



Submission to

**Mid Term Review of
Roadmap for Social
Inclusion**

October 2022

1. Executive Summary

People with disabilities have lived with shockingly, disproportionately high levels of poverty and low levels of employment for many years. This is due to a number of issues including structural barriers to securing and taking up employment and the significant additional cost of being disabled, as well as the fact that the basic design of our social protection system leaves thousands of people below the poverty line and unable to afford the essentials required for a decent standard of living.

The first Roadmap for Social Inclusion Progress Report and Report Card shows that Ireland is one of the worst performing countries in the EU in both these areas, ranking with much less well-off countries rather than the Western European countries we rank alongside on other social indicators. The mid-term review of the Roadmap thus offers an opportunity to reflect on disability poverty and its root causes, and to course correct and take action to address the issues. In order to deliver on its commitments in the Roadmap for Social Inclusion and the Programme for Government, the government must provide specific targeted increases in income and social protection supports to disabled people, in particular those who cannot work and live with many extra costs due to their disability.

Key Recommendations

- A focus on averages (for example the goal to reduce consistent poverty to 2%) needs to be complemented by **a strong focus on sub targets and the poverty and deprivation rates of certain groups**, in particular those which remain disproportionately high, like people with disabilities.
- Roadmap progress reports and national and EU data show that **disability poverty and employment are one of our worst-performing areas**, with national disability poverty rates disimproving in 2021, and Ireland not even on track for reaching its public sector disability employment targets. This shows that the **Roadmap approach and implementation has not yet been effective or delivered improvements for disabled people**.
- The disability targets and commitments in the Roadmap have no actions underneath them showing how those targets will be reached. **Actions, timeframes and resources are needed to deliver on commitments**. Moreover **a specific poverty reduction strategy** and set of actions is required for people with disabilities.
- In order to reduce disability poverty, **action is needed on the Cost of Disability**. Disability organisations have long called for a

Cost of Disability payment. A comprehensive three year strategy to address all aspects of this issue must be developed, and the crucial income aspect of Cost of Disability must be addressed by the Department of Social Protection.

- A **strengthened and effective inter-departmental, and cross departmental, approach** is key, in general but also particularly for disability commitments. The long pending transfer of Disability from the Department of Health to DCEDIY could contribute to strengthened delivery of Roadmap disability commitments.

2. Disability Poverty – One of the Worst Countries in EU

People with disabilities have lived with shockingly, disproportionately high levels of poverty and low levels of employment for many years. This is due to a number of issues including structural barriers to securing and taking up employment and the significant additional cost of being disabled, as well as the fact that the basic design of our social protection system leaves thousands of people below the poverty line and unable to afford the essentials required for a decent standard of living.

The first Roadmap for Social Inclusion Progress Report and Report Card again shows that Ireland is one of the worst performing countries in the EU in both disability poverty and employment, ranking with much less well-off countries, rather than the Western European countries we rank alongside on other social indicators.

Disability poverty rates have remained stubbornly and consistently high in Ireland over the past decade and longer, even during the post financial crisis recovery years. Worryingly, the CSO SILC 2021 data shows that poverty rates for those unable to work due to disability (ie those relying on the Department of Social Protection for their income) increased significantly, while the national rates decreased. Those unable to work due a long-standing health condition (disability/illness) are now almost five times (19.2%) more likely to live in consistent poverty compared to the national average (4%). If the government is to deliver on the Roadmap commitment to reduce consistent poverty to 2%, it will need to look at specific social groupings with much higher rates, like disabled people, and develop measures to address the root causes of their higher levels of poverty.

Over the past two years we have seen the power and capacity of Ireland's social protection system to protect people from poverty, through the use of the €350 PUP, which successfully protected hundreds of thousands of people and their families from poverty, as the 2021 SILC data shows. The mid-term review of the Roadmap for Social Inclusion offers an opportunity then to reflect on disability poverty and its root causes, and to take action

to address the issues. In order to deliver on government commitments, and to both address this ongoing structural economic and social inequality and mitigate the disastrous impacts of the cost of living crisis which is pushing people further into poverty, the government must provide specific targeted increases in income and social protection supports to disabled people, in particular those who cannot work due to disability and live with many extra costs.

