

# SOCIAL POLICY UPDATE

Volume 16, Issue 2, April 2023



## Introduction

Welcome to the April 2023 edition of Social Policy Update.

In this edition, we feature our most recent responses to public policy consultations, including submissions on the Pathways to Work Strategy, and to the Housing Commission consultation on long-term housing policy. We also preview some of the headline caller and query data from CISs for the first quarter of 2023.

In the 'On the Ground' section, we review the Social Policy Returns submitted by CISs and CIPS during the first quarter of 2023, with a focus on issues relating to Revenue, Housing and the Medical Card.

Current Parliamentary Questions are highlighted as they reflect some of the central issues that staff in services are also dealing with from clients (as noted in our 'On the Ground' section) and we conclude with some news of developments on the policy front – including an ESRI report on migrant integration, a Housing Agency report on social housing assessments and a recent report on HSE schemes for medical treatment abroad from the Office of the Ombudsman.

This section provides information about CIB's social policy work and that of our funded services - focusing on recent submissions and reports.

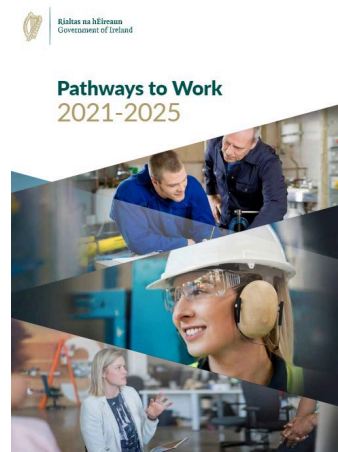
- Pathways to Work 2021 – 2025: Submission on Mid-Term Review;
- Submission on Personal Taxation System;
- Submission on long-term housing policy - Housing Commission;
- Joint Oireachtas Committee hearing - MABS presentation;
- An Exploratory Analysis of Insurance Exclusion among Travellers - NTMABS report;
- Data Hub Q1, 2023.



## Pathways to Work 2021 – 2025: Submission on Mid-Term review

CIB has made a submission to the Department of Social Protection's mid-term review of the Pathways to Work 2021-2025 Strategy, which lays out the Government's national employment services strategy. The document contains 83 specific commitments over five strands of action to achieve these ambitions. The focus of this review is to identify what amendments, if any, should be made to the strategy and to determine the priorities until 2025.

CIB's submission highlighted the extent to which CISs are frequently contacted by people seeking information about eligibility criteria for the range of activation supports available and about what options would be most appropriate for them - including managing social welfare payments and participation in work/training programmes. It went on to highlight the 30,000 jobseeker payment queries recorded in CISs in 2022, and the 20,000-plus queries in relation to Working Family Payment and activation schemes.



While acknowledging the significant progress in the delivery of the goals set out in the Strategy (and related Action Plans) up to this point, the submission used the feedback from delivery services to point to key areas of focus for the remainder of the strategy. These included:-

- Identifying areas where there are skills shortages and focusing on the provision of relevant education, training, and upskilling.
- Specifically targeting people with minimal or no connection with the labour force and developing mechanisms for individually tailored supports.
- Proactively providing targeted supports for ongoing education to enable people trapped in low paid and unsuitable employment (for example, some lone parents), to progress to better paid and appropriate work.
- Developing more integrated structures at local and regional level to address the social and economic factors that cause alienation from the labour force.
- Addressing the fact that many people on social welfare payments have multi-faceted problems such as inadequate housing or homelessness, mental health difficulties, addiction problems, disability, or membership of ethnic minorities.

The submission also pointed to some of the difficulties that CIS clients have in engaging with activation supports. It noted specific eligibility concerns, difficulties for self-employed people and - using case examples - went on to cite particular administrative, social and economic barriers that impact on people's ability to access education and training opportunities and activation measures.

[The submission can be accessed on the CIB website.](#)

## Submission on Personal Taxation System



In April, CIB made a submission to the Department of Finance in relation to their consultation on the personal taxation system in Ireland, which had been proposed as part of Budget 2023.

This submission was based on the feedback received from our services in relation to tax matters as they arise in their dealings with clients and it builds on some of the elements articulated in CIB's submission to the Commission on Taxation and Welfare in January 2022. In this context, the submission noted the importance of linking taxation policy with welfare policy and of ensuring that work pays and, specifically that households that are reliant on social welfare (or on a combination of income from work and social welfare) are kept out of poverty.

An underlying element of the submission was the extent to which the personal taxation system must take into account the social goal of creating and developing a more equitable and inclusive society. It made an argument for the need to shift from income-based taxes toward taxes that are wealth-oriented and suggested that while revenues from personal taxes must be increased in order to ensure fiscal sustainability, this needs to be done in a manner that minimises economic, social and environmental costs.

On the specific changes that need to be addressed in the medium term, the submission pointed to the following:-

- Consideration of how the personal tax system can be amended to lessen social inequality and to ensure that 'nobody is left behind' in the context of social solidarity, social cohesion and ensuring that the system is both fair and seen to be fair;
- The need to move expeditiously towards the full individualisation of the personal tax system;
- The need to address the anomaly where cohabiting couples are treated differently than married couples;

- The role of a Rent Tax Credit in addressing the housing/ rental issues in the short to medium-term;
- The need to broaden the personal tax base by increasing the take from other income streams, e.g., inheritance tax;
- The need to ensure that current non-taxable social welfare benefits remain.

