

*The Irish social welfare system is not in crisis, but faces profound challenges that arise in the wider social, economic and demographic contexts. These challenges have been compounded by the coronavirus pandemic and its impact on the economy and society. (NESC Report 151)*

# INOUE Submission to the Commission on Tax and Welfare



January 2022

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## Introduction

Over the past two years in response to the impact of the COVID-19 health pandemic on Irish society and the labour market, the social welfare system has demonstrated a level of flexibility and support not seen beforehand. Yet, for many people living on a non-COVID-19 social welfare payment the recent budgetary improvements have not kept pace with the rising cost of living, with inflation. While at the same time, a lot of people struggled to manage when the community organisations they have relied on for support were unable to provide regular in-person supports, services and activities.

Prior to the current crisis, the changing world of work was throwing up questions about existing social welfare systems and their ability to support people in a-typical work situations if they lost their job or were struggling on inadequate incomes. It was also raising questions about how and where people could work. In response to the health restrictions and social distancing required to cope with COVID-19, more people were facilitated and indeed encouraged to work from home. While other types of work that did not lend themselves to this opportunity were put on hold. The difference in the fall in employment vis-à-vis the income tax take highlights that many of the jobs that were put on hold were in lower paid employment.

In response to these developments and to provide the members of the Irish National Organisation of the Unemployed (INOUE) an opportunity to discuss their implications, the organisation ran two on-line events on February 16<sup>th</sup> and 18<sup>th</sup>, 2021 entitled *Developing a Social Welfare System for the Future*. And this work will inform the INOUE's submission to the Commission on Tax and Welfare.

## Your Vision, Our Future

The Commission on Taxation and Welfare called its public consultation *Your Vision, Our Future*. The online questionnaire contained ten chapters covering: general questions; fiscal sustainability; promoting employment; climate; housing; supporting economic activity; tax expenditures; public health; and administration. While this submission will draw on the questions raised under these headings, it will also focus on the five themes explored in the INOUE's on-line events including: adequacy; delivery of social welfare services; genuinely seeking work criteria; social insurance; and the interaction between work and the social welfare system.

## Context / General Questions

A presentation entitled "*Building a Better Social Welfare System*" was made at the INOUE events, this presentation drew on the National Economic and Social Council (NESC) Report No.151<sup>1</sup> on "*The Future of the Irish Social Welfare System: Participation and Protection*". The commitments in the *Programme for Government* under *Mission: A New Social Contract* were also noted including:

- *Every citizen has a stake in a strong, responsive social protection system that assists in the costs of raising children, helps those in need or who have fallen onto hard times and provides for us in our old age.*

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<sup>1</sup> This report was published in November 2020 and is available at <https://www.nesc.ie/publications/the-future-of-the-irish-social-welfare-system-participation-and-protection/>

- *Protect core weekly social welfare rates.*
- *Recognise the importance of ancillary benefits and eligibility criteria to vulnerable groups.*
- *Consideration will be given to increasing all classes of PRSI over time to replenish the Social Insurance Fund to help pay for measures and changes to be agreed including, inter alia, to the state pension system, improvements to short-term sick pay benefits, parental leave benefits, pay-related jobseekers benefit and treatment benefits (medical, dental, optical, hearing).*
- *Progress to a living wage over the lifetime of the Government.*
- *Improve jobseeker supports for people aged under 24 over the lifetime of the Government.*
- *Increase the availability of activation schemes, including those run by local employment services.*

The NESC report notes three overriding issues are repeatedly identified in international and national studies as pertinent to the Irish welfare system including:

- economic inequality,
  - *A high incidence of low market incomes*
  - *Ireland relies heavily on the tax-benefit system to achieve distributional policy goals*
- the mix of cash versus benefits, and
  - ♦ *historically in Ireland, social welfare cash benefits - and their associated expenditures - tend to displace direct services in meeting social need*
- the role of social insurance. (p xi)

Further on in the report, NESC describes the four aspects of Ireland's social welfare system:

- i. A suite of social insurance payments, entitlement to which is based on social insurance contribution histories;*
- ii. A parallel set of social assistance payments governed by means-tests and funded from general taxation;*
- iii. A universal payment in respect of dependent children, Child Benefit; and*
- iv. Ancillary benefits such as free travel. (p xviii)*

The Pandemic Unemployment Payment does not fit neatly into this description as it was a “completely individualised” payment “and thus every adult in a household who was at work and has lost their job due to the pandemic is able to receive the PUP in their own right and without application of the limitation rule which operates for Jobseeker payments.” (p126) According to the Central Statistics Office there were 605,721 on the PUP in April 2020, the highest month during the pandemic, while in November 2021 this figure had fallen to 54,999, before rising again as new restrictions were imposed before Christmas. What is remarkable is that this payment was significantly higher than the existing main claimant

payment, yet when the economy re-opened recipients returned to employment, some to new employment, demonstrating the importance of supporting people to better manage periods of unemployment through enhanced financial supports. Over the same period the Live Register went from a high of 244,562 people in July 2020 to 162,898 in September 2021, while in December 2021 it was slightly higher, at 163,856 people.

