

Coalition 2030

Submission to Joint Oireachtas Committee for Social Protection, Community and Rural Development and the Islands

February 21st 2023

Coalition 2030 is an alliance of 70 civil society organisations and networks across the international development, environmental, domestic anti-poverty and equality, and trade union sectors of society. We are grateful for the opportunity to make a submission to the Joint Oireachtas Committee for Social Protection, Community and Rural Development and the Islands regarding the SDG-related actions of the departments under the Committee's remit, namely the Department of Social Protection (DSP) and the Department of Rural and Community Development (DRCD).

This submission will firstly provide an overview of the policy context relevant to the work of both departments, as analysed by Coalition 2030. It will then provide information relating to the extent of integration of the SDGs into the current departmental Statements of Strategy, on the specific SDG targets for which each department is responsible for achievement, and the SDG-related actions to which the relevant departments have committed. This is before moving into accountability concerns. The submission will conclude with a call for increased Policy Coherence for the SDGs via the use of the SDGs as a frame or lens for policy-making from hereon in order to reach the furthest behind first, and mitigate a situation whereby certain groups of people in society are left behind.

Policy Context

The continuing effects of the pandemic and the cost of living and energy crisis have left people struggling to stand still, let alone progress towards the SDGs. The state's capacity to deliver on the SDGs was certainly affected by the Covid-19 pandemic, however key challenges such as the ongoing housing and accommodation crisis; meeting the needs of asylum seekers and refugees (numbers of which have risen considerably since the invasion of Ukraine); and an extremely overburdened health system are all stark reflections of the state's lack of progress in meeting the SDGS.

It is important that these events must not be used as rationale for the lack in sufficient progress on the SDGs to date. The state has and will always have obligations towards humanitarian aid, and delivering effectively on this is within the state's capacity. Separately, the state must plan for and address domestic matters. While we commend elements of the state's response to both the invasion of Ukraine and Covid-19, advance preparedness can in the future help mitigate the potential social unrest that can accompany reactionary planning, a situation that we are witnessing unfold in Ireland. Good governance in policy making, clear communication, and a commitment to developing public understanding will enable progress without issues being conflated and contributing to social unrest (for example conflating the issue of housing with our responsibility to refugees and asylum seekers).

The SDGs offer a framework for proofing both incoming and existing policies to assess whether they are leaving anyone behind. However this is not happening systematically across government, and this is evident in both the Department of Social Protection and the Department of Rural and Community Development.

The result is that poverty levels remain stubbornly persistent across a number of demographics. Lone parents, people living with disabilities, refugees, migrants, Travellers, and Roma people are all either vulnerable to poverty, or already living in poverty. Child poverty remains high, with almost a

third of those in poverty under the age of 18ⁱ - a number that doesn't include children in Direct Provision.ⁱⁱ In addition, children and young people in Direct Provision were excluded from the double child benefit in Budget 2023, despite the cost of living crisis,ⁱⁱⁱ and despite child benefit being a 'universal' payment in Ireland, many Roma children are not entitled to it.^{iv} According to the National Roma Needs Assessment, nearly half of Roma households with children were unsuccessful in their application for social protection payments including child benefit.^v

Research by the ESRI shows that the two groups at the highest risk of poverty are people with disabilities and lone parents.^{vi} Ireland has the highest rate of people with disabilities at risk of poverty in Western Europe.^{vii} One in ten older people lives in relative poverty, while lone parents have the highest deprivation rate of any demographic at 45.4%,^{viii} and there is overlap of course as some lone parents have disabilities. Additional research by the ESRI and IHREC shows that when all other factors are equal, people with disabilities are twice as likely to experience discrimination as people without disabilities.^{ix}

The UN Convention on the Rights of the Child is clear about the right children have to education. However, in Ireland, a person's socioeconomic background is still a major determinant of their educational attainment. A person is almost three times more likely to go on to higher education if their parents have a higher education than someone whose parents have not completed primary-level education.^x