[The submission can be accessed on the CIB website here.](#)

### **Long-term housing policy – submission to Housing Commission**

The Housing Commission is currently engaged in a public consultation which will be used to inform their consideration of a long-term housing policy post-2030, to which CIB has made a submission.

Given the prevalence of housing-related data in the feedback from CIB supported services, the central elements of our submission were the specific concerns from these services that relate to accessing social and affordable housing. It noted that of the 75,414 housing queries dealt with by CISs in 2022, over half (52%) were related to local authority/social housing issues, and of these, almost 30% were related to the Housing Assistance Payment (HAP).



The submission reasserted the need to invest directly in the provision of social housing to a substantially greater extent than at present, noting that an enhanced state-funded social housing sector has the potential to lessen the pressures that exist across all parts of the private housing sector, thereby increasing accessibility and affordability for all.

In addition, the submission noted the private rental sector needs substantial reform in terms of tenure, rent certainty and affordability, and appropriate standards, if it is to be a socially and culturally acceptable long-term housing option. Such reforms could include the following measures:-

- Abolition of ‘no-fault’ evictions.
- Further legislation to improve long-term security of tenure.
- Introduction of an arrears management strategy, similar to the mortgage arrears framework provisions.
- Revision of HAP rent limits in line with market rents.
- Expansion of Rent Pressure Zones and greater enforcement of such zones.
- Additional measures (e.g., tax) to incentivise landlords to remain in or enter the market.
- More curbs on short-term letting.

In the context of building standards and regulations, the submission stated that adequate resources need to be provided for the inspection of accommodation and the enforcement of standards and regulations. It went on to highlight concerns about the effect that poor quality, design shortcomings and inadequate application of standards and regulations has on the quality of life of people with disabilities and other vulnerable groups. It specifically suggested the better application of universal design, lifetime adaptable and a future-proofing approach (following Universal Design Guidelines) which could help to ensure that the housing needs of people with disabilities are met. This would also likely result in a reduced need for retrofitting, resulting in better provision for a changing and ageing demographic.

The submission drew on recent CIB published collaborative social policy reports on housing - specifically [“Renting and Risk: An analysis of the vulnerabilities of renting”](#) and [The Right Home: The housing needs of people with disabilities.](#)

[The full submission can be accessed here.](#)

## MABS presentation to Joint Oireachtas Committee



In March, representatives from MABS Support (along with FLAC) made a presentation to the Joint Oireachtas Committee on Finance, Public Expenditure and Reform, and Taoiseach in relation to their ongoing series of meetings concerning the role of investment funds - or non-bank entities - in the property market. The MABS presentation focused on the particular activities of non-banks in the areas of mortgage lending and the servicing of non-performing loans (NPLs) to individuals.

This follows on from the MABS submission to the Department of Finance's consultation on the transposition of the EU Credit Services and Credit Purchaser's Directive into Irish law (which has to happen by December 2023).

The MABS submission (and presentation to the Oireachtas Committee) highlighted the positive elements of a longstanding protocol, as agreed between MABS and the Banking Payments Federation of Ireland (BPF), to resolve mortgage debt problems in a practical and sustainable manner for borrowers. While acknowledging the role that non-bank entities play in increasing competition within the sector, the submission stated that this must be accompanied by appropriate regulation to guarantee the rights of consumers and debtors.

In this context, MABS highlighted a number of key concerns from their work with clients and non-bank entities. These concerns included difficulties for clients with regard to loan transparency and communication with these firms, clients' (and MABS) knowledge regarding the chain of loan ownership within the credit supply chain, concerns about the lack of public accountability and - a key concern for borrowers most recently - the impact of the significant interest rate increases during the past six months.

[A record of the Committee hearing can be accessed here.](#)

## An Exploratory Analysis of Insurance Exclusion among Travellers - NTMABS report

CIB participated at the National Traveller MABS launch of their report on '*An Exploratory Analysis of Insurance Exclusion among Travellers*' on 19 April. The research was carried out by Dr Stuart Stamp and sought the views of a range of Traveller groups and individuals - to get their personal experience of insurance access and use, and their sense of perspective as to its relevance, both to them and to the community as a whole. These enquiries were conducted to inform National Traveller MABS' financial inclusion work, and were carried out by way of emails, one-to-one interviews and focus groups. A key point from the research is that Travellers along with everyone else should be able to make full and informed financial choices about what is right for them and their families.



The main findings from the research were that a number of insurance services are currently of little relevance to Travellers, as a result of the demographic and socio-economic characteristics of the community as a whole. Examples here are serious illness and also income protection and health, given persistently high levels of unemployment across the community.

Four themes emerged from the research, notably:-

- a widespread lack of awareness of the existence of many types of insurance;
- those employed and/or living in owner occupied accommodation being more likely to be connected into the financial services 'grid', in terms of having information on, or actually

- having, insurance;
- suggestions that increased cost appears to be a factor in relation to motor insurance where an address signifies the applicant to be a Traveller;
- access to home insurance being an issue for those in mobile home accommodation.



### Caller and query data, Q1, 2023

The Data Hub section of the CIB website is being updated to include Quarter One, 2023 data relating to Callers and Queries to the national network of Citizens Information Services (CISs).

This data sets out a wide range of statistical information on the queries, benefits and concerns that services are assisting the public with across all aspects of rights and entitlements and access to social and public services. It also sets out a profile of callers to services, highlighting key trends in terms of age, gender and nationality.

During Q1 2023, there were **107,403 callers** to CISs nationally (a 12.8% increase on the same period in 2022), with almost **220,000 queries** (15% increase).

