



EU Child Guarantee

**To: Department of Children, Integration,
Equality, Disability, Integration & Youth**

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Introduction

The Society of St Vincent de Paul (SVP) welcome the opportunity to make a submission to the Department of Children, Equality, Disability, Integration and Youth on the EU Child Guarantee.

As the largest charity of social concern in Ireland we work to provide practical assistance to those experiencing financial hardship and work to address the root causes of poverty through our policy and advocacy work. Child poverty is a core issue of concern for SVP as last year we received over 170,000 requests for assistance and almost 70% of those requests were from families with children. We believe that the EU Child Guarantee, if designed and implemented effectively, has huge potential to prevent and combat social exclusion by guaranteeing the access of children in need to a set of key services.

In this submission we outline the need to implement the Child Guarantee as part of a new comprehensive and cross-departmental National Child Poverty Plan, the key gaps in service provision for children as seen by SVP, and our policy priorities for the EU Child Guarantee.

Trends in Child Poverty 2004-2020

Research clearly shows that growing up in poverty is associated with worse outcomes across almost all key aspects of a child's life, including cognitive and educational attainment, school engagement, socio-emotional development, life satisfaction, and physical health.¹ Importantly, given the long-term damaging impact of poverty on children's lives, the need to tackle it has been a commitment by successive Governments.

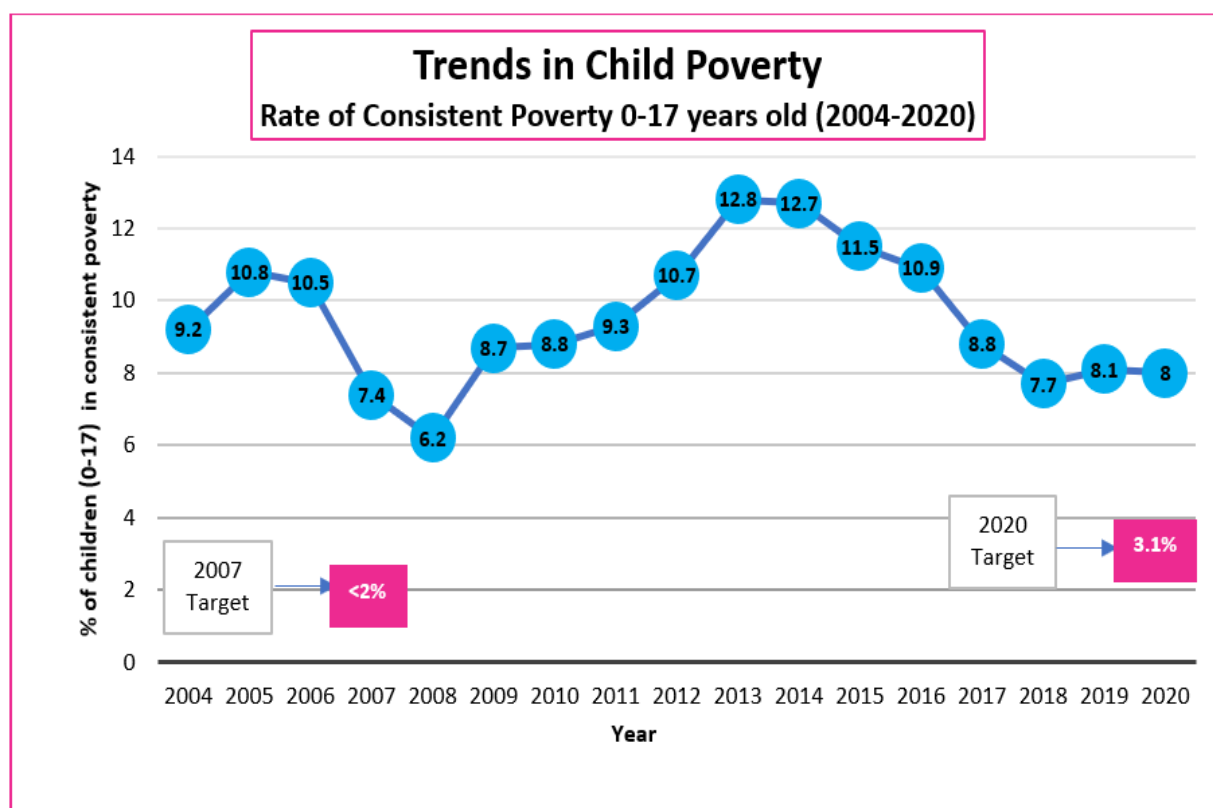
SVP welcomed the Government's child poverty reduction target outlined in *Better Outcomes, Brighter Futures: The National Policy Framework for Children and Young People 2014-2020*, which sought to reduce the number of children living in consistent poverty by 70,000 to 37,000 or 3 % of all children by 2020.²

At the outset of the last economic recession, the rate of consistent poverty among children was 6.2% in 2008 - the lowest rate since the measure was first introduced as a national

¹ Maître, B. Russell, H. and Smyth E. (2021) The dynamics of child poverty in Ireland: Evidence from the Growing Up in Ireland survey. <https://www.esri.ie/publications/the-dynamics-of-child-poverty-in-ireland-evidence-from-the-growing-up-in-ireland>

² Department of Children and Youth Affairs, *Better Outcomes, Brighter Futures: The National Policy Framework for Children and Young People 2014-2020*. Department of Children and Youth Affairs 2014.

indicator in 2003. During the recession, the rate more than doubled between 2008 and 2013 and peaked at a record high of 12.8% in 2013.³ From 2014 onwards as some austerity cuts were reversed, unemployment fell, and income supports to families were increased as child poverty become a focus of Government budgets, there was a welcome decline in the numbers of children living in consistent poverty. Between 2014 and 2018, over 60,000 children were lifted out of consistent poverty.



Source: Survey of Income and Living Conditions 2004-2020⁴

The 2019 figures see a reversal of this positive trend when the rate increased marginally for the first time in five years. In 2019, the rate of consistent poverty among children stood at 8.1 %, which equates to approximately 97,000 children – an increase of 5,000 children compared to 2018.⁵ This compares to a rate of 5.1 % for adults aged 18-64 and 2.3 % for those over the age of 65. The rate of consistent poverty increases to 17% among one-parent families,⁶ highlighting how if we are to be successful in tackling child poverty, we must support lone parents. The increase in consistent poverty is primarily driven by an increase in deprivation among children, rising from 19.7 % to 23.3 % between 2018 and 2019.⁷ The

³ Data extracted from the CSO Statbank and Survey of Income and Living Conditions <https://data.cso.ie/#>

⁴ Break in time series for 2019-2020 just to changes to CSO measures to align with new EU regulations.