Living on a low income can also prevent children and young people from participating fully in education. The costs associated with returning to school increase financial pressures impacting food, energy, and healthcare costs impacting health outcomes and are also a barrier to children attending school at both primary and secondary levels.^{xi} The Programme for Government commitment, as well as measures in Budget 2023, will help to address this burden, but the scope of the measures needs to be expanded and to include secondary-level students. Early school leavers are disproportionately represented by those who have experienced poverty and are three times more likely to be unemployed than others aged 18-24 who are not early school leavers.^{xii}

Poverty impacts individuals, families and communities. While targeted budgetary support between 2016-21 has helped to reduce poverty levels to close to those before the economic crisis, the absence of sustained and adequate support continues to leave people and communities vulnerable. Recent data also shows that poverty levels again increase with enforced deprivation increasing from 13.8% in 2021 to 17.1% in 2022.^{xiii} There is increasing evidence of deepening poverty levels and an unacceptable dependence on foodbanks.^{xiv}

The last three budgets have been described as regressive,^{xv} with the higher paid in Ireland benefiting more than those on social welfare. This is consistent with an overall economic trend, where there are small nominal increases in welfare alongside more pronounced increases in earnings and reductions in income taxation. These trends are likely to widen income divides and push poverty upwards, increasing the 'rich-poor gap'.^{xvi} Recent research shows that for every \$100 (€93) of wealth generated in Ireland, a third has gone to the richest 1%, while less than 50c has gone to the poorest 50%.^{xvii}

Additionally, we wish to point out that Travellers experience significant levels of energy poverty, and are largely still dependent on the burning of fossil fuels.^{xviii} Traveller families in trailers are also excluded from access to retrofitting grants.^{xix} Current policies and structures make it difficult for Travellers and Roma to switch to using low-emission mobility. For example, Traveller-specific accommodation is typically located outside of city centres, near high-speed national roads where there is a lack of public transport links, as well as walking and cycling infrastructure.^{xx}

Any emission reduction targets for the residential sector must prioritise policies that also result in a radical reduction in energy deprivation. However, a key obstacle is that data on energy poverty and

deprivation is not currently measured or reported by the government. This should be addressed as a matter of urgency.

Alongside increases in social welfare payments and the fuel allowance, wider accessibility to government retrofitting schemes, grants, loan schemes or other models of financing retrofit are needed..^{xxi}

On a positive note, people whose earning ability was restricted by the pandemic were provided with a social welfare rate that was considerably higher than the standard. Access to healthcare was provided on the basis of need, rather than ability to pay, and the Government essentially nationalised private hospitals to ensure that appropriate, socially-distanced, space was available when required. This is the type of policy approach required to achieve the SDGs.

It is clear that the work of many departments intersects to create particular outcomes relevant to the work of both the Department of Social Protection and the Department of Rural and Community Development. A renewed commitment to interdepartmental working is evidently required in order to achieve the SDGs; specific targets of which are the direct responsibility of both the DSP and DCRD.

Departmental lead for specific SDG targets

Every department has an important role to play in the delivery of the Sustainable Development Goals despite the challenges that may arise in Irish society. However in order to increase accountability for SDG achievement, each department has been given a specific responsibility for the achievement of particular SDG targets. That said, due to the integrated, interdependent and indivisible nature of the SDGs, it is likely that both the Department of Social Protection (DSP) and the Department of Rural and Community Development (DRCD) will need to work with other departments in order to ensure the targets for which they are accountable are achieved, and this in turn increases Policy Coherence for Sustainable Development (PCSD).