The **Medical Card, Fuel Allowance and State Pension (Contributory)** were the single payments or schemes with the highest number of queries.

An analysis of trends within the main query categories shows us that **Social Welfare** queries grew by almost 19% - with key increases noted in the areas of *Extra Social Welfare Benefits* (36% increase) and *Older and Retired People* (increase of 31%).

**Housing** queries increased by 26% on the same quarter in 2022, and within this we can see significant increases in queries relating to *Renting a Home* (44% increase), *Notice/Eviction/Disputes* (35% increase) and a doubling of queries in relation to the *Residential Tenancies Board* (RTB).

**Health entitlements** queries increased by 14.5%, when compared to the same quarter in 2022, with the *Medical Card* accounting for 62% of all Health-related queries. It is also note-worthy that *Fair Deal*-related queries increased by 35%.

**Money and Tax** queries grew by 44% on the same quarter in 2022. Within this broad category, our analysis shows significant increases in queries regarding *Income Tax Credits and Reliefs* (58%), *Income Tax* (39%) and *Revenue Online* (70%).

[Access to the CIB Data Hub is here.](#)

See also the 'On the Ground' section in this edition for a more detailed analysis of the policy feedback from services during Q1.

In this section we provide an overview of the Social Policy Returns that were submitted by CISs and CIPS in the first quarter of 2023. During this time, there were noteworthy increases in reports relating to money and tax issues, while housing and the Medical Card continued to be areas of particular concern.



## Review of SPRs, Q1 2023

### Callers and queries

During the first quarter of 2023, over **107,000 people** contacted Citizens Information Services (CISs) with almost **220,000 queries**. In addition, the Citizens Information Phone Service answered

**34,235** calls during Q1.

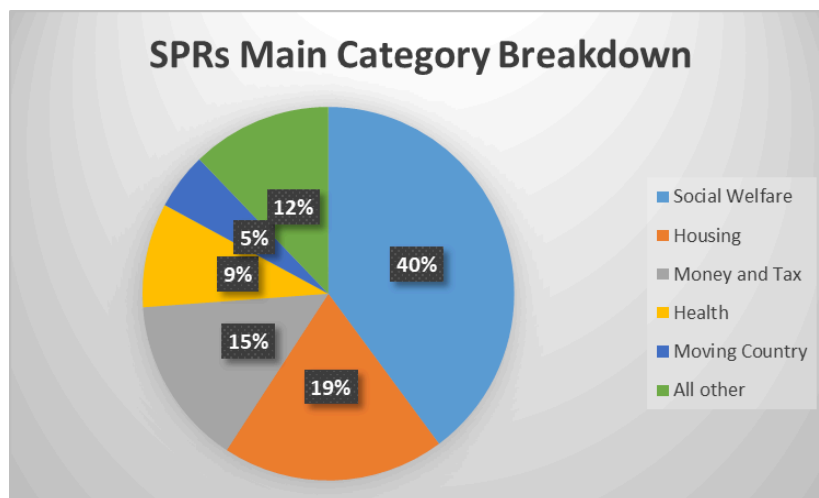
Schemes such as *Medical Card* (10,251), *Fuel Allowance* (8,819), *State Pension (Contributory)* (8,081) and *Disability Allowance* (7,259) featured most often amongst the queries to CISs. It is also notable that queries in relation to *Extra Social Welfare Benefits* increased by 36% when compared with the same period in 2022 and within this category, there was a 75% increase in queries in relation to *Fuel Allowance*.



### Social Policy Returns

CISs submitted **1,988** Social Policy Returns (SPRs) during Q1 2023 and the Citizens Information Phone Service (CIPS) submitted an additional **248** SPRs, bringing the total number recorded by services to **2,236** -which is on a par with the level submitted during the same time in 2022.

The broad areas that featured most prominently in the reports were Social Welfare, Housing, Money and Tax, Health and Moving Country – with 88% of all SPRs related to these five areas.



When compared to the first quarter of 2022, we can see that there has been an increase in the relative share of SPRs relating to Social Welfare (increase of 4%), Housing (increase of 7%) and Money and Tax (increase of 8%).

In this analysis, we drill down into these broad categories and highlight the particular difficulties that CIS and CIPS callers are experiencing as they seek assistance in accessing specific payments and schemes.

The table below lists the ten payments most often reported in the social policy feedback from services from January to March 2023.

Payment/ Scheme	
1	Income Tax Credits and Reliefs
2	Applying for Local Authority/Social Housing
3	Fuel Allowance
4	Medical Card
5	Housing Assistance Payment (HAP)
6	Homelessness
7	Revenue online
8	Basic Supplementary Welfare Allowance
9	Income Tax
10	Carer's Allowance

## Money and Tax concerns



There were **14,768 queries** in relation to Money and Tax in CISs during this quarter - an increase of almost 44% on the same quarter last year - with the particular query categories of *Income Tax Credits and Reliefs* increasing by over 58%, *Income Tax* by 39% and *Revenue Online* queries increasing by 70%.

In keeping with these query trends, the number of **Social Policy Returns** concerning Money & Tax issues more than doubled. Three of the schemes listed above in the Top Ten relate to Money and Tax queries – *Income Tax Credits and Reliefs*, *Income Tax*, and *Revenue Online*, which is consistent with the increases evident in the query figures.

