

**COMMUNITY PLATFORM**

**SUBMISSION TO  
THE UN COMMITTEE  
ON ECONOMIC, SOCIAL  
AND CULTURAL RIGHTS**

**FOURTH PERIODIC  
REVIEW OF IRELAND**



**COMMUNITY PLATFORM**  
CHALLENGING POVERTY & INEQUALITY

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# 01

# WHO WE ARE

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The Community Platform is an alliance of 31 national networks and organisations in the community and voluntary sector which was founded in 1996 as a mechanism to facilitate solidarity amongst organisations in the community sector that work to address poverty, social exclusion and inequality.

**Why we are making a submission to the Committee on ESCR**

We respectfully contribute this submission to provide an alternative perspective than that which is presented by the Irish State to the Committee. While we acknowledge the progress that has been made and the challenges to progress associated with the COVID-19 pandemic, the cost-of-living crisis and by the Russian war on Ukraine, we are confident that our document will assist the Committee by offering a perspective based on the lived experience of poverty and social exclusion, a selection of relevant research and reports from outside agencies and research institutes, and from our own work. We trust that its content will be carefully considered by the Committee.

We are pleased to include recent relevant research, in one case Government commissioned, which offers useful insights into what must change in order to improve the quality and outcomes of Government engagement with Civil Society. We bring our own lived experience of those working with people whose economic, social and cultural rights are not respected as they should be.

We propose a new approach to how the Irish state can engage productively with the community sector and work jointly to devise and implement new solutions to difficult challenges. See below section which presents our model for implementing a new Collaborative Governance approach in Ireland.

## **Submission methodology**

We appreciate support from the Irish Human Rights and Equality Commission that made the production of this submission possible. The process included a questionnaire to member organisations and two focus groups, one hybrid and one online only to maximise participation.

## **Submission structure**

The submission opens with sections on priority themes for Community Platform member organisations. These are

- The weaknesses in both consultation with Civil Society and the implementation of national policy and strategy
- The lack of disaggregated data and missed opportunities in how data is used by Government
- The absence of accountability in Government decision making regarding policy

Relevant Articles are then explored using a format of insights and observations followed by suggested questions. We offer these questions in the spirit of collegial respect for the Committee and hope that they assist the Committee. We also include recommendations to deepen policy impact, achieve better outcomes for those communities and groups that are most marginalised and that experience structural exclusion and enhance the nature of engagement between the state and Civil Society. Questions on the Articles are in Appendix 1.

## **Collaborative Governance**

*The Programme for Government 2020-2025*<sup>1</sup>, sets out the Government's commitments to social dialogue recognising "the importance of regular and open engagement with all sectors of society." It commits to the establishment of a Social Dialogue Unit in the Department of the Taoiseach and to "create new models of sectoral engagement."

<sup>1</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2022/https://www.gov.ie/pdf/?file=https://assets.gov.ie/130911/fe93e24e-dfe0-40ff-9934-def2b44b7b52.pdf#page=null>



The Community Platform welcomes the emphasis on new ‘models’ as opposed to a single approach to sectoral engagement between the state and Civil Society. This approach is particularly important as people continue to struggle with the cost of living while we rebuild our economy and support communities that have been severely impacted by multiple crises. We do this while also seeking to address the challenges of climate change. New effective models will support the delivery of the UN Sustainable Development Goals, by building more effective, accountable and inclusive institutions as committed to under Goal 16.

We believe that to move forward, the challenges with current models of engagement between the state and Civil Society need to be addressed. Community Platform members have identified a number of core concerns in current engagement, including

- a lack of joined-up thinking
- a lack of multidimensional and complementary approaches to solving issues
- limited collaborative leadership capacity
- the time and resources required of Civil Society to engage in consultation mechanisms when the cost of engagement is rarely matched by the benefits in outcomes
- a need and willingness from all participants in collaborative processes to learn from each other.

We are also concerned at the lack of clarity about implementation, accountability for lack of implementation, failure to reach goals, and the lack of processes to support the participation of affected communities in public policy development. It is commonly held that many structures and models of engagement employed by the Irish State are outdated and we need new ways of thinking and critical reflection.

To this end we published a Discussion Paper *Towards a Progressive Model of Collaborative Governance*<sup>2</sup> in 2022 and have engaged with the Department of the Taoiseach and other Departments on its content. In this document we propose a new approach to solving complex problems based on effective engagement between the state and Civil Society. This builds on the Platform's *Valuing Social Dialogue*<sup>3</sup> and sets out how new, innovative and more collaborative approaches to engagement can be created. We need approaches that are dynamic and fit for purpose, maximise involvement and that harness the expertise of organisations and communities.

### **Collaborative governance – our proposals for effective policy development and implementation**

There is extensive international research on the effectiveness of collaborative governance as an approach to addressing complex problems and issues. This approach has the potential to mobilise ideas, resources and support for jointly created solutions, in a way that does not marginalise issues within more traditional social dialogue processes which favour the dominant stakeholders holding economic power and privilege. We believe this approach lends itself to addressing critical challenges such as poverty, inequality, homelessness, climate change, and social exclusion.

To this end the Community Platform proposes mainstreaming collaborative governance as an approach to public policy with processes that are flexible, diverse and responsive.

Our principles of Collaborative Governance are:

- Leadership, with a real willingness to engage and a belief that the process will lead to better outcomes.
- Early trust building and processes to support dialogue and deliberation.

<sup>2</sup> <https://communityplatform.ie/publication/towards-a-progressive-model-of-collaborative-governance-a-community-platform-discussion-paper/>

<sup>3</sup> <https://communityplatform.ie/wp-content/uploads/2020/07/Valuing-Social-Dialogue.pdf>

- Identifying power differentials and transparent motivation for engagement from all participants.
- Collaboration with relevant stakeholders, and innovation in supporting different forms of participation.
- Co-design and shared decision-making. Informed and deliberative approaches and processes valuing relevant expertise and lived experience.
- Flexibility and innovation and linking mechanisms to the issue specific purpose they are required to serve.
- Willingness to adequately resource collaborative processes. Commitment to early planning, creating transparent and accountable implementation and monitoring mechanisms.

——— **We call upon the Department of the Taoiseach to show leadership and take ownership of the delivery of our proposals on Collaborative Governance which can herald the beginning of a new era of value adding, respectful and effective engagement between our sector and the state.**

# 02

# ENGAGEMENT FOR EFFECTIVE POLICY AND STRATEGY DESIGN AND IMPLEMENTATION

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This section summarises the experiences and observations of Community Platform members of participating in various Government strategies' development and implementation. We include recent research, commissioned by the Government, and a report by the OECD, both of which reflect our experience of engaging with Government and our experience of the implementation of strategies.

Community Platform members acknowledge that the Irish Government does consult with Civil Society Organisations (CSOs) on the development, implementation and monitoring of policy. We welcome the fact that CSOs participate on advisory and monitoring committees for various national strategies.

We would like to acknowledge examples of where consultation and engagement resulted in benefits for the communities represented by Community Platform members, such as:

- Opportunities to meet the Minister of State for Older Persons and Oireachtas Committees for example, where there was good engagement around energy poverty in 2022 and which led to the expansion for Fuel Allowance for older persons in Budget 2023.
- Engagement in the design, development and ongoing implementation of *Sustainable, Inclusive and Empowered Communities: a five-year strategy to support the community and voluntary sector*, from which a new, autonomous Community Development Programme emerged that has a built-in process evaluation.
- During the consultation and drafting stages of the Adult Literacy for Life Strategy when there was authentic engagement with the relevant CSO - the National Adult Literacy Agency (NALA).
- The positive experience of engagement by the National Women's Council in the design of the Zero Tolerance Strategy, for which the NWC were recompensed for their contribution.

Engagement in the design of policies/strategies and the implementation of these policies/strategies are too often viewed as separate, and it is disappointing that the engagement of CSOs in the Zero Tolerance strategy is not progressing to the implementation stage.

In general, it is the experience of Community Platform members that the quality and the sincerity that underpins the processes of consultation information and engagement varies greatly across different Departments and policy areas.

A major concern for CSOs representing those who are most marginalised in Irish society is the fact that often the contribution they make during the consultation phase for the development of a policy/strategy is not reflected in the final text of the policy/strategy. Consultation fatigue and burn-out is frequently mentioned by those who have had this experience repeatedly.

This comment sums up the frustration frequently mentioned in the consultation with Community Platform members for this submission:

*“Often I went to consultations in my own time unpaid. You can feel like you have wasted your time....we gave them good ideas but end up with stuff that won’t work”*

Another comment:

*“We have had lots of consultation with Government departments, but often it feels like a box ticking exercise on the part of the Government, to say that they have engaged with civil society”*

*“We’re on the ground - we know if it’s working or not”*

However, most consultation processes to date have been consultative rather than involving multi-stage engagement or co-design which is our goal. We note that while there can be consultation and engagement on issues in the initial phases of policy development this often declines as the process progresses, particularly if it is a legislative one. This often results in vagueness on timelines and updates leaving organisations unclear as to the status of the process. This results in frustration and can be easily avoided.

Community Platform members continue to have longstanding concerns regarding how Government addresses the challenge of Child Poverty. While there have been a variety of measures implemented, these have been disjointed and improperly targeted. We welcome the establishment of the Child Poverty Unit in the Department of the Taoiseach, and call on the Committee to encourage the Irish Government to allocate sufficient resources to ensure that the Unit can achieve its goal.

### **Strategies to address social issues**

*Sláintecare* is the 10-year blueprint for structural reform to the delivery of universal access to health. However, its implementation has experienced major delays and setbacks.

*Housing for All*, the Housing Strategy is another critical strategy that is failing to reach its targets and, in the case of social housing, has targets that were inadequate from the outset, failing as they do to reflect the current population. We are deeply concerned that there have been no efforts made to address this problem of our burgeoning population and to adjust the targets to dynamically reflect current and emerging need.

Of key importance to the Community Platform is the *Roadmap for Social Inclusion*. Despite the fact that the commitments were largely inadequate to deliver the targets set in the strategy, we are aware from our long-standing involvement in this strategy that commitment to it varies considerably across Departments.

## Consultation and implementation failures

The findings of the report<sup>4</sup> *Realising the promise of national equality policy: An evaluation of the processes of implementation of three national equality strategies*<sup>5</sup> supports our collective view that there is an implementation deficit with the majority of policies and strategies. Further, we note that this report focused solely on evaluating implementation processes as opposed to impact or outcome, which we argue are also significantly deficient. It is our view that a much stronger focus needs to be put on evaluating the impact of implementation.

