

Equality Now Invest in Women

National Women's Council of Ireland Pre-Budget Submission 2020

NWCI BUDGET PRIORITIES

The Gender Equality Framework	Department
Publish Gender Equality Impact Statement with Budget 2020	DPER
Restore funding to the women's community sector	DJE
Increase Funding to NWCI	DJE
Tackle Economic Vulnerability and Poverty	
Restore income disregards to all categories of lone parents on OFP JST and JSA	
Allow lone parents to receive both the JST and WFP	
Reduce requirement for WFP for lone parents to 15hrs	DEASP
Exclude WFP from income assessment for differential rental schemes	
Establish Statutory Maintenance Agency	
Deliver Homes & Housing	
Increase public housing capital budgets	
Provide resources to gender proof all homeless and social housing strategies and budgets	DHPLG
Introduce a minimum 5 year tenant protection-lease length	
Establish a statutory Traveller Agency	
Develop Women's Health Services	
Resource the Women's Health Action Plan	
Allocate €23m for abortion care for hospital and community based services	DOH, HSE
Restore resources including staffing for the Maternity Strategy	
Eliminate Violence Against Women	
Ring fence funding for specialised support services	
Provide Refuge Spaces at the legally required levels of the Istanbul Convention	DYCA
Ring fence resources for An Garda Síochána (AGS) to complete nationwide DPSUs cover	DJE
Allocate funding for establishment of Domestic Homicide Reviews	DJE, DOH, DYCA
Allocate resources for third level initiatives	
Allocate resources for third level illitiatives	DES
Resource DEASP to legislate and introduce 5 Days paid leave for survivors VAW violence	DEASP
	BLASI
Value Care	
Develop a model of funding the sector that ensures proper wages for the workforce and	
affordable fees for families	DYCA
Ensure Lone Parents are not negatively impacted by National Childcare Scheme	
Restore Carers Allowance and Carers Benefit to 2009 rates (minimum)	DOH
Resource 4 months' paid parental leave & paid paternity leave to 1 month	
Resource 6 paid days of carers' leave	DEASP
Support gender sensitive pension reform	
Initiate the introduction of universal State pension	
End tax reliefs on private pensions	
Deliver a full Homecarers credit	DEASP
Ensure TCA is limited to 30 years for maximum pension	
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Introduction

Established in 1973, the National Women's Council of Ireland (NWCI) is the leading national women's membership organisation in Ireland. NWCI seeks full equality between men and women and we draw our mandate from a membership of over 180 groups and organisations across a diversity of backgrounds, sectors and locations. We also have a growing, committed individual membership.

NWCI actively supports and works with government to implement the aims of the National Strategy for Women and Girls (NSWG) and to develop an integrated and focussed programme of gender aware and gender proofed investment. It is important this vision is also aligned to UN sustainable Development Goals (SDG) and the UN Convention for the Elimination of Discrimination against Women (CEDAW) recommendations to Ireland, as well as other UN convention recommendations.

NWCI welcomes the announcement of a Citizens' Assembly on gender equality and will participate in all aspects of its work. Global research has proven that the fastest way to tackle persistent gender inequalities & discriminations for women is sustained investment in public services and social infrastructure. This will mitigate historical & ongoing economic inequality, address unpaid and undervalued care labour, and provide protective and legal services to combat endemic violence against women.

Economic Overview

Investment in Ireland is recovering, and after years of severe cuts it will be a projected €8.4bn in 2019. NWCI believes that a core economic priority of Budget 2020 must be continuing this investment in public services and social infrastructure. Ireland has a devastating housing crisis, a two tier, struggling health system, underdeveloped care provision and over 40% of people would be living in poverty without our social welfare system1. There is clear evidence that preventative social investment will create future savings and, crucially, reduce present injustice and inequality. Lack of investment will inevitably keep, or transfer back, personal, health and community care needs to the unpaid, undervalued and often invisible labour of women.