In the first part of the Commission on Taxation and Welfare’s report questions are asked about Ireland’s tax and social welfare system: what works well and what does not.

With regard to what works well, the INOU is keenly aware that though existing social welfare rates leave many people struggling on a day-to-day basis, a reality inflationary pressures are exacerbating, the fact that there is a floor below which people should not fall is a welcome aspect of the Irish system. However, as this floor is not universally available, a lot of unemployed people can find themselves unable to access supports once their Jobseeker’s Benefit payment comes to an end as their personal or family circumstances make them ineligible for the means-tested payment Jobseeker’s Allowance. The rule bound nature of Ireland’s social welfare system leaves many people outside of its net and related services, creating difficulties in accessing employment, education and training programmes designed to assist people to re-enter the labour market or attain better employment.

In NESC’s Report 151, *“The Future of the Irish Social Welfare System: Participation and Protection”*, nine principles within the existing social welfare system were identified, and these are important principles to be maintained and developed as Ireland seeks to improve its tax and social welfare systems. The principles are as follows:

- i. Adequacy—payments should be adequate to prevent poverty, which should be judged in line with prevailing living standards.
- ii. Redistribution—the attainment of a significant redistribution of resources is a widely accepted aim of social policy and social welfare payments are an important part of the redistributive process.
- iii. Contributory—whereby there is a direct link between contributions paid or credited and entitlement to a varying range of benefits which are payable if, and when, particular contingencies arise.
- iv. Solidarity—whereby contributions paid by insured persons are not actuarially linked to benefits at the individual level but can be distributed to support other contributors. It is therefore an expression of solidarity between different earning groups and different generations.
- v. Comprehensiveness—any social welfare system must be comprehensive if it is to be effective, with a safety-net provision, without stigma, for any residual categories which may emerge.
- vi. Consistency—it is essential, in the social welfare system, that identical needs and circumstances be, as far as possible, dealt with identically, and also integrated with other social policies such as labour-market policy, health, education, housing, childcare and transport.
- vii. Simplicity—the social welfare system should be as simple as possible for both claimants and administrators.
- viii. Equity—where there should be equitable treatment among different recipients by reference to their need and to their record of contributions, and there should be intergenerational fairness.

- ix. Sustainability of funds to ensure finances are available to pay for pensions and other social welfare commitments today and in the future.

In the *Promoting Employment* chapter in the Commission on Taxation and Welfare particular reference was made to the recommendations contain NESC's report 151, "*The Future of the Irish Social Welfare System: Participation and Protection*". Four trajectories for reform were identified as follows:

- i. Ensuring Income Adequacy and Alleviating Poverty
- ii. Modernising Family Supports to Reflect Gender and Care Needs
- iii. Supporting High Participation
- iv. Enhancing Financial Sustainability

This submission will look at each of these and the concerns raised, and issues discussed at the INOU online events on Ireland's social welfare system.

### Adequacy / Promoting Employment

A key concern for the INOU is that the issue of income adequacy is properly addressed and that social welfare payments are set at a level that (i) lift people above the poverty line and (ii) support them to meet a minimum essential standard of living (MESL), which should be informed by the work of the Vincentian Partnership for Social Justice.

Amongst the issues raised with the INOU about the existing system are:

- The diversity of rules, the inconsistency of access and application across the system, a system that is often re-active rather than positively pro-active.
- And though feedback suggests that the experience of applying for PUP online appeared to be more equitable, inconsistencies still arose, and it was hard to identify why there was any difference at all in accessing the payment.
- It was also noted that the simplified forms for PUP and that it was paid into the recipient's bank account were useful developments. It is particularly important that a person receives their social welfare payment in a manner similar to how they would receive their wages<sup>2</sup>.
- The issue of inadequate, inconsistent information arises for both people accessing information and support and people working in local organisations. This issue arises with regard to the social welfare supports people may or may not be entitled to; what is or is not taxable; what supports are available for people who make the welfare to work journey; and what will be the difference in the income they obtain should they make this journey.
- Over the years a number of specific issues have been raised including that the top-up of €22.50 on Community Employment / Tús is too low; pre the previous crisis people in receipt of a One Parent Family Payment or Disability Allowance could retain these payments while participating on Community Employment; there is a need to support people to cover the cost of returning to / entering work, the high cost of transport and childcare are of particular concern.