The recently published OECD report *Strengthening Policy Development in the Public Sector in Ireland*<sup>6</sup> analyses the policy development process in Ireland focussing on three main areas that shape policy development: evidence, implementation, and legitimacy. The report states that “*direct input into policy design by or on behalf of vulnerable communities is uneven at present.*”<sup>7</sup> It urges collaboration “*and/or co-creating with other Departments or people likely to be affected by policy decisions.*” Chapter 4 of this report notes that the feedback from those consulted for the report (civil servants) echoed the views and experiences of Community Platform members for this submission citing deficits in consultation including uneven rural/urban divide, being invited to engage after decisions are made, greater focus on established and bigger organisations and “*limited co-creation*”.<sup>8</sup>

<sup>4</sup> This report was an independent evaluation by the Centre for Effective Services which sought to ascertain the effectiveness of the implementation processes of three national equality strategies - the Migrant Integration Strategy, the National Strategy for Women and Girls, and the National Traveller and Roma Inclusion Strategy. It was commissioned by the Irish Minister for Children, Equality, Disability, Integration and Youth (DCEDIY). It was launched in June 2023 and has useful findings which the Minister has stated will inform the future successors of each of the three strategies.

<sup>5</sup> <https://www.gov.ie/pdf/?file=https://assets.gov.ie/263523/64481c7e-eeb8-46a0-b09f-8c27e3864978.pdf#page=null>

<sup>6</sup> <https://doi.org/10.1787/6724d155-en>

<sup>7</sup> Using Evidence, Data and Strategic Foresight for Policy Development and Long-term Policy Issues in Ireland”, in *Strengthening Policy Development in the Public Sector in Ireland*, OECD Publishing, Paris.  
DOI: <https://doi.org/10.1787/f5eebc7b-en>

<sup>8</sup> OECD (2023), “Strengthening the Legitimacy of Policy Development in Ireland”, in *Strengthening Policy Development in the Public Sector in Ireland*, OECD Publishing, Paris. DOI: <https://doi.org/10.1787/2f7009b6-en>



### **Recommendations on Consultation and Collaboration**

It is striking to note that the findings from both the questionnaire and focus group undertaken for this submission echo closely the recommendations from the CES report in many areas notably clarity of role for CSO representatives, resourcing of CSOs to participate and engage with Government.

It is important to note that Government has outsourced many of its services, particularly in the areas of health and social care to NGOs. It is now commonly accepted that the sector cannot compete with the terms and conditions of employment offered in the public sector, with experienced staff leaving for positions in the public or private sectors. This is a threat to the sector being inclusive and equitable. We are disappointed that the Government has only selectively sought to address this problem, rather than addressing the challenge across the range of the community and voluntary sector organisations.

## Recommendations on Consultation and Collaboration (cont.)

Implement the proposals made in the Community Platform Discussion Paper, Towards a Progressive Model for Collaborative Governance, published in 2022, to strengthen collaborative governance, based on a set of clear principles. Core among these proposals is the establishment of a Collaborative Governance Advisory Body to oversee the implementation of a consistent and coherent process of collaborative governance across Government. We recommend that this Advisory Body would be led by the Department of the Taoiseach and would include relevant Department officials and civil society representatives.	01
Implement immediately all recommendations of the Centre for Effective Service report regarding implementation of national strategies.	02
Demonstrate a real commitment to a human rights / equality / inclusive approach to policy making and implementation by appropriate investment in an infrastructure of autonomous community-development that supports people to engage and resolve issues of concern in a meaningful and constructive manner.	03
Acknowledge the structural nature of some of the long-standing issues facing Irish society and accept the need to address these issues fundamentally in a whole of Government manner.	04
Increase funding for policy research by NGOs. Despite the funding levels already being inadequate the SSNO (Scheme to Support National Organisations) grant has not increased in years, despite cumulative inflation of over 20% in the period 2020-2024. This has resulted in many CSOs being unable to recruit and retain policy analysts to support their work.	05
Ensure that multiple modes of engagement and properly skilled people are involved when consulting with service users and the public.	06
Ensure that Civil Society is kept informed of the progression of legislation through the Oireachtas. Often a Bill will be brought up for debate or before committee without any notice to stakeholders who have engaged at an earlier stage resulting in deadlines for submission of amendments passing before stakeholders are able to engage. This process is exclusionary and undemocratic in that Civil Society struggles to participate effectively or access information.	07
Ensure co-production through formal yet clear mechanisms for the survivors of domestic violence and those working with them in dedicated support services to ensure that their lived experience is fed directly into policy-making at the Department of Justice and elsewhere.	08

## Recommendations on Implementation

**01**

Ensure that Government commits to updating the public on the progress of policy development to final strategy publication stage, especially if it involves a legislative element

**02**

Commit to implementation action plans for all policies.

**03**

Commit to ensuring that there is a clear focus on the impact and outcomes of policy in its design and implementation.

**04**

Commit to annual reviews for all policy.

**05**

Commit to generative evaluations for all policy.

**06**

Resource the Civic Forum to reach its potential to be a robust mechanism where Government progress is held to account.

# 03

# DATA - ITS CRITICAL ROLE IN INFORMING EFFECTIVE POLICY IMPLEMENTATION

<b>Community Platform concerns on how data is not maximised to improve policy</b>	<b>22</b>
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The Community Platform notes that capturing and using evidence to formulate policy is a primary element of the *Strengthening Policy Making in the Civil Service* framework for policy development. We also acknowledge that the Open Data Strategy published in 2017 and the Data Sharing and Governance Act 2019 have both improved how data is used in Ireland.

We understand that data outputs and inputs are often easier to capture than hard, or soft, data on outcomes, but this is concerning as it can lead to a partial view of the impact of policy on its target audience(s). We also know that there are large quantities of administrative data held by various departments such as Revenue, Social Protection, Education and Health which we do not believe have been adequately interrogated to provide useful information and knowledge.

We welcome the fact that at least 37 professional statistical staff from the Irish Government Statistical Service have been seconded to 16 Departments and that there is now a new *'Data Science and Statistical Support Unit (DSSSU)* which exists to provide “flexible resources capable of responding to crisis situations and/or meeting short term requirements in smaller Departments or Departments with limited analytical capacity”.<sup>9</sup>

We note that those civil servants consulted by the OECD for its report *Strengthening Policy Development in the Public Sector in Ireland* cited the lack of time and resources to carry out in-depth impact assessments which are critical tools to ensure that policy is appropriate and effective. We believe that there is scope to improve the capture and analysis of real-time data to support continuous improvement in policy implementation. The potential for data to play a powerful role in the development of responsive policy is not currently optimised in Ireland. We know that improving the usage, effectiveness and transparency of both poverty and equality impact assessments of policy - including at the ex-ante stage of policy design - is an important way to improve

<sup>9</sup> [www.cso.ie/en/media/csoie/aboutus/documents/0154501\\_2022\\_Annual\\_Report\\_on\\_Statement\\_of\\_Strategy\\_eng\\_web.pdf](http://www.cso.ie/en/media/csoie/aboutus/documents/0154501_2022_Annual_Report_on_Statement_of_Strategy_eng_web.pdf)

outcomes. In some cases there has been a reliance on cost-benefit analysis which does not focus on outcomes or qualitative probing of how policy can be modified to achieve better outcomes. We are deeply concerned that the data which is available is not being acted upon to impact policy and implement effective strategies which will enhance people's ability to exercise their human rights.

We welcome the announcement of the development of *A National Equality Data Strategy* made in March 2022, following on from an OECD recommendation that Ireland needs to improve its equality budgeting and achieve more accurate and informed data, and also the subsequent consultation which took place in 2023. We know that Ireland needs a more strategic approach to improving the collection, disaggregation and use of equality data.

### **Community Platform concerns on how data is not maximised to improve policy**

Our members have shared their insights into how data is currently leveraged to assist in policy development and implementation.

This section offers a summary of their concerns:

The ESRI uses the SWITCH<sup>10</sup> model to demonstrate impact which includes the indexation of wages yet Government Departments do not include indexation. This leads to different results and outcomes. We regret this lack of policy coherence in the use of useful data, which results in policy decisions that do not reflect reality.

The CSO offers a rich central source of information, with a time lag. Yet more could be done to achieve cross sectional analysis by subdividing data by age, gender, ethnicity, disability status etc to assist in the development of more detailed data which would lead to more responsive policy responses.

<sup>10</sup> SWITCH is a tax benefit microsimulation model for Ireland.

We continue to be concerned that data currently captured is not being acted upon to achieve better outcomes. For example, there has been strong data on Travellers' poorer health, education and employment for decades yet there remains a gap at policy level and implementation level which have not yielded the urgent changes required.

Likewise, despite a rich source of data and research on disabled people and lone parents these two cohorts continue to experience severe barriers to better outcomes in the areas of income adequacy, access to employment and access to appropriate services.

Ireland's homeless figures continue to deteriorate, with 9,309 adults and 4,105 children homeless in November 2023, according to Department of Housing figures.<sup>11</sup> Despite real-time data on this cohort, responses to meet need continue to fall short.

The use of data by Government to communicate a positive, yet misleading, message regarding the impact of budgetary measures on a specific cohort was noted in October 2023 which caused disappointment to our members. The ESRI analysis of Budget 2024 showed that lone parents who worked were worse off if inflation was taken into account yet Government stated that their situation had been improved. One Family's analysis of this budget showed that some lone parents, if working, could be better off but not those who experience barriers accessing work.

**9,309**

Adults homeless in  
November 2023

**4,105**

Children homeless in  
November 2023

<sup>11</sup> [www.thejournal.ie/homelessness-figures-november-ireland-6264900-Jan2024/](http://www.thejournal.ie/homelessness-figures-november-ireland-6264900-Jan2024/)

### **SILC- excludes vulnerable cohorts**

We are aware that the Survey of Income and Living Conditions, conducted yearly by the CSO, struggles to achieve enough respondents in its current configuration. We also note that the margin of error in SILC is plus or minus 5%.

We remain concerned that a range of minority groups that the Community Platform members represent and advocate on behalf of, are not captured within it. In its current configuration the SILC data set is unreliable. We believe that more qualitative data would yield richer and deeper insights and knowledge on minority groups which could be used to develop more effective and inclusive policy. We know that resources are not currently directed to SILC, rather to the Deprivation Index and the associated resource allocation model used in particular by the Department of Health.

We end this short summary of the challenges for how data is managed in Ireland with an observation on the importance of using commonly agreed definitions and meanings in the language used in data collection and analysis. We see how different agencies use language to describe the data they collect. For example, when capturing femicide, domestic violence and other categories of crimes, a commonly used definition and language is required to ensure that the data can be tracked and compared over time.



