



Observations:
Department of Employment Affairs and Social Protection
Statement of Strategy 2020-2023

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Rialtas na hÉireann
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1. Introduction

Age Action welcomes the opportunity to input into the development of the Statement of Strategy 2020-2023 of the Department of Employment Affairs and Social Protection. It does so understanding that Ireland needs to plan for an ageing population that will see the number of people aged over 65 increase to close to 1.4 million by 2041,¹ from one-fifth to over one-third of the working population over the next two decades.

In making these observations on the next Statement of Strategy, Age Action draws on the statutory obligation on public bodies to eliminate discrimination, promote equality of opportunity and protect the human rights of those to whom they provide services and staff when carrying out their daily work under the Public Sector and Human Rights Duty.² We welcome it's role to place 'equality and human rights at the heart of how a public body fulfils its purpose and delivers on its strategic plan'.³

Age Action believes that we should have a choice to age in place which means the creation of age friendly environments, having access to adequate income supports and the provision of support services locally. Central to supports for an ageing population is the role of social protection and labour activation measures in helping people to have a standard of living in older age that affords us dignity.

The Department's stated mission is to 'promote active participation and inclusion in society through the provision of income supports, employment services and other services.' The aim of social protection supports is to protect those in the most vulnerable situations. Prior to the pandemic we saw that people over the age of 65 in Ireland had the largest year-on-year rise in being at risk of poverty. There was an increased number of over 65s either at work or looking for work to support their income, with similar increases for those in the labour market aged 60-64 and 55-59. It is reasonable to assume that these figures were exacerbated by COVID-19 and as we look forward to 2023, it is crucial that older people are not further left behind, that older people are actively included in recovery planning and that pre-existing inequalities are addressed.

Older people are not a homogenous group. Public policy must recognise the diversity of experience and situation of older people. A failure to adequately plan for our changing population has now placed many older people in precarious and vulnerable situations, with groups living on an inadequate income and without access to the supports that they need. COVID-19 has disproportionately impacted older people, with people aged over 65 accounting for 19% of all COVID-19 cases, 53% of all hospitalised cases, 37% of ICU admissions and 93% of all COVID-19 related deaths.⁴ Many older people lost their jobs or were unable to work during COVID: 14% of over 65s saw their employment affected. While eligible according to normal criteria for the

¹ See http://rebuildingireland.ie/Rebuilding%20Ireland_Action%20Plan.pdf

² Set out in Section 42 of the Irish Human Rights and Equality Commission Act 2014.

³ IHREC (2019) *Implementing the Public Sector Equality and Human Rights Duty*. Available at www.ihrec.ie.

⁴ Based on the cases up to midnight 6/10/20. See www.hspc.ie.

Temporary Wage Subsidy, older people who had lost their jobs during the pandemic were prohibited from availing of the Pandemic Unemployment Payment or associated restart grants. Of concern, some 70% of people on the State pension did not qualify for the welcome extra weeks of fuel allowance provided during COVID-19.

As we move forward to design, plan and implement activities under the new Departmental Strategy, it is important that the meaningful participation of older people is embedded across policies. By adopting a human rights-based approach to policy development, this direct participation will be enabled, and the policies will better meet the need of those they seek to affect.

There are a number of existing commitments to social protection and employment supports and planning in older age, including the Programme for Government, the National Positive Ageing Strategy, the Roadmap for Pension Reform 2018-2023 and the Roadmap for Social Inclusion 2020-2025. Age Action urges the Department to embed these existing commitments in their new Statement of Strategy in order to provide a clear framework for their prioritisation and delivery. Without urgent resourcing and delivery on the existing commitments, the ability of people in older age to live with dignity, above the poverty line and with timely access to the supports they need is severely undermined.

2. Context

2.1 Policy Context

Adequate income and employment supports for older people remains a priority policy issue as the population continues to age.