Our analysis of the policy feedback indicates that the indicative cases are mainly concerned with online access difficulties for clients. It would seem that these issues are being acutely experienced by older people in particular, with many reports of cases relating to people aged over 70 years, who were confused and anxious about many aspects of the process. In addition, it would seem that the Budget 2023 increase in State Pension has meant that some pension recipients are liable for tax for the first time as pensioners and are being required to engage with Revenue Online. Many of these clients will not have had to deal with Revenue for many years and may have never had to register with the myAccount facility.

The requirement for online-only access to Revenue services to process all routine tax affairs has been in place for a number of years and it would seem to be both efficient and effective for a majority of users. Nonetheless, our ongoing analysis of policy feedback related to money and tax issues is providing a great deal of evidence to suggest that there are significant difficulties being experienced by some clients in complying with the requirement to conduct tax affairs online. As we have consistently noted regarding online access to public services generally, these difficulties are experienced by people who are not digitally literate, those with limited (or no) access to broadband (due to technical or affordability reasons) and also those with poor English language and literacy skills.

Linked to the online access issues, and adding to the frustration for many, are the difficulties for clients (and the CIS staff who are trying to support them) in making contact with Revenue personnel directly via the Revenue helpline and limited access to customer support – with reports indicating that long on-hold waiting times and automated call-answering are frustrating many callers. Some CIS staff have also noted that the option for email support (via MyEnquiries) appears to be limited, with services reporting delayed responses and unanswered emails.

The feedback highlighted the extent to which some clients need specific or one-to-one assistance in understanding and dealing with their tax liabilities across a range of both routine and complex matters (with the feedback noting specifics around PAYE issues, importation of vehicles, Income Tax Returns, the Help To Buy scheme, emergency tax, VAT refunds for housing adaptations for older people). In most of the cases reported this barrier to access is also having a financial impact on the client - for instance, in claiming tax credits, or obtaining the Employment Detail Summary when applying for other services such as the Medical Card.



Other issues raised in feedback continue to point to the anomalous position between the tax and social welfare treatment of cohabiting (non-marital) couples, in that they are jointly assessed for social welfare purposes but as separate, unconnected individuals in the context of income tax assessment. The case studies provided by services include instances where a married or civil partner caring for one or more dependents (who are not the spouse or partner) can claim the Home Carer Tax Credit, but this is not available to non-marital couples. Feedback also reflects the limitations of the Single Person Child Carer tax credit. In some instances where there is shared

parenting, the secondary carer is unable to receive the credit when the main carer is cohabiting or chooses not to relinquish the credit to them - even though they may be making a significant financial contribution to the upkeep of the child. (See Minister McGrath's response to a Parliamentary Question on this in the 'In the Oireachtas' section of this edition).

The application of the Rent Tax Credit as announced in Budget 2023 has also been consistently highlighted in the feedback since January and is indicative of the difficulties for tenants whose landlord is not registered with the RTB and who, as a consequence, cannot claim the tax credit.

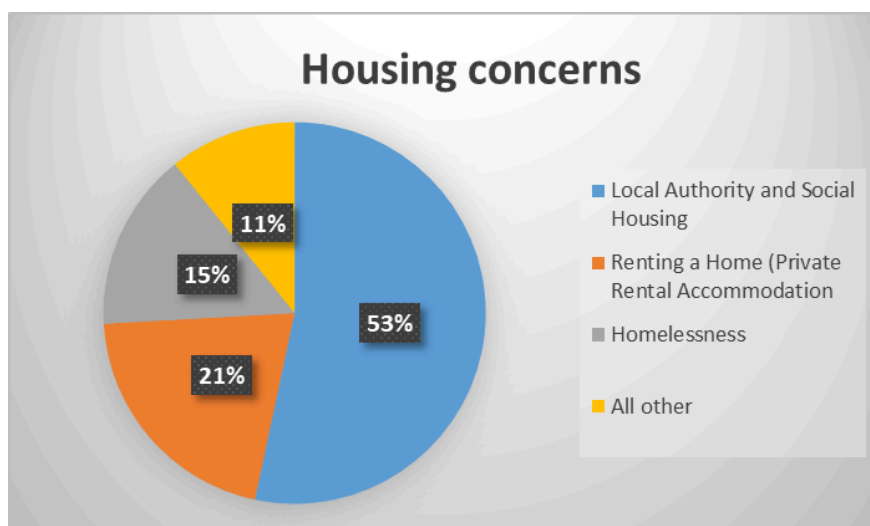
## Housing concerns



There were **23,148 queries** made in relation to housing in CISs during the first quarter of this year - an increase of 26% on the number submitted in Q1 2022.

This substantial increase in housing queries was surpassed by the extent of the increase in SPRs submitted by services in relation to housing - where we saw a 60% increase. This is on top of a year-on-year increase in SPRs of one third from 2021 to 2022.

Given the reliance on the private rented market to meet social housing need, it is no surprise that most of this feedback concerns the sub-categories of *Applying for Local Authority/ Social Housing* and *Renting a Home* - with the social housing assessment application process and the Housing Assistance Payment being the most reported concerns here.



Difficulties with the **Residential Tenancies Board (RTB)** processes also registered an increased level of concern during this quarter (which is consistent with a doubling of queries in relation to the RTB). The majority of the feedback referencing the RTB was detailing instances where clients had problems accessing customer support, with long telephone waiting times and unanswered emails being reported. The other main issue raised was in relation to tenants who could not avail of the newly-introduced Rent Tax Credit (as their landlord had not registered the tenancy with the RTB). Some of these cases noted an unwillingness on behalf of the tenant to press the landlord on the issue, given their vulnerable position as tenants in the current rental market.