## Recommendations on Data

<b>01</b>	Develop a qualitative approach to the capture and analysis of poverty and deprivation data, focus on expanding the use of qualitative research tools and include the use of case studies in the analysis of the lived experience of minority groups to better capture the lived experience of minority groups which would yield richer more meaningful results to inform policy.
<b>02</b>	Increase the survey size for SILC with the objective of capturing more minority groups.
<b>03</b>	Widen the scope of SILC to ensure that the reality of lived experience of minority groups is captured and analysed.
<b>04</b>	Focus on expanding the use of qualitative research tools to capture the lived experience of minority groups.
<b>05</b>	Allocate more resources to achieve finer-grained cross-sectional analysis.
<b>06</b>	Agree and clarify the definitions used to describe various elements when using data to ensure that comparisons can be made.
<b>07</b>	Expand the use of the Minimum Essential Standard of Living methodology across Government departments and agencies as this provides a more realistic and fine-grained understanding of the needs of various cohorts to achieve a minimum standard of living.
<b>08</b>	Increase the use of both poverty and equality impact assessment in assessing policy proposals, especially in the Department of Social Protection.
<b>09</b>	Refine and improve the approach to measuring the different age categories over 65 years to achieve richer analysis.
<b>10</b>	Invest in more longitudinal studies of cohorts of interest.
<b>11</b>	Invest in improving the capture and analysis of real-time data to better understand various cohorts.

**04**

**NEED FOR  
GOVERNMENT  
TO BE  
ACCOUNTABLE  
FOR ITS  
DECISION-  
MAKING**

**Our members believe that accountability by the state in relation to policy choices and implementation is critical. Many of us have experienced instances where the state having consulted us, engaged with us, listened to our views, examined the evidence and data and heard our recommendations for improvement, then ignored this content and decided on alternative options which were not based on good practice, evidence or data.**

We find this difficult to comprehend, particularly when our recommendations are founded on good practice, are evidence-based, use both qualitative and quantitative data and findings to support our views and proposals.

Examples of the state eschewing evidence-based and data-supported proposals from Civil Society include:

The referendum of Article 41.2 of the Irish Constitution which deals with the deeply contentious and outdated place of women in the home will be held in 2024. Broader wording on care was recommended by the Joint Oireachtas Committee on Gender Equality and the Citizens Assembly on Gender Equality. Government could and should have given us stronger wording; wording that recognises and supports care in all its forms – the care of family members as well as the supports that professional care workers provide.

The introduction of enhanced Economic, Social and Cultural Rights (housing and essential healthcare, language and cultural rights and rights of disabled people) was considered in 2014 in the Constitutional Convention followed by a Private Members Bill in January 2021. However, this Bill did not proceed.

We note that a report<sup>12</sup> which describes the impact of policy on vulnerable lone parent households, which states “*It is important that policy developed in this area demonstrates cognisance of the Irish state’s very poor historical record in relation to the treatment of lone parents and their children and recognises that the current disadvantage experienced by lone parents has been exacerbated by the unjust and unfair measures taken by the state in the past*”, has been ignored in essence by Government. A second report on this cohort<sup>13</sup> was also largely shelved which is disappointing given that lone parent households consistently experience very high levels of both relative and consistent poverty and experience one of the highest levels of unemployment in the EU.

The decision not to implement the *White Paper to End Direct Provision and to Establish a New International Protection Support Service* due to the outbreak of the Ukraine war is not an acceptable rationale for the Community Platform as a reason to halt progress on this important issue. We note that there was no timeline, implementation plan or accountability structure in place before progress was stalled. We recognise the challenges that have arisen in the interim, including the additional pressure put on the international protection system due to the outbreak of the war in Ukraine. However, the Community Platform believes urgent progress is needed on this important issue. A new White Paper must be published and implemented without delay, including a clear timeline, implementation plan and accountability structure.

We note and welcome the fact that accountability will be embedded into the new guide for marginalised communities, and will form part of the new Guidelines from the Department of Expenditure, NDP Delivery and Reform.

<sup>12</sup> [https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint\\_committee\\_on\\_social\\_protection/reports/2017/2017-06-15\\_report-on-the-position-of-lone-parents-in-ireland\\_en.pdf](https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_social_protection/reports/2017/2017-06-15_report-on-the-position-of-lone-parents-in-ireland_en.pdf)

<sup>13</sup> Millar, M and Crosse, R. (2016) Lone Parents and Activation, What Works and Why: A Review of the International Evidence in the Irish Context. The UNESCO Child and Family Research Centre, National University of Ireland, Galway. [https://www.universityofgalway.ie/media/unescochildandfamilyresearchcentre/documentspdf/2016\\_Millar-and-Crosse\\_Lone-Parents-and-Activation-Report\\_digital.pdf](https://www.universityofgalway.ie/media/unescochildandfamilyresearchcentre/documentspdf/2016_Millar-and-Crosse_Lone-Parents-and-Activation-Report_digital.pdf)



**05**

**ARTICLE 2.1  
MAXIMUM  
AVAILABLE  
RESOURCES**

In the Government’s Roadmap for Social Inclusion 2020-2025 the Government committed to reducing the consistent poverty rate to 2% or less by 2025. While we agree with this level of ambition, we are concerned that this repeats the unfulfilled commitment in previous strategies and remains unachieved. In 2022, 5.3% or over 271,000 people were in consistent poverty - an increase from 4% in 2021.<sup>14</sup> In 2022, 13.1% of the population were living below the poverty line, an increase from 11.6% in 2021 and returning to poverty levels in 2020. These were the first increases in 10 years. Some groups in society also experience much higher levels of poverty than others.

The Deprivation Index published in November 2022 showed that the gap between Ireland’s most disadvantaged areas and the national average has increased, and that between Census 2016 and Census 2022 the number of people living in areas classed as very or extremely disadvantaged has increased from 143,506 individuals to 195,992.<sup>15</sup>

With regard to wealth inequality we see that in 2020 the median wealth was €193,100, while the wealth of the poorest 10% of the population was €600 and the wealthiest 10% was €788,400. This is a multiple of 1,314.<sup>16</sup>

## Recommendations on Maximum Available Resources

01

Use all policy levels across Government to tackle the structural causes of poverty, including inequality.

02

Maximise the targeting of available resources in a way that ensures those on the lowest incomes can afford the cost of living.

<sup>14</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2022/>

<sup>15</sup> <https://www.pobal.ie/pobal-hp-deprivation-index/>

<sup>16</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-hfcs/householdfinanceandconsumptionsurvey2020/>

# 06

# ARTICLE 2.2

# NON

# DISCRIMINATION

<b>Socio-economic status as a ground in equality legislation</b>	<b>33</b>
<b>Discrimination against minority groups and hate crime</b>	<b>34</b>
<b>Recommendations on Discrimination</b>	<b>34</b>



Ireland has yet to address the lack of a socio-economic status ground in our equality legislation. It has been included in the overall review of this legislation, yet to be completed. We view it as imperative for the Government to address this gap as a matter of urgency, otherwise Ireland is not covering all aspects of this article.

In relation to older people, we note that Ireland is the fastest ageing country in the EU yet we do not have an independent all-of-Government body to take complaints, advise Government and commission research on this growing cohort of people. We also observe that the Equality Acts permit discrimination against workers aged 65 and older.

### **Socio-economic status as a ground in equality legislation**

Community Platform members are engaged in a campaign by the #Addthe10th alliance<sup>17</sup> and submitted a collective response to the call for submissions on the review of the Equality Acts in 2021.<sup>15</sup> We view the inclusion of this ground as imperative in filling a gap in our legislation whereby those experiencing discrimination because of their disadvantaged socio-economic status are not protected under our current equality legislation.

Since then the only progress has been the publication of a report in June 2023 containing a summary of the submissions to the consultation. In mentioning next steps, the report states that “*All submissions to the Public Consultation on the Review of the Equality Acts will be considered as part of the Review of the Equality Acts. It is hoped that some legislative proposals will be brought forward in 2023, although the nature of these proposals is yet to be determined. As can be seen from the substantial engagement with the public consultation, some of these issues are complex and require not only more research but further consultation with relevant parties.*”<sup>18</sup> It is now early 2024 and despite the urgency of the

<sup>17</sup> <https://www.atdireland.ie/wp/does-it-only-happen-to-me-the-atd-ireland-report-on-socio-economic-discrimination/>

<sup>18</sup> <https://www.gov.ie/pdf/?file=https://assets.gov.ie/263228/432baf5b-81eb-4f52-80fe-2f50f738ec1f.pdf#page=null>

issues raised in the review, there is no clarity on when and how the review process will progress, and Community Platform members are concerned that time is running short to properly address this issue.

### **Discrimination against minority groups and hate crime**

We welcome the publication of the National Action Plan Against Racism in 2023 but view its implementation as essential.

There is significant evidence to indicate that the increased activities of far-right activists are resulting in increased levels of discrimination against some groups in society particularly people from migrant / ethnic minority backgrounds, Black people and people from the LGBTQI+ community. With regard to misogynistic hate crime, we believe this should be addressed through the introduction of new hate crime and incitement to violence legislation, complemented with the introduction of a dedicated Action Plan Against Hate to address hate crime and hate speech against women, including women from minority and marginalised groups.

### **Recommendations on Discrimination**

We believe that our equality legislation can become more effective in tackling structural inequality by:

<p>Strengthening the monitoring of the implementation of Action Plans developed by an organisation or public body and through Equality Reviews.</p>	<b>01</b>
<p>Strengthening the implementation, monitoring and enforcement powers under the Public Sector Equality and Human Rights Duty and role for civil society groups.</p>	<b>02</b>

We propose a number of changes to our equality legislation to make it more effective in protecting people against discrimination:

<b>01</b>	Maximise the targeting of available resources in a way that ensures those on the lowest incomes can afford the cost of living.
<b>02</b>	Add the ground of socio-economic status as a ground, to protect those who experience discrimination on this basis.
<b>03</b>	Enable people who experience discrimination under intersecting grounds to be able to take cases under multiple grounds.
<b>04</b>	Extend the two-month time-limit on taking a case under the Equal Status Act to enable those who experience discrimination to access justice.
<b>05</b>	Completely remove the exemptions for the State under Section 14 of the Equal Status Act
<b>06</b>	Remove cases of discrimination against licenced premises from the District Court to the Work Relations Commission, as with other discrimination cases. This happens due to section 19 of The Intoxicating Liquor Act, 2003.
<b>07</b>	Implement the 2023 National Action Plan Against Racism.
<b>08</b>	Institute a Commissioner for Ageing and Older Persons.
<b>09</b>	Introduce a UN Convention on the Rights of Older Persons.
<b>10</b>	Institute a human rights-based approach to care.

# 07

# ARTICLE 3

# EQUAL RIGHTS

# OF MEN AND

# WOMEN

<b>Equal Rights - The Istanbul Convention</b>	<b>37</b>
<b>Gender pay gap</b>	<b>38</b>
<b>Women's participation in politics</b>	<b>39</b>
<b>Recommendations on Equal Rights of Men and Women</b>	<b>40</b>

## **Equal Rights - The Istanbul Convention**

The Istanbul Convention recognises that women's inequality with men is the root cause of violence against women. Government efforts to address this inequality as a means to prevent violence experienced by women in Ireland lacks urgency and coordination. The *GREVIO Baseline Evaluation Report on Ireland*,<sup>19</sup> published October 2023, highlights numerous areas of improvement needed in policy, legislation, data collection, education, training, supports and funding for victims of domestic violence. These areas all have a direct effect on the inequality and discrimination experienced by women which in turn results in the level of violence we see perpetrated against women. All these recommendations should be addressed and implemented as a matter of urgency to reduce costs to families. The report raised concerns about certain judicial and sentencing practices in cases of violence against women, including the frequent application of lenient sentences and the tendency to rely on suspended or conditional sentences, which indicate that acts of violence against women are considered as offences of lower social danger.