3. Government and Roadmap commitments on Disability

This government made a number of commitments to disabled people and to those who rely on our social protection system to live when it was established. The *Programme for Government* promised that “Policy decisions throughout the course of the Government will consistently seek to improve living standards for the most vulnerable in society”, committing to a new social contract. It also stated: “as we emerge from the COVID pandemic, we must build upon the unity, which was fundamental in our response, to improve outcomes for those who are struggling on low incomes, struggling with caring responsibilities, having to raise their families alone, or living with a disability. Any changes made in social welfare provisions will continue to be gender- and equality-proofed. We will do this by rigorous implementation of the [...] Roadmap for Social Inclusion 2020-2025”¹.

The *Roadmap for Social Inclusion* commits to specific poverty reduction and employment targets for people with disabilities, i.e. to

- reduce the AROPE (At Risk of Poverty and Social Exclusion) rate from 36.9%, first to 28.7% (2025) and then to 22.7% (2030);
- increase the employment rate from 22.3%, first to 25% (2021) and then to 33% (2027).

While these targets are insufficient, and it is inherently unfair to have substantially less ambitious poverty reduction targets for disabled people than for the general population (the Roadmap aims to see disabled people have significantly higher at risk of poverty rates in 2030 than the national average in Ireland right now), the specific and measurable targets were nonetheless a welcome development when the Roadmap was published. However, it is clear that the current level of social protection provision, and other disability policy supports, will not deliver these poverty reduction targets, meaning that increased social protection rates and targeted measures will be necessary to deliver these commitments.

¹ <https://www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/>, p.75.

The Roadmap also aims to reduce overall consistent poverty to 2% by 2025. While the national average for consistent poverty is currently 4%, for those unable to work due to disability it is 19.2%, almost five times higher. This demonstrates the urgent need to focus on people with disabilities under the Roadmap.

The disability specific section of the Programme for Government also commits to “use the recent research into the cost of disability to individuals and families to properly inform the direction of future policy (p.79).” Ireland has also committed to an AROPE reduction target of 90,000 people as our contribution to the *EU Pillar of Social Rights* poverty reduction targets. Given the disproportionate levels of disabled people at risk of poverty in Ireland, if the government wishes to deliver on these targets it should bring in measures to support disabled people in particular.

At the most fundamental level, signatories of the UN CRPD (ratified by Ireland in 2018), are bound by Article 28 on “Adequate standard of living and social protection”. State parties recognise “the right of persons with disabilities to an adequate standard of living for themselves and their families, including adequate food, clothing and housing, and to the continuous improvement of living conditions, and shall take appropriate steps to safeguard and promote the realization of this right”. Article 28 further states that parties recognise the right to social protection, to appropriate assistance for disability-related needs, to poverty reduction programmes, to public housing, and “to assistance from the State with disability-related expenses”.

Our current level of below-poverty line social protection provision cannot possibly deliver the potentially transformative changes in poverty and deprivation for disabled people committed to in the above policy documents, especially in a context of the 2023 social protection payment rate not even keeping up with inflation, as was the case also in 2022. If the government is serious about delivering on its Roadmap and UN CRPD commitments it must urgently address disability poverty by committing resources to targeted measures to reduce poverty amongst those unable to work due to disability. In particular it must act on the INDECOS Cost of Disability report (commissioned by the Department of Social Protection) and the very significant income inadequacies that are comprehensively documented in it. With disability related extra costs of €8,700 - €12,300 per year now well established, and a current basic annual Disability Allowance income of €10,816 (increasing to €11,440 in 2023), the income gap for disabled people is undeniable and can no longer be ignored. To deliver on the Roadmap commitments the government will also need to allocate resources to improve the employment possibilities of those who are able to work in spite of their disability but encounter structural barriers to employment.

