



The European Anti-Poverty Network (EAPN) Ireland

Submission to National Planning Framework

March 2017

Contact: Paul Ginnell. EAPN Ireland, 100 North King Street, Smithfield, Dublin 7, Email: [REDACTED]

The European Anti-Poverty Network (EAPN) Ireland Policy Group welcomes the opportunity to make a submission to Ireland's National Planning Framework.

As we stand in 2017 we have a lot to reflect on from our past as a country, including the experience of the recent crisis and how we dealt it. This left many individuals and groups in society in poverty and the damaged many of the services and supports which are central to ensuring the well-being of many, and in particular the most marginalised people in our country. This reality must not be allowed to repeat itself and should inform how we plan for the future, including ensuring that any economic crisis does not also become a social crisis.

Ireland faces a range of national issues including high poverty levels and the under-developed and under capacity public services. While these were exacerbated through the recent crisis they also existed prior to the crisis and are a result of the low tax, low public investment economic model being pursued by Ireland. This is most recently and starkly highlighted in through current housing crisis and specifically the deficit in social housing.

This submission focusses on a number of core principles which we believe should apply to the development the National Planning Framework if we have the ambition to move forward as an inclusive country with a sustainable future where no-one gets left behind.

This submission outlines three principles for Ireland's future.

- 1. A sustainable future**
- 2. An inclusive future**
- 3. A productive future**

1. A sustainable future

1.1 Balanced social, economic and environmental policy

The current policy priorities favour economic goals and ones which are often not consistent with a sustainable future for everyone. This is why we have high levels of poverty and inequality and are failing to meet our environmental targets, which themselves may not even be adequate to prevent a climate change catastrophe.

It is critical as Ireland moves forward that the National Planning Framework outlines an integrated approach to policy which ensures we have a sustainable future.

The UN 2030 Agenda for Sustainable Developmentⁱ provides integrated framework for social, economic and environmental development and a template for a balanced future and a clear structure within which the National Planning Framework should be placed. The Global Goals also connects our ambition at national level to global commitments and developments. A first step for Ireland must be to develop an implementation plan for achievement of the 2030 Agenda.

1.2 Poverty and Equality Impact Assessment

One means of ensuring that economic, social and environmental policy are progressed in a balanced and integrated manner is through the implementation of effective impact assessment. This means that the Irish Government needs to implement effective poverty, equality and gender impact assessments across all relevant policy areas, including economic and budgetary policy. It must therefore be applied to the design and implementation of policies related to the National Planning Framework which have a potential social impact. This process must be carried out in a transparent way at policy design stage.

The failure to carry out poverty, equality and gender impact assessments over the past ten years has been evident in increasing poverty levels. However, as the economy expands and Government introduces expansionary budgets, poverty, equality and gender impact assessment is even more critical.

We welcome the commitment in the current Programme for Partnership Government to *‘develop the process of budget and policy proofing as a means of advancing equality, reducing poverty and strengthening economic and social rights’* including the commitment to equality and gender proofing and developing the infrastructure in the Oireachtas to achieving thisⁱⁱ. While the proofing of the annual budgets is an essential process the commitment to wider policy proofing must involve a major review and strengthening of the current ineffective process.

1.3 Taxation and social Investment

Ireland’s tax levels as a percentage of GDP are 10% below the EU average. As a society we are also facing additional challenges in meeting the needs of our changing demographics. We also have large deficits in our public services, highlighted in the past two years by the European Commission annual Country Report for Irelandⁱⁱⁱ. However, the crisis in such areas as housing, health, care, transport and other public services is well publicised.

The availability and accessibility of these services across the country must also be resolved. Many people have to travel increasing distances to access essential services. The current crisis in our public transport system has emphasised the need for particular investment in our transport infrastructure throughout the country. It is critical that the transport infrastructure links people from more rural communities to urban centres. This has social and economic benefits and makes these rural communities more viable.

While the current EU expenditure rules restrict Ireland’s ability to invest, even greater restrictions are placed on Ireland by our low tax levels and narrow tax base. Ireland will never achieve an

ambition to meet the needs of its citizens if successive Governments stick to a policy of maintaining low tax levels and viewing taxes solely as a 'burden'. A path forward must be found to at least increase Ireland's tax levels towards the EU average. This must be done in a progressive and fair manner starting with immediate reversal of the policy to reduce the tax take through ending the Universal Social Charge. Increasing tax levels and investing in Ireland's social protection system and bringing our social services to a level which meet the needs of our citizens is essential if Ireland is to have a sustainable future.