Community Platform members note that outdated and unacceptable provisions of the Irish Constitution have yet to be addressed. March 8th 2024 has been announced as the date for the referendum on Article 41. It is debatable if the proposed wording will deliver on the changes sought in the reports of the Citizens Assembly April 2021 or the Joint Committee on Gender Equality December 2022. Little progress has been made on calls on Ireland to enshrine the principle of equality in its Constitution. The report specifically encouraged Ireland to enshrine the principle of equality in its Constitution.

We also note that the Government's review of equality plans found gaps in implementation and coordination and urge Government to address these deficits in the successor to the Women and Girls National Strategy.<sup>20</sup>

<sup>19</sup> <https://rm.coe.int/grevio-s-baseline-evaluation-report-on-legislative-and-other-measures-/1680ad3feb>

<sup>20</sup> <https://www.gov.ie/en/press-release/d7cbd-minister-ogorman-welcomes-publication-of-evaluation-study-of-processes-implementing-equality-strategies/>

## Gender pay gap

The latest EUROSTAT figures show the latest gender pay gap for Ireland is 11.3% (Gender Equality – Wednesday, 8 Feb 2023 – Parliamentary Questions (33rd Dáil) – Houses of the Oireachtas)<sup>21</sup> - this has serious implications for a woman's lifetime earnings, her life and career decisions, and her ability to live in older years with a decent income.

We are concerned that economically, efforts to address the gender pay gap are inadequate as reporting only applies to a small section of employers (over 250 employees) and there are little or no penalties for non-compliance.

Women continue to bear primary responsibility for unpaid care while workers, predominantly women, across the care sectors, are among the lowest-paid in the economy, a key contributor to the gender pay gap. The absence of affordable childcare is the biggest barrier to women's equal participation in society, and international evidence shows very clearly that a public, not-for-profit, childcare model is the best way to ensure access to affordable, quality childcare for families and decent pay and working conditions for childcare workers.



# 11.3%

Gender pay gap  
in Ireland

<sup>21</sup> <https://www.oireachtas.ie/en/debates/question/2023-02-08/4/>

## Women's participation in politics

The representation of women in public and political life begins with representation in positions of decision-making. Ireland lags far behind other countries when it comes to political representation. As of 2020 Ireland had just 27% women in parliament and 26% in national Government. Women still face numerous barriers to entering the political arena - from financial barriers to internal party administration and sexually motivated online abuse. Quotas have been introduced at a national level but not extended to county or local level. The more women entering politics from a grassroots level, the more women are likely to progress to a national and European level though on-going targeted work is required to ensure that this happens in practice.

There will be local elections in Ireland in 2024. We believe that urgent action is required now to ensure that we have equal numbers of women and men on ballot papers in every local electoral area in the country. There is huge disparity in the representation of women, particularly in rurally based councils. These women often experience the impact of policy making the most, and face additional barriers in achieving full and equal participation in public and political life. Measures must be introduced to adequately resource local councils to develop more family-friendly policies and procedures. This also means providing practical support for councillors with caring responsibilities allowing care costs to be included as an eligible expense.

**27%**

Women in  
Irish parliament

**26%**

Women in  
national Government

## Recommendations on Equal Rights of Men and Women

Amend Ireland's Constitution as it relates to family, care and gender equality, in line with recommendations of the Citizens' Assembly on Gender Equality and the Joint Oireachtas Committee on Gender Equality report.	<b>01</b>
Implement gender quotas at local Government level.	<b>02</b>
Invest in practical measures to make local Government accessible to	<b>03</b>
Deliver legislation and practical measures to ensure the inclusion of marginalised women, including Traveller and Roma women, working class women, disabled women, migrant women, the LGBTQ+ community and women in rural communities in local and national elections.	<b>04</b>
Introduce measures to adequately resource local councils to develop more family-friendly policies and procedures. This also means providing practical support for councillors with caring responsibilities allowing care costs to be included as an eligible expense.	<b>05</b>
Acknowledge the previous injustice of the 'marriage bar' with a once-off, ring-fenced retrospective scheme.	<b>06</b>
Retain the current pension age of 66 years.	<b>07</b>
Ensure the Total Contributions Approach (TCA) is limited to 30 years for the maximum pension.	<b>08</b>
Ensure women born before 1st Sept 1946 can benefit under the Homemakers and Homecaring Periods schemes.	<b>09</b>





**08**

**ARTICLE 6  
RIGHT TO  
WORK**

Despite the existence of a number of targeted strategies such as the *Comprehensive Employment Strategy for People with Disabilities* and the *National Traveller and Roma Inclusion Strategy*, and commitments in broader strategies such as *Pathways to Work* and the *Roadmap for Social Inclusion*, the employment levels of these and other groups experiencing socio economic exclusion in society has not improved.

This is despite record employment levels of an estimated 2,655,900 and employment levels of 74.1% and a low unemployment rate of 4.6%<sup>22</sup>. Employment levels for disabled people is 36.5%, with a disability employment gap of 38.6% in 2020 which is one of the highest in the EU.<sup>23</sup> Irish single parent households have the lowest employment rates (64%) in the EU (74.2%).<sup>24</sup> The EU Fundamental Rights Agency reports that 17% of Traveller women and 13% of Traveller men have paid jobs compared to 68% of Irish women and 80% of men generally. Most only have part-time jobs (58%) and only 38% work full-time. Only 26% have a permanent contract.<sup>25</sup>

Though Ireland has historically high levels of employment, there are groups whose employment rates are considerably lower than the national figure including Travellers and Roma, disabled people, people coming from urban and rural disadvantaged / isolated communities. Outside of the Census figures it can be hard to get granular data that is essential to really plan to address these issues in a holistic and inclusive way. We also observe that Government appears to be reluctant to ensure that employers contribute meaningfully in the creation of an inclusive labour market. While we recognise that there are schemes to encourage employers to recruit disabled people and those who are long-term unemployed, we regret an absence of a whole-of-Government focus on a person's right to work, to access and retain a decent job.

<sup>22</sup> [www.cso.ie/en/releasesandpublications/ep/p-lfs/labourforcesurveyquarter32023/](http://www.cso.ie/en/releasesandpublications/ep/p-lfs/labourforcesurveyquarter32023/)

<sup>23</sup> [https://commission.europa.eu/system/files/2022-06/2022-european-semester-country-report-ireland\\_en.pdf](https://commission.europa.eu/system/files/2022-06/2022-european-semester-country-report-ireland_en.pdf)

<sup>24</sup> *ibid*

<sup>25</sup> [https://fra.europa.eu/sites/default/files/fra\\_uploads/fra-2020-roma-and-travellers-survey-country-sheet-ireland\\_en.pdf](https://fra.europa.eu/sites/default/files/fra_uploads/fra-2020-roma-and-travellers-survey-country-sheet-ireland_en.pdf)

We note the lack of reference to specific supports that many disabled people need to work, such as the Personal Assistance Service (PAS), and the lack of development of a sustainable national system for disabled people to access PAS which continues to impact on those disabled people who wish to work. We are concerned that failure to develop a system for employment of a PAS has resulted in staff effectively having zero-hour contracts, making this career less attractive with the knock-on effect that fewer personal assistants are available which impacts on disabled people who are living independently.

# 2,665,900

Employment levels (estimated)

# 4.6%

Unemployment rate

# 74.1%

Employment rate



**09**

**ARTICLE 7  
RIGHT TO  
JUST AND  
FAVOURABLE  
CONDITIONS  
OF WORK**

While welcoming the implementation of the EU Minimum Wage Directive and the benchmarking of the National Minimum Wage (NMW) at 60% of hourly median wages, Community Platform members believe that a more positive step towards the achievement of a Living Wage would have involved the Minimum Essential Standards of Living Approach.

The benchmarking to 60% of hourly median wages will not result in workers achieving a Living Wage based on the cost of living as calculated by the Living Wage Technical Group, using the Irish reference basket of goods and services methodology, the Minimum Essential Standard of Living. The Living Wage Technical Group calculates that the Living Wage for 2023/2024 should be €14.80 per hour.<sup>26</sup>

The Government's benchmarking proposal involves a period of transition, which will take place over a period up to 2026. This has resulted in the NMW increasing to €12.70 per hour, from 1st January 2024, for those 20 years and over in 2024. This is €2.10 lower than the Living Wage Technical Group's calculation. The Government has called this new process the National Living Wage.<sup>27</sup>

<sup>26</sup> <https://www.livingwage.ie/>

<sup>27</sup> *ibid*

We are also very mindful of the chilling effect for precarious workers in zero-hour contracts with poor working conditions who are fearful of becoming unemployed. Through our engagement with this cohort of workers we understand how out of touch and far removed from the reality of these workers' lives these mechanisms, such as the Workplace Relations Commission, are.

## **Recommendations on the Right to Just and Favourable Conditions of Work**

Benchmark the minimum wage to the Living Wage as calculated by the Living Wage Technical Group, based on the cost of living.

**01**

With regard to the Magdalene Laundries and Mother and Baby Homes processes - identify and quantify the number of victims of institutional abuse committed in Magdalene Laundries, Mother and Baby Homes and County Homes, National Schools, and through the procedure of symphysiotomy, while avoiding unreasonable requirements and time frames; provide victims with the necessary support services and enshrine their rights in law; and facilitate and enable their access to justice.

**02**





# 10 ARTICLE 9 RIGHT TO SOCIAL SECURITY

As a means of addressing the gap between the cost of living and social welfare rates, and to enable people to afford a decent standard of living, many organisations have proposed that welfare rates are benchmarked on an annual basis against a level that is adequate to lift people above the poverty line and provide them with a Minimum Essential Standard of living. This could be achieved through progressive realisation.

### **Recommendations on the Right to Social Security**

**01**

Benchmark welfare rates on an annual basis against a level that is adequate to lift people above the poverty line and provide them with a Minimum Essential Standard of living. This could be achieved through progressive realisation.

# 11

# ARTICLE 10

# PROTECTION

# OF THE FAMILY

# AND CHILDREN

<b>Family Leave</b>	<b>53</b>
<b>Childcare</b>	<b>53</b>
<b>Violence against women and children</b>	<b>53</b>
<b>Non-married families</b>	<b>55</b>
<b>Lone parent families - a very disadvantaged cohort</b>	<b>55</b>
<b>Recommendations on the Protection of the Family and Children</b>	<b>56</b>

## **Family Leave**

Payments for family leave in Ireland are much lower than EU norms and there is a larger gap between the end of paid leave and the start of Early Years services. Payments in most OECD countries offer at least 50% of average earnings, with many offering 100%, while in Ireland less than a third of average earnings are replaced.