We welcome the increase in the level of employment, closest to its highest level ever. However, we are not approaching what could reasonably be called 'full employment' as women's participation rates remain low and many women are underemployed. Workers represent 14.3% of all those in poverty² and it is clear that not all employment in Ireland guarantees income security. Our submission to DEASP addresses this gender inequality and makes recommendations to address the consequences, please see NWCI DEASP submission for further details.

Ireland has become the second country in the world to declare a climate and biodiversity emergency. International research has established that as these climate impacts increase, existing inequalities, deprivation and exclusion will be worsened, with the worst impacts on women³. Budget 2020 must lay the foundations for a low-carbon future and establish climate action, targeting emissions and protection of biodiversity as a normative lens for analysing both expenditure

¹ 2017 figure

² SJI Poverty in Focus 2019

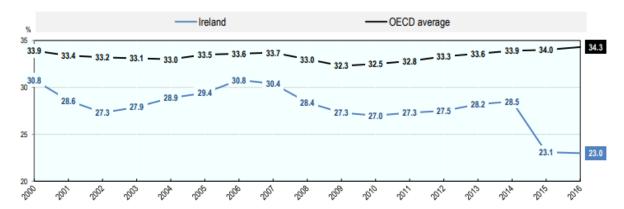
³ European parliament-The Gender Dimension of Climate Justice 2015

outcomes and revenue raising targets. Our transition must be a just transition and all measures must incorporate mitigation and climate justice investments to ensure rural communities, households experiencing energy poverty or lower socio-economic groups do not experience further inequality and poverty.

Taxation

Tax plays a key role in shaping Irish society through funding public services, supporting economic activity and progressively redistributing resources.

NWCI calls on government to maintain at least a 2:1 split between public spending increases and tax reductions. There is no need for tax reductions as Ireland already has a low tax-take as a proportion of national income, continuing to be below the EU average. Budget 2020 should focus instead on increasing taxation, broadening the tax base in a fair and equitable manner, towards the EU average and utilising all available resources to deliver the public services and social infrastructure Irish people aspire to having.



Tax-to-GDP ratio compared to the OECD

NWCI rejects increasing the threshold at which people enter the high tax rate. Women predominate in low paid, part-time jobs and take time out of work to undertake unpaid care responsibilities; therefor they benefit substantially less from cuts to income tax and especially to reforms aimed at higher rate tax payers.

NWCI Recommends

NWCI believes the tax base can be broadened in a sustainable and gender sensitive way by:

• Measures related to corporate tax base

Aware of the general tax harmonisation agenda in both the EU CCCTB process and the OCED Base Erosion and Profit sharing⁶, NWCI believes that Ireland needs to refocus the role low corporate rates play in Ireland's overall economic strategy. Measures should be introduced for a progressive overall increase in corporate taxes towards the effective EU average and government must reduce reliance on windfall corporation tax receipts that has built up in recent years. The introduction of a minimum

⁴ https://www.oecd.org/tax/revenue-statistics-ireland.pdf

⁵ As recommended in the 2019 European Semester: Country Report - Ireland

 $^{^6\} https://www.oxfamireland.org/sites/default/files/upload/pdfs/mantras-myths-final.pdf$

effective corporate tax rate would also serve as an opportunity for Ireland to take a leadership role in implementing progressive moves

Reform Tax reliefs

Make all discretionary tax reliefs/expenditures available only at the standard 20% rate. It is unjust that people on higher incomes should be able to claim certain tax reliefs at the top marginal income tax rate.

The State spends approximately €2.39 billion per annum in private pension tax relief. In 2014, 72% of pension tax relief went to the top 20% of earners and 5% of the population are getting 50% of the tax relief. This current tax based incentive system for pension savings is regressive. As women tend to be lower earners, these tax reliefs also widen rather than narrow the gender pension gap. The public monies saved should be reinvested in first tier State pensions and a universal pension.