As had been the case for some time, the core issue that services are evidencing in their work with clients is the chronic undersupply of properties available to rent - and for those properties that are available, information staff continue to point to the difficulties for clients in affording the universally high rent payments. One of the most striking elements of the feedback this quarter is the stark nature of the apparent lack of choice for tenants, with a wide range of case examples providing a snapshot of the pressures, stresses and despair for many. These include:-

- Tenants who are forced to over-hold properties (when a tenant remains in a property after a valid notice of termination has expired), driven by a fear of (and in some cases a lack of)

- emergency accommodation - particularly for families with children;
- Tenants who are forced to live in over-crowded accommodation, in many cases with three generations of family members;
- Tenants whose relationship has broken down but feel that their only option is to continue living with their partner, often times in acrimonious situations;
- Tenants who are forced into couch-surfing, or living with friends, sometimes in rotation, in situations that are not sustainable for those involved:
- Tenants who are working in full-time employment but whose disposable income, even with housing support payments, is significantly eroded by high rent;
- Tenants who have been seeking alternative housing for anywhere between six and 12 months or more.



The feedback also highlights the extent to which the **income threshold** for social housing assessments is not reflective of current market rents - with the same being reported in the case of the HAP rental limits (even with the discretionary elements provided by Local Authorities).

It also seems that the increase of €5,000 in baseline income thresholds in January 2023 is appearing to provide little relief so far, given the extent to which demand for rental properties is exceeding supply. Some of the cases evidence many situations of tenants who have been approved for social housing but who cannot find suitable properties.

The extent to which **Homelessness** is a real issue for clients can be seen in 15% of the housing SPRs that were submitted during this quarter. An analysis of the feedback shows that this is not just the potential threat but the experience, with many cases citing the distress and anxiety experienced by tenants in a range of situations - both working and dependent on social welfare - who are unable to find or secure housing over a relatively long period of time. This includes parents with babies and young children, older and retired people, people with mental health difficulties, lone parents, and people with disabilities.

Services also continue to note the problems for some tenants in accessing homeless supports from their Local Authority. Other difficulties highlighted include the delays in processing social housing applications within Local Authorities, the length of time that people are spending on waiting lists for social housing (with 10-15 years being reporting in many cases), and difficulties for some applicants in accessing information, forms and support from Local Authorities – particularly for those with language or literacy difficulties.

### Medical Card issues

The Medical Card (MC) resumes its place as the most-queried single payment or scheme in CISs during the first quarter of 2023 (having been slightly eclipsed by Fuel Allowance in Q4 2022) and it continues to represent a substantial number of SPRs in the Health category.

For the past number of years, the predominant issue being reported in relation to the Medical Card has been difficulties for people in applying for and renewing their cards online. As the relative share of concerns relating to online access issues has been decreasing, the reporting of **difficulties for MC patients in accessing GP and dental services locally** has been increasing and is the leading concern within the feedback this quarter. Many of the cases provide details of patients approaching multiple medical practices in their local area (and beyond) to be met with rejections on the basis that practices are full.



In response to a Parliamentary Question on the issue in March 2023, Minister for Health, Stephen Donnelly stated that *“where a GMS patient experiences difficulty in finding a GP to accept them as a patient, the person concerned having unsuccessfully applied to at least three*

*GPs in the area (or fewer if there are fewer GPs in the area) can apply to the HSE National Medical Card Unit which has the power to assign that person to a GP's GMS patient list....."*

Regarding Medical Card patient access to dental care, Minister Donnelly also stated in the Dáil in March 2023 that *"... I am aware that there are some towns with no or limited DTSS dentists that have sufficient capacity to accept new patients. Where access to a dentist is difficult, local HSE services assist patients who make enquiries and make lists of DTSS contractors available to medical card holders. In exceptional circumstances, the HSE assists patients to access emergency dental treatment by directly contacting private contractors or arranging treatment to be provided by HSE-employed dentists..."*

*The Government recognises that substantive reform of the DTSS is required, as set out in the National Oral Health Policy.....While it will take a number of years to bring reform to complete fruition, there will be an early emphasis in implementation on addressing the current issues, including the reform of the provision of services for medical card holders".*

### **Fuel Allowance concerns**

During this quarter, most of the feedback in relation to Fuel Allowance highlighted delays in processing applications. An increase in applications for the allowance was expected given the



January 2023 changes to the means assessment thresholds for the scheme (as announced in Budget 2023) which were expected to extend eligibility to over 80,000 households. In response to a PQ on 9 February 2023, Minister Humphreys stated that *"since the budget announcement...a number of changes were made to the Department's IT systems and additional staffing resources are in place to help process the increased number of applications received. A telephone service is also in place to support customers."*

*A new streamlined online application service was opened on 5 December 2022 to assist applicants, especially those over 70, to apply for the payment at a time and place that suits them. A new shorter paper application for those over 70 is also available to download from the Government's website, gov.ie. In early December, an information campaign commenced to raise awareness about the payment and the new online service, particularly amongst those over age 70".*

In the week ending 19 March 2023, Minister Humphreys stated that there were less than 1,300 claims from those aged over 70 awaiting decision and only 300 under age 70 waiting to be processed and that these remaining claims were to be processed in the coming weeks. She also stated that 32,500 additional households had been awarded Fuel Allowance since the Budget and that over 24,000 of these are aged 70 or over.

Other concerns raised regarding Fuel Allowance included the situation for Carer's Allowance recipients who are not entitled to the payment, and also eligibility difficulties for those in receipt of Illness Benefit on a long-term basis and CE Scheme participants who transfer to another benefit (such as Illness Benefit, Maternity Benefit, Benefit for over-65s).

