

Public Consultation on the development of the Department of Social Protection’s Statement of Strategy 2025-2028

Submission by Care Alliance Ireland

March 2025

We are pleased to make a submission to the Department of Social Protection’s Statement of Strategy 2025-2028. We previously made a submission to the Department on the topic of the two previous terms’ Strategy (2020-2023 and 2023-2026), which are available to view on our organisational website¹.

We see the ongoing relevance of the existing mission of the Department: “*To promote active participation and inclusion in society through the provision of income supports, employment services and other services*”. It is the opinion of Care Alliance that this is a worthy mission and one which can be achieved for family carers by ensuring that they remain a key client group in any, and all, considerations by the Department going forward.

The 2025 Programme for Government is clearly a guiding document for the Department, and can help encourage a whole system approach to the support of family carers. We note there are a number of actions within the Programme for Government which will fall to the DSP for operationalisation;

- Commitment to increasing the income disregards for the means test for Carers Allowance; with a view to the abolition of the Means Test for Carers Allowance over the lifetime of the Government (P. 100)
- Commitment to increase weekly (Carers Allowance/Carers Benefit) and monthly (Domiciliary Care Allowance) carers payments (P. 100)
- Commitment to increase the Carer Support Grant (P. 100)
- Commitment to ensure parents who are aged 66+ and caring for children with lifelong disabilities retain the rate at which they are paid their Carer’s Allowance and concurrently receive the State Pension. (P. 100)

¹ <https://www.carealliance.ie/General-Submissions>

In addition, we understand that the focus of this Strategic Plan is overarching in nature, and that the actions will be applicable to multiple target groups of the Department, such as jobseekers, older people, etc. Many of the comments contained in this submission, whilst primarily cognisant of issues for family carers, will be beneficial to multiple target client groups.

Key Issues

1) Acknowledgement of Family Carers as a Core Group

We notice with disappointment that family carers are not included in the current Strategic Plan as a specifically delineated DSP client group (despite our previous representation on the matter in 2023, 2020 and 2016), those groups being limited to:

- Children and Families
- People of Working Age
- Employers
- Retired and Older People.

It could be argued that family carers are included within each of these target groups (see point 2 below for further details); however, we continue to advocate for their inclusion in the upcoming Plan for 2025–2028 in their own right. This is of particular significance noting the latest Healthy Ireland report of December 2024 where 14% of the aged 15 and over population report providing unpaid family care². This represents in the region of 600,000 individuals³, and a noticeable increase since the previous Healthy Ireland data. This makes family carers potentially one of the largest single client groups of working age within the social protection system. This is particularly the case with the Programme for Government commitment to increasing the income disregards for family carers, bringing more family carers into the social protection net.

The National Carers Strategy (2012) remains the key guiding policy document regarding family carers, although it very much needs updating and refreshing. It contains multiple actions regarding the need to acknowledge the contribution of and the unique challenges faced by family carers. To date, the Department of Social Protection has been one of the most engaged departments regarding the actions contained within the National Carers Strategy. Including family carers as

² Department of Health, "Healthy Ireland Survey 2024 Summary Report" (Government of Ireland, 2024).

³ Using most recent CSO population estimates for population aged 15 and over

a key client group within the departmental strategy would go further towards meeting those actions in the spirit of the strategy.

The naming of family carers as a specific group would give expression to the existing language within the Programme for Government (2025), where a specific commitment is made to '*enhancing the supports*'⁴ available to family carers.

2) Acknowledge the ways in which family care intersects with other issues under the remit of the DSP

There continues to be a lack of sufficient understanding at policy level that family care is not a distinct and standalone issue facing individuals, but intersects with multiple other issues, and across family systems, to create a significant web of potential disadvantage. This was made particularly clear following the announcement of the different 'cost of living' payments as initially announced in Budget 2022 (which have continued in subsequent Budgets). Whilst these payments are welcome, given the considerable additional costs of disability and caring⁵, we were very disappointed that family carers who are disabled, and consequently more significantly at risk of economic disadvantage, were not entitled to both payments, but only one. This suggests a true lack of sufficient understanding of the potential intersectionality of both family care and disability within Government, and in particular within the DSP.

This is not merely of relevance to disability and caring, but to all four of the key client groups identified in the current strategy outline above. Delineating such client groups is of course necessary in order to streamline services for clients of the DSP. However, failing to acknowledge the overlaps and intersections between all these groups only contributes to the risk of siloed policy analysis and subsequent decisions. This is an ongoing issue that we and other organisations in the not-for-profit sector have called attention to in the past. Such a siloed approach creates considerable barriers to combatting the key challenges faced by individuals most at risk of disadvantage⁶.

