

Better Outcomes: Brighter Futures

NGO Sub-Group on Child Poverty

Submission on Actions to Achieve the Child
Poverty Reduction Target

September 2018





Never give up on a child. Ever

Introduction

In April 2014, the Government set a national child poverty reduction target and committed to adopting a multidimensional approach to tackle child poverty.¹ This pledge forms part of Ireland's commitment to radically reduce poverty by 2020 under the European Commission *Europe 2020* strategy.²

The Government's child poverty reduction target outlined in *Better Outcomes, Brighter Futures: The National Policy Framework for Children and Young People 2014-2020*, seeks to reduce the number of children living in poverty by at least two-thirds on 2011 levels.³ The most recent Survey on Income and Living Conditions (SILC) from 2016 demonstrates that children are most vulnerable to poverty, with 11.1 per cent of children living in consistent poverty, while another 19.3 per cent of children were at risk of poverty.⁴ In order for the Government to meet its target, approximately 102,000 children must be lifted out of consistent poverty by 2020.⁵

To support the Government in achieving its child poverty target, a child poverty subgroup was established under the auspices of the *Better Outcomes, Brighter Futures* National Advisory Council for Children and Young People in October 2015. The subgroup was comprised of both statutory and non-governmental (NGO) representatives⁶ and was co-convened by the Department of Social Protection and the Children's Rights Alliance. The subgroup developed a paper based upon the European Commission's *Recommendation on Investing in Children* to inform the whole of government approach to tackling child poverty in Ireland which was adopted by the Advisory Council in November 2016 and published in May 2017. A number of recommendations included in the paper were also reflected in some key announcements in Budgets 2017 and 2018.

In October 2017, the Department of Employment Affairs and Social Protection, in conjunction with partner departments, published a paper detailing the whole of government approach to tackling child poverty. Its approach is based upon the European Commission's *Recommendation on Investing in Children* and 'emphasises the need for a combined approach to tackling child poverty levels in Ireland, involving both income supports and services'.⁷ It is welcome that the Government is utilising the three pillar approach outlined in the *Recommendation* (access to resources; access to services; and children's right to participate) as research demonstrates that countries who do so perform the best in reducing child poverty.⁸ Alongside income supports and the provision of services, the paper also prioritises improving employment prospects for parents as a way of reducing child poverty.⁹ This approach reflects research which has found that work attachment and economic activity provide an effective protection against the risk of poverty.¹⁰

This paper is an update to the previous paper of the subgroup. It takes into account the whole of government approach outlined by the Department of Employment Affairs and Social Protection and the measures in the previous two Budgets that have a direct impact on children. It also takes into account existing financial commitments made by the current Government, in particular those related to *Rebuilding Ireland: An Action Plan for Housing and Homelessness* which commits to

1 Department of Children and Youth Affairs, *Better Outcomes, Brighter Futures: The National Policy Framework for Children and Young People 2014-2020* (Department of Children and Youth Affairs 2014). Commitments 4.1 and 4.2, 93.

2 European Commission, *Communication from the Commission Europe 2020: A Strategy For Smart, Sustainable And Inclusive Growth* (Brussels, 3.3.2010 Com(2010) 2020 Final).

3 Department of Children and Youth Affairs, *Better Outcomes, Brighter Futures: The National Policy Framework for Children and Young People 2014-2020* (Department of Children and Youth Affairs 2014) p 93.

4 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2016* (CSO 2017).

5 Department of Employment Affairs and Social Protection, *Better Outcomes Brighter Futures: Whole of Government Approach to Tackling Child Poverty October* (DEASP 2017) 6.

6 Barnardos, ISPC, National Youth Council of Ireland, One Family, Early Childhood Ireland, Saint Vincent de Paul, Children's Rights Alliance.

7 Department of Employment Affairs and Social Protection, *Better Outcomes Brighter Futures: Whole of Government Approach to Tackling Child Poverty October* (DEASP 2017) 4.

8 Department of Social Protection, *Who are the children living in consistent poverty?* (unpublished communication 2015), p 5.

9 Department of Employment Affairs and Social Protection, *Better Outcomes Brighter Futures: Distilled Paper on Whole of Government Approach to Tackling Child Poverty* 4.

10 Andr G bos, *Successful policy mixes to tackle child poverty: an EU-wide comparison*, AIAS, GINI Discussion Paper 76 (2013) 27.

investing €6 billion to deliver 50,000 social housing units by 2021¹¹ to address the current family homelessness crisis, as well as the money committed in the *National Development Plan* for education and investment in early years infrastructure.¹² Using the *Recommendation on Investing in Children* our paper proposes a set of key policy and budgetary recommendations in relation to supporting parents' participation in the labour market, adequate living standards through a combination of benefits, early childhood education and care, education, health, housing and prevention and early intervention. Noting that lone parent families and families with disabilities often have the highest rates of consistent poverty, in particular impacting on their children, the paper specifically looks at measures that may help to lift these families out of poverty. One of the key ways in which the Government can address child poverty is through measures that will reduce the deprivation faced by children living in poverty. These 11 deprivation indicators, used to compile the EU SILC data, focus on the basic needs of children namely access to adequate and nutritious food, being able to buy new, warm and quality clothing, living in a heated home as well as addressing the social exclusion aspects of poverty.¹³

Ireland has an international obligation under Article 27 of the UN Convention on the Rights of the Child (UNCRC) to 'recognize the right of every child to a standard of living adequate for the child's physical, mental, spiritual, moral and social development'. The UNCRC calls on States to:

[...] take appropriate measures to assist parents and others responsible for the child to implement this right and shall in case of need provide material assistance and support programmes, particularly with regard to nutrition, clothing and housing.¹⁴

Growing up in poverty has a devastating and lasting impact on children's lives. It negatively impacts on their wellbeing,¹⁵ increases their risk of socio-emotional developmental problems¹⁶ and leads to educational inequalities, with children experiencing poverty being disproportionately affected by learning disabilities and speech and language difficulties.¹⁷ Many experience greater school absenteeism and lower expectations of going on to third level education.¹⁸ It also leads to health inequalities as children experiencing poverty have poorer health in general and are less likely to access medical treatment due to long waiting lists for services.¹⁹

Addressing poverty and social exclusion, in particular among children and young people, must become a core political obligation and not just a possible policy choice. It is a central tenet of creating a more equal, prosperous and just Ireland.

11 Rebuilding Ireland, *Action Plan for Housing and Homelessness* (DHPLG 2016) 106.

12 Department of Public Expenditure and Reform, *Project 2040 National Development Plan* (DPER 2018) 86 and 93.

13 Central Statistics Office, 'Survey on Income and Living Conditions', <<https://bit.ly/2L4lzf7>> accessed 10 July 2018. The 11 basic deprivation indicators include: (1) Two pairs of strong shoes; (2) A warm waterproof overcoat (3) Buy new (not second-hand) clothes; (4) Eat meal with meat, chicken, fish (or vegetarian equivalent) every second day; (5) Have a roast joint or its equivalent once a week; (6) Had to go without heating during the last year through lack of money; (7) Keep the home adequately warm; (8) Buy presents for family or friends at least once a year; (9) Replace any worn out furniture; (10) Have family or friends for a drink or meal once a month; and (11) Have a morning, afternoon or evening out in the last fortnight for entertainment. Individuals who experience two or more of the 11 listed items are considered to be experiencing enforced deprivation.

14 UN General Assembly, Convention on the Rights of the Child (20 November 1989) 1577 UNTS 3 (UNCRC) Art 27.

15 Wilkinson, Richard and Kate Pickett, *The Spirit Level: Why More Equal Societies Almost Always Do Better* (Allen Lane 2009).

16 Smyth, Emer, *Wellbeing and School Experiences among 9- and 13-Year-Olds: Insights from the Growing Up in Ireland study* (ESRI 2015) <<https://www.esri.ie/pubs/BKMNEXT291.pdf>> accessed 11 July 2018.

17 Hearne, Rory and Cian McMahon, *Cherishing All Equally 2016 Economic Inequality in Ireland* (TASC 2016).

18 Byrne, Delma and Smyth, Emer, *No Way Back? The Dynamics of Early School Leaving* (The Liffey Press & ESRI 2010).

19 Wilkinson, Richard and Kate Pickett, *The Spirit Level: Why More Equal Societies Almost Always Do Better* (Allen Lane 2009).

2. Priority Recommendations

To support parents' labour market participation, in Budget 2019 the Government should:

- Restore the value of the weekly income disregard to 2011 levels, in line with increased national minimum wage and inflation rates, to €161.40 for all lone parents receiving the One Parent Family Payment, Jobseekers Transitional Payment and Jobseekers Allowance. Estimated cost: €27 million.
- Reduce the Working Family Payment weekly work threshold from 19 hours to 15 hours for lone parents in recognition of the difficulty they face in reaching the threshold alone.

To ensure a child's right to an adequate standard of living, in Budget 2019 the Government should:

- To help offset the higher costs faced by families with older children, begin by introducing a higher Qualified Child Increase (QCI) rate for children over 12 years beginning with a €5.00 increase in Budget 2019. Estimated cost: €35million.
- Increase the weekly Direct Provision allowance for children to €31.80 in line with the QCI rate and ensure any further increases apply to this group of children. Estimated cost: an additional €811,720.
- Introduce an individually assessed cost of disability payment to provide for the extra costs of living with a disability for children as well as adults. This benefit should be available to all persons with a disability and not only those in receipt of social welfare payments.

To ensure a child's right to early childhood education and care, in Budget 2019 the Government should:

- Ensure that an appropriate mechanism is put in place to identify vulnerable children who would benefit developmentally from 40 hours in a quality ECEC setting but who do not currently fall within the remit of s.14 of the Childcare Support Act 2018.
- Allocate at least €102.55 million to provide targeted childcare subsidies so that all eligible children and parents in low-income families can benefit to the fullest extent possible.

To ensure a child's right to education, in Budget 2019 the Government should:

- Increase capitation rates for primary and secondary schools in Budget 2019 to prevent parents paying voluntary contributions to cover the running costs of schools. Estimated Cost €35.2 million.
- Invest an extra €103.2 million annually to realise the constitutional right of all children to genuinely free primary education. In Budget 2019, begin by investing €20 million to provide free school books for all primary school pupils.

To ensure a child's right to health, in Budget 2019 the Government should:

- Increase Medical Card income thresholds, for the first time since 2005, to the equivalent of the highest means-tested welfare payment (currently €243.30 per week for the state pension). Increase the allowance for children under 16 to €80 in line with other social welfare payments. Automatically link Working Family Payment eligibility to Medical Card eligibility to increase the take-up by low income working families.
- To address food poverty ensure that funding allocated in the *National Development Plan 2018-2027* to build schools is contingent on including a school kitchen to provide hot nutritious meals to children. As infants and teenagers are the most costly to feed, establish pilot projects to extend the School Meals Programme to early years settings and youth services as another avenue to address food poverty for children outside of the school setting.

To ensure a child's right to shelter and housing, in Budget 2019 the Government should:

- Pursue a housing-first approach by increasing the output of built and acquired Local Authority and Approved Housing Bodies social housing units in 2019 to 9,500 as part of the *Rebuilding Ireland* commitment to invest €6 billion by 2021. In the interim period, it must provide appropriate accommodation and end the practice of 'self-accommodation' and long-term use of emergency accommodation for families with children.
- In conjunction with rent certainty measures, increase the Housing Assistance Payment and Rent Supplement limits in line with market rents to prevent more families becoming homeless.
- Increase funding for domestic violence refuges by 20 per cent. Implement the *Rebuilding Ireland* commitment to provide additional emergency refuge spaces. Estimated cost: €4.5 million.