The Department of Social Protection is the lead for achieving the following targets:

1. Target 1.2: By 2030, reduce at least by half the proportion of men, women and children of all ages living in poverty in all its dimensions according to national definitions
2. Target 1.3: Implement nationally appropriate social protection systems and measures for all, including floors, and by 2030 achieve substantial coverage of the poor and the vulnerable
3. Target 8.6: By 2020, substantially reduce the proportion of youth not in employment, education or training
4. Target 10.1: By 2030, progressively achieve and sustain income growth of the bottom 40 per cent of the population at a rate higher than the national average
5. Target 17.17: Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships

The Department of Rural and Community Development is the lead for achieving the following targets:

1. Target 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels
2. Target 17.17: Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships

Statements of Strategy

There is no doubt that there has been an effort to bring the SDGs into the work of both departments, as a commitment to Agenda 2030 is part of each department's Statement of Strategy which, it should be noted, were written before the publication of the current National Implementation Plan for the SDGs.

In the Department of Social Protection's current Statement of Strategy, the SDGs could not be understood to frame the strategy, as they are briefly mentioned just twice under Strategic Objective 1.

With regards to the Department of Rural and Community Development, there is a commitment to "Align our policies with the specific goals and the targets in the Implementation Plan by placing the SDGs at the heart of our policies", however if this is meant to infer that the SDGs operate as the fulcrum for the policy, this is not evident in the policies listed including the Rural Development Policy, the National Social Enterprise Policy, the strategy for Sustainable, Inclusive and Empowered Communities, and the national Volunteering Strategy.

In the Rural Development Policy, policies are mapped to the SDGs, but they are not clearly employed as a tool for policy-making.

In the National Social Enterprise Policy, the SDGs are mentioned, but they could in no way be interpreted to constitute 'the heart' of the policy.

In this the National Volunteering Strategy, it is noted that the "SDGs have been mapped to each individual Strategic Objective to demonstrate this link." It is our strong view that it is not enough to map policies to the SDGs, and so a 'link' is not sufficient. Rather, the SDGs must be viewed as the national framework for policy-making at all levels of government if we are serious about leaving no one behind, and reaching the furthest behind first.

The strategy for Sustainable, Inclusive and Empowered Communities goes further, stating that "The SDGs will provide an important frame of reference for this strategy" and "Our ambition is a cultural shift in how decisions are made." This level of ambition is commendable.

However, there are a number of SDG-related actions that for the 2019-2024 strategy under Objective 8 which were listed as 'short-term' and we would welcome input on the progress of these actions; especially considering that they echo actions in the 2022-2024 National Implementation Plan for the SDGs.

As per the Plan published in 2022, all Departments must include a commitment to Agenda 2030 in all new Statements of Strategy (Action 11a) and so this must be carried out for the next Statement of Strategy for both the DSP and DRCRD.

Update on SDG implementation actions

The following actions were committed to by the DCRD. Objective 8 in Strategy for Sustainable, Inclusive and Empowered Communities commits to:

- 8.1: Developing a programme to implement and raise awareness of SDGs for Local Community Development Committees, local authorities, Government Departments and agencies, community and voluntary organisations and local development bodies.
- 8.2: Developing toolkits to develop and proof programmes and plans against SDGs.
- 8.3: Supporting capacity in community and voluntary organisations in relation to SDGs.
- 8.4: Providing supports, including funding, to all sectors to implement SDGs.

The timeline for achievement was ‘short-term’ in 2019.

Certain of these actions also find similarities in the National Volunteering Strategy 2021-2025, whereby Action 55 is to:

- Provide support for all VIOs to implement and raise awareness of the Sustainable Development Goals
- Develop toolkits to develop and proof plans against SDGs
- Support capacity in VIOs in relation to delivery of the SDGs.

These actions were listed as medium-term actions, and so we would welcome an update on their progress especially considering we are nearing the halfway point of this strategy.

Local, Community Engagement and Volunteering

The Department of Community and Rural Development has a particular role to play in facilitating local engagement for SDG delivery. There are actions committed to in the National Education for Sustainable Development Strategy relating to the integration of the SDGs and associated targets for SDG integration into the PPNs, LDCDs, LECPS, Community Wellbeing Statements and County Development Plans and we would welcome updates on these efforts.