⁴ Pg 100

⁵ **Bernadette MacMahon, Hannah Boylan, and Robert Thornton**, "*Care at Home: Costs of Care Arising from Disability*" (Family Carers Ireland, 2022); **Indecon International Research Economists**, "*The Cost of Disability in Ireland*," 2021; **John Cullinan**, "The Economic Costs of Disability for Families," *Frontline: The Irish Voice of Intellectual Disability*, no. 97 (2015).

⁶ **Diarmaid O'Sullivan**, "*Mind the Care Gap - Exposing the Health System's Vulnerability to the Gap between Family Care Provision and Anticipated Demand*." (Oireachtas Library & Research Service,

We recommend that the DSP commit, within their 2025-2028 strategy, to undertake a course of education and training for all staff to understand this intersectionality in order to better understand those individuals falling within the remit of the Department. This will also enable more comprehensive supports for those most at risk of significant poverty, which is a key responsibility of the Department at large.

3) Specific Reflections on Actions from 2023-2026 Strategic Plan

As previously noted above, we would like to reiterate that of all the Departments which has a remit in the supply of supports for family carers, the DSP remains one of the most positive departments to work with. We have continual, reciprocal discussions with relevant Departmental representatives throughout the year which enables us to address issues arising for the family carers we work with on a continual basis. This is very much appreciated.

With that in mind, there are two points from the current 2023-2026 Strategy which we must comment on in order to continue this relationship.

a) Strategic Objective 1 – Put the Customer at the Centre of Policy & Service Delivery; Promoting active participation in society as well as supporting employment as a way out of poverty.

Family carers remain the only customer of the DSP who must essentially work in order to receive their social protection payments – by having to show proof of providing care to a certain level, precluding them from working in excess of 18.5 hours per week. As referenced above, there is a considerable additional cost of disability and caring, which is a key reason that disabled people, and family carers are pushed further into poverty. It is important to continue to highlight that family carers and other customer groups of the DSP are to be supported to participate in society through caregiving, volunteering and other suitable means. We in Care Alliance Ireland have supported the creation of a Basic of Participation Income for family carers (initially brought forward by our colleagues in Family Carers Ireland⁷) for a number of years.

2019); **Care Alliance Ireland**, "Disability and Family Carer Policy - Challenges and Responses." (Care Alliance Ireland, 2017).

⁷ **Mary Murphy, Pauline Cullen, and Shane Gough**, "Towards a Participation Income for Family Carers," 2023.

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b) Strategic Objective 1 – Put the Customer at the Centre of Policy & Service Delivery; respond promptly to queries received from customers and their representatives.

When we in Care Alliance request information from officials within the DSP, we are consistently met with prompt and comprehensive answers, which we very much appreciate. However, we continually receive feedback from family carers that while most of the DSP staff who answer queries via the phone helplines in particular are helpful and empathetic, there are consistent reports of misinformation being passed on through these avenues. Two individuals asking the same question can (and have) received different answers from different frontline staff members.

We understand that human error is natural, and mistakes can be made, it is important that in this specific action it is not simply prompt responses which are necessary, but accurate responses also. Any family carer that we have spoken to in this situation, who has received inaccurate information, would have preferred to be told that the information was not available, or that the staff member did not know but would find out the correct information for them. Prompt responses are appreciated, but accurate responses are more valuable. Therefore, we recommend including a key outcome regarding accuracy of information in this regard to the Strategy.

Conclusion

This submission has outlined 3 key points of direct relevance to the development of the next Strategic Plan of the Department of Social Protection. We have focussed on issues of strategic relevance to family carers in Ireland which directly fall under the purview of the Department of Social Protection.

Family carers contribute upwards of €20 billion worth of care every year⁸, and they remain the only departmental clients who are required to work full-time (through the provision of care) to receive a welfare payment. It is crucial, therefore, that family carers are seen as central to the work of the Department.

We remain available to the Department for further information on the points made within this submission, or other issues relating to family carers.

⁸ Family Carers Ireland, "Counting Carers: Carer Prevalence in Ireland - Working Paper 1" (Family Carers Ireland, 2021).

About Us

Care Alliance Ireland works to **enhance the wellbeing of family carers** so that they are better able to care for their loved ones. We provide direct support to family carers as well as indirectly supporting them by working with researchers, statutory actors and other not-for-profits.

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