3. Support Parents' Participation in the Labour Market

Lone parent families represent a quarter of families with children in Ireland.²⁰ Lone parents maintain a household and have to provide for their children in the same way as two-parent households, but do so with only one income. To ensure that national policies aimed at actively including lone parent families succeed, diversities in family forms must be acknowledged and flexible, and universal structures should be established which systematically generate inclusive pathways to education and employment to ensure that children of lone parents do not continue to have the highest child poverty rates. The consistent poverty rate for children of lone parents is more than double the overall consistent child poverty rate of 11.6 per cent.²¹

3.1 Support the Participation of Lone Parents in the Labour Market

The *EU Recommendation on Investing in Children* recommends that in order to reduce child poverty the State should '[s]upport the employability and participation of single parents and second earners in paid work, promoting gender equality in the labour market and in family responsibilities'.²²

Census 2016 recorded 218,817 family units headed by a lone parent with 356,203 children.²³ The rate of poverty among these families is disproportionately higher than other family types.²⁴ Over 42 per cent of lone parent households are at risk of poverty and 24.6 per cent are living in consistent poverty.²⁵ In 2017, 58.5 per cent of lone parents were at work, compared with 76 per cent of two-parent families,²⁶ yet more than half of the families headed by lone parents experience two or more types of deprivation.²⁷ There is clear evidence that lone parents still struggle to meet the cost of living for themselves and their children.²⁸

Income disregards are a crucial support for lone parents in work since a certain portion of their earned income is not considered or is 'disregarded' for the purposes of means-testing for social welfare payments. Lone parents require additional supports to ensure that they can engage in paid work while caring for their children. There are concerns that a focus on employment activation measures, for example transitioning to Jobseeker's Allowance (JA), acts as a disincentive to taking up part-time work since income disregards drop significantly in these cases.²⁹ Budget 2018 increased the income disregard for parents in receipt of One Parent Family Payment (OPFP) and Jobseeker's Transition Payment (JST) by €20 per week meaning that, from January 2018, lone parents can earn up to €130 weekly and still qualify for their full social welfare payment.³⁰ While the increase in the income disregards is welcome, the value has not been reinstated to pre-2011 levels. Increasing income disregards reduces the level of poverty experienced by one parent families and ensures that they have more available income to meet child-related expenses.

The requirement for a lone parent to seek child maintenance in order to qualify for a social welfare payment is often burdensome as they may have to go to court to seek a maintenance order.³¹ The Department of Employment Affairs and Social Protection means-tests maintenance so a lone parent's income does not necessarily increase when they receive maintenance. The current process

20 Central Statistics Office, *Census 2016 Profile 4 – Households and Families* (CSO 2017).

19 Communication received by the Children's Rights Alliance from the Central Statistics Office, 2 February 2017.

22 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

23 Central Statistics Office, *Census 2016 Profile 4 – Households and Families Infographic* (CSO 2017).

24 Fran McGinnity et al., *Winners and Losers? The Equality Impact of the Great Recession in Ireland* (Equality Authority and ESRI 2014).

25 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2016* (CSO 2017).

26 Central Statistics Office, *Quarterly National Household Survey - QNHS Households and Family Units Quarter 2 2011 - Quarter 2 2017* (CSO 2017).

27 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2016 Results* (Central Statistics Office 2017).

28 Michelle Millar & Rosemary Crosse, *Lone Parents and Activation, What Works and Why: a review of the international evidence in the Irish context* (UNESCO Child and Family Research Centre, National University of Ireland, Galway 2016).

29 Welfare.ie, Jobseeker's Allowance (Department of Employment Affairs and Social Protection) <http://www.welfare.ie/en/Pages/1057_Jobseekers-Allowance.aspx> accessed 4 July 2018>.

30 Department of Employment Affairs and Social Protection, 'Minister Doherty announces Social Welfare Budget for 2018' (Department of Employment Affairs and Social Protection, 10 October 2017) <<http://www.welfare.ie/en/pressoffice/Pages/pr101017.aspx>> accessed 4 July 2018.

31 One Family, *Invest in Services and Targeted Income Supports: Budget 2019* (One Family 2018) 7.

to seek child maintenance should be reconsidered as it fails on a policy level to address the high poverty rates experienced by one parent families.

3.2 Lone Parents and Access to Education and Housing

In 2017, the Joint Oireachtas Committee on Social Protection reviewed the specific barriers which lone parents face in attaining equal economic and social participation, while carrying the responsibility of raising their children alone.³² The Committee, noting the varied levels of education of lone parents and the particular barriers to education faced by lone parents, examined the tension between an 'education first', or 'work first' approach to labour market activation.³³ The Committee recommended that lone parents should not be required to be unemployed or in receipt of a social welfare payment for a period of time before accessing educational grants.³⁴

Lone parents returning to education can avail of a number of supports. However, there are anomalies operating across the education and income supports available in relation to Student Universal Support Ireland (SUSI) grants which may act as a disincentive to a lone parent entering into education. The SUSI grant provides means-tested maintenance and fee grants for students attending full-time higher and further education. The Back to Education Allowance (BTEA) – targeted at social welfare recipients who are unemployed, parenting alone, or have a disability – supports participation of lone parents in second- or third-level education courses.³⁵

Lone parents in receipt of One Parent Family Payment (OPFP) or Jobseekers Transitional Payment (JST) are eligible to apply for a SUSI maintenance grant in addition to a SUSI grant to cover their fees. However, if they are granted these supports they can no longer avail of Rent Supplement unless they transfer to the BTEA.³⁶ Under the BTEA rules, lone parents will not be eligible to receive the SUSI maintenance grant to cover their living expenses which could result in them receiving inadequate income to continue their education while at the same time supporting their children. In contrast, lone parents who are living in social housing or in receipt of Housing Assistance Payment (HAP) can retain their OPFP/JST payments, receive the SUSI maintenance grant and continue to receive support for their housing costs. This anomaly creates an inequity between lone parents on different payment types.

The range and complexity of the anomalies around education supports and housing supports indicate a need to rationalise and integrate these policies and procedures into one straightforward procedure. Education supports should be designed to adapt to the complexities of lone parents' circumstances in order to create equitable pathways out of poverty. There is a clear need for cooperation between the Departments of Education and Skills and Employment Affairs and Social Protection in order to enable lone parents to return to education without jeopardising their home, or pushing the family further into poverty. To this end, a coherent strategy for supporting lone parents into education at all levels is needed, in line with the commitment to establish a single consolidated means-testing body outlined in *A Programme for a Partnership Government*.³⁷

Recommendations

- Restore the value of the weekly income disregard to 2011 levels, in line with increased national minimum wage and inflation rates, to €161.40 for all lone parents receiving the One Parent Family Payment, Jobseekers Transitional Payment and Jobseekers Allowance. Estimated cost: €27 million.
- Reduce the Working Family Payment weekly work threshold from 19 hours to 15 hours for lone parents in recognition of the difficulty they face in reaching the threshold alone.

32 Joint Committee on Social Protection, *Report on the Position of Lone Parents in Ireland* (Houses of the Oireachtas 2017) 24.

33 Joint Committee on Social Protection, *Report on the Position of Lone Parents in Ireland* (Houses of the Oireachtas 2017) 6.

34 Joint Committee on Social Protection, *Report on the Position of Lone Parents in Ireland* (Houses of the Oireachtas 2017) 40.

35 Additional supports include the Part-time Education option, the Vocational Training Opportunities Scheme (VTOS) or the Education, Training and Development option.

36 Citizens Information 'Back to Education Allowance', <<https://bit.ly/14XJMOB>> accessed 5 July 2018.

37 Department of the Taoiseach, *A Programme for a Partnership Government 2016* (Department of the Taoiseach, 2016) 77.

- Ensure all lone parents eligible for One Parent Family Payment/Job Seekers Transition, and the SUSI maintenance grant, have access to Rent Supplement. Secure housing is a prerequisite for course completion and a stable family life.

4. Adequate Living Standards Through a Combination of Benefits

4.1 Deliver Targeted Benefits in a Way that Differentiates between Children's Needs

The *EU Recommendation on Investing in Children* recommends that the State '[d]eliver means-tested or other targeted benefits in a way that avoids stigmatisation, differentiates between children's needs'.³⁸

Older child aged between 12 and 17 years are more likely to experience poverty than younger children.³⁹ The cost of providing a child with a Minimum Essential Standard of Living (MESL) varies according to age.⁴⁰ The MESL, as developed by the Vincentian Partnership for Social Justice, is a standard of living which meets an individual's/household's physical, psychological and social needs, at a minimum but acceptable level.⁴¹ It costs an average of €122 per week to provide a minimum socially acceptable standard of living for an older child; over 63 per cent more than the costs for younger children.⁴² The increased costs of raising an adolescent are associated with food, personal care, clothing and social inclusion.⁴³ Less than €10 of the additional cost is related to education costs.⁴⁴

The basic deprivation indicators include three indicators related to clothing: owning two pairs of strong shoes, a warm waterproof coat and being able to buy new rather than second-hand clothes.⁴⁵ The Back to School Clothing and Footwear Allowance presents a way to pragmatically and specifically address these three indicators through providing funding for parents to ensure that their child has sufficient clothing. Notably two different rates are already paid for younger and older children.⁴⁶

Currently social welfare supports provide for 89 per cent of a younger school age child's minimum needs, but only 56 per cent of minimum needs of an older child.⁴⁷ Additional targeting for older children within the social welfare system would assist low income families with the additional costs of raising an older child and contribute to the poverty reduce target.

Recommendations

- To help offset the higher costs faced by families with older children, begin by introducing a higher Qualified Child Increase (QCI) rate for children over 12 years beginning with a €5.00 increase in Budget 2019. Estimated cost: €35 million.⁴⁸

4.2 Adequate Income for Families with Children Living in Direct Provision

The *EU Recommendation on Investing in Children* recommends that the State '[s]upport family incomes through adequate, coherent and efficient benefits'.⁴⁹

38 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <<http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>>.

39 Department of Social Protection, *Who are the children living in consistent poverty?* (unpublished communication 2015).

40 Dr. Bernadette Mac Mahon D.C. & Robert Thornton Minimum, *Essential Standard Of Living & National Minimum Wage Inadequacy: A Vincentian Partnership for Social Justice Submission to The Low Pay Commission* (Vincentian Partnership for Social Justice 2015) 1.

41 Dr. Bernadette Mac Mahon D.C. & Robert Thornton Minimum Essential Standard Of Living & National Minimum Wage Inadequacy: A Vincentian Partnership for Social Justice Submission to The Low Pay Commission (Vincentian Partnership for Social Justice 2015) 1.

42 Vincentian Partnership for Social Justice, *Preliminary Pre-Budget 2019 Submission: Minimum needs of Older Children* (VPSJ 2018) 1.

43 Vincentian Partnership for Social Justice, *Preliminary Pre-Budget 2019 Submission: Minimum needs of Older Children* (VPSJ 2018) 2.

44 Vincentian Partnership for Social Justice, *Preliminary Pre-Budget 2019 Submission: Minimum needs of Older Children* (VPSJ 2018) 2.