⁵ Data extracted from the CSO Statbank and Survey of Income and Living Conditions <https://data.cso.ie/#>

⁶ Data extracted from the CSO Statbank and Survey of Income and Living Conditions <https://data.cso.ie/#>

⁷ Data extracted from the CSO Statbank and Survey of Income and Living Conditions <https://data.cso.ie/#>

2020 data, which is not directly comparable with previous years due to a break in the time series, shows there were an estimated 95,000 children living in consistent poverty, equivalent to 8% of all children under 18.⁸

To-date no Government has been successful in reaching their poverty targets. In 2002, the National Anti-Poverty Strategy pledged to reduce the number of children experiencing consistent poverty to 2% and, if possible, to eliminate child poverty by 2007.⁹ However, the rate only reduced to 7.4%.¹⁰

Given the impact of Covid-19 on children and families, achieving a reduction in child poverty will become more challenging. However, it is important to note that when poverty was rising rapidly among older people in the late 1990s, successive governments acted to reverse the trend, with the proportion of older people at risk of poverty falling from 27.1% in 2004 to 9.6% in 2010 and the proportion in consistent poverty falling to a low of 0.9% in 2010.¹¹ Similar focus and ambition is needed now to address child poverty.

The Need for A New National Child Poverty Strategy

SVP welcome the steps being taken to implement the EU Child Guarantee in Ireland but is concerned there is currently no national strategy to address child poverty. As there are a number of areas the Child Guarantee does not address, namely income, parental employment and transport, there is a need to implement a comprehensive child poverty strategy to ensure co-ordination and action across all Government targets.

Importantly, the Government's *Roadmap for Social Inclusion 2020-2025* commits to establish and report on a new target in respect of child poverty, to improve Ireland's ranking from 20th to at least 5th for 2025. This commitment must be the starting point to develop a new National Child Poverty Strategy, of which the EU Child Guarantee is key component. In this section, we outline the key targets, frameworks and monitoring mechanism required to support the implementation of a new plan.

⁸ CSO (2021) Table 3.1 Survey of Income and Living Conditions 2020 <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2020/povertyanddeprivation/>

⁹ Department of Family and Social Affairs (2002) *National Action Plan against Poverty and Social Exclusion 2003–2005*

¹⁰ Data extracted from the CSO Statbank and Survey of Income and Living Conditions <https://data.cso.ie/#>

¹¹ Data extracted from the CSO Statbank and Survey of Income and Living Conditions <https://data.cso.ie/#>

Targets and Measures

The consistent poverty measure is a robust and important primary indicator to track progress on child poverty. However, it is important to recognise the limitation of this measure. For example, some of the most marginalised children in Irish society including those living in emergency accommodation, direct provision centres and members of the Roma and Travelling communities are not counted in official poverty figures.

It also does not adequately capture inequalities in access to services. Notably, when the rate of consistent poverty among children was falling from 2014 onwards, the number of children experiencing homelessness increased by over 300%.¹² Similarly, while the rate of consistent poverty among all lone parents was falling, the proportion of lone parents working below the poverty line more than doubled between 2012 and 2019.¹³ Compared to one parent families in other European countries, the high cost of childcare and housing are significant barriers to employment and contribute to some of the highest poverty rates among lone parents in Ireland, compared to peer countries.

To have a complete picture of child poverty and to assess the impact of investment in services, it is recommended that additional indicators are included to capture the multidimensional nature of child poverty and the increased risk of poverty among certain groups of children. These indicators should form the basis of a 'child poverty dashboard', requiring annual reporting by Government to monitor progress across several domains.

Child Poverty Unit

SVP is supportive of a whole of Government approach and note the development of cross-departmental structures to support the implementation of BOBF as a positive mechanism. However, challenges remain as departments often work in silos, particularly in relation to budgetary decisions. Additionally, most departmental business plans or statement of strategies do not include a clear requirement that poverty and social inclusion measures are incorporated into service considerations and policy development. This means poverty is not seen as a top-line priority from some Department leading to a fragmented approach to policy implementation. To overcome this challenge, Ireland should look to international models that

¹² Focus Ireland 'Family Homelessness Data', available at [https://www.focusireland.ie/resource-hub/latest-figures-homelessness-ireland/?t=\\$2#Family](https://www.focusireland.ie/resource-hub/latest-figures-homelessness-ireland/?t=$2#Family)

¹³ Society of St Vincent de Paul (2019) Working, Parenting and Struggling: An Analysis of the Employment and Living Conditions of One Parent Families.

support the implementation of measures to tackle child poverty on a whole of Government basis.

In 2018, New Zealand introduced the Child Poverty Reduction Act.¹⁴ The purpose of this Act is to help achieve a significant and sustained reduction in child poverty in New Zealand by provisions that—

- encourage a focus by government and society on child poverty reduction:
- facilitate political accountability against published targets:
- require transparent reporting on levels of child poverty.

In addition to the legislation, the New Zealand Government has made child poverty a top-line priority by appointing a Minister for Child Poverty Reduction and establishing a child poverty unit in the Prime Ministers Office, driving implementation from the top.

The Child Poverty Unit's role is to:

- support the implementation requirements of the Child Poverty Reduction Act 2018
- support agencies to implement the legislation
- work with others to identify actions and policies for reducing child poverty
- provide advice to Ministers on child related matters
- work closely with the Child Wellbeing Unit on poverty-related aspects of the Strategy.¹⁵

In addition to the Unit, the Government has appointed a Chief Science Advisor to the Minister for Child Poverty Reduction. The role provides a direct line of independent advice to the Minister, with a focus on child wellbeing and poverty reduction.¹⁶

SVP are recommending that a similar structure is established and co-located at DSP and DCEIDY with a team of senior civils servants tasked with developing and implementing a cross-departmental child poverty action plans. A strong independent research programme on child poverty should continue to ensure comprehensive and robust evidence is driving policy development.

¹⁴ <https://www.legislation.govt.nz/act/public/2018/0057/18.0/LMS8294.html>

¹⁵ <https://dpmc.govt.nz/our-programmes/reducing-child-poverty>

¹⁶ <https://dpmc.govt.nz/our-business-units/child-wellbeing-and-poverty-reduction-group/chief-science-advisor-minister-child>

Monitoring Progress and Poverty Proofing

The Roadmap for Social Inclusion 2020-2025 references the need to undertake Poverty Impact Assessment, Equality and Gender Proofing and Social Impact Assessment,¹⁷ however none of the 69 commitments in the roadmap are directly related to poverty proofing policy or budgetary decisions. The Programme for Government commits to ensure “any changes made in social welfare provisions will continue to be gender- and equality-proofed” but does not refer to the need to assess the impact of policy on poverty nor the impact of changes in policy from other Government Departments.

