

# Roadmap for Social Inclusion: Mid-Term Review

## *Submission by the Citizens Information Board*

### Introduction

The Citizens Information Board (CIB) welcomes the opportunity to make a submission on the Mid-Term Review of the Roadmap for Social Inclusion 2020-2025. The review is timely and very important in the context of current inflationary and energy costs pressures, and it is to be hoped that it will provide new impetus for implementing the Roadmap aims across the various relevant domains – income, housing, health services, education and energy.

The submission is informed by the experience of and feedback from CIB-funded services<sup>1</sup> – the Citizens Information Services (CISs), the Citizens Information Phone Service (CIPS), the Money Advice and Budgeting Service (MABS) and the National Advocacy Service for People with Disabilities (NAS). These services between them have a significant engagement with individuals and households experiencing social exclusion or poverty in one form or another. These include welfare dependent households, people in low-income and precarious employment, people who experience difficulties in transitioning from welfare to work, over-indebted families, people with disabilities and older people who require long-term care and support.

CIB, using reporting and feedback mechanisms from its funded services, is well placed to observe, identify, and analyse how specific issues relating to social exclusion arise, evolve and have impact over time. Many users of CIB-funded services present with multi-faceted queries and problems frequently associated with an inability to meet the costs of daily living and sometimes financial hardship. In particular, the experience of people who find themselves located between low-paid/precarious employment and social welfare benefits and/or dependent on housing supports - which is regularly reflected in queries to CISs, CIPS and in MABS casework - provides insights that can inform the effectiveness of social inclusion policies and strategies. The experience of CIB-funded services resonates strongly with the findings of a recent Behaviour and Attitudes Survey<sup>2</sup> which found that four in five people stated that they have less money in their pockets compared to this time a year ago and that more than one-third are economising on food.

A substantial number of queries that CIB-funded services deal with involve people who survive financially on an often-complex blend of social welfare payments and income from part-time, low-pay employment. Evidence from services continues to demonstrate the pressures people are facing as well as their experiences of being ‘caught in a bind’ between working on low pay and eligibility requirements for a range of state supports involving different means tests, income thresholds, and disregards as reflected in our recent Pre Budget Submission.<sup>3</sup> CIS data over recent years has highlighted the fact that those employed in atypical work experience particular difficulties in accessing supports when unemployed, ill or have a disability or who are taking maternity leave.

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<sup>1</sup> In 2021, 338,167 people contacted CISs with 693,921 queries and MABS dealt with 37,484 new clients/callers in relation to problem debt.

<sup>2</sup> Irish Times 24 Sep. <https://www.irishtimes.com/life-style/2022/09/24/more-than-one-million-say-they-are-struggling-to-make-ends-meet-september-ba-poll-finds/>

<sup>3</sup> [https://www.citizensinformationboard.ie/downloads/social\\_policy/submissions2022/CIB-Pre-Budget-Submission-2023.pdf](https://www.citizensinformationboard.ie/downloads/social_policy/submissions2022/CIB-Pre-Budget-Submission-2023.pdf)

## Challenges in reducing poverty and social exclusion

COVID-19 has had a major impact on the Government's ability to deliver on goals and targets not directly related to responding to the pandemic. The Social Welfare Statistics Annual Report 2021<sup>4</sup> shows that the supports provided by the Department during 2021 continued to be dominated by the response to the public health restrictions due to COVID-19 – with particularly high levels of expenditure on working age income, working age employment and illness supports.

While the biggest challenges associated with COVID-19 may have passed, the inflationary pressures and rising energy costs present new challenges in terms of making meaningful progress on reducing poverty and improving social inclusion. On the positive side, the current high levels of employment and tax revenue offer some opportunities to address ingrained social exclusion.

The arrival of 54,000 Ukrainians to Ireland since the invasion of Ukraine in February of this year has also required a considerable response in terms of accommodation and various supports, as well as of public sector staff in the provision of services.