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<sup>2</sup> On January 26th, 2022 the Minister for Social Protection, Heather Humphreys TD, announced that jobseeker payments will return to the post office in line with the easing of Covid-19 restrictions. People on this payment should be given a choice on how they receive their payment, supporting the Post Office network should be dealt with separately.

- The sustainability of jobs, the precarity and uncertainty of a lot of work available, and a sense that fulltime permanent jobs are gone is an issue for people making the welfare to work journey, and those supporting them on the ground. There is a need for protection for people in work and for people to be able to access decent jobs.

*Ensuring Income Adequacy* was one of NESC's four trajectories for reform, and in Report 151 they noted the need:

- To alleviate poverty for those most at risk of poverty, NESC suggests that it would be useful to have an agreed mechanism for increasing social welfare rates, and that this mechanism should take into account the adequacy of payments for those population groups most at risk of poverty.
- An independent indexation group could be established to undertake this work, and to advise government on the appropriate rate of increase. (p86)
- universal child benefit paid in respect of all children with an automatic supplement payable in respect of children whose families are in receipt of a social welfare payment or in low-paid employment. (p87)
- good services are required in addition to income supports to prevent poverty and support participation in the labour market. Research shows that high net costs for services are a disincentive for parents in particular to move from welfare into work, (p87)

### Services / Promoting Employment

Access to good social welfare and employment services is critical, not only for people who are unemployed but, for Ireland's social and economic development. In a changing world of work, everyone of working age needs to be able to access good information and supports to make informed and sustainable employment decisions.

One of the issues the COVID-19 pandemic highlighted was the importance of digital skills and the wherewithal to be able to develop and use these skills. The impact of digital poverty on people's ability to participate was noted, with a real risk that people who were less well-off would be left further behind. Initially there was an assumption that this was primarily an issue for older people, but feedback from local organisations noted that some young people were also finding it difficult to learn online or apply for a job. Concerns were raised that not everyone has a broadband connection, many people live remotely, others in accommodation with little privacy, and / or cannot afford it.

The importance of in-person supports was raised, and the need to provide the supports and spaces for people to further develop their skills and navigate a rapidly changing world. The enhanced capacity of frontline staff across the system to support such engagement is critically important. There is a need to improve signposting and ensure people are referred to the most appropriate service for them, that they are not 'sent around the houses', but are offered real choices.

*Supporting High Participation* was another one of NESC's four trajectories for reform, and in Report 151 they noted the need:

- One of the key areas identified in The Developmental Welfare State is the development of a high participation economy in which worthwhile employment would be a genuine option for everyone. (p98)
- NESCF proposes that a tripartite group (e.g. the LEEF) or similar body should assess the type of reforms which would achieve flexibility and security for the greatest number of workers, in the interests of promoting quality work which allows flexibility. (p99)
- Research, including that carried out for NESCF's study on low work-intensity households, shows that effective public employment service engagement with groups more distant from the labour force is characterised by a number of elements (INOUE, 2018; Whelan, 2018; Bonvin, 2019). These include tailored supports, greater intensity of support, a focus on the person's interests, adequate time to build trust, clear communication, and the provision of good information and career guidance. (p100)

### Welfare and Work / Promoting Employment

Amongst the issues raised under the heading 'interaction between work and the social welfare system' at the INOUE workshops were:

- The interaction between different types of supports which can create an either / or scenario that may not be conducive to addressing a person's unemployment in the longer term. One of the examples given was once a person is in receipt of a Partial Capacity Benefit (PCB) their employer cannot apply for the Wage Subsidy Scheme.
- For people on a Jobseeker's payment, the impact of the rule that one hour's work is in effect a day of work, which often penalised workers who have a short weekly working hours spread out over multiple days. It is recommended that the Department of Social Protection should redefine a "working day" to allow for the kind of jobs that are affected by rules like the 4 in 7 days. It was also suggested to do the means test / assessment over a month not a week. An example given was in a home help situation where the person might get 30 mins a day one week and be completely cut off but work 25 hours another week and still retain some payment. This raises issues of sustainability when people are living week-to-week.
- Working Family Payment (WFP) and Back to Work Family Dividend (BTWFD) were seen as valuable and a great way to help people get back to work. Though concerns were raised about the qualifying hours required for the Working Family Payment in what is now a more flexible labour market, and the delays in processing claims.
- When supporting a newly employed person the Department of Social Protection's focus should be on safeguarding the individual and ensuring they are financially secure for a period after the person has commenced work. There should be a more holistic approach to supporting the person to successfully make the transition.
- Amongst the issues that come up regularly are the fears people have of what they may lose if they take up work, there is a lack of consistent information provided by the Department on what supports are available, what supports people may be able to retain.

## Supportive Flexibility / Promoting Employment

*Modernising Family Supports* was another one of NESC's four trajectories for reform, and in Report 151 they state:

- The Council believes that the social welfare system should reflect and accommodate changing patterns of household and family formation, the widespread commitment to equal gender roles and rights, and sharing of family responsibilities. (p91)
- NESC proposes that it would be useful to apply the changes made in income supports to lone parents to QAs (Qualified Adults) also, as originally planned by government. (2006)
- NESC also proposes that various aspects of individualisation applied internationally be applied in Ireland, phased in over time, to couples in receipt of welfare payments.
- These aspects of individualisation include claiming, means-testing, benefit receipt, conditionality, job-seeking and activation. (p92/93)
- NESC proposes that more flexible work options be developed (p95)

One of the aspects of the current social welfare system that will need to be seriously reviewed if Ireland is to provide a more holistic and family friendly system is *Genuinely Seeking Work* conditionality, which assumes that anyone in receipt of a Jobseeker's payment is available for and seeking fulltime work, regardless of their personal or family circumstances.

In the INOU's event participants noted that:

- Genuinely Seeking Work (GSW) applies regardless of the circumstances of the person. Amongst the examples discussed was someone living in a rural area with limited employment opportunities. And though many people undertake long commutes to get to work, the limited provision of public transport, the cost of running a car could make the transition from welfare to work very difficult for people reliant solely on a welfare payment<sup>3</sup>.
- Accessing part-time work is not seen as complying fully with GSW, yet for many people with caring responsibilities, invariably women, part-time work may be a more appropriate option.
- Participants noted that in its current form GSW is very rigid, that it is based in an understanding of the labour market that is now dated and called for a broader understanding of how the word 'reasonable' is applied.
- Concerns were also raised for people on Jobseeker's payment who have a disability that creates challenges for them accessing employment, and meeting the GSW criteria, but may not be recognised as a qualifying condition for a Disability Allowance.
- During the discussion participants felt it was important that a person engagement with the activation process be recognised, that the development of the personal progression plan should carry more weight, and that more tailored supports and flexibility are required. The latter is particularly important if individualisation becomes the norm and existing services are opened to a wider group of people, in particular women, who may not be available for or seeking full-time work because of their other responsibilities.

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<sup>3</sup> It should also be noted that it is extremely difficult for people to get car insurance if they are unemployed.



- A call was also made for the Department of Social Protection to be more respectful of the individual, their background education and lived experience.

### Social Insurance / Promoting Employment

*Enhancing Financial Sustainability* was the final one of NESC's four trajectories for reform, and in Report 151 they note:

- Currently, the Social Insurance Fund does not have adequate reserves to pay for estimated pension provision in future. In addition, even if the ratio of workers to retired people stays the same as currently, those working at present do not pay enough contributions into social insurance to pay for the benefits they are likely to receive.
- Exactly how the estimated deficits in social insurance and welfare funds can be addressed is subject to debate. A range of suggestions have been put forward internationally; for example, reducing benefits, greater means-testing of benefits, increasing contributions/taxes, increasing the age at which pensions can be taken (see e.g. Kitao, 2014; Heritage Foundation, 2011), and setting up a Pensions Reserve Fund, as happened in Ireland. (p104)
- Increase the number of people in paid employment and making PRSI contributions; requires significant state support to provide access to childcare.