At a webinar on international perspectives on addressing child poverty hosted by SVP in September 2020, the Director of the Child Poverty unit in New Zealand Government stated that one of the most effective mechanisms for facilitating a joined up approach to child poverty within their budgetary process was the amendments made to the Public Finance Bill.¹⁸ Sections 49 and 50 amendment to the Public Finance Act 1989 require the Government to produce a report on child poverty as part of the budgetary process.¹⁹

The report must

- discuss any progress made, in the most recent completed financial year, in reducing child poverty consistent with the targets under the Child Poverty Reduction Act 2018.
- and indicate whether and, if so, to what extent, measures in or related to that Bill will affect child poverty.

It is too early to establish the impact of such changes, with the Government’s first three-year target as set down in the legislation set to be assessed next year. However, the New Zealand example shows how it is feasible to increase accountability and monitoring of anti-poverty policies using statutory instruments. The legislation and amendments were introduced as part of their overall well-being approach which intrinsically links it to new fiscal and economic policy. There is potential to leverage learning from New Zealand here in Ireland through the development of the recent Well-being Framework and by placing poverty targets and poverty proofing on a statutory footing.

All Government departments should be required to produce an assessment on proposed budgetary measures on levels of poverty across households. The requirement to do so

¹⁷ See page 74 of the Roadmap for Social Inclusion:

<https://www.gov.ie/pdf/?file=https://assets.gov.ie/46557/bf7011904ede4562b925f98b15c4f1b5.pdf#page=1>

¹⁸ The webinar, which also included inputs from Scottish and Irish NGOs and Government Officials can be viewed here:

<https://www.facebook.com/SVPireland/videos/child-poverty/2731410943775160/>

¹⁹ <https://www.legislation.govt.nz/act/public/2018/0057/18.0/LMS8403.html#LMS8403>

should be incorporated into the Finance bill, whereby the Department of Public Expenditure and Reform take a leading role ensuring that the management of public expenditure is evaluated against the impact it has on reducing poverty and inequality.

Recommendations for a New National Child Poverty Strategy

- **Set a new target to reduce the proportion of children living in consistent poverty to 2 per cent or less by 2025 and eliminate child poverty by 2030 in line with the UN Sustainable Development Goal of No Poverty. Introduce legislation to make this target legally binding.**
- **Establish a co-located Child Poverty Unit in the DCEDIY and DSP tasked with strategically developing child poverty actions plans and driving implementation across Government.**
- **Resource and implement cross-governmental national action plan to ensure Ireland reaches the target of reducing child consistent poverty to 2 per cent or less by 2025 and delivers on the commitments set out under the EU Child Guarantee.**
- **Develop a ‘child poverty dashboard’ requiring annual reporting by Government to monitor progress across a number of domains and sub-group targets for children most at risk of poverty and exclusion, including children in one parent families, those living in homeless accommodation or direct provision, Traveller, and Roma children and those with a disability.**
- **Establish a well-resourced parliamentary oversight committee to monitor action on child poverty.**
- **Place the process of poverty and equality proofing of all Government policy on a statutory basis.**
- **Report annually on how the budget will reduce child poverty and how the Government is progressing towards its targets.**

Areas for Priority under the EU Child Guarantee in Ireland

SVP members see first-hand the impact of the housing and homelessness crisis, educational disadvantage, and how living on low incomes affects individuals and families across Ireland. Being priced out of rental housing; disadvantaged by underfunded school services;

remaining in emergency accommodation for long periods of time; unaffordable childcare; inadequate, poor-quality housing; blight too many lives and prevent many from reaching their potential.

SVP currently provides direct financial assistance to make up for deficiencies in public services, particularly in the areas of health, education, and housing. We also indirectly subsidise meeting basic needs like food, because some people must spend such a large proportion of their income on ever-increasing rents and fuel costs, where affordable rented homes are not available, and accommodation is poor in terms of both quality and thermal efficiency.

In this section, we draw on our experience of directly working with families in poverty to highlight the key gaps in children's access to services and the areas for priority under the EU Child Guarantee.

Free Early Years Care and Education

It is well established that in countries with public provision of childcare, early years care and education is more affordable, accessible, and of higher quality than in countries with private provision.²⁰ Research also shows that publicly provided childcare is linked to better outcomes for children and higher maternal life satisfaction.²¹ In addition, it is recognised that access to free or highly subsidised childcare is one of the best mechanisms to reduce poverty in one parent families.²²

Childcare is continually cited as the main barrier to employment for lone parents who want to take up or increase their working hours. A 2019 SVP report found that almost 60% of one parent households were unable to access childcare services due to financial reasons. Recent research published by the ESRI, which looked at this data in more detail, found that where lone parents without a need for childcare are excluded, the proportion citing financial barriers to childcare rises to 91%.²³ This is the second highest rate among all EU-15

²⁰ Heery, E. (2020) 'Public Provision of Early Childhood Education: an Overview of the International Evidence', Oireachtas Library and Research Service Briefing note https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2020/2020-06-16_l-rs-note-public-provision-of-early-childhood-education-an-overview-of-the-international-evidence_en.pdf

²¹ *ibid*

²² Daly, M. (2020) Reducing Child Poverty: Challenges and Opportunities for Ireland, Presentation at Children's Rights Event on the EU Child Guarantee https://www.childrensrights.ie/sites/default/files/submissions_reports/files/Prof%20Mary%20Daly%20Child%20Guarantee.pdf

²³ Grotti et. al. (2019) Technical Paper on Access to Care Services in Ireland, Social Inclusion Technical Paper No. 9. <https://www.esri.ie/system/files/publications/BKMNEXT371.pdf>

countries just after Spain and is not surprising as childcare costs in Ireland are some of the highest among all OECD countries.²⁴ In Sweden and Denmark, where childcare is universally available and highly subsidised, cost was not a barrier to childcare for one parent families.

The National Childcare Scheme (NCS) provides good support to many families, but it has created barriers to education and training for lone parents. The NCS offers excellent support for preschool children but tapers off once a child enters school and again when the child reaches 1st class. This coincides with when lone parents must engage with the Department of Social Protection to prepare for employment. It is estimated that afterschool services in Dublin currently cost between €115 per week and €144 per week. The maximum subsidy available under NCS (2021) for a child in 1st class is €63.75.²⁵ It is not possible for a parent on social welfare to pay €51.63 to €80.48 per week for school age childcare. In effect, lone parents are locked out of education and training opportunities that may improve the long-term outcomes for their families.

The decision to discontinue the practice of deducting hours spent in pre-school or school from the entitlement to NCS subsidised hours (as announced in Budget 2022) is very welcome and will provide additional support to the families as described above. This must be further built upon within the Child Guarantee commitments to deliver free childcare care to all lone parents and low-income families.

Another issue that arises is that the amalgamation of previous schemes has resulted in some of the most disadvantaged and marginalised children being locked out of early years care, particularly children in very disadvantaged circumstances where no parent is in work, education, or training.²⁶ Our Childcare centres would have numerous examples of families who are negatively impacted by the transition to the NCS. Some of the families we support would not be known or engage with statutory agencies, so therefore they cannot avail of the support given through early learning and care and after-school provision.