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In this section, we cover recent policy-related Parliamentary Questions and debates in the Oireachtas that are relevant to concerns raised in feedback from our services.

- Cost of disability update;
- Citizenship processing times;
- Cohabiting couples – tax treatment;
- JobPath scheme.

**In the  
Oireachtas**

### **Cost of disability update [PQ 15041/23; 28 March 2023]**

**Deputy Claire Kerrane** (*Roscommon-Galway, Sinn Fein*) asked the Minister for Social Protection if “she will provide an update on the consultation process as part of her Department’s work on addressing the cost of disability...”

In response, **Minister Heather Humphreys** (*Cavan-Monaghan, Fine Gael*) stated that “responses to the report were considered regularly by the National Disability Inclusion Strategy Steering Group as part of its monitoring of the National Disability Inclusion Strategy. This group was chaired by my colleague, the Minister of State with responsibility for Disability, Anne Rabbitte TD. The group comprised of relevant departments, agencies, and a Disability Stakeholder Group. The work of the Steering Group was due to end in 2021 but was extended to the end of 2022.

A new national cross-Government strategy to succeed the National Disability Inclusion Strategy and to satisfy the Programme for Government commitment to develop a coordinated plan to continuously advance the implementation of the UNCRPD is being developed throughout 2023 by all government departments and agencies. The Cost of Disability report is an important element of the evidence base which will inform the scope and focus of the strategy.

Officials in my Department are working on a straw man on disability reform. The straw man will deliver on existing Government commitments and take account of the findings and recommendations of a number of key reports, including the Cost of Disability report. In accordance with a commitment under the Roadmap for Social Inclusion (2020-2025), the straw man will present proposals on the restructuring of long-term disability payments. It will look at simplifying the system and will take account of the concerns expressed in the Make Work Pay report. The straw man will also look at any current inconsistencies/anomalies related to our disability income and employment supports.

Work on the straw man is at an advanced stage. Following the publication of the paper in Q2, a wide scale public consultation is planned with stakeholders, the general public and advocacy groups”.

### **Citizenship processing times [PQ 11436/23; 7 March 2023]**



**Deputy Niamh Smith** (*Cavan-Monaghan, Fianna Fail*) asked the Tánaiste and Minister for Justice “the reasons behind the delays in INIS; the steps he intends to take in order to reduce the delays...”

In response, **Minister Simon Harris** (*Wicklow, Fine Gael*) stated that “I understand the Deputy's question relates to the granting of Irish citizenship through naturalisation.

The median processing time for applications now currently stands at 19 months. I understand the extended wait times can be frustrating for applicants and my Department has been working hard to clear backlogs.....

My Department is taking a number of steps to speed up the processing of applications and a number of digitisation measures have been introduced to increase efficiency in the process.

In 2022 there were 13,613 Certificates of Naturalisation issued, including 1,719 in respect of minor applicants. This represents a 39% increase on the number of certificates issued for 2021 (9,780) and demonstrates my Department's commitment to processing applications in a timely manner.

There are ongoing developments and improvements being made to the citizenship application process. Significant reforms have been introduced for customers to streamline the number of proofs required to establish their identity and residency as part of the application process. A new scorecard was introduced to help applicants to complete their applications. Since this initiative

went live, a preliminary review of applications received indicates that the quality of the applications has markedly improved.

I welcome this development which builds on other innovative measures introduced in the application process, including the deployment of “Tara” the e-chat bot, as well as e-payments, e-tax clearance and Gardaí e-vetting, and the removal of the requirement to provide the original passport when making an application, all of which have positively enhanced the applicant's experience. The end result of the digitisation process will be to free up more staff to focus on processing applications in a timely and efficient manner, to improve service to our customers and reduce waiting times”.

### **Cohabiting couples – tax treatment [PQ 15809/23; 30 March 2023]**

**Deputy Brendan Griffin** (*Kerry, Fine Gael*) asked the Minister for Finance “why cohabiting couples are assessed as individuals by the Revenue Commissioners; if the option to be jointly assessed will be introduced...”

**Minister Michael McGrath** (*Cork South Central, Fianna Fáil*) stated that “...the basis for the current tax treatment of couples derives from the Supreme Court decision in *Murphy vs. Attorney General* (1980). This decision was based on Article 41.3.1 of the Constitution where the State pledges to protect the institution of marriage. The decision held that it was contrary to the Constitution for a married couple, both of whom are working, to pay more tax than two single people living together and having the same income. The Constitutional protection of Article 41.3.1 does not extend to non-married couples.

It is important to point out that if the tax treatment of married couples was to be extended to cohabiting couples, consideration would need to be given to the practicalities that would arise for Revenue if they were to administer such a system.

It would be very difficult for Revenue to administer a regime for cohabitants, similar to that for married couples. Married couples and civil partners have a verifiable official confirmation of their status. It would be difficult, intrusive and time-consuming to confirm declarations by individuals that they were actually cohabiting and to establish when cohabitation started or ceased.



There would also be legal issues with regard to ‘connected persons’. To counter tax avoidance, ‘connected persons’ are frequently defined throughout the various Tax Acts. The definitions extend to relatives and children of spouses and civil partners. This would be very difficult to prove and enforce in respect of persons connected with a cohabiting couple where the couple has no legal recognition.....

