

# Consultation responses on draft PfG 2011-2015

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## Cairns S

This is my response to the consultation on the Draft Programme for Government (PfG) 2011–2015.

I am concerned that the Draft PfG lacks an overall vision and is light on key commitments for the natural environment. I believe that the Assembly needs to show the spirit and vision that is needed to make Northern Ireland a leader in sustainability and an example of what local democracy can achieve.

There is an intense focus in the PfG upon growing the economy but this should not be at the expense of the natural environment. Indeed, a healthy environment directly contributes towards a healthy economy – sustainable tourism and creation of the jobs needed to deliver a low carbon economy, are just two examples.

Whilst there are some good things in the Draft PfG, such as a revised Biodiversity Strategy and an Invasive Species Strategy, the document fails to put in place measures to help deliver them. In addition, there a number of significant gaps in the document that must be filled. I ask that the following targets are included in the PfG:

- A Northern Ireland Climate Change Act, with tangible emissions reduction targets for each sector. Currently we are 99% reliant on increasingly expensive imported energy. If we move to a low-carbon economy with a thriving renewable energy sector our energy supply will be secure, and we will have created thousands of new jobs and attracted major investment. Committing to a Climate Change Act would help us deliver this low-carbon economy.
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Finally, I want the Assembly to ‘Step Up for Nature’ by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely

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Yours sincerely D Campbell

Carrickfergus Borough Council

Programme for Government Team

Office of the First Minister and deputy First Minister

Room E3.19

Block E, Castle Buildings

Stormont Estate

Belfast BT4 3SR

16 February 2012

Dear Sir/Madam

Re: Carrickfergus Borough Council response to Programme for Government 2011-2015 consultation

In response to the draft Programme for Government from Carrickfergus Borough Council, the following points should be noted:

We believe that Carrickfergus Borough Council is a key player in contributing to the success of the PfG. Many of the actions identified cannot be achieved without the contribution of Local Government, and we are keen to work with the relevant departments to ensure a joined-up approach is taken.

We appreciate the recognition of the importance of the Belfast Metropolitan Area as a key economic driver. We hope this is translated into support for the city region across all departments.

We are broadly supportive of all the key commitments identified under Priority 1, and would comment

How will the target of moving 114,000 working age benefit clients into employment by March 2015 be achieved when the target for new jobs over the same period is 25,000?

Will DETI be seeking EU support through the JEREMIE fund for the establishment of the £50 million loan fund?

Will the support shown in relation to the Maze / Long Kesh regeneration plan and the 'One Plan' for Derry/Londonderry be extended to support the implementation of Masterplans in other towns?

Will the upgrading of the A2 from Carrickfergus to Belfast be given priority, given its importance as a key transport corridor?

We are broadly supportive of all the key commitments identified under Priority 2, and would comment

While we appreciate the aims of the Social Investment Fund, we believe that all areas suffering dereliction need attention to ensure a downward spiral of dereliction and anti-social behavior does not begin. We believe Local Councils are ideally placed to tackle these problems, given adequate resources and powers. Delivery of the Power of Well-being and Community Planning Powers are key.

We are broadly supportive of all the key commitments identified under Priority 3, and would comment

We are keen to take the lead in delivery of local community safety schemes through the PCSPs.

The role of Councils in the provision of health and well-being services such as leisure facilities and education on healthy lifestyle choices should be recognized.

We would welcome a commitment to the 'Green New Deal' being included in the PfG.

We are broadly supportive of all the key commitments identified under Priority 4, and would comment

Councils are ideally placed to offer leadership in collaborative working and again we urge the use of the Community Planning model

Carrickfergus Borough Council is happy to work with DSD on the delivery of the Carrickfergus Public Realm Scheme. We look forward to contributing to the target of 10 Public Realm schemes delivered in 2012/2013

We are broadly supportive of all the key commitments identified under Priority 5, and would comment

Local Government requires modernization, and not just rationalization. RPA must be accompanied by appropriate resources to allow Councils to attain long-term efficiencies.

Carrickfergus Borough Council is ideally placed to provide local leadership on joined-up services through a community planning model

In relation to the delivery arrangements, we believe that Local Government should be stated as a formal partner so that roles and responsibilities are clearly defined

The creation of a thriving economy is the central pillar of the PfG. In the case of Carrickfergus, 37% of our working population works within our RPA area, while 87% work within the Belfast Metropolitan Area. How will collaborative working across Council boundaries be facilitated post-RPA?

Thank you for the opportunity to comment on the Programme for Government. We hope you find these comments useful, and look forward to working with you.

## Cassells J

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  - to better the drain and waterway to stop the land and natural habitats being destroyed and more checks should be carried when this work is being done to ensure that the job is correctly done.
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Yours sincerely J Cassells



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Yours sincerely

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## Confederation of British Industry

Northern Ireland Executive's draft Programme for Government and Investment Strategy

Ref NI 03 12

The draft Programme for Government (PfG) provides a strong framework and strategic direction for the Executive. The CBI welcomes the strong commitments to the economy and the priority attached to creating jobs. There is a great deal to welcome and support within the document.

Having reviewed the PfG, and associated documents, namely the draft Economic Strategy (separate CBI response submitted) and the Investment Strategy, we have concluded that a number of improvements can be made, both to deliver more to the citizens of Northern Ireland through improved public services and job opportunities, and to help build confidence within the business community. The key improvements are summarised below:

The Executive must sharpen its focus on the most economically important commitments and ensure related milestones chart a clear route to their successful delivery. Some commitments are not stretching enough and should be augmented, again with clear milestones to inject urgency and focus

The link between priorities, commitments and milestones/outputs needs to be clearer

To achieve the employment goals the Executive must commit to a review of employment regulations which are a significant burden on job creation

The Executive should reconsider the level of subsidies it current provides with a view to using these resources to develop a specific funding initiative aimed at

addressing youth unemployment, supporting growth businesses, and increasing capital investment

The economic focus of the Programme for Government should be strengthened considerably by:

o giving greater recognition to the impact of tight liquidity and limited credit availability with the development of a coherent strategy to mitigate the funding challenges

o committing to the development of a comprehensive and more ambitious export strategy (and have this in place by July 2012)

o having more ambitious targets to raise education standards at GCSE level (essential to addressing inequalities and disadvantage, and improving employability of our young people)

The commitments to public service reform are welcome, though the positive and ambitious vision for more efficient and effective public services set out in the preamble are not reflected in specific commitments - these are disappointing in their scope, ambition and are insufficiently outcome orientated. The Executive must commit to developing a competitive public services market in which the best providers can compete with one another

□ With regards the Investment Strategy greater clarity on investment plans within the PfG period and greater clarity on alternative funding models are required. Binding, outcomes-based targets should be set for the Procurement Board.

## 2 Northern Ireland Executive draft Programme for Government and Investment Strategy – CBI Northern Ireland response

### Introduction

The CBI welcomes the opportunity to comment on the draft Programme for Government (PfG) and recognises its close interrelationship with the draft Economic Strategy, to which we have also submitted a detailed response. This response was preceded by considerable consultation with our broad membership base, and therefore represents the views of all sectors and sizes of firm across Northern Ireland.

The business community places very high importance on these drafts and understands their pivotal role as frameworks towards our economic success. CBI members believe the key goals set out in the draft PfG are deliverable provided there is a sufficient determination and focus maintained across all parts of the Executive, and key issues identified in this response are addressed.

The economic climate is undeniably tough, for the private sector to create significant new jobs not only must the right policies be in place these must be driven through urgently.

### Draft Programme for Government 2011-2015

The current draft is a significant improvement on its predecessor; its strategic focus much sharper and the commitment to the economy much more credible. Moreover, the smaller number of key commitments, in most cases (though not all) clearly linked to policy goals, makes it more deliverable. Members' feedback varied on the number of commitments; some felt a

sharper focus on less but more challenging commitments would be a better way to transform our economy over the final three years of the budgetary period while others acknowledged that the Executive by necessity must cover a very broad range of areas. Almost all however felt that regardless of the number of commitments, they needed to be more challenging. With a large number of output-based milestones, many were surprised that three years would be needed to deliver them.

There are three specific weaknesses that cut across all five priorities and impinge on the draft's overall effectiveness as a framework for economic growth and prosperity, and in particular the creation of additional jobs:

1. The link between priorities, commitments and actual milestones/outputs is not always clear. The ambitious target to reduce CO2 emissions for example is undermined in the absence of some clear, time-bound milestones and roadmap within the PfG period; and whilst pg. 50 outlines very positively what high-quality and efficient public services would look like, the subsequent commitments and milestones fall considerably short of this vision

2. There is no recognition of the need to reduce the heavy burden of employment regulation, which is stifling job creation across all sectors, as evidenced in our recent CBI/McGrigors survey which confirmed that half of all

employers in Northern Ireland are putting off hiring on this account. This is in contrast to developments in GB where the Coalition government has recognised the impact of employment red tape and committed to rolling this back. The final PfG should clearly commit to a review of employment regulations within the next 12 months and the industrial tribunal system made simpler and quicker to assist in the encouragement of job creation

3. The prospect of the Executive committing to raising revenue has again been avoided and continues to be the 'elephant in the room'. Significant subsidies and reduced charges exist (totalling over £300m pa) covering water and sewerage provision, prescriptions, concessionary travel fares, tuition fees etc. and other spending that could more fairly be met through other funding models. Many of the existing subsidies are either not targeted at those most in need, or they do not provide a stimulus to economic growth. While recognising the pressure consumers have

3 Northern Ireland Executive draft Programme for Government and Investment Strategy – CBI Northern Ireland response

been under with constrained wage growth and inflationary pressures, the additional funds raised though addressing some of these subsidies should be used to fund much-needed investment in jobs, help provide funding to growth businesses, and support further investment in infrastructure (Box 1). This will provide an important stimulus to the economy, help create confidence and improve our international competitiveness.

### Box 1 – Investing in our future

We believe the Executive should review existing subsidies with the aim of phasing in over the next 3-4 years a £100m per annum funding package, which would support the following job creation measures:

Providing finance for growth businesses (£90-£100m over next 3 years)

To increase finance provision to support growth businesses and those repositioning to export (including venture capital)

Addressing youth unemployment (£15m pa)

Increase the number of apprenticeships including to levels 4 and 5 by 500

Increase by 1000 places the number of students taking economically relevant STEM places in both further and higher education (incl post-graduate conversion courses)

Provide additional funding to support an increase of over 1000 work placements for unemployed young people

Introduce a 'graduate placement' programme specifically designed to build company capabilities to export (building on previous schemes such as the E2 programme and/or the ROI's 'Graduate 4 International Growth' programme) – 200 placements

Investing in infrastructure (£50m pa)

Provide additional funding to support capital investment in our infrastructure,

and act as a stimulus for the construction sector – expected to create over 300 construction jobs

The CBI understands that major political will is needed to deliver this, but we are strongly of the view that the tough decisions should be made today rather than tomorrow, when an even tighter spending settlement is undoubtedly on its way.

Raising this limited amount of funding should be designed in a way to protect the most vulnerable in our society and phased in over a period of years to ensure it is affordable to everyone.

With regards the overall PfG the CBI welcomes the proposed monitoring arrangements and commitment to regular reporting to ensure there is a strong focus on delivery of the key commitments.

Priority 1: Growing a sustainable economy and investing in the future

CBI Northern Ireland welcomes the strong commitments to the economy and the priority attached to creating jobs, several of which will directly improve confidence and competitiveness. In particular:

The firm commitment to press for a reduction in Corporation Tax; though the need for a clear decision from London no later than the summer should not be underestimated – this would provide a significant boost to business confidence

The importance attached to increasing our manufacturing exports and in developing other key sectors including tourism and the creative industries

The commitment to realign skills provision with the needs of business, particularly STEM sectors, while raising

overall educational outcomes - this is essential as key growth sectors have concerns that the education and skills system is failing to deliver the people they need

To strengthen the strategic direction of the Programme for Government and inject the necessary ambition and urgency for addressing the current economic challenges, it is essential that the following three measures are addressed: 4 Northern Ireland Executive draft Programme for Government and Investment Strategy – CBI Northern Ireland response

1. Greater recognition of the impact of the tightening liquidity and limited credit availability in our regional economy is required. The final PfG should recognise that a greater understanding of the scale of the financial challenges facing the economy is needed and the development of a coherent counter-strategy is necessary to mitigate the funding challenges – the current proposal for a £50m loan fund over three years is welcome, but insufficient given the extent of the withdrawal of capital and given the considerable weakness in venture capital provision which is likely to constrain the growth of knowledge based businesses (a number of local venture capital funds are under threat)

2. A firm commitment to develop a more ambitious and comprehensive export strategy (and to have this in place by July 2012) – at present there are a number of commitments and short term goals – what is really required is a more comprehensive strategy with ambitious medium and longer term goals and a range of

integrated interventions and support to help develop the growth of indigenous businesses (our response to the Economic Strategy sets our further information on this). The Scottish Executive has set out much more ambitious targets e.g. increase exports by 50% by 2017

3. We need to be more ambitious with regards to improving education standards – a goal of 70% (currently c 59%) of pupils achieving 5 GCSEs at Grades A-C (incl. English and maths) is not sufficiently ambitious considering both the needs of the economy and the resources (revenue and capital) being invested in education provision. It is concerning that this key benchmark does not feature in the Programme for Government but within the Comprehensive Action Plan within the Economic Strategy. Improving educational outcomes is critical to addressing disadvantage, inequalities and improving employability

Priority 2: Creating opportunities, tackling disadvantage and improving health and well-being

Many of the commitments within this priority are rightly recognised as being key drivers in the Executive's bid to tackle the persistent levels of economic disadvantage within our society. Many of the individual commitments are positive and will go some way in helping with this objective – we warmly welcome the commitment to improve literacy and numeracy levels amongst all school leavers and would like to participate in the development of related policies.

The cohesion between the commitments in this section and others throughout the draft is not clear in all cases however, and in its current form runs the risk of becoming a series of

individual commitments without an overall strategy.

Buried within the fifth commitment for example is a promise to “tackle systemic issues linked to deprivation,” delivered through the Social Investment Fund and hoping to achieve “positive trends on lead measures relating to levels of education, health and employment in areas experiencing high levels of deprivation” by 2014/15. With just a £40m pot of money, we do not believe these objectives will be met. Complex social and economic problems will only be remedied with a truly cross-departmental approach that maximises the resource at the disposal of both Stormont and Whitehall. We welcome the creation of an advisory group to explore the human impact of the Coalition's welfare reform plans, though would like to see a focus on the more positive opportunities that can accrue if managed effectively, such as higher employment levels and lower rates of economic exclusion.

Priority 3: Protecting our people, the environment and creating safer communities

There are significant strategic commitments set out in this section, though in too many cases specific outcome measures and timescales are not provided. In some cases recent reviews or strategies are being 5 Northern Ireland Executive draft Programme for Government and Investment Strategy – CBI Northern Ireland response

developed. However more effort to establish key outcomes would be beneficial.

In contrast there is an ambitious goal to reduce greenhouse gas emissions by 35% by 2025, though in this case there is little if any indication or roadmap of what actions and progress are to be

achieved within the PfG period. The existing NI Action plan for GHG emissions reductions has identified a potential goal of 33% reduction by 2025 – though this depends on halving emissions from both power generation and from domestic emissions. Without firm short term actions/commitments (which are not clear in the Action Plan) together with planning and regulatory delays (which could impact on necessary infrastructure development) we have little confidence that the target will be achieved.

Furthermore despite strong cross-political support for the Green New Deal (GND), and a £12m budget commitment (which will leverage an investment of over £72m on improving energy efficiency in homes) there is no reference to the GND within the PfG document! Yet it is exactly this type of leverage that the Executive should be looking for, especially with a scheme designed to reduce energy usage, prevent fuel poverty, and create up to 1100 jobs as well reducing CO2 emissions.

CBI Northern Ireland supports the challenging targets for industry of “to achieve 20% of electricity consumption from renewable electricity and 4% renewable heat by 2015”, however we would expect to see equivalent targets for the public sector estate.

CBI Northern Ireland is disappointed to see a commitment to introducing a single use carrier bag levy without any clear reference to allowing retailers to recoup reasonable costs, as we proposed in our official response to DOE’s consultation and which has been done to good effect in Wales.

We welcome the commitments on reducing crime and antisocial behaviour but are keen to see recognition from the Executive that there is a strong role for the private and third sectors in helping deliver this objective. As a bare minimum, we want

to see a clear political commitment from the Executive on this, not just for justice but for all public service sectors, to ensure our society benefits from the best outcomes whilst still providing value for money to the taxpayer.

We strongly support the need to promote more sustainable modes of transport. However the outputs are financial rather than outcome focused. Indeed we need to achieve a modal shift to more sustainable modes of transport and this is not reflected in the draft PfG. The commitment to invest over £500m over the PfG period to promote more sustainable modes of travel over the PfG period is somewhat misleading as a minority of this is capital expenditure, with most of the funds used as revenue support and £125m is cover concessionary fares (the latter being particularly badly targeted failing to support the most vulnerable or those seeking employment). Our concern is that public transport services will actually be under threat in 2013/14 due to budget cuts. In the absence of public funds to modernise and improve our transport system the Executive must seek opportunities for encouraging private sector funding.

Priority 4: Building a strong and shared community

The business community warmly welcomes many of the key commitments under this priority, which show ambition and vision for Northern Ireland. Flagship events, such as the World Police and Fire Games and the Irish Open, not only raise our profile and help change perceptions on the international stage but also support jobs, contracts and growth for local firms. The business community is keen to support the Executive and its agencies with the successful delivery of these and other events in all ways possible.

Vision is being demonstrated again through the commitment that all children will have the opportunity to participate in shared education programmes by 2015. It is essential that all aspects of this vision fall into place however, particularly those relating to the schools 6 Northern Ireland Executive draft Programme for Government and Investment Strategy – CBI Northern Ireland response

estate, which will need to be considerably redesigned in order for it to be fit for a shared future. Again, the business community is very keen to be involved in this process and would very much welcome either representation on or close engagement with the Ministerial advisory group.

Reforming the Prisons Service is an important factor in the objective of a shared community and we therefore welcome the commitment made to this end. However as a major area of spend in Northern Ireland, a considerable employer and indeed one of the fulcrums around which a broader public service reform agenda must rotate, we would like to see the Executive go further with their plans for reforming the Prisons Service. On the staffing front, we feel that more needs to be done on issues such as pay restraint and the re-engineering of roles, processes and shift patterns. At the more strategic level, we are keen to see a reform programme that emulates the success of 'end-to-end offender management' that has been initiated under the NOMS programme at the Ministry of Justice, including a clear role for private and third sector providers commissioned and performance-managed using outcomes-based contracts.

Priority 5: Delivering high-quality and efficient public services

The First and deputy First Ministers promise in their opening comments to

deliver "results that everyone can see in their daily lives" but the draft in its current form will fall considerably short of this. Our influential 'Time for Action' report identified a wide range of ways in which public services could be radically reformed, saving up to £1.1bn per annum by 2014/15. Action has been taken in some areas though the pace of change continues to be slow and the level of ambition too low.

Without a clear overarching strategy on public service reform from the top of the Executive, reform will be incidental rather than fundamental (and driven by budget constraints rather than vision), and the implications manifold – citizens will be denied the best quality services they expect, with pressure worsening after the next spending settlement. Looking further ahead, the likely reduction in the block grant over the medium to longer term combined with demographic pressures on services such as health and education will make for a very challenging environment.

Omitted from the current draft is a clear articulation of the outcomes the Executive wants to achieve in each area; the current set of commitments is merely a collection of outputs. Rather than aiming to set up new structures or put in train new guidance, this PfG needs to be challenging Ministers to achieve better educational outcomes; reduced re-offending; higher satisfaction rates amongst social housing tenants; safer neighbourhoods; and then entrusting departments to work together to draw up the best way of getting there. The corresponding milestones should be benchmarks to measure performance against these outcomes e.g. an annual 5% reduction in re-offending rates or the closure of 60% of demographically unviable and underachieving schools by 2015.

The private and third sectors have a key role in this drive to make our public services more efficient, effective and fit for the future. We are disappointed



therefore that, despite recognition in many party manifestos, there is no clear mention of their role in this draft. We would like to see the Executive include a commitment to developing a competitive public services market in which the best providers can compete with one another, with related milestones including the development of a cross-departmental competitive framework or an 'any willing provider' policy in all appropriate sectors, and a commissioning skills programme rolled out from a central unit by 2013. The CBI-Deloitte Commissioners Network is developing papers on these issues and is working closely with senior civil servants and is happy to be consulted on these suggestions.

On the issue of government structures, a more mature and effective approach is set out in the draft with a welcome commitment to agree post-2015 changes by the end of 2012. 7 Northern Ireland Executive draft Programme for Government and Investment Strategy – CBI Northern Ireland response

#### Draft Investment Strategy for Northern Ireland 2011-2021

We welcome the opportunity to comment on the Executive's draft Investment Strategy 2011-21, the response for which we have chosen to combine with that of the PfG due to the strong view amongst our members that each are dependent on one another for their success. Strategically, the draft is well-positioned. It lays out a clear and compelling vision for Northern Ireland's infrastructure offering, and the crucial role that needs to be played by infrastructure in driving up competitiveness and attracting mobile global investment is recognised, as is the 'multiplier effect' of infrastructure spend on the wider economy.

The rhetoric on funding is good and the commitment to exploring all options, particularly in alternative finance models, welcome. There are also strong words on the need for 'joined-up procurement', reducing waste, co-locations, better estate management, and the need to urgently tackle underutilised assets – some firmer timescales and commitments would be welcome and help create confidence that these changes will be driven through.

There are two persistent areas of confusion however which together are causing considerable damage to private sector confidence and which are ultimately delaying the delivery of these crucial infrastructure plans:

1. At the political level, there remains major confusion as to what respective Ministers are planning in terms of their capital investment, with some seemingly prevaricating due to fears of negative public opinion. The CBI is adamant that our competitiveness will suffer unless clear action is progressed to deliver projects in 2012 and would therefore urge the Executive to move boldly to resolve this confusion within the next few weeks. A clear, simple statement of intent from the Budget Review Group setting out all the key capital projects to be commenced in

2012/13 would go a long way in achieving this.

2. At the technical level, question marks remain as to the models that can be used in various circumstances and the wide range of interpretations from Ministers, officials and other actors such as auditors, professional advisers and even the PAC, make projects' progress dependent on firm answers to this question being arrived at in the very near future. This is particularly urgent in the case of projects' accounting treatment question, which

has a material effect on individual project business cases and which at the strategic level, could threaten the viability of the budgetary assumptions on which ISNI3 and PfG are predicated.

Our members recognise the value in the world-class project portal developed by SIB and welcome the emphasis placed on it for delivery tracking. It is imperative however that it does indeed get used in the way envisaged, and that data is uploaded within reasonable timescales that can give anyone with an interest a genuinely informative view of the infrastructure piece across our economy at any one time. The feeling currently is that the NI-wide data picture is incomplete, and our members note their inability to make quoted total project figures add up to the tenders they know are in the marketplace. We value our positive relationship with SIB

Our final comments relate to the complex and inefficient shape and process of public sector decision-making on infrastructure. The common thread to much of our members' feedback on ISNI 3 and indeed more generally on the Executive's performance on infrastructure is that there are too many players, too little communication and far too much scope for duplication, delay and political inertia. All of these things contribute in a negative way to value for money, to supplier confidence and growth, and in the end to the quality of our infrastructure offering. CBI Northern Ireland appreciates the PfG commitment to reviewing government structures and we would welcome specific conversations on how our common goal of delivering world-class infrastructure can be accommodated within this agenda.

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and would be keen to continue to build on this with a two-way conversation on a regular basis that ensures this portal is realised as the asset it can be for improving our infrastructure, while providing much needed visibility and confidence to the construction sector.

Commitment to further improving procurement processes and learning lessons from recent legal challenges are welcome, though we are disappointed that the Procurement Board has not been held to any binding, metric-based commitments. Without a sense of urgency on this area, ISNI 3 risks losing sight of another one of its targets; that of supporting jobs and growth in our construction and related sectors. 8 Northern Ireland Executive draft Programme for Government and Investment Strategy – CBI Northern Ireland response

## Centre for Effective Services

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Programme for Government Team Office of the First and deputy First Minister  
Room E3.19 Block E, Castle Buildings Stormont Estate Belfast

BT4 3SR 22 February 2011 Dear Sir/Madam, Response to the Consultation on the draft Programme for Government 2011 – 2015 The Centre for Effective Services (CES) is an independent not for profit centre for the promotion and support of evidence-informed policy and practice in relation to children, families and communities. It is an all island organisation with offices in Belfast and Dublin. CES welcomes the opportunity to comment on the draft Programme for Government 2011 – 2015. We have provided high level comments which focus on the construction of this and future programmes for government, their implementation and how progress can be measured and reviewed.