²⁴ OECD (2017) The Pursuit of Gender Equality: An Uphill Battle. <https://doi.org/10.1787/9789264281318-graph67-en>

²⁵ Analysis provided by SPARK

²⁶ Irish Times Article, 11th September 2021, Thousands of State's Poorest Children Face Losing After-School Childcare Places <https://www.irishtimes.com/news/social-affairs/thousands-of-state-s-poorest-children-face-losing-after-school-childcare-places-1.4670570>

“A six-year-old girl from a single parent family where the parent is unemployed. This family previously had a social worker, but the case has been closed for approximately 6/9 months. The child currently attends a Speech and Language Therapist but as the child is over 4 years, she cannot be sponsored by a Speech Therapist. This family will qualify for no subsidy through the NCS system but would have been awarded Band A through CCS” (SVP Family Resource Centre, East Region)

SVP note that some of these issues were identified through the recently published external consultant is reviewing the first year of the NCS, including engaging with the named sponsor bodies around referral pathways and criteria for sponsorship.²⁷ However, a more efficient and effective way of reaching all children who would benefit from early years care support is required.

Overall, policymakers should view access to quality childcare provision via the National Childcare Scheme (NCS) as part of the holistic support required by low-income families, and every aspect of the scheme should be poverty proofed. It is critical that these issues are resolved so that the State can fulfil its commitments under the European Child Guarantee which would allow free and effective access to early years care and education to children in disadvantaged circumstances, including those in one parent families.

Recommendations for Free Early Years including School Aged Childcare:

- **Unlock free early care and education including afterschool care to all low-income families, including one parent families (i.e., eligibility based on satisfying a means test for existing state benefits).**
- **Ensure all disadvantaged children can access early years care and education by expanding access to all children regardless of their parents' employment status (i.e., via Medical Card eligibility).**
- **Exclude Child Benefit and child maintenance as reckonable income for the purposes of the National Childcare Scheme.**
- **Prioritise addressing the lack of availability of childcare for low-income families accessing further training and employment opportunities, particularly for lone parents.**

²⁷ Frontier Economics (2021) 12-month review of the National Childcare Scheme: A report prepared for the Department of Children, Equality, Disability, Integration and Youth (Ireland) <https://www.gov.ie/en/press-release/94c40-review-reveals-the-national-childcare-scheme-is-having-a-positive-impact-on-use-of-early-learning-and-childcare-workforce-participation-and-family-finances/>

Free Education including School Related Activities

For many years, SVP has been highlighting the issue of school costs and their negative impact on low-income households. We see the anxiety of parents trying to juggle their low incomes to meet the myriad demands during the school year for events, curricular based sport and music costs, trips, fund raising ventures and equipment. It is the experience of our members that requests from schools for voluntary contributions causes significant stress and financial worry for families. Our members are particularly concerned about the increasing number of calls they are receiving from worried parents in relation to the cost of iPads and tablets, used to complete and access the school curriculum. Many of these devices are costing between €600 and €800.

*“The children look for money for school trips, and we often have to say no to even five euro, we just don’t have it, even though we budget carefully. We have to say “sorry we can’t”... they are very good kids, and we hate that they feel different.
”.” Stories of Struggle, 2018*

The Vincentian Partnership for Social Justice (VPSJ) estimate that the cost of education for a primary school student is €349 per year and for a secondary student this increases to €849. This is excluding the estimated cost of €260 for a computer which brings the total cost to €1,458 for the year.²⁸ In our experience, to pay for back-to-school costs low-income families often cut back on other essentials, go without, go into debt with a high-cost moneylender or reach out to SVP for assistance.

In August 2021, SVP took almost 300 calls every day last week from parents struggling with back-to-school costs. Calls for help with school costs in 2021 are up 10% compared to previous years. Despite the increase in the Back-to-School Allowance in recent years and the new circular on reducing school costs to parents, it is our experience that these costs they continue to put significant pressure on low-income families and act as a barrier to school participation for disadvantaged children. The level of demand underlines the need for much greater investment in the education system to ensure that all children and young people can access and participate in education on an equal footing.

²⁸ Correspondence from VPSJ May 2018

“Stories of Struggle” a qualitative research study carried out by the Vincentian Partnership for Social Justice on behalf of SVP highlighted the reality experienced by households with children the income of which falls below that required for a minimum essential standard of living.²⁹ In this research, families with children in DEIS primary schools benefitted from school sports, school activities, financial aid for school uniforms, books and more. For children in non-DEIS schools there was significant gaps in the provision of supports and a greater financial burden fell on parents.

Secondary school is more expensive for parents and was described in the research as “unaffordable” and “for rich kids or better off families.” In our experience, the loss of child benefit once a child reaches the age of 18 is a huge blow to families and can contribute to early school leaving as the cost are significant in 6th year.

SVP also see first-hand the difficulties faced in accessing education by the most marginalised children, including those in emergency accommodation and direct provision. Families who are living in emergency accommodation and direct provision must endure the daily worry of how they are going to provide nutritious meals for their children, the disruption caused to schooling, and the stress of living in overcrowded, unsuitable temporary accommodation for extended periods of time. The cost of education is also a significant issue for children and young people in Direct Provision. Even if a family is in receipt of the Back-to-School Clothing and Footwear Allowance, it is still wholly inadequate in meeting the cost of education as the Daily Allowance.

The underinvestment in the education system is impacting on the most marginalised children in society. If children and young people do not have the resources they require, it hinders their future in education. As a result, it is imperative that we now take long-term measures to ensure that all children have access to proper and free education so that they can participate in school and secure educational opportunities that are on offer regardless of their parents' economic status.

²⁹ VPSJ (2018) Stories of Struggle: The Experience of Families Living below a Minimum Essential Standard of Living.

Recommendations for Free Education:

- **Deliver on the Programme for Government commitment to provide additional supports for students who are homeless, resident in family hubs, or in direct provision.**
- **Develop and resource a 5-year action plan to provide genuinely free and secondary primary education to all children.**
- **Provide free schoolbooks at primary and secondary level at a cost of €40 million per year by 2024.**
- **End the practice of “voluntary” contributions by increasing the capitation grant to reflect the real running costs of schools.**
- **Monitor the implementation of the 2017 school costs circular.**
- **Establish an in-school and extra curricular activities discretionary fund to ensure schools can support participation of all students in activities and target those who may be excluded due to costs.**

Free Healthcare

Our work with families living in poverty emphasises the stress and impact on health caused by medical costs, lack of timely access to services such as GP and dental care and the importance of the medical card. In carrying out their work on establishing consensual budget standards, the Vincentian Partnership for Social Justice found that health insurance was considered as a need, not a want, for households who do not qualify for a medical card. Focus group participants reached a consensus in deciding that a low-cost private healthcare scheme should be included in the health budget. The fact that many households cannot afford private health care was not seen as a reason for ignoring an important need.