Reduction in and exemptions from VAT

Women are worst affected by consumer taxes, with worst impacts on the poorest. In Budget 2012 the increase from 21% to 23% resulted in the poorest decile paying 30.64% of overall income in VAT compared to only 5.7% for the highest decile⁸. Decreases and /or other changes in VAT must be assessed for a progressive impact on the most vulnerable.

Financial transaction tax

A financial transaction tax (FTT) should be introduced to provide additional revenue for delivery of services which have been cut back over the last decade. Research suggests that an FTT discourages speculative finance whilst simultaneously generating revenue for investment in social infrastructure. Ireland should support calls for a progressive European FTT also.

Environmental taxation measures

A Just Transition Fund should be established which can be funded by increases in environmental-based excise charges and also by increasing the carbon tax.

- Increase polluter pays' tax policies to motivate corporate responsibility and repair the damage caused by corporations who have pursued profit at the expense of the environment.
- Remove fossil fuel subsidies and invest into decarbonisation policies

Gender Budgeting

NWCI works with the Dept. of Public Expenditure & Reform (DPER) on the Equality Budgeting Expert Advisory group to advance the integration of gender (and progressively other equality budgeting processes) into the annual budget process and the delivery of public services.

A Gender Equality Impact Statement published alongside Budget 2020 should be the next step in this process. It should include a comprehensive gender analysis of the already committed capital and current expenditure, budget day expenditures and the overall fiscal strategy. This should also include analysis of revenue and income transfers and macro-level budgetary decisions in order to avoid excluding important issues which affect gender equality⁹

⁷ Collins, M.L. & Hughes, G. Supporting Pensions Contributions through the tax system. IEA Conference 2017

⁸ Collins, M Distributive Effects of Recent VAT Changes NERI 2015

⁹ PBO Briefing paper 4 2018

NWCI fully supports the recommendation of the 2018 Budgetary Oversight Committee that consideration be given to placing equality budgeting on a statutory basis in Ireland and Budget 2020 is an opportunity to affirm commitment to this being progressively achieved.

NWCI Recommends

- Minister publishes a Gender Equality Impact statement with Budget 2020
- Dept. of Finance & Public Expenditure and Dept. Of Justice & Equality establish a training fund for resources and staffing to support
 - -cross dept. training on gender budgeting implementation
 - -development of disaggregated data collection and analysis
 - -development of expertise in the Parliamentary Budgetary Office to analyse and support Gender & Equality Budgeting work
- Dept. of Finance and Public Expenditure & Reform to ensure that all major capital infrastructure investment has been gender impact assessed, including a gender audit of all major transport initiatives
- Funding is provided to support NWCI & other civil society originations to meaningfully engage with equality budgeting work as recommended by the OECD and UN

The Gender Equality Framework

Women's Leadership and Participation

From 2008 - 2014, there was a reduction in government spending on the community and voluntary sector from 53.4B to 49.6B. In 2008-15 there was a 31% decrease in workers in the Community and Voluntary sector. NWCI notes the availability of funding for Women's Sheds, however we call for reinvestment that is particularly focussed on community development work with its social inclusion, anti-poverty and justice framework & intentionality. Further, NWCI highlights that effective climate action will require the strong local participatory democracy and redevelopment, which local women's organisations can enable women to participate in at all levels of public life.

Women's leadership in a range of sectors is poor. NWCI welcomes the work of the Gender Equality Taskforce in Higher Education and calls for ringfenced funding for the 45 planned gender-specific professorships to address the fact that only 1% of full professorships are held by women.

At the national level there should be increased funding for NWCI, recognised by Government as a key body advocating on women's concerns and perspectives, to continue to advance women's equality.

NWCI calls on the government to ensure that the current reorganisation of the Dept. of Justice & Equality does not undermine structures and processes that have underpinned high level gender equality work over the last decade. Resources currently dedicated to the Gender Equality Unit and Cosc, the National Office for the Prevention of Domestic, Sexual and Gender-based Violence must be protected and utilised for similar purposes in new structures.

