

October 2020

Submission to the  
Department of  
Employment  
Affairs and Social  
Protection on their  
Statement of  
Strategy 2020-2023

## Introduction

Founded in 1973, the National Women's Council (NWC) is the leading national women's membership organisation. We represent and derive our mandate from our membership, which includes over 190 groups and organisations from a diversity of backgrounds, sectors and locations across Ireland. Our mission is to lead and to be a catalyst for change in the achievement of equality for women. Our vision is of an Ireland and of a world where women can achieve their full potential and there is full equality for women. NWC acknowledges the intersectionality of women's lived experiences and in particular seeks to end discrimination on the grounds of gender, family status, religion, race, age, sexual orientation, marital status, disability, ethnicity or membership of the Travelling community.

NWC welcomes the opportunity to make a submission on DEASP's strategy for 2020-2023. The development of this new strategy comes at a crucial juncture and it must include a plan to address the inequalities highlighted and reinforced by COVID-19. The Department holds responsibility for ensuring social inclusion, addressing poverty and supporting people back into work and as such, it will play a key role in driving our recovery and in shaping it. The focus for DEASP's strategy for the next three years must be on reforming our work and welfare systems so that they are capable of addressing the needs of diverse women in a post COVID-19 world and ensuring its policy and budgetary decisions are gender and equality proofed.

## Embed Gender and Equality proofing

Budget 2021 provides an allocation of €25.13bn for DEASP in 2021, the largest budget provided to any government department. Given the significance of this funding, and the role of DEASP in addressing poverty, pensions reform and labour market activation, it is particularly important that DEASP engage in comprehensive gender and equality proofing of policy and budgetary decisions. Effective gender budgeting must consider how intersecting oppression and discrimination impacts on women's experiences of a policy or budgetary decision.

Despite commitments to gender and equality proofing in a range of government policies, key DEASP policies produced in recent years, such as the Roadmap for Social Inclusion and pensions reforms such as Auto-enrollment do not provide evidence of gender proofing. While there is currently no statutory obligation on government departments to carry out gender and equality proofing, the OECD have included this in its recommendations to Ireland<sup>1</sup> and DEASP has an obligation to actively promote equality under the Public Sector Duty.

### NWC recommends

- Ensure that all new policies, strategies and investments are gender and equality proofed, including proposed pension reforms.
- Carry out a gender and equality proofing exercise as part of the mid term review of the Roadmap for Social Inclusion
- Task the proposed Commission on Taxation and Social Welfare with:
  - Carrying out a review of all individual and sectoral tax expenditures, assessing their cost and gender and equality impacts
  - Examining how employers PRSI can be increased to fund social infrastructure

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<sup>1</sup> <https://www.oecd.org/gov/budgeting/equality-budgeting-in-ireland.pdf>

## Ensure active labour market policy works for women

The Irish social welfare system was built for a different era on a largely male breadwinner understanding of both the labour market and social welfare systems. Eligibility for Jobseekers payments requires women with care responsibilities to prove that they can cover childcare needs, can work full time and are looking for full time work. Failure to satisfy these conditions means that women cannot establish an individual right to payment or to access education, training and employment opportunities. As we go into a period with record unemployment rates, it is important to remember that the current system has not been as effective at lowering female unemployment as male unemployment, with more women on the Live Register in February 2020 than February 2007.

*Our Shared Future* commits to a jobs-led recovery, to improve jobseeker supports for people aged under 24, to provide return ships to support women who have taken time out of work to raise their families and to specific targets for the uptake of apprenticeships by women, people with disabilities and disadvantaged groups.

### NWC recommends

- Invest in care as a key element of ALMP including development of training and professional salary scales. Care jobs are also green jobs.
- Develop a new gender and equality proofed labour market activation plan to address the challenges of working and living with COVID-19
  - Ensure it provides supports to those not currently in receipt of Jobseeker's payments, e.g qualified adults
  - Provide targeted supports to those furthest from the jobs market including carers and disabled women, e.g embed Job Coaches in all Intreo offices to support disabled people to obtain and retain employment
  - Develop a fully gender proofed national Traveller employment strategy as part of the mainstream strategy to take account of barriers to participation of Traveller women
  - Examine the role that a Participation Income could play in reforming our work and welfare system
- Gender and equality proof new labour activation initiatives and review their gender impact before scaling up
  - Ensure workers are not pressured to increase hours while maintaining care obligations
  - Ensure no-one is required to accept insecure, non-fixed hour jobs as 'reasonable offer of work'
  - Recognise atypical work patterns by calculating unemployment on hours rather than days per week
  - Ensure jobs created as part of a green new deal are gender proofed
- End the limitation rule and promote administrative individualisation at first point of contact
- Commission a national survey to ascertain skills, education, health, care and employment experience of qualified adults to address the data gaps on QA's