For those with a medical card, they stressed the value of this entitlement and said that: “nothing is worth the risk of losing a Medical Card.” In houses where there is not an entitlement for all the members to have a Medical Card the adults try to treat themselves and avoided going to the doctor. The same applied to visits to the Dentist. In a number of cases where they were problems in getting dental treatment for children parents made further cutbacks in expenditure in areas such as food and household energy or got loans in order to meet costs. The research showed while parents take risks with their own health, they are very careful about that of their children.

“Thank goodness the children are healthy. What would we do if they were delicate?” Stories of Struggle, 2018

Expenditure on over-the-counter health care items was an anxiety for parents when they had not budgeted for such costs in a particular week.

A new system of universal healthcare where care is provided based on medical needs rather than ability to pay is essential and we hope to see significant progress in the implementation of Sláintecare. In the interim we need to ensure low-income families can access healthcare when they need it, and it is important to note that the income thresholds for the medical card have not been revised since 2005. Currently, the medical card income threshold for a family of 2 adults with 2 children under 16 is €342.50 a week. In 2020, the poverty threshold for this family type was €633.36³⁰ and earlier analysis of the Survey of Income and Living Condition estimates that approximately 15% of children living below the poverty did not have a medical card or a GP card.³¹ Although it is not possible to determine from this data whether this is due to non-take up or ineligibility,³² the level at which the current thresholds are set technically means that families can be on a very low income and not be entitled to a medical card.

All means-tested benefits, including the medical card, are equivalised based on the type of household, i.e., the number of people in the household and the proportion of householders who are financially dependent. Significantly, different systems of equivalisation are used in assessing different means-tested benefits. The income thresholds for the medical card in relation to dependent adult and child are lower than most other social welfare benefits and are well below the recommended target for children of 33-35% of an adult payment. For example, the additional allowance of €38 for children under 16 represents just 21% of the adult allowance of €184. If the medical card thresholds were equivalised to the same standards as other social welfare payments, income thresholds would be more generous and would make more children eligible for the medical card. At the current rate the medical card income thresholds can be considered to excessively penalise families with children.

SVP members continue to raise concerns about the cost of travelling to health-related appointments. For people on low incomes living a long distance from hospitals and clinics, the cost of travel, coupled with the cost of food and accommodation which is sometimes necessary, can reach hundreds of euros, and is unaffordable for many. Prescription charges

³⁰ CSO (2021) Survey of Income and Living Conditions <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2020/>

³¹ Calculations based on analysis of the 2015 Anonymised Microdata File of the Survey of Income and Living Conditions.

³² <http://www.tara.tcd.ie/bitstream/handle/2262/82171/5callan.pdf?sequence=1>

and expenditure on over-the-counter healthcare can also cause anxiety when these costs are not budgeted for in a particular week.

Recommendations for Free Healthcare:

- **Provide free access to GP care to all children under the age of 18.**
- **As we transition to a system of universal health care, ensure everyone on a low income can access care by increasing the medical card income thresholds to the equivalent of the highest means-tested welfare payment and expand eligibility to families in receipt of the Working Family Payment.**
- **Reduce health-related costs for low-income households by abolishing prescription charges for all medical card holders.**
- **Increase the annual allocation to the hospital discretionary funds, to support low-income individuals and families under financial pressure due to health and hospital-related charges.**

Adequate Housing

Homelessness

Homelessness is devastating for families – it causes trauma and can do life-long damage to the health and well-being of children and parents. SVP believe adequate housing should be viewed as a fundamental human right.

SVP is concerned about the reversal in the downward trend in child and family homelessness since June 2021 with a 19% increase in homelessness over a six-month period.³³ This is hugely worrying given the detrimental impact homelessness has on children and underlines the importance of the Child Guarantee delivering on the commitment to ensure children have access to adequate housing and are prevented from entering homelessness in the first place.

³³ <https://www.focusireland.ie/knowledge-hub/latest-figures/>

Families living in hotels and B&Bs face a range of difficulties. In terms of schooling and food SVP members encounter children living in the hotels who would have to go to school many miles away. This would often involve their parents taking two buses to the school and another two bus runs to collect them. Then children have to do their homework and studying in a crowded room with their parents and younger siblings. Teachers report that homeless children are arriving at school too tired to take part in classes due to long travel time to school and sleep disruption due to sharing a single room with parents and siblings in a hotel which may be noisy at night.

“A family we helped attend summer camp in our local resource centre did not participate in an end of week outing to a leisure centre. Members found out later that the parent had no way of drying towels in the hotel room and felt embarrassed by this fact and didn’t send her children on the swimming trip as a result” SVP Member, East Region

With no cooking facilities families are unable to have proper nutritional meals, relying mainly on take-a-ways and convenience foods. Washing and ironing is another difficulty. Often it can only be done at specific days and times. Then there are rigid rules in some premises which inhibit a family’s movement, for example a curfew in place on children leaving the room and a ban on visitors. SVP members often have to meet families in the lobby of where they are staying.

There is also the uncertainty. Families may lose their accommodation at short notice, if for example the hotel has a major function and requires the rooms. Things are even more difficult for families who have to source their own emergency accommodation on a ‘self-accommodating’ basis which can involve regularly making hundreds of phone calls to hotels and B&Bs seeking a room for the night for themselves and their children. Then there are psychological and relationship issues caused by families having to live together in cramped and stressful conditions.

The Children’s Rights Alliance has published comprehensive research on the educational needs of children who are experiencing homelessness³⁴ while Focus Ireland has published

³⁴ Scanlon, G & G McKenna (2018) Home Works: A study on the educational needs of children experiencing homelessness and living in emergency accommodation. Available from www.childrensrights.ie/sites/default/files/submissions_reports/files/Home%20Works%20Study%20on%20the%20Educational%20Needs%20of%20Children%20experiencing%20Homelessness%20-%20Full%20Report.pdf

research into food poverty among homeless families living in emergency accommodation.³⁵ Findings from research in the Irish context must be used to inform the development of the EU Child Guarantee in Ireland to ensure the needs of the most marginalised children are recognised and responded to effectively.

SVP are deeply concerned about the thousands of children who are experiencing hidden homelessness. These children have no place to call home and are often doubling up, tripling up, staying with friends or relatives as they have nowhere else to go. Their living situation is precarious, unsuitable, and unsustainable. Despite facing many of the same challenges faced by those living in emergency accommodation, those experiencing hidden homelessness don't qualify for many support services as they are not counted in official homeless statistics.