NWCI Recommends

- Increase funding to NWCI to support the achievement of full equality for women
- Restore funding to the women's community sector to pre 2009 level (adjusted for inflation)
- Ringfence Dept. Ed. & Skills funding for 45 planned gender-specific professorships
- Ringfence resources in Dept. of Justice & Equality that is dedicated to gender equality & gender based violence in new dept. structures

Tackle Economic Vulnerability and Poverty

NWCI has made a separate submission to Department of Employment Affairs and Social Protection (DEASP) focused on recommendations to enhance women's economic independence through labour market participation and the role of the social welfare income support system to reduce income poverty and inequality. The following section outlines the main points of that submission, please see the submission for full detail.

Lone parents (84% are women) in Ireland are almost 5 times more likely to experience in-work poverty than other households with children. 84% of lone parents in Ireland were unable to meet unexpected expenses and almost 60% of lone parents reported that they could not access childcare services due to cost. In terms of purchasing power, lone parents in Ireland have the fourth lowest household income among EU-15 countries. While the household income of the general population in Ireland has recovered to pre-crisis levels, the income of one parent households was lower in 2017 than in 2007.¹⁰ ¹¹

NWCI Recommends

Reinforce commitments to reducing deprivation and child poverty levels, particularly in lone parent families as a priority in Budget 2020.

- Restore value of income disregards to all categories of lone parents on OFP, JST to €165pw
- Increase the income disregards for lone parents on OFP & JST to support take up of increased working hours
- Reduce the hours requirement for the WFP for lone parents to 15 hours per week
- Allow lone parents to receive JST & WFP. Extend cut off for the JST until youngest child is 18
- Ensure lone parents on JST have access to SUSI grants for part-time study
- Exclude the WFP from the income assessment for the Differential Rent Scheme across LAs
- Introduce comprehensive financial support to cover the full costs of attending a training course, including childcare and transport

Establish and resource a Statutory Maintenance Authority

Workers represent 14.3% of all those in poverty.¹² Women make up a higher percentage of the low paid in Ireland, being 60% of minimum wage workers, and 50% of women workers earned less than 20,000pa in 2016. Women dominated employment sectors have been subject to aggressive casualisation and the erosion of pay and security. Research from the US and across the EU shows

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 $^{^{10}}$ Society of St. Vincent de Paul (2019) Working Parenting and Struggling

¹¹ Research from Europe shows that this pattern is not unique to Ireland & and that increases in the labour market attachment of lone parents does not necessarily reduce their poverty risk. (Jaehrling, K., Kalina, T. and Mesaros, L. (2015) 'A paradox of activation strategies: Social Politics, Vol. 22

Social Politics, Vol 22
¹² SJI Poverty in Focus 2019

that collective bargaining mechanisms are critical to closing the gender pay gap¹³ and the state should publicly support the development of these instruments in these female dominated sectors.

NWCI Recommends

- Gender-proof new labour activation initiatives and review their gender impact before scaling up
 - Ensure a gender sensitive monitoring of activation initiatives
 - Ensure no-one required to accept insecure, non-fixed hour jobs as 'reasonable offer of work'
 - Recognise atypical work patterns and calculate unemployment on hours per week
- Champion Quality, Decent work
 - State should publicly support collective bargaining instruments
 - Improve incomes at source by supporting raising wages, challenging precarious, low paid work
 - Attach social criteria, clauses and conditionality to Employer incentive schemes
 - Ensure government procurement processes to proactively ensure living wage social clauses in key sectoral procurement processes in female dominated sectors.
- Actively champion an increase in Minimum Wage to Living Wage levels and a Low Pay Commission focus on In-Work poverty
- DEASP & DCYA work together to ensure the National Childcare Scheme supports women to return to learning, training and work with a particular focus on the needs of lone parents

Deliver Homes & Housing

The housing and homelessness emergency continues to have a devastating impact on women and families throughout Ireland. Female homelessness is at its highest, 2,600 women are now homeless and Ireland now has the highest rate of female homelessness in the EU. Rebuilding Ireland has no formal gendered analysis of homelessness policy, no gendered disaggregation of homeless data or public housing waiting lists, and no gender proofing of policy or practice¹⁴. A formal requirement to do so must be introduced immediately.