## Promote decent work

Ireland has one of the highest rates of low paid workers in the OECD, with 23% of the workforce designated as low paid compared to an OECD average of 15%.<sup>2</sup> The labour force is highly gender segregated and the sectors in which women predominate, tend to be those that are lowest paid and most precarious. While almost 70% of women are 'essential' workers, they are among the lowest paid in the economy. Minimum wage workers are more likely to be female, young, migrants and those working

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<sup>2</sup> OECD (2019). Wage levels statistics. <https://data.oecd.org/earnwage/wage-levels.htm>

part time<sup>3</sup> and six in ten childcare workers earn below the Living Wage. There is also a significant and growing gender pay gap.

#### NWC recommends

- Refocus the work of the LPC towards a living wage commission, as proposed in Budget 2021 and actively champion a move towards the Living Wage as the minimum wage
  - Make NWC a full member of the LPC/living wage commission
  - Attach social criteria, clauses and conditionality to Employer incentive schemes and advocate for government procurement processes to ensure living wage social clauses in key sectoral procurement processes in female dominated sectors.
- Regularise the situation of migrant workers
- Commission an independent, gender and equality proofed study to capture the extent of casual and bogus employment arrangements<sup>4</sup>
- Commission an up to date, independent nationwide study on the prevalence and nature of pregnancy discrimination and disadvantage in the workplace
- Support collective bargaining as evidence shows that it is one of the most effective ways to address the gender pay gap

## Ensure work life balance and recognise care

COVID-19 has brought into the public domain the reality of the largely unpaid and invisible care economy in which women dominate. It has also highlighted the inequalities of the distribution of care in our society. Women continue to provide the majority of unpaid work and the choices women can make with regard to employment are severely limited due to lack of a public early years and care infrastructure and as men have not taken equal responsibility for care within families.

#### NWC recommends

- Increase the rate of maternity, paternity and parent's benefit to €295 per week to bring more in line with EU norms<sup>5</sup>
- Work with colleagues in DCDEI to increase the duration of paid parents leave to 26 weeks per parent (or 52 weeks for lone parents), on a phased basis, to give parents choices in their child's first year
- Convert existing unpaid parental leave to paid leave
- Increase paid paternity leave to 4 weeks
- Resource a full & retrospective Homecare Credit that also acts as re-entry credit to access training
- Introduce six paid days of carers' leave
- Work with colleagues to establish an All Party Oireachtas Committee to make recommendations on the reorganisation of work, reduced working time and the 4 day week
- Commission a time use survey to gather updated data on time spent on unpaid work
- Work with colleagues to introduce legislation on flexible working to ensure that it is open to all from day one in the job, unless there are significant business reasons why that is not possible

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<sup>3</sup> Redmond, P. (2020). Minimum wage policy in Ireland. ESRI.

<sup>4</sup> As per the DEASP's Roadmap for Social Inclusion 2020-2025

<sup>5</sup> When the duration and value of paid leave across maternity, paternity and parental leave schemes is combined, Ireland lags behind our EU peers. Germany for example, provides total paid leave for mothers of 58 weeks, payable at the equivalent of 73% of the average wage. Ireland compares unfavourably with a combined 28 weeks of leave (26 weeks maternity, 2 weeks parental benefit) at 27% of the average wage.

- Though not under the remit of DEASP, the introduction of a universal, public childcare system is a key enabler of work life balance, of women’s participation in the labour market and of gender equality overall so NWC asks that DEASP work closely with colleagues in the Department of Children, Disability, Equality and Integration on this.