Roadmap for Social Inclusion First Progress Report

The First Progress Report on the Roadmap to Social Inclusion documented a bleak picture, and the disability poverty gap that needs to be urgently addressed. The report's scorecard shows that (in 2019) Ireland's EU At Risk of Poverty and Exclusion (AROPE) poverty rate for disabled people actually *disimproved* - 37.8% of people with disabilities were deemed to be at risk, with Ireland ranking a dismal **23rd out of the EU27. This is one of only five EU indicators where Ireland's ranking disimproved.** It is also **one of only two EU Roadmap indicators where Ireland ranks outside the top 20 EU countries.** This clearly shows the need for specific attention to disability poverty in order to deliver on the Roadmap's commitments, and for a set of targets and concrete actions to be developed to deliver the almost 10% poverty reduction committed to by 2025 (three years from now). We await publication of the second Progress Report, which we fear will show a similar lack of progress, given what the 2021 CSO SILC data showed.

UN's Committee on Economic, Social and Cultural Rights asks about Roadmap Measures and Resources

In March 2022 the UN's *Committee on Economic, Social and Cultural Rights* asked a number of questions that are relevant to the Roadmap's disability commitments in its "List of issues in relation to the fourth periodic report of Ireland*". In particular the Committee asked about policy measures to increase employment, ensuring fair wages for disabled people, measures to reduce disability poverty and resource allocation to deliver targets in the Roadmap, and what action is being taken on the cost of disability.²

4. Overall General Recommendations for Roadmap Mid-Term Review

- A focus on averages (for example the goal to reduce consistent poverty to 2%) needs to be complemented by **a strong focus on sub targets and the poverty and deprivation rates of certain groups**, in particular those which remain disproportionately high, like people with disabilities.
- Roadmap progress reports and national and EU data show that **disability poverty and employment are one of our worst-performing areas**, with national disability poverty rates disimproving in 2021, and Ireland not even on track to reach its public sector disability employment targets by 2024. This shows

²https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=E%2fC.12%2fIRL%2fQ%2f4&Lang=en

that the **Roadmap approach and implementation has not yet been effective or delivered improvements for disabled people.**

- The disability targets and commitments in the Roadmap have no actions underneath them showing how those targets will be reached. **Actions, timeframes and resources are needed to deliver on commitments.** Moreover **a specific poverty reduction strategy** and set of actions is required that focuses specifically on people with disabilities.
- In order to reduce disability poverty, **action is needed on the Cost of Disability.** Disability organisations have long called for a Cost Of Disability payment. A comprehensive three year strategy to address all aspects of this issue must be developed, and the crucial income aspect must be addressed by the Department of Social Protection.
- A **strengthened and effective inter-departmental, and cross departmental, approach** is key, in general but also particularly for disability commitments. The long pending transfer of Disability from the Department of Health to DCEDIY could contribute to strengthened delivery of Roadmap disability commitments.

5. Specific Disability Recommendations

Poverty and Disability

- There is no way that Ireland can reach the poverty reduction targets in the Roadmap without increasing the focus on, and resources for, disabled people.
- A specific poverty reduction strategy for disabled people should be developed, given their disproportionately high poverty rates. Lay out the **specific steps and actions to be taken each year** to deliver the reduction targets, and **allocate sufficient funding** to 2025 to deliver them.
- Disabled people are **significantly more likely to live in energy poverty**, so strategies to address this should specifically consider their needs.

Cost of Disability

- It is concerning and troubling that the action in the Roadmap on Cost Of Disability is marked as “achieved”, and this highlights a general issue with the Roadmap. The Roadmap frequently commits to publish a report or strategy, but has no underlying actions attached to that commitment that show how targets will be delivered, how, by when and through what steps strategies will be

implemented, what action will be taken on issues that reports document and what the outcomes of such processes will be.