Later on in the report they raise questions about *social insurance* including:

- Should an individual's entitlements be more explicitly related to their contributions?
- Should there be a pay-related element to social insurance payments?
- Should the level of contributions, especially those of employers and the self-employed, be increased to strengthen the finances of the Social Insurance Fund?
- Should a better balance be struck between contributory principles, on the one hand, and principles of redistribution and solidarity on the other?
- How should people with inadequate contributions be supported? (p123)
- The International Labour Organization (ILO) has noted the role that can be played by higher social insurance contributions in restoring the finances of social insurance funds after the pandemic. (p129)

On the issue of *social insurance* participants at the INOU event queried the relationship between Jobseeker's Benefit (JB) and the recipient's previous pay. The top rate for the main claimant is the same as that for any working age payment: €208 since January 1<sup>st</sup>, 2022. However, if the unemployed person claiming JB earned less than €300 per week, then their payment is pay related: from €220 up to €300 the personal rate of payment is €162.90; from €150 up to €220, it is €134.20; and less than €150 it is €93.30. They also wondered why there is no Christmas bonus for people on a JB, especially as the payment is no longer wage related and other supports like mortgage relief are gone. If a person moves from fulltime work to €208pw it can be hard to cover their costs of living and debt can become a serious issue.

The gendered nature of the existing system was discussed. It was noted that the journey from JB to the means-tested payment Jobseeker's Allowance does not work out from everyone, for example: if the person is under 25 and living at home their parents' income is taken into account; if older and they have a partner the partner's income is taken into account; and / or they have means themselves. These rules have particular implications for

young people and women and can lead to their exclusion from income supports and employment services. However, this situation also arose for men during and after the 2008 crisis. The increased focus on activation and employment services linked to a Jobseeker's payment has meant that unemployed people, regardless of years of work, who do not make the transition from JB to JA can find themselves without adequate supports or full access to services.

Concerns were also raised about a lack of information on what exactly PRSI contributions entitled people to or not. Again, the complexity of the system was noted, and one participant wondered does the Department of Social Protection really want people to know about and be able to access the right supports. The critical importance of plain English communications was also cited.

## Climate

There is no denying the daunting scale of the climate challenge facing Ireland. A country's tax system can be used in two primary ways: one to raise revenue to run the country; the other to encourage a change in behaviour, either to encourage investment in an activity seen as important to undertake or to discourage behaviour seen as detrimental to a person or community's well-being.

The charge introduced for plastic bags in shops is a good example of a tax / charge being used successfully to change behaviour and discourage the prolific use of plastic shopping bags, that were a serious litter and environmental issue.

However, the downside of using the tax system to change behaviour is that it assumes that everyone is in a position to afford the alternative to the discouraged behaviour, that their income is such that they can avail of the tax measure concerned, but this is not always the case.

Moving to more environmentally sustainable energy provision and use is a key goal of the Government, yet for many people making this adjustment at the personal / family / communal level requires additional resources that people struggling on a day-to-day level are unlikely to have. The rise in the cost of living illustrates this dilemma, in particular Government's commitment to raise carbon taxes at a time when those less well off are reliant on less environmentally compatible fuels, or who live in areas with little or no public transport.

It is absolutely critical that Ireland's welfare system supports people to address the challenges facing them on a day-to-day basis, while collective action is supported through targeted public expenditure as Ireland seeks to properly address the implications of climate change over the coming decade.

## Housing

It is of critical importance that people who lose their job, who are unemployed are supported to maintain or address their accommodation needs, that as people seek to find employment that they are not also dealing with the possibility or reality of homelessness. The tax and welfare system have a role to play to support people with particular housing

needs, but the scale of the challenge facing Ireland demands a significant level of investment and an active role by Government at all levels. Though many commentators have queried the capacity of *Housing for All* to deliver what is so urgently needed, it is important that it is properly implemented. But it is even more critical that Ireland develops on an on-going basis a truly sustainable, future-proofing, and inclusive approach to this vital aspect of Irish society.

### Supporting economic activity

The focus of the on-line questionnaire in this section was very much on the tax system and its interaction with the various parts of the private for profit sector. Yet, for some people who experience discrimination or exclusion in the labour market self-employment can be an important avenue to address their unemployment. The Back to Work Enterprise Allowance (BTWEA) is an important support to facilitate them to do this<sup>4</sup>.

According to the latest figures there were 2,268 participants on BTWEA in January, 2022, a decline of 380 over the past year. The scheme runs for two years, but the INOU believes that an additional year should be introduced to support people to make the most of this option with the participant retaining 50% of their social welfare payment in the third year. Such a development could be part of the Government's expressed wish in the *Economic Recovery Plan* that *"A range of measures will be introduced to support young people, disadvantaged groups and people distant from the labour market to find employment"*. (p15)

It is also welcome that in the Economic Recovery Plan the Government notes the importance of *"Supporting Social Enterprise, which can provide access to jobs for the most marginalised in society, including through the National Social Enterprise Policy 2019 – 2022 and the Working for Change: Social Enterprise and Employment Strategy"*. Resourcing community led social enterprises to address issues of concern for them and to empower people themselves to address their needs appropriately will be particularly important.

