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INOUE Submission on the Review of the National Action Plan for Social Inclusion

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INTRODUCTION

The Irish National Organisation of the Unemployed (INOUE) welcomes this opportunity to make a submission to a review of the implementation of the National Action Plan for Social Inclusion 2007-2016 and the Updated Plan 2015-2017 (NAPinclusion 2007-2017).

“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.” (INOUE Mission Statement)

The organisation has 200 affiliated organisations and 300 individual members. We work at local and national levels 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.

This submission will cover the four areas identified in the Department of Employment Affairs and Social Protection’s public call for submissions, which included:

- The extent of progress made on the high-level goals and National Social Target for Poverty Reduction, taking account of the major socio-economic changes that took place over the period 2007 to 2017;
- The extent of implementation of the actions underpinning the high-level goals in NAPinclusion;
- The relevance and comprehensiveness of the monitoring and governance structures underpinning NAPinclusion; and
- Any lessons relevant to inform the approach to dealing with social inclusion at a cross-government level.

NATIONAL SOCIAL TARGET FOR POVERTY REDUCTION AND HIGH-LEVEL GOALS PROGRESS

Poverty Targets

- *NAPSI 2007-2016 Overall Poverty Goal: To reduce the number of those experiencing consistent poverty to between 2% and 4% by 2012, with the aim of eliminating consistent poverty by 2016, under the revised definition.*
- *Updated NAPSI 2015-2017 National Social Target for Poverty Reduction: The revised target is to reduce consistent poverty to 4 per cent by 2016 (interim target) and to 2 per cent or less by 2020, from the 2010 baseline rate of 6.3 per cent.*

On December 17th, 2018 the Central Statistics Office published the Survey on Income and Living Conditions, SILC, for 2017. At the national level the consistent poverty rate changed from 8.2% in 2016 to 6.7% in 2017, a long way off either national goal or target.

Looking at these figures from the perspective of people who are unemployed, key poverty indicators are much higher for unemployed people than the national figures. Their consistent poverty rate increased from 23.4% in 2016 to 24.1% in 2017. Unemployed people are not alone, as the consistent poverty rate for people who are 'not at work due to illness or disability' was 24% in 2017. Looking at these figures from a household composition, three households had a consistent poverty rate in double digits: 1 adult aged <65 at 20%; 1 adult with children aged under 18 at 20.7%; and other households with children aged under 18 at 11.3%. Households with no-one at work, often called 'jobless households', had a consistent poverty rate of 21.3% in 2017. These figures highlight the fact that not only are strong national targets / goals required, but sub-targets are also essential to address the poverty and social exclusion facing so many people.

Income Supports

- *NAPSI 2007-2016 Goal 6: Income Support - Maintain the relative value of the lowest social welfare rate at least at €185.80, in 2007 terms, over the course of this Plan, subject to available resources.*

Looking at the changes in working age payments vis-à-vis changes in the Consumer Price Index, Jobseekers payments held their own initially, as payments were increased to address the income inadequacy payments facing unemployed people and others of working age. However, this relationship changed over the rest of the period when working age payments were cut. While recent increases in these payments will be of assistance, it must be noted that the CPI is an overall index and as such its relevance to issues associated with poverty and income inadequacy is questionable. As noted earlier the poverty statistics for unemployed people are considerably higher than the national figures, and many people are living below the poverty line. The work of the Vincentian Partnership for Social Justice on the development of a Minimum Essential Standard of Living is a very important resource in looking at the actual living costs of people with fewer means and the resources they require to meet these needs. And it is evident from this work that a more ambitious target should have been set.

In the *Updated National Action Plan for Social Inclusion 2015-2017*, on page 4, they note *"The overall strategy for active inclusion is set out in the National Reform Programme 2011 and is framed around the 'developmental welfare state', as outlined in NAPinclusion."* An active inclusion strategy should incorporate a focus on adequate minimum income; inclusive labour markets; and access to quality services. There is a lack of evidence that such an

approach was put into policy and practice across the whole of Government, yet without such deliberative action it will be hard to achieve real and progressive change.

Employment

- *NAPSI 2007-2016 Goal 5: Employment and Participation - Introduce an active case management approach that will support those on long-term social welfare into education, training and employment. The target is to support 50,000 such people, including lone parents and the long-term unemployed, with an overall aim of reducing by 20% the number of those whose total income is derived from long-term social welfare payments by 2016. This target will be reviewed in the light of experience;*
- *Updated NAPSI 2015-2017 Goal 7: Youth Employment - Engage all unemployed young people under the age of 25 through Intreo, with a view to ensuring that they receive a good-quality offer of employment, continued education, an apprenticeship or a traineeship within a period of four months of becoming unemployed or leaving formal education. Enhance employability skills for young people through non formal and informal learning opportunities.*