- The **INDECON Cost of Disability report is a landmark report**, and a very significant piece of work. Thus publishing it is indeed a significant achievement, and the culmination of years of hard work. However **publishing a report that documents and assesses a policy issue and problem is not the same as taking action to address that issue and the impact it has on, in this case, disabled people**. The report outlines a significant number of issues that need to be addressed and remedied through policy, and action is needed on these areas to deliver on Roadmap commitments.
- INDECON recommended a multi-faceted approach to addressing the significant extra costs of disability, including **increased cash payment, enhanced access to services and targeted grant programmes**. The report stated that these provisions should focus on alleviation of poverty, reducing inequality, and improving social inclusion and quality of life of disabled individuals – falling squarely within the remit of the Roadmap’s aims, and of its parent Department. While it is clear that fully addressing the numerous costs documented in the INDECON report will require action across many government Departments, **nevertheless the Department of Social Protection’s poverty reduction mandate requires it to address the income inadequacies highlighted by the Cost of Disability report**. A key issue highlighted by the report is inadequate income. While some disabled people can be supported to work, and there is clearly great scope to increase our disability employment rates, we know also that many people with disabilities will never be able to work due to their disability. Social protection recipients who undertook the survey that formed part of INDECON’s methodological approach to establishing the Cost of Disability strongly indicated that **the most helpful way for the state to address the extra costs would be to increase their income**.
- At a practical level, to see progress in this area and reduce disability poverty rates, the government should introduce a Cost of Disability payment of at the very minimum €20 a week for those on Disability-related payments, as an interim measure.
- The Department should then work with other government Departments to develop and resource a clear Action Plan to fully address the Cost of Disability over the next 3 years.

Disability Proofing of Budgets

- In order to deliver on Roadmap commitments, the government must ensure that *all* budget decisions are subject to equality, gender and poverty proofing, specifically assessing their impact on

disabled people, including specifically taking into account the Cost of Disability. The Department should work with the ESRI to address the concerning incapacity of the SWITCH model to specifically assess the impact of budgetary measures on disabled people.

Employment

- Publish the next Comprehensive Employment Strategy Phase 3 Implementation Plan, include numerical targets and deliver it rigorously.
- Fully address the issues highlighted in the Make Work Pay report.
- Continue to raise the income disregard and the weekly means disregard annually for disability social protection payments.
- Take action on the recommendations of disability organisations to the recent review of the Reasonable Accommodation Fund and provide sufficient funding to deliver improved outcomes based on the changes recommended.
- Specifically examine the Cost of Disability report to understand the extra costs disabled people experience related to employment, and develop an action plan to address these.
- Develop stronger measures and policies to support self-employed disabled people, including addressing inconsistencies regarding social protection income and means testing, employment supports etc.

Other Policy Areas – Housing, Transport, Energy etc

Social inclusion is a broad and cross-cutting issue. For disabled people, a range of areas need to be considered, and a large number of barriers exist to full community inclusion and participation. These include issues like the lack of fully accessible housing, public transport, public buildings, community and public services. The ongoing chronic lack of independent living supports and Personal Assistance services available to disabled people also needs to be addressed to deliver real social inclusion.

Issues impacting disabled people in relation to housing include the lack of available accessible houses and of matching supported living packages, long social housing waiting lists, and difficulties navigating the social housing application process itself. As Ireland embarks on an ambitious programme of house building to deal with the ongoing housing crisis, the government should remember that building fully universal design (UD)++ and wheelchair liveable homes is essential to ensure social inclusion. Moreover this would be a wise investment in future-proofing Ireland's housing stock, saving money on retrofits and adaptations in the long term.

As the cost of living crisis leads to an increased focus on energy poverty and just transition, it must be remembered that the Cost of Disability report found that disabled people spend 10% more on energy costs, are more likely to be in arrears on utility bills and are more likely to be unable to afford to keep their home adequately warm. Any policies to address Just Transition and energy poverty should consider the needs of people with disabilities, and should offer targeted supports to them.