1. We welcome the publication of a draft Programme for Government and the change in approach from the previous Programme, particularly the reduction in the number of commitments/targets and the attempt to bring a coherent vision to the business of government. Northern Ireland's form of coalition government presents a unique set of challenges for the Executive in getting things done. All the parties of the Executive are to be commended for delivering a draft Programme which achieved consensus.

2. CES welcomes what appears to be a shift towards an outcome focus in the Programme for Government. While the intent of the Programme is to be high level there are numerous examples of where it goes into a surprising level of detail. This does seem to suggest a continuing focus on outputs in the development of the Programme rather than a rigorous concentration on outcomes.

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3. In relation to a focus on outcomes the development of the Programme for Government echoes the approach now being taken by the Scottish Government, particularly the 'Scotland Performs' framework. We would encourage the NI Executive to deepen its engagement with the Scottish Executive in this regard as the approach being taken there appears to offer a very promising focus on outcomes for public services.

<http://scotland.gov.uk/About/scotPerforms/outcomes>

4. The delivery of the Programme and the development of future Programmes for Government would be greatly assisted by the use of logic modelling.<sup>i</sup> The use of logic modeling at the level of a Programme for Government could help to break down

the barriers between departmental strategies and provide connectivity between macro and micro levels when logic modelling is also deployed in relation to the detailed actions that will flow from a Programme for Government. CES has developed expertise in relation to the use of logic models in strategic, service and community development settings and would be pleased to discuss any way that the Centre could assist in the use of logic models in relation to the Programme for Government.

5. CES was concerned that there was not an explicit commitment to early intervention and prevention in the Programme for Government. We previously endorsed the proposal by the Children and Young People's Strategic Partnership that Northern Ireland should be designated as a site for early intervention. For this type of approach to bear fruit it must have explicit, consistent and informed cross party political support.

Early intervention and prevention approaches have continuing appeal to governments across the world because of the promised savings in later years which in theory could be reinvested into more early intervention and prevention, thus creating a virtuous funding cycle.<sup>ii</sup> In practice it can prove very difficult to identify the savings and even where they are identified to ensure that they are protected and diverted to other budgets. For this to work there must be a political consensus around this approach allied to a cultural shift in departments and agencies in relation to diverting savings in this way. Current experience in Scotland may have something to offer in terms of using outcomes as a driver to break up the silo mentality of departments and agencies. The Social Investment Fund could be used to kick-start this type of virtuous funding cycle provided there is both the will and the public accounting mechanisms to divert savings realised in future years. Page 3 of 5

A number of major prevention and early intervention projects in relation to children and families are being piloted in Northern Ireland. This work is based on international evidence of what works. Results will be published from 2012. Related to this a Dissemination Initiative on Prevention and Early Intervention in Northern Ireland. The aim of the Initiative is to identify and communicate the key learning and overarching messages from the prevention and early intervention programmes (funded by The Atlantic Philanthropies and Government) which are relevant to audiences in government and elsewhere. The initiative involves a series of meetings attended by policy makers, practitioners (Atlantic Philanthropies funded grantees), Atlantic Philanthropies and CES, and delivering on an emerging programme of work. The outputs from the Initiative will be of interest in the context of the Programme for Government.

6. It was notable that the Economic Strategy has offered an economic vision for 2030. We would suggest that in relation to the Programme for Government the NI Executive should be attempting to establish a similar vision. Once again the

approach taken by the Scottish Executive in this regard is both pertinent and striking. For the change envisioned within this Programme for Government to be fully realised there must be a degree of cross party political consensus that will allow for the pursuit of outcomes that will span more than one Assembly term. Some of the impact from early intervention and prevention, particularly that which is focused pre-birth and in the early years will be generational in terms of measuring impact. This relates to the challenge faced in all democracies of how to mitigate the effect of narrow, short term goals connected to electoral cycles on long term change processes (10 year plus) which can deliver the major social impact and savings to which the public and politicians ultimately aspire.

Connected to this there is also a case for reviewing the effectiveness of allocating budgets on an annual basis and instead make budget allocations linked to the length of a strategic plan, say three to four years. This would avoid some of the distortions of annual spending cycles and would enable departments and statutory agencies to enter into more stable service level agreements with voluntary organisations or into pooled budget arrangements, confident in both cases that they would be able to honour their commitments in future years.

7. The commitment to complete the reorganisation of local government is welcome. A coherent and empowered local government tier is an essential prerequisite to the delivery of multi-agency programmes particularly in our most disadvantaged communities. While we understand the considerable difficulties in achieving shared boundaries across public services, and acknowledge the progress that has been made through a series of major reorganisations in the public sector, it is disappointing that the vision of co-terminosity envisaged in the Review of Public Administration has not been realised. The lack of co-terminous boundaries between agencies will continue to be a barrier to effective implementation of many aspects of the Programme for Government.

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8. There is growing international recognition of the importance of a focus on implementation in the development and delivery of government policy and strategy as well as the effective delivery of specific programmes and interventions.

The work of Blasé and Fixsen (*Implementation Research: A synthesis of the literature* University of South Florida, 2005 with others) would suggest that resources will be optimised if there is a greater emphasis on the implementation of existing programmes and practices over new spend or redirected spend on pilots. This is echoed in the independent report by Susan Deacon (*Joining the Dots: a better start for Scotland's Children*, 2011) to the Scottish Government which in turn re-emphasises the importance of making best use of what is already known – “*Scotland is a small country. We have strong networks and close working relationships. We*

*have a wealth of knowledge and experience, a track record of innovation, a rich culture and our greatest asset – our people. We know how important children’s early years are and have a pretty good idea of what needs done to give children a better start in life. We have masses of research and evidence and heaps of good practice. We don’t need to invent or discover any of this, we need to work together to connect it up – in short, ‘to join the dots’.*” Following the Global Implementation Conference in Washington in August 2011 an Implementation Initiative has formed in Ireland on an all island basis bringing together policy makers, researchers, service providers and practitioners to form a critical mass of thinking and learning on implementation in the Irish context, North and South. The aim is to create a learning community in order to improve outcomes through better implementation of policy, strategy, programmes and interventions. We hope that these comments are helpful and we would be pleased to have further discussions on specific issues if this would be helpful. CES has experience and a strong interest in the use of evidence to inform policy development and implementation and would be pleased to discuss any assistance we might provide in relation to the Programme for Government.

If you have any queries or questions regarding this response then, in the first instance, please contact Avery Bowser at the Belfast office  
abowser@effectiveservices.org

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i Logic modelling provides a way of systematically working through the components and connections between the various elements of a process, linking resources (inputs), activities (outputs) and outcomes. Logic models provide a graphical representation of a theory of change and are often applied to discrete services or programmes. They can also be used to provide a visual representation of a process on many different levels (e.g. nested logic models) and can be a particularly useful tool for clarifying the actions that are required and the responsibilities within multi-agency or multidisciplinary initiatives. This can be helpful in a mixed group for improving planning and communication, ensuring shared perspectives and buy-in. ii *Preventative Spending* Northern Ireland Research and Library Service, Research Paper NIAR 19-11, Jan 2011. *Early Intervention: The Next Steps* Graham Allen MP; HM Government, Jan 2011 *Early Intervention: Smart Investment, Massive Savings* Graham Allen MP; HM Government July 2011 *Joining the Dots: a better start for Scotland’s children* Prof Susan Deacon, Independent Report March 2011.

## Chartered Accountants Ireland



Chartered  
Accountants Ireland  
Ulster Society

Response to the Draft Programme for  
Government (PfG) and the Draft Economic  
Strategy

February, 2012

### Introduction

Chartered Accountants Ireland Ulster Society welcomes the opportunity to set down its views on both the Draft Programme for Government (PfG) and the Draft Economic Strategy published in November, 2011. Both documents are comprehensive and earnest if short on ambitious thinking and proposals to address the structural weaknesses and shortcomings that confront the local economy. Seventy-six commitments in the Draft PfG, coupled with the priorities in the Draft Economic Strategy, make up the administration's response to what must be regarded as the most serious economic challenge to confront the Northern Ireland economy in living memory.

### Chartered Accountants Ireland Ulster Society (The Society)

The Society is made up of 3,500 members drawn from business, practice and the Public and Third Sectors. Many members help to lead companies of significant size, accounting for tens of thousands of jobs in both the manufacturing and service sectors. Members in practice advise clients who are grappling with economic conditions that are a test of acumen, stoicism and doggedness. The membership is, therefore, uniquely positioned to interpret the pulse of the 'patient', and to say if what is contained in both documents is sufficient to aid recovery and to provide the impetus to re-balance and re-build the economy.

### Commitments and Strategy

The Commitments and targets set out in both documents are wide-ranging and potentially far-reaching.

We particularly welcome:

£300 million of investment by businesses in Research and Development, with at least 20% coming from Small and Medium sized Enterprises;

increasing our manufacturing exports by 15%;

supporting 200 projects through the Creative Industries Innovation Fund;

increasing visitor numbers to 3.6 million by 2013;

increasing tourist revenue to £625 million by 2013;



introducing an extension of the Small Business Rate Relief Scheme to 2015;

The elimination of Air Passenger Duty (APD) on all direct long haul flights. This can help make Northern Ireland an attractive destination for tourism and investment alike;

Supporting the promotion of over 25,000 new jobs;

Achieving £300 million investment through Foreign Direct Investment (fdi)

Pressing for the devolution of Corporation Tax and reducing its level.

It would be churlish not to acknowledge the achievements of the First PfG and which now represent the basis for going forward. However, individual elements of the current document do not provide the stimulus that the economy requires to put in into a higher gear. Caution appears to be the sub text in both papers and this Society would argue strenuously that a more adventurous and aggressive tone is required, especially in respect of the key sectors identified by Matrix.

End risk aversion

Over a period of shrinking Government, reduced spending and a Private Sector that is generally ill prepared for what lies ahead, a bureaucratic, steady-as-she-goes approach will fail to deliver the desired outcomes. We need to set aside the risk-averse mantra that informs every Public Sector action and decision. Instead the administration must show real innovation in its decision-making which rewards the can-do entrepreneurs, establishes compelling reasons to expand and grow and provides timely and structured assistance to help devise and develop new products that are capable of being world-beaters. While PfG targets are good, they will not count for much if Ministers fail to address the risk averse culture that permeates the Public Sector. Such a culture does not sit well with an entrepreneurial society; when problems arise, it is important that individuals and organisations have the confidence to address the challenges in a prompt and efficient manner without fear of falling foul of an over-cautious system.

Corporation Tax

The debate on the devolution of tax varying powers to allow the Northern Ireland Executive and Assembly to reduce the Corporation Tax rate is taking an inordinate amount of time.

Described as a “game-changer”, this Society views with mounting concern the timeframe to introduce a measure that could radically alter our economic fortunes, and the absence of thinking around the supporting strategies needed to ensure success. In depressed global conditions, with intense competition for scarce Foreign Direct Investment (FDI), and when every advantage must be exploited, the Society would appeal for swifter, more decisive action by both national government and the local administration.



Delay on this issue will send out negative signals; we may say that “a vibrant economy” is our number one priority, but it will sound hollow if we do not act with the urgency that is required. Indeed, it could be argued that the case for reduced levels of Corporation Tax is now more pressing than when first mooted given the undoubted need for measures that will bolster the overall effort to carve out a greater role for the Private Sector and deliver tangible results during the lifetime of this PfG.

#### Access to Finance

Availability of Finance to fund investment in Northern Ireland is a major obstacle. The financing model in NI has changed dramatically.

Banks are lending less; at higher costs; and in lower proportions

Grants have substantially reduced for capital expansions and are set to fall further

Business profits for re-investment have declined

Venture Capital and private equity streams are negligible, compared to other UK regions

This means that businesses are finding it significantly more difficult to access finance.

Invest NI established its Fund of Funds to meet the funding needs of the NI business community.

We welcome the recent announcement of the £50m loan fund, and would urge that work start immediately on a further fund, to allow for the time taken to consider within government.

There have been bottlenecks already – the Development Fund should have been up and running last year, but has stalled due to difficulties in securing the matching £20m. In our view it is not likely that the Development Fund will be open for business in 2012, and therefore we would propose that the approach be reconsidered. The Invest NI NISPO Fund, launched in 2008, will this year approach full investment, and we would urge urgent consideration of “NISPO II”.

It is our view that there continues to be market failure in terms of the finance available for growing NI businesses.

It must be a priority of Invest NI to address these issues; otherwise the economy will continue to stagnate. There will be pressure on jobs and there is a possibility that NI-based entrepreneurs will be forced to build their businesses outside NI.

#### The Rescue Fund

Given the continued difficulties which continue to be faced by many local businesses, the limited liquidity in the marketplace and the lack of public monies being made available to ailing business, the Executive should give serious consideration the establishment of a Rescue Fund. A portion of the DETI budget should be ring-fenced for recovery and restructuring purposes. Whilst there is an acknowledgement that an element of these funds may be invested at “high risk”, one should consider and compare such an investment with an investment in early-stage Research and Development which also carries a certain level of risk.

#### Invest NI -Need to Know

There is general confusion and not a little doubt over the level of support and assistance that Invest NI is prepared to offer. Invest NI should publish clearer guidance to end this confusion; if schemes are discontinued, re-shaped or modified, Invest NI has to duty to share the information and not drip feed it on a ‘need-to-know’ basis. The Society would also like to see greater flexibility from Invest NI for the way it goes about assisting new, emerging and growing businesses. Avenues closed off following IREP also need to be re-examined, ie capital grants, equity investments, particularly given the market failure which continues to be in existence in terms of access to finance.

#### Sharper Focus and Ambition

The Society is of the view that a sharper focus and greater ambition is required in a number of specific growth sectors, particularly ICT, agri-food and environmental. There is universal agreement on the potential held out by these sectors for business expansions, business start-ups, product development, innovation and job creation from both indigenous businesses and inward investors. What is required in the short to medium term is a set of ambitious objectives and delivery timetable - a co-ordinated and focused approach to successfully exploit the strengths that exist.

The Society would like to see the following:

#### ICT

The first meeting of the ICT Skills Taskforce was held by on the 16<sup>th</sup> February, 2012. Its establishment was both timely and necessary. The Taskforce will agree a coordinated approach to assess the ICT sector’s current skills needs; to understand issues relating to the quality of education and training provision; and agree that all parties would work together in addressing the skills and quality issues for the short, medium and long term.

Under the Chairmanship of the DEL Minister, Dr Stephen Farry, MLA, the group will examine impediments to growth such as why employers are finding it increasingly difficult to recruit suitable staff; spin-outs from our universities and Global trends and opportunities.

We welcome the establishment of this Taskforce, and would urge that its considerations are undertaken swiftly, and that an ambitious action plan be developed and implemented quickly. We would draw reference to the recently

launched ICT Skills Action Plan in ROI, where even in an economy which is much larger in ICT terms than NI, skills availability is a critical factor.

Much greater numbers of skilled employees in this sector are required, to satisfy demands today and also the greater demand created through lower Corporation Tax,

The ICT Skills Plan in ROI calls for a doubling of undergraduate numbers, and we would suggest that a trebling of the places in NI would be the order of magnitude required to harness the opportunity in this sector.

### Agri-foods

*“.....the agri-food industry remains one of the success stories of the recession and continues to make a major contribution to our economy, not only by its resilience but also by its increasing productivity”.* Agriculture and Rural Development Minister, Michelle O’Neill MLA, May 2011

“It is the largest manufacturing sector, one of the largest exporters and has performed well during the current challenging economic climate”. Enterprise, Trade and Investment Minister, Arlene Foster MLA, October, 2011

Both these statements say everything about the importance of the agri-foods sector to the Northern Ireland economy. It generates sales of £3.7 Billion and accounts for 20,000 jobs. It is robust and innovative, and with the creation by the two Departments of a new Food Strategy Board (FSB), the expectation has to be that the sector will deliver increased results. One of the first tasks of the Board, which was announced last October, will be the development of a shared plan for export-driven growth (currently £2.2 billion in external sales).

The Board must work at speed to develop its plan. Pivotal to its success will be input from the private sector which knows what has to be done. Ambitious growth targets are required alongside a range of financial measures designed to assist product Research and Development, innovation and exports. This is an exciting sector with tremendous potential and every effort must be made – from farm to factory – to ensure it delivers on its promise.

### Environmental

We welcome that fact that DETI has continued to support the Renewables sector through the Renewable Obligation Certificate (ROC) scheme.

The strength of the environmental sector in NI is seen in the successes of long established companies such as Harland and Wolff, McLaughlin and Harvey and the success in attracting global companies, such as DONG, to Belfast Harbour. More must be done to support the environmental and renewables sector, including through speedier planning and an environmental park for Northern Ireland, as proposed for the North Foreshore site. Only then can NI exploit its worldwide perception of a green economy.

## Our Research Strengths at NI Universities

We continue to recognise the strength of the research base at QUB and University of Ulster. We would urge that critical programmes that aim to support NI as a knowledge based economy, such as the Proof of Concept programme, are maintained, whilst putting in place interventions to ensure commercialisation of this valuable research.

### Hidden Gems

Parts of the extended Public Sector are producing impressive but little-known research results. Work that is conducted by scientists is cutting-edge with significant Global applications. These are wealth generators and more should be done to assist them commercialise their work to the obvious benefit of the economy.

Two such examples are:

AFBI, which has an impressive portfolio of projects, reflecting the over 600 scientists who operate from the organisation.

HSC Innovations, which has a challenging task of identifying, coordinating, and supporting opportunities from commercialization arising from NI's health sector.

In a period of tight financial constraint, the onus must be on fully exploiting every available asset. We are ignoring the impact these and other research facilities can make, a situation that has to change.

### DETI and DEL

The Society applauds the decision to begin the task of Government Department rationalisation. Closing the Department of Education and Learning (DEL) and shifting the bulk of its duties to DETI is sensible and timely. A new Department of the Economy will create clearer reporting lines; mesh more readily with other DETI functions; fit more strategically with core responsibilities; produce some as yet unquantifiable savings and eliminate a "them and us" mentality. Before the larger organisation comes into being, there must be full engagement with the Private Sector to assess how best it can structure itself to meet economic challenges which are expected to grow in intensity. In addition, a clear-sighted and uncluttered Departmental Strategy is required that gives focus and direction to the task.

### Education

There is a need to create an appetite for business. A more streamlined Department approach, as set out above, will greatly aid the economy, but there has got to be a cross-over to the Department of Education. Whilst acknowledging the value of STEM, more is required to inculcate in our young people a hunger and desire for business. At a young age, we must encourage and promote the whole concept of business; highlight the values and benefits and invention, innovation and creativity and build a resourceful and capable generation unfazed by business start-up. They must learn, and we must help them in practical ways, to view themselves as the

entrepreneurs of tomorrow. In essence, the educators must play a decidedly greater role alongside those who steer the economy to shape the business community of tomorrow.

This support could take the form of:

Educational classes, seminars and diploma qualifications for those interested in setting up a business, potentially divided into three categories: 14-18 year olds currently in secondary education (summer school format), secondary level for current jobseekers and advanced level for those currently in higher education (again, in a summer school format).

This intervention would seek to educate students in important areas and challenges of business which are encountered particularly within the first three years (financing, legal matters including protection of patents, regulatory requirements etc) as well as inspiring further creativity with lectures, projects and competitions.

Focus should also be on practical support to (aspiring) entrepreneurs with on-site advisors in areas of interest. A link with the NI Science Park and other Enterprise Hubs should be encouraged.

## Skills

The skills deficiency is also dealt with under ICT. The Society contends that the skills provision generally has to be more closely aligned with growth sectors and areas where Northern Ireland hopes to do well in Foreign Direct Investment (FDI). A 5-year plus approach is required so that when companies considering investing here will be encouraged by the availability of an appropriately skilled workforce. There seems little point bringing in FDI if the employment that stems from them does not directly benefit the community or acts as a disadvantage to existing businesses, FDI or indigenous.

## The Reskilling Debate

We need to be more focussed on who shall be re-skilled and where those individuals can be employed. Certain sectors in the local economy have fared much worse than others in terms of job losses and instability. The construction sector has historically employed high numbers in various roles, many of whom have gained expert project management and technical skills. An element of the DEL budget should specifically be used to retrain these individuals in new areas of work such as IT or Financial Management where there is a guarantee of employment at the other side.

## A multi-lingual labour force

Much credence has been provided to the importance of STEM subjects with little importance being placed on the development of language skills of our labour force as a tool to increase productivity. Improving the language skills of our population would not only increase the attractiveness of Northern Ireland as a destination for FDI, but these multi-lingual individuals would prove invaluable to indigenous entities wishing to export products and services abroad. Whilst it is accepted that the vast

majority of 'FDI' enjoyed by the Republic of Ireland originates in the USA, the recent expansion of 'BRIC' and 'MIST' economies – where English is not the first language - provide excellent opportunities for growth as entities in these countries seek to expand into UK and European markets.

The development of foreign language skills should not cease at secondary school level as we should encourage students in higher education to 'bolt-on' language modules to their courses and degrees, whilst also offering existing members of the labour force or jobseekers the chance to improve language skills part-time.

### Family Owned Business and “Scaling”

The Society welcomes the Invest NI new initiative around “scaling” businesses for growth, particularly given that so many of our businesses are Family Owned Business who can benefit from external support. Initiatives such as these should be rolled out on a larger scale than appears to be the case, with priority funding and resourcing given, in order to achieve maximum impact.

### Benchmark Republic of Ireland

The Republic of Ireland has embarked on an export-led recovery. Many facets of business activity are achieving notable successes. Across a range of fronts, including FDI, access to finance, SME Loan Fund and Tourism, the Republic of Ireland has demonstrated lateral thinking, responsiveness and innovation. The Society recommends that the Northern Ireland Executive Economic Sub-Committee examines in detail the approach being taken by the Republic of Ireland and takes the best of what is being done and applies it to the local economy.

### Government Reform

Northern Ireland is over-administered and over-governed. At times of austerity, the onus is to first examine what can be done at home before widening the net. In this respect, the Society welcomes the commitment to cut the size of government to more realistic levels. It supports the view that departments could be reduced from the current level of twelve to eight; the elimination of many NDPBs and quangos and the reduction in the size of Local Government from 26 to 11 District Councils. It also supports reforming the Health and Education sectors. Taken together, the savings that result from a slimmed down administration will not be sufficient to make a dramatic impact on anticipated funding shortfalls during the period of this PfG, but they will tangibly demonstrate to the wider community that the NI Executive is serious about tackling Public Sector duplication, waste and re-organisation.

### Investment in Infrastructure

The Society welcomes the announcement of £580 million in major road schemes and hospitals which will go a long way towards preventing further decline in the construction sector. It is good that the schemes outlined such as the A8, A2 and A5 are given priority. However, within the context of aiding wider economic activity, the Society is disappointed that the dualling of such vital links as the A57 from the M2 to Belfast International Airport – some seven/eight miles in all - did not feature in the



announcement. According to Oxford Economics Forecasting, Northern Ireland exporters air freight £1 Billion worth of goods each year, the bulk of which passes through Northern Ireland's main airport which operates 24 hours per day without physical or environmental constraints. Upgrading the A57 from its current, antiquated state would greatly facilitate hauliers and enhance the airport's air freight reputation.

From the perspective of potential Foreign Direct Investors (FDI), and new international airlines considering the airport as a base for new services, the impression that the A57 conveys is of a region that is backward, parochial and lacking ambition. In addition, with so much emphasis on tourism, and the potential it offers, a road serving the region's principle airport that is from a by-gone era does little to enhance international standing as a must-visit tourist destination.

The Society would, therefore, urge the administration to fast-track preparatory work to address what it considers a glaring deficiency in infrastructure with a view to the early commencement of construction on a new dual-carriageway to this pivotal economic asset.

## Tourism

Goals:            increasing visitor numbers to 3.6 million by 2013

                      increasing tourist revenue to £625 million by 2013

Tourism is poised for a bumper year with the centenary of Titanic's Maiden Voyage, the decision to hold the Irish Open at Royal Portrush and the opening of the new Visitor Centre at the Giant's Causeway. This will be followed in 2013 when Derry-Londonderry celebrates its UK City of Culture status. Visitor numbers and revenues are expected to break records.

That said, the absence of direct air access to Northern Ireland from potentially lucrative markets such as Canada, Germany and Scandinavia will mean a failure to fully exploit the opportunities that exist. Northern Ireland enjoys only one trans-Atlantic service and the Society is of the view that re-doubling of efforts to attract new international carriers would pay handsome dividends. To that end, it supports the initiative by DETI/Tourism Ireland to forge ahead with an Access initiative to see:

The restoration of a direct Belfast-Toronto service

The addition of services to other US centres such as Boston and Chicago

New European routes to the likes of Frankfurt, Madrid, Copenhagen

Increased connectivity to hubs other than Heathrow to facilitate access to Australia and rapidly developing markets of the East.