Activation

- *Updated NAPSI 2015-2017 Goal 5: Labour Market Activation - Provide all registered unemployed people with efficient, work-focused income supports together with the supports and direction required to help them plan and implement a pathway into employment. In particular provide people who are long-term unemployed and young unemployed with opportunities to enhance their job prospects through value-adding job search, guidance, work experience, education and training activities.*
- *Updated NAPSI 2015-2017 Goal 6: Welfare to Work - Provide effective support to jobseekers and recipients of the jobseeker's transitional payment (former recipients of One-parent Family Payment) via the Department's Intreo offices and provide information on available in-work supports should they transition into employment.*

Given the changes to the social protection and employment services over the period covered by NAPSI/NAPSI Update, the issues of employment and activation will be taken together. There was a certain logic to bringing together income supports and employment services under the one Department. However, there have also been a number of draw backs to this arrangement. In particular the relationship that exists between the system and the individual. For example, when it is one of income supports, there is a strong focus on establishing entitlement and ensuring that people are indeed eligible for the supports they are seeking, and this can create an 'us and them' dynamic. Such a dynamic is not helpful when providing employment services. In this relationship the jobseeker must see the

employment service provider as really helping them to secure a decent job, and if required referring them to an education and training provider who will work with them to improve their skills and employment prospects. Feedback the INOU has received from unemployed people highlights a system that can deliver on this, but that this delivery depends on the capacity and knowledge of the providers, and this can vary considerably across the system.

The changes that were made to the system happened at a time of high unemployment, and a one size fits all approach was evident. Yet any system should be adaptable and this should be built into its development, in particular to meet the needs of people who are more distant from the labour market. Looking at the changes from the perspective of active inclusion, there has been a sense of the system trying to slot people into the one designed for Jobseekers, the one payment that has conditionality attached. However, if Government is serious in using an active inclusion approach then the system must develop and demonstrate the capacity to include everyone of working age, regardless of whether or not they are on a payment. It must also develop an approach that puts the individual at the heart of the system and identifies what this person needs to progress on in their life.

There is a reality of discrimination in the labour market that is rarely acknowledged: even though there are stark unemployment / employment rates for unemployed people coming from certain communities, in particular Travellers, but also marginalised urban and rural communities. Ageism is also an issue, as is the discrimination facing people with disabilities, mental health and drug misuse issues. There is a lack of evidence that the State really tried to address these issues. People were left behind during the Celtic Tiger years, their exclusion was exacerbated by the crisis: issues NAPS needed to demonstrate it was addressing.

Some people are very distant from the labour market and an activation approach is not necessarily the best approach from them; they require a developmental approach, one that facilitates them to participate in the most meaningful way for them at the time, with a longer term objective of general access the labour market over time. This group also need access to a wide range of quality services, working collaboratively to address the person's needs i.e. putting the third strand of active inclusion into effect. During the crisis expenditure cuts had an impact on many services; new ways of funding and assessing impact have also thrown up challenges; and the people who have lost out are the more marginalised and vulnerable.

Other people are much nearer the labour market and what they need are not only job seeking supports, but for the State to proactively tackle exclusion in the labour market and pursue the second strand of an active inclusion approach, an inclusive labour market. Such a targeted approach is currently missing, and highlights an imbalance in activation policy and its implementation. The focus is mainly on the supply side of the labour market, and the jobseeker needs to adapt to fit in; there is too little on the demand side, and how the

employer needs to adapt to be inclusive. The State as a key employer could lead in this regard.

IMPLEMENTATION OF ACTIONS UNDERPINNING HIGH-LEVEL GOALS

In the *Updated National Action Plan for Social Inclusion 2015-2017*, on page 10 they note *“The Social Inclusion Report is one of several mechanisms for reporting on progress on poverty and social inclusion. The Department of Social Protection will continue to fulfil its responsibility to report to Government on implementation of NAPinclusion over the period to end 2017. It is envisaged that the next Social Inclusion Report will cover the period 2015-2016 and will be completed in early 2017.*

This report will include a focus on appropriate actions to support the implementation of the new goals. These actions will be agreed with all stakeholder departments during its preparation. The report will be coordinated by the Social Inclusion Division with update material to be supplied by the relevant Government Departments to inform progress.

This will be followed by an independent review of NAPinclusion for the period 2007-2017. The review will be carried out during 2017 in accordance with the priorities of the Government. It will further reflect on the lessons of 20 years of government policies for targeting poverty to inform the next round of NAPinclusion, as required.”

In November 2018, the *Social Inclusion Report Incorporating Annual Reports for 2015 & 2016* was published. This report is very much a description of existing or emerging Departmental work, but it is not clear how this work will deliver on NAPS. In NAPS 2007-2016, on page 20, it stated: *“Poverty and social exclusion can affect all age groups. It is multi-faceted and combating it requires a multi-policy response. This is reflected in the definition of poverty and social exclusion which the Government first adopted in 1997:*

People are living in poverty if their income and resources (material, cultural and social) are so inadequate as to preclude them from having a standard of living which is regarded as acceptable by Irish society generally. As a result of inadequate income and resources people may be excluded and marginalised from participating in activities which are considered the norm for other people in society.”