## **Childcare**

Lack of affordable childcare is the biggest barrier to women's equal participation in society, and international evidence shows very clearly that a public, not-for-profit, childcare model is the best way to ensure access to affordable, quality childcare for families and decent pay and working conditions for childcare workers.

## **Violence against women and children**

Women enduring domestic violence can find it difficult to access timely and specialist legal advice or legal representation in order to assert their legal rights. There are many different reasons for this including the shortage of expert practitioners with a good understanding on domestic violence issues and the low financial eligibility threshold for legal aid which excludes many women from accessing this critical support.<sup>28</sup> This means that women must sometimes represent themselves and face their abuser directly in court, which is very difficult, or else forgo any assertion of their legal rights. Court proceedings are slow and often entail many appearances, designated assessors' reports used in domestic violence related family law proceedings may not always reflect the reality of the domestic abuse afflicting the woman and her children. We also know that many abusers are very adept at weaponising the legal system in order to further abuse the non-abusive parent, not least by false assertions that their children are being subjected to parental alienation. The lack of affordable housing impacts severely on women who want to

<sup>28</sup> [https://www.nwci.ie/learn/publication/report\\_the\\_intersection\\_of\\_criminal\\_justice\\_family\\_law\\_and\\_law\\_child\\_care\\_r](https://www.nwci.ie/learn/publication/report_the_intersection_of_criminal_justice_family_law_and_law_child_care_r)

move on from refuge accommodation, where there are already insufficient spaces available. This in turn means that those who need refuge space in a crisis often cannot access it. There are few medium or long-term dedicated housing solutions for women and children seeking to rebuild their lives after escaping from domestic violence. We are concerned that Domestic Violence victims are an invisible group both experiencing and at risk of homelessness.

We remain concerned that the system of support for survivors of domestic violence is still quite dependent on volunteers and on yearly funding models which do not facilitate future planning. Though training is available, it needs to be standardised, tailored to each separate role, and accredited so that it is recognized as a serious qualification which reflects the intensive, specialist nature of the work.

### **Non-married families**

There are anomalies in the Irish legal system which discriminate against non-married households. We know that unmarried parents do not have the same legal rights as marital families and the protection of the family in the Constitution does not extend to unmarried families. Also, the Widow or Widowers Pension is not available to non-marital households no matter how long they have co-habited, yet for every other benefit the family is assessed the same as the marital family.

### **Lone parent families a very disadvantaged cohort**

Lone parent families are a very disadvantaged group in Irish society. A report by the Oireachtas Joint Committee on Social Protection notes that *“It is important that policy developed in this area demonstrate cognisance of the Irish state’s very poor historical record in relation to the treatment of lone parents and their children and recognise that the current disadvantage experienced by lone parents has been exacerbated by the unjust and unfair measures taken by the state in the past.”*

A second report on this cohort<sup>29</sup> was also largely shelved. Community Platform members are very disappointed in this lack of implementation given that Lone Parent households consistently experience very high levels of both relative and consistent poverty and continues to have one of the highest levels of unemployment in the EU.

In relation to the Commission of Investigation into Mother and Baby Homes, we note that the phone counselling is of a more general nature as opposed to being trauma-informed. We are aware that the information collected by this commission was anonymised and therefore the police were unable to use this to pursue justice for victims of sexual violence in these institutions.

<sup>29</sup> Millar, M and Crosse, R. (2016) Lone Parents and Activation, What Works and Why: A Review of the International Evidence in the Irish Context. The UNESCO Child and Family Research Centre, National University of Ireland, Galway. [https://www.universityofgalway.ie/media/unescouchildandfamilyresearchcentre/documentspdf/2016\\_Millar-and-Crosse\\_lone-Parents-and-Activation-Report\\_digital.pdf](https://www.universityofgalway.ie/media/unescouchildandfamilyresearchcentre/documentspdf/2016_Millar-and-Crosse_lone-Parents-and-Activation-Report_digital.pdf)

## Recommendations on the Protection of the Family and Children

Family leave payments must be increased and linked to earnings to keep up with inflation but also to begin the process of bringing payments more in line with EU norms.	<b>01</b>
Government must deliver a fully public, not for profit, universal childcare system with a significant increase in investment in the interim to reduce costs for families.	<b>02</b>
Amend Ireland's Constitution as it relates to family, care and gender equality, in line with recommendations of the Citizens' Assembly on Gender Equality and the Joint Oireachtas Committee on Gender Equality report.	<b>03</b>
Implement in full the Council of Europe's GREVIO's (Baseline) Evaluation Report on legislative and other measures giving effect to the provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention).	<b>04</b>
Resource domestic violence support services adequately.	<b>05</b>
Adopt a co-production approach to the development of a simple mechanism through which the experiences of survivors of domestic violence and those working with them in dedicated support services can be fed directly into policy-making at the Department of Justice and elsewhere.	<b>06</b>
Address the root causes of domestic violence through education and awareness-raising.	<b>07</b>
Amend the constitution to extend rights and protections to other families than those based on marriage.	<b>08</b>
Examine and address the barriers which lone parents face in accessing services, returning to work and education by providing quality affordable childcare.	<b>09</b>
Implement measures to allow the police to access the Archives of the Final Report of the Commission of Investigation into Mother and Baby Homes and other such commissions so that the state can exercise, where possible, its due diligence obligation to investigate, punish and provide reparation for acts of violence against women.	<b>10</b>





# 12

# ARTICLE 11

# RIGHT TO

# AN ADEQUATE

# STANDARD

# OF LIVING

<b>Inadequate social welfare rates</b>	<b>62</b>
<b>Government has failed to define income adequacy</b>	<b>63</b>
<b>Right to an adequate standard of living</b>	<b>63</b>
<b>Deliberate decision-making by Government not to protect an adequate standard of living</b>	<b>64</b>
<b>Structured regression in access to core health and social care services</b>	<b>64</b>
<b>Recommendations on the Right to an Adequate Standard of Living</b>	<b>65</b>

Many people in Ireland are increasingly facing challenges in making ends meet and affording basic essentials such as food, energy, housing and other daily costs. While this situation has been exacerbated by the COVID-19 crisis and in particular the current cost of living crisis, this has been a reality for many people for an extended period. We are very mindful of the growing dependence on food banks and charities by people unable to afford basic essentials.

Over 906,000 people, or 17.7% of the population, experienced enforced deprivation in 2022. In 2022 half of households had some difficulty making ends meet, with 5.9% experiencing great difficulty. This was up from 42% and 5.3% respectively in 2021.<sup>30</sup> The experience of enforced deprivation differed across society with those living in one-adult households with children under 18 (43.5%); unemployed (48.6%); unable to work due to long-standing health problems (44.3%); and living in rented or rent-free accommodation (35.6%). The CSO Survey of Income and Living Conditions that captures enforced deprivation does not capture the experience of some groups in society such as Traveller and Roma, disabled people, those who are homeless etc. EAPN Ireland has published a report *'More than a Temporary Crisis'*:<sup>31</sup> This report highlights the issues facing both those needing support with meeting their basic needs as well as the organisations providing the supports and makes a range of proposals to address them.

**906,000+**

People experienced enforced deprivation in 2022

<sup>30</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-silced/>

<sup>31</sup> [surveyonincomeandlivingconditionssilcenforceddeprivation2022/](https://www.eapn.ie/sites/default/files/2022-12/surveyonincomeandlivingconditionssilcenforceddeprivation2022/)

The inability to afford basic necessities, therefore depending on provision from charities and community organisations, is a sign of deep and intersectional poverty, relevant to and experienced by a diverse number of marginalised groups in Irish society. The fulfilment of basic needs is fundamental to human dignity, human rights, and social and economic equality. The report found that:

- Structural causes underpin the increasing numbers of people now seeking support with basic necessities
- Providing support with basic necessities fundamentally changes the work of the Community and Voluntary sector
- Poverty is increasingly complex with specific groups more likely to present for support, i.e., disabled people, migrants, Travellers, the unemployed, single parents and older people

The St Vincent de Paul Society, the largest charity of social concern in Ireland, found that in 2022, 1 in 3 of the people it assisted reported that their income had reduced.<sup>32</sup> Also in 2022 research conducted by Barnardos, Aldi and Amárach found that food insecurity was on the rise and their study showed that 1 in 3 people were spending between 21% and 50% of their income on food, while 43% had reduced their spending in other areas to afford food.<sup>33</sup> Research participants in the EAPN *More than a Temporary Crisis*: study reported how the relentless effort to make inadequate incomes stretch to meet household needs had impacted upon them. They cited a sense of poorer wellbeing, with increased stress and a loss of dignity.

We regret that some of the most costly Government measures to address the current cost of living have been untargeted, in particular the Electricity Credit. The European Commission's 2023 Country Report for Ireland noted this failure to allocate available resources at those with the

<sup>32</sup> PowerPoint Presentation (svp.ie)

<sup>33</sup> Amárach Research. (2022). Food Poverty: The Impact on Vulnerable Children and Families. <https://knowledge.barnardos.ie/handle/20.500.13085/886>

lowest incomes instead resorting to untargeted energy credits. While the Minimum Essential Standard of Living Budget 2023 Impact Briefing said: *“It is regrettable that a more targeted approach focusing a greater share of available resources on low-income households was not taken”*.<sup>34</sup>

The incomes of older people are impacted negatively by inflation which is projected to reach a cumulative 19.4% in the period 2020 to 2025. It has been calculated that in 2024 the weekly state pension will have less spending power than it did in 2020. In 2023 older people living alone, living only on the state pension were unable to afford a Minimum Essential Standard of Living (MESL).<sup>35</sup>

The accommodation crisis in the international protection system is a major concern for Community Platform members. Notwithstanding the overall supply and cost challenges in the housing market and the geopolitical unrest which has triggered an increase in people needing to be housed under the programme, the current situation where people are not being housed at all and left to fend for themselves on the street with a payment is unacceptable.<sup>36</sup> This represents a failure of the part of Government to both protect the rights of international protection applicants and to plan effectively for their long-term accommodation needs. A key concern is the inadequacy of the Daily Expenses Allowance for people in Direct Provision, particularly for families and children.

Community Platform members regret the fact that 50% of disabled people who currently apply for Disability Allowance (DA) are refused yet 70% of these cases are overturned on appeal. Many disabled people often lack supports to challenge the bureaucratic system for much needed social security.

<sup>34</sup> [https://www.budgeting.ie/download/pdf/budget\\_2023\\_-\\_mesl\\_impact\\_briefing\\_-\\_revised.pdf](https://www.budgeting.ie/download/pdf/budget_2023_-_mesl_impact_briefing_-_revised.pdf)

<sup>35</sup> [https://www.ageaction.ie/sites/default/files/published\\_age\\_action\\_spotlight\\_on\\_income\\_in\\_older\\_age.pdf](https://www.ageaction.ie/sites/default/files/published_age_action_spotlight_on_income_in_older_age.pdf)

<sup>36</sup> In April 2023, the High Court ruled that the failure to provide adequate reception conditions to an applicant was an unlawful breach of Article 1 of the EU Charter of Fundamental Rights, the right to human dignity.