## Progress in reducing poverty and social exclusion

SILC 2021 data<sup>5</sup> shows clearly that some progress had been made in reducing poverty rates in 2020.<sup>6</sup> For example, the at risk of poverty rate was 11.6% in 2021, compared with 13.2% in 2020. However, without the COVID-19 pandemic income supports, this figure would have been 19.9%, while if all social transfers are excluded, the at-risk-of-poverty rate would rise to 38.6%. This is a critically important fact for the Roadmap in the coming years.

A metric with significant relevance to poverty and social inclusion is that of enforced deprivation<sup>7</sup> which was experienced by 13.8% of the population according to SILC 2021 (marginally lower than the 2020 figure).

The consistent poverty rate, which includes those persons who are defined as being both at risk of poverty and who are also experiencing enforced deprivation, was 4%, compared with 4.7% in 2020. Particular groups are still experiencing high levels of consistent poverty relative to the general population, including those with long term health problems, those who are unemployed and single adult households with children.

The provisional findings of the Minimum Essential Standard of Living (MESL) research for 2022 show that not adjusting social welfare rates in line with current hikes in inflation effectively represents a cut

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<sup>4</sup> <https://assets.gov.ie/232030/69025f99-bd07-4774-afa7-f7866631866c.pdf>

<sup>5</sup> Survey on Income and Living Conditions (SILC) 2021, <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2021/>

<sup>6</sup> The income referenced for the 2021 survey spans the period from January to December 2020. The data for SILC 2021 was published in April 2022.

<sup>6</sup> <https://assets.gov.ie/232030/69025f99-bd07-4774-afa7-f7866631866c.pdf>

<sup>6</sup> Survey on Income and Living Conditions (SILC) 2021, <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2021/>

<sup>6</sup> The income referenced for the 2021 survey spans the period from January to December 2020. The data for SILC 2021 was published in April 2022.

<sup>7</sup> The enforced deprivation rate is the percentage of persons that are considered to be marginalised or deprived because they live in households that cannot afford goods and services which are considered to be the norm for other households in society

in household income. For example, a €17 increase to working age social welfare payments would only enable a household to financially stand still at the current rate of inflation, which is still expected to rise, and would not move households in any way closer to income adequacy.

The MESL cost is 5% higher in the first half of 2022, compared to 12 months earlier. With household energy and food comprising over a quarter of the MESL basket, households on low and fixed incomes are more exposed to the exceptional price increases in these essential areas of core expenditure.<sup>8</sup>

### Housing in the context of The Roadmap for Social Inclusion

While housing is widely regarded as a key determinant of social inclusion, including in the Roadmap for Social Inclusion, the ongoing reality is that some people are forced to live in poor standard and/or inappropriate accommodation. The growing number experiencing homelessness is fundamentally at odds with a social inclusion principle. A European Commission Report on the 2022 National Reform Programme of Ireland<sup>9</sup> references the housing supply issues currently being experienced across Ireland, stating that the lack of social housing, together with surging rental prices added to the ongoing structural housing crisis in Ireland.

Despite the various social housing policy initiatives taken by Government, homelessness has continued to increase with figures for July 2022 published by the Department of Housing<sup>10</sup> showing that 10,568 people (3,137 children) were homeless.

The 2021 Summary of Social Housing Assessments 2021<sup>11</sup> shows 59,247 households were assessed as being qualified for, and in need of, social housing support as of November 2021. This figure is down 2,633 (4.3%) from 61,880 households listed in the 2020 assessment and represents a total decrease of 32,353 (35.3%) since 2016. However, very importantly, this figure does not include households in the private rented sector in receipt of HAP. Neither does it include all homeless families enumerated as accessing emergency accommodation. It does not include victims of domestic violence. It does not include asylum seekers granted protection orders and living in transitional accommodation. Neither does it include the 12,000 people (including nearly 2,800 children), currently living in direct provision.<sup>12</sup> These are the households most at risk of poverty and social exclusion, which are not identified as a specific target group in the Roadmap.