The Programme for Government recognises the importance of planning to meet the needs of an ageing population, including the establishment of a Commission on Pensions and a Commission on Welfare and Taxation, and to enable a culture of lifelong learning within the workforce.⁵

The National Positive Ageing Strategy in 2013 sets out what Government departments and public agencies must do to make Ireland a great place in which to grow old.⁶ There are four goals underpinning this vision with specific actions under Goals one and three directly attributed to the then Department of Employment Affairs and Social Protection.

- Goal 1 of the strategy aims to ‘remove barriers to participation and provide more opportunities for the continued involvement of people as they age in all aspects of cultural, economic and social life in their communities according to their needs, preferences and capacities.’⁷ Objective 1.1 of this goal addresses the issue of developing options for employment and training for older people as well as removing barriers that prevent longer working lives.
- The strategy goes on to state that there is ‘evidence that longer working lives have beneficial effects on individuals’ physical and psychological wellbeing.

⁵ Government of Ireland (2020) *Programme for Government, Our Shared Future*.

⁶ Department of Health (2013) *National Positive Ageing Strategy*. Available at www.health.gov.ie.

⁷ *Ibid*.

Some evidence also shows that workers' productivity does not necessarily decline with age - any decline in physical capacity is easily compensated by qualities and skills acquired through experience.

- As mentioned above the strategy identifies the removal of “any barriers (legislative, attitudinal, custom and practice) to continued employment and training opportunities for people as they age” as the first objective under National Goal 1 of the strategy.
- Goal 3 is also relevant to the Department as it commits to ‘enable people to age with confidence, security and dignity in their own homes and communities for as long as possible. Objective 3.1 says that this is to be achieved by providing ‘income and other supports to enable people as they age to enjoy an acceptable standard of living’, with specific actions in relation to pensions, secondary income supports, poverty reduction and occupational and private pensions.

The Roadmap for Pension Reform 2018-2023 made a number of commitments including to benchmark and index the State pension, introduce a Total Contributions Approach to the State pension, introduce a system of autoenrolment and to review the conditions to enable fuller working lives.⁸

The Roadmap for Social Inclusion 2020-2025 also contained a number of commitments across the poverty, social inclusion and engagement framework including a commitment to provide income security for older people, to reduce poverty and to extend employment opportunities to all who can work as well as ensuring the pay and conditions are fair. Of note is the commitment to enabling active participation and engagement in society.

2.2 Demographic Context

According to the most recent 2016 Census figures, the number of people aged over 65 saw the largest increase of population since 2011. This age group has increased since 2011 by 19.1% (to 637,567). The number of people aged over 85 increased by 15.6% (to 67,555).⁹

At present, just over 13% of the total population is over 65 years of age.¹⁰ Each year in Ireland, the over 65 age group increases by 20,000 people.

The number of people aged over 65 is projected to increase very significantly to close to 1.4 million by 2041,¹¹ from one-fifth to over one-third of the working population over the next two decades. The Department of Health's Capacity Review outlines that, on the basis of the CSO's moderate population projection scenario (M2F2), the 65-74 age cohort will increase by 42.9%, the 75-84 age cohort will see an increase of 75.9% and the 85+ cohort will see an increase of 95.5% by 2031 from 2016 figures. Regional

⁸ The Roadmap contains a commitment to benchmark the State pension to 34% of average earnings for the State pension, with future increases to depend on the Consumer Price Index (CPI) or average wages.

