

Submission to the Department of Social Protection National Child Poverty Target Public Consultation

January 2024



Founded in 1995, the Children's Rights Alliance unites over 150 members working together to make Ireland one of the best places in the world to be a child. We change the lives of all children in Ireland by making sure that their rights are respected and protected in our laws, policies and services.

Accompaniment Support Service for Children (A.S.S.C.)
Alcohol Action Ireland
Amnesty International Ireland
An Cosán
Anew
Anne Sullivan Foundation
Aoibhneas
Archways
AsIAM
Association of Occupational Therapists of Ireland (AOTI)
Association of Secondary Teachers Ireland (ASTI)
ATD Fourth World – Ireland Ltd
Atheist Ireland
Barnardos
Barretstown Camp
Bedford Row Family Project
BeLonG To Youth Services
Bodywhys
Catholic Guides of Ireland
Child Law Project
Childhood Development Initiative
Children in Hospital Ireland
Children's Books Ireland
Children's Grief Centre
Citywise Education
Clarecare
COPE Galway
Cork Life Centre
Cork Migrant Centre
Crann Centre
Crosscare
CyberSafeKids
Cycle Against Suicide
Dalkey School Project National School
Daughters of Charity Child and Family Service
Dental Health Foundation of Ireland
Department of Occupational Science and Occupational Therapy, UCC
Disability Federation of Ireland
Doras
Down Syndrome Ireland
Dublin Rape Crisis Centre
Dyslexia Association of Ireland
Dyspraxia/DCD Ireland
Early Childhood Ireland
Early Learning Initiative (National College of Ireland)
Educate Together
EPIC
Equality for Children
Extern Ireland
FamiliBase
Féach
Focus Ireland
Foróige
Gaeloideachas
Galway Traveller Movement
Good Shepherd Cork
Grow It Yourself
Helium Arts
Immigrant Council of Ireland
Inclusion Ireland
Institute of Guidance Counsellors
Irish Aftercare Network
Irish Association for Infant Mental Health
Irish Association of Social Workers
Irish Congress of Trade Unions (ICTU)
Irish Council for Civil Liberties (ICCL)
Irish Foster Care Association
Irish Girl Guides
Irish Heart Foundation
Irish National Teachers Organisation (INTO)
Irish Penal Reform Trust
Irish Primary Principals' Network
Irish Refugee Council
Irish Second Level Students' Union (ISSU)
Irish Society for the Prevention of Cruelty to Children
Irish Traveller Movement
Irish Youth Foundation
iScoil
Jigsaw
Katharine Howard Foundation
Kerry Diocesan Youth Service (KDYS)
Kids' Own Publishing Partnership
Kinship Care
Laois Domestic Abuse Services
Leap Ireland
Let's Grow Together! Infant and Childhood Partnerships CLG.
LGBT Ireland
Meath Women's Refuge & Support Services
Mecpaths
Mental Health Reform
Mercy Law Resource Centre
Migrant Rights Centre Ireland
Mothers' Union
Museum of Childhood Ireland
Music Generation
My Mind
My Project Minding You
National Childhood Network
National Council for the Blind of Ireland
National Forum of Family Resource Centres
National Parents Council Post Primary
National Parents Council Primary
National Youth Council of Ireland
New Directions
Novas
One Family
One in Four
Parents Plus
Pavee Point
Peter McVerry Trust
Prevention and Early Intervention Network
Psychological Society of Ireland
Rainbow Club Cork
Rainbows Ireland
Rape Crisis Network Ireland (RCNI)
Realt Beag/Ballyfermot Star
Respond Housing
SAFE Ireland
Saoirse Domestic Violence Services
SAOL Beag Children's Centre
School of Education UCD
Scouting Ireland
Sexual Violence Centre Cork
Simon Communities of Ireland
SIPTU
Social Care Ireland
Society of St. Vincent de Paul
SPHE Network
SpunOut.ie
St. Nicholas Montessori College
St. Nicholas Montessori Teachers' Association
St. Patrick's Mental Health Services
TASC
Teachers' Union of Ireland
Terenure College Rugby Football Club
The Ark, A Cultural Centre for Children
The Irish Red Cross
The Jack and Jill Children's Foundation
The UNESCO Child and Family Research Centre, NUI Galway
The Wheel
Transgender Equality Network Ireland
Traveller Visibility Group Ltd
Treoir
UNICEF Ireland
Variety – the Children's Charity of Ireland
Women's Aid
Young Ballymun
Young Social Innovators
Youth Advocate Programme Ireland (YAP)
Youth Work Ireland