A Report by the Houses of the Oireachtas Parliamentary Budget Office (PBO) in 2022<sup>13</sup> estimated that a more accurate estimate for households with a housing need may be closer to 122,000.<sup>14</sup> It should also be noted that homeless figures tend to exclude those in 'hidden homeless' living situations – those staying with friends or family, 'sofa surfing', or those who are not interacting with homeless services.

A forthcoming CIB/Threshold Social Policy Report on the private rented sector highlights the impact of rent inflation on general affordability and its related effects. The issue of homelessness generally

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<sup>8</sup> [https://www.budgeting.ie/download/pdf/vpsj\\_mesl\\_pre-budget\\_2023\\_submission.pdf](https://www.budgeting.ie/download/pdf/vpsj_mesl_pre-budget_2023_submission.pdf)

<sup>9</sup> [https://ec.europa.eu/info/sites/default/files/2022-european-semester-country-report-ireland\\_en.pdf](https://ec.europa.eu/info/sites/default/files/2022-european-semester-country-report-ireland_en.pdf)

<sup>10</sup> <https://assets.gov.ie/232783/2ec3b798-c64a-42d9-9c2e-300da6015812.pdf>

<sup>11</sup> <https://assets.gov.ie/219921/a5419e65-a5ff-4c84-80de-1f18919e0c73.pdf>

<sup>12</sup> <https://www.irishtimes.com/ireland/social-affairs/2022/06/08/more-than-11600-people-in-direct-provision-as-numbers-rise-to-record-levels/#:~:text=Some%206%2C266%20people%20are%20currently,released%20to%20The%20Irish%20Times.>

<sup>13</sup> Housing Ireland: Trends in Spending and Outputs of Social and State Supported Housing 2001-2020, [2022-03-02\\_housing-ireland-trends-in-spending-and-outputs-of-social-and-state-supported-housing-2001-2020\\_en.pdf](https://www.oireachtas.ie/publications/2022-03-02_housing-ireland-trends-in-spending-and-outputs-of-social-and-state-supported-housing-2001-2020_en.pdf) (oireachtas.ie)

<sup>14</sup> *Ibid.* p.36

and, specifically, in the context of people having to leave their existing accommodation or being faced with the threat of eviction is at the very heart of the social inclusion debate. The research highlights:

- The vulnerability, or exposure, of certain renters to the threat of no-fault evictions
- The impact of rental inflation on general affordability.
- The link between rent increases and rent arrears; and
- The implications of rent increases for those in receipt of housing support.

The analysis in the report demonstrates the extent to which Threshold and CIS clients are exposed to the threat of homelessness. In general, six of every ten clients supported by Threshold in 2019 and 2020 were at risk of homelessness, half of whom were seeking support in dealing with a tenancy termination. CIB data has also demonstrated an increase in the numbers of queries to CISs about homelessness, for example, a 70% increase in query numbers in the first half of 2022, compared to the first half of 2021.

Criticisms of HAP as a housing support is a regular feature of policy feedback from CISs. A CIB social policy report, *Housing Assistance Payment: The Experience of Citizens Information Services*<sup>15</sup> highlighted a number of difficulties relating to HAP, including, in particular, the limited stock of private rented accommodation and the even more limited stock of affordable private rented accommodation.

The HAP approach exposes vulnerable families to the vagaries of the private rented market and feeds the increase in private rents. CISs report households in receipt of HAP paying 35-40% of their monthly income on covering rental costs.<sup>16</sup> This is clearly at odds with the principle of equitable access to social housing.

HAP cannot respond to the level of housing need for low-income households within the private rental market. While recipients of HAP are allowed to top-up the payment, (once the total rent they pay doesn't exceed 30% of their net income), a Threshold/St Vincent de Paul survey<sup>17</sup> has found that 20% of surveyed tenants were paying more than the 30% limit, with 10% paying more than 40% of their net income on rent. Landlords are also continuing to refuse to accept HAP, despite this type of discrimination being illegal. The same research has also found that almost half (45%) of those paying a top-up said that they were struggling with paying utility bills, buying groceries, and covering childcare and school costs as a result.