## **Inadequate social welfare rates**

Social Welfare levels are inadequate to lift people above the poverty line or provide them with a Minimum Essential Standard of Living (MESL).<sup>37</sup> In 2022 the working age social welfare rates were €220 per week while the 60% poverty line was €301.91 per week and the cost of a MESL for a single working age person in an urban setting was €276.12. Due to different costs the cost of a MESL for a single working age adult in a rural area is €327.10.

In addition, the Community Platform notes that Irish social welfare rates are not indexed to inflation. Despite a commitment in the Programme for Government to protect the value of core weekly social welfare payments we know that real value of these payments were not protected in Budgets 2023 and 2024 despite nominal increases.

Amongst the groups who feature regularly in poverty figures are people who are unemployed and people unable to work due to a long-standing health issue (who may or may not be included in the disability stats). Activating the former has been a key response for this State, but addressing the issue of income adequacy within social welfare payments is also critical, to a level that lifts them above the poverty line while supporting them to have a minimum essential standard of living. This can be achieved while also working across Government and society to realise a truly inclusive labour market, one where people can access a decent job.

<sup>37</sup> The MESL reference budget methodology in Ireland is based on cost of goods and services and calculate what it costs to provide various household types a Minimum Essential Standard of Living. <https://www.budgeting.ie/>

### **Government has failed to define income adequacy**

While Government uses the term income adequacy it has not as yet defined what would constitute income adequacy. There has been no effort to date by Government to clearly articulate what exact steps and measures are required to achieve income adequacy. Through our engagement in the yearly budgetary process we can see that the Government's approach to budgets does not include the core goal of meeting income adequacy. We cannot discern deliberate strategic measures which would deliver income adequacy through a series of explicit actions.

### **Right to an adequate standard of living**

As a means of addressing the gap between the cost of living and social welfare rates, and enable people to afford a decent standard of living, many organisations have proposed that welfare rates are benchmarked on an annual basis against a level that is adequate to lift people above the poverty line and provide them with a Minimum Essential Standard of living. This could be achieved through progressive realisation.

Following on from the process to benchmark state pensions the *Roadmap for Social Inclusion 2020-2025*<sup>38</sup> commits to considering and preparing a report for Government on the potential application of the benchmarking approach to other welfare payments.

<sup>38</sup> <https://www.gov.ie/pdf/?file=https://assets.gov.ie/259391/5bcb78ff-a5fd-45db-9e6a-f187980f603c.pdf#page=null>

### **Deliberate decision-making by Government not to protect an adequate standard of living**

Community Platform members note the continued use of conditionality in order to access various social welfare payments which restrict people from gaining access or maintaining a payment if their circumstances change and lifts them above particular thresholds.

We regret that currently there is no legal guarantee that the state pension will continue to maintain its spending power. This occurs against a backdrop of increasing inflation which has cut the spending power of all welfare payments in real terms, despite yearly nominal rate increases.

### **Structured regression in access to core health and social care services**

Our members are very aware that the Irish state had engaged in structured retrogression by deliberately choosing not to adjust the income thresholds for the Medical Card scheme in recent years, in a period when cumulative inflation has reached 20%. This decision has resulted in a large cohort of people being structurally excluded from this critical scheme which provides free GP care and range of supports to assist them with the cost of health care, notably reduced costs for prescriptions. This is particularly disappointing as the medical card scheme is a gateway scheme to other supports for low-income households.



**Recommendations on the Right to an Adequate Standard of Living and older people to achieve an adequate standard of living.**

<b>01</b>	Benchmark social welfare rates on an annual basis against a level that is adequate to lift people above the poverty line and provide them with a Minimum Essential Standard of living. This could be achieved through progressive realisation.
<b>02</b>	Define and agree a common definition of income adequacy so that the figure and definition can be commonly used by all relevant stakeholders effectively and transparently in all measures, research, policy instruments to achieve income adequacy.
<b>03</b>	Provide an Energy Guarantee for Older Persons payment.
<b>04</b>	Make concrete steps to move towards a Universal State Pension system for all, benchmarked to maintain the relative value of the State pension compared to earnings growth and price inflation
<b>05</b>	Ensure the Total Contributions Approach (TCA) is limited to 30 years for the maximum pension. This must be benchmarked to maintain the relative value of the State pension compared to earnings growth and price inflation. Achieve some measure of income adequacy by benchmarking the state pension to at least equal to 34% of total average earnings.
<b>06</b>	Abolish mandatory retirement.
<b>07</b>	Fully resource the National Disability Implementation Plan and provide sufficient funding for all areas of disability housing policy to support disabled people.

# 13

# ARTICLE 12

# RIGHT TO

# PHYSICAL

# AND MENTAL

# HEALTH

<b>Sláintecare – the reform programme to deliver universal access to health care</b>	<b>67</b>
<b>Health inequalities</b>	<b>68</b>
<b>Transgender Healthcare</b>	<b>69</b>
<b>Abortion care</b>	<b>70</b>
<b>Recommendations on the Right to Physical and Mental Health</b>	<b>70</b>

Ireland remains an outlier in Europe in not providing universal access to primary care. Health inequalities have a very steep social gradient with some groups experiencing very poor health outcomes, mortality rates and levels of chronic conditions. See the EAPN Ireland report<sup>39</sup> which was instrumental in the Government establishing the new Sláintecare Healthy Communities Programme in 2021.

We note that the European Commission Irish Country Report 2023 under the Semester Programme, continues to cite health as an overarching challenge not sufficiently covered within its Resilience and Recovery Plan.<sup>40</sup>

### **Sláintecare – the reform programme to deliver universal access to health care**

The full and speedy implementation of the Sláintecare reforms is critical in the creation of a more equitable universal public healthcare system, based on need rather than ability to pay. However, the pace of reform has slowed and much needs to be done to address the structural nature of health inequalities, in terms of access and outcomes. Both the pandemic and current geopolitical unrest have created pressure on health budgets. The importance of agile leadership in optimising budgetary resources for Sláintecare will be more critical than ever.

We believe that reforms need to include a greater focus on addressing health inequality, both in terms of access and outcomes, and addressing both physical and mental health and the social determinants of health.

<sup>39</sup> <https://www.eapn.ie/wp-content/uploads/2020/09/Giving-Health-Inequality-a-Voice-Final.pdf> -

<sup>40</sup> [https://economy-finance.ec.europa.eu/system/files/2023-05/IE\\_SWD\\_2023\\_607\\_en.pdf](https://economy-finance.ec.europa.eu/system/files/2023-05/IE_SWD_2023_607_en.pdf)

## Health inequalities

Health inequalities are unfair, avoidable and clearly related to socioeconomic status in Ireland, impacting marginalised groups and communities in particular. Inequitable access to the social determinants of health results in some groups of people leading less healthy and shorter lives.

We note that of the 906,000 people (17.7% of the Irish population) who experienced enforced deprivation in 2022, 44.3% were unable to work due to long-standing health problems (44.3%).<sup>41</sup> These are people who do not make up the almost 50% of the Irish population who bypass the under-resourced public health system and get fast-tracked access to diagnosis and treatment via private health insurance.

The latest data on the difference in life expectancy between the most and least affluent areas is from 2016/17 and clearly shows the health outcomes related to socioeconomic status in Ireland. When data from the 2016 Census was matched to death certificate data the life expectancy at birth for males from the most deprived areas was five years lower than that of men living in the most affluent areas, 79.4 years versus 84.4 years, while for women the difference was 4.5 years, at 87.7 years versus 84.4.<sup>42</sup>

A more recent ESRI report, from 2022, confirms the depth of inequalities particularly among marginalised and hard to reach cohorts.<sup>43</sup> That report demonstrates and confirms, through its analysis of socioeconomic status (SES) inequalities from various data sources, that less advantaged socioeconomic groups continue to have a higher age-standardised mortality rate.

We welcome the innovative new Healthy Communities Programme, under Sláintecare Reform Programme 2, which targets reducing health inequalities in vulnerable cohorts in nineteen of the most disadvantaged

<sup>41</sup> [www.cso.ie/en/releasesandpublications/ep/p-silced/surveyonincomeandlivingconditionssilcenforceddeprivation2022/](http://www.cso.ie/en/releasesandpublications/ep/p-silced/surveyonincomeandlivingconditionssilcenforceddeprivation2022/)

<sup>42</sup> CSO (2019d). Mortality Differentials in Ireland 2016-2017. CSO, Dublin.

<sup>43</sup> Economic, Social and Research Institute. (2022) Unequal Chances? Inequalities in mortality in Ireland. [online]

sites in Ireland, acknowledging that this is the first time Local Authorities have engaged in the drive to tackle health inequalities. However, we know that addressing the social determinants of health is the fundamental challenge that must be tackled by all arms of Government if the two-tier health system is to be dismantled and replaced by an adequately resourced public health system based on equity, transparency and supported by real-time data and appropriate structures. Niche place-based initiatives, leveraging Local Authority resources and focused on specific marginalised groups are welcome but cannot address embedded health inequalities.

Regarding disabled people, we are mindful of the lack of specific references to the systemic barriers experienced by disabled women specifically in accessing healthcare supports, including for intending disabled parents.

### **Transgender Healthcare**

The current system for transgender healthcare in Ireland has been identified as the worst among all EU member states, according to a report published in 2022 by Transgender Europe (TGEU). An Irish Times article on this is available.<sup>43</sup>

*The Irish Programme for Government commits to “Create and implement a general health policy for Trans people, based on a best-practice model for care, in line with the World Professional Association of Transgender Healthcare (WPATH) and deliver a framework for the development of National Gender Clinics and Multidisciplinary Teams for children and adults.”*

This has not happened, and in October 2023 19 Irish and international organisations wrote to the HSE to call for a model of transgender healthcare in Ireland that is in line with international human rights standards.<sup>44</sup>

<sup>43</sup> [www.irishtimes.com/health/2022/10/31/ireland-ranked-worst-for-transgender-healthcare-in-eu/](http://www.irishtimes.com/health/2022/10/31/ireland-ranked-worst-for-transgender-healthcare-in-eu/)

<sup>44</sup> [www.transhealthcare.ie/post/open-letter-to-the-irish-hse-transgender-services](http://www.transhealthcare.ie/post/open-letter-to-the-irish-hse-transgender-services)

## Abortion care

Despite abortion provision being in operation in Ireland since 2019, there are significant legal barriers for women in accessing abortion care across the country. At least 860 women travelled from Ireland to the UK to access abortion since the Eighth Amendment was repealed. The independent review on the State's abortion laws published earlier this year recommended 60 operational changes to enable access to care at home. However, there is significant uncertainty on the political commitment to ensure implementation of the review in full. The review shed light on critical shortcomings in current abortion provision, particularly in terms of the postcode lottery for services; the absence of abortion services in eight of our 19 maternity units, the impact of the mandatory three-day wait; the strict 12-week gestational limit, the continuing criminalisation of abortion, and the need to balance conscientious objection with the right to access reproductive healthcare. It is critical that the State progresses the development of abortion policy, in line with independent expert analysis including from the WHO, as a fundamental aspect of reproductive healthcare.