It should be noted that the recent report of the Commission on Taxation and Welfare (CoTW) put forward no recommendation regarding the tax treatment of cohabiting couples. However, it did recommend a phased move towards individualisation of the Standard Rate Cut off Point as a step towards addressing disparities in the income tax system, facilitating increased employment, and decreasing the gap in the employment rate between men and women.

Should this occur, couples that are married or in a civil partnership would no longer be treated differently to cohabitants as each person would be treated as a single taxpayer without the option of being jointly assessed. It should be noted that both the PRSI and Universal Social Charge are already applied on an individualised basis.

Finally, as signalled in the Budget, my Department has begun work on a review of the personal tax system\* having regard to the medium term and taking account of the recent report of the CoTW, and considering a range of personal taxation issues”.

[\\*NOTE: CIB has made a submission to this consultation. See the “Informing Policy: CIB Policy and Research News” section in this edition.](#)

## JobPath scheme [PQ 15344/23; 28 March 2023]

**Deputy Claire Kerrane** (*Roscommon-Galway, Sinn Fein*) asked the Minister for Social Protection “if she will carry out a review of the JobPath scheme; and if she will make a statement on the matter.”



In response, **Minister Heather Humphreys** (*Cavan-Monaghan, Fine Gael*) stated that “as the Deputy will be aware, referrals to the JobPath service have now ceased and the service is in a run-off phase, with only clients referred up to June 2022 remaining engaged with the service. Research into JobPath, including by the OECD, indicates that the programme led to positive employment and earnings outcomes across a variety of hard-to-reach groups.

As part of a restructuring of employment services, my Department has increased its employment service capacity delivered through Intreo and has expanded employment services in some areas of the State where there were no local employment services with the introduction of the new Intreo partners model - the Intreo partners local area employment service and the Intreo partners national employment service. Continuous stakeholder engagement with both local and national service providers has been key to both the development and successful implementation of this new employment services delivery model.

A distinctive client journey has been embedded into the employment services process whereby jobseekers on the live register, after engaging with Intreo in the first 12 months, are referred first to the Intreo partners national employment service, and after 24 months to the Intreo partners local area employment service, which is designed to engage with those with greater barriers to the labour market. In this way, the client is referred to the most appropriate service at each point in time on their client journey.....

A mid-term review of the actions and commitments in the Pathways to Work strategy is under way at present to ensure they remain relevant and effective in improving the employment prospects and outcomes for people under-represented in the labour market. A public consultation\* is ongoing with a closing date of this Friday, 31 March”.

\*NOTE: CIB has made a submission to this consultation. See the “Informing Policy: CIB Policy and Research News” section in this edition

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Here we feature research and recent policy developments at national level that are likely to be of interest to those engaged in policy work.

- Monitoring Report on Integration 2022 - ESRI;
- Summary of Social Housing Assessments 2022 – The Housing Agency;
- Residential Mortgage Arrears & Repossessions Statistics (Q4 2022) - Central Bank;
- ‘In Sickness and in Debt’ - Ombudsman report.



**National  
Policy News  
& Resources**

### ESRI Monitoring Report on Integration 2022

In April, the Economic and Social Research Institute (ESRI) published a report which used a range of relevant data to compare the outcomes of the Irish and foreign-born population in key life areas – that is, in the context of employment, education, social inclusion and active citizenship. The research was funded by the Department of Children, Equality, Disability, Integration and Youth as part of the ongoing requirement to monitor integration outcomes and to respond to policy challenges in the area.



In 2021, Ireland continued to have one of the highest percentages of foreign-born residents (18%) among EU member states. However, in contrast to previous years, the share of migrants from outside the EU is now larger than the share of migrants from other EU countries, reflecting the effect of Brexit (as the sizeable number of UK migrants in Ireland now count as non-EU).

The report found that migrant labour market outcomes were more affected by the pandemic and associated public health restrictions than those of Irish-born workers - with the overall unemployment rate for migrants at 5.8% in early 2020, rising to 9.1% during the pandemic, but falling again to 5.9% in 2022.

This is slightly higher than the Irish-born unemployment rate of 4.6%.

In addition, the report noted that the employment rate for African migrants increased from 56% pre-pandemic to 74% in early 2022 – indicating some signs of progress amongst African migrants who have long faced disadvantages in the labour market.

In the context of education, the data suggests that while the Irish population is among the most highly educated in the EU, a greater share of the foreign-born population aged 25-34 has a third-level degree (67%) than the Irish-born population (56%) of that age.

Other key findings include:-

- Migrants have a higher ‘at-risk of poverty’ rate (17%) than Irish-born (12%);
- Migrants were much less likely to own their home (43%) than the Irish-born population (77%);
- Migrants face more issues relating to housing affordability, with 29% spending more than 30% of their income on housing (compared to 8% of the Irish-born population).

In terms of public policy, the report authors noted that housing is now a priority issue for integration, as migrants are disproportionately concentrated in private rented accommodation and are facing affordability challenges. In light of this, the report recommends that the successor to the Migrant Integration Strategy 2017-2021 needs to address the area of migrant housing and homelessness.

The report also highlighted the value of reliable data on ethnicity, noting that the introduction of a standard ethnic classification system across all public services (as proposed by recently published National Action Plan Against Racism) is a positive development.

[The report can be accessed here.](#)

## Summary of Social Housing Assessments 2022 – The Housing Agency

The Housing Agency has published the 2022 Summary of Social Housing Assessments (SSHA). This is an annual “point-in-time assessment”, which was carried out in November 2022, in order to better inform policy and plan for the delivery of the right types of housing support. The assessment brings together information from local authorities on households in their area that qualify for social housing support, but whose social housing need is not currently being met.