Ireland also needs to step up to its obligations to tax justice and to stop facilitating corporations and banks to avoid their tax obligations^{iv}. Apart for revenues at national level and the damage to our national image it also has the impact of denying revenue to less developed countries.

1.4 Inequality and redistribution of resources

It has been shown that income inequality is not only bad for the most disadvantaged in society but is bad for everyone^v. Recent CSO data on income and poverty shows that in 2015 the top 20% of earners had 4.7 times the income of the bottom 20%. However, focusing on wealth, the 2013 CSO Household Finance and Consumption Survey^{vi} shows that the top 20% of income earners in Ireland have over 39% of the country's wealth. The survey highlights the difficulty in gathering the data and getting responses so the concentration of wealth at the top of income earners could be underestimated. TASC provides a valuable annually updated set of data on inequality in Ireland.^{vii}

It is clear that to address the issue of inequality involves the redistribution of incomes and wealth through the collection of taxes in a progressive manner and their redistribution through investment in our social protection system and public services.

Ireland needs to set itself a target for reducing the current levels of income and wealth inequality.

2. An inclusive future

2.1 Economic, social and cultural rights

Economic, Social and Cultural (ESC) Rights are enshrined in international law and play a fundamental role in the creation of a more just, inclusive and sustainable society. However in reality many people are denied these rights across a range of different areas^{viii}.

In 2014, the Constitutional Convention carefully examined constitutional protection of ESC rights and concluded in their Eighth Report of the Convention on the Constitution in March of 2014 that in principle the constitution should be amended to strengthen the protection of economic, social and cultural rights.

It is essential that the Government prepares to move forward to put a referendum to the Irish people based on the conclusions of the Constitutional Convention.

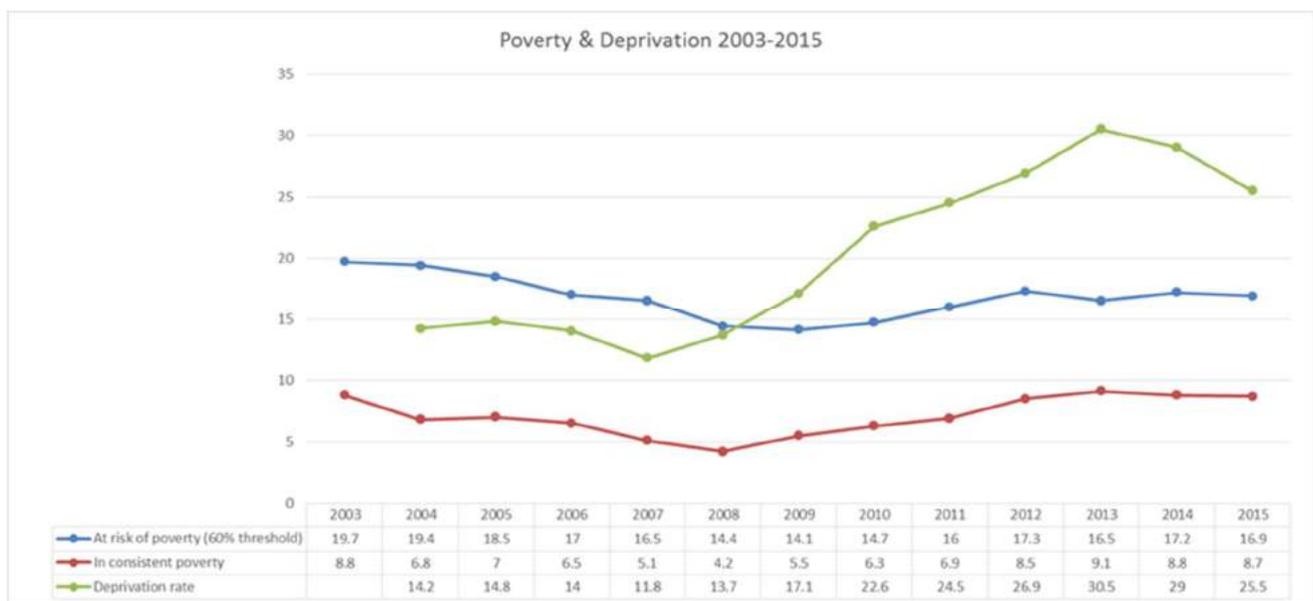
2.2 Poverty

The Survey of income and living Conditions 2015 shows that poverty reached crisis levels during the recession and still remains at these levels. The current Government target is to reduce consistent poverty to 4% by 2016 (interim target) and to 2% or less by 2020.