Lone parent families, the majority of whom are headed by women, are the highest proportion of families living in emergency accommodation, the vast majority having been made homeless from the private rental sector. The use of family hubs has normalised family homelessness, which will lead to families being institutionalised and Ireland once again punishing women and children for poverty and inequality.

The current statistics do not provide an accurate picture of female homelessness as women living in refuge accommodation and direct provision are not included. In addition women with children are more likely to move around, staying with family and friends than going to homeless accommodation in the early stages of homelessness. Traveller families forced to live on roadsides are also excluded from official statistics.

NWCI, alongside our partners in Raise the Roof, the national campaign to bring an end to the housing and homeless emergency call for a no eviction policy while the emergency continues and a

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¹³ The Gender Wage Gap:Blau Kahn (2016) IZA

¹⁴ Murphy M 2017 Advancing human rights and equality proofing in Ireland

commitment and investment in a public housing model that focuses on building sustainable communities. A statutory Traveller Agency with powers to approve and enforce Local Authority 5 year Traveller accommodation plans must be established urgently.

NWCI Recommends

Increase public and affordable housing

- Increase public housing capital budgets across local authorities and approved housing bodies
- Review tax measures to dis-incentivise land hoarding
- Develop an Irish model of affordable cost rental housing

• Provide resources to gender proof all homeless and housing strategies & budgets

Establish gender sensitive support services for women living in homelessness

Increase security of tenure

- Introduce legislation to prevent evictions
- Bring housing assistance supports fully into line with market rents
- Amend Part 4 Section 34 of the Private Rental Tenancies Act to ensure buy-to-let lords cannot utilise exemptions
- Introduce a minimum 5 year tenant protection/lease length of security for homeless HAP
- Tenancies
- Establish & fully resource a statutory Traveller Agency

Develop Women's Health Services

Women in Ireland have a higher life expectancy than men and carry a disproportionately larger burden of ill health later in their lives. Women have life experiences which have specific impacts on their health and their poor health is inextricably linked to inequality and poverty. Currently, inequity in access to public services exacerbates women's health inequalities. Financial control measures introduced in the HSE in 2019 appear to be resulting in a recruitment freeze and are impacting the roll-out of perinatal mental health services, and the implementation of the National Maternity Strategy.

Develop the Women's Health Action Plan

In partnership with the Dept. of Health and the HSE, NWCI is developing the framework to for the Women's Health Action Plan (WHAP). Budget 2020 must continue to resource the WHAP development process, particularly large-scale public consultation with women.

Reproductive & Maternal Healthcare

Abortion care is now a core element of reproductive health services. It is vital that the service is properly funded to ensure local access and that there is adequate staffing, equipment & training for primary and secondary healthcare providers. The HSE shall address as a matter of urgency the lack of abortion providers in some counties and maternity units.

In 2019, funding for new developments in the *National Maternity Strategy* were halted, this must be restored as a matter of urgency. It is important that the health budget provides for CervicalCheck measures, including: the ongoing payment of ex-gratia payments to women and families affected; establishment of the tribunal; roll-out of HPV vaccine for boys; and HPV testing.

Resource universal health services -Implement Sláintecare

Budget 2020 must intensify the progress to a single-tier health system, with a dedicated Sláintecare implementation funding stream, supported by multi-year budgeting increasing system capacity, expanding entitlements and reducing out-of-pocket payments. Sláintecare implementation must prioritise low-income and vulnerable groups including Traveller women, migrant women and women living in homelessness.

Focus on Women's Mental Health

The Department of Health's Healthy Ireland surveys have found women have lower levels of positive mental health compared to men. Statistically more women than men report mental health problems, more women than men engage in self-harm and women are also likely to attempt suicide.