For households with below average or average incomes (e.g., most people with disabilities), there is clearly an affordability issue, most notably in Dublin, as competition from medium and high-income households is squeezing them out of the market. This issue applies to both people reliant on state support and to others on low income but not entitled to state support.

### Implications for Roadmap for Social Inclusion

Since progress to date in Ireland has not kept pace with either actual housing needs or targets, there is a need for a wider engagement on the matter at societal, political, and governmental levels. This dialogue needs to be located within a human rights and social inclusion framework within which people's right to adequate housing is a core component of citizenship as well as reflecting the

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<sup>15</sup> Housing Assistance Payment: The Experience of Citizens Information Services, [https://www.citizensinformationboard.ie/downloads/social\\_policy/HAP\\_Report\\_CIB\\_2017.pdf](https://www.citizensinformationboard.ie/downloads/social_policy/HAP_Report_CIB_2017.pdf)

<sup>16</sup> Citizens Information Board Pre-budget 2023 Submission available at [https://www.citizensinformationboard.ie/downloads/social\\_policy/submissions2022/CIB-Pre-Budget-Submission-2023.pdf](https://www.citizensinformationboard.ie/downloads/social_policy/submissions2022/CIB-Pre-Budget-Submission-2023.pdf)

<sup>17</sup> The Housing Assistance Payment; Making the Right Impact? [https://threshold.ie/wp-content/uploads/2022/06/00881\\_hap\\_survey\\_report\\_2019\\_-\\_web.pdf](https://threshold.ie/wp-content/uploads/2022/06/00881_hap_survey_report_2019_-_web.pdf)

provisions of Article 19 of the UNCRPD with regard to persons with disabilities. The resource implications of direct social housing provision by Local Authorities are of course significant but may not be as great in the longer-term as the costs involved in the current approach with its over-reliance on the private sector.

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.

### Impact of increasing energy costs

Relative to higher-income households, lower-income households spend a greater share of their income on energy and food, and less on goods and services. Energy spending, which is 14% of disposable income for low-income households, compares to 5.5% for high-income households.<sup>18</sup>

While the increases in the Fuel Allowance that were provided in response to the cost of living increases this year are important and timely, the combination of these measures has just maintained the value of the Fuel Allowance relative to the 46.7% home energy inflation (which may continue) as measured by the CPI.<sup>19</sup> The one-off measures announced in Budget 2023<sup>20</sup> have been shown to reduce average income losses, apart from lone parents, pensioners and non-earning households who will be slightly worse off in 2023<sup>21</sup>. When the one-off policies lapse, low income households will face greater challenges.

The qualifying conditions for the Fuel Allowance exclude some people who might be reasonably expected to be able to avail of the Allowance.<sup>22</sup> While provisions in Budget 2023 related to the Fuel Allowance will certainly help, reliance on the Fuel Allowance as a core plank in dealing with rising energy costs is unsatisfactory. From a social inclusion and energy poverty perspective, the Fuel Allowance system as it currently operates is inadequate.

CIS query data shows that there were 14,251 queries on the Fuel Allowance in 2021, and the number of such queries doubled in Q1 2022, compared with Q1 2021. In addition, there was a 50% increase in queries relating to the Household Benefits Package, which assists with the cost of electricity or gas bills. Questions about eligibility featured strongly in the data, particularly from those groups who were just outside the qualifying criteria for the allowance. There is a strong argument from a social inclusion perspective that qualification for support for energy costs should be based on means in the first instance, rather than on being in receipt of a particular qualifying social welfare payment, or the duration of time on a payment, or the conditions in relation to living alone or only with certain individuals who meet particular conditions.

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<sup>18</sup> MESL Pre-Budget 2023 Submission, [https://www.budgeting.ie/download/pdf/vpsj\\_mesl\\_pre-budget\\_2023\\_submission.pdf](https://www.budgeting.ie/download/pdf/vpsj_mesl_pre-budget_2023_submission.pdf)

<sup>19</sup> VPSJ (2022) MESL Pre-Budget 2023. [https://www.budgeting.ie/download/pdf/vpsj\\_mesl\\_pre-budget\\_2023\\_submission.pdf](https://www.budgeting.ie/download/pdf/vpsj_mesl_pre-budget_2023_submission.pdf)

<sup>20</sup> Including the €400 one off payment to Fuel Allowance recipients.