45 Central Statistics Office, 'Survey on Income and Living Conditions', <<https://bit.ly/2L4lf7>> accessed 10 July 2018.

46 Department of Employment Affairs and Social Protection, 'Back to School Clothing and Footwear Allowance' <<https://bit.ly/2qMx6Wb>> accessed 10 July 2018. The rate of payment for children aged four to 11 is €125 while the rate of payment for children 12 to 22 years (in full-time secondary education) is €250.

47 Vincentian Partnership for Social Justice, *Preliminary Pre-Budget 2019 Submission: Minimum needs of Older Children* (VPSJ 2018) 2.

48 This is calculated by deriving the proportion of children over 12 in receipt of the Back to School Clothing and Footwear Allowance, adjusting for the number of children age under 4, and applying this to the number of children in receipt of the QCI including half rates.

Asylum seeking children living in Direct Provision centres are at high risk of consistent poverty.⁵⁰ Families living in Direct Provision receive room and board (usually within former hotels, hostels or other large buildings) and a weekly allowance of €21.60 per adult and €21.60 per child.⁵¹ Asylum-seekers are not entitled to receive the Child Benefit payment.⁵²

The *EU Recommendation* calls on States to ‘acknowledge the strong link between parents’ participation in the labour market and children’s living conditions’.⁵³ The welcome decision of the Government to opt-in to the Recast Receptions Directive means that people in the asylum process will be entitled to seek employment if they have not received a first instance recommendation on their status within nine months.⁵⁴ However, those who are waiting a decision on their appeal will be precluded from entering employment. It is welcome that children under the age of 18 will retain their Direct Provision Allowance even where their parent may be working.⁵⁵ Parents who are working may also be eligible for the Working Family Payment to supplement their income.⁵⁶

In January 2016, the Department of Social Protection raised the child component of the allowance by €6.00 from €9.60 to €15.60 per week.⁵⁷ This represented the first increase in the payment in 16 years. In June 2017, this was further increased to €21.60, along with a €2 increase in adult payments.⁵⁸ While these increases are warmly welcome, it falls short of the weekly figure of €29.80 recommended by the Mc Mahon report.⁵⁹ It is critical that the payment keeps pace with increases in the Qualified Child Increase on social welfare payments, now set at a rate of €31.80.

Recommendation

- Increase the weekly Direct Provision allowance for children to €31.80 in line with the QCI rate and ensure any further increases apply to this group of children. Estimated cost: an additional €827,954.⁶⁰

49 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

50 Samantha K. Arnold (2012) *State Sanctioned Child Poverty and Exclusion*, Dublin: Irish Refugee Council.

51 Citizens Information, Services and entitlements for people seeking asylum (*Citizens Information*) <<https://bit.ly/2gETCi3>> accessed 4 July 2018.

52 The payment is subject to the Habitual Residence Condition (HRC), an additional qualifying condition attached to all means-tested payments and Child Benefit. The Social Welfare (Consolidated) Act 2005 (as amended) provides that no one seeking asylum or another form of protection can satisfy the HRC. However, in June 2018, the Court of Appeal found that the non-payment of child benefit to an Irish citizen child on the basis of the parent’s immigration status is unconstitutional. A formal declaration of unconstitutionality has been suspended for six months. Mary Carolan, ‘Non-payment of benefit to Irish child (3) in direct provision unconstitutional’ *The Irish Times* (June 5 2018).

53 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <<http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>>.

54 Department of Justice and Equality, ‘Minister Flanagan and Stanton announce enhanced access to the labour market for asylum seekers’ <<http://www.justice.ie/en/JELR/Pages/PR18000213>> accessed 4 July 2018.

55 Sarah Bardon, ‘Asylum Seekers nine months in Ireland will be allowed to work’ (*The Irish Times* 27 June 2018)

56 Department of Justice and Equality, *Information Booklet: Labour Market Access for International Protection Applicants* (DOJ 2018) 5.

57 Department of Social Protection, ‘Government announces increase in the Direct Provision Allowance for Children’ (5 January 2016) accessed 29 January 2016.

58 Department of Employment Affairs and Social Protection, ‘Tánaiste & Minister Varadkar increase payments for children & adults in Direct Provision’ (Welfare, 14 June 2017) <<https://www.welfare.ie/en/pressoffice/Pages/pa140617.aspx>> accessed 4 July 2018.

59 Department of Justice and Equality, *Working Group to Report to Government on Improvements to the Protection Process, including Direct Provision and Supports to Asylum Seekers* (Department of Justice and Equality 2015) para 5.30.

60 This calculation is based on the Reception and Integration Agency July Statistics. Using these statistics, 1,561 children would receive a weekly increase of at least €10.20.

4.3 Adequate Income for Families with Disabilities

The *EU Recommendation on Investing in Children* recommends that the State '[e]nsure that the design of and eligibility to financial support for children reflects the development of living arrangements and provides adequate redistribution across income groups'.

Families with disabilities face one of the highest rates of poverty and deprivation in Ireland. Figures from the EU Survey on Income and Living Conditions (SILC) figures from 2016 show that 39.1 per cent of people with disabilities were at risk of poverty, while 26.3 per cent lived in consistent poverty.⁶¹ The deprivation rate for persons with disabilities was 46.7 per cent in 2016.⁶²

The higher rates of poverty for persons or families who have a member with a disability is often due to the economic cost associated with having a disability.⁶³ People with disabilities are less likely to attend further education or be in employment.⁶⁴ Those who are in employment typically have lower take-home earnings.⁶⁵ Living with a disability is often accompanied with higher living costs due to additional needs.⁶⁶ In order for a person with a disability to achieve the same standard of living as an able-bodied person, they will have to spend between 35.4 to 54.4 per cent of their income on the direct costs of their disability.⁶⁷ The current costs of disability in Ireland is estimated to be between €207 to €276 per week.⁶⁸

In Census 2016, there were 81,899 children with disabilities under the age of 18.⁶⁹ The Growing Up in Ireland research has found higher incidences of chronic illness and disability among children from lower socio-economic backgrounds with greater numbers of children being described as 'severely hampered in daily activities'.⁷⁰ The primary carer of a child with a disability is less likely to participate in the labour market especially if the child's disability is more limiting.⁷¹ Given that parental employment is often encouraged as a way to reduce child poverty rates, the primary carer's inability to work coupled with the cost of providing for a family member with a disability makes families with disabilities exceptionally vulnerable to poverty.

Recommendation

- Introduce an individually assessed cost of disability payment to provide for the extra costs of living with a disability for children as well as adults. This benefit should be available to all persons with a disability and not only those in receipt of social welfare payments.

61Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2016* (CSO 2017).

62Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2016* (CSO 2017).

63Inclusion Ireland, *Poverty and Disability* (Inclusion Ireland 2017) 5.

64Inclusion Ireland *Poverty and Disability* (Inclusion Ireland 2017) 4.

65Inclusion Ireland *Poverty and Disability* (Inclusion Ireland 2017) 4.

66Inclusion Ireland *Poverty and Disability* (Inclusion Ireland 2017) 4.

67John Cullinan, 'The Economic Costs of Disability for Families' (Frontline Magazine 2015).

68 Inclusion Ireland, *Poverty and Disability* (Inclusion Ireland 2017) 5.

69 Central Statistics Office, *Census 2016 Profile 9 – Health, Disability and Carers*(CSO 2017).

70Economic and Social Research Institute, *Growing up in Ireland: Key Findings No.4 the Health of 9 Year Olds* (ESRI 2009).

71 John Cullinan, 'The Economic Costs of Disability for Families' (Frontline Magazine 2015).

5. Early Childhood Education and Care

The *EU Recommendation on Investing in Children* recommends investing in early childhood education and care in order to reduce inequalities at a young age.⁷² The Recommendation also calls on Member States to:

Adapt the design and eligibility criteria of childcare services to increasingly diverse working patterns, thereby helping parents maintain their work commitments or find a job, whilst keeping a strong focus on the child's best interests.⁷³

In May 2018, the European Commission in its Country Specific Recommendations called on Ireland to '[e]nsure the timely and effective implementation of the National Development Plan, including... affordable quality childcare'.⁷⁴ Since 2014, Ireland has received annual recommendations from the European Commission on the need to provide quality affordable childcare yet Ireland still has some of the highest childcare costs in the Europe Union.⁷⁵

5.1 Provide Accessible, Affordable, High-Quality Early Childhood Care and Education

The *EU Recommendation on Investing in Children* recommends that the State 'provide access to high-quality, inclusive early education and care; ensure its affordability and adapt provision to the needs of families'.⁷⁶

In October 2016, the Minister for Children and Youth Affairs announced the Affordable Childcare Scheme (ACS),⁷⁷ intended as a financial support to parents by making Early Childhood Education and Care (ECEC) and School-Age Childcare (SAC)⁷⁸ services more affordable.⁷⁹

The ACS will amalgamate four existing targeted childcare programmes and replace them with a single, streamlined, and more user-friendly funding programme. The new scheme will provide Ireland's first clear legal entitlement to parents to a universal childcare subsidy in respect of children under three years and the first income-based targeted childcare subsidies⁸⁰ for parents of children aged six months to 15 years.⁸¹ The aim of the ACS is to provide a robust and flexible platform for future investment in childcare in line with the principle of progressive universalism underlying *Better Outcomes, Brighter Futures*.⁸² The Department of Children and Youth Affairs envisages that the

72 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

73 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

74 Council of the European Union, *Council Recommendation on the 2018 national reform programme of Ireland and delivering a Council opinion on the 2018 stability programme of Ireland* COM(2018) 407 final 7.

75 Council of the European Union, *Council Recommendation 2016/328/EC on the 2016 national reform programme of Ireland and delivering a Council opinion on the 2016 stability programme of Ireland* COM(2016) 328 final 7.

76 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

77 Department of Children and Youth Affairs, 'Budget 2017: Department of Children and Youth Affairs Statement by Dr Katherine Zappone, Minister for Children and Youth Affairs' (11 October 2016) <<http://bit.ly/2Aujbsl>> accessed 20 October 2017.

78 'Childcare which encompasses a wide range of non-scholastic, safe, structured programme offerings for school-going children aged four to 12 years, whether provided by childminders or in formal settings. The service operates outside of normal school hours, i.e., before school, after school and during school holidays, excluding the weekends. The main purpose of the service is to promote children's holistic development and to care for children where their parents are unavailable.' Department of Children and Youth Affairs and Department of Education and Skills, *Action Plan on School Age Childcare* (DCYA/DES 2016) 11.

79 Department of Children and Youth Affairs, 'Budget 2017: Q&A on the Affordable Childcare Scheme' <<http://bit.ly/2jOQINT>> accessed 23 October 2017. A different funding model – flat-rate public capitation per child for 15 hours per week, 38-weeks per year – is in operation to support access to the Free Preschool Year for children aged three-years and up to primary school entry.

80 Universal programmes are available to children regardless of parents' income or employment status; eligibility for targeted programmes is determined by factors such as parental income or employment status, or membership of a social group.

81 A universal annual subsidy of up to €1,080 is available for all children between the ages of six months and three years/commencement Free Pre-school Scheme. Parents of children aged six months to 15 years, with annual incomes of up to €47,500, may also qualify for a means-tested targeted subsidy. Department of Children and Youth Affairs, 'Budget 2017: Q&A on the Affordable Childcare Scheme' <<http://bit.ly/2jOQINT>> accessed 23 October 2017.

82 The Department of Children and Youth Affairs, *Policy Paper on the Development of a new Single Affordable Childcare Scheme*, (DCYA 2016) 4.