Some children are more at risk of homelessness and housing insecurity requiring targeted supports and interventions. Approximately, 40% of Traveller children are living in overcrowded accommodation and are at greater risk of homelessness and housing insecurity.³⁶ One parent families are also disproportionate represented among the homeless population. Despite making up only 20% of families in Ireland, one parent families account for 53% of homeless families. Lone parents also had higher rates of affordability issues (19%) when compared to the general population (5%) and were more vulnerable to housing quality problems such as damp and lack of central heating (32% compared to 22%).³⁷

Commenting on the report, the UN Special Rapporteur on the right to adequate housing, Prof Balakrishnan Rajagopal, said it raised “a fundamental question over the treatment of single parents and their children by society” and pointed to the need to ensure that everyone has equal access to a safe and adequate home.³⁸

³⁵ Share, M & M. Hennessy (2017) Food access and nutritional health among families in emergency accommodation. Available from www.focusireland.ie/wp-content/uploads/2014/08/Share-and-Hennessy-2017-Food-Access-Report-%E2%80%93-Main-Report-FINAL.pdf

³⁶ Joint Oireachtas Committee on Children and Youth Affairs Wednesday, 8th May 2019 Children's Rights Alliance Report Card 2019: Discussion <https://www.kildarestreet.com/committees/?id=2019-05-08a.262&s=%22direct+provision%22+2019-05-08..2019-05-17#g265>

³⁷ Russell, H., Privalko, I., McGinnity, F. & Enright, S. (2021) Monitoring Adequate Housing in Ireland <https://www.esri.ie/publications/monitoring-adequate-housing-in-ireland>

³⁸ RTE News Report, 14th September 2021, 'Lone parents and children account for 53% of all homeless families – report' <https://www.rte.ie/news/ireland/2021/0914/1246582-lone-parents-housing-report/>

SVP welcomed the commitment to work toward ending homelessness by 2030 are concerned about the lack of emphasis in the plan on child and family homelessness. Importantly the EU Child Guarantee includes the provision for Member States to assess and revise national, regional, and local housing policies to take actions to ensure the interests of children in need and their families are duly considered. Working with the Department of Children, the Department of Housing has an opportunity to address the gaps identified above to ensure that Housing for All and subsequent sub-strategies are child and families centred in their approach

Housing costs, housing insecurity and poverty

In SVP's experience, rising housing costs have becoming increasingly a driver of poverty and deprivation among the households we support. While the Housing Assistance Payment is an essential short-term support for those in housing need, as a long-term response this does not provide good value for money to the state and does not ensure affordability or sufficient security of tenure for many households living in private rented accommodation. The latest data from the Survey of Income and Living Conditions shows that the at risk of poverty rate for those living in accommodation Rented through Housing Assistance Payment (HAP), Rent Supplement and the Rental Accommodation Scheme (RAS), was 55.9% when rent was deducted from disposable income, almost 2.5 times higher than before it was deducted (22.7%). For lone parents, the at risk of poverty rate increased from 31.8% to 50.0% after rent was deducted.³⁹

Our members regularly intervene to try and prevent homelessness in cases where families are struggling due to the shortfall between Housing Assistance Payment or Rent Supplement and actual rents in the private rented sector. In our 2019 report with Threshold entitled Housing Assistance Payment (HAP): Making the right impact? 20% of the tenants surveyed were paying more than the 30% limit, with 10% paying more than 40% of their net income on rent. Almost half (45%) of those paying a top-up said that they were struggling with paying utility bills, buying groceries, and covering childcare and school costs as a result. The report contains many examples of the difficulties HAP tenants face, including the discrimination experienced by some vulnerable households trying to access housing in the Private Rental Sector (PRS), who must compete with other prospective tenants who may be seen as more desirable by landlords.

³⁹ CSO (2021) Survey of Income and Living Conditions 2020 <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2020/povertyanddeprivation/>

Ending the reliance on the private rented sector to meet social housing need and the increased provision of social and affordable homes by the state to provide safety and security is to the forefront of the minds of SVP members who visit and support some children experiencing housing insecurity.

Poor standards and energy poverty

SVP members visiting families in their homes have reported that some people are living in very poor standards of accommodation, despite the aim of using HAP to improve standards in the PRS. In *Stories of Struggle*, families were dissatisfied with the accommodation options in the private rented sector, because of problems with security of tenure, poor quality properties and overcrowding. For some families in private rented accommodation, there was also lower energy efficiency. Houses were poorly insulated or the method of heating the home was wasteful: “the problem is that we can’t heat it properly, especially in the bad weather” and “the big range eats up all the fuel, the house is a cold house, so I spend extra money on fuel to keep our home warm.”

Local Authorities inspecting their own housing stock remains problematic. The vast majority of social housing stock is in good quality, however, as SVP members report there are local authority housing tenants with limited incomes and resources that continue to live in poor quality housing with little hope of this improving while local authorities oversee inspecting their own properties.

In research published by SVP in 2019, it showed that children are a group most exposed to the risk of energy poverty and that growing up in an energy poor household has a distinct negative impact on children’s health outcomes.⁴⁰ However, despite this greater risk for children, particularly those living in one parent families, current policies and schemes are failing to effectively target children and families experiencing energy poverty. While much progress has been made in recent years regarding energy efficiency schemes, a lot more investment is required to further improve the energy performance of our entire housing stock, with a focus on the private rented sector.

⁴⁰ SVP (2019) *Growing up in the Cold: Policy Briefing on the Extent and Impact of Energy Poverty in Household with Children*. <https://www.svp.ie/getattachment/2cb10388-e3ca-41ef-9911-a17f252ce09c/Growing-up-in-the-Cold.aspx>

The Warmer Home Scheme, which is available to social welfare recipients who own their own home offers good support. However, there are challenges in terms of access to and take up of these schemes among families. Over 75% of applicants for the Warmer Home Scheme qualified based on being in receipt of Fuel Allowance—the majority of which were pensioners.⁴¹ Therefore, this scheme may be a good option for older people who own their own homes but for energy poor households with children, it is more likely they are living in social housing or the private rented sector. Since 2016, 900 homes have been upgraded under Warmth and Well-Being Scheme, a targeted scheme for vulnerable households (homeowner or social housing tenants) with respiratory problems, but just 30 households with children have received support under this scheme.⁴² This suggests there are barriers to take up among families with children.

