

6 March 2025

Dear Mr. McKeon,

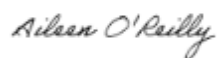
ALONE welcome this opportunity to provide input to the Department of Social Protection's forthcoming strategy. As an organisation who supported 43,982 older people across our services in 2024, we see the impact of the support provided by the Department of Social Protection on a regular basis. We would also like to voice our appreciation to the Department for your ongoing commitment to engagement with NGOs and particularly the work that goes into the annual Pre-Budget Forum.

ALONE has five key suggestions for commitments to be included within the Department's new statement of strategy. These are explained in further detail and with examples throughout this submission. The suggestions are:

1. To provide sufficient access to in-person services.
2. To increase awareness of certain benefits and entitlements and their eligibility criteria.
3. To ensure ease of access to social protection supports by reducing the administrative burden on the user.
4. To enhance cross-departmental working and communication as part of Budgetary and strategic processes.
5. To publish materials relating to benchmarking the State pension and other payments and implement the commitments to benchmarking laid out in the Roadmap for Social Inclusion and the Roadmap to Pensions Reform.
6. To invest in research to deliver evidence-informed policy.

We hope to continue to engage with the Department on a regular basis throughout the lifetime of the next strategy. Should you have any queries about the recommendations in this submission, or any other aspect of ALONE's work, please do not hesitate to contact us.

Kind regards,



Dr Aileen O'Reilly,

Head of Research, Evaluation and Policy

[Aileen.oreilly@alone.ie](mailto:Aileen.oreilly@alone.ie)



Gráinne Loughran,

Senior Policy & Advocacy Officer

[grainne.loughran@alone.ie](mailto:grainne.loughran@alone.ie)

## Submission from ALONE to the Department of Social Protection's Statement of Strategy 2025-2028

### 1. Commit to providing sufficient access to in-person services

While we recognise and welcome the progress in relation to digital services such as MyWelfare.ie, MyGovid.ie and others, older people are high users of services from the Department of Social Protection. There is a significant cohort of older people who will choose not to use online services, and we believe that the Department should commit to actively supporting these groups in the strategy by providing sufficient access to in-person services. In Finland, where the transition to digital and online services has progressed more quickly than in Ireland, many older people have reported alienation in their daily lives because of unequal opportunities to participate, with a particular impact on older people from lower socioeconomic groups.

CSO data from 2024<sup>1</sup> shows that 41% of people aged 75+ have never used the internet. Although CSO data from 2020 more closely investigated eGovernment usage<sup>2</sup> by age group, unfortunately for those aged 75+ the data sample size was too small for estimation. This emphasises the barriers older people can experience in accessing online services. We believe that digitisation should prioritise improving well-being rather than just cutting costs or increasing efficiency and that where services are provided online, older people should be included in policy discussions about these services to ensure their needs are met.

#### Example: Access to in-person Community Welfare Officers

While we acknowledge there are staffing challenges across many sectors of society, in ALONE's experience, in-person access to Community Welfare Officers (CWOs) has become particularly challenging in several areas of the country. This can be a barrier to older people accessing supports such as Exceptional Needs Payments. Challenges have included where CWOs have been removed from areas and not replaced (2024)<sup>3</sup> and a move away from walk-in appointments (2024)<sup>4</sup>, with a new option to make an application online. In addition, it has been reported that in-person clinics have been reduced (2022)<sup>5</sup> with disparities in availability across counties<sup>6</sup>. We recognise the additional pressures on this service in recent years and high demand given increased energy and housing costs, and the ongoing work of the Department to provide these necessary supports.

As high-level indicators, we suggest the below:

<sup>1</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-isshtc/internetcoverageandusageinireland2024/keyfindings/>

<sup>2</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-isshtc/informationandsocietystatistics-households2020/e-government/>

<sup>3</sup> <https://www.independent.ie/regional/wexford/new-ross-news/co-wexford-town-left-without-community-welfare-officer/a1694736111.html>

<sup>4</sup> <https://www.radiokerry.ie/news/kerry-county-council-to-write-to-department-asking-walk-in-community-welfare-clinics-be-reinstated-374370>

<sup>5</sup> <https://www.laoistoday.ie/2022/11/29/renewed-calls-for-minister-to-act-as-community-welfare-officers-still-not-reinstated-in-laois/>

<sup>6</sup> <https://www.anglocelt.ie/2022/08/29/issues-with-access-to-community-welfare-officers-highlighted/>

- Measuring and reporting on staffing levels of those providing direct services, including Community Welfare Officers.
- Measuring and reporting separately of the number of social protection transactions carried out in person and online.