Affordable Childcare Scheme will contribute to the inter-related objectives of promoting a reduction in child poverty, positive child development outcomes, labour market activation and improved quality in childcare.⁸³

Section 13 of the Childcare Support Act 2018 empowers the Minister to make regulations to include 'the maximum number of hours in respect of which an applicant may qualify for financial support'.⁸⁴ Based on child development research which demonstrates that the benefits of early care and education are, for most children, achieved through a child's part-time participation in a quality setting,⁸⁵ the Department of Children and Youth Affairs are proposing that under the regulation parents not engaged in work or study will be eligible for a maximum of 15 hours per week per child of ACS childcare subsidies as opposed to up to 40 hours for families where both parents are engaged in work or study (or one parent in the case of a one-parent family).⁸⁶

Children who grow up in households with low work intensity and experience high levels of poverty have poorer developmental, educational, and employment outcomes across their lifespan.⁸⁷ Early childhood care and education is one of the most effective levellers in tackling the negative impacts of poverty on a child's development.⁸⁸ Research has found that children

.... born into severe poverty are disproportionately exposed to factors that impede their psycho-motor development, socio-emotional growth and cognitive processes. When linked with deprived or neglectful family backgrounds and poorly educated parents, poverty becomes the single greatest barrier to educational achievement for children.⁸⁹

Young children from disadvantaged or unstable homes may benefit more from full-day services in a quality setting in relation to their socio-emotional development compared with their peers who access only 12 hours a week with absences or long breaks.⁹⁰ Therefore 15 hours per week of subsidised access to early childhood care and education may not be enough for vulnerable children.

Section 14 of the Childcare Support Act 2018 provides alternative eligibility and access to childcare supports for children and families that are not based on income or parental employment but instead on referrals from five statutory agencies on child development and family support grounds including Tusla, the Child and Family Agency, the Health Service Executive (HSE), the Department of Education and Skills, Local Authorities and the Department of Justice and Equality. Section 14 of the Act enables the Minister to make written agreements with these agencies to provide flexibility in the amount of financial support and number of hours for eligible children and parents. In theory this means that vulnerable children may be eligible for more than 15 hours per week, however, the success of s.14 will depend on the nature and content of the agreements made between the Minister and the statutory bodies, the implementation of these agreements, and the resources made available to the Department and the statutory bodies through the budgetary process.

While the mechanism to support vulnerable families under s.14 is welcome, there is a concern that some children may fall through the cracks as some vulnerable families may not be known to, or engage with the statutory agencies named in Schedule 2 of the Act to which s.14 of the Act

83 The Department of Children and Youth Affairs, *Policy Paper on the Development of a new Single Affordable Childcare Scheme*, (DCYA 2016) 4.

84 Childcare Support Act 2018, s(13)(2)(e).

85 The Department of Children and Youth Affairs, *Policy Paper on the Development of a new Single Affordable Childcare Scheme*, (DCYA 2016) 27.

86 Department of Children and Youth Affairs, 'Regulatory Impact Analysis of the Affordable Childcare Scheme' <<https://www.dcy.gov.ie/documents/legislation/20180313RIAAffordableChildcareScheme.pdf>> accessed 27 June 2018 11.

87 Evelyn Ring 'Ireland tops for children in jobless homes', *The Irish Examiner*, 16 March 2018.

88 GostaEsping-Andersen, 'Childhood investment and skill formation', *International Tax and Public Finance*, 15: 19-44.

89 John Bennet, *ECEC for children from disadvantaged backgrounds: findings from a European literature review and two case studies* (European Commission 2013) 5.

90 John Bennet, *ECEC for children from disadvantaged backgrounds: findings from a European literature review and two case studies* (European Commission 2013) 36.

applies.⁹¹ It is not clear how children who would benefit from greater ECEC provision for development purposes but who are not engaged with any of the five statutory agencies can otherwise be identified for enhanced ECEC hours to support their development. For example, parents who are accessing substance misuse services have identified that lack of access to flexible and affordable childcare poses a barrier to accessing treatment.⁹² They may not fall directly within the remit of any of the five statutory agencies but these children would benefit from spending more time in a quality ECEC setting.

In aiming to mitigate the damaging impacts of poverty on children and promoting labour market activation as a route out of poverty, policy makers should view access to quality childcare provision via the Affordable Childcare Scheme as an element of the holistic support required by low-income and disadvantaged families and consider an increase to the 15 hour subsidy. When finalising the design of the ACS, the Department of Children and Youth Affairs should put in place a mechanism that ensures that disadvantaged children who would benefit from 40 hours a week in a quality ECEC setting can be identified where they do not come into contact with the five named agencies under s.14 of the Childcare Support Act 2018.

While the Affordable Childcare Scheme has not yet been implemented in full, interim 'September Measures' have been introduced by the Department of Children and Youth Affairs. Alongside a universal subsidy, these measures have distributed increased means-tested childcare subsidies to parents receiving social welfare payments, on work activation schemes and parents qualifying for a GP Card, through existing childcare funding programmes.⁹³ The measures are effective at increasing the number of children and parents in low-income families benefiting from subsidies, 45,694 in 2017/2018⁹⁴ as compared with 31,000 in 2016.⁹⁵ It is imperative that sufficient budgetary allocation is made to meet the costs of the higher than expected demand for targeted subsidies.

Recommendations

- The Department of Children and Youth Affairs should ensure that an appropriate mechanism is put in place to identify vulnerable children who would benefit developmentally from 40 hours in a quality ECEC setting but who do not currently fall within the remit of s.14 of the Childcare Support Act 2018.
- Allocate €102.55 million to provide targeted childcare subsidies so that all eligible children and parents in low-income families can benefit to the fullest extent possible.⁹⁶

91 The agencies are the Health Service Executive; Tusla, the Child and Family Agency; the Department of Education and Skills; local authorities, and the Department of Justice and Equality.

92 Clara Geaney in partnership with Ballyfermot LDATF Treatment and Rehabilitation Subgroup, 'Supporting Women to Access Treatment: An exploration of women's participation in health and substance misuse services in Ballyfermot', (Dormant Funds Account 2016) 38.

93 Department of Children and Youth Affairs, 'Government announces plans for the delivery of more affordable childcare this September, Statement by the Minister for Children and Youth Affairs, Dr Katherine Zappone and Minister for Social Protection, Leo Varadkar', 12 April 2017 <https://www.welfare.ie/en/pressoffice/Pages/pr120417.aspx> accessed 3 August 2018.

94 Department of Children and Youth Affairs, 'More children receiving government funded childcare than ever before' (*Department of Children and Youth Affairs*, 27 July 2018) <<https://www.dcy.gov.ie/docs/EN/27-07-2018-More-children-receiving-government-funded-childcare-than-ever-before/4796.htm>> accessed 3 August 2018.

95 Children's Rights Alliance, *Report Card 2018* (Children's Rights Alliance 2018) 100.

96 This costing is based on the approved registration costs data for 2017/18 provided by Pobal to the Children's Rights Alliance on the 23 August 2018.

6. Improve Education Systems' Impact on Equal Opportunities

Every child in Ireland has the right to access and receive an education. This right is protected under Article 28(1) of the UN Convention on the Rights of the Child which requires states to 'recognize the right of the child to education, and with a view to achieving this right progressively and on the basis of equal opportunity' and to 'take appropriate measures such as the introduction of free education and offering financial assistance in case of need.'⁹⁷

Article 42 of the Irish Constitution requires the State to 'provide for free primary education.'⁹⁸ The Education Act 1998 guarantees 'a level and quality of education appropriate to meeting the needs and abilities of that person'⁹⁹ and 'to promote equality of access to and participation in education and to promote the means whereby students may benefit from education.'¹⁰⁰

In Ireland, a person's socio-economic background remains a strong determining factor of their level of educational attainment. Supporting educational retention, performance and attainment for all children is crucial to tackling child poverty and enabling all children and young people to reach their potential.

The announcement in Budget 2018 to increase the funding to the School Meals Programme,¹⁰¹ which now extends to non-DEIS schools,¹⁰² and the recent increase in the Back to School Clothing and Footwear Allowance rates by 25 per cent are welcome and goes some way to easing the financial burden on low income families when sending their children to school.¹⁰³ The commitment to spend €8.8 billion of capital funding on education under the *National Development Plan* again is a welcome development that will help improve the overall infrastructure and IT in schools around Ireland.¹⁰⁴

6.1 Address Financial Barriers to Education: School Costs

The *EU Recommendation on Investing in Children* recommends that the State 'provide for the inclusion of all learners, where necessary by targeting resources and opportunities towards the more disadvantaged'.¹⁰⁵

While officially under the Free Education Scheme, there are no school fees to access non-fee paying primary schools, in practice parents have to pay other essential non-discretionary costs placing additional financial pressure on low income families. Barnardos' 2017 School Costs Survey found the average cost to send a child to school ranged from €360 for a senior infant pupil, €380 for a fourth class pupil and €765 for a first year pupil in post primary school.¹⁰⁶ These costs include clothing, footwear, school books, classroom resources and the voluntary contribution fees.¹⁰⁷ Costs appear to vary depending on location despite children following the same curriculum.¹⁰⁸

97 UN General Assembly, Convention on the Rights of the Child (20 November 1989) 1577 UNTS 3 (UNCRC) Art 28(1).

98 Irish Constitution, Article 42.4.

99 Education Act 1998, Section 6(b).

100 Education Act 1998, Section 6(c).

101 Department of Finance, *Expenditure Report 2018* (Stationary Office 2018) 42.

102 Department of Education and Skills, 'Minister Varadkar & Burton announce €3 million expansion of school meals programme' (*Department of Education and Skills*, 27 March 2017) <<https://bit.ly/2Bhp4Nw>> accessed 5 July 2018.

103 Department of Social Protection, 'Minister Doherty announces details of the Back to School Clothing and Footwear Allowance Scheme for 2018' (*Welfare.ie*, 25 June 2018) <<https://www.welfare.ie/en/pressoffice/Pages/pr250618.aspx>> accessed 5 July 2018.

104 Department of Public Expenditure and Reform, *Project 2040 National Development Plan* (DPER 2018) 86.

105 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

106 Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 6.

107 Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 6.

108 Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 13.

Barnardos 2018 Survey: Average Costs in 2018 for Sending a Child to School

Average costs in 2016	Senior Infants	4 th Class	1 st Year
Clothing	€100	€115	€245
Footwear	€55	€45	€70
School Books	€75	€100	€240
Classroom resources	€40	€40	€75
Voluntary contribution	€90	€80	€135
Total	€360	€380	€765
<i>Back to School Clothing and Footwear Allowance</i>	<i>€125</i>	<i>€125</i>	<i>€250</i>

The cumulative impact of these costs results in 58 per cent of primary parents and 72 per cent of secondary school parents having to forgo other household bills or cut back on daily expenses, while seven per cent of parents borrow from friends or moneylenders to cover the costs.¹⁰⁹

While the Department of Education and Skills has an annual budget in excess of €10 billion, schools remain underfunded and rely on parents to make voluntary contributions and prop up the educational system by funding the essentials that are required for their children to complete the curriculum including books and classroom resources. Research published in 2018 found that parents subsidise the Irish education system by up to €46 million annually.¹¹⁰

6.1.1 Voluntary Contributions

Parents are often requested by their child's school to pay a 'voluntary' contribution of set amounts required to help bridge a gap between the State capitation grant and the actual cost of running the school. In April 2017 the Department of Education and Skills published a circular encouraging schools to adopt measures that would ease financial pressure on parents.¹¹¹ However, Barnardos' 2018 School Costs Survey found that the number of parents being asked to pay voluntary contributions had increased dramatically since 2017, with 67 per cent of primary school parents and 71 per cent of secondary school parents being asked for a voluntary contribution.¹¹² Parents also report being asked to pay classroom resource fees to cover items such as photocopying and art supplies.¹¹³ Without any increase to capitation funding in Budget 2018, schools have had to continue to ask parents to make up the shortfall.