<sup>21</sup> ESRI (2022) ESRI Post-Budget Briefing Budget 2023: Distributional impact analysis. <https://www.esri.ie/events/post-budget-briefing-0>

<sup>22</sup> See Citizens Information Board Pre-budget 2023 Submission available at [https://www.citizensinformationboard.ie/downloads/social\\_policy/submissions2022/CIB-Pre-Budget-Submission-2023.pdf](https://www.citizensinformationboard.ie/downloads/social_policy/submissions2022/CIB-Pre-Budget-Submission-2023.pdf)

### Income adequacy/protection

Research on MESL has demonstrated that social welfare payments are inadequate for low-income households. The Vincentian Partnership's Living Wage estimate, which is benchmarked against the cost of the minimum standard of living, is €12.90 per hour for 2021/2022.

The median household disposable income in SILC 2021 was €46,471, an increase of €2,556 (+5.8%) from 2020 (€43,915). However, without COVID-19 income supports, there would have been a 6.2% decrease in year-on-year median household disposable income. Importantly, where the head of household had an educational attainment of primary level or below, the median household disposable income was €24,660, compared with €63,914 for those with a third level degree or above.

The target for poverty reduction - set out in the Roadmap for Social Inclusion 2020 – 2025, is to reduce the percentage of the population in consistent poverty to 2% or less by 2025. The SILC 2021 data shows that progress is being made in this regard. The likely central ongoing role of social transfers on poverty rates is a key factor going forward.

### Additional areas that should be included in the Roadmap

#### *People in long-term residential care*

People who are long-term in residential care are widely regarded as one of the most socially excluded groups in society. However, there is no reference in the Roadmap to the need to shift the balance in long-term care provision from residential care to care in the community. While there is reference to introducing a new statutory scheme of regulation for home care (which has not happened), there is no reference to the introduction of statutory provision for home care even though this had been mooted for some years. The current Programme for Government commits to introducing a statutory scheme to support people to live in their own homes and to provide equitable access to high quality, regulated home care, integrated with other health and social care services.<sup>23</sup> It is the strong view of CIB that this is an area that should be provided for in the Roadmap for Social Inclusion.

#### *Personalised budgets*

Ten years ago, the *Value for Money and Policy Review of Disability Services in Ireland*,<sup>24</sup> which was promulgated as the benchmark for achieving disability sector improvements, recommended, amongst other things, the provision of 'supports' rather than 'services', using person-centred plans, individualised supports and personal budgets to bring Ireland in line with the global changes within the disability sector. The Task Force on Personalised Budgets reported in 2018<sup>25</sup> and its recommendations were accepted by the then Minister for Disabilities. However, there is no evidence of any progress on that front in recent years. CIB believes that targets in relation to the introduction of personalised budgets for disabled people should be included in the Roadmap.

#### *Meeting the additional costs of disability*

The Roadmap for Social Inclusion must acknowledge the additional living costs incurred due to having a disability and include appropriate targets to address such costs. People with disabilities face extra

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<sup>23</sup> Programme for Government, *Our Shared Future*, p.50

<sup>24</sup> <https://assets.gov.ie/16118/73763752d55d4618bc9f8e18f3091290.pdf>

<sup>25</sup> Task Force on Personalised Budgets Report, *Towards Personalised Budgets for People with a Disability in Ireland* <https://assets.gov.ie/9931/17cdb50249ef4927b2e7186f3714f8ab.pdf>

costs of €9,482 - €11,734 a year on top of everyday expenses.<sup>26</sup> Research<sup>27</sup> also reveals that the net additional costs required to enable a socially acceptable MESL for a household caring for a child with a profound intellectual disability can range from €207 to €308 per week. This research finds that, when compared to a household without additional caring and disability needs, some households caring for a child with a profound intellectual disability face a greater depth of income inadequacy than other households. Changes introduced by Budget 2023 will help to address some of these shortfalls.