## 2. Commit to increasing awareness of certain benefits and entitlements and their eligibility criteria.

As indicated, older people have lower levels of internet usage, and information about their entitlements is not easily accessible for them. Many of the older people supported by ALONE are not aware of what they are entitled to, and/or believe they are not eligible for some entitlements. In 2024, 3,257 individuals assessed by ALONE reported financial challenges. Among these individuals, 1,283 (40%) had issues with benefits and entitlements. These challenges typically arise from a lack of information about available supports or the need for assistance in completing application forms. By the time organisations like ALONE step in to help secure these benefits, individuals are often in urgent need.

### **Example: Awareness of expansion of eligibility criteria for Fuel Allowance**

Eligibility for the Fuel Allowance was broadened in 2022. However, there was no significant communications campaign to highlight the expansion of the scheme. This may be impacting take-up of this support.

Before the changes to the Fuel Allowance means threshold were brought in, in September 2022 there were 369,000 recipients of Fuel Allowance. When the changes were implemented in December 2022, the announcement was made that over 80,000 new households would now qualify. Though obviously a rough estimate (and not accounting for other changes), this should have brought the number of Fuel Allowance recipients up to 449,000. Yet, as of end June 2024, it was reported that 403,077 people were in receipt of Fuel Allowance<sup>7</sup>.

This leaves roughly 46,000 households who were expected to be eligible for Fuel Allowance but are not accessing it.

**Targeted and proactive communications campaigns relating to particular entitlements and benefits could ensure that older people and others are aware of the supports available to them. This could include media advertising, proactively contacting individuals who may be eligible for entitlements, and other initiatives.**

<sup>7</sup> <https://www.oireachtas.ie/en/debates/question/2024-09-09/1001/>

As a high-level indicator, we suggest the below:

- Measuring and reporting of the number of people receiving a benefit or entitlement, and the estimated number of people who are eligible for it.

### 3. Commit to ensure ease of access to Department of Social Protection supports by reducing the administrative burden on the user.

The range of supports available from the Department of Social Protection (and other Departments) can be confusing for some individuals. Different benefits require different forms, some have means tests and some do not, the means eligibility varies, some are applicable at different ages, and the applications are sent to many different organisations and Government departments. The complexity prevents some older people from accessing supports they are eligible for. It most severely impacts older people with lower literacy and numeracy skills, including online literacy. Skills in this area are often referred to as administrative literacy skills. As highlighted above, many older people ALONE support seek assistance locating and completing forms and applying for various entitlements.

We encourage the Department to consider how its forms and communications can be improved in line with the 'Customer Communications Toolkit for Services to the Public – A Universal Design Approach'<sup>8</sup>, developed by the Centre for Excellence in Universal Design (CEUD) at the National Disability Authority (NDA) with the Public Service Transformation Delivery team in the Department of Public Expenditure NDP Delivery and Reform.

In addition, we encourage the Department to consider how its various supports and payments might be administratively streamlined to improve ease of access, such as by reducing the number of forms required, streamlining eligibility criteria, and taking a 'one-stop shop' approach for older people to access their entitlements. This could take learnings from the approach taken by Revenue currently.

Actions associated with this could include, for example:

- Adapting the form and process for applying for the State Pension, so that the person does not have to fill out an additional form to apply for the Living Alone allowance, Household Benefits Package and/or Free Travel
- Streamlining of eligibility criteria (eg age at which one becomes eligible for various entitlements) across the entitlements available from this Department, as far as possible, and reducing the level of means testing across payments.
- Merging the Telephone Support Allowance with the Household Benefits Package or Living Alone Allowance, as this is a very small payment (€2.50 per week) which could be absorbed into other supports while reducing administrative burden.