6.2 Cost of School Books

In the absence of a universal scheme to support parents with the cost of schools books, each year parents spend on average €95 on books for primary school children and €220 on books for secondary school children.¹¹⁴ While the Department of Education and Skills favours the establishment of school book rental schemes to reduce the cost burden on parents who have to buy school books and workbooks, according to Barnardos' 2018 survey, the availability of these schemes is inconsistent.¹¹⁵ It reported 74 per cent of primary school parents had access to a school book rental scheme, while only 40 per cent of secondary school parents had access to a school book rental scheme.¹¹⁶

¹⁰⁹Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 4.

¹¹⁰Vivienne Clarke, 'Parents 'spent €46m' making up for school grant cuts', *The Irish Times*, 23 April 2018.

¹¹¹ Department of Education and Skills, *Circular 0032/2017 Measures to be adopted by schools to reduce the cost of school uniforms and other costs* (DES 2017).

¹¹²Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 10.

¹¹³Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 12.

¹¹⁴Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 8.

¹¹⁵Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 9.

¹¹⁶Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 9.

Funding to assist schools in the establishment and running of the school book rental schemes has remained unchanged for years and the Department notes it is insufficient.¹¹⁷ The recommendations by the Joint Oireachtas Committee on Education and Social Protection in 2013 to produce a ‘five year template for the delivery of an entirely free schoolbook system, based on the UK model’ and to discontinue the use of workbooks in all schools¹¹⁸ have not yet been implemented. Barnardos estimates that an additional annual budgetary allocation of €20 million per annum would provide free schoolbooks to all primary school pupils.¹¹⁹

Budget 2019 is an opportunity for the Government to progress its aim to make Ireland’s education system the best in Europe by 2026¹²⁰ by prioritising funding to cover the basics costs of education and ensuring all children have what they need to learn. It would further ensure that the Government upholds its constitutional duty to provide free primary school education to all children. Barnardos estimates it would cost €103 million per annum, just €185 extra per pupil, to provide genuinely free primary education.¹²¹ This investment would cover all textbooks and workbooks, remove the need for voluntary contributions, classroom resources fees, transport fees (for those availing of the School Transport Scheme) and restore the capitation rates back to 2010 levels. The cost to roll out genuinely free secondary education as was first envisaged in 1967, would be just €127 million per annum.

Barnardos 2018: Estimated Cost to Make Education Free

	Free School Books	Removing Voluntary Contribution	Free Classroom Resources	Free School Transport	Restoring Capitation Grant Level	Total
Current Exchequer Funding	€20 m	€0	€0	€163.5 m	€287 m	€470.5 m
Additional cost to make Primary Education free	€20 m	€42 m	€19.5 m	€5 m	€16.7 m	€103.2 m
Additional cost to make Secondary Education free	€20 m	€47 m	€19 m	€22.4 m	€18.5 m	€126.9 m
Additional cost to make education free for all	€40 m	€89 m	€38.5 m	€27.4 m	€35.2 m	€230.1 m

Recommendations

- Increase capitation rates for primary and secondary schools in Budget 2019 to prevent parents paying voluntary contributions to cover the running costs of schools. Estimated Cost €35.2 million.
- Invest an extra €103.2 million annually to realise the constitutional right of all children to genuinely free primary education. In Budget 2019, begin by investing €20 million to provide free school books for all primary school pupils.
- Provide another €20 million for the provision of free school books for all secondary school pupils.

117 Department of Education and Skills, *A Guide for Parents: Text Book Rental Scheme in Schools* (DES 2012) 8.

118 Joint Committee on Education and Social Protection, *Report on Tackling Back to School Costs* (2013) 20.

119 Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 17.

120 Department of Public Expenditure and Reform, *Project 2040 National Development Plan* (DPER 2018) 86.

121 Barnardos, *School Costs Survey 2018 Briefing Paper* (2018) 16.

7. Health

Health is a key component in the fight against poverty. Ensuring that children can access the supports and services they need in order to have good health both mitigates the damaging impact of poverty on children, and helps to overcome the accumulated disadvantage over the lifecycle that poverty creates.

Article 24 of the UNCRC makes clear the right of every child to enjoy ‘the highest attainable standard of health’, and that no child is deprived of access to health services. Access to basic health coverage is considered a core right of European citizenship, and as noted by the European Commission with a few exceptions, health care coverage is universal and mandatory for everybody with a residency status in a European Member State, and basic health coverage is ensured under public programme irrespective of ability to pay’.¹²²

7.1 Universal right to health care through primary care and access to health services

The *EU Recommendation on Investing in Children* recommends improving the responsiveness of the health system to better address the needs of disadvantaged children by dismantling the ‘the obstacles to accessing healthcare faced by children and families in vulnerable situations, including costs’ and by investing in prevention.¹²³

7.1.1 Primary Care and Access to Health Services

Entitlement to free GP care for every child under the age of six came into place in August 2015; by November 2017, 95 per cent of GPs had entered an agreement with the Health Service Executive (HSE) to provide the service,¹²⁴ and 362,380 children under the age of six (approximately 92 per cent of the eligible population) were registered for the service.¹²⁵ This means these children can access GP care without fees through entitlement to either a medical card or a GP visit card. *A Programme for a Partnership Government* commits to rolling out free GP care to all children under the age of 18 on a phased basis.¹²⁶

Budget 2016 announced the extension of free GP care to all children under the age of 12.¹²⁷ However, the roll-out of this measure has been delayed and continues to form part of the ongoing negotiations of a new GP contract.¹²⁸ While official policy documents state that the introduction of the scheme is a priority for the Government¹²⁹ and the HSE,¹³⁰ the roll out of universal free GP care has been downgraded to a long-term objective.¹³¹

The 2017 report of the all-party Committee on the Future of Healthcare, *Sláintecare*, recommended the delivery of expanded primary care services by the introduction of universal free GP over a five year period at a cost of €91 million.¹³² However, in the recently launched *Sláintecare Implementation Strategy* no clear timeframe for the delivery of universal free GP has been established. Instead the strategy commits to reviewing the eligibility framework for all services to inform the pathway to achieving universal healthcare, developing a policy proposal and roadmap for achieving universal

¹²² Directorate-General for Employment, Social Affairs and Equal Opportunities, *Quality in and Equality of Access to Healthcare Services: Executive Summary*, (European Commission 2008) 4.

¹²³ European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

¹²⁴ Minister for Health, Simon Harris TD, Written Answers, General Practitioner Services, 2 May 2017 [19151/17].

¹²⁵ Communication received by the Children’s Rights Alliance from the Department of Health, 6 December 2017.

¹²⁶ Department of the Taoiseach, *A Programme for a Partnership Government 2016* (Department of the Taoiseach, 2016) 55.

¹²⁷ Minister for Public Expenditure and Reform, Brendan Howlin TD, Address to Dáil Éireann on Expenditure Estimates 2016, 13 October 2015.

¹²⁸ Minister for Health, Simon Harris TD, Written Answers, General Practitioner Services, 12 July 2016 [20909/16].

¹²⁹ Department of Health, *Statement of Strategy 2016–2019* (HSE 2016) 13–14.

¹³⁰ Health Service Executive, *National Service Plan 2017* (HSE 2016) 22.

¹³¹ Martin Wall & Fiach Kelly, ‘Universal Free GP Care to be Significantly Delayed’ *The Irish Times* (Dublin, 23 July 2018).

¹³² Joint Oireachtas Committee on the Future of Healthcare, *Sláintecare, Report of the Oireachtas Committee on the Future of Healthcare* (Houses of the Oireachtas 2017) 65.

eligibility and introducing legislation to ensure that eligibility to health and social services is placed upon a statutory footing.¹³³

Realising free GP care is an important step forward to ensuring access to healthcare for all children, but most particularly for children growing up in poverty. With the annual average cost of medical and dental expenditure for households amounting to €1,051,¹³⁴ for families on a tight budget the cost of a GP visit can be a significant deterrent, and can mean that there is a delay in bringing children to the doctor. Ensuring that all children have access to primary care without the need to pay GP fees will help to secure access to health care in Ireland for children in low income families, and therefore help to mitigate the impact that poverty has on a child's development.

Given that access to free GP cards has been classed as a long-term objective by the Government, it may be worth considering how more children could access a medical card in the more immediate future. In Ireland, a medical card provides eligible households with free access to primary care including GP, oral, opticians and aural services, medicines and prescriptions, in-patient and out-patient services, medical appliances and maternity care.¹³⁵ Prescription medication is also provided free of charge excluding a €2 prescription charge, capped at €20 per person/family per month.¹³⁶ The medical card also entitles children to other secondary benefits such as free transport to school (for children who are three or more miles from school), exemption from secondary school exam fees and entitled to school books schemes in some cases.¹³⁷ Improving access to the medical card can therefore improve children's access to a range of additional benefits, not just health related services.¹³⁸

Medical cards are a means-tested benefit but each application for the medical card is assessed in its own right. People who are just above the income threshold but suffer from a health condition can be deemed eligible for 'discretionary cards.'¹³⁹ Since June 2017, all children in receipt of the Domiciliary Care Allowance are eligible for a medical card without a means test.

In most cases if a family's income is derived solely from social welfare they qualify for the medical card, as they have already satisfied a means test. Families in receipt of Working Family Payment typically do not meet this criteria and although allowances can be made for working families when applying for the medical card in relation to travel, housing and childcare costs, the assessment is complex and may contribute to the lack of take-up by those who are working but still living in poverty.¹⁴⁰

The income thresholds for the medical card have not been revised since 2005. Currently, the medical card income threshold for a family of two adults with two children under 16 is €342.50 a week.¹⁴¹ In 2014, the poverty threshold for this family type was €485.79¹⁴² and analysis of the EU Survey of Income and Living Condition estimates that approximately 15 per cent of children living below the poverty did not have a medical card or a GP card.¹⁴³ Although it is not possible to determine from this data whether this is due to non-take up or ineligibility,¹⁴⁴ the level at which the

133 Department of Health, *Sláintecare Implementation Strategy* (Government of Ireland 2018) 50.

134 Laya Healthcare, '€105,321 – The cost of raising a child from cradle to college' (Laya Healthcare, June 2015) <<https://bit.ly/2ILDqut>> accessed 5 July 2018.

135 Citizens Information, 'Medical Cards' (Citizens Information, 14 May 2018) <<https://bit.ly/2gZ6OPi>> accessed 5 July 2018.

136 Citizens Information, 'Medical Cards' (Citizens Information, 14 May 2018) <<https://bit.ly/2gZ6OPi>> accessed 5 July 2018.

137 Citizens Information, 'Medical Cards' (Citizens Information, 14 May 2018) <<https://bit.ly/2gZ6OPi>> accessed 5 July 2018.

138 Citizens Information, 'Medical Cards' (Citizens Information, 14 May 2018) <<https://bit.ly/2gZ6OPi>> accessed 5 July 2018.