⁹ See

<http://cso.ie/en/media/csoie/newsevents/documents/pressreleases/2017/prCensussummarypart1.pdf>

¹⁰ See <http://www.cso.ie/en/releasesandpublications/er/q-cv/qnhscimeandvictimsationq32015>

¹¹ See http://rebuildingireland.ie/Rebuilding%20Ireland_Action%20Plan.pdf

projections for 2016-2031 show the number of older persons (over 65) will almost double in every region over that time period.¹²

Of note and applicable to the provision of services and policy planning is the low rate of digital access of older people due to skills and affordability. We know that older people are currently less likely than people of other ages to use the internet or to have good digital skills. While there has been an increase in those aged 55-74 who are online in recent years, this group largely has below basic digital skill levels¹³ which means they are unlikely to be able to use the internet independently or safely: 43% have digital skills below basic levels, and 24% have never been on the internet.¹⁴ It is estimated 50% of over 70's in Ireland have never used the internet.¹⁵ A third (33%) of those aged 60-74 in Ireland have never been on the internet.¹⁶

3. Recommendations

For the purpose of assisting in placing the below recommendations in context, they are framed in the previous continuous Department objectives of:

- Objective 1: Put the Client at the Centre of Services and Policies
- Objective 2: Drive Cost Efficiency and Effectiveness
- Objective 3: Develop Staff, Structures and Processes

Objective 1: Put the Client at the Centre of Services and Policies

Recommendation 1: Include a commitment in the new Statement of Strategy to adopt a rights-based approach to planning, design and delivery within the Department to enable the participation of people in the design, implementation and monitoring of decisions that affect their lives

Age Action supports and advocates for equality and human rights for all older people. Everything we do is based on a recognition of the diversity of identity and situation among older people and a concern for equality for all older people.

We need evidenced based policies that respond to the needs of people who are affected by them, which is why broad stakeholder participation in their design and implementation is critical.

To ensure the voices of all are represented and reflected in planning, we urge the new Strategy to return to the principles of consultation and partnership evident in earlier Statement of Strategies, and to commit to meaningful engagement with those offline

¹² See <http://www.cso.ie/en/releasesandpublications/er/rpp/regionalpopulationprojections2016-2031>

¹³ Eurostat defines basic digital skills through a competence framework that can be simplified as: being able to find information about goods and services, send an email, buy something online and use word processing software. https://ec.europa.eu/eurostat/cache/metadata/en/tepsr_sp410_esmsip2.htm

¹⁴ Eurostat (2019) *Digital skills: Individuals level of digital skills*. Available at: <https://ec.europa.eu/eurostat/web/digital-economy-and-society/data/database>

¹⁵ Central Statistics Office (2020) *Impact of COVID-19 on ICT usage by Households*. Available at: <https://www.cso.ie/en/releasesandpublications/ep/p-ictc19/impactofcovid-19onictusagebyhouseholds/frequencyofinternetusage/>

¹⁶ Eurostat (2019). *ICT usage in households and by individuals: Individuals: Internet use*. Available at: <https://ec.europa.eu/eurostat/web/digital-economy-and-society/data/database>

and across age cohorts. This is important in the context of the design, implementation and evaluation of new measures and policies as well as how services are provided. It is vital that this principle of a rights-based approach to consultation and participation also includes participation of civil society organisations in the co-design and implementation of public policies. There are good practice examples in recent consultations such as the efforts to advertise the autoenrolment consultation in local media, receiving offline submissions and holding local consultation fora around the country.

This principle is of particular relevance for the Department of Employment Affairs and Social Protection as it engages directly with the majority of older people in Ireland, including at offices throughout the country or through phonelines. COVID-19 has highlighted the difficulties in accessing statutory services for many of those who are not digitally literate (or comfortable online) or who have additional communication needs: from information provision, accessing supports or addressing queries.

An example of how to address this is to further examine how Department services and official materials such as forms and information are available offline for those who do not use the internet or who can access only on smartphone devices. Without these measures in place, barriers remain for a cohort of people to have full access to Department supports and advice.

We were pleased to see commitments in the Roadmap for Social Inclusion 2020-2025 to a range of issues including social participation and to encourage active citizenship. Age Action encourages embedding this commitment in the Departmental strategy through stated commitments to effective and meaningful public and civil society engagement, such as a commitment to actively enabling off-line engagement for all public consultations and to feed into continuous feedback and annual scorecards.