6. Feedback on Specific Commitments

Commitment 41: NDIS and CES

This commitment was not a new commitment developed for the Roadmap, it essentially reiterated an existing policy commitment, to continue implementing ongoing disability inclusion policies. Moreover the commitment to implement the NDIS (National Disability Inclusion Strategy) now needs to be updated to reflect the move to an approach that will see an implementation plan for the UN CRPD (ratified in 2018 by Ireland) being developed.

While the NDIS was in its time a welcome development, there is agreement across those working on disability that a move is required to a UN CRPD-focused, rights-based approach to disability inclusion in Ireland. We now need a more overarching and cross-Departmental model of implementing the UN CRPD, that embeds the social rather than medical model into Ireland's approach to disability. The NDIS is also a long and unwieldy document which is hard to track – at the July 2022 meeting of the NDIS Steering Group (NDISSG), of which DFI is a member, 134 updates were provided in an Excel spreadsheet, with 55 minutes on the agenda to discuss these updates, meaning less than 30 seconds were allocated for discussion per update! We understand that work on the UN CRPD implementation plan has been delayed this year – consultation will be necessary to ensure that the most effective plan is developed.

DFI understands also that progress on finalising the Phase 3 final implementation plan for the Comprehensive Employment Strategy (CES) has been pending since the beginning of the year. This is concerning given the commitments to increased employment rates in the CES and Roadmap, and given the opportunities that both increased acceptance of remote working and the ongoing labour market shortages provide. Many disability stakeholders are convinced that it is essential that the implementation plan contains clear annual numerical targets for increased employment in both the public and private sector of disabled people. This is imperative in order to ensure that progress or otherwise can be accurately measured. The data from the 2022 Census also needs to be

promptly analysed in order to provide up to date statistics from which ongoing policy approaches can be developed.

Commitment 42:

1. Reduce AROPE

As previously mentioned, the Roadmap poverty reduction targets, while inherently unequal (setting lower poverty reduction targets for disabled people than the general population accepts a level of structural inequality), are nevertheless a welcome commitment to a target that can be monitored, and delivering on them would go some way to improving Ireland's dismal EU ranking on disability poverty. It is sadly clear however that Ireland is way off delivering on these fairly modest poverty reduction targets. The first Roadmap Progress Report shows a disimprovement in Ireland's ranking, while the second Progress Report is awaited. The national CSO SILC data published some months ago also shows that disability poverty increased on all three indicators from 2020 to 2021 (while the national average declined), showing that things are getting worse not better. Clearly this target requires urgent attention, and discussion with disabled people and disability organisations to develop a specific poverty reduction plan and set of actions to deliver these targets.

While the small incremental improvements in social protection provision for people with disabilities in recent Budgets have been welcome, DFI is nevertheless very concerned that Budget 2023 will ultimately result in a real-term cut in income for disabled people given the ongoing high inflation and price rises. The basic Disability Allowance increase for 2023 at €12 does not even keep pace with inflation: anti-poverty organisations called for a €20 increase at minimum. This is alarming given that only 2 Budgets remain until 2025, by which time the Roadmap promises to reduce the disability AROPE to 28.7%.

DFI has been highlighting these concerns annually in our Pre Budget submissions to the Department of Social Protection since 2020. We have also pointed out on various occasions our concern that there are no actions or indicators underpinning the poverty reduction target mapping out *how* it will be achieved by 2025. As we wrote in our Pre Budget 2022 submission last year "The Roadmap to Social Inclusion also commits to specific targets in poverty reduction, ... it is nevertheless clear that the current level of social protection provision will not deliver a reduction in poverty levels, given that they have remained stubbornly high for years" (p3). We also wrote "If the government is serious about delivering on its commitments to reduce poverty, and the Roadmap for Social Inclusion

poverty reduction targets for people with disabilities, it will need to deliver specific measures in this and future budgets” (p.7).³

The one-off supports to deal with the cost of living crisis which were provided in Budget 2023 were very welcome and will help disabled people to survive a difficult winter, but they are temporary, whereas disability is not a one-off. To address the significant income gap that disabled people experience they should be supported with an income that matches their outgoings, and that covers the extra Cost of Disability they live with. It is also concerning that there aren't more concrete commitments on Cost of Disability under this commitment or Commitment 44, given that the extra Cost of Disability, and the substantial mismatch between the income provided by Disability Allowance and similar payments and these extra costs is clearly a huge driver of Ireland's disproportionate disability poverty rates. (See also comments on Commitment 44).