An Ghníomhaireacht  
Tithíochta  
The Housing Agency

The assessment does not count households currently living in local authority rented accommodation, approved housing body accommodation, accommodation provided under the Housing Assistance Payment (HAP)

scheme, accommodation provided under the Rental Accommodation Scheme (RAS), accommodation provided under the Social Housing Capital Expenditure Programme (SHCEP) schemes or any household on a transfer list. It is considered that their housing needs are being met, under these various measures.

The report stated that 57,842 households were assessed as qualified for housing support, as of 1 November 2022, and went on to set out the following key findings:-

- The number of households qualified for social housing support decreased by 1,405 (2.4%) since the previous assessment on 17 November 2021 and by 33,758 households (36.8%) compared to the first annual assessment conducted in September 2016;
- The four Dublin Authorities (Dublin City, Dún Laoghaire-Rathdown, Fingal and South Dublin) account for 42.6% of the national total;
- One-adult households remain the majority household grouping on the waiting list and grew proportionately from 54.9% of the total in 2021 to 56% in 2022;
- The employment status of most qualified applicants remains unemployed and 56% of households have an income from social welfare only;
- The Private Rented Sector (with and without Rent Supplement) remains the largest tenure type for households on the waiting list. However, this has been falling steadily since 2016 (from 67.4% to 39.7% in 2022);
- The proportion of households living with parents, relatives and friends stood at 37.0% (up from 36.4% in the last assessment);
- The proportion of households with a main applicant over 60 years of age has been growing year on year and now makes up 11.9% of total households, this is a 4.7 % increase on the proportion in this age range in 2016 (7.2%);
- For the first time, the SSHA can report on the number of households living in Direct Provision. In 2022, there were 572 households recorded in this current accommodation type;
- A Traveller Identifier question was also introduced in 2022, with 124 households identified as Irish Travellers. It is expected to take at least two years for all new and revised applications to respond to this new question.

[The full report can be accessed here.](#)

## **Central Bank - Residential Mortgage Arrears & Repossessions Statistics – Q4 2022**

In March 2023, the Central Bank published the Quarterly Report on Residential Mortgage Arrears and Repossessions for the fourth quarter of 2022.



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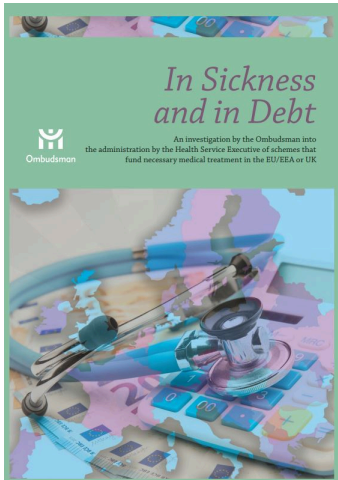
The Report noted the following headline figures with regard to Principal Dwelling Houses (PDH) or private dwellings:

- Over 46,000 households were in arrears – out of a total of 712,145 mortgages held by private households throughout the state. The outstanding balance on all lenders' PDH mortgage accounts in arrears of more than 90 days was just under €5.8 billion;
- The number of households in arrears over 90 days was reported at just over 29,000;
- Over 60,000 mortgages were classified as "restructured" and 88% of these were deemed to be meeting the terms of the arrangement. The total number of restructure arrangements fell by 1,153 accounts over the quarter and continues a long-term trend of decline;
- Non-bank entities held just over 16% of mortgage accounts for Principal Dwelling Houses and 77% of all PDH accounts in arrears over one year;
- The majority of accounts in mortgage arrears are not currently subject to legal proceedings and lenders were in possession of 486 PDH properties at the end of this quarter.

The Report also provides a breakdown of arrears, repossessions and restructures on Buy-To-Let properties (totaling over 76,000 mortgage accounts to a value of €11 billion).

[The Quarterly Report can be accessed here.](#)

## 'In Sickness and in Debt' - Ombudsman report



In April, the Office of the Ombudsman published a report on its investigation into the administration by the Health Service Executive (HSE) of schemes that fund necessary medical treatment in the EU/EEA or UK - the Treatment Abroad Scheme, the EU Cross Border Directive scheme and the Northern Ireland Planned Healthcare Scheme.

The report acknowledged the life changing impact of these schemes on patients and also noted that the Office had received complaints from those who have not benefited from being able to access the schemes. Having investigated these complaints, the report pointed to an “unreasonable and inflexible approach” by the HSE in administering the schemes and noted that some patients faced a fight to be reimbursed for the legitimate costs they had incurred - with many borrowing money and some falling into debt as a result.

In other cases, the report found that approval to have treatment abroad was unreasonably refused or delayed.

The Ombudsman, Mr Ger Deering, set out 21 recommendations in the report with the aim of improving the administration of the schemes for the benefit of patients. At the launch of the report, Mr Deering stated that the HSE had agreed to implement all of the recommendations in the report, following on from discussions that his office had with the Chief Executive of the HSE, Mr Bernard Gloster. A small number of recommendations are also relevant to the Department of Health, and have been accepted by the Department.

[The report can be accessed on the Ombudsman website here.](#)

*The “Social Policy Update” is a bi-monthly newsletter produced by CIB's Data and Research Team.*

*The Citizens Information Board is the national agency responsible for supporting the provision of information, advice and advocacy on social services, and for the provision of the Money Advice and Budgeting Service.*

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