Recommendation 2: To prioritise the delivery of existing Government commitments in the Statement of Strategy, such as the Programme for Government, the National Positive Ageing Strategy, the Roadmap for Pension Reform 2018-2023 and the Roadmap for Social Inclusion 2020-2025

Age Action was pleased to see a number of commitments in the Programme for Government related to the State pension, most notably the commitment to defer the 2021 planned increase to the qualifying age and the establishment of a Commission on Pensions to outline options to address issues including eligibility and payments. It is crucial that any such Commission adequately consults with those most directly impacted upon when conducting its review.

We note that that the Programme for Government commits to protect core weekly social welfare rates and are pleased to see reference to the importance of secondary benefits and eligibility criteria for vulnerable groups.¹⁷ Many older people's concern about a rising cost of living is exacerbated each year by the uncertainty surrounding the annual review of pension and secondary benefit changes in the politicised

¹⁷ Government of Ireland (2020) *Programme for Government Our Shared Future*.

Budgetary process. We were also pleased to see commitments to a 10-year literacy and digital skills strategy, and a commitment to a Just Transition.

The new Departmental Statement of Strategy must focus on the urgent implementation of the existing commitments across all relevant Government strategies. Currently, it remains unclear as to the status of assigned timeframes for crucial pension and poverty measures under both the Roadmap for Pension Reform 2018-2023 and the Roadmap for Social Inclusion 2020-2025. Many of these designated timeframes have not been met at the time of writing e.g. the roll out of the Total Contributions Approach was due Q3 2020 based on legislation brought forward in Q1 2019, legislation to give effect to the new autoenrolment system was due in Q1 2020, and a formal benchmarking and measures to index link the State contributory pension from the end of 2018 in the Pensions Roadmap and Q1 2020 in the Roadmap for Social Inclusion. Age Action continues to receive calls from many of those due to retire in the coming months and years who simply do not know which State pension system they can expect to retire under or what they can expect to receive. It is vital that these commitments are prioritised and met with clear timeframes in the detail of the new Statement of Strategy.

Recommendation 3: To integrate a plan for pension reform with clear guidelines for participation and timelines to allow people to adequately plan for their retirement

Prioritisation of pension reform in the new Statement of Strategy is needed. Currently there is little clarity available on the terms and conditions of the pension commitments outlined – and restated - in the Programme for Government extending across State pension eligibility, rates and autoenrolment and through measures such as the Commission on Pensions and legislation needed to give effect to existing pension commitments.

We remain concerned that concrete and accessible information on new pension measures have not been communicated, especially to those coming close to retirement. Looking at the new autoenrolment and total contributions approach systems in particular, further consultation, adequate guidance and most importantly sufficient time is needed for those most affected to be informed about the wide-ranging new changes so that they may plan accordingly.

Older people are not a homogenous group; some people may want to continue working longer, others will not have the choice because they are unable or cannot afford not to work. All of these issues that face older workers need to be considered for the pension system to work for them. We welcome the commitment to introduce a system to enable people to defer receipt of their State contributory pension on an annual basis and to help facilitate the making of extra PRSI payments beyond pensionable age for those without a full social insurance record who wish to increase their retirement provision.

Budgetary decisions over the previous 10 years have left many older people today

with social protection income not meeting their cost of living. The rate of inflation rose by 7.5% from January 2010 to January 2020. Looking at cumulative changes over the last 10 years, those in receipt of the top rate of the State pension and secondary benefits and living with someone else are receiving payments under the rate of inflation (between €4.01 - €4.76 below the rate of inflation). Core social welfare rates for this group have not risen in line with the rate of inflation.