2. Increase Employment Rate

Please see comments above regarding the CES. There are many structural barriers to employment for disabled people which have been outlined for example in the Make Work Pay report. Addressing these structural barriers requires cross and inter-Departmental coordination, including with the Department of Health, HSE, Department of Children, Equality, Disability, Integration and Youth, Transport, Education and Higher Education, Employment etc to address issues that prevent disabled people from securing and retaining employment. These included lack of sufficient Personal Assistant hours, lack of accessible transport and workplaces, lack of right to flexible and remote working, insufficient assistive technology provision etc. Addressing the extra Cost of Disability meaningfully can also support more disabled people to take up work. The recent work in reviewing the Reasonable Accommodation Fund and consulting on the new Early Engagement approach has been welcome. The latest Roadmap update under this target indicates “A paper on disability reform proposals will be submitted to the Minister for consideration in due course”. This is quite vague both in terms of timeline and of progressing this key issue, given there are only three years left to deliver the Roadmap's commitments.

Commitment 43: Strawman Proposal

The Make Work Pay report was published in April 2017, more than five years ago. In this context, and of this commitment being included in a strategy running from 2020-2025, it would be welcome to get a more

³ <https://www.disability-federation.ie/publications/dfi-prebudget-submission-to-department-of-social-p/>

concrete timeline on plans and actions to progress this commitment, including on the consultation process that is committed to.

Commitment 44: Cost of Disability

It is quite concerning to see this action marked as 'achieved' or 'complete' under the Roadmap. Of course technically it is correct that the report on Cost Of Disability (which was already well underway before the Roadmap was published) was completed and published last year. Indeed the report is informative, comprehensive and rigorous, and gives great detail and new information on the Cost Of Disability, and so it is certainly a significant achievement in its own right. However at a practical level, the report has simply documented the problems created by the Cost of Disability for disabled people and the economic challenges they experience as a result of it (which disability organisations have been highlighting for decades) across more than 150 pages. Its publication has not done anything to improve the situation of disabled people in concrete terms. What is missing from the Roadmap is **commitment to a set of actions to address the problems and issues of income and poverty created by the Cost of Disability and documented so effectively by the report. The Department of Social Protection must now act on the report and its recommendations**, including crucially addressing the insufficient income provided to disabled people unable to work, and those who care for them, in the context of extra costs averaging €8,700 and €12,700 and unaffordable extra costs of €2,706. The higher end of that estimate is more than the basic annual income provided by Disability Allowance.

DFI and other organisations have long called for the introduction of a Cost of Disability payment for disabled people in recognition of these extra costs. The one-off "Disability Support Grant" in Budget 2023 was welcome, as was Minister McGrath's acknowledgement in his Budget speech of the extra Cost of Disability. However the extra Cost of Disability existed long before the current cost of living crisis, and is not a one-off. This Budget 2023 one-off payment needs to become annual, as the extra costs will not disappear for disabled people if inflation ceases. Moreover, at its current rate of €500 the Disability Support Grant only addresses about 1/20th of the cost outlined in the INDECON report (figures that it should also be remembered were calculated before the recent inflation spike, and thus will have escalated significantly). The government will simply not be able to deliver on the poverty reduction or increased employment targets under Commitment 42 without taking significant and meaningful action on Cost of Disability.