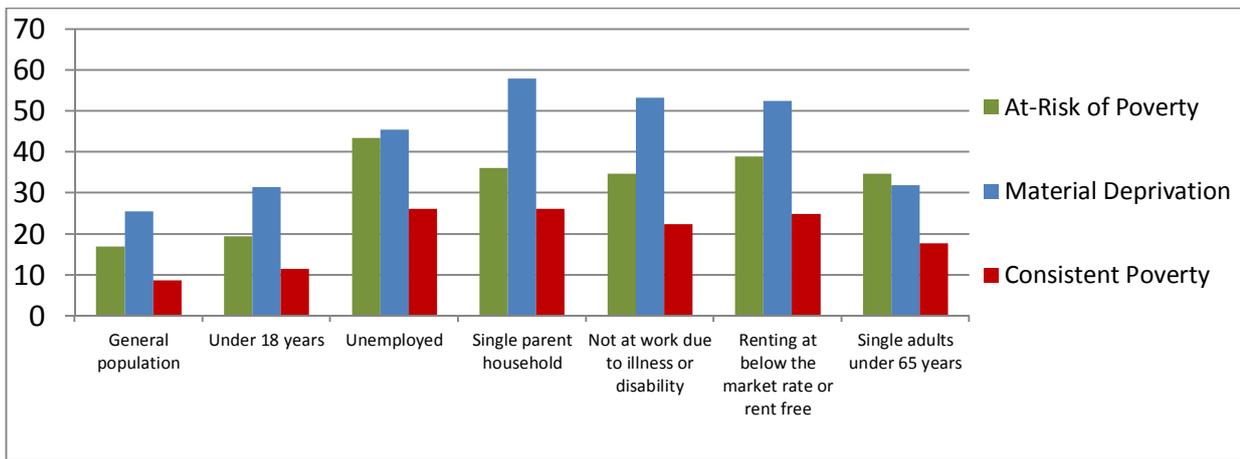
However, as the graph below shows consistent poverty in 2015 is at 8.7%, more than double the level in 2008. There are now over 403,000 people in consistent poverty.

Poverty is defined as *'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'^{ix}.*

This means that there are a very large number of people in Ireland who are denied their full participation in our society. This has to be addressed in the planning for our future.



Some groups and communities in society are particularly at risk of poverty. The table below highlights the poverty levels for a number of the groups covered by the Survey of Income and Living Conditions. Other groups which experience a higher risk than the general population include people who are homeless, migrants and many ethnic minority groups including Travellers. There are also specific gender issues relate to poverty.



Apart from being experienced by particular communities and groups poverty is also concentrated in particular urban and rural geographical areas^x.

Poverty has structural causes, is multidimensional and very connected to issues of inequality and social exclusion. Poverty can therefore only be addressed through integrated strategies which address both its causes and effects. This relates not only to our social policy but also to other policy areas, most crucially our economic policy, including regional planning. Poverty can also only be tackled if the communities most at risk are empowered to actively engage at all stages in decisions that impact on their lives.

Ireland has had two anti-poverty and social inclusion strategies over the past 20 years. Each of these strategies aimed to reduce or eliminate poverty. The initial progress under the National Anti-Poverty Strategy 1997-2006 has now been completely lost. The Government is now about to embark on drafting then next strategy. The next strategy and any subsequent ones must be ambitious and not be allowed to fail or progress lost as happened during the economic crisis.

In December 2015 EAPN Ireland published a briefing paper on poverty with proposals for the coming years which outlines the key elements of an integrated strategy^{xi}.

The National Planning Framework has a key part to play its part in contributing to the delivery of an integrated national anti-poverty strategy and must be a central consideration in its design and implementation.

2.3 Adequate income

Everyone, whether in or out of work, should have an income which allows them and their family to live a decent life. Social transfers play an important role in reducing poverty and providing many people with an essential safety net. In 2015 social transfers helped to reduce at-risk of poverty levels from 46.3% to 16.9%. This is one of the most effective uses of social transfers in the EU.