Existing commitments in the various Roadmaps and the Programme for Government to benchmark and index pension rates must be integral to the new Statement of Strategy. We know that indexing of current and future pension rates facilitates proper planning, it provides peace of mind for older workers and crucially it depoliticises the budget process. This commitment in the Roadmap for Pensions Reform 2018-2023 to benchmark and index the State pension¹⁸ is also in the Roadmap for Social Inclusion 2020-2025 which sought to address this through the establishment of a pension rates commission and bring Ireland into step with most other countries in the EU that apply a formula for indexing the State Pension to some combination of prices, wages or GDP.¹⁹ A clear commitment and timeline to continue to work towards this 34% benchmark commitment is needed in the new Statement of Strategy. At current pension rates, benchmarking the State pension to 34% of the current average weekly earnings would provide older people with an additional €785 per year.²⁰

We know that many of those in retirement are without adequate coverage for their cost of living and rely solely or mainly on State pension supports. The aspiration should be for a State Pension that is above poverty line, that lifts them away from social exclusion and that enables older people to grow old with dignity. Many older people's concern about a rising cost of living is exacerbated each year by the uncertainty surrounding the annual review of pension and secondary benefit changes in the politicised Budgetary process: people do not know whether they will see any increase in these payments to help them keep pace with rising costs.²¹

The top rate of all current State pension contributions remains substantially below the at risk of poverty rate. The top rate of the contributory State pension sits at 32% of average earnings: this is a worrying 1.2% yearly drop on the 2018 figure and has fallen further below the 34% commitment in the Roadmap for Pensions Reform from 2018. The gender pensions gap remains at 35% and wider pension inequalities continue to

¹⁸ The Roadmap contains a commitment to benchmark the State pension to 34% of average earnings for the State pension, with future increases to depend on the Consumer Price Index (CPI) or average wages.

¹⁹ *Department of Social Protection presentation to the Joint Oireachtas Committee on Social Protection* (15 December 2016).

²⁰ CSO (2020) *Earnings and Labour Costs Annual 2019*. Available at www.cso.ie.

²¹ To remove the crucial support of the State pension from the changing nature of the annual Budget cycle and afford certainty to our older population, we urge the Government to consider applying a safeguard for annual indexes in the form of a triple lock which guarantees that the basic State pension will rise by a minimum of either 2.5%, the rate of inflation or average earnings growth, whichever is largest.

exist for those in low paid, part-time and precarious work throughout their working lives.

Recent CSO figures show that 40% of workers aged 20-69 had no supplementary pension coverage²² and it is reasonable to assume that they will be dependent on the State pension in retirement. For average earnings of €38,000, the Department of Employment Affairs and Social Protection estimates a replacement figure of 60% of earnings to achieve income adequacy in retirement. The current State pension rates reach just 57% of this replacement earnings figure leaving those reliant on welfare payments in older age in a particularly vulnerable position.²³

We welcome the reference in the Programme for Government provides for an 'Early Retirement Allowance or Pension' for those retiring aged 65,²⁴ however, concerns remain about anticipated gaps in payments and eligibility between the State pension and any early retirement allowance or pension paid on the same basis as Jobseekers Benefit, notably no eligibility for many secondary benefits. Clarity on this is urgently needed.

Recommendation 4: Include a commitment in the new Statement of Strategy to review income adequacy levels for older people within the framework of poverty reduction targets and a framework for Social Inclusion

Without knowing the true cost of ageing for disparate groups in older age, it is not possible to assess whether current income supports meet the true cost of living in older age.

Looking at income pre-COVID-19, latest EU SILC statistics poverty data showed us that those aged over 65 were showing the slowest recovery still from the Recession with an extra 20,000 people being at risk of poverty year-on-year and showing 11.4% of people aged 65 years and over were 'at risk' of poverty in 2018.

The new Statement of Strategy needs to commit to reviewing the cost of ageing in Ireland and whether social protection supports meet this need.