139 Minister of State with special responsibility for Disabilities, Finian McGrath T.D., Commencement Matters: Medical Card Eligibility, Seanad Debates, 17 April 2018.

140 Patricia Keilthy, Medical Card Eligibility: Profiling People Living in Poverty without a Medical Card using EU-SILC 2006, (Combat Poverty Agency 2009).

141 Citizens Information, 'Medical Cards' (Citizens Information, 14 May 2018)

<http://www.citizensinformation.ie/en/health/medical_cards_and_gp_visit_cards/medical_card.html> Accessed 5 July 2015

142 Data supplied by the Department of Social Protection (unpublished communication 2015).

143 Calculations based on analysis of the 2015 Anonymised Microdata File of the Survey of Income and Living Conditions.

144 T. Callan *et al*, 'Income-Tested Health Entitlements: Microsimulation Modelling Using SILC' (2017) Journal of the Statistical and Social Inquiry Society of Ireland XLVI.

current thresholds are set technically means that families can be on a very low income and not be entitled to a medical card.

All means-tested benefits, including the medical card, are equivalised based on the type of household, i.e. the number of people in the household and the proportion of householders who are financially dependent. Significantly, different systems of equivalisation are used in assessing different means-tested benefits. The income thresholds for the medical card in relation to dependent adult and child are lower than most other social welfare benefits and are well below the recommended target for children of 33-35 per cent of an adult payment contained in the *National Action Plan for Social Inclusion 2015-2017*.¹⁴⁵ For example, the additional allowance of €38 for children under 16 represents just 21 per cent of the adult allowance of €184. If the medical card thresholds were equivalised to the same standards as other social welfare payments, income thresholds would be more generous and would make more children eligible for the medical card. At the current rate the medical card income thresholds can be considered to excessively penalise families with children.

Recommendations

- Increase Medical Card income thresholds, for the first time since 2005, to the equivalent of the highest means-tested welfare payment (currently €243.30 per week for the state pension). Increase the allowance for children under 16 to €80 in line with other social welfare payments. Automatically link Working Family Payment eligibility to Medical Card eligibility to increase the take-up by low income working families.

7.2 Universal right to health care including through prevention and health promotion

7.2.1 Food Poverty

The *EU Recommendation on Investing in Children* recommends that states ‘invest in prevention particularly during early childhood years, by putting in place comprehensive policies that combine nutrition, health, education and social measures’.¹⁴⁶

Clear health inequalities exist between children who live in disadvantaged areas and the general population.¹⁴⁷ Food poverty is one of the driving forces behind higher rates of obesity and ill-health in disadvantaged communities.¹⁴⁸ Food poverty is defined as:

[...] the inability to have an adequate and nutritious diet due to issues of affordability or accessibility. Food poverty is a complex issue with many health and social dimensions. Households experiencing food poverty consume less nutritionally balanced diets and suffer from higher rates of diet related chronic diseases.¹⁴⁹

Research on the links between dietary energy density and dietary energy cost has found that refined foods, added sugars and added fats are some of the cheapest sources of dietary energy as opposed to more costly nutrient dense foods such as lean meat, fruit and vegetables.¹⁵⁰ The high cost of good quality, nutritious food often prices low income families out of maintaining healthy diets by limiting their choices to more processed and refined food based diets as a cost effective way of meeting daily calorific requirements.¹⁵¹ While the

¹⁴⁵ Department of Social Protection, *Updated National Action Plan for Social Inclusion* (DSP 2016) 8.

¹⁴⁶ European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

¹⁴⁷ Department of Health, *A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016–2025* (Stationery Office 2016) 50.

¹⁴⁸ Irish Heart Foundation, *Investing in children’s future health Pre-Budget Submission* (IHF July 2015) 3.

¹⁴⁹ Safe Food, *Measuring Food Poverty in Ireland – the indicator and its implications*, (Safe Food 2012) 2.

¹⁵⁰ David Madden, ‘The Poverty Effects of a ‘Fat-Tax’ in Ireland’ (2015) 24 *Health Economics*, 3.

¹⁵¹ David Madden, ‘The Poverty Effects of a ‘Fat-Tax’ in Ireland’ (2015) 24 *Health Economics*, 4.

short-term impact of food poverty is poor diet and lack of nutrients, the long term effects of food poverty can lead to diet related illnesses, including obesity.¹⁵²

In 2016, 9.9 per cent of the population experienced food poverty.¹⁵³ Research has found that rates of social welfare payments and earnings based on the minimum wage in Ireland make it difficult to follow a healthy diet.¹⁵⁴ The risk of low-income families experiencing food poverty is often related to the age of their children, with expenditure greatest for infants who have specific dietary requirements and teenagers who consume more food.¹⁵⁵ Two of the 11 deprivation indicators relate to food: being able to have a meal with meat, chicken, fish or vegetarian equivalent every second day and having a roast once a week.¹⁵⁶ Food poverty contributes to malnutrition, obesity, and poor concentration in school.¹⁵⁷ To address the complex issue of food poverty, a multi-faceted approach is required across four key areas:¹⁵⁸ affordability,¹⁵⁹ accessibility,¹⁶⁰ availability¹⁶¹ and awareness.¹⁶² Currently there is no centralisation of policy measures relating to food poverty across Government departments.

The School Meals Programme, funded by the Department of Employment Affairs and Social Protection, is a positive way of ensuring regular access to healthy meals for disadvantaged children, however, it is not a universal programme. While the scheme was extended to non-DEIS schools in 2017,¹⁶³ schools must apply for the programme, with priority often given to DEIS schools.¹⁶⁴ In 2017, expenditure on the School Meals Programme amounted to €47.5 million with up to 250,000 children benefitting from the service.¹⁶⁵ The funding for the School Meals Programme was increased in Budget 2018 to €54 million, with €1.7 million allocated for 80 newly-designated DEIS schools.¹⁶⁶ From September 2018, an additional 18,400 children will benefit from the Programme.¹⁶⁷ As the School Meals Programme only runs through school term-time, children are at risk of hunger during school holidays so alternative ways to ensure children do not go hungry during school holidays should be considered including extending the programme to youth work settings. Currently there are no mechanisms to support non-formal education and early-years settings to address the issue of food poverty despite both settings acting as vital services for children living in poverty.

152 Irish Heart Foundation & Social Justice Ireland, *Reducing Obesity and Future Health Costs: A Proposal for Health Related Taxes* (IHF 2015) 7.

153 Department of Employment Affairs and Social Protection, *Social Inclusion Monitor 2016* (Department of Employment Affairs and Social Protection 2018) 50.

154 Bernadette MacMahon and Noreen Moloney, *What is the cost of a healthy food basket in the Republic of Ireland in 2016?* (SafeFood 2016).

155 Bernadette MacMahon, Gráinne Weld, Robert Thornton and Micheál Collins, *The Cost of a Child: A consensual budget standards study examining the direct cost of a child across childhood* (Vincetian Partnership for Social Justice 2012) 32.

156 Central Statistics Office, 'Survey on Income and Living Conditions', <<https://bit.ly/2L4lzf7>> accessed 10 July 2018.

157 Healthy Food for All, *Pre-Budget Submission 2014* (Healthy Food for All 2013).

158 Healthy Food for All Initiative, 'Food Poverty' <<http://healthyfoodforall.com/food-poverty/>> accessed 5 July 2018.

159 MacMahon, and Weld, *The cost of a minimum essential food basket in the Republic of Ireland: Study for six household types* (SafeFood 2016).

160 This is a critical and challenging issue: low-income families may have limited scope to choose healthier food options, not just because of financial constraints, but because they may live in areas which lack local shops and supermarkets and/or have limited transport options which gives rise to difficulties in accessing shops and bringing food home.

161 For families living on low incomes in disadvantaged areas, fresh and healthy food options may be limited or unavailable. In these areas, families may not have access to a large supermarket and are reliant on local convenience stores. Fresh foods have shorter shelf lives, with higher storage costs and lower profit margins. Therefore, smaller local shops may not stock a full range of fresh produce.

162 It is essential that accurate and accessible information is made widely available by agencies responsible for advancing public health – given especially that food advertising may be strongly promoting less healthy food choices and that media stories about food and nutrition are sometimes misleading and/or contradictory. Families on low incomes, who may have difficulties in being able to purchase healthy food for reasons of cost and physical access, and who in addition may suffer from educational disadvantage, need to be given specific consideration in the development and implantation of programmes of information and advice on health eating.

163 Department of Education and Skills, 'Ministers Varadkar & Bruton announce €3m expansion of school meals programme' (*Department of Education & Skills*, 27 March 2017) <<https://bit.ly/2Bhp4Nw>> accessed 5 July 2018.

164 Communication received by the Children's Rights Alliance from the Department of Employment Affairs and Social Protection, 2 December 2015.

165 Communication received by the Children's Rights Alliance from the Department of Employment Affairs and Social Protection, 2 December 2015.

166 Government of Ireland, Budget 2018, *Expenditure Report, Part II: Expenditure Allocations 2018–20* (Stationery Office 2017) 82.

167 Department of Employment Affairs and Social Protection, Budget 2018 (Welfare.ie 2017) <<http://bit.ly/2EhGXts>> accessed 4 January 2018.

Unlike other European countries, Ireland has a poor infrastructure of kitchen facilities in schools.¹⁶⁸ The current programme does not cover the cost of kitchen equipment, facilities or staff costs, which means that schools have to meet these costs from their core budget or charge students.

It is welcome that *Project Ireland 2040: National Development Plan* commits to spending €8.4 billion on primary and post-primary school building from 2018 to 2027.¹⁶⁹ Over the next ten years, €2.5 billion will be spent on the refurbishment of Ireland's existing school stock which will include the building of physical education facilities and school laboratories.¹⁷⁰ In order to address food poverty experienced by children and young people, the school building programme and refurbishments grants should also ensure that funding provided is utilised for the construction of kitchen facilities.

Recommendations

- The issue of food poverty falls within the remit of several key government departments including the Department of Health, the Department of Education and Skills, the Department of Employment Affairs and Social Inclusion, the Department of Children and Youth Affairs and the Department of Housing, Planning and Local Government. Currently there is a lack of coordination and leadership on the issue. Given the shared responsibility, a single government department should hold primary responsibility for the coordination and centralisation of food poverty policy measures in Ireland.
- Ensure that funding allocated in the *National Development Plan 2018-2027* to build schools is contingent on including a school kitchen to provide hot nutritious meals to children. As infants and teenagers are the most costly to feed, establish pilot projects to extend the School Meals Programme to early years settings and youth services as another avenue to address food poverty for children outside of the school setting.

¹⁶⁸ Educational Disadvantage Centre, 'National Strategy Hunger Prevention in Schools' (Educational disadvantage Centre: DCU) <<https://www4.dcu.ie/edc/hunger-prevention-schools.shtml> > accessed 30 January 2017.

¹⁶⁹ Department of Public Expenditure and Reform, *Project 2040 National Development Plan* (DPER 2018) 86.

¹⁷⁰ Department of Public Expenditure and Reform, *Project 2040 National Development Plan* (DPER 2018) 86.