Women can experience poor mental health during the perinatal period –funding is urgently required to staff the new teams and capital investment to develop a mother and baby unit for women who need to be admitted for inpatient mental health care, currently there is no such service available in Ireland.

NWCI Recommends

Women's Health Action Plan

- Allocate sufficient resources for ongoing 2019-20 development by DOH, HSE & NWCI
- Commit to year-on-year funding for implementation of WHAP in subsequent budgets
- Increase Healthy Ireland fund by €4m, with €2m of this specifically for women's health through local authorities

Reproductive & Maternal Healthcare

- Allocate €23m for abortion care for hospital and community based services, including:
 - Ensure provision of primary care abortion services in all counties and secondary abortion provision in all maternity units
 - Adequate resources for ongoing, fully accessible MyOptions supports & campaign
- Restore resources, including staffing for the Maternity Strategy
- Resource access to free contraception for all evidence-based contraception options
- Resource universal access to infertility services

Sláintecare

- Establish the National Health Fund
- Remove in-patient charges
- Further reduce prescription drug charges for medical card holders
- Implement Yr. 1 full funding for expanding entitlements and system capacity
- Implement a sustainable workforce strategy to ensure adequate numbers of appropriately qualified health care professionals are available to deliver Sláintecare

Women's Mental Health

- Allocate a minimum of 10% of 2020 health budget to mental health
- Develop women-centred community-based mental health services incl. counselling
- Develop women-only in-patient mental health services
- Develop perinatal mental health services including mother and baby in-patient unit

Eliminate Violence Against Women

NWCI welcomes the ratification of the Council of Europe Convention on Violence Against Women (Istanbul Convention). However, the essential resourcing of frontline services, the funding of specialised services and the supports for the collection of data on the incidence of violence against women, remains inadequate.

Invest in frontline services

Demand for frontline Violence Against Women (VAW) services is high and has continued to grow. However, only moderate increases are being provided in State-allocated funding from €22.1 million in 2017 to €23.8 million in 2018 to €25.3 in 2019¹⁵. Refuges and services funded by Tusla are not being provided with funding necessary to restore staff pay from 2008 levels. This is leading to high staff turnover and impacting severely on the women and children needing these services. Funding needs to reflect the substantial increase in demand for both support and preventative services.

Provide adequate refuge accommodation

The Council of Europe recommends that there should be a target by member states of at least 1 refuge place per 10,000 of population. With a total 2019 allocation of 155 spaces, consisting of 145 units in refuge accommodation and 10 in Safe Homes.¹⁶ This figure includes 9 units not available since 2017. Ireland is not close to meeting our legal minimum standards of 472 spaces.

Resource specialist Garda services

The continuing roll-out of Divisional Garda Protective Services Units (DPSUs) is very welcome. However, it is also clear that there continues to be insufficient Garda personnel and supervision at district level to meet the demands of Domestic Violence incidences appropriately.

Fund our understanding of VAW

The current timeline of the new national sexual violence survey means that we will not have any updated information until 2024 at the earliest. There is no current proposal to begin research on the extent of sexual violence among vulnerable minority groups: like Travellers, members of the LGBTQI, disabled and migrant communities. Government urgently needs to commit resources to reduce this timeframe. Resources must be allocated for the development of a model of multi-agency Domestic Homicide Reviews

Ring-fence resources for mandatory VAW training by specialist agencies

Dedicated funding must be ring-fenced within the budgets of relevant statutory services for staff to develop an understanding of the impact of abuse on women and children, the risk of the abuse continuing or escalating, and countering the responses of perpetrators. In particular, resources must be made available for training in recognising coercive control.

Ending Sexual Violence and Harassment in Third level Education (ESHTE)

With women between 18-25 being most at risk of sexual violence and over 30% of Irish women students reporting experiences of harassment, NWCI welcomes the dedicated funding made available in 2019 for third level specific initiatives. This will make a significant contribution to the

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¹⁵ Parliamentary Question – Dept. Children and Youth Affairs, Child and Family Agency Data, 21st May 2019.