We know that inequality experienced by many older people reflects a cumulative disadvantage as a result of a lifetime of factors including socio-economic status, race, age, disability, gender, and geography. Identifying structural inequalities — such as the disproportionate burden of unpaid work that falls on women, gender inequality in the pension system, child poverty and homelessness — and building cross-society collaboration to address them — will benefit us all as we age. Policies on income are currently made in the absence of a detailed analysis of the cost of ageing, and therefor

²² This includes occupational pension coverage from current or previous employments, and personal pension coverage including those where payments have been deferred for a period of time or are currently being drawn down by the pension holder. CSO (2020) *Pension Coverage 2019*. Available at www.cso.ie.

²³ Based on average earnings of €38,000, with the state pension replacing approximately 34% of earnings.

²⁴ Available for those aged 65 and to be paid at the same rate as Jobseekers Benefit without a requirement to sign on, partake in any activation measures or be available for and genuinely seeking work. See Government of Ireland (2020) *Programme for Government Our Shared Future*.

questions remain about whether welfare supports through the annual budgetary process are adequate to meet people's needs. Welcome work by the Minimum Essential Standards of Living (MESL) cost analysis shows the level of income adequacy for groups – including pensioners – across society, however it must be noted that the data is based on the assumption of someone in good health, without any care needs and living in social housing which is reasonably insulated and energy efficient.

While there has been an assumption that older people close to, and in receipt of, the State pension age are generally mortgage-free home owners, it is clear that this is no longer true with many still carrying large mortgages, in mortgage arrears or living in precarious private rentals with no security of tenure in older age. Census 2016 showed us that 22,674 of over 65 households still had a mortgage. Data released for the first time by the Central Bank of Ireland in 2019 showed over 20,000 over 50s were in mortgage arrears; over 7,000 of this number aged 60-69, over 2,000 aged over 70.²⁵

Over the last months in particular, Age Action received almost daily calls and contacts from those in receipt of the State pension who had lost their jobs and were worried about how they would meet their cost of living. Many more told us that they did not have the financial bandwidth during COVID-19 to meet the hidden costs of self-isolation, care costs and additional costs.

Following the announcement of Budget 2021, we have seen that the State pension had not kept pace with the cost of living in recent years: Budget 2021 saw no change to the State pension, a small increase to the Living Alone Increase and an overall increase of €1.88-€6.88 to the weekly income of older people in receipt of all main benefits year-on-year.

A 2019 paper by Social Justice Ireland detailed the role that social welfare plays in lifting over 65s out of poverty: EU SILC data showed that in 2009 (last year measured), poverty among those aged 65 plus fell from 88% to 9.6% once social welfare payments were included.²⁶ It noted that those post-retirement have experienced 'the greatest volatility in their poverty risk rates' across the years surveyed (1994-2017)²⁷

The latest OECD Pensions at a Glance report states that the incomes of older people are on average lower than those of the population, even when differences in household size are taken into account. Ireland is slightly below the OECD average with the income of those over 65 years reaching 84.1% of the total population income compared to the 87.4% OECD average for this figure. It found that over three-quarters

²⁵ Irish Times (18 November 2019) 'Mortgage arrears may follow 20,000 into retirement'. Available at www.irishtimes.com.

²⁶ These were not updated in subsequent CSO publications.

²⁷ Social Justice Ireland (2019) *Indexation of Social Welfare Rates Review and further proposals by Social Justice Ireland*. Available at <https://www.socialjustice.ie/sites/default/files/attach/publication/5752/2019-03-26-indexationandsocialwelfarewithcover.pdf?cs=true>.

of older people's income is from public transfers, far higher than the OECD average of 55%.²⁸

Data consistently showing us that older people living alone are particularly vulnerable to income inadequacy. ESRI²⁹ research showed that when it comes to older people, while only 6% of retired adults report being unable to keep their homes adequately warm, over 40% would be considered to be living in fuel poverty as per the 10% energy poverty measure.

For the system to work cohesively to protect against poverty, it is crucial that the new Statement of Strategy explicitly commits to ensuring that any social welfare payment increases are reflected in corresponding threshold increases across all Departments.