## Recommendations on the Right to Physical and Mental Health

Incorporate a human-rights based approach to care.	<b>01</b>
Prioritise, resource and deliver the Sláintecare reforms in full to ensure the creation of a more equitable universal public healthcare system, based on need rather than ability to pay.	<b>02</b>
Prioritise addressing health inequalities under Reform Programme 2 of Sláintecare to improve health status of both physical and mental health of marginalised groups, those who are excluded from access to primary care and who cannot afford the cost of care	<b>03</b>
Resource and prioritise the actions in the de Buitléir report to achieve the transition from private provision in public hospitals.	<b>04</b>

<b>05</b>	Develop a health inequalities database to measure health inequalities, initially within the nineteen Sláintecare Healthy Communities Programme areas. This would create a baseline which would capture both the place-based reality of health inequalities in the programme and all of the interventions being delivered which address the Social Determinants of Health.
<b>06</b>	Develop a framework (to use within the health inequalities database) using appropriate equity stratifiers (using the PROGRESS-PLUS tool), for use by all stakeholders - HSE, HIQA, academics, all agencies and across relevant Government services, departments and agencies.
<b>07</b>	Implement and resource the National Traveller Health Action Plan.
<b>08</b>	Continue to support and further develop both mainstream and special measures to address Traveller and Roma health inequalities, including expansion of Traveller Primary Health Care Projects.
<b>09</b>	Invest in mental health so that all women and girls have access to gender-sensitive mental health services, including the establishment of a Mother and Baby Unit.
<b>10</b>	Extend the provision of free, safe and suitable period products to all public buildings.
<b>11</b>	Expand the Specialist Menopause Clinic network.
<b>12</b>	Allocate ring-fenced funding to develop the Assisted Human Reproduction Regulatory Authority, and expand access to public tertiary infertility services, including IVF.
<b>13</b>	Implement the O'Shea report in full to remove all barriers to women seeking abortion care including the decriminalisation of abortion after 12 weeks; the removal of the mandatory three-day wait; and addressing geographical gaps in the provision of abortion care across the country.
<b>14</b>	Resource the delivery of a Transgender Model of Care and Action Plan.

# 14

# ARTICLE 13

# RIGHT TO

# EDUCATION

<b>Poor implementation of the Adult Literacy for Life strategy</b>	<b>73</b>
<b>No progress on the Plain Language Bill</b>	<b>74</b>
<b>Government provision of non-disaggregated education data to the Committee on ESCR</b>	<b>74</b>
<b>Digital divide in provision of public services</b>	<b>74</b>
<b>Emphasis on labour activation skills</b>	<b>75</b>
<b>Sensitive engagement critical in Further Education, Training and Community Education</b>	<b>75</b>
<b>Recommendations on the Right to Education</b>	<b>76</b>



The most recent adult literacy survey (CSO 2013) showed that one in six (18%) adults in Ireland (aged 16 to 65) struggled with reading and understanding everyday text, for example, reading a bus timetable or understanding medicine instructions.

It also found that one in four adults (25%) has difficulties using maths in everyday life. For example, basic addition, working out a bill or calculating percentages, while about 2 in 5 (42%) adults struggle with basic digital tasks. For example, they find looking up a website or sending an email difficult. Community Platform members acknowledge that the majority of people who have digital literacy needs also have underlying literacy issues. We do however welcome the Customer Communications Toolkit for the Public Service which was launched in March 2023 and provides invaluable guidance for designing and delivering accessible public services.

### **Poor implementation of the Adult Literacy for Life strategy**

The Adult Literacy for Life (ALL) strategy commits Government departments to a whole-of-Government approach to creating “an Ireland where every adult has the necessary literacy, numeracy and digital literacy to fully engage in society and realise their potential” (p10). However, implementation is slow and under-resourced. There is no clear or agreed implementation plan or monitoring and evaluation framework two years into the ten-year strategy. This creates tremendous uncertainty for literacy advocates and practitioners such as the National Adult Literacy Agency (NALA) to deliver services in a fragmented rather than strategic and systematic way.

**25%**

of adults have difficulties using maths in everyday life



2 in 5 adults struggle with basic digital tasks

### **No progress on the Plain Language Bill**

We note that the Plain Language Bill which was introduced in 2019 has stalled since the 2020 general election, despite having all-party support at the time, and despite the new Programme for Government containing a commitment to “*introduce a plain language requirement for all public service communication, so that people can understand information the first time they read or hear it*”. Community Platform members understand that this plain language requirement is essential to ensure that public services are accessible to and meet the needs of people with unmet literacy needs.

### **Government provision of non-disaggregated education data to the Committee on ESCR**

We are disappointed to note that the education statistics provided by the Government in response to the UN CESCR are not disaggregated and therefore mask the unequal outcomes of various groups, including Travellers, disabled students, and students from lower socio-economic status. To give just one example: 61% of 15-29 year-olds with no formal education, or primary education only, are male (Census 2022) and almost twice as many boys (15%) as girls (8%) are below a functional level (Level 2) in reading (PISA 2022). There are also differences in educational attainment by county (Census 2022).

### **Digital divide in provision of public services**

We understand that digitalisation and other reforms of public services can improve efficiency, but they can also further exclude people with literacy needs, who may already struggle with the practical challenges of engaging with public services and the associated stigma. “Digital first” must never be allowed to become “digital only.”

### **Emphasis on labour activation skills**

Community Platform members note the increased polarization and exclusion which is being amplified by disinformation and emphasis on labour activation skills development. Development of skills at QQI Levels 1-3 is not prioritised in national strategy, which is more concerned with advanced skills for economic reasons. This goes against the UN's principle of "furthest behind first" (UN SDGs). It is not a human rights-based approach.

### **Sensitive engagement critical in Further Education, Training and Community Education**

We know that access to Further Education and Training and community education can be important access points for people whose experience of the formal education system has not been positive. A number of challenges can arise for this cohort including the fact that employers do not always value alternative education and training routes, good data with which to assess progress can be hard to access and how this data is collected can create difficulties for some participants. For example, someone who is returning to education and or a learning opportunity can be very wary and sensitive about being asked questions with an equality / inclusion angle, with reports of people not engaging because they do not trust how this data will be used. Yet without the collection of this data it can be hard to ascertain who is accessing what provision and to what end. Given the clear links between educational and employment status it is important to understand these dynamics and address them appropriately to ensure people can fully enjoy their social and economic rights.

## Recommendations on the Right to Education

Prioritise and adequately resource the implementation of the Adult Literacy for Life Strategy.	01
Deliver a Plain Language Act as committed to in the Programme for Government.	02
Train staff who design and provide public services in literacy awareness and the sensitivity, discretion and legal basis required in the collection of personal data.	03
Target groups with the lowest school retention and educational attainment rates and focus on the development of literacy for this cohort.	04
Address literacy needs at all ages by improving collaboration between the Department of Education and the Department of Further and Higher Education, Research, Innovation and Science.	05
Commit to ensuring that straightforward, accessible and effective public services will continue to be provided by phone and in person, by staff who are trained in literacy awareness.	06
Develop and maintain a clear communications strategy on the importance of good data in the design, delivery and evaluation of public and community-based services; ensure that frontline staff have the supports they require to explain to potential learners how their data will be kept and used to ensure that they over time they can fully access their social and economic rights.	07



# 15

## ARTICLE 20

### PROHIBITION OF INCITEMENT TO HATRED

#### Recommendation on Prohibition of Incitement to Hatred

Ensure implementation of the National Action Plan against Racism and undertake complementary special measures to include anti-racism training for criminal justice professionals, a public awareness campaign, ethnically disaggregated data on reported hate incidents and annual targets to reduce the numbers of hate crimes are implemented in practice.

# 16

## ARTICLE 24

### RIGHTS OF THE CHILD

#### Recommendations on the Rights of the Child

Set clear and time bound targets specific to poverty reduction among Traveller and Roma children in both targeted policy measures (National Traveller Roma Inclusion Strategy) and mainstream policy measures.

Ensure that all children residing in the State, including Roma children, can access Child Benefit payments regardless of the legal or administrative status of their parents.

# 17

## ARTICLE 26

### RIGHT TO EQUALITY BEFORE THE LAW

#### Recommendations on the Right to Equality Before the Law

Ensure that the delayed development of the next iteration of the National Traveller Roma Inclusion Strategy (NTRIS) is promptly concluded and ensure it has an outcomes focussed approach, a robust implementation and monitoring plan with clear targets, indicators, timeframes and budget lines with actions being resourced and implemented by all relevant statutory agencies.

# 18

## ARTICLE 27

### ETHNIC AND LINGUISTIC MINORITIES

#### Recommendations on Ethnic and Linguistic Minorities

Implement all recommendations issued by the independent Expert Group on Traveller Accommodation with a time lined implementation plan, tangible targets, corresponding accountability measures and budget.

# 19

# APPENDIX 1

# SUGGESTIONS

# FOR QUESTIONS

# TO THE IRISH

# GOVERNMENT

# IMPLEMENTATION



## Questions on Consultation and Collaboration

1. Can Government demonstrate that they value co-design and deliberative processes with Civil Society?
2. Has Government shared its good practice, either inter or intra departmentally, in collaborating, engaging and consulting with end users, as recommended in the OECD report?
3. What is the state's plan to learn from the implementation deficits listed in the Centre for Effective Services report?
4. Can the state confirm that all Departments who consult and engage with CSOs demonstrate that they have taken on board the learning from the Centre for Effective Services research and have established appropriate processes and mechanisms to maximise authentic engagement? and that these mechanisms will be constantly monitored and modified to reflect the dynamic nature of implementation?
5. How does the state intend to ensure that the positive examples of collaboration such as the Zero Tolerance Strategy are replicated in other strategy consultations?
6. How does the state intend to guarantee that the newly launched agency Cuan, the Domestic, Sexual and Gender Based Violence Agency, will collaborate authentically with Civil Society and will have a strong survivor centred engagement?
7. Can the Government explain why it has no deliberate/deliberative process to engage with older people given that Ireland is now the fastest ageing country in the EU?
8. What steps is the Government taking to ensure that those who are not using or have access to ICT or who have only basic digital skills can fully participate in all of its consultations and engagement processes?<sup>45</sup>
9. Can the Government guarantee that it will improve the Gov.ie website to facilitate easier access by the public as it is currently very inaccessible, is difficult to navigate, does not have links to strategies and users cannot follow track progress on strategy development or implementation?