In the section entitled An Inclusive Approach the Government says, *"An increased focus will be placed on building an inclusive society and labour market with greater emphasis on good quality employment, increasing participation and reducing barriers as the economy recovers, ensuring the benefits of the recovery are widely shared."* Such a development will be critical, and community based organisations have a key role to play *"as Ireland moves through the recovery, a space to discuss areas of shared concern affecting the economy, society, the environment, employment and the labour market more broadly must be ensured."* (p46)

### Tax expenditures

According to the Report on Tax Expenditures 2021<sup>5</sup>, published in October, 2021 as part of the budgetary documentation, Ireland forwent an estimated €7.1 billion in tax expenditures

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<sup>4</sup> During the response to the 2008 financial crisis a Short-term Enterprise Allowance was also introduced which facilitates people to transfer their Jobseeker's Benefit to this payment and seek to start their own business. In January 2022 there were 352 people on the STEA, 192 more people than January 2021.

<sup>5</sup> Available at <https://www.gov.ie/en/publication/7e491-taxation-measures/>

in 2020, a figure the report notes *'does not reflect the full amount of such expenditure'*.

In the text on the definition used by the Department of Finance and the Revenue Commissioners it states *"Both the Department of Finance and Revenue use the revenue foregone method to estimate the cost of tax expenditures.*

*A critical assumption made in the revenue foregone approach is that taxpayers do not change their behaviour in response to the tax expenditure concerned. In reality, behaviour is likely to change if an incentive is withdrawn. This implies that the value of the tax base would change, and the additional revenue received from the measure's withdrawal might be less than projected in the total tax expenditure estimate."*

The report goes on to flag alternative approaches, presumed to be more complex to undertake, and therefore a less attractive option. Given the scale of the expenditure forgone it would be important for a more comprehensive methodology to be developed by the Government; to ensure that whatever economic or social policy the tax expenditure has been developed to support is still relevant; and more importantly to ascertain if this goal(s) could be more equitably and effectively attained through targeted public expenditure.

### Public health

As a matter of urgency properly implement and resource *Sláintecare*.

### Administration

The COVID-19 pandemic demonstrated how flexible and supportive public administration can be: the roll-out of the Pandemic Unemployment Payment (PUP) was unprecedented in its scale and speed; PUP and the Enhanced Illness Benefit Payment provided timely income supports to people who would otherwise have struggled at a very difficult and challenging time. For many people the opportunity to apply for these supports on-line and receive them into their bank accounts within a short period of time meant that there was no discernible difference to how they would receive their wages. The positive impact of this administrative approach on people, how it supported them to manage their lives as they had being<sup>6</sup> should not be underestimated, the welfare system mirroring the world of work is more appropriate from a welfare-to-work perspective, and particularly important if people are living in areas where accessing services is difficult and costly.

The Irish tax and welfare systems must adopt a strong pro-active attitude to information dissemination, seeking to ensure that everyone living and working in Ireland is aware of their rights and entitlements, what they can seek and where, what information and documentation is required of them to engage with the tax or welfare systems. And though online engagement may be more conducive to facilitating such provision, it will be essential that people for whom online engagement is not feasible are properly catered for and have full access to meaningful supports and services.

### Thank you for your time and consideration

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<sup>6</sup> Notwithstanding the difference in income levels, which greatly impacted a lot of people.

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### **Irish National Organisation of the Unemployed (INOU)**

*“The INOU is a federation of unemployed people, unemployed centres, unemployed groups, community organisations and Trade Unions. The INOU represents and defends the rights and interests of those who want decent employment and cannot obtain it. We promote and campaign for policies to achieve full employment for all. We also campaign for an acceptable standard of living for unemployed people and their dependents. The INOU is an anti-sectarian, anti-racist, non-party political organisation which promotes equality of opportunity within society.” (INOU Mission Statement)*

The organisation has almost two hundred affiliated organisations and six hundred individual members. We work at the local and national level on issues affecting unemployed people through the provision of training and welfare rights information services; analysis of Government policies and related advocacy work; and working with a wide range of other organisations on issues of common concern.