The Society is of the view that securing the Irish Open at Royal Portrush will be a significant boost. It should now be replaced in the goals set out by Government a determination to secure the British Open in the lifetime of this current PfG.

The job creation potential in this sector is immense and should not be overlooked. We must look to the things that we can accomplish ourselves, and this sector is one that could deliver impressive business and employment results. There is a correlation between passenger throughput and jobs that is a widely accepted aviation standard; for every one million passengers, the number of jobs created is 1,000. On its own, this stark statistic makes tourism and aviation the economic game-changer that should receive much greater attention.

Tourism encompasses many different facets from the day-tripper to the visitor who spends the bulk of his/her time in the region. A third element is the Conference visitor and here, too, renewed efforts are required to market what is there, or soon to be in place, and to stimulate further investment in hotel and international conference facilities. Training in the hospitality industry must also become a higher priority.

#### Air Passenger Duty (APD)

There is some urgency required when it comes to the devolution of Air Passenger duty (APD) tax varying powers.

The issue with excessive duties came close to ending the one and only direct trans-Atlantic service and it was only through a united front at the Northern Ireland Executive, and a willing ear at HMT, that the region won a major concession to reduce the tax on long-haul to short-haul levels. There was also a commitment to devolve the power to Stormont. The society would like to see the necessary amending legislation introduced as a matter of urgency.

This runs right to the heart of Northern Ireland being able to attract new international airline operators and compete on a level playing field with Dublin where the tax is set at 3 euro compared with £12. Northern Ireland will become a more affordable visitor destination, and airlines will look afresh at the market, when this anomaly is swept away.

#### NI Business – A Change in Approach

A heavy responsibility falls to local business. Across every sector, the devolved administration has stated that the Private Sector will have to do more if the region is to achieve the re-balancing and re-building of the local economy. In short, local business must take the lead in driving forward what will amount to a sea-change in the way we conduct business.

The relationship between business and government has to be re-defined. The business community must feel confident enough to demonstrate greater initiative by identifying impediments and offering solutions rather than expecting Government to produce the panacea. Enterprises can increase levels of Research and Development (R&D), step up their presence in international markets, boost the marketing effort



and be more competitive, but without significant support from other participants in this venture, outcomes will be patchy, at best.

The fostering of greater ambition to succeed, along with the broadening of international perspectives to better develop and exploit the knowledge sector, are goals that will be more attainable once there is a re-defined 'balance of power' between the two sectors. The expectation is that this will lead to increased levels of reinvestment in core business activity, resulting in more and better quality jobs.

Northern Ireland business must:

Develop the hunger and ambition to grow

Assist in the doubling in size of the SME sector over the next 10 years

Have the courage to undertake responsible investment as confidence in the economy improves

Look afresh at Venture Capital and Equity Funding

Embrace a greater willingness to commercialise valuable research undertaken at our universities and in our indigenous business sector

Work with Government to become more export-orientated

Recognise the impediments to growth presented by family-owned businesses and work to change attitudes to outside funding sources

NI Government – A Change in Approach

Government sets the context for the economic change that has to happen. Conditions have to be created that allow business to take the lead with tangible support that falls well short of an interventionist role. Too much Government will stymie and restrict business.

Instead, the focus by Ministers should be on easing the burden of costly bureaucracy and eliminating the obstacles to prompt decision-making in such areas as planning and capital works.

There is anecdotal evidence that an overly bureaucratic Planning Service has cost Northern Ireland multi-million pound investments, particularly in the retail-leisure sector. Any loss of a major investment is intolerable and unacceptable. The Northern Ireland Executive must re-visit the constraints and restrictions under which the PS operates so that valuable business is not lost to the region.

The Northern Ireland suffers from 'consultation-itis' which causes delays and frustration. This tendency has to be set aside as a matter of priority.

Risk is part of success. Risk can also mean failure. However, in a Northern Ireland context, the balance between success and failure has developed into an unofficial

credo where the route of least resistance involves doing little or nothing to avoid any later excoriation. This situation has got to change. Change that embraces balanced risk is advocated.

Within the wider context, and with a keen eye on the positive impact that a reduced rate of Corporation Tax could have on the local economy, work is required on the overall effort to attract Foreign Direct Investment (FDI). The Society urges the NI Executive to re-examine the way it promotes and attracts new business to ensure that there is the right level of access and market penetration as well as best value-for-money.

### Chartered Accountants Ireland – A Change in Approach

Chartered Accountants Ulster Society will undertake a proactive education programme to promote alternative sources of finance and how these can bolster companies in Northern Ireland to grow and expand in the Global market. Chartered Accountants Ulster Society will be an active advocate for change both in terms of finance and mindset.

No amount of structural change will deliver what is required without buy-in from the business community. Alongside Chartered Accountants Ireland Ulster Society, other bodies will work to roll out a campaign to encourage entrepreneurship and business ambition. Crucially, these organisations will work to promote the benefits of having outside participation in the ownership of companies. The focus will be on the development of new funding streams, new export markets and tangible business objectives.

### Conclusion

That change is inevitable is not at issue. What is at issue is the extent of change that is required, what it means in practical terms, how attitudes have to change and how quickly the turn-around can be achieved. In the space that we currently occupy, we must be decisive. We must adopt a 'can do' approach. End risk aversion in the Public Sector. And implement measures without unnecessary or crippling delay.

Under-performance, lower productivity than elsewhere and a Public Sector that has undue caution as its watchword must end. In their place, there has to be scope to inspire, develop and succeed. A failure to act now will see Northern Ireland fading further into the economic 'backwaters'. The economic priorities set out by the Northern Ireland Executive – on R&D, innovation, employability, skills, the Global Economy, business growth and our economic infrastructure – are laudable in themselves, but words alone will not deliver results that are needed to transform and revitalise the economy. In the face of stern and testing economic conditions, we must grasp opportunities to do things differently and take the type of action that will pay dividends in the years to come.

## Chartered Institute of Housing



Response to the Draft Programme for Government 2011-2015:  
Building a Better Future

Chartered Institute of Housing

February 2012

The Chartered Institute of Housing (CIH) is the professional body for people involved in housing and communities. It is a registered charity with a diverse and growing membership of over 22,000 national and international members. CIH in Northern Ireland has over 500 members working for public, private and voluntary organisations and educational institutions. Our primary aim is to 'maximise the contribution that housing professionals make to the wellbeing of communities'. CIH seeks to achieve this by supporting a network of professionals in the sector through the development of policy and practice solutions, research, publications, training, events and professional qualifications.

### Introduction

CIH welcomes the publication of the Northern Ireland Executive's draft Programme for Government 2011-2015 (PfG) and the opportunity to comment on those proposals that relate to housing. There are a number of positive statements within the PfG that we as an organisation would concur with and welcome their inclusion in the draft document:

The need to link growing the economy with tackling poverty and deprivation;

Addressing regional imbalance;

Creating a more equitable society ; and

Delivering results against the commitments made by government

CIH believes that the guiding principles and priorities in the PfG are the right ones and we support the Executive's recognition that greater partnership working will be necessary to deliver the outcomes that the PfG aspires to. We believe that sharing expertise, experience and resources across the public, private and voluntary sectors will be integral in mitigating the impacts of the cuts to public expenditure and the subsequent effects of all aspects of our society, but in particular the most vulnerable and disadvantaged.

### General comments

The delay in publication of the PfG and the fact that the Northern Ireland Budget has already been set is problematic in some regards and there is a sense that the Executive's programme has been limited by the financial constraints. This has meant, for example, that the commitment to deliver 8,000 new social and affordable homes is predicated on what capital investment is available rather than the levels of housing need and identified figure of 2,500 new social homes required each year to meet that need.<sup>1</sup> CIH would also have anticipated that in addition to the economic and investment strategies there would be an indicative legislative programme published alongside the PfG.

This is a four-year programme and there must be a pragmatic approach to what can be achieved within four years. However, the PfG is limited in terms of its commitments, targets and milestones/outputs whilst remaining relatively ambitious in terms of its aspirations and objectives. Whilst appreciating the financial constraints placed upon the Executive and the work entailed in producing three interconnected programmes/strategies, there is both a lack of vision strategic direction and SMART actions and outcomes in relation to certain priorities and commitments within the document.

CIH welcomes the commitment in the PfG to work more effectively across government departments as this is particularly relevant to the development and delivery of good housing outcomes given that four Executive Departments have a role to play in achieving them. We do feel, however, that the PfG could be more explicit in stating how this can be realised and what mechanisms will be put in place to facilitate more joined-up government. Greater coherence and consistency across government would significantly improve both strategic decision making and operational delivery and although we are pleased to see this acknowledged in the PfG CIH would welcome more emphasis on how this can be engendered in practice.

### Growing a Sustainable Economy and Investing in the Future

We have focused our response on the second priority in the PfG and the housing-specific commitments contained within it. However, it is worth noting at the outset that we would also have expected to see greater mention made of housing in relation to the Executive's first priority of *Growing a Sustainable Economy and Investing in the Future*.

In the short to medium term investment in housing can help to rebuild the local economy and counteract the significant impacts that the recession has had on the construction sector in Northern Ireland. Investment in social and affordable housing creates jobs, including apprenticeships, and sustains the construction industry and local supply chains, as well as providing much-needed homes. The arguments about the multiplier effect and the economic benefits of investing in social housing have been well made in the past and are still relevant<sup>2</sup> – it is worth noting that the

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<sup>1</sup> The figure of 2,500 new social homes needed each year comes from the Common Waiting List and Net Stock Model developed by the University of Ulster for the Housing Executive. *Northern Ireland Housing Executive, Northern Ireland Housing Market Review and Perspectives 2011-2014*, p.49

<sup>2</sup> Michael Smyth and Mark Bailey, *Addressing the Economic Impact: The Case for Increased Investment in Social Housing* (University of Ulster, 2009)

Coalition Government have recognised the importance of housing in boosting the economy in their recently published housing strategy:

*Getting house building moving again is crucial for economic growth – housing has a direct impact on economic output, averaging 3 per cent of GDP in the past decade. For every new home built, up to two new jobs are created for a year. Without building new homes our economic recovery will take longer than it needs to.*<sup>3</sup>

The commitment to deliver 8,000 new social and affordable homes is linked to the reduced capital budget for housing for 2011-2015. It does not necessarily reflect the levels of need/demand for social/affordable housing or an additional boost to the construction sector. There is considerable scope to create more jobs, get more people in work and rebalance the economy by investing in housing as both a boost to the construction sector and supply chain. Recognising housing as an economic priority is also linked to sustainable growth and the creation of new jobs and investment in Northern Ireland.

CIH agrees with the findings of the Independent Review of Economic Policy in Northern Ireland that we must link places where firms are located to where workers wish to live. The Review also noted suggested that a lack of coordination and a failure to fully exploit the linkages of these hubs to other parts of the region has resulted in inhibited opportunities for growth in our urban areas.<sup>4</sup> CIH, taking into account the findings of the independent Commission on the Future for Housing in Northern Ireland, believes that housing can be an enabler for long term economic growth and that this should be adequately reflected in the PfG. Sufficient levels of supply of the right housing options for the whole population can directly affect employment opportunities, social mobility, regeneration and long-term economic growth.

We would also suggest that the Welfare Reform Bill should be factored into this priority, given the impacts that it is likely to have on the local economy, both in terms of reduced incomes resulting in reduced spending and the additional funding that will in all probability have to be provided by the Northern Ireland Executive to offset the impacts of reduced expenditure on some aspects of social security.

Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing

Both the Welsh and Scottish Governments, within their programmes for government, focus on housing as integral to a thriving economy, a fair and equitable society and meeting the needs and expectations of all of their people. Given that both of these devolved administrations have separate housing strategies; their programmes for government reflect the importance both place on housing as part of the public policy agenda. CIH would suggest that the Northern Ireland Executive should include a similar high-level summary of its vision for housing, strategic priorities and key actions in the PfG.

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<sup>3</sup> HM Government, *Laying the Foundations: A Housing Strategy for England* (November 2011) <http://www.communities.gov.uk/publications/housing/housingstrategy2011>

<sup>4</sup> Professor Richard Barnett, Independent Review of Economic Policy (DETI and Invest NI, 2009) [http://www.detini.gov.uk/independent\\_review\\_of\\_economic\\_policy-2.pdf](http://www.detini.gov.uk/independent_review_of_economic_policy-2.pdf)

The Minister for Social Development has made clear his intention to publish a Housing Strategy for Northern Ireland; therefore it is unclear why this is not referenced in the PfG as a key building block for both Priority 1 and Priority 2. CIH believes that a comprehensive, integrated and long-term housing strategy will provide much-needed focus on where limited resources should be targeted in order to deliver the best possible outcomes for people and communities. We welcome the commitment by the Minister for Social Development and his Department to develop a Housing Strategy for Northern Ireland and would like to see it recognised within the PfG as a commitment for the Executive as a whole.

Similarly the Homelessness Strategy and Supporting People Strategy are both close to being finalised, with the Homelessness Strategy in particular being an integrated strategy that includes a number of government departments. CIH would have expected both of these strategies and the commitments they represent to be reflected in the PfG. Whilst the Older People's Strategy is mentioned as a Priority 2 Building Block, CIH would suggest that there is also scope to include a commitment to consider the housing and support needs of our ageing population given the nature of demographic change in Northern Ireland. We believe that a Housing Strategy for Older People or inclusion of the housing needs of older people in the Housing Strategy should be a key commitment of government over the next four years. Without this, there is a risk that we will not be able to provide the housing options and opportunities that our older people need and deserve.

Although the Social Housing Development Programme is listed as a Building Block for the provision of decent, affordable, sustainable housing, CIH would also welcome the inclusion of a more strategic approach to housing within the document that encompasses a broader range of priorities and a more coherent and comprehensive vision. The provision of social and affordable housing and how housing need is met is undergoing a paradigm shift across the UK and Republic of Ireland. There are serious questions that must be addressed in Northern Ireland if we are to continue to deliver the housing outcomes that are needed now and in the future. Whilst the PfG could not be expected to pose those questions, we would suggest that the economic environment, constraints to public expenditure, challenges facing the construction sector and changes to the housing benefit system necessitate a wider debate on the role and purpose of housing in Northern Ireland.

The three key housing commitments outlined in the PfG – to deliver 8,000 social and affordable homes, introduce a range of initiatives aimed at tackling fuel poverty and improve the thermal efficiency of Housing Executive stock and ensure full double glazing in its properties – do not suggest a considered and sustainable approach to the supply, demand, choice, services, support and quality of housing in Northern Ireland. We believe that there is scope within the PfG to indicate that government is committed to a holistic approach to housing and that the inclusion of the Housing Strategy as a key Building Block would go some way to ensuring that this is reflected in the document.

We welcome the inclusion of the Social Housing Development Programme as a key Building Block in that it recognises the need for a social newbuild programme to meet housing need. However, given the reduced numbers of homes that can be provided within the available budget, we would suggest that the Empty Homes



strategy should also be included as a Building Block as a means of creating new housing opportunities. According to the latest housing statistics produced by the Department for Social Development there are 48,700 empty homes in Northern Ireland<sup>5</sup> and bringing even some of those properties back into use could help alleviate the pressure on the waiting list for social housing. Depending on the types of approaches used or facilitated they could also provide more affordable housing for ownership or rent. Scotland has developed a partnership approach to tackling empty homes<sup>6</sup> and the Empty Homes Agency in England has collated advice and best practice for individuals as well as lobbying government on the need to do more to address vacant housing stock. Whilst CIH believes that there is much that individuals, communities and housing organisations can do to bring empty homes back into use, there is also a strategic role for government in facilitating this process. We feel that it is important for the PfG to reflect the need to commit to tackling the problem of empty homes given the current budgetary constraints, the potential impacts of Welfare Reform on housing supply and the high numbers of vacant properties in Northern Ireland.

CIH would have some concerns that the housing commitments outlined in the PfG are an example of actions being undertaken with no clear sense of what the outcomes will be, for example: how many people will be helped out of housing stress through the building of 8,000 new social and affordable homes or to what degree will the full double glazing of all Housing Executive stock reduce levels of fuel poverty. We would like to see more synergy between what is being done with what is being achieved in terms of measurable and sustainable impacts.

CIH would also endorse the calls made by other housing organisations for a greater emphasis on financial inclusion measures within the PfG. The recession, increases in the cost of living and forthcoming changes to the social security system, namely the introduction of Universal Credit, all place a greater onus on personal responsibility for budgeting and the need for more financial capability. Social housing providers are already involved in supporting their tenants and are exploring ways in which they can work with other organisations such as Credit Unions to facilitate financial inclusion and affordable credit for those tenants who need this type of assistance. Whilst there is considerable work being done on the ground to meet the current financial challenges and those anticipated on the introduction of Universal Credit, there is also a need for financial inclusion and capability to be taken into account at a strategic level. CIH would welcome consideration given to this as an important commitment within the PfG to help tackle disadvantage.

Given the range of different funds, initiatives and programmes aimed at tackling disadvantage and alleviating hardship, there is a risk that strategic and targeted interventions will be difficult to achieve. CIH would suggest that consideration is given to how these resources can be best managed to ensure that those in most need receive most assistance, but also to prevent duplication of spending. The Total Place or Community Budgets approach would allow for spending to be directed from

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<sup>5</sup>Northern Ireland Housing Statistics 2010-2011, [http://www.dsdni.gov.uk/index/stats\\_and\\_research/stats-publications/stats-housing-publications/housing\\_stats/housing\\_statistics\\_2010-11.htm](http://www.dsdni.gov.uk/index/stats_and_research/stats-publications/stats-housing-publications/housing_stats/housing_statistics_2010-11.htm)

<sup>6</sup>[http://scotland.shelter.org.uk/housing\\_issues/more\\_homes/empty\\_homes](http://scotland.shelter.org.uk/housing_issues/more_homes/empty_homes)

across government at a neighbourhood or area level rather than a series of different funding streams and programmes from a number of government departments.

This priority also includes a commitment to establish an advisory group to assist Ministers in alleviating hardship, including any implications of Welfare Reform. CIH welcomes this proposal and the focus on Welfare Reform as an area where the Executive will wish to seek expert advice. We would suggest that one of the key actions that will be necessary to determine how hardship can be alleviated will be in assessing the impacts of the Welfare Reform agenda at a local level, taking into account other economic and social factors. Working with representative bodies and front-line service providers will be an important step in developing a framework for policy impact assessments that can provide the much-needed evidence base upon which to make decisions about mitigation and the direction of resources. CIH believes, based upon our own research and engagement with our members, that the changes to housing benefit will create a number of challenges for government, key departments and agencies and housing and advice organisations as well as for tenants in the social and private rented sectors who rely on housing benefit to pay their rent. We would therefore suggest that the advisory group has a strong housing focus in order to be able to fully support the work of Executive Sub-Committee on Welfare Reform.

## Conclusion

Whilst we welcome those housing commitments detailed within the draft Programme for Government, CIH would like to see the inclusion of a more explicit vision and strategic direction for housing in the document. We also believe that key housing strategies, including the forthcoming Housing Strategy for Northern Ireland, and their aims/objectives should be reflected in the PfG.

CIH continues to make the case for housing as more than bricks and mortar. Housing has implications for virtually all other aspects of public policy and can act as an enabler for better economic, education, health, wellbeing and social outcomes. We hope that the PfG will recognise the vital role that housing can and should play in the creation of a more sustainable economy, an educated and highly skilled workforce, more cohesive communities and a healthier population.



## The Chartered Institution of Wastes Management (CIWM)



# The Chartered Institution of Wastes Management

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents around 7,000 waste management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste management industry and has various grades of membership determined by education, qualification and experience.

Draft Programme For Government 2011-15

CIWM NI is the centre for Northern Ireland that represents CIWM members specifically in Northern Ireland and their comments have helped form this response.

### INTRODUCTION

The Draft Programme for Government 2011-15 presents an opportunity to provide high level strategic support and commitment for much needed improvement in resource management for Northern Ireland particularly with respect to waste. An initial review of the document would seem to indicate, disappointingly, that the Executive has not been sufficiently definitive or challenging in the Programme for Government and has not included sufficient SMART targets.

### EXECUTIVE SUMMARY

The main comments from CIWM NI can be summarised as follows.

#### Key Commitments

Additional commitments on waste to reflect waste prevention and life cycle approach to resource management should be included.

Commitment needed relating to government support for the provision of an adequate network of waste management facilities.

More SMART targets.

Priority 3: Protecting Our People, the Environment and Creating Safer Communities

Broaden scope to proportionately reflect the roles of all aspects of the waste hierarchy;

Introduce suitable incremental targets for a reduction in greenhouse gases;

Targets in household waste recycling noted;

No target for the publication of a revised National Waste Strategy;

No reference to anything pertaining to new waste infrastructure unlike other similar services particular to waste infrastructure e.g. water and sewerage;

Lack of reference to government support or funding, similar to the approach to the English National infrastructure Plan advocated; and

Waste streams other than households need to be addressed i.e. industrial and commercial.

#### Funding

Greater level of government funding for the development of critical waste infrastructure advocated;

More focus on innovative funding and the use of the Green Investment Bank.

#### Other Issues

Measures to improve policy integration required;

Reform and prioritisation of processing of key waste infrastructure development required;

Development of preparatory measures to address post 2015 situation should be included; and

Leadership at all levels needs to be encouraged and more evident.

#### Overarching Strategic Benefits

The drafting of a new Programme for Government presents a clear opportunity for innovation in strategic planning for Northern Ireland, even within limited resources. In the current unstable economic climate, there has never been a greater need for an integrated approach to government working, for 'joined-up thinking' and to make best use of resources across the public sector, to assist in rebalancing the economy. This is also clearly identified in the Investment Strategy for NI 2011-21.

*Key Commitment - Reduce the Environmental Impacts from the waste we generate (DOE)*

It is disappointing that only one of the 76 commitments specifically relates to waste i.e. reduce the environmental impacts from the waste we generate. This commitment would appear to be fairly narrow in its context and does not take account of wider aspects associated with waste prevention and life cycle approach to resource management. Consequently we consider there is merit in adding additional commitments which suitably cover this aspect.

We also feel that there is a conspicuous absence of a robust commitment to government support for the provision of an adequate and suitable network of infrastructure to ensure more sustainable management of waste, particularly that in respect of municipal waste.

*Priority 3: Protecting Our People, the Environment and Creating Safer Communities*

The following comments are submitted, for your consideration:

The sixth bullet point “more people recycling waste and adopting sustainable lifestyles” appears to place a disproportionate emphasis on recycling and does not properly reflect the need to move more waste up the waste hierarchy e.g. prevention and recovery.

The key commitment and milestones/outputs associated with reductions in greenhouse gas reductions whilst welcome in principle appear to us to lack definition. We feel this section would merit more specific text particularly with respect to incremental targets towards meeting the 2025 target, similar to the approach adopted to household recycling rates.

The key commitment and milestones/outputs associated with the publication of a revised Biodiversity Strategy are welcome.

The key commitment and milestones/outputs associated with reducing the environmental impacts from the waste we generate i.e. recycling rates for household waste is noted. It is worth mentioning that the 2014/15 target is inconsistent with the relevant target in the current National Waste Strategy which specifies 40% recycling of household waste by 2015. However, the increasing targets are compatible with attaining the relevant target in the revised Waste Framework Directive i.e. 50% by 2020.

There is no commitment to producing and publishing a revised National Waste Strategy similar to the approach adopted with other significant strategic documents e.g. revised Biodiversity Strategy. It is understood a revised National Waste Strategy is scheduled to be published by the end of 2012, in accordance with the Revised Waste Framework Directive requirements.

There is no mention, commitment or targets in connection with new waste infrastructure as articulated within other strategic documents e.g. more improved modes of sustainable transport or water and sewerage infrastructure.

The funding for waste infrastructure does not sufficiently or adequately reflect that it entails the provision of critical regional infrastructure, and it is essential that this is appropriately reflected in government planning and policy documents such as this. Note should be taken of the approach by Central Government in England within the National Infrastructure Plan and the use of the Green Investment Bank, and we would propose that a similar approach be taken here.

The only waste stream mentioned is household waste with no reference to the other controlled waste streams, such as industrial or commercial waste, which form a large

and critical proportion of Northern Ireland's waste. Accordingly, appropriate commitments and milestones/outputs for these waste streams should be articulated.

### *Strategic Funding Support for Waste Management Infrastructure*

#### General

The development of major waste infrastructure in Northern Ireland is beyond the financial capacity of local government. This was previously acknowledged by a former Minister, Angela Smith and reinforced by the Departmental Strategic Business Case for Waste Management Funding in Northern Ireland which was published in June 2007.

This Business Case formed the basis for the Executive to include a substantial funding package in the Investment Strategy 2008-18 at a level of £200m or approximately 50% of the capital cost.