Reducing the at-risk-of poverty or social exclusion (AROE) rate for people with disabilities from 36.9% (2018) to 28.7% by 2025 and then to 22.7% by 2030, as envisaged in the Roadmap, presents a significant challenge as does increasing the employment rate from 22.3% to 25% (2021) and then to 33% (2027).

Given that Ireland has an ageing population, and the prevalence of disability increases greatly with age, it is likely that the number of disabled people will increase.

#### *Under-investment in public social services*

A stronger focus in the Roadmap is required on the funding of public social services. Under-investment in public services is referenced in a European Commission Report on the 2022 National Reform Programme of Ireland<sup>28</sup> which has expressed concern *“in relation to the availability of social services for disadvantaged groups, and the situation for homeless people, people with disabilities, single parent and low work intensity households.”* In Ireland, low-income households are more likely to rely on public services almost exclusively and lack the economic means to engage with private sector service provision, for example, in the areas of health, housing, education, childcare, social and residential care.

#### Key considerations relevant to the Roadmap for Social Inclusion

CIB wishes to emphasise a number of key points relevant to the Mid-Term Review of the Roadmap for Social Inclusion.

- There is a need to continue to address the intrinsic link between poverty, under-employment and low-income employment;
- There is a need to ‘make work pay’ for all people who wish to and are available for work and to eliminate welfare-to-work traps;
- The move to a Living Wage should be expedited and all social welfare payments should be benchmarked with minimum essential living rates;
- There is a need to ensure that there are mechanisms in place for a quick response to mitigate adverse economic shocks related to, for example, sharp inflation, particularly in relation to energy costs;

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<sup>26</sup> <https://www.gov.ie/en/publication/1d84e-the-cost-of-disability-in-ireland-research-report/>

<sup>27</sup> care-at-home-costs-of-care-arising-from-disability, <https://familycarers.ie/media/2457/care-at-home-costs-of-care-arising-from-disability-2022.pdf>

<sup>28</sup> EU Report for Ireland 2022 [https://ec.europa.eu/info/sites/default/files/2022-european-semester-country-report-ireland\\_en.pdf](https://ec.europa.eu/info/sites/default/files/2022-european-semester-country-report-ireland_en.pdf) p. 48

- The role of social transfers in addressing cost of living increases must be kept to the forefront;
- 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.
- The proposed development of a new social housing income eligibility model should be expedited.
- The impact of inflation on rural, older, and low-income households, who, relative to higher-income households - spend a greater share of their income on energy and food, and less on goods and services should be closely monitored on an ongoing basis.<sup>29</sup>
- In relation to the *Climate Action Plan 2021*, from a social inclusion perspective, it is essential that the costs of the transition are shared in a manner that the impact is equitable and that existing inequalities are not exacerbated.
- In the medium-term, there is a need to address the current under-investment in quality public services, including publicly funded childcare.

### Ongoing challenges in implementing the Roadmap

The Roadmap in its implementation up to 2025 and beyond will need to recognise that the ageing of the Irish population, the environmental transition and the requirement to improve State services will mean that more tax revenue will be required in the years ahead. The short-term policy agenda has evidently to focus on how to support households and businesses through the energy and current inflationary crises. However, longer-term planning is required if the momentum for social inclusion and poverty reduction is to be sustained. It is noted that the Report of the Commission on Tax and Welfare<sup>30</sup> recommends a range of tax changes, including new revenues in areas like indirect tax, capital taxes, property taxes and social insurance. It also has important welfare proposals, including how to better structure childcare supports and help lower income working families.

The Roadmap sets out a cross-government response to social inclusion and poverty reduction. Its High-Level Goals and Commitments are important and centrally relevant as is the emphasis on integrated planning and funding, and integrated social impact assessment. While it is evident that work is ongoing to deliver on various initiatives to support the Roadmap in order to achieve a coordinated and integrated approach to social inclusion, the extent to which particular initiatives are impacting positively on social inclusion is as yet somewhat unclear. More analysis and research is required in this regard.