Objective 2: Drive Cost Efficiency and Effectiveness

Recommendation 5: To include the needs of our ageing population in the commitments to labour market active participation, specifically around mandatory retirement, activation measures, skills training and supports to develop age-friendly workplaces

In the context of an ageing population and a rising pension age, more people are choosing or are compelled to work for longer whether for social engagement or economic necessity.³⁰ The Future Jobs Ireland 2019 strategy explicitly notes that '...as people are living and working for longer, we must have a labour market welcoming of older workers.' It is vital that the new Statement of Strategy details initiatives that provide for supports in the labour force and for skills training for older workers.

Many older people want to continue working but fall victim to ageism and discriminatory mandatory retirement clauses.

Planning for an age friendly society includes developing a coordinated response across all policy areas. It must ensure that employment legislation supports older workers and that retirement practices and policies enable older people to have a choice around when they stop working. In the current system – and with no targeted Government interventions - skilled, experienced employees against whom there is no suggestion that they cannot carry out their duties are losing their jobs. This permitted practice contributes to the ageist narrative around older workers and in many cases prevents people from exercising their wish to continue to work. The *Public Service Superannuation (Age of Retirement) Act 2018* provided for an increase in the compulsory retirement age of most pre-2004 public servants from age 65 to age 70. No similar work has yet taken place for private sector retirement contracts,

²⁸ OECD (2019) *Pensions at a Glance 2019*. Available at www.oecd.org.

²⁹ Bercholtz, M. and Roantree, B. (2019) *Carbon Taxes and Consumption Options*. Budget Perspectives 2020 Paper 1. Available at www.esri.ie.

³⁰ Census 2016 showed an increase in labour force participation for those over 65. Participation did vary by gender, with males aged 55-74 years showing increases in the labour force participation rate and those over 75 years seeing a small decrease. Similar patterns can be seen with female participation rates, however a very small increase in participation can be seen here for those over 85 years.

following guidance issued on longer working lives from IHREC during 2018.³¹ We urge the Department to commit to take action in the new Statement of Strategy on the remaining discriminatory mandatory retirement clauses in place for private sector workers, and to provide supports to both employers and employees in navigating this impetus to continued working.

We need to recognise the changing nature of work and of the labour market and for Government to support age-friendly workplaces. Age Friendly workplaces include introducing more flexible working, minimising age bias in recruitment and encouraging career development at all ages.³² Targeted commitments are needed for those from their mid-50s. Research shows that becoming unemployed over 55 is generally a 'one-way street'. Ireland has a higher than average rate of long-term unemployment for those aged 55-64 years. Older people have seen real increases in long-term unemployment and involuntary part-time work in the last decade, and without targeted supports, we risk condemning the next generation of 55-64 year olds to a similar struggle in the coming decade.³³ CSO data shows that 14% of over 65s and 46% of 55-64 year olds have had their employment affected by COVID-19.³⁴ The effects of COVID-19 on older people's employment came in the context of significant underemployment and long-term unemployment for this demographic: pre-COVID, 32% of 55-64 year olds already involuntarily worked part-time when they would like to work more, and 75% of unemployed 55-64 year olds were already long-term unemployed. These figures are far higher than the OECD averages of 20% and 46% respectively. In addition, of all those whose employment was affected by COVID-19, over 55s were most likely to have to take unpaid leave³⁵ which may reflect health and caring needs.

Age Action urges the Department to explicitly commit to supports for longer working lives in the new Strategy for both the public and private sector, such as re-training, redesigning jobs to meet physical needs, job transition support, career path re-design, part-time and job-sharing opportunities.

Many older workers – including callers to Age Action's Information Line - have indicated that flexibility would assist them in remaining in the work force. It is crucial that targeted education and training supports are offered to older members of the labour force. We are pleased to see reference in the Programme for Government for

³¹ IHREC (2018) *Retirement and Fixed Term Contracts*. Available at <https://www.ihrec.ie/app/uploads/2018/04/Retirement-and-Fixed-Term-Contracts-Guidelines.pdf>.