¹⁶ TUSLA response to PQ May 2019

social & cultural transformation required to create a zero-tolerance society and the commitment must be continued in Budget 2020.

NWCI Recommends

Ringfence funding to combat violence against women

- Fund specialised support services
- Resource Free 24-hour helplines
- Resource psychological and legal counselling
- Provide resources for additional refuge spaces
- Ringfence resources for An Garda Síochána (AGS) to complete nationwide DPSUs cover
- Ringfence resources for multi-agency Domestic Homicide Reviews
- Allocate additional resources for improvement of data collection and information analysis services, including the rollout of the CSO study on sexual violence

Provide funding for mandatory VAW training for statutory services by specialist agencies

- Including trauma informed training in recognising and responding to coercive control crimes
- Allocate resources for third level initiatives
- Develop and resource a National Action Plan to end Female Genital Mutilation
- Continue Irish Aid programme funding to end violence against women globally
- Resource DEASP to legislate and introduce minimum 5 Days paid leave for survivors of sexual, domestic and gender-based violence

Value Care work and Support women's economic independence

NWCI welcomes the Council of the EU majority adoption of a Directive on work-life balance for parents and carers. Care work is essential to the common good and performs vital social and economic functions, it is neither prioritised nor sufficiently supported. However, Ireland's care policies and services for children, dependents, and older people, and statutory supports including maternity, paternity and parental leave provisions, lags behind many of our EU partners.

Women continue to provide the majority of unpaid care hours, 98% of those looking after the home/family were women in 2016.¹⁷ ¹⁸ 13.1% of those classified on home duties are poor and this group is disproportionately female.¹⁹

Quality Childcare and Early Childhood Education

Childcare remains the single most significant barrier to women's equal participation in all aspects of society, including employment. The provision of high quality affordable early childhood education and care (ECEC) is key to closing the gender pay gap. The link between quality ECEC and reducing disadvantage and poverty has also been well established. The National Childcare Scheme is welcome but early reports of inadequate funding leading to impacts on provision of services to babies and

¹⁷ CSO (2017) Women and Men in Ireland

 $^{^{\}rm 18}$ See Pension Section for NWCI recommendations on Homecare credit

¹⁹ SJI Poverty in Focus 2019

older children are of serious concern to NWCI. The 12-month review of the ACS should be gender & poverty proofed to ensure the most disadvantaged children and families are not penalised in their access to quality childcare by a disproportionate focus on parental labour market activation.

The ECEC sector has a significant sustainability crisis and is reliant on low wage and precarious employment contracts, including a dependence on summer month social welfare supports. As the sector is predominantly staffed by women this has the consequence of perpetuating negative gendered labour patterns. NWCI notes that the DYCA commissioned Crowe Horwath report on the cost of providing quality childcare in community and private setting is now significantly overdue and calls for it to be published urgently.

NWCI Recommends

- Incrementally increase investment in early years to bring overall expenditure in line with the UNICEF recommendation of 1% of GDP
- Develop a model of funding the sector that ensures proper wages for the workforce and affordable fees for families
- Monitor & Allocate resources to ensure no parent is negatively impacted by transition from Community Childcare Subvention Scheme to National Childcare Scheme
- Establish an initial budget line of €2million for the recommendations of the Childminding Working Group Reports

Family Care Provision

We welcome recent additional support in training, support and grants from DEASP. Homecare has been progressively privatised in Ireland to a largely unregulated home care industry, with high fees, varied quality and standards of homecare provision, and poor terms and conditions for workers. Domestic and personal care workers are often migrant women workers, and women of colour, subject to the most extreme instances of precarious work and exploitation. NWCI is particularly concerned that we must not become dependent on the exploitation of some of the most vulnerable women workers to meet our personal, familial and community care needs.