However, despite the €5 increase in most working age welfare payments in March 2017 social welfare levels are not sufficient to prevent people from falling into poverty or to provide them

with an income to have a decent life. In fact working age social welfare rates are almost €37 below the poverty line and in 2016 were inadequate to provide 198 of 214 urban family types dependant on social welfare with an income for a minimum essential standard of living^{xii}. Welfare rates for those under 26 years of age are lower are even less adequate. This is a critical element which needs to be addressed as a part of an integrated approach to addressing poverty.

The Vincentian Partnership for social Justice has highlighted the additional cost of living in rural areas^{xiii}. This is not reflected in how our social protection system operates.

It is also essential that social welfare supports are seen as a right and that those who access them are respected. Many people who access welfare supports are treated with suspicion and stigmatised, making what are difficult circumstances even worse. Those who are jobseekers should then be able to access the relevant supports and treated with dignity by those who provide them.

There is a general myth that social welfare payments are too generous and therefore are a disincentive to work. However, the evidence is that social welfare replacement rates in Ireland do not act as a disincentive to work. The Economic and Social research Institute (ESRI) report on replacement rates in 2015 showed 14 in 15 of those on jobseekers payments would be better off in work and 5 out of 6 of those who would not would still prefer to work, but that costs such as childcare prevent them from doing so.

2.4 Equality and the Positive Duty

Many groups in Irish society experience greater inequalities both in terms of opportunity and outcome than the general population. These groups are also covered under the nine grounds of Irish equality and human rights legislation. Ensuring that Ireland moves forward as a more inclusive and equal society involves addressing this inequality. This means not only preventing discrimination against these groups but also promoting their equality and economic, social, cultural and economic inclusion.

The Irish Human Rights and Equality Commission Act 2014 includes a new public sector equality and human rights duty. This is a positive development and puts a legal duty on public sector bodies to promote equality, protect human rights and prohibit discrimination. Implementation of this positive duty must take place and to do so requires a commitment at all levels of Government.

It is also crucial to maintain a focus on how to strengthen the promotion of equality, the protection of human rights and prohibition of discrimination across all sectors and areas of Irish society.

Many people continue to experience discrimination in access to services and employment based on their socio-economic status. This manifests itself because of someone address, being unemployed or receiving a social welfare payment etc. However, current equality legislation does not reflect this discrimination and these people have no recourse to the law. Also measures to

promote equality and address positive duty do not cover this reality. Therefore socio-economic status must be included as a 10th ground in Irish equality legislation^{xiv}.

The national Planning Framework needs to have due consideration to issues of equality and discrimination including the positive duty for public bodies.

2.5 Migration

Migrants have made a very significant contribution to the Irish economy and society and provide an important diversity to who we are as a people. Ireland must remain an open and welcoming country to migrants, particularly those who are seeking our protection from violations of their rights. This is critical as we plan for the future development of our country.

Ireland must have a humane approach to addressing the needs of asylum seekers and treat people with dignity and at a minimum ensure compliance with our international obligations. Our Direct Provision system does not do this, refusing the right to work and leaving people languishing in poverty and struggling to integrate once they receive refugee status. This situation urgently needs to be addressed. Our asylum system should be reformed and at a minimum implement the proposals of the Working Group to Report to Government on improvements to the Protection Process, Including Direct Provision and Supports to Asylum Seekers.

Just as Ireland is seeking the regularisation of undocumented Irish people in the US, so should Ireland establish a system of regularisation of undocumented migrants in Ireland.

2.6 Participation

The participation of communities in decisions that impact on their lives is crucial. This is particularly so for people living in more disadvantaged communities. This results in policies and programmes which lead to better outcomes for people and communities. This includes policies and programmes across issues such as health, housing, education and training, care, utilities, employment, transport and the building of integrated and inclusive communities.

Community development organisations play a crucial role in building the capacity of people to participate in this process and in their communities as a whole. This community development infrastructure was built up over time since the 1980s. However in the past ten years much of this infrastructure has been dismantled as successive Governments withdrew resources for autonomous community development organisations, particularly at a local level, while simultaneously making changes to the way the voices of the most marginalised communities and groups gets heard in policy making. Between 2008 and 2012 alone the reduction in supports is estimated at around 35%^{xv}. This will have a very negative impact on outcomes for these communities.