This critical issue has been addressed to a large extent in other regions of the UK, with a range of capital and revenue support schemes available to assist local authorities with the substantial additional financial burden of providing modern waste infrastructure in compliance with the EU regulations, with particular reference to the Proximity Principle and the Principle of Self Sufficiency.

This type and scale of support from central government offers the degree of certainty required to facilitate long term financial planning and investment. Crucially, it also provides the private sector waste providers, and their funders, with the high level of comfort they require to attract them to invest heavily in the waste sector.

We consider that the public interest in Northern Ireland would be better served by less sporadic and more adequate provision of project funding support on waste management, particularly in the development of waste infrastructure. It is suggested that major waste facilities be viewed as critical regional infrastructure by government, in the same vein as transport, water and sewage infrastructure, for example. A suitable level of support properly programmed will also assist with the prime aims associated with the economy and employment.

#### SWIF Support

As you are aware, the vast majority of the funding support, originally made available for the development of the waste infrastructure, has been withdrawn by central government - representing a drop from £200m in the last CSR to only £2m in the current CSR.

This level of reduction in establishing regionally significant infrastructure is extremely challenging to absorb particularly at relatively advanced stages in the programme and increases the risk profile against delivery.

It should be noted that Northern Ireland is now unique relative to the other Devolved Administrations in its lack of financial support for the construction and operation of

mission-critical waste infrastructure and the step changes required in terms of the capital programme.

### Capital and Revenue Contributions Support

The largest element of the SWIF funding was contemplated to be used to abate the capital cost of the critical infrastructure, by way of Capital Contributions, to mitigate the level of borrowing that is required for infrastructure of this scale.

Notwithstanding the quantum of support, CIWM NI would advocate revenue support as a more appropriate method and accordingly its application would be more favourable. We would urge the Department to continue to look for this in tandem with capital support as an alternative or supplementary solution.

### *Other Issues*

#### Policy Integration

The PfG document would benefit from outlining particular commitments and associated measures which will result in a much enhanced approach to the integration of strategic policy development.

Specific elements are outlined below:

Integration of waste (resource) management with R&D and economic development;

Integration of energy policy with waste policy e.g. Single electricity market and renewable obligation certificates;

Integration of food security with energy and waste policy;

Integration of waste policy across the sectors e.g. municipal, agricultural, industrial, etc.; and

Integration of waste infrastructure geographically and with land-use and transportation planning.

It should be noted that, allied to greater policy integration, is a need for policy stability. A prevailing climate of policy stability will also help to engender confidence within the private sector to invest in infrastructure development.

#### Planning and Permitting

The difficulties with the various regulatory regimes associated with waste infrastructure have been well documented.

In this respect the PfG has a large number of extremely laudable commitments, focused on regeneration, the public landscape, accelerated planning decisions, delivery of social and affordable housing, and a few very specific plans. To date, however, less than half of Northern Ireland has up-to-date draft or adopted

development plans. This is likely to reach zero coverage by the end of this Assembly mandate.

There is a gap evident, regarding a commitment to ensure the development of appropriate spatial, development and community plans for Northern Ireland, which can only be achieved in partnership with local authorities. This gap is noted as critical to ALL Priorities.

In terms of the development of major waste infrastructure, it will be important this is given priority in terms of the expedient processing through the various regimes, as pertains in the other Administrations e.g. through (inter alia) new planning processes; National Planning Frameworks; call-in; and Statements of Need.

### Timing

Clearly there is a timing difficulty, with work only re-commencing on local government reform legislation in 2012. However the lack of plan coverage is likely to impact on the ability to spend allocated monies e.g. through the Social Investment Fund, during this Assembly mandate.

This emphasises the concern that the focus on local government reform within the Programme is purely structural, and that the opportunity to prepare for a new post-2015 system has not been taken within the document.

### Leadership

There is no doubt that establishing new waste infrastructure will continue to be a contentious issue. The successful delivery of such will be greatly improved if central government, particularly at a political level, is able to demonstrate and display strong leadership. Influencing people's attitudes and behaviour is vital to the changes that will be brought about by developing new facilities which demands robust leadership from the highest level. It will be important that public bodies and figures all play their part to the full in this regard.

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CIWM NI

22 February 2012

## Chartered Society of Physiotherapy Northern Ireland

PROGRAMME FOR GOVERNMENT – 2011-15 – CONSULTATION REPLY PROFORMA	
Name:	
Organisation:	Chartered Society of Physiotherapy Northern Ireland
Contact Details:	Arthur House, Arthur Street, Belfast BT1 4GB

### Question 1

Do you agree that the Programme for Government is designed and balanced in a way that is appropriate in enabling the delivery of its priorities?

If you do not agree, please explain why and what alternatives you would propose.  
(No more than 500 words)

Question 1 The Chartered Society of Physiotherapy supports the intention expressed in the Programme for Government to modernise and reform the delivery of health and social care to improve the quality of services provided. The health service in Northern Ireland is undergoing significant and fundamental reform which will require changes to the way all health staff work if improvements in the delivery of services are to be realised. The reforms currently taking place can only succeed if physiotherapists and other Allied Health Professionals (AHPs) are an integral part of this modernisation process. At present appropriate strategic representation at DHSSPS level is inadequate and will therefore not facilitate the delivery of the priorities detailed in the Programme for Government.

It is clear that there are significant financial challenges on the overall budget allocation for Northern Ireland. It is essential therefore that those resources are used to maximum effect and targeted on those populations in most need and on an equitable basis. There is concern that the finances allocated to the DHSSPS will not provide the necessary resources, in terms of capacity, to bring about the proposed shift in the delivery of services to primary and community settings to meet the future demands and needs of the population in Northern Ireland. In addition over the next twenty years the demand for health and social services will increase due to demographic changes. In particular an increased elderly population will have major implications for health care provision and will result in a higher incidence of chronic long-term conditions. Government needs to be aware that demand for services and public expectations, have, and will, continue to increase. It is unclear at this point in time if the proposed shift in services to a primary/community setting will be matched by a similar shift in resources.

Public Health in particular is becoming a core priority for all governments and this is acknowledged in the Programme for Government. Modern healthcare policy is increasingly focused on the promotion of health and wellbeing and the prevention of ill health. A Public Health approach, which replaces a system primarily focused on managing ill health, is now absolutely central to health and social care policy. However, while the CSP fully supports the intention in the Programme for



Government to allocate increasing resources from the overall health budget to Public Health we would make the point that the Department of Health alone should not be allocating additional resources to Public Health. The causes of ill health and inequality cut across all spheres of government. Promoting solutions to the causes of poor health should be a collective Executive responsibility. Other Executive departments in particular, Education, Social Development, Criminal Justice, Employment and Learning, Finance and Personnel and Environment need to examine their commitment and contribution to the overall Public Health agenda. There needs to a firm and explicit commitment in the Programme for Government as to how other departments can contribute more fully to public health and how this should be effectively coordinated.

## Question 2

Do you agree that the Programme for Government sufficiently links the key commitments to plans for delivery? If you do not agree, please explain why and what alternatives would you propose. (*No more than 500 words*)

## Question 2

The Programme for Government makes a specific commitment to “further reduce the levels of sick absence across the Northern Ireland Civil Service” and states that it will reduce the average number of sick days from 10.4 to 8.5 by 2014/15. The document however does not provide any details as to how it will achieve this. The overall cost of sickness absence for 2010/11 is estimated at £25.5 million through lost production and reveals that 11.2% of all absence is accounted for as a result of “Back Pain and “Other Musculoskeletal Problems”.

The Northern Ireland Audit Office Report entitled “The Management of Sickness Absence in the Northern Ireland Civil Service” published in May 2008 found that a pilot providing early access to physiotherapy to staff with musculoskeletal disorders such as low back pain and acute muscle injuries reported that, of those at work, 80% indicated that physiotherapy had prevented them from going absent and, of those already off sick, over 80% indicated that physiotherapy had shortened their absence. Respondents indicated that the service shortened their absence by an average of six weeks. The report concluded, “We have seen no evidence of any formal consideration of this project or of extending provision further.” Despite the fact that the DFP reported that, the physiotherapy scheme has proved a cost-effective and helpful intervention for staff with early musculoskeletal disorders”, the scheme was discontinued.

Early access to physiotherapy services is proven to limit the time that people need to be absent from work and is cost effective. Research has shown that for every £1 spent, employers get £3 back in savings. If the Programme for Government really wants to reduce sickness absence across the civil service, providing the resources and funding so that physiotherapy can be made available at an early stage will be essential. The CSP would recommend therefore that the Northern Ireland Executive reestablish the early access to physiotherapy scheme and roll this out on a departmental wide basis as a matter of urgency.

In addition the Programme for Government makes no reference to tackling workplace ill health across other public services including local government and the health service which also report some of the highest sickness absences across the UK. The CSP recommends that the NI Executive needs to take a more robust approach to tackling workplace ill health generally and should look closely at the recommendations in 'Working for a Healthier Tomorrow' which recommends that comprehensive service reform should be combined with a cultural shift in workplaces across the economy.

Physiotherapists and other allied health professionals are in a prime position to help keep employees healthy by enabling the individual to understand prevention of disease chronicity, re-occurrence, and strategies to self-manage effectively. The expansion and introduction of occupational health schemes is not only in the interests of the individual affected, but also saves employers, the health services and society money and improves productivity.

### Question 3

Do you agree that, in general, the key commitments contained within the document are appropriate to the successful achievement of priorities? If you do not agree, please explain why and identify any potential gaps that may exist. *(No more than 500 words)*

### Question 3

One of the Key Commitments in the Programme for Government states that it will “Enrol people who have a long-term (chronic) condition, and who want to be enrolled, in a dedicated chronic condition management programme (DHSSPS)”.

The CSP agrees with the need to address the issue of long term conditions. A major aspect of public health involves tackling social inequalities in health. The major killers, such as stroke and chronic heart disease, are linked to socio-economic inequality, with risk factors such as smoking being much higher among people in deprived areas. An estimated 30 per cent of cases of coronary heart disease in under-65s, and 25 per cent of all cancers, could be prevented through public health measures to encourage healthier lifestyles.

Key public health issues include physical activity, childhood obesity, work health, and the health of older people. Physiotherapists can play a key role addressing many of these issues – for example, by raising awareness of the links between a musculoskeletal conditions such as back pain and contributory factors such as poor diet, lack of exercise and obesity, and helping people set goals and follow-up advice.

The physiotherapy workforce has a key role to play in the public health agenda, particularly through the biopsychosocial approach to early intervention, the prevention and management of chronic and long-term conditions, rehabilitation, keeping people fit for work and promoting a healthy lifestyle.

### Question 4

Do you agree the Programme for Government is appropriately balanced in terms of sub-regional recognition?

If you do not agree, please explain why and provide supporting information. *(No more than 500 words)*

Question 4

The CSP has no comment to make on this section

Question 5

Do you agree that the Programme for Government is appropriately balanced in terms of its recognition of major sectoral issues? If you do not agree, please explain why and highlight any major sectoral issues for consideration. *(No more than 500 words)*

Question 5

As already stated the Programme for Government places a disproportionate responsibility for tackling issues of ill health and inequality on the DHSSPS. In relation to tackling health inequalities the Marmot Review clearly articulates that action taken by the Department of Health and the health service alone will not reduce health inequalities and that central and local government also need to take responsibility for the health and wellbeing of communities, through policies that fully address the social determinants of health.

Not only has the gap between the health of different populations been maintained, it has in some cases increased, despite ongoing governmental commitment to social justice and reducing health inequalities. The disparity between the policy goal and the reality in practice is due to failure of policies to fully tackle these social determinants of health. In addition to the growing pressure to address health inequalities on the grounds of social justice, there is also a strong economic argument to be made. Investment in reducing inequalities and preventing ill health will significantly reduce the burden of chronic disease being placed on the already overstretched health services.

Question 6

Do you agree that the Programme for Government presents its priorities and commitments in a way that is fair and inclusive to all? If you do not agree, please explain why. *(No more than 500 words)*

Question 6

The CSP has no comment to make on this section.

Question 7 Are there any other issues in the Programme for Government that you wish to comment on? *(No more than 500 words)*

Question 7

The CSP agrees that funding alone will not address all of the issues within the Programme for Government and supports the view that modernisation and reform of health and social care services will have a significant part to play in the provision and delivery of those services. However, there is considerable concern across the profession that the finances allocated to the Department of Health, Social Services and Public Safety as a result of the reduced block grant get will not provide the resources required to meet the future demands and needs of patients in Northern Ireland. Reducing the annual real growth in health from what it has been over recent years will present a significant challenge to the DHSSPS in delivering the promised improvements in productivity and service provision to patients.

The CSP acknowledges there is clearly a gap between the level of funding currently (and historically) provided and the level of demand that it is aiming to meet. The main problem is less one of deciding the appropriate level of funding than of ensuring stability of funding, whilst developing ways of targeting the spending resources that acknowledge the different agendas of government and those involved in running and providing the service. However the CSP maintains that the essential precondition to improving services and meeting the priorities set out in the Programme for Government will require an increase in the financial allocation currently set out in the draft budget. There is also a need to ensure that existing funding is allocated carefully to ensure that resources are used to maximum effect.

## Children & Young People's Strategic Partnership



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19th February

Dear First Minister and Deputy First Minister

**PROGRAMME FOR GOVERNMENT: EARLY INTERVENTION TO IMPROVE  
OUTCOMES FOR CHILDREN AND YOUNG PEOPLE.**

I am writing in response to the consultation on the Programme for Government, on behalf of the Children and Young People's Strategic Partnership (CYPSP), which I chair.

The CYPSP consists of the leadership of all statutory agencies concerned with children's lives, and representatives from the community, voluntary and Black and Minority Ethnic sectors.

Please see attached membership. The purpose of the CYPSP is to plan together how to improve the lives of all our children and young people and carry out, together, those improvements to supports and services that we could not achieve alone.

As you will appreciate, each agency on the CYPSP has its own governance arrangements and duties to individual Departments of Government in relation to work that must be carried out, and ways in which funding must be spent. These duties and reporting arrangements will always be paramount for any agency. In addition to these individual responsibilities towards children and young people we wish to unite our efforts where we can, to make more efficient and effective use of our resources. However, we are very aware that, for this joined up approach to improving children's lives to be most effective, we need support from across Government departments for an integrated approach.

In particular, we have decided use our combined efforts to make it more possible for more children and young people to have their needs met at a very early stage, rather than waiting until great difficulties have developed for children, resulting in blighted lives for lack of support at the right time.

Therefore, we have made early intervention one of our own key joint objectives. We will be working on how we can best use our partnership to drive forward early intervention at agency level. In order for the statutory constituent agencies of the CYPSP to take this forward most effectively, each needs to be mandated by their respective Government Department, all of which, in turn, need to be mandated to work together on this by a joint Executive strategic imperative for early intervention.

#### Recommendation

The Programme for Government should include a commitment to early intervention for children and young people, mandating Departments to link together those strategies which include early intervention, and facilitating integrated planning and commissioning of early intervention through the Children and Young People's Strategic Partnership.

This recommendation echoes similar recommendations within the draft Report on the Review of the Youth Justice System in Northern Ireland.

The CYPSP, following on from its strategic decision to focus on early intervention, is working on a detailed shared understanding of what we, together, mean by early intervention, which will then influence our integrated planning and commissioning.

To this end, the CYPSP has established a strategic group – the Early Intervention Sub Group, made up of Partnership members only, to arrive at this joint understanding. The Early Intervention Sub Group has considered the attached paper, has agreed its recommendations, and has agreed to adopt the following definition of early intervention;-

Early intervention is 'intervening early and as soon as possible to tackle problems emerging for children, young people and their families or with a population at risk of developing problems. Early intervention may occur at any point in a child's life' (Grasping the Nettle' Report 2009). The CYPSP notes that this definition includes the intergenerational aspect of early intervention and the term 'population at risk' includes specific geographical communities.

You will see from the attached paper that the first recommendation is to seek a joint governmental priority for early intervention, which should include a set of achievable outcomes. It is for this reason that I am seeking this inclusion within the Programme for Government.

Yours sincerely

John Compton

Chair

CYPSP

Children and Young People's Strategic Partnership Recommendations: How to make Northern Ireland an Early Intervention Region.

Children and Young People's Strategic Partnership Recommendations:

How to make Northern Ireland an Early Intervention Region.

DRAFT 2; 21/2/12

Executive Summary

CYPSP Recommendations: How to make Northern Ireland an Early Intervention Region.

Appendix A. CYPSP Position Paper - Can Northern Ireland Be Designated An Early Intervention Region?

How are best outcomes for children achieved? – lessons from Developed Countries

Early Intervention – Key Messages

Why focus on Early Intervention?

What is Early Intervention?

How should Early Intervention be Measured?

How should Early Intervention be Delivered?

References and Bibliography

Appendices

CYPSP Partner Agencies

What is Already in Place to Develop an Early Intervention Strategy – Voluntary and Community Sector



## What is Already in Place to Develop an Early Intervention Strategy – Statutory Sector

### UNICEF Rankings for Developed Countries

### N.I. Family Support Model

### Family Support Hubs

#### 1. Executive Summary.

This paper sets out the position on early intervention of the Children and Young People's Strategic Partnership (CYPSP), the statutory Northern Ireland wide partnership mandated to improve outcomes for children and young people through integrated planning and commissioning of services across Northern Ireland. The CYPSP, formed in 2011 and building on previous partnerships, has identified the promotion of early intervention as a key strategic priority. The paper draws on recent UK reports, in order to situate the CYPSP's consideration of this issue within the current debate, and provides some commentary on central themes of these reports. The paper is not a literature review, nor does it seek to review baseline services for any sector.

The research findings in relation to the importance of early intervention are unambiguous: poor nutrition, maternal and family stress, and poverty, affect brain development from the prenatal period or earlier. There is considerable evidence of the negative impact of neglect on the developing brain. Major studies, such as the ACE study, conclude that adverse childhood experiences have a profound, proportionate and long lasting effect on well-being. The research evidence is summarized in the UNICEF (2010) report 'The Children Left Behind'. The task of redressing the impacts of disadvantage in childhood will take at least the life span of a generation to achieve – a central theme is preparation of parents who will raise the next generation of children.

The most important resource available to Northern Ireland is its population of children and young people. Any Programme for Government needs to incorporate measures to cultivate and promote enhanced well-being of children and young people. Every child and young person has the right to a range of experiences, environments and supports to help them grow into confident, articulate and empowered adults capable of contributing positively to society and to the economy. This is a long term initiative which will need to be judged over some 20 years – at least the life span of a generation - and which will require Government commitment to restructuring expectations, processes and funding priorities in order to achieve better outcomes for children and young people.

**DEFINITION.** The CYPSP has adopted the following broad and inclusive definition of early intervention, which was developed by the Centre for Excellence and Outcomes for Children and Young People (CE04),

Early intervention is 'intervening early and as soon as possible to tackle problems emerging for children, young people and their families or with a population at risk of

developing problems. Early intervention may occur at any point in a child's life' (Grasping the Nettle' Report 2009).

The CYPSP notes that this definition includes the intergenerational aspect of early intervention and the term 'population at risk' includes specific geographical communities.

The CYPSP agrees the following actions to take forward its strategic priority of promoting early intervention:-

The CYPSP will seek from Government

a joint Governmental strategy for early intervention, which should include a set of achievable outcomes

a long term shift in resources which is comparable to Northern European countries

In the meantime, in relation to integrated work at agency level, the CYPSP will;

Review existing strategies on early intervention

Profile the service infrastructure currently available to deliver an early intervention strategy – this includes universal statutory provision and additional provision

Develop an action plan for commissioning early intervention across Northern Ireland as required

Measure the effectiveness of early intervention through

Tracking population level trends

Gathering and evaluating existing research on how to use early intervention to promote better outcomes

Carrying out a baseline audit of the quality of early intervention programmes in place in Northern Ireland

Reviewing the progress of the RCT based programmes in Northern Ireland

Developing a standardised framework for the evaluation of early intervention programmes across Northern Ireland

Developing an evaluation framework to measure the effectiveness of integrated delivery of early intervention.

The Northern Ireland Executive has provided a framework in relation to children and young people's outcomes. It has set out, in its strategy for children and young people 'Our Children and Young People: Our Pledge' 6 high level outcomes which all agencies within Northern Ireland should be working together to improve (OFMDFM 2006). The effectiveness of early intervention programmes in Northern Ireland,

therefore, will be judged according to whether and how much they have contributed to the well-being of Northern Ireland's population of children and young people measured with reference to the outcomes framework.

#### CYPSP Recommendations: How to make Northern Ireland an Early Intervention Region.

These recommendations have been adopted by the Children and Young People's Strategic Partnership Early Intervention Sub Group after consideration of the detailed position paper attached at Appendix A.

#### Definition

The CYPSP has agreed that early intervention relates to early years and early stage of difficulty. It also accepts a 'whole society' approach to early intervention – through ensuring that a network of supports and services is present and applicable to address children's rights and needs when and where needed, and promoting an ownership within the community at large of the benefits of early intervention. Important underpinning themes include those of cycles of disadvantage, building resilience, redressing the impact of poverty, time span (generational), and improving outcomes.

The CYPSP has adopted the following broad and inclusive definition of early intervention, which was developed by the Centre for Excellence and Outcomes for Children and Young People (CE04):-

Early intervention is 'intervening early and as soon as possible to tackle problems emerging for children, young people and their families or with a population at risk of developing problems. Early intervention may occur at any point in a child's life' (Grasping the Nettle' Report 2009).

The CYPSP notes that this definition includes the intergenerational aspect of early intervention and the term 'population at risk' includes specific geographical communities.

#### Government Mandate and a Coordinated Strategy

A mandate from the Northern Ireland Executive for Early Intervention as a joint Government priority is needed to support Departments and Agencies to work in an integrated way at different levels to make best use of available resources for Early Intervention. This approach needs to emphasise the link between improved outcomes for children and young people and the wider societal themes of the economy and workforce, civic engagement, community stability and public safety. (It is noted that such a recommendation has already been made in the Report of the Review of the Youth Justice System in Northern Ireland (DoJ, 2011).

#### Recommendation 1

The CYPSP seeks a joint Governmental strategy for early intervention, which should include a set of achievable outcomes.

The governmental strategy should be accompanied by guidance on how agencies and the voluntary sector should work in partnership to deliver it, based on best practice. The accountability processes, delivery targets and performance management criteria for statutory agencies need to be revised to give clear policy direction and momentum to working at early intervention, in partnerships, and towards common outcome based criteria. Likewise, contract and performance management criteria for government funding for the Voluntary and Community sectors need to be reviewed. Such a fundamental shift requires to be mandated at Executive and Departmental level.

## 2.4 Development Model

UNICEF has clearly demonstrated that countries which have committed to universal and easily accessible provision of early intervention services, backed up by and integrated with specialized services for children with additional needs, achieve the best outcomes for children and young people.

In Northern Ireland there is a mix of universal and targeted provision, unevenly spread.

### Recommendation 2

The CYPSP will seek a long term shift in resources which is comparable to the Northern European countries.

In the interim the CYPSP will support incremental improvement and co-ordination of existing programmes (universal and targeted), together with investment of resources in specific targeted programmes.

## 2.5 Added Value

The remit of the CYPSP provides it with a significant opportunities to add value in relation to Early Intervention, as follows;

Outcomes; the measurement of outcomes for children and young people is being tracked collectively across a range of indicators which are wider than the remit of any single agency. This will be built upon by developing level 2 (Hardiker) indicators which are capable of measuring Early Intervention.

Efficiency; to achieve the most efficient and productive use of all existing resources – and to develop the potential for better co-ordination of planning and commissioning to achieve better use of what is currently available.

Equality; to address the uneven development of services and of accessibility of services to disadvantaged groups and localities

Integrated Planning; partnership working is essential to ensure that services are designed to connect seamlessly with the needs of children and young people at the point of delivery

Access; to mandate agencies and services to work together locally to enhance accessibility of services to all children and young people through the Family Support Hub model, (See APPENDIX 6)

Strategic Influencing; to develop a collective position in relation to improving outcomes for children and young people which can influence government spending priorities

## 2.6 Strategic Scan

The existence of the CYPSP, with membership from all relevant agencies at Chief Executive level, provides, for the first time, a strategic framework and mandate for a Northern Ireland wide delivery model for Early Intervention. This creates the possibility of effectively linking strategies on Early Intervention which are being developed by a range of Government Departments, including OFMDFM (Our Children and Young People, Our Pledge), DHSSPS (A Healthier Future, Families Matter), DE (Every School a Good School and the pending Strategy for 0-6), DSD (People and Place – a Strategy for Neighbourhood Renewal), DoJ (Framework for the Prevention of Offending, Community Safety Strategy).