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1. Introduction

The Children’s Rights Alliance unites over 150 members working together to make Ireland one of the best places in the world to be a child. We change the lives of all children by making sure their rights are respected and protected in our laws, policies and services. We also provide legal information and advice to children, young people and their families through our legal information line and nationwide legal advice outreach clinics.

The Alliance welcomes the opportunity to make a written submission to the Department of Social Protection on the setting of a new national Child Poverty Target. In this submission we respond to the questions set out in the consultation document.¹

Article 27 of the UN Committee on the Rights of the Child calls for every child to have the right to a standard of living that is adequate to their physical, mental, spiritual, moral and social development.² While parents and guardians have the primary responsibility to provide for the child’s material needs, the State also has the responsibility to assist parents and guardians to alleviate poverty where needed.³ The European Commission’s recommendation *Investing in Children* provides a roadmap of how to address child poverty through a range of lenses.⁴ It recommends tackling child poverty and social exclusion through integrated strategies encompassing not only children’s material security but also the promotion of equal opportunities.⁵ The Recommendation sets out a three-pillar approach which focuses on adequate resources, affordable quality services and the right to participate.⁶

Across all three measures, captured in the Survey on Income and Living Conditions, children have a higher rate of poverty compared to the rest of the population.⁷ When examined by age cohort, children have the highest rate of deprivation and consistent poverty and have the second highest at risk of poverty rate.⁸

The establishment of a dedicated Child Poverty and Wellbeing Unit at the Department of An Taoiseach in December 2022 was an important development in terms of driving cross-government action on child poverty from the top down.⁹ By setting a child poverty target, the Government can track progress on how policy responses to tackle disadvantage and social exclusion are impacting this cohort of the population.

1 Department of Social Protection, Child Poverty Target: Public Consultation Guidance Document, (DSP 2023).

2 UN Convention on the Rights of the Child (20 November 1989) 1577 UNTS 3 (UNCRC) Art 27.

3 UN Convention on the Rights of the Child (20 November 1989) 1577 UNTS 3 (UNCRC) Art 27.

4 European Commission, Commission Recommendation: Investing in children: breaking the cycle of disadvantage (Brussels, 20.2.2013 C(2013) 778 final)

5 European Commission, Commission Recommendation: Investing in children: breaking the cycle of disadvantage (Brussels, 20.2.2013 C(2013) 778 final)

6 European Commission, Commission Recommendation: Investing in children: breaking the cycle of disadvantage (Brussels, 20.2.2013 C(2013) 778 final)

7 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2022* (CSO 2023).

8 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2022* (CSO 2023).

9 Children’s Rights Alliance, ‘Child Poverty Unit is a gamechanger in the campaign to end child poverty in Ireland - say Children’s Rights Alliance’, Press Release 18 December 2022.

2. Response to the Consultation Questions

Question 1: Does consistent poverty remain the most appropriate basis for a national child poverty target or are there other indicators that could be considered?

Consistent poverty would be the most appropriate basis for a national child poverty target.

The Survey on Income and Living Conditions (SILC) provides important data on the proportion of the population living 'at risk of' poverty, experiencing deprivation, and in consistent poverty by collecting data on households' income and living conditions.¹⁰

The table below provides details of the trends in these three measures over 2020 to 2022 for children (0-17 year-olds). The data shows that across all three measures child poverty has increased in 2022 when compared to 2021.