As the Government plans for the future it is essential that it reinvests in autonomous community development groups. This is a crucial part of ensuring that we have better policies and more inclusive and equal societies in the future.

The reformed structures at local level involving Public Participation Networks, Local and Community Development Committees and Local Economic and Community Plans must be structured in a way which ensures that marginalised groups and communities are able to actively participate and play a key role in the design and delivery of plans and programmes at local level.

The increase in the use of competitive tendering and commissioning in the delivery of community services is counterproductive. The result is the disempowerment of local communities and the distancing of the most marginalised communities and groups from participation in their own communities. It turns these groups and communities from active participants to recipients of programmes and services, which are often not as effective and appropriate as they could be. It also has the effect of turning organisations which normally work together into competitors for contracts to work in the communities. It also potentially results in community led and owned community development organisations or local development companies with many years of experience in an area being replaced by private, for profit companies. The current Social Inclusion and Community Activation Programme (SICAP) is an example of a programme which should not be tendered and which should be bottom up.

3. A productive Future

3.1 Quality jobs

In planning for our future and our regional development we need to be creating decent jobs. Those who work must be able to earn a decent wage which enables them and their families to live with dignity. This involves eliminating the causes of in-work poverty and precarious forms of work. The latest Survey of Income and Living Conditions for 2015 shows that consistent poverty levels for those in work has fallen to 2.1% but still remains high with over 16% experiencing material deprivation. This is one in four of all those experiencing material deprivation^{xvi}.

Living Wage Technical Group has calculated that a rate of €11.50 per hour is needed for a single person working full time to have a decent income^{xvii}. The gap needs to be closed between this rate and the current National Minimum Wage of €9.25 per hour. The needs of workers with families are higher due to additional costs.

Wage levels need to move towards a level which provides workers with an adequate income. The hourly rate calculated by the Living Wage Technical Group provides a clear target for the adequacy of the National Minimum Wage. This has social and economic benefits.

While an adequate hourly rate is a critical element of decent pay for workers it is only one element of ensuring that workers and their families have an adequate weekly income to provide them with a decent standard of living. The issue of precarious work is a particular problem which needs to be tackled if people are to have a quality working life and a decent standard of living. This issue has been well spelt out in the reports from the University of Limerick^{xviii}, the Joint Oireachtas Committee on

Jobs, Enterprise and Innovation^{xix} and previously in the 2012 report on decent work by the Mandate Trade Union^{xx}. Women and migrant workers are in particular impacted on by issues of precarious work.

Access to and affordability of services, including care, housing, health, transport services is also critical to the levels of pay necessary for a decent living, in particular for low-paid workers who have dependents for whom they will have to pay for care services. The number of hours worked and how income from work interacts with social welfare supports is also critical to ensuring a decent standard of living.

While the responsibility for providing a living wage which means workers and their families can afford an adequate standard of living should always be primarily the responsibility of the employer the reality is that many low paid workers rely on access to social welfare supports to supplement their income. In 2015 social transfers helped reduce the risk of poverty for those in work from 20.3% to 5.8%. Therefore in work benefits play a major role in supporting the transition from welfare to decent work and maintaining the adequacy of take home pay.

Following the coming into force of the Industrial Relations (Amendment) Act 2012, which reforms the Joint Labour Committees (JLC), the Labour Court is still in the process of putting in place the infrastructure for the new JLCs. To date only two of the eight Employment Regulation Orders outlining the wage rates in these sectors (cleaning and security) have been agreed. This process needs to be sped up and is essential that the JLCs are set at a level which provides workers with a fair wage for their work.

3.2 Inclusive labour markets

While recognising the some people either temporarily or permanently may not be able to work due to the different barriers they experience the labour market must be open to everyone who can work and the barriers addressed. Some groups with low levels of labour market participation include Travellers, people with disabilities, lone parents and some groups of ethnic minorities. Older people can also experience particular issues. There is also a gender employment gap.

This means addressing both supply issues related to education, skills or health and demand side issues such as the cost of or access to services, discrimination and the availability of jobs. Issues related to decent pay above are very connected to these issues.

Addressing the needs of those who are distant from the labour market must involve an integrated approach active inclusion approach for those excluded from the labour market as recognised at EU level and adopted by Ireland which involves access to adequate income supports, access to quality services and inclusive labour market^{xxi}.