Core connecting themes in the Early Intervention element of these strategies include those of;

Evidencing improved outcomes for children and young people

Supporting and empowering parents and families

Care and education for 0-6

Improving Safeguarding of children and young people

Supporting the contribution of children, young people and their families to communities (Building Social Capital)

Addressing Health and Well-being Inequalities

Improving foundations for Better Physical, Emotional and Mental Health

Improving foundations for Achievement and Education

Improving Community Safety and Prevention of Offending

### Recommendation 3

The CYPSP will carry out a review of existing strategies, in order to consider where they can be harmonised in order to maximize impact on Early Intervention, and to identify gaps that need to be addressed collectively. This approach would fit with the recommendations of the Draft Report of the Review of the Youth Justice System in Northern Ireland (DoJ, 2011), in relation to Early Intervention.

## 2.7 Current Service Configuration

Universal services to promote the health and well-being of children and young people are delivered primarily by the statutory Health and Education sectors. A range of targeted services for children and young people with additional needs are delivered by statutory agencies, by voluntary agencies, and (in relation to specific localities) by the community sector. There is evidence that the distribution of locally accessible services to assist children, young people and families at the point of early onset of difficulties is uneven throughout the region. Areas of good practice, gaps in provision and opportunities for enhanced working to address the gaps need to be identified. There is evidence that the profile of the community and voluntary sectors in relation to policy and service delivery in the area of early intervention is enhanced in Northern Ireland compared to other regions of the U.K. This needs to be considered in relation to its ability to support the statutory provision. This approach would also fit with that suggested in the Review of Youth Justice in Northern Ireland (DoJ, 2011).

### Recommendation 4

The CYPSP will profile the service infrastructure currently available to deliver an early intervention strategy – this includes universal statutory provision and additional provision.

## 2.8 Action Plan for commissioning early intervention across Northern Ireland.

The CYPSP oversees a three level structure of planning which provides the Statutory, Voluntary and Community sectors with a mechanism for ensuring integration of planning and commissioning, with agreed outcome measures.

### Recommendation 5

The CYPSP will develop an Early Intervention Plan capable of addressing the following four age ranges for intervention;

Pre-conception/conception; to create the best conditions for the pre-natal stage

0-3; to maximize support according to need at the earliest stage

3 Plus; a range of services, with emphasis on health and education, available locally, to support family living.

Post primary;

infusing the post primary curriculum with a greater understanding of the broad principles of parenting and the impact of the environment on a child growing up

as well as a range of services with emphasis on supporting the young person growing to adulthood with improved outcomes

## 2.9 Planning Instruments

The Northern Ireland Family Support Model (APPENDIX 6) is established as a planning instrument to support emphasis on prevention and early intervention services. The model, which is multi-agency and cross-sectoral, has been incorporated into the development of the High level Outcomes Framework (OFMDFM 2006), and has been influential in Departmental Strategy (DHSSPS 2009, DoJ 2010 etc). It has provided a framework for integrated planning, based on the assertion that services which work best for children and young people and their families are those that are a) accessible universally, with additional provision for children with additional needs b) integrated at the point of delivery to the child or young person. The more recent concept of 'progressive universalism' is consistent with this conceptual framework. The application of the model in Northern Ireland has been uneven to date, because of the differential development of integrated planning across the region. The CYPSP endorses this broad and inclusive approach to the planning of services for children and young people.

## 2.10 Sectoral Commitment to Early Intervention

Northern Ireland has relatively well developed voluntary and community sectors. However, the profiling of children, young people and families has been uneven, and the resourcing available to the sectors has not been fully utilized to improve outcomes. Building social capital through promoting better outcomes for children and families will be considered by the community and voluntary sector agencies on the CYPSP as to whether they could take this forward as an agreed priority across their sector.

Statutory sector agencies are held accountable to Government through a range of performance targets and measures set by Departments, and it is for this reason that any significant shift in application of statutory resources requires to be mandated across Departments. Statutory partners on the CYPSP will consider the following actions

the statutory partners on the CYPSP take steps to review their business planning processes in order to maximize current opportunities for collaborative planning for Early Intervention;

that they utilize and develop the outcomes based framework for measurement;

and that they undertake to address the Early Intervention agenda and Outcomes measurement in accountability reviews with their respective Departments.

## 2.11 Measurement

### Recommendation 6

The CYPSP will measure the effectiveness of early intervention at a number of levels;



Track aggregated population level trends. This work has begun, and a framework is already in place. What is required in order to fully develop outcomes measurement for Early Intervention is a refinement of population based level 2 indicators.

Gather and evaluate existing research on how to influence each of the outcomes

Carry out a baseline audit of the quality of early intervention programmes in place in Northern Ireland

Review the progress of the RCT based programmes in Northern Ireland

Develop and pilot a standardized resilience based framework for evaluation of Early Intervention programmes across Northern Ireland

Develop an Evaluation Framework to measure the added value of local integration of services (Family Support Hubs)

APPENDIX A: CYPSP Position Paper – Can Northern Ireland be designated an Early Intervention Region?

1. How are best outcomes for children achieved? – Lessons from Developed Countries.

1.1 The debate about the future direction and priorities of UK policy in relation to children and young people is defined by two themes which have been well rehearsed historically, but which have been re-invigorated by recent developments - on the one hand by public anxiety about the state's ability to guarantee the safety of all children (in the wake of the tragedy of Baby Peter Connolly), and on the other hand by renewed emphasis, based on research evidence, of the importance of enhancing early childhood experience in order to redress the effects of disadvantage and to positively influence longer term outcomes. Recent events in England in relation to young people's involvement in public disturbance have raised the political profile of this debate, and are likely to result in changes in UK Government social policy. It is unclear at this point in time whether this debate will focus on criminalization or on the promotion of well-being.

1.2 This paper's development of the theme of early intervention will be built on the assertion that services for children should be

designed and delivered along a continuum of need,

integrated in planning and delivery,

committed to safeguarding at all levels, and

based on the principle of building on the strengths of children, young people and families,

based on children's rights as well as addressing their needs.

1.3 The paper has been written from a Children's Rights perspective as set out in Article 18 of the United Nations Convention on the Rights of the Child (UNCRC), which specifically refers to the responsibility of the state to provide appropriate assistance to parents, carers and families in the performance of their child rearing responsibilities. The realization of the rights enshrined in the articles of UNCRC – for example the emphasis on the importance of growing up in a happy and loving family environment, on the right to an adequate standard of living, to protection from violence and exploitation, to the highest attainable standard of health care, to equitable access to educational opportunity, and on the right to be heard (UNICEF 2007 p7) - is evidenced in enhanced outcomes for children and young people. The emphasis on the UNCRC and on outcomes related to rights provide the framework which enables the position in the UK, and in Northern Ireland, to be viewed in an international context.

1.4 In 2007 UNICEF published a comprehensive overview Report of child well-being in developed countries (UNICEF 2007, Child Poverty in Perspective), which provides a comprehensive assessment of the lives and well-being of children and young people in 21 nations of the industrialized world. This report measures and compares child well-being under six different headings or dimensions, which draw on 40 separate indicators relevant to children's lives and rights;

material well being (poverty)

health and safety

education

peer and family relationships

behaviour and risks

young peoples own subjective sense of well-being

1.5 The framework developed in this report is guided by the articles of the UNCRC. The Report lists countries in order of their average rank for each of the six dimensions (See Appendix 2). It concludes that;

The overall table of child well-being is headed by the Netherlands

European countries dominate the top half of the overall league table, with Northern European countries (Netherlands, Sweden, Denmark, Finland) claiming the top four places

All countries have weaknesses that need to be addressed, and no country features in the top third of the rankings for all six dimensions

The United Kingdom and the United States are in the bottom third of the rankings for five of the six dimensions reviewed, and are at the bottom of the overall ranking

No single dimension of well-being stands as a reliable proxy for child well-being as a whole

There is no obvious relationship between levels of child well-being and GDP per capita

1.6 The majority of the countries listed in the top third of the UNICEF outcomes table have child welfare systems which are based on the principles of comprehensive

universal provision, a high level of integration of services and emphasis on early years. Such systems are made possible through state provision funded by taxation regimes which are high relative to the UK, as well as a political consensus about the value of investment in children and young people as integral to the social, political and economic well-being of society. The debate about taxation and investment priority lies outside the immediate scope of this paper, which is to facilitate an Early Intervention plan by co-ordinating existing resources. However the Partnership may also consider that it wishes to include lobbying government for structural changes as part of its overall plan. The first key implication of the UNICEF study for the UK (and its regions) is the imperative to maximize all available resources in order to move in the direction of accessible and universally available services in order to improve outcomes. The second key implication is that integrating services, particularly in relation to early intervention, improves outcomes.

## 2 Early Intervention – Key Messages

2.1 There have recently been several major national reports in the UK, coming from different policy directions (Breaking the Cycle of Disadvantage, Improving Early Learning, Safeguarding) which have come to similar conclusions about the importance of Early Intervention. There is a broad consensus that early intervention is critical in order to address disadvantage. This position is based on considerable evidence of the negative impact of neglect on the developing brain and on the conclusions of major studies such as the ACE study that adverse childhood experiences have a profound, proportionate and long lasting effect on well-being. The extensive literature base is referenced and summarized in the Allen Report (2010)

This section of the paper will consider some of the key themes referenced, under the headings of;

Why Early Intervention?

What is Early Intervention?

How can Early Intervention be measured?

Early Intervention Delivery Models.

Why Early Intervention?

2.2 Two major Reports commissioned by the UK Government in relation to Early Intervention have been compiled by Graham Allen MP. The Allen Report (2010) – jointly written by the Centre for Social Justice and the Smith Institute, which refers to a need to address what has been termed as ‘broken Britain’, identifies a number of contextual themes ;

The scale of social breakdown in Britain. The report suggests that too many communities are characterised by underachievement, lost potential and wasted lives. The report holds that it is clear that policies of late intervention have failed and the alternative must be tried.

The size of what the report terms the ‘dysfunctional base’ (i.e. those facing severe disadvantage) is increasing – this has huge social and economic costs for society (p21). Building human capabilities is as important as improving economic or educational outcomes – this is a generational problem, which will take a generation to fix (p24)

There is evidence that ill health and dysfunction strongly correlate with adverse experiences in early life (ACE Study) – the report holds that dysfunction expands exponentially in relation to the number of different types of adverse early experience (p23)

The report holds that 1 in 8 children are growing up in ‘risk’ environments in the UK (p25) – thresholds for social work intervention mean that such services do not reach a substantial number of these families

Research evidence of very poor outcomes for Looked After children who have been taken into the care of the state – there is a disproportionate level dysfunction which ‘they are likely to perpetuate and which can have a significant impact on future generations’ (p26)

There is a ‘disconnect’ between agencies involved in early years (0 -10), and those involved in the subsequent years (10 -18)

There is a need to ensure that children are ‘school ready’- a child’s development score at 22 months can serve as an accurate predictor of educational outcomes at 22 years (Millennium Cohort study)

The report suggests that society needs to address trends such as the rise in violent crime (particularly young males), drug and alcohol use by young people (p35 -36), educational under-achievements of children from disadvantaged backgrounds, reduction in marriage rates, increase in teenage pregnancy, absent fathers

The report describes dysfunctional families as ‘incubators for the generational transfer of mental and physical ill health and chaotic life styles...’

There is a need to address the growth in prescribing for mental health states of children (Perry) – there is evidence of a rise across child onset depression, personality disorders, psychosis, addictions, substance misuse, violence, anger disorders, eating disorders (p39)

The impact of unresolved trauma on later mental health (Perry, ACE study) (p39) requires to be factored in, as does the relationship between addictions, poor health outcomes and early childhood experiences (Perry)

2.3 The Munro Report on Safeguarding and Child Protection in the UK (2011) contends that the arguments for Early Intervention are threefold (C5);

there is a 'moral' argument for minimizing adverse experiences for children and young people. Evidence demonstrates how deficiencies in early years experience can have a significant impact on development in later life, and that we have more ability to prevent or resolve maltreatment at an early stage, than when serious abuse or neglect has occurred (MacMillan et al 2009). The State has duties under Article 19 of the UNCRC to prevent the abuse or neglect of children and young people, as well as to deal with its incidence. Responsibility for the primary prevention of violence (i.e. all forms of harm) against children and young people lies with Health, Education, Social Work, Police and other services

there is a 'now or never' argument, based on the evidence of the enduring damage done to babies by unresponsive and neglectful adults. This draws on evidence of the importance of secure attachment, and on lessons from neuroscience (The Royal Society 2011)

there is a growing body of evidence to support the cost effectiveness of early intervention (Allen 2010, Knapp Parsonage and McDaid DOH 2011)

2.4 A further emphatic case for early intervention is made in the UNICEF Report (2010) entitled 'The Children Left Behind'. This report states that the case is strong in principle and in practice. For a child to suffer avoidable setbacks in the most vulnerable years is an avoidable breach of Article 6 the UN CRC – that every child has the right to develop to his or her potential. Allowing a child to fall unnecessarily behind brings in its wake a long list of practical costs and consequences, which include low birthweight, parental stress, chronic stress to the child, food insecurity and inadequate nutrition, poor health outcomes (obesity, diabetes, chronic asthma, anaemia, cardiovascular disease etc), more frequent use of hospitals and emergency wards, impaired cognitive development, lower educational achievement, lower rates of return on investment in education, reduced linguistic ability, lower skills and aspirations, lower productivity and adult earnings, unemployment and welfare dependency, behavioural difficulties, involvement with police and courts, teenage pregnancy, alcohol and drug dependency. The report emphasises that the children who fall behind do so at the earliest stage of their lives, and that the central practical message is 'the earlier the intervention.... the greater the leverage'

2.5 A central theme of the Allen Report (2010) is the need to focus on those who will raise the next generation of children. The report makes reference to studies which have demonstrated the predictability of dysfunctional outcomes in early childhood – the Farrington and West Cambridge Study which found that adult offending could be predicted in childhood, and the Dunedin study into outcomes for 'at risk' children. It states that Early Intervention by definition breaks the intergenerational cycle – the initial challenge is to locate the area where payback will be most effective. Evidence of the importance of neurological development in the first three years of life (WAVE

Trust) strongly suggests that an investment fulcrum lies in primary prevention focused on 'at risk' groups under the age of three (p47). Early attunement and empathy are key elements of healthy attachment (p61). The overall approach has two strands;

- a) 0-3 year olds need to receive the stimulus and responsiveness they need to flourish
- b) all youngsters (0 -18) need to receive the knowledge and support that they require in order to be good parents.

2.6 Both the 2010 and 2011 Allen Reports are emphatic about the strong economic benefits of early intervention, arguing that intervening later is more costly, and that the rate of return on remedial, rehabilitative and reactive treatments decline as children get older, and entrenched behaviours become harder, if not impossible, to correct (Allen 2011, p2). The reports illustrate the financial costs to society of failure to pre-empt dysfunction – referring, for example to evidence of the enhanced cost to public services of children with untreated behavioural problems, involved in youth crime, placed in secure Children's Homes, disengaged from education, employment or training, or in need of treatment to address mental health problems etc. UNICEF (2010) points to the costs associated with increased strain on health and hospital services, remedial schooling, welfare and social protection programmes, police and courts, reduced economic productivity, and of children failing to develop their full potential.

2.7 The Field Review (2010) – cited by Munro - looked specifically at Child Poverty and life chances for those born into disadvantaged circumstances. Parenting is identified as a key factor, and it concludes that early interventions are essential to enable children to overcome disadvantage and to achieve better outcomes. In a similar vein the Tickell Review (2010) of the Early Years Foundation Stage notes the importance of providing support for children who are already experiencing developmental delay or behavioural problems.

2.8 The Munro Report notes that certain features of family life are associated with adverse outcomes for children and young people, which include the impact of factors such as parental mental ill health, alcohol/substance abuse, domestic violence, and living in poverty. However the Report notes that many children and young people affected by these conditions nonetheless thrive. It is noted by the Social Care Institute for Excellence (SCIE 2008) that research shows that there is still much to be learnt about the outcomes produced from the influence and interaction of individual risk factors across children's lives. A recent major article in the 'Observer' (11.09.11, p28) reports conflicting academic opinion on the over-riding importance of parental connection in the early years. This article reports views from the field of neuroscience that learning and cognitive development occurs throughout childhood and beyond, and that children (and adults) have been 'hardwired' for life-long learning (Breuer 1999). SCIE notes that gaining indications of vulnerability from the intersection of risk factors is complex, and that there is evidence that 'clustering' of risk factors is not always a sound indicator. Contextual circumstances do not make poor outcomes inevitable, and there is an emerging body of research on the importance of coping factors, protective strategies and children's resilience.



(Pinkerton and Dolan 2007; Place Reynolds Cousins O'Neill 2002; Walsh 2002; Fraser Richman Galinsky 1999; Ungar 2006).

2.9 The concept of resilience has had a major impact on thinking about the role of the family in recent years. It has been developed in psychology (Masten and Powell 2003), in relation to children in need (Gilligan 2003), in the arena of youth justice (Rutter et al 1998), and in the field of education, in work on academic resilience (Martin and Marsh 2007). In summary, resilience theory recognizes that all families function in a manner characterized by ebb and flow; that all families have strengths and weaknesses; that all families go through different stages as children develop; that children and families, in the majority of instances, can cope with episodes of adversity. It notes that families draw upon a range of resources – many of which may be informal - in order to address difficult issues and overcome them. More recently this understanding of resilience has been developed to take account of the ecological and cultural context. The Resilience Research Centre in Canada (Ungar 2009) has pointed out that, understood this way, resilience is more likely to occur when services and resources are provided which can enable every child to do well in ways that are meaningful to his or her family and community. Building resilience is inextricably linked to local culturally accessible services.

What is Early Intervention?

2.10 The Social Care Institute for Excellence (2008) has noted that definitions of Early Intervention are contested, and that the term 'early' can take on several meanings;

chronologically early

early in relation to the development of problem behaviours

early in relation to the likelihood that available interventions might be successful

SCIE have proposed that a useful definition is where 'early' is taken to reference the point in time at which a child or young person becomes vulnerable to poor developmental outcomes

2.11 The Allen Report (2010) argues that it is essential to identify what works best among a broad range of schemes and programmes, and calls for the identification of 'blueprints' based on the best tried and tested schemes. It recommends a National Assessment Centre for Early Intervention, to stimulate and drive a wide Early Intervention strategy. The Report argues that it has identified a small number of programmes (which fulfil most 'standard' criteria and score highly on delivery), which can be regarded as foundational elements of an Early Intervention Strategy. Some of these are specific programmes, others are referred to generically and are planks of current government policy. The overall approach is that, whilst the 0-3 age group is the primary target for Early Intervention, there needs to be emphasis on ensuring that 0-18 year olds are 'child ready'. Hence the Report recommends a 'virtuous circle of interventions' (Allen 2010 p74);



a pre-natal package ; HVs, Midwives to be retasked to be as active on the emotional aspects of maternal development as on physical and nutritional aspects; First Steps in Parenting programme

post natal programmes (Family Nurse Partnership); intensive HV input to 'at risk' families; rigorously tested in the USA

Sure Start Programmes and Children's Centres; One stop Shop for families in disadvantaged areas, offering access to a range of services

Primary School programmes; to ensure that all children are 'school ready' -parenting support, language, numeracy literacy programmes, social competency programmes (including waiting a year to start school); SEAL (Social and Emotional Aspects of Learning);

anti-drug and alcohol programmes; giving every 11 year old an effective drug and alcohol course;

secondary school pre-parenting skilling programmes (p74); Secondary school SEAL programmes

2.12 The Munro Report (2011) describes a number of characteristics and examples of Early Intervention.

policies to fund universal programmes and activities to all children young people and families ((e.g. Early Intervention Grant), as well as specialist services where intensive support is needed

the Child Poverty strategy (Tackling the causes of disadvantage and transforming families lives), and the Social Mobility strategy (Opening Doors, Breaking Barriers)

the commitment to double the number of places on the Family Nurse Partnership programme

the development of the Sure Start programmes in local communities to enable services to be offered in good time to prevent difficulties

a framework for governance/management of volunteers

redesign of services locally to co-ordinate and provide programmes for families with multiple problems (including community budgets) (p76)

local and shared arrangements to identify and record the early help needed by children, young people and families – it is the provision of an 'early help' offer, where needs do not meet the threshold for children's social care services, which will continue to matter and make the most difference to them (p78)

the development of assessment processes (involving all partners) to address the problem of when to escalate the level of professional involvement where there are safeguarding concerns (e.g. multi-agency Safeguarding Hubs)

2.13 The OFMDFM Strategy for Children and Young People in Northern Ireland (2006-2016) is also underpinned by a commitment to prevention and early intervention. The strategy states that this should not be construed solely as the need for intervention at a point which prevents a problem worsening or a situation developing further. The aim (OFMDFM 2006, p 18-19) ' is to improve the quality of life, life chances and living for all our children and young people, and reduce the likelihood of more serious problems developing in the future.... We will achieve this, in the main, through the provision of quality universal services at all stages of a child or young person's life. In effecting a shift to preventative or early intervention practice, it is important that we do not lose sight of, or take attention away from, those children and young people who are most in need..... we must ensure that universal and preventative approaches are supported by targeted and proportionate responses for children who need them most'. The OFMDFM pledge in relation to early intervention is to ' promote a move to prevention and early intervention practice without taking attention away from our children and young people currently most in need of more targeted services'

2.14 It can be seen from the above that early intervention is a wide concept that needs to encompass existing universal programmes as well as the networks of locally accessible culturally appropriate supports and services which have developed, using diverse routes, to address a wide range of needs. The Centre for Excellence and Outcomes for Children and Young People (CE04) defines Early Intervention as 'intervening early and as soon as possible to tackle problems emerging for children, young people and their families or with a population at risk of developing problems. Early intervention may occur at any point in a child's life' (Grasping the Nettle' Report 2009). It is proposed that the CYPSP adopt this definition.

How can Early Intervention be measured?

2.15 The information gathered for the Family Support Data base in Northern Ireland (accessible at [www.familysupportni.gov.uk](http://www.familysupportni.gov.uk) ) indicates a wide variety of programmes and agencies which provide Early Intervention. However, there has been no systematic attempt to achieve a consensus to what constitutes an evidence base in relation the quality of the provision across Northern Ireland. The publication of the Family Support Database provides an opportunity to develop a baseline audit of sources of information about what has worked.

2.16 In relation to tracking whether services improve outcomes for whole populations of children, as opposed to groups of children who use specific services, one approach developed by CEO4 in England involves an accountability framework for Children's Centres, or groups of Children's Centres, based on tracking population trends grouped under high level outcomes. The model works through the concept of 'turning the curve' i.e. through the tracking of such population based indicators and providing services which affect such indicators positively. This is very similar to the approach to outcomes measurement developed to date in Northern Ireland, and now endorsed by the CYPSP, which has been based on tracking high level outcomes on a whole population basis and utilizing a range of agreed indicators for each outcome. The indicators measure the contribution of different agencies, but critically require inter-agency co-operation in order to maximize impact. The data can be

disaggregated in order to track outcomes for groups of children and young people with additional needs (e.g. Looked After children, Children with disabilities etc), who require more intensive inter-agency co-ordination than children and young people in the wider population. This model has been influenced by the work of Hogan and Murphey (2000) and on Friedman (2005) in the USA, which has demonstrated the relationship between a highly co-ordinated inter-agency outcomes based programme, an inherent emphasis on prevention, improved outcomes and associated cost savings. In Northern Ireland the approach has been mandated by OFMDFM to track progress towards the six high level outcomes which are at the heart of the 'Our Children and Young People – Our Pledge' strategy (2006), and the evolving range of indicators include Children's Rights indicators. The work of the CYPSP planning groups, including the sub-regional Outcomes Groups and Locality Groups, as well as the Northern Ireland wide sub groups of the CYPSP which focus on groups of children and young people with additional needs or circumstances, is based on this model. The model has been published in an Outcomes Planning 'tool kit', together with a literature survey (CAWT, 2008).

2.17 In contrast to the Hogan and Friedman models, which address the need for improved outcomes at whole population level, the Allen Report advocates a more targeted approach. At the centre of the first Allen Report (2010) is the assertion that a number of core services in an Early Intervention Strategy should replicate those that have been rigorously tested, using randomised control trial designs. These are described as 'blueprint' programmes and examples include the Family Nurse Partnership programme (University of Colorado USA) which is a preventative programme for vulnerable, young first time mothers. It is currently being piloted throughout the UK (including Northern Ireland), and early evaluation suggests that it can be delivered successfully (Lancet 373; 250-266); the Roots of Empathy programme for Primary School children (University of British Columbia, Canada) – implemented in Canada, USA, New Zealand and Australia; the Triple P Parenting programme (University of Queensland, Australia), which is applied to targeted localities and offers a range of clinically tested programmes to parents designed to improve parenting interventions to address conduct problems in children. (Sanders M, Markie Dodds C, Tully L, Bor W 2000). The second Allen Report (July 2011, C1;34, p8) has established a list of the best programmes evidenced in this way in order to ensure that confidence from investors is retained, and calls for such programmes to be implemented with fidelity to the original design of their originators.