The reality appears to be that, notwithstanding important reductions in rates of poverty, the Roadmap to date in its implementation has failed to fully address many of the ingrained social, cultural and economic barriers to social inclusion. The reality that continues to be evidenced clearly by the experience of users of CIB-funded services and by other research is that people continue to experience inequality and social exclusion in a wide range of areas, in particular, access to adequate and appropriate housing and to health services.

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<sup>29</sup> <https://www.cso.ie/en/statistics/prices/consumerpriceindex/>

<sup>30</sup> <https://www.gov.ie/en/publication/7fbcb-report-of-the-commission/#foundations-for-the-future-report-of-the-commission-on-taxation-and-welfare>



There are justifiable concerns that this failure will continue unless the implementation of the Roadmap is organised around clearer, more specific and measurable targets and outputs across a range of variables (and not just poverty rates) and ongoing monitoring carried out accordingly.

The Roadmap for Social Inclusion needs to be in harmony with Article 31 of the Council of Europe's Revised European Social Charter<sup>31</sup> which sets out the responsibility of the State to "*promote access to housing of an adequate standard, to prevent and reduce homelessness and to make the price of housing accessible*". The fact that Ireland has not to date accepted Article 31 of the Charter has significant relevance to Ireland's approach to addressing the social exclusion aspects of housing provision.

### Final points

While inflation is 'universal', it has a disproportionate impact on those who are on lower incomes. The Roadmap should, therefore, include a full and transparent implementation of Poverty Impact Assessment Guidelines across all relevant Government Departments. This is particularly important given the impacts of cost-of-living increases especially on low income households and on marginalised groups generally.

CIB strongly endorses the acknowledgement in the Roadmap that tackling poverty and social exclusion requires a whole of Government approach. However, a more focused and targeted approach is required from each individual Department to achieve greater equality in these areas. For example, CIB has consistently highlighted the need to strengthen the resourcing of home care packages and has consistently advocated for a statutory right to home care. This is critical to making Ireland "*one of the most socially inclusive States in the EU*" which is a core aim of the Roadmap for Social Inclusion.

Measures included in Budget 2023 will clearly help in the short to medium term, in particular, energy costs credits, increases in social welfare payments, additional once-off payments, tax credits for renters, free schoolbooks, reduction in child care costs, changes to the means assessment threshold and criteria for the Fuel Allowance.

CIB acknowledges that progress in delivering on the Roadmap was significantly impacted by the COVID-19 pandemic. Progress as indicated in the *First Progress Report* are noted and welcomed. Government responses to the financial pressures that people experienced during the pandemic illustrated the fact that a focused and robust response to social and economic exclusion is possible.

Poverty traps and barriers to the movement from welfare to work are regularly reported by CISs and MABS. The complexity of the social welfare system and the precarious financial position of many low-income workers continues to be a concern. CIB is of the view that it is necessary to move from a situation in which welfare entitlements are maintained at an adequate level through unpredictable annual budgetary decisions to a situation in which they are linked to objective criteria such as average income levels and/or inflation rates.

The position of persons with disabilities, particularly with regard to housing, is viewed as deserving of much more 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 give prominence in a revised Roadmap to the situation and needs of people in long-term residential care. The Roadmap should indicate a commitment to providing adequate and integrated care in the community.

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<sup>31</sup> Revised European Social Charter, <https://rm.coe.int/168007cf93>

The Roadmap must continue to recognise the degree to which disadvantaged groups rely and are dependent on state-provided services such as healthcare, social care, education, housing and other services such as public transport. Accessibility and quality of provision by the state will continue to be crucial. Ongoing investment is essential in these areas.

While the Roadmap clearly indicates a high level of dependency for its delivery on frontline government departments such as Health, Social Protection and Education, it is imperative that targets be set for all government departments and agencies, and that a whole-of-government approach becomes more embedded in the Roadmap.