Child Poverty Statistics (0–17 year-olds) – 2020 to 2022

	SILC 2020	SILC 2021	SILC 2022
At risk of poverty	16.4	13.6	15.2
Deprivation	14.3	17.0	19.9
Consistent Poverty	4.7	5.2	7.5

Source: CSO Survey on Income and Living Conditions, 2020, 2021 and 2022.

Using consistent poverty to track and monitor the number of children living in poverty in Ireland provides a robust measure that combines both the proportion of the population who have an income below 60 per cent of the national median as well as experiencing deprivation.¹¹ As the table above notes, the past three years have seen a gradual increase in the percentage of children living in consistent poverty. Children are the age cohort most vulnerable to consistent poverty, with a rate of 7.5 per cent versus an overall population rate of 5.3 per cent in 2022.¹²

SILC provides a measure of households' experience of deprivation, i.e. the proportion unable to afford a set of 11 goods and services which are considered the norm for society.¹³ However, this measure provides no detail about the income available to households and their position in terms of overall income distribution.

The 'at risk of poverty' rate describes the proportion of the population who have an income below 60 per cent of the national median income.¹⁴ However, this measure only focuses on income and not on what basic goods and services households can afford to purchase.

10 Central Statistics Office, *Survey on Income and Living Conditions Explained* <https://bit.ly/3u4QXGj> accessed 30 January 2024.

11 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2022 Background Notes* (CSO 2023) <https://bit.ly/3u3lcwd> accessed 31 January 2024 .

12 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2022* (CSO 2023).

13 Central Statistics Office, *Survey on Income and Living Conditions 2022, Background Notes* <https://bit.ly/3u3lcwd> accessed 30 January 2024.

14 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2022* (CSO 2023).

Recommendation:

- Retain the use of the consistent poverty measure to track progress on a national child poverty target.

Question 2: Is it feasible to set sub-targets within the child population (e.g. for specific cohorts or groups), which can then be monitored?

The setting of sub-targets could help to reach cohorts of children exposed to a greater risk and incidence of poverty. This includes children living in one parent families or in households where an adult has a disability or illness.

Data from SILC highlights that children living in households headed by a lone parent are significantly more vulnerable to consistent poverty at a rate of 14.1 per cent compared to 5.3 per cent of two parent families.¹⁵ Furthermore, the inability of a mother to work due to disability or illness has been identified as a strong predictor of economic vulnerability.¹⁶ The latest SILC figures show an at risk of poverty rate of 35.2 per cent for those unable to work due to illness.¹⁷

The Growing Up in Ireland research has found higher incidences of chronic illness and disability among children from lower socio-economic backgrounds with greater numbers of children being described as 'severely hampered in daily activities'.¹⁸ The primary carer of a child with a disability is less likely to participate in the labour market especially if the child's disability is more limiting.¹⁹ Higher rates of poverty are reported in 2022 for individuals with self-reported chronic illness over the age of 16 years of age.²⁰

While household-based surveys provide a valuable opportunity to capture data on poverty and deprivation, by its very nature this type of survey does not disaggregate information on some of the most vulnerable and excluded groups of children, many of whom are living in poverty.

These groups include:

- Traveller children
- Children of asylum seekers living in direct provision centres
- Children living in homeless accommodation
- Children in the youth justice detention system
- Children in residential state care (for reasons of care or disability)

Research from the EU Fundamental Rights Agency found that 38 per cent of Traveller and Roma families experienced difficulties in making ends meet in 2018.²¹

The development of a 'child poverty dashboard' could provide a supporting monitoring mechanism alongside the consistent poverty rate to capture aspects requiring further attention.²²

15 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2022* (CSO 2023).

16 Bertrand Maitre, Helen Russell, and Emer Smyth *The Dynamics of Child Poverty Evidence from the Growing Up in Ireland Survey* (ESRI 2021).