2.18 In relation to evidence based policy and practice, which are highly valued, it is acknowledged that the dominant view at present of what evidence is reliable gives greatest weight to random control trials (RCTs). There is, however, an ongoing and long standing debate about the use of RCTs as the gold standard for evaluation, and questions about cultural appropriateness and about programme fidelity across different contexts have been raised (Dolan and Featherstone 2010). It has been argued that children's lives, and the communities in which they live, develop in different societal and cultural contexts. The backdrop of available services, as well as cultural attributions given to factors such as expectations and behaviour, may differ significantly. In this view, the contention that interventions designed and tested in one society can be effectively transferred to another society is problematic. Cartwright and Munro (2010) observe that a properly conducted RCT, to quote "provides evidence that intervention works somewhere (i.e. in the trial). The decision

maker, however, needs to estimate 'will it work for us?' The underlying social and physical structures in which an intervention is devised cannot automatically be assumed to be comparable to target localities in causally different aspects (assuming we know what these are). Differences in institutional, psychological and physical factors yield different causal and probabilistic relations. Sweden and the US, for example, have radically different ways of conceptualizing and responding to anti-social behaviour among young people..." (Cartwright and Munro 2010, Sect 8). Fundamental differences in levels and type of welfare state provision exist across national boundaries, which provide very different backdrops to particular programs, which cannot be screened out as variables in evaluation. The second Allen Report (July 2011, C4;20 p38), whilst on the one hand insisting on the importance of programme fidelity in relation to core evidence tested programmes, also states that the introduction of a number of early intervention programmes that are currently delivered outside the UK would require 'to be developed according to a UK context, reflecting different social and cultural norms'.

2.19 There is considerable emphasis in the second Allen Report (2011) on the creation of a 'Social Market' infrastructure to support the necessary investment in targeted Early Intervention programmes – such proposals include outcome based contracting, stimulation of a Social Investment market, the creation of an Early Intervention Fund, Early Intervention bonds etc. Allen identifies inherent difficulties in implementing a Social Market approach. In addressing the issue of measurement of return on investment in targeted programmes, the Report acknowledges a number of difficulties;

length of time between intervention and desired outcome – how to calculate investment time frames

how to isolate/identify the outcomes which have a positive effect on the inter-generational cycle (examples provided are derived from RTC programmes)

definition of target populations ( how to avoid data manipulation – 'creaming i.e. selecting families with the aptitude for a particular programme, or 'parking' i.e. selecting out families who present the biggest challenges)

establishing a causal link between intervention and outcomes

how to evaluate the cash value of an outcome

how to factor in unmet need – particularly in relation to achievement of savings targets in the short/medium term

how to manage differential levels of investment risk for different cohorts of children/ young people

2.20 In contrast to the emphasis in the Allen Report on developing systems to track outcome data in order to adhere to RCT programme fidelity in relation to targeted groups of children and young people, the Munro Report (2011p 6) refers to ' the undue importance given to performance indicators and targets which provide only part of the picture of practice, and which have skewed attention to process over the

quality and effectiveness of help given'. It goes on to recommend the revision of core statutory guidance in relation to Children in Need and their families in order to remove constraints imposed on front line staff as a consequence of excessive regulation, including national performance indicators. Constraints which have been imposed by prescribing or endorsing particular approaches, in the view of the report, have inhibited the quality of relationship building, innovation, professional judgement and assessment of need necessary to facilitate better safeguarding practice (Munro 2011, Recommendation 1)

2.21 The foundation Atlantic Philanthropies has provided significant support for children's services in the Republic of Ireland and Northern Ireland over the past decade, leading to investment in evidence based intervention models derived from other countries – for example, the Big Brothers Big Sisters Mentoring from the USA (a one to one adult to child friendship programme), or the 'Incredible Years' programme (aimed at parents, children and teachers), both of which are framed within rigorous high quality evaluations, including randomized control trial research studies. Reflecting on a tension between what have been described as 'blueprint' models and subjective practice based models of intervention, it has been argued

(Canavan, Coen, Dolan, Whyte 2009) that such approaches, based on highly prescribed structures and process, have the potential to negate relationship based working, good questioning in the interests of the child, and understanding of individualized nuances of need. There are also significant limitations to subjective practice which is not informed by external evidence. What is required, in the real interest of working together for outcomes for children and families facing adversity is a balanced perspective capable of reflecting critically on quantitative and qualitative data and analysis.

2.22 Looking at the body of literature on resilience, Bruner (2006) argues that the measurement of resilience - which is the measurement of opportunities to build and use relationships, to develop informal support networks, to seek supports which are unique to each individual or family – has to rely heavily on user self measurement.. This position is reinforced by the International Resilience Project's emphasis on sensitivity to local constructions of health and well-being, and to local contexts. It is argued by the International Resilience Project (2009) that studies of resilience have insufficiently accounted for cultural specificity in their findings ; that existing work on developmental assets, such as the Search study, has ignored the possibility that certain assets may be more or less important in different contexts, or even that there might be other assets that have not been included; that studies have seldom constructed measures to test for the prevalence of health indicators of relevance to specific populations under stress; that it is not acceptable to treat culture as an independent variable that can be controlled for rather than fully understood; and that there is need for greater cultural relativism in studies of resilience, requiring methodological innovation. If the value and impact of preventative family support, including Early Intervention, is to build resilience, and if resilience is unique to each situation, then the evidence of improved resilience has to come from the people who use the service. This is the basis for an existing piece of work already recognized by the CYPSP Research Process- which is to develop a standardized user evidence evaluation framework to measure the impact of level one and level two Family Support services in Northern Ireland.



2.23 The issue of standards of evidence in relation to Early Intervention in work with children and families has been further addressed by Canavan (2010), with reference to the different frameworks which exist to help both consumers and producers of research. He has referred to the categorization of study types which has in effect privileged systematic reviews and random controlled trials, placing qualitative research at the bottom of the list. A recent contribution by Veerman and Van Ypren (2007) suggests another approach to providing evidence in relation to early interventions with children and young people which holds that the application of randomised controlled trials may not always be required for an intervention to be justified in practice or policy. This approach is inclusive of a mix of research methods – descriptive, theoretical, indicative and causal - which provide different levels of validation of effectiveness, and which has the advantage of incorporating user experience and reflecting cultural context. The requirements of Article 12 of the UNCRC in relation to participation and the voice of the child are particularly relevant in this debate. Canavan has adapted the Veerman and Van Ypren work into a research framework which can incorporate good descriptive accounts, connect with the literature and theory building, and can then engage in various rigorous types of research to establish intervention value.

2.24 The second Allen Report (July 2011 C1;31. p7) in fact acknowledges that there are a great number of early intervention programmes that are not support by rigorous standards of evidence, and argues for the need to continually work to improve the evidence base. The Report says that this does not mean that such programmes are ineffective, particularly where they are informed by evidence from research and are still working to develop their own definitive evaluation.

2.25 It is proposed that the Partnership adopt the following incremental approach to gathering evidence at a number of levels;

Develop the Outcomes Framework to track aggregated population level trends. This is already in place, but requires more robust inter-agency support This Framework is rights based and compatible with the UNICEF approach.

Gather and evaluate existing research on how to influence each of the outcomes

Carry out a baseline audit of evidence of what Early Intervention has worked throughout Northern Ireland

Review the progress of the RCT based programmes as applied in the Northern Ireland context

Develop and pilot a resilience based framework for evaluation of Early Intervention programmes across Northern Ireland .

Early Intervention - Delivery

2 26 The Reports referred to in this paper do not provide any definitive recommendations about the ‘shape’ of an Early Intervention Delivery model. What are described below are some emerging examples and principles from these Reports.

2.27 The Allen Report (2010) presents two practical examples of co-ordinated Early Intervention programmes – in Greater Littleton, Colorado and in Nottingham.

Greater Littleton City Council is the major funder for the Greater Littleton Youth Initiative, which is a large community collaboration. It has developed, over 8 years, a package of six 'blueprint' programmes;

Nurse / Family Partnership

Incredible Years Parenting programme

Big Brothers/Big Sister of America mentoring programme

Life Skills Training

Functional Family Therapy – a therapeutic programme for 'at risk' youth

'Bully – proofing Your School' – a bullying prevention programme

This initiative is described as a work in progress (p103)

Nottingham Early Intervention City – 'One Nottingham'. Leadership of this initiative came from the Local Strategy Partnership, pulling together partners from police, health, schools, business and the voluntary sector. Plan based on concept of the 'virtuous' circle for 0-18 yr olds

CHILD READY

Pre natal for all single mothers/Mothercare Pregnancy services

Post natal ; Intensive Health Visits for all single mothers, Family Nurse Partnership

SCHOOL READY

Creating the Attendance Habit

Children of Prolific Offenders Supported

Sure-start

Incredible Years or Triple P

Primary SEAL ; Emotional Competence for all Primary Children

Roots of Empathy

LIFE READY

Drug Education for 11 yr olds;



Alcohol Education for 11 yr olds

Big Brother – Big Sister Mentoring

Witnessing Domestic Violence Health Alliance Project

Secondary SEAL for all teenagers;

All 16 yr old mums properly housed

First Steps in Parenting

2.28 The Allen Report (2011) sets out the following principles for a national policy to interrupt the current dysfunctional cycle;

Political leadership and effective planning and co-ordination at official level

Early Intervention is less expensive and more effective than late interventions – all political parties need to commit resources to Early Intervention in the Comprehensive Spending Review

The creation of an Early Intervention Foundation nationally to maintain momentum, challenge the evidence base, support programmes, co-ordinate the investment programme etc

Localism will be the primary enabler and commissioner - local agencies need to be mandated nationally to break out of 'silo' thinking - there needs to be the right balance between local independence and a national framework

Outcome based contracting based on improving data

Creation of a market in Social Finance - Need to incentivise investment in this area

2.29 The Allen Report (2010 C5 p112) refers to the duty and privilege of achieving success as resting with parents or primary care givers. It states that only parents can deliver, and that children and young people, as future parents, need to be seen as sources for the solution. There is very little reference to the importance of the views, experiences, input of parents, care givers, children or young people in any other part of the two Allen Reports. The Munro Report (2011), which is entitled a 'A child centred system' refers to the centrality of forming relationships with children and families and recommends an inspection framework for children's services which is capable of examining the child's journey, and exploring how the rights, wishes, feelings and experiences of children and young people inform and shape the provision of services (Munro 2011, Recommendation 4.11). It is a contention of this paper that a delivery mechanism for Early Intervention needs to fully reflect the Art 12 of the UNCRC in relation to participation.

2.30 The Munro Report highlights the importance of multi-agency working to implement an Early Intervention agenda. One of the formal recommendations of the Report is that Government should place a duty on Local Authorities and Statutory Partners to ensure the sufficient provision of early local help services for children, young people and families – to include

Specifying the range of professional help available to local children, young people and families through statutory, voluntary and community services

local Strategic Needs Analysis;

Specifying how they will identify how they will identify children who are suffering, or are likely to suffer, significant harm, and arrangements for managing safeguarding at the front-line of universal services;

local resourcing for early help;

design and manage the provision of an 'early help' offer where needs do not meet statutory children's social care criteria.

2.31 The CE04 'Grasping the Nettle' Report (2009) notes that key characteristics of effective integrated working that need to be in place everywhere include having a shared vision, clear understanding of needs and identification of gaps, sharp focus on improving outcomes, clear and consistent messages communicated to staff and families, and an underpinning workforce development strategy.

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#### APPENDIX 1 – CONSTITUENT AGENCIES OF THE CYPSP

STATUTORY SECTOR	
Agency	Agreed representative
Health and Social Care Board	CHAIR: John Compton, Chief Executive  Fionnuala McAndrew, Director Social Care and Children  Tony Rodgers, Assistant Director of Social Care and Children
Public Health Agency	Dr Eddie Rooney, Chief Executive  Carolyn Harper, Executive Medical Director/Director of Public Health  Mary Hinds, Director of Nursing and Allied Health Professionals
Education and Library Boards	TBC, BELB  Tony Murphy, Chief Executive, SELB  Barry Mulholland, Chief Executive, WELB  Shane McCurdy, Chief Executive, NEELB  Stanton Sloan, Chief Executive, SEELB.  Clare Mangan, Head of Children & Young People’s Services (SELB & WELB)
Council for Catholic Maintained Schools	Jim Clarke, Deputy CEO

Belfast Health and Social Care Trust	Colm Donaghy, CEO
Northern Health and Social Care Trust	Sean Donaghy, CEO
Southern Health and Social Care Trust	Mairead McAlinden, CEO
South Eastern Health and Social Care Trust	Hugh McCaughey, CEO
Western Health and Social Care Trust	Elaine Way, CEO
Northern Ireland Housing Executive	John McPeake, CEO
Youth Justice Agency	Paula Jack, CEO
Probation Board for Northern Ireland	Brian McCaughey, Director of Probation
Police Service of Northern Ireland	Place available for Assistant Chief Constable, Criminal Justice
Local Government, through SOLACE representatives	Liam Hannaway, CEO, Banbridge District Council and Vice Chair of CYPSP  Theresa Donaldson, CEO, Craigavon Borough Council  Anne Donaghy, CEO, Ballymena Borough Council  Geraldine McGahey, CEO, Larne Borough Council
Department of Justice	Declan McGeown, Head of Community Safety Unit
Department of Social Development	Michael Daly, Director of Urban Regeneration Strategy

VOLUNTARY SECTOR	
Agency	Agreed representative
Children in Northern Ireland	Pauline Leeson, Director
Action for Children NI	Dawn Shaw, Operational Director Children's Services

Barnardo's NI	Lynda Wilson, Director
Include Youth	Koulla Yiasouma, Director
Mencap	Maureen Piggot, Director
Parents Advice Centre	Pip Jaffa, Director

COMMUNITY SECTOR	
Agency	Agreed representative
Clan Mor Sure Start	Tina Gregory, Coordinator
South Tyrone Empowerment Programme	Bernadette McAliskey, CEO (STEP Coordinator)
Carrickfergus YMCA	Robert Loade, General Secretary
Women's Aid Federation NI	Annie Campbell, Director
ARC Health Living Centre	Jenny Irvine, Chief Executive Officer
Blackie River Community Group	Jim Girvan, Chief Executive

BME SECTOR	
Agency	Agreed representative
Chinese Welfare Association	Eileen Chan-Hu, Director
Wah Hep Chinese Community Association	Paul Yam, Director
Bryson Charitable Organisation	Jo Marley, Director
Vacant – migrant or Traveller community	

## APPENDIX 2

### What is Already in Place To Deliver an Early Intervention Strategy – VOLUNTARY AND COMMUNITY SECTOR



In terms of its capacity to deliver an Early Intervention strategy, Northern Ireland has one significant advantage over other UK regions, and that is the potential to integrate the resources of its statutory agencies and highly developed and locally grounded Voluntary and Community sectors.

It has been estimated by NICVA that Northern Ireland has some 4,500 voluntary and community organizations (NICVA 2011) across the region. These sectors employ some 29,000 people, and a much larger number of people are involved in a voluntary capacity. In 2010 the Northern Ireland Audit Office Report entitled 'Creating Effective Partnerships between Government and the Voluntary and Community Sector' noted that the voluntary and community sectors make "a significant contribution to the achievement of the Executive's strategic goals and priorities". This key position is recognized in the 2011 election manifestos of all of the main political parties.

It has been argued (Morrison 2001) that the voluntary and community sectors in Northern Ireland have historically performed a different and wider role than their counter-parts in other regions of the UK, ranging through service provision to a more engaged policy development role. He notes the estimation from a previous Secretary of State that the sector in Northern Ireland may be 25% larger than in other parts of the UK. His paper argues that the system of Direct Rule, which continued for more than 25 years during the period of the Troubles, allowed the Voluntary and Community sector to develop to address what has been referred to as a democratic deficit, to act as "an alternative site of politics and as an alternative opposition". From the late 1980s onwards this role was further enhanced through the political fall-out from the Anglo-Irish agreement (which provided an opportunity for community and voluntary sector strategists to influence government); through its central role in the establishment of structures to address urban and rural disadvantage (e.g. Making Belfast Work 1987, The Londonderry Initiative 1989, the rural development programme of the 1990s etc) and through the Government strategy for the Support of the Voluntary Sector and for Community Development in 1993. Morrison also draws attention to the extent to which European institutions and structures afforded the voluntary sector opportunities to bypass domestic government institutions and to engage in politics on different terms – examples would be the roles of NGOs in pursuing Human Rights and Children's Rights agendas. The role of the Community sector in the District Partnerships established by the European Special Support Programme for Peace and Reconciliation, and subsequently in the formation of Local Strategy Partnerships to implement the second Peace and Reconciliation Programme, are further examples of how successful it had become in enmeshing itself in governance at all levels.

Both the Community sector and the Children's Voluntary sector have been involved in the planning and provision of front line services. Much of this activity is focused on the area of prevention and early intervention – on services at levels 1 and 2 of the Northern Ireland (Hardiker) Family Support Model (Appendix 3). Voluntary sector and Community sector agencies have been prominently involved in the development of strategic partnerships with statutory agencies which provide services for children and young people (Health and Social Care Trusts and Boards, The Education and Library Boards, the Youth Justice Agency, the PSNI etc) since the early 1990s in order to co-ordinate service planning and provision for services for children and

young people – examples include multi-agency Children’s Services Planning, Child Care Partnerships and Area Child Protection Committees – all of which have promoted a culture of joint ownership of planning. The development of services which are locally accessible has been a priority area, and this has led to the piloting of local Family Support Hubs (see C4, P 10).

The community sector as a whole has tended to be more closely associated with the agenda of development and regeneration of local communities, and with the growth and stimulation of the Social Economy, linking with the statutory agencies concerned with training, employment, housing, environment, rurality etc, and building stronger links with District Councils, more recently through Local Strategy Partnerships. It has, however, contributed to the child focused partnerships listed above through a range of activities concerning children and young people.

Critically, local community organizations have provided, over decades in some instances, community supports to children and families through voluntary effort and through the usage of diverse funding streams. One very public example of funding which has been taken up in this way is BBC Children in Need funding, which is only provided to agencies which can demonstrate that their work benefits children in relation to needs which are additional to socio-economic need. Small community groups in Northern Ireland have benefited from this type of funding to a significantly greater degree than in any other region of the UK. Due to these differences between the sector in Northern Ireland and in other UK regions, this sector in Northern Ireland has been able to develop an infrastructure and to have a much higher profile in relation to early intervention.

The agenda which is common to both the Voluntary and Community sectors, and which has the potential to bring together the considerable experience and resources of both strands at a strategic level, is that of building the social capital of local communities through activities to promote enhanced outcomes for children and young people through early intervention. Stronger families result in stronger communities. The explicit concept of Early Intervention Areas is currently being piloted in Derry City Council area and in the Colin Area Partnership in Belfast.

Early intervention approaches for local areas have been developed over a number of years through Children's Services Planning locality planning processes, now mandated by the CYPSP. Early Intervention approaches have also been developed through other integrated planning processes such as Investing for Health Partnerships, Neighbourhood Renewal Partnerships and Community Safety Partnerships. The Community and Voluntary sectors have been engaged throughout all such arrangements, often providing the local ‘glue’ which binds arrangements at ground level together.

The co-ordination of Early Intervention in Northern Ireland will be greatly facilitated by the recent publication of a comprehensive data base and website which maps Family Support services at local and regional levels across Northern Ireland, and which provides full profile details of each service.

A number of partnerships have been formed across Northern Ireland to address children and young people's needs. However, none of these have addressed all levels and types of need. The CYPSP now brings together all the statutory agencies which are required to provide supports and services for children and young people, and representatives of the strong and vibrant Community and Voluntary sectors . This has created, for the first time, a coalition with a specific focus on all children and young people across Northern Ireland –combining the mandate and position power of statutory agencies with the collective understanding of the Community and Voluntary sectors of grass roots life.

### APPENDIX 3

What is Already in Place To Deliver an Early Intervention Strategy – STATUTORY SECTOR

TO BE DRAFTED

#### APPENDIX 4 - UNICEF REPORT CARD (2007)

		Dimension 1	Dimension 2	Dimension 3	Dimension 4	Dimension 5	Dimension 6
Dimensions Of Child Well-being	Average Ranking Position (all six Dimensions)	Material Well-being	Health and Safety	Educational Well-being	Family and Peer Relationships	Behaviours And Risks	Subjective Well-being
Netherlands	4.2	10	2	6	3	3	1
Sweden	5.0	1	1	5	15	1	7
Denmark	7.2	4	4	8	9	6	12
Finland	7.5	3	3	4	17	7	11
Spain	8.0	12	6	15	8	5	2
Switzerland	8.3	5	9	14	4	12	6
Norway	8.7	2	8	11	10	13	8
Italy	10.0	14	5	20	1	10	10
Ireland	10.2	19	19	7	7	4	5
Belgium	10.7	7	16	1	5	19	16
Germany	11.2	13	11	10	13	11	9
Canada	11.8	6	13	2	18	17	15
Greece	11.8	15	18	16	11	8	3
Poland	12.3	21	15	3	14	2	19
Czech Rep	12.5	11	10	9	19	9	17
France	13.0	9	7	18	12	14	18
Portugal	13.7	16	14	21	2	15	14
Austria	13.8	8	20	19	16	16	4
Hungary	14.5	20	17	13	6	18	13
United States	18.0	17	21	12	20	20	-
U.K.	18.2	18	12	17	21	21	20

#### APPENDIX 5; N.I FAMILY SUPPORT MODEL

In Northern Ireland services have been analysed using a planning model is based on the work of Pauline Hardiker and colleagues (Hardiker, Exton, & Barker, 1991). The Hardiker model is recognised throughout the United Kingdom and internationally as a robust and flexible tool for planning services to meet children's needs. It is used to capture the services/supports provided by any sector (e.g. by families, community, voluntary and statutory sector agencies, both locally and regionally). This model, which has become known as the Northern Ireland Family Support Model, has been applied to the population of children and young people in Northern Ireland.

The four-tier approach demonstrates what needs to be done at each level and shows the interdependency between the levels:-

Level 1 represents services provided to the whole population to provide mainstream health care, education etc. It also includes services based on universal rights for the whole population, and services designed to improve the situation of disadvantaged people through community development.

Level 2 represents support for children who are vulnerable, through an assessment of need. Services are targeted to individual children, with parental support, and are provided in statutory and voluntary settings. It incorporates services that must address rights such as Article 23, UNCRC, on the right of disabled children to special

Level 3 represents support to families, or individual children and young people, where there are chronic or serious problems. It is provided through a complex mix of services, which need to work together well in order to provide the best support. These services must address UNCRC special measures of protection such as Article 39, on the duty to provide for recovery for victims of neglect, exploitation or abuse.

Level 4 represents support to families, or individual children and young people, where the family has broken down temporarily or permanently, and the child or young person may be looked after by social services, in youth custody or prison or as an in-patient, for instance due to disability or mental health problems. These services must address rights such as article 40, UNCRC, which sets out the rights of children accused of offences.

It is important to stress the degree to which the Hardiker model emphasises the interdependence between the four levels. Strong and effective services for all children at Level 1 will alleviate the need for Level 2 services for many children. A good and comprehensive range of preventative services at Level 2 will address difficulties early enough to affect the numbers of children and young people who require services at Level 3. Focused and intensive services at Level 3, which can draw on the strengths of family and neighbourhoods, will impact on the numbers of children who are at risk of having to leave home.