The National Volunteering Strategy also commits to supporting capacity in VIOs in relation to delivery of the SDGs, and developing toolkits to develop and proof plans against SDGs. This ‘proofing’ of plans is exactly the kind of approach that is required for Policy Coherence for Sustainable Development and we would like to understand how DCRD how they are proofing policies as aforementioned.

The Department of Community and Rural Development must also work with DECC and the LGMA to raise the profile and understanding of the SDGs across public libraries, and must support with the development, launch and showcasing of an annual SDG week to be held in September in libraries across the country to mark the anniversary of Agenda 2030. This is a significant opportunity to increase public understanding of the importance of the SDGs and we would welcome articulation of plans for what is surely to be a large-scale effort.

Departmental Reporting at a Target Level on SDG Progress

As per the National Implementation Plan, all Departments must from now on include updates on SDG activities and progress including at the target level in Departmental Annual Reports (Action 12a).

In the 2021 report for the Department of Social Protection, we note that the SDGs are mentioned but no data is given at a target level. This is understandable given that this report was published prior to the release of the 2022-2024 National Implementation Plan, however given that we are now in 2023 and nearing the halfway point of the SDGs, we would hope to see a significant improvement on this in every report from 2022 to 2030.

In the 2021 report for the Department of Community and Rural Development, the inclusion of the following statement is laudable:

“A key commitment under the [2018-2020] SDG National Implementation Plan involves mainstreaming the SDGs across national policies, so that when relevant sectoral policies are developed or reviewed, Ireland’s commitments under the SDGs will be taken into account.”

This is the kind of commitment and attention to Policy Coherence for Sustainable Development that is required for the transformation to a system whereby those furthest behind are reached first.

SDG Points of Contact

As per the National Implementation Plan, each Department should ensure an SDG point of contact is made publicly available (Section 3.1.4) as this increases accountability for target achievement. We note that this is still missing for the Department of Rural and Community Development (listed as TBC but the email is provided. For the Department of Social Protection, a name is listed but there is no email address.

Policy design and the SDGs

It is also noted in the 2021 DCRD report that

“The policy commitments in Our Rural Future, the national rural development policy published by the Department of Rural and Community Development in March 2021, are linked directly to the SDGs. Each of the over 150 policy measures in Our Rural Future are aligned with one or more of the SDGs”.

This constitutes a *mapping* of policy commitments to SDGs *after* the policy commitments have been determined. This does not reflect the use of the SDGs as a tool to *frame* policies at the design stage. It is only the latter which will build policy coherence across all levels of government. This should be rectified in the development of future development policies, as Action 3 in the SDG National Implementation Plan states that “All new national policies to incorporate reference to relevant SDGs and targets, and reflect how the policy interacts with Agenda 2030”.

Going forward

It is our view that the SDGs must be the overarching lens through which policy is made in Ireland, at all levels of government. Policy initiatives are often lacking in the necessary ambition, such as in the planned housing output, or are not being implemented effectively, as in Sláintecare reforms, resulting in inadequate outcomes. If Ireland is going to reach those furthest behind first, a more systematic and effective approach to addressing poverty and social exclusion is required; an approach provided for by the SDGs.

The necessary measures should include: ensuring adequate incomes for all; the introduction of a persistent poverty metric; access to quality public services, with a focus on public delivery and moving away from the current emphasis on a private, market model; ensuring decent jobs for those who can work; and tackling discrimination in all its forms.

Marginalised communities need to have a meaningful collective voice in the policies that impact on them, but the decimation of local autonomous community development sector prior to 2010, and particularly the closure of the Community Development Programme, is having an ongoing detrimental impact and needs to be addressed^{xxiii}. The Pilot Community Development Programme introduced in 2021 is positive, but needs to be urgently expanded.