17 Central Statistics Office, *Survey on Income and Living Conditions (SILC) 2022* (CSO 2023).

18 ESRI, *Growing up in Ireland: Key findings No 4 the health of 9 year olds*, (ESRI 2009).

19 John Cullinan, 'The Economic Costs of Disability for Families' (Frontline Magazine 201) 5).

20 CSO, *Poverty Indicators by Health Status – Survey on Income and Living Conditions (SILC) 2022*, (CSO 2023).

21 European Agency for Fundamental Rights, 'Roma and Travellers in six countries' (European Agency for Fundamental Rights) <<https://bit.ly/3zDz4yx>> accessed 15 June 2022, 73.

22 Society of St Vincent de Paul, *Child Poverty Target Consultation*, (SVP 2024).

Recommendations:

- Set child poverty sub-targets that address the incidence and risk of poverty for certain cohorts of the child population.
- Establish a child poverty dashboard to support the tracking of progress against the consistent child poverty rate.

Question 3: Should the target be set on an absolute (number of children) or rate (per cent) basis, or both?

The target should be based on a rate or percentage of children living in consistent poverty as opposed to an absolute number. This will allow for a more stable approach to monitoring the target and ensure there is no lack of clarity due to population changes.

Recommendation:

- Set a child poverty target based on a rate (per cent) to allow for more accurate monitoring over time.

Question 4: What is the most appropriate timeframe for the target?

The time frame for the achievement of the target should be 2028.

The timeframe for the target should align with the recently published *Young Ireland: the National Policy Framework for Children and Young People (0-24) 2023-2028*.²³ The Policy Framework spotlights the issue of child poverty and the scope of tackling the issue is outlined in the initial programme plan of the Child Poverty and Wellbeing Unit based at the Department of An Taoiseach, *From Poverty to Potential: A Programme Plan for Child Well-being 2023-2025*.²⁴

The timeline for this latter plan presents the opportunity to reflect on what has been achieved at the mid-point of the target.

Recommendation:

- Align the timeframe of the target to the lifetime of the current children and young people's policy framework.

Question 5: Are there specific actions required related to meeting the target?

A mix of accountability mechanisms and policy responses are required to end child poverty, and these could be considered when developing the new child poverty target.

Specifically, the following issues require deliberation:

- *Ownership of the target*: which Minister or Department is responsible for ensuring delivery of the target?
- *Home of the target*: Should the target be brought into law, as was done in the UK?

²³ Government of Ireland, *Young Ireland: the National Policy Framework for Children and Young People (0-24) 2023-2028* (DCEDIY 2023).

²⁴ Government of Ireland, *From Poverty to Potential: A Programme Plan for Child Well-being 2023-2025* (Department of An Taoiseach 2023).

- *Cross-departmental working*: what mechanisms are required to deliver on the cross-departmental elements of the target and how can existing structures, such as the Child Poverty and Wellbeing Unit at the Department of Taoiseach, be built upon?

Drawing on international best practices, a commitment in legislation through a Child Poverty Reduction Act would provide a sharp policy focus and political accountability.²⁵ As part of the accountability mechanisms enshrined in legislation in New Zealand, the government is required to report on progress to address child poverty on budget day. Similar action could be undertaken as part of the series of papers published on Budget Day by the Departments of Finance and Public Expenditure and Reform. As is the case in New Zealand the report should also comment on the implications of the Budget measures on the child poverty target

Recommendations

- Establish systems of accountability and reporting at Cabinet and Oireachtas level in order to oversee the implementation of actions to reduce child poverty.
- Leverage learning from the comprehensive approaches to reducing child poverty legislation in Scotland and New Zealand by putting the reduction of child poverty on a legislative basis.

²⁵ Society of St Vincent de Paul, *Investing in measures to end poverty. SVP Election 2020 Priorities* (SVP 2020) <<https://bit.ly/3kJE362>> accessed 26 September 2020.