## End Poverty

The social welfare system plays an important role in reducing poverty and inequality. It should ensure that everyone, no matter what their stage of life, can live free from poverty. While 14% of the overall population was at risk of poverty in 2018, lone parents (86% of whom are women) continue to be among those most at risk of poverty (34%). Disabled women and women from outside the EU are also more at risk of poverty than the general population. Among those aged 65 and over, 15% of men and 25% of women are at risk of poverty.

Budget 2021 made some targeted increases to certain payments but failed to increase core social welfare payments. The increases in illness benefit and the setting of the PUP at a higher rate than job seekers payments is an acknowledgement that social welfare rates are too low to maintain an adequate standard of living for many.

### NWC recommends

- Establish the MESL as the benchmark for social welfare payments
- Recognise the unique challenges that come with parenting alone by providing targeted supports to lone parents such as allowing them to receive both the Jobseeker’s Transitional payment and Working Family Payment, reducing the requirement for Working Family Payment for lone parents to 15hrs and excluding Working Family Payment from income assessment for differential rental schemes
- Providing targeted supports to those most at risk of poverty by implementing a cost of disability payment, increasing the income disregards for Carers Allowance, granting Child Benefit and access to the Free Travel Scheme to those seeking asylum and restoring the full rate of Jobseekers Allowance for 18-24 year olds.

## Close the gender pensions gap

As women continue to do the majority of care work and are more likely to be in low paid, part time jobs, it is difficult to collect sufficient PRSI contributions to be eligible for the full State contributory pension and so women are more likely to be reliant on the non-contributory pension. Only 28% of women (55% of men) of pension age have an occupational or private pension with women less likely to be able to afford one and their employers less likely to offer one.<sup>6</sup> Older rural women are even less likely than older urban women to have an occupational or contributory pension.<sup>7</sup> These factors culminate in a gender pension gap of 35%.<sup>8</sup> The Homemaker’s Scheme does not address the inequalities and discrimination experienced by older women and those affected by the marriage bar.

*Our Shared Future* commits to maintaining the state pension as the bedrock of the system, introducing a Total Contributions Approach, and examining options for a pensions solution for carers. Based on NWC’s published research on pensions<sup>9</sup>, it is our view that introducing a universal State Pension system which

<sup>6</sup> CSO (2020). Pensions statistics. <https://www.cso.ie/en/releasesandpublications/ep/p-pens/pensioncoverage2019/>

<sup>7</sup> Ní Léime, A. et al. Gender and Rural Ageing in Ireland: Profile and Key Issues. Irish Centre for Social Gerontology National University of Ireland, Galway

<sup>8</sup> Nolan, A. et al (2019). Gender, pensions and income in retirement. Dublin: ESRI.

<sup>9</sup> [https://www.nwci.ie/download/pdf/pensions\\_publication\\_final.pdf](https://www.nwci.ie/download/pdf/pensions_publication_final.pdf)

will guarantee income adequacy in older age in the best way to achieve the commitments set out in the programme for government. This can be paid for by ending tax relief on private pensions and investing the savings in a first-tier state pension.

#### NWC recommends

- Task the proposed Commission on Pensions with examining how a universal pension could be implemented by ending tax relief on private pensions and investing the savings in a first-tier state pension
  - Grant NWC membership of the Pensions Commission currently being established
- Ensure the Total Contributions Approach (TCA) is limited to 30 years for the maximum pension and carry out a gender and equality impact assessment of TCA & Auto-enrolment
- Value care by delivering a full Homecarers credit that actively recognises the contribution of care and also serves as a re-entry credit and ensure that women born before 1946 can access
- Following on from the Budget 2021 decision to defer the increase in pension age, resource a GIA on projected increases in state pension age

### **Establish a Statutory Maintenance Service**

There is a significant rate of non-compliance with child maintenance orders, significant delays in the courts system and a high cost involved in engaging a litigious route. NWC welcomed the commitment in Budget 2020 to addressing the issue of child maintenance. A Statutory Maintenance Agency would take the issue of child maintenance out of the adversarial court system, reduce the burden on women to litigate for child maintenance orders and act as an anti-poverty measure. It has also been called for by the Joint Committee on Social Protection in its Report on the Position of Lone Parents in Ireland (2017) and the UN Committee on the Elimination of All Forms of Discrimination Against Women.

#### NWC recommends

- Establish a Statutory Maintenance Authority