8. Housing

The housing situation in Ireland has reached crisis point. Child homelessness has increased by more than 100 per cent in the past two years and in July 2018 the crisis peaked with a total of 1,778 families with 3,867 children homeless nationwide.¹⁷¹ Of these families, almost two thirds were one parent families.¹⁷² Excluded from these figures are children and families living in domestic violence¹⁷³ accommodation and the 585 Traveller families living in unauthorized halting sites without access to basic facilities.¹⁷⁴ In 2017, there were over 85,000 households on the social housing waiting list including 47,139 households with children.¹⁷⁵ Lone parent families, particularly lone mothers, people with disabilities and people with lower socio-economic backgrounds face high levels of discrimination in accessing housing.¹⁷⁶

8.1 Affordable, quality housing including social housing

The *EU Recommendation on Investing in Children* recommends that the State ‘make it possible for families with children to live in affordable, quality housing (including social housing), address situations of exposure to environmental hazards, overcrowding and energy poverty’.¹⁷⁷

Rebuilding Ireland has a target of 50,000 social housing units to be delivered by 2021, supported by an investment of €6 billion.¹⁷⁸ However, progress to date has been very slow as there is a continued reliance on the private rented sector to meet social housing need through Housing Assistance Payment (HAP), Rental Accommodation Scheme (RAS) and Long Term Leasing. In 2017, 76 per cent of social housing need was met through the private rented sector.¹⁷⁹ Concerns have also been raised about the lack of suitable social housing for persons with a disability, including children, and the increase in the number of people with a disability on the social housing waiting list.¹⁸⁰

Recommendation

- Pursue a housing-first approach by increasing the output of built and acquired Local Authority and Approved Housing Bodies social housing units in 2019 to 9,500 as part of the *Rebuilding Ireland* commitment to invest €6 billion by 2021.

8.2 Support Families and Children at risk of homelessness

The *EU Recommendation on Investing in Children* recommends that the State ‘Support families and children at risk of homelessness by avoiding evictions, unnecessary moves, separation from families as well as providing temporary shelter and long-term housing solutions’.¹⁸¹

8.2.1 Tenancy protection and homeless prevention measures

A key contributing factor to the housing and homelessness crisis is rising rents. In 2017 alone, rents increased nationwide by 10.4 per cent.¹⁸² Yet, Rent Supplement and HAP limits have not been increased since July 2016. In addition, the shortage of private rented accommodation is placing even

171 Department of Housing, Planning, Community & Local Government, ‘Homelessness Report July 2018’ available online at: <https://www.housing.gov.ie/sites/default/files/publications/files/homeless_report_-_july_2018.pdf> accessed 30 August 2018.

172 Department of Housing, Planning, Community & Local Government, ‘Homelessness Report July 2018’ available online at: <https://www.housing.gov.ie/sites/default/files/publications/files/homeless_report_-_july_2018.pdf> accessed 30 August 2018.

173 In 2016, there were 2,206 children admitted to domestic violence refuges. Safe Ireland, ‘Domestic Violence Services National Statistics 2016’ available online at: <<https://www.safeireland.ie/policy-publications/>> accessed 30 August 2018.

174 Department of Housing, Planning, Community & Local Government ‘Annual Estimate of Accommodation of Traveller Families, 2017: Traveller Families in LA and LA Assisted Accommodation and on Unauthorised Halting Sites’ available online at: <<https://bit.ly/2N7HuWW>> accessed 30 August 2018.

175 Housing Agency, *Summary of Social Housing Assessments* (Housing Agency 2017) 14.

176 Irish Human Rights and Equality Commission, *Discrimination and Inequality in Housing in Ireland* (IHREC 2018) IX – XI.

177 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

178 *Rebuilding Ireland, Action Plan for Housing and Homelessness* (DHPLG 2016) 106.

179 Department of Housing, Planning, Community & Local Government, ‘Overall Social Housing Provision’ (DHPLG 2017) <<https://bit.ly/2MZ2mME>> accessed 5 July 2018.

180 Disability Federation of Ireland, ‘Housing and Disability: The Facts’ (DFI 2017) <<https://bit.ly/2L3Ec2V>> accessed 5 July 2018.

181 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

182 Daft.ie, ‘Irish Rental Price Report Q4 2017’ (Daft.ie 2018) <<https://bit.ly/2N1wcA1>> accessed 5 July 2018.

more pressure on the system. In March 2018, only seven per cent of available rental properties were within HAP and rent supplement limits.¹⁸³

In recent years the mortgage arrears crisis has resulted in many families losing their home or having to move house due to loss of employment or unsustainable mortgages. The number of buy-to-let accounts in arrears is of concern, with 13,099 or 11 per cent of the total stock of buy-to-let mortgage accounts in arrears for over 720 days at the end of 2017.¹⁸⁴ The phenomenon of companies purchasing properties in mortgage arrears remains unregulated and adds to concerns about security of tenure for those in the private rented sector.

Recommendations

- In conjunction with rent certainty measures, increase the Housing Assistance Payment and Rent Supplement limits in line with market rents to prevent more families becoming homeless.
- Bring forward legislation to ensure security for families with children in rented properties in case of repossessions of buy-to-let properties.
- Ring fence Section 10 funding from the Central Government to Local Authorities under the Housing Act 1988 to homeless services for targeted homeless prevention measures.

8.3 Emergency Accommodation

Long-term living in emergency accommodation is costly, unsustainable and not conducive to childhood development and well-being. In particular, living in emergency accommodation can impact on the basic needs of children which when not fulfilled can negatively impact on their educational experience.¹⁸⁵ Despite a commitment to end the practice of housing families in hotels and B&B by July 2017, in December 2017 approximately 60 per cent of homeless families continue to live in this inappropriate and unsuitable emergency accommodation almost 500 were living in “family hubs”.¹⁸⁶ While the latter is more suitable than hotels or B&B as families have access to greater facilities including cooking facilities, this type of accommodation must be considered temporary to ensure that it does not ‘normalise family homelessness’ as highlighted by the Irish Human Rights and Equality Commission.¹⁸⁷ The primary policy response must be to ensure that every family has access to suitable permanent accommodation. In the interim the highest levels of child protection in emergency accommodation should be guaranteed.

Recommendation

- End the practice of ‘self-accommodation’ for families with children with immediate effect. Ensure that families with children who become homeless are provided with the necessary supports to access appropriate accommodation. End long-term use of emergency accommodation for children and families by introducing a six month time limit and implement *Housing First* commitments as a matter of urgency.

8.4 Energy Poverty and Substandard Accommodation

In 2016, 48 per cent of people living in consistent poverty went without heating at some stage in the previous year due to cost and 29 per cent could not afford to keep their house adequately warm.¹⁸⁸ The private rented sector has higher proportions of E, F and G Building Energy Ratings (BERs) than either local authority or owner occupied homes.¹⁸⁹ Census 2016 shows that the number of children

183 Simon Community, *Locked out of the market: snapshot survey* (Simon Community 2018) 27.

184 Central Bank of Ireland, ‘Residential Mortgage Arrears and Repossessions Statistics: December 2017’ <<https://bit.ly/2KJ60NY>> accessed 5 July 2018.

185 Dr Geraldine Scanlon and Grainne McKenna, *Home Works: A Study on the Educational Needs of Children Experiencing Homelessness and Living in Emergency Accommodation*, (Children’s Rights Alliance 2018).

186 Dublin City Council, *Homelessness Update: Emergency Accommodation Usage Families Experiencing Homelessness* (DCC 2018).

187 Irish Human Rights and Equality Commission, ‘Challenges the Normalisation of Family Homelessness’ (IHREC 12 July 2017) <<https://www.ihrec.ie/human-rights-equality-commission-challenges-normalisation-family-homelessness>> accessed 5 July 2018.

188 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2016* (CSO 2017). Table 7c.

189 Vincentian Partnership for Social Justice, *Minimum Household Energy Need* (VPSJ 2014).

living in rented accommodation has increased significantly since 2006.¹⁹⁰ The *Strategy to Combat Energy Poverty* recognises the need to address energy poverty in homes where children live, in particular those headed by one parent.¹⁹¹ However, most of the schemes are only currently available to homeowners.¹⁹² The EU SILC basic deprivation indicators include two specific indicators which relate to energy poverty: having to go without heating during the last year through lack of money and whether it is possible to keep the home adequately warm.¹⁹³ International research has documented that energy poverty negatively impacts on a child's physical health, mental health and educational attainment¹⁹⁴ and can result in under-nutrition, obesity, poorer development outcomes for children under three and increased antisocial behaviour.¹⁹⁵

Local authorities have a responsibility to ensure that basic standards in private rented accommodation are adhered to, including the issue of overcrowding.¹⁹⁶ In 2016, 75 per cent of inspected properties failed to meet minimum legal standards, yet legal action was only initiated in 2,500 cases.¹⁹⁷

Recommendations

- To address the basic deprivation indicators related to energy poverty, implement the commitments contained in *A Strategy to Combat Energy Poverty* relating to households with children.
- Expand the eligibility criteria of the existing energy efficiency schemes to people who suffer basic deprivation and who are not covered by existing schemes, including those living in the private rented sector.
- Ensure local authorities have appropriate resources to carry out inspections and to pursue enforcement proceedings.

8.5 Domestic Violence

Safe Ireland found that 4,831 requests for domestic violence accommodation – one quarter of those who sought help – could not be met in 2014 because refuges were full.¹⁹⁸ This highlights the 'integral connection between domestic violence and homelessness'.¹⁹⁹ In 2016, 2,206 children were admitted to a domestic violence refuge.²⁰⁰ Undersupply and rising rents means that many women, including those with families, who are victims of domestic violence cannot find homes in which to move into and live safely.²⁰¹

Recommendation

- Increase funding for domestic violence refuges by 20 per cent in line with demand for places. Implement the *Rebuilding Ireland* commitment to provide additional emergency refuge spaces. Estimated cost: €4.5 million.

190 Central Statistics Office, *Census 2016 Profile 3 - Age Profile of Ireland* (CSO 2017).

191 Department of Communications, Climate Action, and Environment, *The Strategy to End Combat Poverty* (DCCAE 2016).

192 SEAI, 'Better Energy Warmer Home Scheme (SEAI 2017) <<https://bit.ly/2yLhUiv>> & SEAI, 'Warmth and Wellbeing Programme' (SEAI 2017) <<https://www.seai.ie/grants/home-grants/warmth-and-wellbeing/>> accessed 5 July 2018.

193 Central Statistics Office, 'Survey on Income and Living Conditions', <<https://bit.ly/2L4lf7>> accessed 10 July 2018.

194 Sophie Adam & Rachel Monaghan, *Fuel Poverty: What it means for young people* (National Children's Bureau 2015) 4-5, Kimberly O'Sullivan *et al* 'Child and Youth Fuel Poverty: Assessing the Known and Unknown' (2016) 10 People, Place and Policy 78.

195 Kimberly O'Sullivan *et al* 'Child and Youth Fuel Poverty: Assessing the Known and Unknown' (2016) 10 People, Place and Policy 78.

196 Citizens Information, 'Minimum standards for rented housing' (Citizens Information 2017) <<https://bit.ly/2NE0wBSI>> last accessed 5 July 2018.

197 National Oversight and Audit Commission, *Performance Indicators in Local Authorities* (NOAC 2016).

198 Safe Ireland, *National Domestic Violence Service Statistics Report 2014* (Safe Ireland 2015) 4.

199 Safe Ireland, 'New Domestic Violence Statistics Show 14 Requests for Accommodation Could Not Be Met Every Day' <<http://www.safeireland.ie/2016/new-domestic-violence-statistics-show-14-requests-for-accommodation-could-not-be-met-every-day/>> accessed 4 July 2016.