<sup>45</sup> We note that Government has established a structure at Local Authority level, the Older Person's Councils, through which older people have an access point to local Government policies and services for planning, community services.

## Questions on Implementation

1. Does Government accept that there has been a failure to properly evaluate policy implementation with the subsequent problem of lack of accountability?
2. What specific steps has the Government taken to date to operationalise all the recommendations of the CES report *Realising the promise of national equality policy: An evaluation of the processes of implementation of three national equality strategies*?
3. What specific steps has the Government taken to deliver on recommendation 4 of the CES report “to ensure that resources should be allocated to support the capacity of seldom heard and marginalised groups to participate fully in the development, implementation, monitoring and evaluation of national equality strategies?
4. What specific plans, actions and measures has the Government taken to progress achieving recommendation 5 of the CES report that Civil Society representatives should have a more formal and influential role in strategy implementation and monitoring, moving towards more collaborative arrangements or co-ownership of strategies?
5. What plans has the Government to dismantle the highly centralised and top-heavy model which results in weak infrastructure locally to support effective implementation of strategies?

## Questions on Data

1. Is Government willing to significantly invest in its data infrastructure in terms of national statistics and administrative data to provide more real time data to allow intersectional analysis?
2. What is the Government's plan to maximise use of existing data to better understand the needs of the population and interrogate the data they currently have at its disposal
3. Will Government expand the scope and size of the SILC survey so that it can include marginalised and minority vulnerable groups?
4. Will Government invest in increasing the use of qualitative data to capture the lived experience of minority groups and to value qualitative data in informing policy design?
5. Will the Government commit to improving the skill sets of staff across all Departments to ensure that there are adequate levels of skilled staff to design surveys and questionnaires?
6. Why don't Government Departments use SWITCH in the same way as the ESRI to take into account the real effect of inflation and wages?
7. Will the Government commit to resourcing CSOs with appropriately trained staff to respond to Government data requests and consultations thus ensuring that these organisations can focus on their core work?
8. Can Government confirm that it has the necessary data to be able to meet the needs of disabled people over the next twenty to thirty years?
9. Why, despite strong data on poorer outcomes for Travellers across a range of key areas, have there not been improvements for this group in the areas of health, education, employment and housing?

## Question on Accountability

1. How can Government justify going ahead with policy decisions which are not supported by good practice and evidence provided by Civil Society, academia or other data sources?

## Questions on Discrimination - Article 2.1

1. What is the Government's timeline for introducing legislative proposals linked to the review of equality legislation, including on introducing a ground of socio-economic discrimination
2. Will the State commit to introducing an Action Plan Against Hate to implement and complement new legislation, aimed at addressing the roots of hate through education, training and awareness raising?
3. Will such a plan have targeted actions to address hate crime and hate speech against women, including women from other protected groups such as Roma, Travellers, LGBTI community and disabled women?
4. In the context of the introduction of new hate crime and incitement to violence or hatred, legislation which identifies "gender" as a protected ground, how does the State plan on countering and preventing misogynistic hate crime?

## Questions on Gender Equality -Article 3

1. What is the State's timeline for publication of a new National Strategy for Women and Girls?
2. What steps will be taken in the development of the new Strategy, having particular regard to engagement and consultation with key stakeholders and the development of clear actions, indicators and timelines?
3. When will the State complete a full evaluation of the progress made on each of the actions committed to under the current Strategy, building on the independent evaluation of implementation processes published in July 2023?
4. What action is being taken by the State to address the ongoing gender pay gap?
5. What is the current status of the Irish Constitution as it relates to family, care and gender equality?
6. What is the State's timeframe for the establishment of a Commission of Care? What is the proposed scope of the new Commission?
7. Are the targets for gender quotas in the Irish electoral system introduced in the Electoral (Amendment) (Political Funding) Act 2012 being met? (These targets shifted from 30% to 40% in 2023)
8. What measures are being implemented to increase the numbers of women in local and national politics in every community?
9. What action is being taken to introduce maternity leave for members of the Irish Parliament and the allowance of childcare costs as an expenditure category for local councillors?
10. What funding is in place for local and regional women's caucuses?
11. What measures has the State implemented to ensure this funding for local and regional women's causes is sustainable and secure?
12. Will the State commit to the allocation of funding and completion of a comprehensive gender and equality audit of all local, rural and community decision making structures?
13. Following the austerity cuts and their significant impact on women's groups, what steps are being taken by the State to ensure that such organisations are receiving appropriate funding from the State, including the provision of secure, multi-annual funding arrangements?

## Question on the Right to Work – Article 6

1. Can the Government outline the effectiveness of its strategies on supporting groups such as disabled people, lone parents, Travellers and Roma into sustainable employment and describe the measures that have been taken to address shortfalls in these strategies?
2. Can the Government demonstrate that it is dismantling the barriers that lone parents face in returning to work?

## Questions on the Right to Just and Favourable Conditions of Work – Article 7

1. How does the Government plan to ensure that its new mechanism for setting the National Minimum Wage at 60% of the hourly median wage will ensure workers have an actual living wage that enables them to meet the cost of living?
2. Does the Government believe that the current mechanisms are appropriate and able to adequately protect vulnerable workers' rights?
3. What is the Government doing to improve working conditions for women, particularly in the care and community sectors?
4. What steps is the Government taking to address the crisis of recruitment and retention in the community and voluntary sector where jobs continue to be insecure, have poorer pay and conditions than equivalent ones in the public and private sectors?
5. What steps has the State taken to improve working conditions for women and enhance family leave entitlements - with particular reference to piloting a participation for unpaid care - and resource a time use survey to gather updated data on time spent on unpaid work; funding a pilot of the four-day week model in the public sector; increasing family leave benefits and examining the implementation of a percentage-of-earnings model of leave/benefit?

## Questions on Trade Union Rights – Article 8

1. What plans does the State have to increase trade union membership so that workers can engage in collective bargaining on an equal footing with organised employer representatives and bodies?
2. What plans does the Government have to legislate for collective bargaining rights of workers?

## Questions on the Right to Social Security – Article 9

1. What specific steps are being taken to establish the Minimum Essential Standard of Living as the benchmark for social protection payments?
2. What action is the State taking to reduce the risk of poverty and ensure the most marginalised women and girls living in Ireland are supported through its social protection system?
3. What action is being taken to individualise the social protection system so women have independent access to all payments and are not considered as qualified adults?
4. Will the State deliver a Universal Pension system?
5. Will the Universal Pension system be benchmarked to maintain the relative value of the State pension compared to earnings growth and price inflation?
6. In the interim - prior to the delivery of a Universal Pension system - will the State provide for retrospective contributions, including: for those caring more than 20 years to ensure a full State Pension (Contributory); to allow access for women born before 01/09/1946 to the Homemaker's and Home Caring Periods schemes; and a once-off, ring-fenced retrospective scheme in acknowledgement of the injustices of the marriage bar?

## Questions on the Protection of the Family and Children – Article 10

1. What measures is the State taking to ensure compliance with the Istanbul Convention, including with respect to the provision of refuge spaces to support victims and survivors of domestic violence?
2. What steps are being taken to move to a fully universal model of social services?
3. Is the State committed to the delivery of a universal childcare model which is publicly funded and publicly delivered? When will this model be implemented?
4. What is the current status of the Irish Constitution as it relates to family, care and gender equality? What provisions will be included in the referendum?
5. What range of services and supports are being provided to ensure the dignity, respect and independence of individuals accessing services, including older people and disabled people are promoted and protected?
6. What is the State's timeframe for the establishment of a Commission of Care? What is the proposed scope of the new Commission?
7. What actions are being taken to address the impact of housing insecurity on lone parent families? Will a Taskforce be established to address this growing problem?



## Questions on the right to an adequate standard of living – Article 11

1. What steps will the Government take to avoid retrogression and the exclusion of groups from much-needed access to Government schemes to assist with the cost of living?
2. Does the Government intend to define income adequacy so that it can be more effective, and transparent in its measures to achieve income adequacy?
3. Will the Government articulate what concrete steps it will take in order to ensure that the right levers are engaged to deliver income adequacy?
4. Will the Government commit to addressing the gap between the cost of living and social welfare rates, and enabling people to afford a decent standard of living by benchmarking social welfare rates on an annual basis against a level that is adequate to lift people above the poverty line and provide them with a Minimum Essential Standard of living. (This could be achieved through progressive realisation)?
5. Will the Government commit to achieving some measure of income adequacy by benchmarking the state pension to at least equal to 34% of total average earnings?
6. What action is the State taking to reduce the risk of poverty and ensure the most marginalised women and girls living in Ireland are supported through its social protection system?
7. What action is being taken to individualise the social protection system so women have independent access to all payments and are not considered as qualified adults?
8. Will the State deliver a Universal Pension system?
9. Will the State provide for retrospective contributions, including: for those caring more than 20 years to ensure a full State Pension (Contributory); to allow access for women born before 01/09/1946 to the Homemaker's and Home Caring Periods schemes; and a once-off, ring-fenced retrospective scheme in acknowledgement of the injustices of the marriage bar?
10. Does the Government consider that the Daily Expenses Allowance for people in Direct Provision, particularly for families and children is adequate to meet their needs?

## Questions on the right to physical and mental health – Article 12

1. Having particular regard to the most recent Sláintecare Progress Report and Action Plans, what is the current status of the multi-annual strategy due to commence in 2024 and what budgetary commitments and associated timeframes have been set to implement Sláintecare in full?
2. What plans have the Government prioritised to deal with the long-term capacity deficits in the public health system?
3. How many of the recommendations in the De Buitléir report has the Government completed in its goal to unravel the complex mingling of public and private care provision in public hospitals?
4. How is the Government tackling the structural causes and impacts of health inequality both across departments and within the design and delivery of its health services and does it have specific outcome targets linked to this?



# **THE COMMUNITY PLATFORM**

**THE COMMUNITY PLATFORM IS AN ALLIANCE OF 31 NATIONAL NETWORKS AND ORGANISATIONS IN THE COMMUNITY AND VOLUNTARY SECTOR WORKING TO ADDRESS POVERTY, SOCIAL EXCLUSION AND INEQUALITY.**



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- Age Action Ireland
- All Together in Dignity (ATD) Ireland
- Community Action Network
- Community Work Ireland
- Cairde
- European Anti-Poverty Network Ireland
- Family Resource Centre National Forum
- Financial Justice Ireland
- Focus Ireland
- Immigrant Council of Ireland
- Independent Living Movement Ireland
- Irish National Organisation of the Unemployed
- Irish Penal Reform Trust
- Irish Refugee Council
- Irish Rural Link
- Irish Traveller Movement
- Migrant Rights Centre Ireland
- National Adult Literacy Agency
- National Traveller Women's Forum
- National Women's Council
- One Family
- Pavee Point
- Rape Crisis Network Ireland
- Safe Ireland
- Sign Language Interpreting Service
- Simon Communities of Ireland
- TASC
- Threshold
- Treoir
- Women's Aid
- Women's Collective Ireland







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