References

- ⁱ United Nations <http://www.un.org/sustainabledevelopment/>
- ⁱⁱ A Programme for a Partnership Government, May 2016. [http://www.merrionstreet.ie/MerrionStreet/en/ImageLibrary/Programme for Partnership Government.pdf](http://www.merrionstreet.ie/MerrionStreet/en/ImageLibrary/Programme%20for%20Partnership%20Government.pdf)
- ⁱⁱⁱ European Commission, Country Report for Ireland 2016 http://ec.europa.eu/europe2020/pdf/csr2016/cr2016_ireland_en.pdf and 2017 https://ec.europa.eu/info/files/2017-european-semester-country-report-ireland_en
- ^{iv} Oxfam 2017. Opening the Vaults <https://oxfam.app.box.com/s/wn9mdt217isfp4ji8dzossuyxphb698d/1/22127067159/151665623369/1m>
- ^v K. Pickett and R. Wilkinson 2009. The Spirit Level: Why More Equal Societies Almost Always Do Better. <https://www.equalitytrust.org.uk/resources/the-spirit-level>
- ^{vi} CSO, 2013. Household Finance and Consumption Survey <http://www.cso.ie/en/media/csoie/releasespublications/documents/socialconditions/2013/hfcs2013.pdf>
- ^{vii} TASC, 2016. Cherishing All Equally 2016 Economic Inequality in Ireland http://www.tasc.ie/download/pdf/tasc_inequalityreport_2016_web.pdf
- ^{viii} UN Committee on Economic, Social and Cultural Rights, 2015. Concluding observations on the third periodic report of Ireland, July 2015 <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G15/150/67/PDF/G1515067.pdf?OpenElement>
- ^{ix} Government of Ireland 2007. National Action Plan for Social Inclusion 2007-2016. <http://www.socialinclusion.ie/documents/NAPinclusionReportPDF.pdf>
- ^x Pobal Maps: Deprivation Indices <https://maps.pobal.ie/WebApps/DeprivationIndices/index.html>
- ^{xi} EAPN Ireland 2015, Briefing on poverty, 2015 and proposals for 2016-2021 <http://www.eapn.ie/eapn/wp-content/uploads/2015/12/eapn-ireland-briefing-on-poverty-2015.pdf>
- ^{xii} Vincentian Partnership for social Justice October 2015, Budget 2016 Minimum Essential Budget Standards Impact Assessment http://budgeting.ie/images/stories/Publications/Budget_Analysis/Budget_2016_-_MEBS_Impact_Briefing.pdf
- ^{xiii} Vincentian Partnership for Social Justice. Minimum Essential Standard of Living Expenditure Budgets <http://www.budgeting.ie/rural-budgets/>
- ^{xiv} Equality and Rights Alliance, 2016. An analysis of the introduction of socio-economic status as a discrimination ground. <http://www.eracampaign.org/uploads/Analysis%20of%20socio-economic%20status%20as%20a%20discrimination%20final.pdf>
- ^{xv} Brian Harvey 2012. Downsizing the Community Sector. ICTU <http://www.ceeds.ie/files/resources/downsizingcommunitysector.pdf>
- ^{xvi} CSO 2017, Survey of Income and Living Conditions 2015. [http://www.cso.ie/en/releasesandpublications/er/silc/surveyonincomeandlivingconditions2015/](http://www.cso.ie/en/releasesandpublications/er/silc/surveyonincomeandlivingconditions2015/www.livingwage.ie)
- ^{xvii} www.livingwage.ie
- ^{xviii} University of Limerick 2015. A Study on the Prevalence of Zero Hours Contracts. <https://www.djei.ie/en/Publications/Publication-files/Study-on-the-Prevalence-of-Zero-Hours-Contracts.pdf>
- ^{xix} Joint Committee on Jobs, Enterprise and Innovation, November 2015. Report on Low Pay, Decent Work, and a Living Wage <http://www.oireachtas.ie/parliament/media/committees/Low-Pay,-Decent-Work-and-a-Living-Wage.pdf>
- ^{xx} Mandate Trade Union (2012), Decent Work? The Impact of the Recession on Low Paid Workers, http://issuu.com/mandate/docs/mandate_decent_work_report_2012
- ^{xxi} <http://ec.europa.eu/social/main.jsp?catId=1059&langId=en>