Being a tenant increases the risk of being in energy poverty compared to being a homeowner. Using data from the Growing up in Ireland survey, research by SVP has shown children (five-year-olds) living in the private rented sector were 2.2 times more likely to experience energy poverty than those in owner occupied housing.⁴³ This is in the context whereby the number of children living in the private rented sector continues to rise - between 2006 and 2016, the number of primary school aged children living in rented accommodation rose by over 75%. Private renters do not have the authority, autonomy, or access to grants to make changes to their dwelling to ensure greater energy efficiency, reduce CO2 emissions or attain an increased level of thermal comfort. In September 2021, SVP and Threshold published a joint discussion paper which laid out comprehensively the measures needed to increase the energy efficiency of the accommodation in the Private Rented Sector. It offers a clear pathway for Government to ensure tenants and families in the private rented sector are not left behind in its retrofitting plans.⁴⁴

New initiatives and measures should be incorporated into the Climate Action Plan and be rooted in a solid understanding of children's experiences of living in energy poverty and poor housing. A greater emphasis on energy poverty alleviation among children within climate and energy policy will not only contribute to Ireland's child poverty reduction target but will

⁴¹ *ibid*

⁴² *ibid*

⁴³ *ibid*

⁴⁴ SVP and Threshold (2021) Warm Homes for All: strategies for improving energy efficiency in the private rented sector <https://www.svp.ie/getattachment/b950a94b-f443-4982-a317-eee4afc7ebd8/Warm-housing-for-all-Strategies-for-improving-ene.aspx>

also improve the living standards for low-income households, reduce health care costs, enable a more efficient and better quality housing stock and help address climate change.

Recommendations for Adequate Housing:

- **Develop and resource a child and family specific homelessness strategy with a strong emphasis on homeless prevention particularly targeted at the needs of one parent families and members of the Traveller community.**
- **Increase the social housing targets from 10,000 to 15,000 per year to meet current demand and reduce the reliance on housing supports such as RAS, RS and HAP to accommodate low-income households.**
- **Complete a full review of the Housing Assistance Payment (HAP) and its interaction with the Private Rented Sector. Issues that need to be examined include, the use of HAP top-ups among low-income households, insecurity of tenures, private rented accommodation standards, refusal of some landlords to accept HAP, support with HAP arrears and the increasing cost of the programme to the State Exchequer relative to investment in the build of new housing.**
- **Extend the “Warmth and Well-Being” programme nationwide to ensure all children with respiratory issues can live in warm and energy efficient homes.**
- **Develop and resource a strategy to introduce minimum energy efficiency in the private rented sector. Begin by piloting the extension of the Warmer Home Scheme to HAP tenants, conditional on the landlord providing a longer-term lease.**
- **Increase funding to Local Authorities to ensure existing stock is adhering to minimum standards and are energy efficient.**

Adequate Nutrition

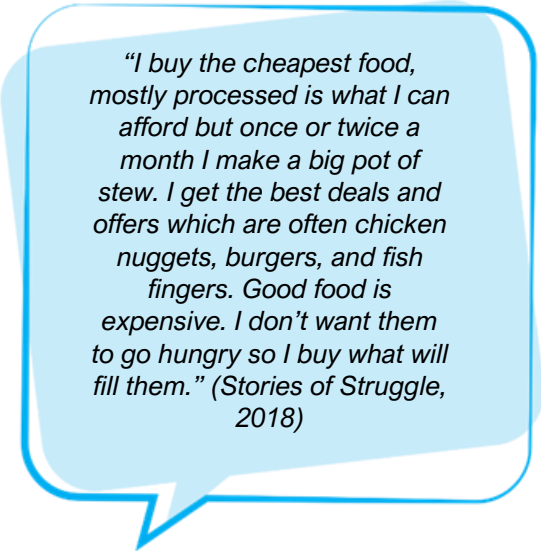
It is SVP members’ experience that food is what families on low incomes cut back on when times are tough, as it is easier to control than the cost of rent, utilities, or education. Rising housing costs means more households are now going without or are being forced to opt for low cost and high calorie food with little or no nutritional value. That’s why approximately one in three calls to SVP are related to food poverty.

Safefood Ireland, in conjunction with The Vincentian Partnership for Social Justice, published a report which examined the cost of a healthy food basket for six household types in the

Republic of Ireland.⁴⁵ As well as basic food costs, the Healthy Food Basket includes occasional ‘café, take-away, etc.’, and to provide ‘extra for visitors. This ensures that the social and cultural aspects of food are reflected in the healthy food baskets, and the households can participate in activities and practices considered a normal part of everyday life.

The findings showed that some families on low income need to spend up to one third of their income to afford a basic healthy food basket. They found that households with older children must spend significantly more to afford an adequate diet. Rural households also must spend more as it is not always possible to take advantage of deals and offers in larger supermarkets due to transport issues. Households where the only income was from social welfare spent a larger percentage of income on food than those households where one adult is in employment.

The report found that the cost of food has decreased in recent years, but we know that the inability to access a healthy diet is a complex issue that incorporates issues of low income, lack of transport and the cost of education, housing, and utilities.



“I buy the cheapest food, mostly processed is what I can afford but once or twice a month I make a big pot of stew. I get the best deals and offers which are often chicken nuggets, burgers, and fish fingers. Good food is expensive. I don’t want them to go hungry so I buy what will fill them.” (Stories of Struggle, 2018)

The long-term health and well-being impacts of food poverty cannot be underestimated. Food poverty can result in a poor diet, which is linked to diet-related ill health.⁴⁶ It can also impact children’s social, emotional, and educational outcomes.⁴⁷ When children go to school hungry their well-being, concentration, behaviour, learning, and motivation are affected. This has longer term implications for their educational progression and attainment.

The School Meals Programme can be a key part of the response to food poverty and the positive impact of the hot school meals programme is well documented. We note that in the

⁴⁵ Safefood and the Vincentian Parentship for Social Justice (2021) What is the cost of a healthy food basket in Ireland in 2020? <https://www.budgeting.ie/publications/what-is-the-cost-of-a-healthy-food-basket-in-irela/>

⁴⁶ Gundersen, C. and Ziliak, J.P., 2015. Food insecurity and health outcomes. *Health affairs*, 34(11), pp.1830-1839.

⁴⁷Ke, J., & Ford-Jones, E. L. (2015). Food insecurity and hunger: A review of the effects on children’s health and behaviour. *Paediatrics & child health*, 20(2), 89–91. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4373582/>

evaluation of the hot school meals pilot programme published in 2020, over a third of parents say that the hot meals pilot project had a very positive impact on their child's attendance at school, physical health, and psychological wellbeing.⁴⁸ Amongst teachers/SNAs, with two-thirds (66%) saying it had a positive impact on children's diet and eating habits. Just over half say the pilot project positively impacted children's behaviour, attentiveness, and psychological wellbeing. Importantly, 63% of teachers, SNAs and principals say the programme should be universally provided to all children. SVP believe that access to hot school meals should form a part of the education system and be rolled out universally to meet the needs of all children in a non-stigmatising way.

At the same time as addressing the immediate needs of children in school and other settings such as early years and youth clubs, it is critical that we look at longer term solutions that tackle the underlying causes of food poverty such as low income, high living costs and poor service provision in rural and deprived areas. It is critical that a new child poverty plan is ambitious, properly resourced and deals effectively with the issues of low pay, the adequacy of social welfare, and the accessibility and affordability of public services. Otherwise, food poverty will continue to impact large sections of Irish society.