The SDGs are described by the UN as a ‘blueprint’, and so they must be used as such in Ireland. Using the SDGs as a tool for policy making rather than as a retrospective stamp would go some way towards preventing those most marginalised and vulnerable in our country and communities from being left behind. It may also help to mitigate the societal backlash that accompanies policies perceived as requiring disproportionate adjustment on the part of some cohorts in society. Long-

term effective planning using SDGs - and the aligned human rights – would frame policies so that they can enable a better response to emergencies and continued progress in other domains, leaving no one behind and reaching the furthest behind first.

Endnotes

ⁱ 2021 CSO SILC as mentioned in <https://www.socialjustice.ie/system/files/file-uploads/2022-10/2022-10-05%20SJI%20Poverty%20Focus%20October%202022%20PDF.pdf>

ⁱⁱ [Child Poverty Monitor 2022 A](#)

ⁱⁱⁱ <https://www.childrensrights.ie/resources/press-release-budget-2023-goes-further>

^{iv} This is due to the implementation of the right to reside (European Directive 2004/38) and the associated policy, Habitual Residence Condition, by the Department of Employment Affairs and Social Protection.

^v [UN Convention on the Rights of the Child - Ireland Joint Alternative Report by a Coalition of Traveller and Roma Organisations:](#)

^{vi} <https://www.esri.ie/news/decreasing-poverty-requires-a-mix-of-policy-measures-such-as-increasing-female-labour-force>

^{vii} https://www.disability-federation.ie/assets/files/pdf/dfi_prebudget_submission_to_dsp_for_budget_22_final.pdf

^{viii} <https://www.cso.ie/en/releasesandpublications/ep/p-silced/surveyonincomeandlivingconditionssilc-enforceddeprivation2022/>

^{ix} <https://www.esri.ie/news/new-esri-ihrec-research-shows-people-with-disabilities-much-more-likely-to-experience>

^x https://www.childrensrights.ie/sites/default/files/submissions_reports/files/Chapter-1-Right-to-Education.pdf

^{xi} <https://www.irishtimes.com/ireland/education/2022/07/26/it-has-gone-beyond-crazy-large-majority-of-parents-worry-about-back-to-school-costs-amid-cost-of-living-crisis/>

^{xii}

[https://scholar.google.com/scholar?q=Evaluation+of+the+National+Youthreach+Programme%20%20+\(2019\)+Research+Series+Number+82.&hl=en&as_sdt=0&as_vis=1&oi=scholar](https://scholar.google.com/scholar?q=Evaluation+of+the+National+Youthreach+Programme%20%20+(2019)+Research+Series+Number+82.&hl=en&as_sdt=0&as_vis=1&oi=scholar)

^{xiii} [Survey on Income and Living Conditions \(SILC\): Enforced Deprivation 2022](#)

^{xiv} Barnardos 2023 <https://www.barnardos.ie/aldi>; EAPN Ireland 2022 <https://www.eapn.ie/wp-content/uploads/2022/11/Basic-Necessities-Final-Report-Double.pdf>

^{xv} <https://www.socialjustice.ie/publication/budget-2023-analysis>

^{xvi} <https://www.socialjustice.ie/publication/budget-2023-analysis>

^{xvii} <https://www.rte.ie/documents/news/2023/01/survival-of-the-richest-full-report.pdf>

^{xviii} https://www.ntmabs.org/publications/development/2019/nt-mabs-energy-report-factsheet_.pdf

^{xix} [Blockages to Retrofitting and Heat-pump Installation in Ireland](#)

^{xx} [Traveller Accommodation Programme 2019 – 2024 | Dublin City Council](#)

^{xxi} <https://ec.europa.eu/eurostat/en/web/products-eurostat-news/-/edn-20220211-1>

^{xxii} <https://ictu.ie/publications/downsizing-community-sector> and <https://comhlamh.org/wp-content/uploads/2018/10/9-Paper-on-the-Destruction-of-Community-Development.pdf>