200 Safe Ireland, 'Domestic Violence Services National Statistics 2016' available online at: <<https://www.safeireland.ie/policy/publications/>> accessed 30 August 2018.

201 Safe Ireland 'New Domestic Violence Statistics show 14 Requests for Accommodation Could Not Be Met Every Day' (16 February 2016) available online at: <<https://bit.ly/2iaM8EM>>.

9. Prevention and Early Intervention

The *EU Recommendation on Investing in Children* notes that ‘early intervention and prevention are essential for developing more effective and efficient policies, as public expenditure addressing the consequences of child poverty and social exclusion tends to be greater than that needed for intervening at an early age.’²⁰² *Better Outcomes, Brighter Futures: The National Policy Framework for Children and Young People*²⁰³ aims to rebalance resources to place a greater emphasis on prevention and earlier intervention, the aim of which is to gradually transfer resources over time from crisis to earlier points of intervention.²⁰⁴

Some children may experience poverty-related adversity which impacts their health, development and wellbeing, resulting in negative consequences later in life.²⁰⁵ It can be particularly damaging for children as it can directly affect their physical and brain development and create stressful family relationships that impact on the child-parent relationship.²⁰⁶

Poverty and debt is one of eight types of harmful childhood adversities.²⁰⁷ Children experiencing poverty can experience multiple-related adversities, such as child abuse and neglect, parental illness and disability, parental substances misuse, parental mental health issues, family separation and bereavement,²⁰⁸ which increase the likelihood of poorer outcomes for these children.²⁰⁹ It is possible to intervene and improve the life chances of children experiencing poverty-related adversity by providing early childhood interventions to children and to their parents.²¹⁰

Additionally, the length of time children experience poverty impacts on their outcomes. There is distinction between experiencing persistent²¹¹ and transient poverty. Some children have a short-term poverty experience, and they move out of poverty as their parents’ circumstances change. When poverty persists for a considerable period in childhood, there are more likely to be negative impacts on the child’s development and well-being.²¹² One parent families and families with those of working age with a disability experience the highest levels of persistent poverty in Ireland,²¹³ suggesting that children within these families are at higher risk of experiencing the negative consequences of poverty-related adversity. This suggests that preventing children falling into poverty through the provision of adequate incomes and services and quality employment opportunities, or moving them out quickly when they do is extremely important. From this perspective, this submission has focused on preventative approaches and recommendations.

202 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

203 *Better Outcomes, Brighter Futures* defines ‘prevention and early intervention’ for children as: intervening at a young age, or early in the onset of difficulties, or at points of known increased vulnerability, such as school transitions, adolescence and parenthood.

204 In this regard, the child poverty subgroup agrees with the approach, but notes that there will always be a need for adequately resourced services and support to treat children and families and to respond to crises in families.

205 Defined as a lack of positive circumstances or opportunities. Mark Morgan, S Rochford and Aishling Sheehan, *Adversity in Childhood – Outcomes, Risk and Resilience*. Centre for Effective Services (2016)

206 Harvard Centre for the Developing Child, ‘In Brief: The Impact of Early Adversity on Children’s Development’ (Center on the Developing Child Harvard University 2017) <<https://bit.ly/2GismjO>> accessed 5 July 2018.

207 Mark Morgan, S Rochford and Aishling Sheehan, *Adversity in Childhood – Outcomes, Risk and Resilience*. Centre for Effective Services (2016). Other childhood adversities include child abuse and neglect, parental illness and disability, parental substance misuse, parental mental health issues, family separation or bereavement.

208 Mark Morgan, S Rochford and Aishling Sheehan, *Adversity in Childhood – Outcomes, Risk and Resilience*. Centre for Effective Services (2016). Other childhood adversities include child abuse and neglect, parental illness and disability, parental substance misuse, parental mental health issues, family separation or bereavement.

209 Department of Children and Youth Affairs, *Better Outcomes, Brighter Futures: The National Policy Framework for Children and Young People 2014-2020* (Department of Children and Youth Affairs 2014) 8.

210 Katherine A. Beckmann, ‘Mitigating Adverse Childhood Experiences Through Investments in Early Childhood Programs’, September–October, 2017, Volume 17, Issue 7, Supplement, S28–S29.

211 Persistent material deprivation and income poverty are understood here as being in a household that is deprived or poor in two consecutive years. Dorothy Watson *et al*, *Poverty Dynamics of Social Risk Groups in the EU: An Analysis of the EU Statistics on Income and Living Conditions, 2005 to 2014* (ESRI 2018).

212 Mark Morgan, S Rochford, and Aishling Sheehan, *Adversity in Childhood – Outcomes, Risk and Resilience*. (Centre for Effective Services 2016).

213 Dorothy Watson *et al*, *Poverty Dynamics of Social Risk Groups in the EU: An Analysis of the EU Statistics on Income and Living Conditions, 2005 to 2014* (ESRI 2018) xiv.

The Department of Children and Youth Affairs is making progress with two important pillars of work that can be harnessed to support the Government's *Better Outcomes: Brighter Future* objectives: the Affordable Childcare Scheme and the learning from the Area Based Childhood Programme and its alignment with the Prevention, Partnership and Family Support Programme (PPFS) by Tusla, the Child and Family Agency.²¹⁴

6.1 ABC Programme and Tusla's work programme

The Department of Children and Youth Affairs is commencing mainstreaming the learning from the implementation of the Area Based Childhood (ABC) Programme into statutory and voluntary agencies.²¹⁵ The mainstreaming of learning provides the Government with a key opportunity to reduce some of the effects of poverty for children living in consistent poverty.

It will be a challenge for Government to replicate this model throughout the country. In developing the Programme, it will be critical to identify what learning can be translated to national initiatives and universal services. It will also be important to remember that an over-reliance on one type of model could result in certain groups of children being overlooked. Additionally, future programme developments need to consider the fact that children living in consistent poverty are more likely to live in rural locations and on the Border, Midlands and Western regions.²¹⁶ The ABC Programme sites to date have all been located in urban centres and have needed significant investment.

The Subgroup understands that the ABC Programme is to be integrated into Tusla, the Child and Family Agency. Tusla's work includes the Prevention, Partnership and Family Support (PPFS) Programme, a three-year programme of early intervention and preventative work to embed prevention and early intervention in the work of Tusla.²¹⁷ The proposed action plan,²¹⁸ to strengthen alignment between the ABC Programmes and Tusla's PPFS Programme of work, should include clear actions and timelines for mainstreaming prevention and early intervention within Tusla's work.

Recommendation

- Continue to fund the ABC Programme at current levels.

²¹⁴The Child and Family Agency, *Tusla Corporate Plan 2018-2020*, (Tusla 2018) 26.

²¹⁵ Children's Rights Alliance, *Report Card 2018* (Children's Rights Alliance 2018) 46. The evaluations of the Programme and constituent initiatives are due to be published in June 2018.

²¹⁶Children's Rights Alliance, *Report Card 2018* (Children's Rights Alliance 2018) 46

²¹⁷Tusla, Child and Family Agency, 'Prevention, Partnership and Family Support Programme' (Tusla 2018) <https://bit.ly/2IV8ASh> accessed 5 July 2018.

²¹⁸The Child and Family Agency, *Tusla Corporate Plan 2018-2020*, (Tusla 2018) 26.

10. Youth Work Services

The *EU Recommendation on Investing in Children* recommends that the State provide opportunities to participate in informal learning activities that take place outside the home and after regular school hours.²¹⁹

As outlined in the Youth Work Act 2001:

Youth Work is a planned programme of education designed for the purpose of aiding and enhancing the personal and social development of young person through their voluntary participation, which is complementary to their formal, academic or vocational education and training and is provided primarily by voluntary youth organisations.²²⁰

Youth Work is delivered by youth organisations which are active in almost every community reaching over 380,000 young people.²²¹ As detailed in the Indecon report, youth services are particularly active in supporting young people from economically or socially disadvantaged communities, with 53 per cent of all participants coming from these areas.²²² Youth organisations work in a range of areas such as promoting active citizenship and supporting the participation of young people in education and training. They also deliver programmes to promote positive mental health, school completion and to prevent anti-social behaviour and prevent substance misuse. The track record, credibility and reach of the youth sector is also demonstrated by the fact that we have the highest level of involvement in youth services in the EU, with 26 per cent of young people active in a youth club.²²³

The commitment in *Programme for a Partnership Government* to ‘fund an expansion of Youth Services that support, in particular, Early School Leavers into employment and in recognising the value of such services and groups’ is welcome. Between 2015 and 2020, the number of young people will grow by an estimated 13 per cent. This will also create challenges but with adequate resources the Youth Work sector is well placed to support young people to reach their potential and make Ireland the best country in the world in which to be a young person.

Investment in youth work can contribute to reducing poverty among young people under 18 years and benefit both their families and communities. In addition for every €1 invested in youth work the economic benefit/costs saved by the State in the long run are €2.20.²²⁴ This study demonstrates that investment in youth work not only supports young people to reach their full potential and become active citizens, it also reduces long-term costs for the State in relation to the health, justice and welfare services for young people. The funding provided also provides support to the 40,000 volunteers who work with young people.

The current expenditure for youth work services from the Department of Children and Youth Affairs fell by over 31 per cent between 2008 and 2015. Between 2008 and 2014, the annual amount spent on youth work for each young person fell from €76 to €58. The additional €1.5 million increase in funding to youth services announced in Budget 2018 and the additional €2 million capital grant scheme announced by the Minister for Children in Youth Affairs in April 2018 are warmly welcome.²²⁵ This brings the total to €61.5 million in current and capital funding in supports for youth

219 European Commission, *Commission Recommendation of 20.2.2013: Investing in children: breaking the cycle of disadvantage* (Brussels, 20.2.2013 C(2013) 778 final) <http://ec.europa.eu/social/main.jsp?catId=1060&langId=en>.

220 Youth Work Act 2001, s.3.

221 Department of Children and Youth Affairs, ‘Funding Programmes, Initiatives and Location of Projects’ <http://www.dcy.gov.ie/viewdoc.asp?fn=/documents/youthaffairs/funding.htm>

222 Assessment of the Economic Value of Youth Work by Indecon Economic Consultants, November 2012.

223 European Commission, *Youth on the Move: Analytical Report of Flash Eurobarometer Number 319a* (European Commission 2011).

224 Assessment of the Economic Value of Youth Work by Indecon Economic Consultants, November 2012.

225 Department of Children and Youth Affairs, ‘Minister Zappone announces €2m Youth Capital Funding Scheme 2018’ (DCYA 20 April 2018) <http://childrensdatabase.ie/viewdoc.asp?DocId=4659&CatID=11&mn=&StartDate=01+January+2018> accessed 11 July 2018.

services in 2018.²²⁶ However, if to achieve the commitment in the Programme for Government, the outcomes set out in the *National Youth Strategy* and to cater for the increased youth population, particularly the most disadvantaged it is vital that the Government continues to invest significantly in young people and youth work.

Recommendation

- Increase investment in Youth Work Services to €73 million by 2020 in line with the commitment in the Programme for Government, particularly measures to address disadvantage, early school leaving and employability, in light of the projected population growth of young people by 2020 and to support the implementation of the National Youth Strategy.

²²⁶Department of Children and Youth Affairs, 'Minister Zappone announces €2m Youth Capital Funding Scheme 2018' (DCYA 20 April 2018) <http://childrensdatabase.ie/viewdoc.asp?DocId=4659&CatID=11&mn=&StartDate=01+January+2018> accessed 11 July 2018.