7. Broader Poverty Recommendations

DFI is a member of EAPN Ireland and endorses its broader submission which focuses on and highlights a range of systemic issues that perpetuate poverty. We support the broader points made by EAPN, SVP and other anti-poverty organisations as regards an outcome and action focus being required under each target and commitment and the need to drill down beyond averages to look at certain at risk groups. Given the Roadmap's focus on child poverty we would also highlight the 2021 ESRI research on the dynamics of child poverty which found that children with disabled parents are more likely to live in persistent poverty, and this is especially true where the parent cannot work due to their disability.⁴ The report also found that children living in poverty are twice as likely to have a chronic condition or disability. It concludes that families where the primary caregiver is disabled, and particularly where the mother is disabled, "are at a high risk of becoming trapped in poverty and this warrants additional policy intervention."⁵ More recent research looking at intergenerational poverty reaches similar conclusions.⁶

Benchmarking Social Welfare Rates: Minimum Essential Standard of Living (MESL)

Developments in recent years, most notably the setting of the PUP at a much higher rate than our standard social protection payments and the clear positive impact this had on poverty rates in 2021, again spotlight the ongoing question of the indexing of social welfare rates. This is an issue which is consistently highlighted by anti-poverty groups, and the key consensus issue across attendees every year at the Department of Social Protection's Pre Budget Forum. Our current social protection rates are below the poverty line, and did not even rise in line with inflation for 2023, meaning those who rely on social protection to survive will experience a real-term cut in income next year. Benchmarking of social welfare payments should be set at the rates recommended by the Minimum Essential Standard of Living (MESL) Project, in order to ensure everyone has enough to live a decent and dignified life. The benchmark rate must be set above the poverty line and **must take the Cost of Disability into account**. Once the benchmark is established, it will be

⁴ ESRI, *The dynamics of child poverty in Ireland: Evidence from the Growing Up in Ireland survey*, 2021, p42. <https://www.esri.ie/publications/the-dynamics-of-child-poverty-in-ireland-evidence-from-the-growing-up-in-ireland>. "The model allows us to differentiate between different types of non-employment and reveals that the mother's inability to work due to illness or disability is the strongest predictor of both transient and persistent EV. While this is a small group (circa 1 per cent of families in wave 1), **their very high risk of poverty is of policy concern** [our emphasis]".

⁵ ESRI, op cit, p 74.

⁶ <https://www.esri.ie/news/childhood-poverty-associated-with-higher-risk-of-material-deprivation-and-income-poverty-in>

possible to index social welfare rates for people with disabilities. To move to benchmarking payments without doing this first would have the unintended consequence of locking people into greater structural poverty.

8. Answers to Consultation Questions

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?

The reduction in the overall population living in consistent poverty since the publication of the Roadmap for Social Inclusion 2020 has shown that progress can be made. It has also shown how effective our social protection system can be, if we provide an adequate income to those who depend on it, as we did during the pandemic via the PUP payment. Moreover the setting of specific targets, and the process of reviewing and reporting on them via the Roadmap Report card, has focused attention on poverty reduction, and given a clear set of targets to work towards and measure.

However the general poverty reduction achievements are not mirrored in the experience of disabled people. In fact, as the first Progress Report shows, EU AROPE rates actually disimproved during the first monitoring period. Moreover 2021 national CSO SILC data also shows disability poverty disimproving during the Roadmap period - in 2021 there was an increase across at risk of poverty, deprivation and consistent poverty for those unable to work due to long-standing health problems (disability). Alarmingly, the consistent poverty rate increased from 16.2% to 19.2%, while the national average declined from 4.6% to 4%⁷.

The publication of the Cost of Disability report was also an important development during this period.

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

Over the past two years we have seen the power and capacity of Ireland's social protection system to protect people from poverty, through the use of the €350 PUP, which successfully protected hundreds of thousands of people and their families from poverty, as the 2021 SILC data shows. It was a striking reminder of the capacity of the state to protect people from poverty, but also prompted the question as to **why other groups in society, such as those unable to work due to disability, are expected to live on a much lower income for the rest of their lives.** The recent decision in Budget 2023 to provide short-term "Cost of Living" support to people in receipt of financial supports from the Department of

⁷ [Poverty and Deprivation - CSO - Central Statistics Office](#)

Social Protection is welcome, however there needs to be a longer term focus and plan to deliver permanent improvements in economic situation for disabled people and others living in poverty into the future.