³² Centre for Ageing Better (2019) *Becoming an age-friendly employer*. Available at www.ageing-better.org.uk.

³³ Against the background of the last Recession, the incidence of long-term unemployment among unemployed 55-64 year olds has almost doubled from 2008-2015 (most recent figures). The incidence of involuntary part-time work in 55-64 year olds has also more than doubled in the last 10 years from 2008 to 2018. Again these shifts are significant in relation to OECD averages, which in contrast saw only very small changes in these figures across the same timeframes.

³⁴ Employment effects due to COVID-19 include: Loss of employment, temporary layoff, change in work hours, remote working from home or change to business model to online etc.

³⁵ Some 13% of affected 55-64 year olds and 11% of over 65s who had their employment affected had to take unpaid leave, compared to an average of 6.5% of affected 15-54 year olds.

a new 10 year strategy for adult literacy, numeracy and digital skills support. This is particularly important for older workers to enable job competitiveness, especially in a job market using more remote working options. We must avoid a skills divide in our labour market, particularly based on digital literacy. The commitment in the Programme for Government to enable a culture of lifelong learning within the workforce is welcome, however, currently Government education and skills policy as contained in the Future FET: Transforming Learning strategy does not support people to access lifelong learning supports beyond the age of 64. Most older people are also excluded from Government education and training policies such as the National Skills Strategy 2025. We urge the Department to provide for these education and skills supports post-64 in the new Statement of Strategy.

Objective 3: Develop Staff, Structures and Processes

Recommendation 6: To give due consideration to the particular needs of older people in implementing the Department's Public Sector Equality and Human Rights Duty in the new Strategy

To deliver on the Department's requirement to implement the Public Sector Equality and Human Rights Duty we encourage the Department to commit to engage in a number of rights-based processes and structures under the new Statement of Strategy:

1. Broad consultation and stakeholder consultation (as above in Recommendation 1)
2. Expand assessment and reporting on Public Sector Equality and Human Rights Duty committed to within the new Statement of Strategy
3. Recognising people's right to not be online, to maintain the appropriate level of service delivery offline³⁶

All public bodies in Ireland have a legal obligation to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans through the requirement for Public Sector Equality and Human Rights Duty.

Working to embed a human rights-based approach in the design of programmes across Government also serves to empower people to aware of, and claim, their rights over their own lives and in wider decision-making across the course of their lives.

5. Conclusion

Older persons have long been subject to inadequate protection of their human rights and overlooked in national policies and programmes. Looking forward, we have an opportunity to plan for a more inclusive, representative, and age-friendly society with the option of choice over how we age.

³⁶ In particular, being mindful of the low levels of digital literacy within an over 65 age cohort.

Older people tell us that they want to age in place - meaning the choice to remain living in their communities as long and independently as possible and with access to adequate income, housing and health supports. The vital role of adequate income and employment supports to enable people to age in place with dignity has been highlighted during COVID-19, with gaps in the system exacerbated.

It is a time to re-evaluate and reassess the adequacy of income supports in older age through commitments to assess the true cost of ageing and for Government planning on work and retirement to work together to allow people choice. A Whole of Government approach to planning for our ageing population is needed, with existing commitments embedded in Departmental planning and strategies.

About Age Action

Age Action is the leading advocacy organisation on ageing and older people in Ireland. Our mission is to achieve fundamental change in the lives of all older people by eliminating age discrimination, promoting positive ageing and securing their right to comprehensive and high-quality services.

Age Action supports and advocates for equality and human rights for all older people. Everything we do is based on a recognition of the diversity of identity and situation among older people and a concern for equality for all older people. In addressing ageing, our work includes a concern to influence perspectives on and responses to ageing. This pursuit of equality and human rights is underpinned by our work to promote ageing in place, life-long learning, and health and wellbeing for older people, empowering them to live as active citizens.