<sup>8</sup> [https://universaldesign.ie/uploads/publications/Customer-Communications-Toolkit-2023-PDF\\_Final.pdf](https://universaldesign.ie/uploads/publications/Customer-Communications-Toolkit-2023-PDF_Final.pdf)

As a high-level indicator, we suggest the below:

- Measures of ‘customer satisfaction’ (included in the last Strategy) should include a measure of how easy or difficult customers find accessing various supports.

#### 4. Commit to enhancing cross-departmental working and communication as part of Budgetary and strategic processes.

We recognise and congratulate the Department on the work that has gone into improving cross-departmental working in recent years. We appreciate the resolutions achieved in recent years on certain issues affecting older individuals, such as the unintended impact of state pension increases pushing them over the eligibility limit for the medical card. We believe there is room for further improvement in the area of crossover issues and the Department’s ability to proactively address these, given the reliance of many Government departments on the Department of Social Protection. Ensuring that rates of social protection payments are considered within the broader policy and economic context, which can be provided by other Government departments, can support the delivery of other Government strategies as well as the Department of Social Protection’s work.

##### **Example: The Department of Climate, Environment and Energy**

While the Department of Climate, Environment and Energy has responsibility for the Action Plan to Combat Energy Poverty, the Department of Social Protection distributes the Fuel Allowance and the Household Benefits Package. We believe that further collaboration between the Departments would be welcome to ensure that social protection measures are adequately meeting the needs of customers in this area.

As a high-level indicator, we suggest the below:

- Progress in implementation of the commitments of Government strategies, such as the Action Plan to Combat Energy Poverty

#### 5. Commit to publishing materials relating to benchmarking the State pension and other payments, and implementing the commitments to benchmarking laid out in the Roadmap for Social Inclusion and the Roadmap to Pensions Reform

There have been several commitments to benchmark the State Pension, made in the ~~Roadmap for Social Inclusion 2020-2025 and the Roadmap for Pensions Reform 2018-2023.~~

Implementing pension benchmarking is an opportunity for Government to make a real and long-term impact on the lives of older people today and to lift many of the most exposed out of poverty. As the cost of living continues to increase, older people's incomes must be protected and benchmarked to keep up with inflation. As the Department is aware, Ireland is the only country in the Eurozone without a system of benchmarking state pension benefits.

We recognise the work of the Department to develop the approach to benchmarking currently set out, and to provide the input to Government for consideration as part of the annual budgetary process. We would urge the Department to work with Government to implement benchmarking as originally committed to (see extract from the Roadmap for Social Inclusion below) and laid out in the smoothed earnings approach. As the Department continues to work on the report on the application of benchmarking to other welfare payments, we also urge that this report and others relating to benchmarking (including the annual input currently made in relation to pensions) are published.

No.	Commitment	Responsible Departments	Timeline
24	Apply the benchmark in adjusting Pension changes for Budget 2021.	DEASP; DPER	Q4 2020
25	Consider and prepare a report for Government on the potential application of the benchmarking approach to other welfare payments.	DEASP	Q3 2020

As high-level indicators, we suggest the below:

- Publication of benchmarking report and materials
- Application of the benchmark in adjusting Pension changes
- Poverty and deprivation rates among older people

## 6. Commit to investment in research to deliver evidence-informed policy.

In the previous strategy, the Department made commitments to research which have been welcome, particularly the work on the report on 'The Cost of Disability in Ireland'. We would encourage the Department to recommit to this area in the next strategy to support further delivery of evidence-informed policy, which could help to inform rates of the pension, the living alone allowance, and other such payments. Areas for research investment in relation to older people's payments could include:

- Development of a Cost of Ageing index to better identify the various costs experienced by older people, to inform payment rates. This should include consideration of:
  - Additional cost of living alone (which should inform rate of Living Alone Allowance)
  - Housing costs
  - Urban/rural difference
  - Cost of disability and health costs (informed by the work of the Department previously on the cost of disability)
  - Savings requirements
- Up-to-date longitudinal research on the experiences of older people with poverty in Ireland. This should include consideration of family engagement levels, internalisation of disadvantage, self-perceived poverty, the relationship between disability and poverty among older people, and deprivation items.

As a high-level indicator, we suggest the below:

- The development of a research plan/strategy for the Department.