The active and focused engagement of the Minister of State with responsibility for the Roadmap has been extremely important in securing attention, senior engagement and strong reporting against the Roadmap's commitments. The comprehensive reporting (albeit a bit late to start, but running regularly now) has been very useful, and in particular the focus on data has been effective to support careful monitoring. The data tables in the Progress report, the focus on EU rankings, and the summary and focus on which rankings improved or disimproved has helped to highlight areas needing further focus and attention (such as disability).

The civil society members of the Roadmap Steering Group have also done an excellent job of sharing information and securing input from broader civil society on the progress (or lack thereof), under the Roadmap.

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?

Our earlier responses have fairly comprehensively covered this issue. A focus on averages obscures attention being paid to those groups who are most at risk of poverty. For example, the topline aim and focus of the Roadmap is to reduce consistent poverty from its current rate of 4% to 2%, and yet those unable to work live with a consistent poverty rate of 19.2%, making starkly clear why a focus on them is urgently required. Despite there being clear commitments to % decreases in disability poverty and employment, there is a lack of action plans and strategies underpinning these targets, or any indication in the Roadmap of what steps will be taken to secure these improvements by 2025.

At a practical level the usual issues which occur regarding coordinating both at an internal Department level, and across different Departments, have hampered a more effective and meaningful focus on poverty reduction, as well perhaps as the fact that the Minister with responsibility for the policy is not sitting at Cabinet. The Roadmap does not appear to have sufficient resourcing behind it either, both in terms of sufficient staff in the Department to be able to really progress and drive implementation and delivery of the targets, and of the budgetary and financial allocations and commitments required to deliver on its ambitions.

Moreover there seems to be within the system an inherent acceptance that certain cohorts of society are inevitably destined to live in poverty, despite there being clear popular, public (see 2021 Citizen's Assembly

recommendations) and parliamentary support for the state to provide social protection support that enables people to live a dignified life⁸.

Another issue is that while the government indicates that poverty impact, equality and disability-proofing assessments of policy measures take place for Budgets, disability and anti-poverty organisations would question how effective these assessments are. In particular, it appears that the SWITCH model used to assess the impact of Budget decisions on those living in poverty cannot consider disability as part of its modelling. This is concerning given that disabled people are so disproportionately at risk of poverty, and that this model is cited annually as the key tool used to assess the poverty impact of Budget choices.

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?

As previously stated, disabled people are clearly caught in a poverty trap, with significantly higher costs than others who rely on the social protection system to survive, and more barriers to employment. The statistics show that people with disabilities are now 4-5 times more likely to live in consistent poverty, at risk of poverty, and in deprivation. A focus on this group of people is crucial both to deliver on the disability specific targets, and the overall consistent poverty reduction target. Action on Cost of Disability is imperative if Ireland is to reduce disability poverty rates, and is long overdue, this being something that disability organisations have been calling for for decades.

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.

See comments above on specific Commitments. The Roadmap commitments on disability are very focused on poverty and employment, but a holistic view that considers housing, transport, health and social care supports, Personal Assistance, assistive technology etc is more likely to deliver real social inclusion for disabled people.

⁸ Recommendation 4-7, 10 -12, p 60, <https://www.citizensassembly.ie/en/about-the-citizens-assembly/report-of-the-citizens-assembly-on-gender-equality.pdf>. Also https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_disability_matters/reports/2022/2022-03-10_report-on-ensuring-independent-living-and-the-united-nations-convention-on-the-rights-of-persons-with-disabilities_en.pdf, page 101. And <https://www.oireachtas.ie/en/debates/debate/dail/2022-07-06/8/>.



DFI's vision

An Ireland where people with disabilities are participating fully in all aspects of society.



DFI's mission

DFI is a federation of member organisations working with people with disabilities to implement the UN CRPD and ensure their equal participation in society.



Four-year goal

Member organisations are actively involved in DFI, working to implement the UN CRPD and to achieve the equal participation of people with disabilities in society.

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