Many of the actions in that original report for people of working age were superseded by the incorporation of the National Employment Service into the Department now called Employment Affairs and Social Protection. Employment policy moved from the Department of Enterprise, Trade and Employment to the Departments of Education and Social Protection. Policy development included: *Pathways to Work; Further Education and Training Strategy; and the Action Plan for Jobs*. However, the challenge remains how to address the poverty and social exclusion facing people who may not have the wherewithal to engage

with an activation service; and what is going to be delivered for them to facilitate their participation.

MONITORING AND GOVERNANCE STRUCTURES RELEVANCE AND COMPREHENSIVENESS

An important element that has been missing from the current structures is the necessary on-going active inclusion of people experiencing these issues and the organisations working on these issues in the cycle of policy and practice design, implementation, monitoring, evaluation and re-design where appropriate. An annual Social Inclusion Forum, while very welcome, cannot alone complete this task.

Consultation cannot be a one way street, it must involve real debate and dialogue and feedback on input received. This would have created policy and implementation systems that had the demonstrated capacity to learn from all the key actors and provide the wherewithal to engage with them to make continuous improvements.

Policies, and the implementation of such policies, have real impacts on people's lives. Stemming from research and engagement to date, it is self-evident that circumstances must be created where people feel they are supported to play a real role in determining what needs to change to ensure a positive and constructive impact on their lives. To that end it is important that assessment of progress is not just income focused, but that the impact on people's lives of service design and delivery, inclusive of any existing gaps and deficits to be addressed, should also be assessed. Such assessments should have the capacity to capture the issues facing people who, for example, are living with a disability, are older, groups for whom that cost of living is invariably higher.

The third strand of the active inclusion approach, participation, must also be used and assessed. The cost of participation identifies and highlights very real challenges for people. For example, private transport costs can be prohibitive for young people, yet they may be reliant on it as there is no other form of transport that enables them to meet their activation obligations. There are other participative costs and challenges facing a wide range of people and these need to be acknowledged and progress made on meeting them properly analysed, evaluated and achieved.

The production of publications like the Annual Reports, Social Monitors and Social Impact Assessments are useful, though more timely production would be welcome. In terms of the Annual Reports there is a need to move beyond the descriptive piece to an assessment of impact across the three active inclusion strands. The Social Monitors and Impact Assessments reports cover the issues of poverty quite well, however the impact of quality services, or the lack thereof, and people's ability to participate in Irish society is missing from this work. The lack of quality services significantly impacts on people's ability to participate and manage their lives, which in turn exacerbates poverty, social exclusion, inequality and access to the labour market.

RELEVANT LESSONS TO INFORM CROSS-GOVERNMENT APPROACH

To date there has been a lack of a ‘whole of Government’ approach to seriously addressing social exclusion, poverty and inequality; there has been little evidence of a cohesive demonstrated commitment to addressing these issues; and there is a sense that they were seen as the responsibility of just one Department, the Department of Employment Affairs and Social Protection, which cannot resolve these issues on its own.

Yet to deliver on a NAPSI of substance, it must be seen as the responsibility of every Government Department and agency. Policies under their remit must explicitly spell out how they will address these issues with a clear timescale, milestones and markers of progress. The development and implementation of the Public Sector Equality and Human Rights Duty should play an important part in ‘*rights-proofing*’ policy in this regard.

To ensure an inclusive labour market, activation policy must be underpinned by the principles of social inclusion, equality and human rights. Sub-employment targets must be set to ensure that poor outcomes for people living in disadvantaged communities, Travellers and other ethnic minorities, people living with a disability, parenting alone and people who are long-term unemployed are not lost sight of in national targets. Such sub-targets are particularly important as Ireland is popularly perceived to be reaching ‘full employment’, an economic concept that can mask deep seated and entrenched structural exclusion. Discrimination in the labour market must be properly addressed and work undertaken with employers to ensure that they give real opportunities to people underrepresented in employment and in particular in decent employment.

Income targets must be set that lift people out of poverty and ensure that they can meet a minimum essential standard of living. A number of groups feature annually in the SILC data as having poverty rates that are multiples of the national rate: people who are unemployed; parenting alone; have a disability or an illness; living in a jobless household; living in accommodation that is ‘rented at below the market rate or rent free’.

Investment in the delivery of sustainable and good quality services across the life-cycle is critical. At present the poverty rates capture income inadequacies, but they do not capture the cost of living implications for groups and their ability to manage in a society where few services are universally available. There are particular issues that face people who are parenting alone; living with a disability or illness; are older. There are also issues that face people seeking to (re)enter the labour market: transport costs are a particular issue. Affordable and accessible transport is a critical factor in facilitating people to participate in society.