The range of Early Intervention services in Northern Ireland can be framed within Levels 1 and 2 of this model

## APPENDIX 6; FAMILY SUPPORT HUBS

In parallel with its work on developing an understanding of Early Intervention, the CYPSP has endorsed work, which is taking place currently, to pilot improved co-ordination at local level through the development of a network of Family Support Hubs. The term 'hub' has been used, in a loose sense, to convey a commonly held view that there needs to be better local co-ordination of Family Support services. The objective of a hub is to enhance awareness, accessibility, co-ordination and provision of family support resources in local areas, with an emphasis on prevention and early intervention. Some of the key characteristics have been identified as ;

coalitions of agencies which provide early intervention services locally

points of contact locally for information about family support

points of local and non-stigmatized access to family support services

points of co-ordination for locality assessment of need and for local action planning

A 'hub' can be thought of as an easily recognizable non stigmatized 'brand' or flagship for family support at local level. The starting point is recognition that each locality has unique characteristics in respect of geography, demographics, socio-economic structure, community organization, local political configuration, informal networks and service history. All of these characteristics will influence the development of a locality hub. There is no single hub model which can be superimposed on any area. However, literature from international best practice has enabled the development of a framework for measuring the impact of, and for quality assuring, local delivery structures for Early Intervention. This approach is based on the work of Pinkerton, Dolan and Canavan (2006), who argue that agencies which practice Family Support need to evolve in the direction of ten core characteristics;

Working in partnership (with children, families, professionals and communities)

Needs led interventions (strive for minimum intervention required)

Clear focus on the wishes, feelings, safety and well-being of children

Reflect a strengths based perspective which is mindful of resilience

Promotes the view that effective interventions are those that strengthen informal support networks

Accessible and flexible in respect of location, timing, setting and changing needs, and can incorporate both child protection and out of home care

Families are encouraged to self-refer and multi-access referral paths will be facilitated

Involvement of service users and providers in the planning, delivery and evaluation of family support services is promoted on an ongoing basis

Services aim to promote social inclusion, addressing issues around ethnicity, disability, and rural/urban communities

Measures of success are routinely built into provision so as to facilitate intervention based on attention to the outcomes for service users to facilitate quality assurance and best practice

These ten defining principles provide an audit framework for assessing agencies

(or coalitions of agencies) which set up to provide family Support services. In effect they define the ethos, operational principles and the key characteristics, of Family Support provision.

The CYPSP has mandated each of its Outcomes Groups to oversee the development of Family Support Hubs in its area.



## Children's Law Centre

Response to the Northern Ireland Executive's consultation on the Draft Programme for Government 2011 - 2015

Children's Law Centre  
February 2012

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### Introduction

The Children's Law Centre is an independent charitable organisation established in September 1997 which works towards a society where all children can participate, are valued, have their rights respected and guaranteed without discrimination and every child can achieve their full potential.

We offer training and research on children's rights, we make submissions on law, policy and practice affecting children and young people and we run an advice/ information/ representation service. We have a dedicated free phone advice line for children and young people and their parents called CHALKY and a youth advisory group called Youth@clc.

Our organisation is founded on the principles enshrined in The United Nations Convention on the Rights of the Child, in particular:

Children shall not be discriminated against and shall have equal access to protection.

All decisions taken which affect children's lives should be taken in the child's best interests.

Children have the right to have their voices heard in all matters concerning them.

From its perspective as an organisation, which works with and on behalf of children, both directly and indirectly, the Children's Law Centre is grateful for the opportunity to make this submission to the Northern Ireland Executive and to offer assistance and comment on the Draft Programme for Government for the period of 2011 - 2015.

Consultation and Section 75 of the Northern Ireland Act 1998

We are pleased to note the current consultation exercise which is taking place on the Draft Programme for Government 2011 - 2015. While we appreciate the challenge of the proper application of the section 75 of the Northern Ireland Act 1998 statutory duty we believe that we must stress that this duty does apply to the Draft Programme for Government and all Departmental policies submitted as part of this process and must be adequately complied with in a way which ensures full compliance with section 75 of the Northern Ireland Act 1998 at a high strategic policy level.

We note and are supportive of the commitment at the outset in the Draft Programme for Government to equality issues and the elimination of all forms of inequality and unfairness and the recognition of the need to proactively promote equality of opportunity and inclusion in society. The Draft Programme for Government states that,

*"Equality is an important issue for the Executive and society alike. Inequalities do exist and we will work hard to eliminate these. Our policies and programmes will be designed in ways that ensure we can address inequality and unfairness and create conditions that support inclusion and equality of opportunity."*<sup>7</sup>

The Draft Programme for Government goes on to state,

*"As a practical expression of this commitment, we have undertaken a strategic Equality Impact Assessment (EQIA) on this Programme for Government. The EQIA has also been issued for public consultation. Upon completion of the consultation, the EQIA will be finalised and used to inform the delivery, and where necessary, any review of this Programme for Government."*<sup>8</sup>

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<sup>7</sup> Page 11, Draft Programme for Government 2011-2015

<sup>8</sup> Page 11, Draft Programme for Government 2011-2015

We have a number of concerns about the production of the Equality Impact Assessment (EQIA) of the Programme for Government 2011 – 2015 after the publication of the Programme for Government 2011 – 2015 for consultation. We received a letter informing us of the consultation on the EQIA of the Programme for Government 2011 – 2015 on the 13<sup>th</sup> January 2012 to run for a period of 12 weeks but requesting responses for the consultation to be received by the 22<sup>nd</sup> February 2012. The reason given would suggest that if a response to the EQIA is to have any impact it must be received by 22<sup>nd</sup> February 2012. This allows just over 5 weeks for the consultation exercise which falls far short of the equality obligations which the Northern Ireland Executive is bound by under section 75 of the Northern Ireland Act 1998. We are therefore unclear about the potential for responses to the EQIA which are received within the timeframe of the consultation on the EQIA, but after the five week consultation period ending on the 22<sup>nd</sup> February 2012, to inform the delivery or any review of the Programme for Government. We wish to receive assurances from the Programme for Government Team that responses to the EQIA of the Programme for Government 2011 – 2015 received after the 22<sup>nd</sup> February 2012 will be considered, taken cognisance of and will inform the development of the final Programme for Government 2011 – 2015.

The Children's Law Centre believes that the legislating of Section 75 of the Northern Ireland Act 1998 is perhaps the most significant development in the promotion of equality of opportunity for children in recent years. The CLC has been working and continues to work towards the effective implementation of section 75 of the Northern Ireland Act 1998 to ensure the promotion of equality of opportunity for all vulnerable groups of children and young people protected by the legislation, which is such a central component to our peace settlement in this jurisdiction. We are therefore extremely concerned with regard to the Northern Ireland Executive's non-compliance with section 75 of the Northern Ireland Act 1998 as a result of the extremely restricted timeframe for its consultation period on the EQIA of the Programme for Government as stated above. The CLC believes that the Executive is also in breach of its common law duty to consult. The Equality Commission's, "*Guidance for Implementing Section 75 of the Northern Ireland Act 1998*,"<sup>9</sup> has recently been updated to recommend an increase in the minimum consultation period from 8 weeks to 12 weeks in line with best practice. As indicated above, the consultation on the EQIA of the Programme for Government was issued for consultation with a de facto five week timeframe for individuals and organisations to make a submission. The CLC believes that this is significant breach of the Northern Ireland Executive's section 75 duties, is fundamentally flawed and severely undermines any commitment of the Executive to equality of opportunity or section 75 of the Northern Ireland Act 1998.

It is wholly inadequate to allow just over five weeks for respondents to make a submission to the consultation on the EQIA of the Programme for Government in terms of compliance with section 75 and the common law duty to consult. CLC would have hoped to be facilitated to make a comprehensive and constructive response to this consultation but due to the restricted time frame our ability to do so has been significantly compromised. We are very concerned as to the good faith and sincerity with which this consultation process has been undertaken by Government and

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<sup>9</sup> April 2010

consequently dubious about the potential to influence the final document or any of the policy decisions contained therein.

It is well acknowledged that the intention of section 75 is to mainstream equality, making it central to policy decision making. In order for an equality perspective to be central to policy making it needs to be incorporated in all policies at all levels and stages. This would involve incorporation of the principles of equality of opportunity from the beginning of this process and throughout the development and implementation of the policy for future impact assessment by Government of all high level strategic policy development. Given the fact that the Northern Ireland Executive has made its budget allocations for the 2011 – 2015 period a year ago, without any reference to or consideration of the Programme for Government and has been taking forward policies and projects in the intervening timeframe it would also appear that this EQIA is of limited value as the policy decisions linked to and flowing from the Budget have been taken prior to proper consideration of the impact on equality of opportunity. This has the impact of totally undermining the section 75 process as the findings of the equality impact assessment cannot contribute to the decision making process. If policy decisions are made and adverse impact is identified after decisions are made, the scope for mitigation and alternatives are nil as decisions have already been taken without regard to the equality obligations.

We would also be grateful if you would provide us by return with details of how you have or intend to consult directly with children and young people as one of the groups likely to be impacted upon most by the implementation of the Executive's Programme for Government proposals. Children and young people comprise one third of the population in Northern Ireland and are service users of all of the services which will be impacted upon by the Programme for Government proposals, including education, health, youth services, housing, social services and many more. Given the likely impact that the Programme for Government proposals will have on the lives of children and young people, direct consultation with this group will be central to ensuring this large group of vulnerable citizens are consulted in respect of the Programme for Government. Such consultation is essential not only in ensuring compliance with section 75, but also in ensuring the Government's compliance with Article 12 of the UNCRC, one of the principles of the UNCRC - Respect for the views of the Child. In examining the government's compliance with Article 12, the UNCRC Committee recommended that the government,

*"...take further steps to promote, facilitate and monitor systematic, meaningful and effective participation of all groups of children in society."*<sup>10</sup>

The UN Committee on the Rights of the Child is clear that children and young people as rights holders, with their own views and concerns, should be actively engaged and involved in budget processes. The Committee has made specific comment on implementation of Article 12 of the UNCRC. The Committee in considering the participation of children and other stakeholders,

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<sup>10</sup> Para 30 CRC/C/15/Add.188

*“...underlines the importance of ensuring that the process of allocation of resources be as participatory as possible and that children and their parents are involved from the outset in the development, implementation and monitoring of the budget process”*<sup>11</sup>

The Committee also,

*“...urges States Parties to promote child participation in the budget process, through, inter alia, allowing parents, teachers, caregivers and children themselves to participate in budgetary decisions and requests that the Committee is informed of the results achieved through the participatory process.”*<sup>12</sup>

Also, the Equality Commission’s, *“Guidance for Implementing Section 75 of the Northern Ireland Act 1998”*<sup>13</sup> states that consultation should take place in accordance with its stated Guiding Principles on Consultation,

*“...specific consideration is given to how best to communicate information to children and young people...”*<sup>14</sup>

We are extremely disappointed to again have to request, following our initial request in a letter to the Programme for Government Team on the 18<sup>th</sup> January 2012, copies of the child accessible version of the Programme for Government consultation document and the Northern Ireland Executive’s consultation on the EQIA of the Programme for Government. We have not still received this documentation, nor have we received any details of the system which will be used to analyse responses to both of these consultation processes including the degree of weight which will be attributed to both individual and organisational responses despite requesting this information in writing also. We would reiterate our request for this information at this juncture and ask what additional time is being made available and measures are being taken to ensure the full and meaningful participation of children and young people in the consultation process given the failure by the Northern Ireland Executive to produce child accessible versions of the Programme for Government or EQIA of the Programme for Government consultation documents to date.

We wish to alert you to concerns highlighted by the Equality Commission for Northern Ireland’s in its response to the Northern Ireland Executive’s Budget 2011 – 2015 which are of relevance to this consultation exercise also. In its response to the Northern Ireland Executive’s Budget 2011 – 2015 the Commission highlighted its previous advices to the Northern Ireland Executive, indicating that an Equality Impact Assessment on the Budget proposals should take place simultaneously and as early as possible. The Commission states that this was repeatedly made clear to the Northern Ireland Executive since 2007, yet again its advices failed to be complied with, despite the Commission repeatedly giving advice to the Northern Ireland

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<sup>11</sup> Para 35 DAY OF GENERAL DISCUSSION ON “RESOURCES FOR THE RIGHTS OF THE CHILD – RESPONSIBILITY OF STATES” October 2007

<sup>12</sup> Ibid Para 36

<sup>13</sup> April 2010

<sup>14</sup> Chapter 7

Executive on compliance with its statutory obligations under section 75 of the Northern Ireland Act 1998, in line with the Commission's Equality Commission's power to give advice to public authorities, as per Schedule 9 (1) (b) of the Northern Ireland Act 1998. The Commission's response to the Executive's Budget states,

*"In correspondence with the Office of the First Minister and deputy First Minister in 2008 the Commission wrote: 'The Commission expects that the development of the policies in future will incorporate an equality assessment simultaneous and at the earliest possible stage to ensure that consideration of equality issues will be integral to the consultation process at the outset and, therefore, to the development of the policies'<sup>15</sup>.*

This followed advice given in relation to the last Comprehensive Spending Review. In the covering letter (December 2007) to its response to the consultation on *Building a Better Future*<sup>16</sup> the Commission referred to,

*"...concerns which we will take up separately about the absence of an accompanying equality impact assessment of the draft Programme for Government and draft Budget. This represents a serious omission and will mean that responses will not adequately reflect equality concerns."*

In the later response to the equality impact assessment<sup>17</sup> the Commission wrote,

*"...the development of an EQIA of the draft PfG/Budget/ISNI simultaneous to policy and budgetary development process would have.....allowed for a public debate that was better informed about equality aspects and therefore led to a more detailed and high quality consideration of these. The failure to do so represents a lost opportunity to embed equality aspects effectively in the development and finalisation of the draft PfG/Budget/ISNI. Further, the recent review of effectiveness of Section 75 highlighted the need for the EQIA to be applied as a positive tool to aid the policy development process and that an EQIA carried out after the development of the policy was not only inefficient in terms of time but ineffective when policy makers are reticent to make changes at a later stage. This calls into question the credibility of the process and Government commitment to addressing inequalities. The Commission expects that the development of the policies in future will incorporate an equality assessment simultaneous and at the earliest possible stage to ensure that consideration of equality issues will be integral to the consultation process at the outset and, therefore, to the development of the policies."<sup>18</sup>*

The Commission's response when assessing the Northern Ireland Executive's compliance with its statutory obligations under section 75 and the Equality Commission's Guidance states that,

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<sup>15</sup> Letter to John McMillen, OFMdFM, 7 May 2008

<sup>16</sup> Building a Better Future: draft Programme for Government 2008-2011, draft Budget 2008-2011, PSA Framework 2008-2011 and Investment Strategy 2008-2018, Northern Ireland Executive 2008

<sup>17</sup> Equality Commission for Northern Ireland response to: Building a Better Future – draft Equality Impact Assessment carried out at Strategic Level, May 2008

<sup>18</sup> Paras 23 – 25, EC/11/1/2



*“The information presented to date does not conform to the Commission’s advice in relation to an overall EQIA of the Budget, as there is as yet no EQIA, in a way that will allow for issues to be taken into account in final decisions. The information from all the Departments presents the Commission with further questions about how equality scheme commitments have been fulfilled, particularly around the processes for screening, the information presented does not conform with Commission guidance on an EQIA, but also ensuring sufficient time and information for an effective consultation.”<sup>19</sup>*

We urge the Northern Ireland Executive to take full account of this advice and undertake immediate remedial action with regard to the Equality Commission’s earlier concerns and CLC’s concerns as outlined in relation to compliance with section 75 of the Northern Ireland Act 1998 as outlined above. Noting the Equality Commission’s stated concerns we are copying this response to them. We also remind you that, where the Executive or any Government Department does not fully assess the equality impacts of its Budget or spending review, it could be open to legal challenge. For example, in relation to the recent Coalition Government budget, the Home Secretary Theresa May warned that,

*“[i]f there are no processes in place to show that equality issues have been taken into account in relation to particular decisions there is a real risk of successful legal challenges”.*<sup>20</sup>

Recent case law in Great Britain<sup>21</sup> has made clear the willingness of the courts to ensure the proper application of the statutory duties. Indeed, the Court of Appeal has quashed delegated legislation where the equality impact had not been assessed, which it found to be,

*“...a defect in following a procedure that is of very great substantial, and not merely technical, importance”.*<sup>22</sup>

The courts have also underlined the need for advance consideration of the promotion of equality of opportunity<sup>23</sup>. For example, in the Southall Black Sisters case, which involved cuts to funding, the court found that the,

*“...authority was not entitled to formulate policy before any equality impact assessment... [and] it is unlawful to adopt a policy contingent on an assessment.”*<sup>24</sup>

This is based on, *“...the vital principle that the impact of any proposed policy should be assessed and steps to obviate any adverse impact considered before the adoption and implementation of the proposed policy”.*<sup>25</sup>

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<sup>19</sup> Para 39, Paras 23 – 25, EC/11/1/2

<sup>20</sup> Letter to Chancellor of Exchequer of 9 June 2010, reproduced on guardian online website at <http://www.guardian.co.uk/politics/interactive/2010/aug/03/theresa-may-letter-chancellor-cuts>

<sup>21</sup> In relation to s71 Race Relations Act 1976, which requires public authorities to have due regard for the need to promote the equality of opportunity in relation to race.

<sup>22</sup> R(C) v Secretary of State for Justice [2008] EWCA Civ 882, at para 54.

<sup>23</sup> R (Elias) v Secretary of State for Defence [2006] WLR 321, [2006] EWCA Civ 1293

<sup>24</sup> R (Kaur and Shah) v London Borough of Ealing [2008] EWHC 2062, at para 36.

<sup>25</sup> Ibid, at para 20.



We also wish to highlight the recent Judicial Review challenge taken by voluntary groups in London against London Councils' decision to cut its London Borough Grant Scheme by £16.875m (63.5%). Mr Justice Calvert Smith ruled that London Councils' consultation process was flawed and it failed to meet statutory equality duties. Funding cut decisions for 200-plus projects that have been designated into low priority categories have been quashed and London Councils ordered to re-run the process.

Also of relevance is the recent Judicial Review by six Councils to challenge the Education Minister, Michael Gove's, decision to withdraw funding to part of England's school building programme<sup>26</sup>. Mr Justice Holman, allowed the challenges by the councils, declaring that Mr Gove had unlawfully failed to consult them before imposing the cuts. In five of the six council cases, the failure was,

*"...so unfair as to amount to an abuse of power",* said the judge.<sup>27</sup>

He also said that,

*"However pressing the economic problems, there was no overriding public interest which precluded consultation or justifies the lack of any consultation."*<sup>28</sup>

Mr Gove's decision-making process was also unlawful because of his failure to discharge relevant statutory equality duties<sup>29</sup>.

These judgements underpin the need for full and proper adherence to statutory equality duties and to the common law duty to consult, including adequate time for full public consultation and engagement, particularly with affected groups and individuals to ensure that proper consideration is given to how potential adverse impact for equality categories can be effectively mitigated. We wish to reiterate the need for compliance with section 75 of the Northern Ireland Act 1998 and for the Executive to take action immediately to address its failings in this Programme for Government process to date.

## International Standards

The UNCRC is a set of non-negotiable and legally binding minimum standards and obligations in respect of all aspects of children's lives which the Government has ratified. The UK Government as a signatory to the UNCRC is obliged to deliver all of the rights contained within the Convention for children and young people. We note the reference to the United Nations Convention on the Rights of the Child in the Statement to the Northern Ireland Assembly by the First and Deputy First Minister on the Programme for Government and Investment Strategy for Northern Ireland<sup>30</sup>. In informing the Assembly and the general public about the commitments contained within the Draft Programme for Government, the Deputy First Minister states that within the Programme for Government there are commitments to,

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<sup>26</sup> [2011] EWHC 217

<sup>27</sup> Para 96

<sup>28</sup> Para 96

<sup>29</sup> Para 116

<sup>30</sup> 17<sup>th</sup> November 2011

*“fulfil our obligations under the UN Convention on the Rights of the Child;”*<sup>31</sup>

While this is a very welcome statement, we are extremely disappointed that upon examination of the Programme for Government we have been unable to identify any such commitment. Indeed, there appears to be no reference whatsoever to the fulfilment of the Government’s obligations under the United Nations Convention on the Rights of the Child within the Draft Programme for Government 2011 – 2015 which significantly undermines the Government’s commitment to the UNCRC and its delivery within the lifetime of this Programme for Government. This is particularly disappointing when one considers that the next examination of the UK and the Northern Ireland Governments for compliance with its obligations under the UNCRC is scheduled to take place within the lifetime of this Programme for Government, in 2014. We note the sole reference to the UNCRC within the Programme for Government as one of the many, “building blocks” listed with a view to the achievement of Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health and wellbeing.<sup>32</sup> It is the view of the CLC that the UNCRC and the Government’s commitments to children and young people in Northern Ireland as a result of its ratification of the UNCRC is much more significant than amounting merely to a building block which will support the priorities outlined in the Programme for Government. As stated above, the UNCRC are a set of legally binding minimum standards and obligations which the Government has committed to and which should be central in are informing and guiding the Northern Ireland Executive’s priorities over the next three years for children and young people. It is the opinion of the CLC that the Programme for Government for Northern Ireland 2011 – 2015 should explicitly state the Northern Ireland Executive’s commitment to fulfilling its obligations under the UNCRC, including the incorporation of the UNCRC and its commitment to addressing all of the outstanding recommendations of the Committee on the Rights of the Child from its previous Concluding Observations following its examinations of the UK Government’s compliance with the UNCRC in 1995, 2002 and 2008, prior to the next examination of the Government’s compliance in 2014. We would be very supportive of the inclusion of a clear commitment by the Northern Ireland Executive within the Programme for Government which delivers on the Deputy First Minister’s statement and indicates a clear commitment to children and young people through the fulfilment of the Government’s obligations under the UNCRC.

The principles of the UNCRC are all relevant in a discussion of the obligations of Government to children and young people and its priorities over the next three years as outlined in the Programme for Government for. The Government needs to ensure the rights of all children not to be discriminated against (Article 2), have their best interests are upheld (Article 3), that they survive and develop to the maximum extent possible (Article 6) and they are able to meaningfully participate in all aspects of their lives (Article 12). As a minimum, these core principles of the UNCRC should be referenced in the Draft Programme for Government and should underpin the Programme for Government, acting as a framework for decisions with regard to the priorities for Government for children and young people. Given the importance of the UNCRC and the Government’s commitment to children’s rights through ratification of

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<sup>31</sup> Page 9, Statement to the Northern Ireland Assembly by the First and Deputy First minister on the Programme for Government and Investment Strategy for Northern Ireland 17<sup>th</sup> November 2011

<sup>32</sup> Page 35, Draft Programme for Government 2011 - 2015

the Convention, we would expect to see upholding the rights of children and young people being prioritised within the Programme for Government.

The Programme for Government sets the strategic context for the priorities of the Northern Ireland Executive over the next three years. It is extremely regrettable that the Programme for Government is being consulted on a year later than the Northern Ireland Executive's Budget 2011 – 2015. The Programme for Government should effectively detail where the Government will commit investment over the period of the Programme and where resources will be allocated in line with the Government's priorities. The UNCRC is clear about the obligations on State parties to invest in children and young people and to ensure that children and young people remain a central priority for Governments in policy making. Article 4 of the UNCRC states that,

*“States Parties shall undertake all appropriate legislative, administrative, and other measures for the implementation of the rights recognized in the present Convention. With regard to economic, social and cultural rights, States Parties shall undertake such measures to the maximum extent of their available resources and, where needed, within the framework of international co-operation.”*

The UN Committee on the Rights of the Child, following its examination of the UK Government in 2008 recommended that,

*“...the State party, in accordance with article 4 of the Convention, allocate the maximum extent of available resources for the implementation of children's rights, with a special focus on eradicating poverty and reduce inequalities across all jurisdictions.”<sup>33</sup>*

The Committee also highlighted the need to invest in children by Governments, stating that investment in children is a,

*“...widely accepted best guarantee for achieving equitable and sustainable human development and a fundamental requirement for social and economic priorities of any government”<sup>34</sup>*

The Committee went onto recommend that the Government,

*“a) make children a priority in the budgetary allocations as a means to ensure the highest return of the limited available resources; and make investment in children visible in the State budget through detailed compilation of the resources allocated to them;*

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<sup>33</sup> Para 19, CRC/C/GBR/CO/4 October 2008

<sup>34</sup> CRC (2007) Day of General Discussion “Resources for the rights of the child – Responsibility of States”

b) *consider using rights-based budget monitoring and analysis, as well as child impact assessments on how investments in any sector may serve “the best interests of the child”*<sup>35</sup>

Thomas Hammarberg, Council of Europe Commissioner for Human Rights, has commented on the obligations under Article 4 of the UNCRC and the Committee’s Concluding Observation with regard to Article 4 in light of austerity budgets and the impact that they will have on children living in poverty. He has highlighted the obligations on the Government to prioritise services for children and young people within Government by virtue of the UNCRC, stating that,

*“Budgets which reduce the underpinning of the school and health care systems are ill-advised and would only plant the seeds of more serious problems in the future. They also constitute a breach of the pledge made to children in the UN Convention on the Rights of the Child – that we should allocate the maximum extent of our available resources to children and their rights.”*<sup>36</sup>

The UNCRC Committee has also highlighted the need for Government’s to monitor the spend on children and young people and carry out budgetary analysis and child rights impact assessment in an attempt to identify resource allocation to children and the effective implementation of policies and legislation which will impact on children and young people. The Committee’s Concluding Observations state,

*“The Committee notes with appreciation the increase in expenditures on children in recent years. Nevertheless, the Committee is concerned that the increases are not sufficient to eradicate poverty and tackle inequalities and that the lack of consistent budgetary analysis and child rights impact assessment makes it difficult to identify how much expenditure is allocated to children across the State party and whether this serves to effectively implement policies and legislation affecting them.”*<sup>37</sup>

The Committee also recommends that,

*“Child rights impact assessment should be regularly conducted to evaluate how the allocation of budget is proportionate to the realization of policy developments and the implementation of legislation.”*<sup>38</sup>

In addition, to comply with the UNCRC Committee’s Guidelines on Periodic Reports the Government, in its next report to the Committee in 2014 will be obliged to provide information regarding:

The proportion of the budget devoted to social expenditures for children, including health, welfare and education, at the central, regional and local levels;

Arrangements for budgetary analysis enabling the amount and proportion spent on children to be clearly identified. The steps taken to ensure that all competent

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<sup>35</sup> Ibid Para 30

<sup>36</sup> [http://commissioner.cws.coe.int/tiki-view\\_blog\\_post.php?postId=110](http://commissioner.cws.coe.int/tiki-view_blog_post.php?postId=110)

<sup>37</sup> Para 18, CRC/C/GBR/CO/4 October 2008

<sup>38</sup> Para 19, CRC/C/GBR/CO/4 October 2008

national, regional and local authorities are guided by the best interests of the child in their budgetary decisions and evaluate the priority given to children in their policy making; and,

The measures taken to ensure that children, particularly those belonging to the most disadvantaged groups, are protected against the adverse effects of economic policies, including the reduction of budgetary allocation in the social sector.<sup>39</sup>

We do not believe that the necessary prioritisation of children and young people has been carried out within the Programme for Government 2011 – 2015. We urge the Northern Ireland Executive to revisit the Programme for Government with a view to prioritising children and young people in central Government policy making in an effort to protect the most fundamental rights of children and young people. This is of particular importance given the fact that we are now in a period of massive Government public spending cuts across all Government Departments which are already impacting and will continue to impact heavily on the provision of public services for children and young people over the next three years. The funding cuts which Government Departments are imposing are likely to have even graver consequences for the current lack of availability of and access to vital services for very vulnerable children and young people in communities. It is the CLC's experience that funding cuts are already impacting hardest on some of our most vulnerable children, most of whom have additional needs and require additional health and educational support. The continued and perhaps exacerbated failure to address and meet the needs of these children and uphold their rights will have catastrophic consequences for the lives of those children and young people and their communities. It is fundamental that the needs of vulnerable and marginalised children and young people are identified and met through adequate service provision at the earliest possible stage in line with the Northern Ireland Executive's obligations under the UNCRC. The CLC believes that the Government must prioritise children and in particular, very vulnerable and marginalised children within the Programme for Government 2011 – 2015 and invest heavily in early intervention and prevention services for vulnerable children and young people to uphold their rights and realise the Government's obligations under the UNCRC.