NWCI Recommends

- Increase Carer's Allowance and Carer's Benefit to 2009 levels (minimum)
- Increase the hours a carer can study/work while receiving a carer payment from 15 to 18.5 hours.
- Increase the earnings disregard for Carer's Allowance so that all those on average industrial incomes can qualify

Invest in work-life balance policies

There is a distinct failure of the Irish social security system to recognise care work - a person is deemed to be a new entrant if they have not contributed to the social insurance system for the previous two years. Those that may wish to combine care work with part-time waged work, predominantly women, find that they are not eligible for social welfare payments (i.e. Jobseekers

Allowance), are not registered as unemployed and are, therefore, discriminated against in terms of welfare income and opportunities to participate in training programmes.

Parental Leave

NWCI acknowledge the introduction of paid parental leave for a period of two weeks that is planned to extend on a phased basis over time. Budget 2020 should further resource the progressive introduction of this leave. NWCI recommends that the provisions of the Act give one-parent families the same leave entitlements as two-parent families to transfer part of the leave to other designated persons.

Paternity Leave

NWCI welcomed the introduction of two weeks paternity leave was an important step to recognising the role of fathers and the need to achieve a greater distribution of care between women and men. NWCI calls for a progressive increase in the period of paid paternity leave which would allow more fathers to care for their young children and push this out of the domain of 'women's work' for good.

Carers Leave

In Ireland, there is an entitlement to full-time' carer's leave, rather than an annual allocation of days as per the proposed EU Directive on Work-Life Balance. Balancing caring responsibilities with work is a growing problem for many workers, in particular women aged over 40.

NWCI Recommends

- Resource a full & retrospective Homecare Credit
- Introduce four months' paid parental leave
- Extend paid paternity leave to 1 month
- Introduce six paid days of carers' leave

Support gender sensitive pension reform

Ireland's gender pension gap stands at 26% and gender-sensitive pension reform is a priority for NWCI and our members. Please see NWCI submission to the Dept. of Employment affairs for the full context on gender aware equal pensions.

We welcome the government's response to gender-based inequalities and anomalies in the state pension system through the introduction of a Home Caring Period in combination with a Total Contributions Approach (TCA)²⁰. However, the approach remains piecemeal, with government tinkering on the edges of the system rather than making transformative changes to achieve greater coverage and greater equality, particularly for women most at risk of poverty in older age, Traveller women, ethnic minorities and women with a disability. Budget 2020 should deliver a full home caring credit with retrospective application. This practical recognition of the social and economic contributions of care provided by women should also serve as a re-entry credit.

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²⁰ We are concerned by recent data from the DEASP that indicates that of the 58,979 review decisions flowing from these changes that have been made, 33,738 have received no increases, a rate of just over 57pc

Universal State Pension

NWCI concurs with Social Justice Ireland (SJI)²¹, Age Action Ireland (AAI), and the Pension Policy Research Group (PPRG) that a universal pension system which gives women equal access to a comprehensive pension guarantee is the best way to support equality in older age. NWCI continues to call for the introduction of a universal pension based on residency, which would guarantee equal access to a comprehensive pension for all. A significant proportion of the €2.39 billion²² currently spent on private tax relief, 70% of which goes to men as the highest earners, should be reinvested in first tier State pension.

NWCI Recommends

- Initiate the introduction of a universal State pension
- End Tax reliefs on private pensions
 - Begin by removing marginal rate tax reliefs
- Resource & publish a gender impact assessment (GIA) of the TCA & Autoenrolment²³
 - Resource a GIA on projected increases in State pension age & subsequent pension reforms
- Deliver a full Homecarers credit that actively recognises the contribution of care and also serves as a re-entry credit
 - Apply to women born before 1946
- Ensure the TCA is limited to 30 years for the maximum pension

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²¹ A Universal State Social Welfare Pension: Recognising the Contribution of all our Senior Citizens SJI 2018

²² Collins, Supporting Pension Contributions Through the Tax, System Outcomes, Costs and Examining Reform

²³ NWCI understands a form of GIA may have been undertaken for TCA development by KPMG as part of its actuarial review of the Social Insurance Fund-if this is so we request release of the department's assessment, conclusions, etc.