Recommendations for Adequate Nutrition:

- **Recognise the drivers of food poverty and set a target to benchmark social welfare payments and the national minimum wage against the cost of the Minimum Essential Standard of Living.**
- **Develop and rollout a national action plan to ensure that all children have access to a hot nutritious meal every day in education settings. The action plan should include annual targets including sub-targets for the named groups of children in the EU Child Guarantee without creating stigma.**
- **Expand access to a hot meal to non-formal education settings incrementally over a number of budgets. This should include early years settings, youth and alternative education settings.**

⁴⁸ Mcshane, I. and Joyce, R. (2020) Hot School Meals Pilot Project: Main Report July 2020
<https://www.gov.ie/en/publication/a9bfb-school-meals/>

Gap in the EU Child Guarantee

Although the Child Guarantee is comprehensive and has the potential to make a significant difference in the lives of children experiencing poverty, we identify two gaps that will limit its potential. It is critical that these are addressed in an overarching strategy on child poverty as outlined above.

The Important Role of Income and Parental Employment

While access to quality services is critical to break the cycle, income remains vital in the fight against poverty. The pandemic put into sharp focus the importance of a strong safety net and why we need to make sure our social protection system works for everyone. Currently it is not meeting the needs for many – a lone parent with two children has a weekly shortfall of €82 between their income and the cost of a minimum essential standard of living. For families caring for someone with a disability, the gap will be much larger due to the extra costs of a disability.

A Minimum Essential Standard of Living is one which meets the minimum needed to live and participate in Irish society and is a standard of living which no one should be expected to live below. The MESL analysis finds that one parent household compositions and single adults continue to demonstrate the greatest rates and depth of income inadequacy. In 2021, the gap between the social welfare income of a one parent household with a primary school and secondary school aged children is €80 every week.

While MESL data has shown that recent budget increases to the QCI have led to improvements in adequacy for some household types, the Vincentian Partnership for Social Justice conclude that ‘child poverty and income inadequacy can only be fully addressed when the minimum needs of the entire household are considered.’ Committing to benchmark social welfare to an adequate level would ensure children have their basic needs met and are not excluded. An adequate income would allow families to plan for the future and provide an anchor for parents to access training, education and good quality jobs. Extra supports are also needed for one parent families and those families caring for someone with a disability. Lone parents continue to be the group we help most often at SVP, a longstanding situation that reveals systemic injustice that must be tackled. Over 45% of lone parent families experienced deprivation in the last year for which we have data, and

lone parent families are over-represented in family homelessness. ESRI research has shown that tackling poverty in one parent families is vital to reducing child poverty rates.⁴⁹

This level of financial strain points towards inadequacy of rates in the social welfare system in protecting people from poverty. Recently published research has examined the extent of the additional costs faced by people living with a disability which has been calculated at €9482 and €11734. It is critical that families caring for person with a disability are given support with these extra costs.

A living wage, free childcare for low-income families and more flexible work arrangements would allow parents to build a better life for their children. Importantly, for parents who can't work full-time due to caring responsibilities, we need to have a social protection floor that allows families to live with dignity.

Recommendations for a new National Child Poverty Strategy:

- **Benchmark social welfare rates and the national minimum wage to the cost of the Minimum Essential Standard of Living.**
- **Support one parent families through the provision of adequate, comprehensive, and streamlined in-work income supports and an effective system of child maintenance.**
- **Introduce a cost of disability payment.**

Providing Access to Affordable Transport

The lack of public transport in rural communities makes it very difficult for families to avail of public services, employment opportunities, healthcare and recreational activities and is recognised as a key contributor to social exclusion.⁵⁰ A lack of transport particularly impacts on low-income households, and families with a disability who may not have access to a car and depend on public transport.⁵¹

As well as increasing the rise of social exclusion, a lack of public transport can also hinder a family's ability to make ends meet. The additional costs faced by households living in rural

⁴⁹ Maître, B. Russell, H. and Smyth E. (2021) The dynamics of child poverty in Ireland: Evidence from the Growing Up in Ireland survey. <https://www.esri.ie/publications/the-dynamics-of-child-poverty-in-ireland-evidence-from-the-growing-up-in-ireland>

⁵⁰ Julian Hine (2007) "Transport Disadvantage and Social Exclusion" Presentation to International conference on public transport and urban citizenship, Trinity College, Dublin 21st September 2007. https://www.tcd.ie/policy-institute/assets/pdf/Julian_Hine.pdf

⁵¹ National Disability Authority (2007) Transport and access for people with disabilities <http://nda.ie/Image-Library/PDF-Downloads/Transport-and-disability-by-geographical-area-pdf.pdf>

areas has been extensively researched by the Vincentian Partnership for Social Justice. This research shows that households in rural areas have different and additional needs to meet the same socially acceptable minimum standard of living as households based in urban areas. Core costs (before housing) are generally higher in rural areas, primarily due to additional costs related to transport and home energy. For rural households' private transport is a minimum need, as public transport options are limited and do not tend to offer an adequate level of service to rely on to meet all transport needs.⁵² Their research finds that car related costs (fuel, maintenance, insurance, etc.) add an additional €59, per week.

Currently, there is little visibility of the needs of low-income households or children in national transport policy. In Scotland, the independent Poverty and Inequality Commission which advises the Government on policy, recently recommended that a rights-based approach is incorporated into transport policy. This approach would recognise that access to suitable transport, no matter your level of income or where in you live, is a necessary requirement in order to achieve other human rights such as the right to work, right to education, right to take part in cultural and public life, and right to the highest attainable standard of physical and mental health.⁵³

Recommendations for a new National Child Poverty Strategy:

- **Child and poverty proof transport policy ensuring the needs of children, parents and young people living in poverty are met in the design of integrated systems of public transport in rural and urban areas.**
- **Invest in the Rural Transport Programme, increasing the range of public transport options, promoting social inclusion for children living in rural areas, and improving access to services.**
- **Provide free school transport to all eligible children**
- **Increase funding to the school transport scheme to support and facilitate access to sports, play, recreation, and activities for children in isolated areas.**
- **Optimise the use of the school bus fleet by mobilising it for use in the summer months and outside of school times.**

⁵²Vincentian Partnership for Social Justice (2019) Minimum Essential Standard of Living 2019: Update Report. <https://www.budgeting.ie/publications/mesl-2019/>

⁵³Poverty and Inequality Commission (2019) Transport and poverty in Scotland: Report of the Poverty and Inequality Commission. <https://povertyinequality.scot/wp-content/uploads/2019/06/Transport-and-Poverty-in-Scotland-Report-of-the-Poverty-and-Inequality-Commission.pdf>