## General Comments

The CLC believes that it is extremely regrettable that the Draft Programme for Government 2011 – 2015 is being consulted on a year later than the Northern Ireland Executive's Budget 2011 – 2015 given that the Programme for Government should set the strategic context for decisions taken within the Budget process. The NI Direct website states the purpose of the Programme for Government which,

*"...highlights the key goals and actions the Executive will take to drive forward the priority areas. It includes a detailed Public Service Agreement Framework which sets out the actions and targets departments will take in support of the Executive's priorities."*<sup>40</sup>

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<sup>39</sup> CRC/C/58 para 20

<sup>40</sup> <http://www.northernireland.gov.uk/index/programme-for-government-and-budget-v1.htm>



In its response to the Draft Budget 2011-2015 the CLC raised its concerns about the lack of strategic direction and policy priorities due to the failure to produce and consult on the Programme for Government at the same time as the Draft Budget. The CLC felt that in making its response to the Draft Budget 2011-2015 there was an expectation to comment on Departmental Spending Plans and investment priorities in a strategic vacuum. It was the CLC's belief that when consulting on the Draft Budget and Departmental Spending Plans as a minimum the Programme for Government and associated PSA's, which outline the Government's priorities and provide a framework for the work of the Government, should have been available to provide a rationale for budget allocations and to provide insight into the Government's priorities. The delay in the production of and consultation on the Programme for Government further highlights the disjointed nature of the Programme for Government and Budget processes and the fragmented and siloed nature of the work of the Government Department's themselves. We are challenged as to how the work of Government Departments has been carried out over the last year in a manner that ensures consistency with the draft Programme for Government and we would echo the sentiments contained within the PWC Overview Report commissioned by NICVA which states that agreeing a Budget before putting in place a new Programme for Government is, "*less than ideal*"<sup>41</sup>. In addition, we would agree that the agreement of a Budget ahead of targets and outcomes for public services is,

*"...a reversal of what ideally should be the sequence of decision making, i.e. agree desirable outcomes and then assign budget lines as necessary."*<sup>42</sup>

It is therefore extremely difficult to provide informed and meaningful comment on the Draft Programme for Government 2011 – 2015 in isolation from the Budget proposals and Departmental Spending Plans and from the EQIA on the Draft Programme for Government which should be an integral part of the consultation process on the Programme for Government itself. We are therefore challenged as to how, given the disparate and disjointed nature of all of these vital documents, the Government can ensure the seamless delivery of its strategic priorities and the consistent application of the Northern Ireland Executive's policy direction. We would firmly recommend that urgent attention is directed toward ensuring that all of these relevant documents are brought together to allow for the development of a consistent, coherent and clear vision which is translated to the public and Government Departments alike.

One additional barrier to the provision of informed comment by consultees on the Draft Programme for Government 2011 – 2015 relates to the failure of the Northern Ireland Executive to include Departmental delivery plans or to outline delivery arrangements as part of the consultation exercise. We note that the consultation document states that the Executive will agree the approach to delivery and detailed guidance will be produced<sup>43</sup>. It is the view of the CLC that the delivery mechanisms for the Programme for Government are a central part of the Programme for Government process and we strongly believe that the delivery arrangements and framework should have been developed and made available for comment at this stage in the consultation process. We look forward to receiving the Departmental

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<sup>41</sup> Page 31 NICVA Overview of the NI Draft Budget 2011-2015

<sup>42</sup> Page 29 NICVA Overview of the NI Draft Budget 2011 - 2015

<sup>43</sup> Annex 1, Page 54, Draft Programme for Government 2011 - 2015

delivery plans and the Northern Ireland Executive's detailed guidance on delivery. We wish to reiterate the importance of the delivery of the Programme for Government and stress the need for the Northern Ireland Executive to consult on its guidance for delivery and for individual Departments to consult on their delivery plans in line with section 75 of the Northern Ireland Act 1998. This will include carrying out a thorough screening process, the carrying out of a comprehensive equality impact assessment and full public consultation, including consultation with children and young people as one of the groups most likely to be impacted upon by the Programme for Government.

Given the delay in the production of the Draft Programme for Government 2011 – 2015, it is extremely disappointing to note the lack of detail contained in the document and the prevalence of very vague commitments, milestones and outputs within the Programme for Government. We have a number of concerns that many of the proposed commitments, milestones and outputs within the document are too high level to measure and as a result will deliver little for children and young people growing up and living in Northern Ireland. In addition, while we appreciate the limits on financial resources at present and the fact that we are living in a period of cuts to public spending we do not believe that many of the targets set are ambitious enough and many appear to be a retrograde step which is not what we would expect to see in the Programme for Government outlining the Northern Ireland Executive's targets for the next three years.

#### Cross Departmental Co-operation

One of CLC's concerns with regard to the Draft Programme for Government 2011 – 2015 relates to the apparent lack of co-ordination and co-operation between Government Departments and agencies. While we welcome the recognition by the First and Deputy First Ministers of *"...the importance of collaboration; ... as well as working more effectively across Government Departments..."*<sup>44</sup> there is very little evidence of partnership working at a cross-Departmental or agency level within the consultation document and there is scant reference to co-operation or collaboration by Government Departments or the pooling of resources on cross-Departmental issues, which is an area of obvious concern within a climate of Government funding cuts and pressure on limited resources. We firmly believe that the need to make best use of finite resources for the population of Northern Ireland and children and young people in particular must provide the Northern Ireland Executive with a critical impetus for prioritising efforts to make cross-Departmental, inter-agency working a priority. We believe that the recognition by the First and Deputy First Minister of the importance of collaboration and working more effectively across Government Departments places a clear onus on Government Departments and agencies to adopt a much more pro-active approach to work more effectively in partnership with each other to deliver tangible outcomes for the public in Northern Ireland and more specifically for children and young people.

Despite this onus on Government Department's to work together to ensure the effective delivery of services for children and young people in Northern Ireland, there is a recognition that cross-Departmental co-operation, collaboration and joined up

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<sup>44</sup> Page 12, Draft Programme for Government 2011 - 2015



working does not operate particularly well in Northern Ireland. The Minister for Justice has recently recognised the failure by Government Departments to work together in a coordinated manner when he stated that,

*“Our overall strategic arrangements for children are fairly weak and not very well coordinated. We need a much stronger focus on a more joined up approach to early intervention. We talk about early intervention but we don't actually join up between different departments terribly well”<sup>45</sup>*

The CLC has consistently expressed its concerns about the lack of co-ordination and co-operation between Government Departments and agencies with regard to work being undertaken on a cross-Departmental basis, particularly with regard to the pooling and sharing of resources, the willingness or otherwise of Government Departments to take the lead on issues relating to children and the achievement of positive outcomes for children and young people as a result of cross-Departmental and agency working. We believe that it is clear that current arrangements to ensure cross-Departmental and inter-agency working are not delivering for the Northern Ireland public or for children and young people. The CLC believes that it is now vital that a statutory mechanism be put in place to ensure greater and more effective cross-Departmental co-operation, collaboration and joined up working. We wish to see the imposition of a much clearer obligation on Government Departments and agencies to work together in the interests of meeting the needs of the ‘whole child’ in a holistic way which has the best interests of the child as the paramount consideration in the delivery of services for all children and young people in Northern Ireland. We do not believe that the knowledge that the need for cross-Departmental and interagency collaboration and co-operation is in any way new, which emphasises the difficulties which currently exist with regard to Government Departments working together. The CLC believes that there is a lack of co-ordination and co-operation on a cross-Departmental and Agency basis due to the fact that many Government Departments are unwilling to work together and to share resources.

The onus on the Government to work together and to pool resources is an area which the CLC has consistently raised as one requiring urgent legislative enactment. We believe that it is only through placing a statutory duty on Government Departments and agencies to co-operate that the necessary level of co-operation and collaborative working on a cross-Departmental basis can be achieved. We believe that through the introduction of a statutory duty on Government Departments to co-operate will go some way to best meeting the needs of children as early as possible in their lives in a way which ensures the best use of public money. Research commissioned by the Northern Ireland Commissioner for Children and Young People (NICCY)<sup>46</sup> noted that the problems associated with joined up working at central government level were viewed as the main barrier to effective government delivery for children. The research concluded that there is a need within Government for a statutory duty to co-operate at both central government and inter-agency levels.

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<sup>45</sup> Minister’s Address to Include Youth Conference, *“Getting the Right Youth Justice...engaging with the findings of the review of the Youth Justice System in Northern Ireland”* 27<sup>th</sup> October 2011

<sup>46</sup> Byrne, B. and Lundy, L., *“Barriers to Effective Government Delivery for Children in Northern Ireland”* 2011, NICCY.

The CLC believes that it is only through the introduction of a statutory duty on Government Department's to co-operate that the Government will identify and remove barriers to collaborative working and sharing resources. We believe that any Government Department which fails to operate in this manner should be subject to sanctions in line with the statutory duty. We wish to see this being addressed by the Northern Ireland Executive in the final Programme for Government 2011 - 2015 in the interests of increased Government effectiveness.

### Investment in and Prioritisation of Early Intervention and Prevention

Closely aligned to the need for increased co-operation and collaborative working at central Government level and to best meeting the needs of children as early as possible in their lives in a way which ensures the best use of public money is the need for a clear focus within the Programme for Government on early intervention and prevention. It is now widely accepted that investment in health, education and family support in the early years of children's lives has a significant impact on their future life chances and that moderate investment by Government Departments on early intervention and prevention will circumvent the need for extremely high levels of spending later in a child's life when they have not had their needs met at the most appropriate stage. We believe that there is a clear acknowledgement that investment in early intervention and prevention will secure better outcomes for children and young people and their communities and society and we would have expected to see this being clearly reflected in the Draft Programme for Government 2011 - 2015. We are very disappointed to note the lack of reference in the Programme for Government on the need for investment in early intervention and prevention.

The CLC believes that the needs of children and young people must be met at the earliest possible stage in order for those young people to have their rights upheld and develop to the maximum extent possible in line with the Government's obligations under the UNCRC. One of the CLC's main concerns which it has consistently raised with Government Ministers, MLA's, Assembly Committees and Departmental officials with regard to children's rights relates to the invisibility of children and young people in policy planning at central Government level, including within the Government Budget Allocations and the Programme for Government. The funding cuts which Government Departments are currently imposing over the next few years are likely to have even graver consequences for the current lack of availability of and access to vital services for very vulnerable children and young people in communities.

The CLC is already experiencing firsthand the impact of these cuts on some of our most vulnerable children and young people through a significant increase in the number of calls to our CHALKY helpline in respect of children who have had educational support, allied services, and mental health services either not provided in the first place or withdrawn. The impact of a failure to provide adequate services for children and young people with additional needs in communities and schools will amount to the opposite of early intervention and prevention as it is likely to have the consequence of further marginalising and social excluding children from society, their community and school. One example of the impact on children and young people of the failure by Government to make early intervention and prevention a priority is the relationship between education and children coming into contact with

the criminal justice system. Research has shown that a lack of statutory education was one of the main factors associated with youth offending and re-offending<sup>47</sup>. Low attainment in education, persistent truancy, exclusion and Special Educational Needs are some of the most prevalent risk factors associated with offending behaviour. With a great many services being withdrawn from vulnerable children and young people who require additional support in school as a result of a lack of funding it is clear that many young people will have an experience of education which is entirely irrelevant to them. One can only conclude that this will have a substantially detrimental impact on the numbers of children and young people coming into contact with the criminal justice system which is so costly both economically<sup>48</sup> and in human terms with regard to the lifetime outcomes of children and young people. It is fundamental that the needs of vulnerable and marginalised children and young people are identified and met through adequate service provision at the earliest possible stage in line with the Northern Ireland Executive's obligations under the UNCRC. The CLC believes that the Government must prioritise children and in particular, very vulnerable and marginalised children within the Programme for Government 2011 – 2015 and invest heavily in early intervention and prevention services for vulnerable children and young people to uphold their rights and realise the Government's obligations under the UNCRC.

#### The Children and Young People's Strategy

We are extremely disappointed to note the only reference to the Children and Young People's Strategy within the draft Programme for Government 2011 - 2015 as one of the many, "building blocks" listed with a view to the achievement of Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health and wellbeing.<sup>49</sup> It is the view of the CLC that the Children and Young People's Strategy and the Government's commitments to children and young people in the Strategy are much more significant than amounting merely to a building block which will support one of the Northern Ireland Executive's priorities outlined in the Programme for Government. This is particularly disappointing given the work which is being taken forward by the new Children and Young People's Branch within OFMDFM to develop a new Action Plan to deliver on the commitments made within the Children and Young People's Strategy and the extremely welcome renewed emphasis on children and young people within OFMDFM through the establishment of the Branch and the work it is taking forward. The CLC would be very supportive of a recognition within the Programme for Government of the Children and Young People's Strategy as the over-arching strategic framework under which all services and policy priorities for children and young people in Northern Ireland will be delivered. We wish to see the final Programme for Government being amended to reflect this.

#### Bill of Rights and Incorporation of the UNCRC

We are extremely disappointed to note no reference within the Draft programme for Government 2011 – 2015 to the Bill of Rights despite the fact that that the Bill of

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<sup>47</sup> Youth Justice Board, "A Summary of Risk and Protective Factors Associated with Youth Crime and Effective Interventions to Prevent It", YJB 2005

<sup>48</sup> The current cost of keeping a young person in the JJC is £268,000 based on an average occupancy in 2010/2011 of 27 – Page 17, Announced Inspection of Woodlands JJC (November 2011)

<sup>49</sup> Page 35, Draft Programme for Government 2011 - 2015

Rights is one of the last remaining outstanding issues from the Good Friday Agreement. We are also disappointed to note no reference to the possible incorporation of the UNCRC in Northern Ireland, or at the very least a commitment to carrying out an examination of the work currently being carried out in Wales and Scotland with regard to the implementation of the UNCRC in those jurisdictions.

In Wales, the Welsh Assembly has introduced a legislative measure in The Rights of Children and Young Persons (Wales) Measure 2011 (the Measure) which makes,

*“...provision for and in connection with giving further effect in Wales to the rights and obligations set out in the United Nations Convention on the Rights of the Child.”*

The Measure will come fully into effect on the 1<sup>st</sup> May 2014<sup>50</sup>. From this date there will be a duty on Welsh Ministers to have ‘due regard’ to the requirements of the UNCRC when exercising any of their functions. Welsh Ministers will have to consider the UNCRC and how they could give further or greater effect to the rights and obligations within it when they are making decisions or using their legal powers or duties. In effect this makes the UNCRC part of the decision making framework or process of Welsh Ministers. Welsh Ministers are subject to the due regard duty from the 1<sup>st</sup> May 2012 but only in respect of any provision which is to be included in an enactment, the formulation of a new policy or a review or change to an existing policy.

The Measure is the first and the only general legislative measure of implementation in the UK. It establishes opportunities for accountability through parliamentary, administrative and judicial means. Parliamentary scrutiny is twofold: the Welsh Ministers must make and publish a Scheme to secure compliance with the due regard duty; and, are required to report to the National Assembly for Wales on how they have complied with the Scheme. Administrative scrutiny is as a result of the investigatory and reporting powers of the Children’s Commissioner for Wales which apply to the exercise of functions by the Welsh Ministers, and, from the requirement of consultation with relevant stakeholders when the Scheme is made or revised. Judicial scrutiny is not as strong as under the Human rights Act 1998 as there is no provision for a ‘victim’ of a rights violation to bring a claim, however judicial review is available where a Welsh Minister fail to comply with the due regard duty.

In Scotland the Government is currently carrying out a consultation on the Rights of Children and Young People Bill with the intention of enshrining children’s rights into Scottish law. It is envisaged that this Bill will place a duty on Scottish Ministers to have “due regard” to the UNCRC when taking forward any of their functions. The duty will underpin wide-ranging reform of services for children and young people in Scotland, including through a Children’s Services Bill in 2013 which provides the opportunity to translate the provisions in the Bill into specific powers or duties on either Ministers or public bodies in relation to the delivery of children’s services. The Scottish Government’s consultation document states that, the purpose of the Rights of Children and Young People Bill is to put the UNCRC on a statutory footing. In essence, this involves the introduction of a duty on the Scottish Ministers to have due regard to the UNCRC when exercising any of their functions. It is also clear that

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<sup>50</sup> *Rights of Children and Young persons (Wales) Measure 2011*, s.1(1).

the Scottish Government is not proposing to *incorporate* the UNCRC into Scots law, but rather is proposing to focus solely on the obligations of the Scottish Ministers in respect of the UNCRC as they relate to all of the Scottish Ministers' functions. The development of the Scottish proposals has been informed by the Welsh Measure and the discussions about that Measure during its passage through the National Assembly for Wales. It is proposed that the Scottish legislation will include a duty on the Scottish Ministers to have due regard to the UNCRC and Optional Protocols in the exercise of any of their functions.

The Scottish Government is proposing a "due regard" duty and has stated that this will ensure that, in making a decision, the Scottish Ministers:

identify the relevant rights and duties in the UNCRC and its Optional Protocols;

consider whether alternatives exist which would better promote those rights and duties;

consider whether any aspect of the decision might run counter to those rights and duties; and

make their decision based on a proper assessment of the impacts of all the alternatives, taking account of all the other requirements on them when making decisions.

The Scottish Government is proposing that the duty extends to the exercise of any of the Scottish Ministers' functions. This position reflects the final state of the Welsh Measure after its passage through the National Assembly for Wales. The Scottish Government's consultation paper states that,

*"...devolution in Scotland, where everything is devolved subject to certain reservations, is structurally different to devolution in Wales, where specific powers are devolved one by one. So the effect of a due regard duty across all of the Scottish Ministers' functions is much broader in impact and may give rise to issues which do not apply in Wales."*

For the first time, the Bill will bring the UNCRC formally into the remit of the Scottish courts. When the Bill becomes law in Scotland, any failure by the Scottish Ministers to comply with the duty to have due regard to the UNCRC in exercising their functions may lead to judicial review in the Scottish courts. The Bill will also place a duty on the Scottish Government to report on implementation every five years and to lay a copy of the report before the Scottish Parliament.

Given the focus of the Review of Youth Justice in Northern Ireland with regard to compliance with international standards and best practice, we would have expected the Review Report to recommend the incorporation of the UNCRC or at the very least an examination of work being undertaken in neighbouring jurisdictions relating to the incorporation of the UNCRC. As a minimum, we would have expected to see a critical analysis of the legislative provisions and the proposed legislative provisions in Wales and Scotland and recommendations following this analysis which aims to address any identified or potential deficits of each of the legislative provisions and



build upon the successes and/or the potential of the legislative provisions. This should also include recommendations with regard to the necessary steps which the Northern Ireland Assembly needs to take in order to meet its obligations to implement or incorporate the UNCRC into domestic law and to ensure the best possible legislative framework to give effect to the UNCRC and thereby protect the rights of all children in Northern Ireland.

## Child Poverty

We note and welcome OFMDFM's commitment within the Draft Programme for Government to, "...fulfil our commitments under the Child Poverty Act to reduce child poverty"<sup>51</sup>. We are extremely concerned that given the legislative obligations on the Executive to address child poverty the Draft Programme for Government does not contain more specific and measurable targets for the eradication of child poverty. This is of particular concern given the Northern Ireland Executive's failure to provide any detailed analysis within the Northern Ireland Executive's Budget and Departmental Draft Savings and Spending Plans of its obligations under the Child Poverty Act and Child Poverty Strategy. In addition, we note that the Delivery Report on the previous Programme for Government for 2008 - 11 which considered progress made up to 31<sup>st</sup> March 2011<sup>52</sup>, indicates that targets to eliminate severe child poverty and reduce overall child poverty were not delivered.

Poverty continues to be a defining factor in the lives of many children and their families in Northern Ireland, negatively affecting health and well-being, educational and employment opportunities and access to quality accommodation<sup>53</sup>. According to the most recently published Households Below Average Income (HBAI) statistics in 2009/10, almost one in three (28%) of all children in Northern Ireland lives in poverty (Before Housing Costs) – i.e. over 121,000 children representing an increase of 14,000 children over 2008/09.<sup>54</sup> Northern Ireland was the only part of the UK where the level of child poverty has increased. The figure for the whole of the UK was 20%. Between 2001 and 2004, 13% of Northern Ireland's children lived in persistent severe poverty compared with 5% in Britain<sup>55</sup>. Recent research by Save the Children found that there were 40,000 children living in severe poverty in Northern Ireland in the three years to 2008/09. This means that 9% of children - nearly one in ten children - are living in severe poverty in Northern Ireland<sup>56</sup>.

Benefit levels remain below the poverty line and income levels of lone parent families and couples with children are lower than comparable levels in Britain. Income deprivation is compounded as poor households pay proportionately more in Northern Ireland for essential goods and services such as food, fuel, transport, insurance and banking. People living in the 20% most deprived electoral wards have

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<sup>51</sup> Page 9, Draft Programme for Government 2011 – 2015

<sup>52</sup> Building a Better Future The NI Executive's Programme for Government 2008-2011 Delivery Report on Progress up to 31<sup>st</sup> March 2011

<sup>53</sup> Save the Children, 2007

<sup>54</sup> [http://www.dsdni.gov.uk/ch4\\_children-6.doc](http://www.dsdni.gov.uk/ch4_children-6.doc)

<sup>55</sup> Monteith et al., 2008: 2-3

<sup>56</sup> "Severe Child Poverty in Northern Ireland" Save the Children February 2011

poorer life expectancy, higher rates of admission to hospital, more infant deaths and more suicides than Northern Ireland's population as a whole<sup>57</sup>.

In Northern Ireland in 2005-06 nearly 7000 families with dependent children presented as homeless – this figure has increased 50% over the past ten years.<sup>58</sup> In 2009 only 29.7% of children entitled to free school meals achieved 5 GCSE's grades A\* to C, including English and Maths, compared to 63.6% of non free school meals entitled students.<sup>59</sup> In a UK-wide poll on child poverty one of the questions asked was 'Do you think that ending child poverty should be a high priority or a low priority?' Across the UK 70% of people said that it should be a high priority. In Northern Ireland, 92% said that child poverty should be a high priority for government<sup>60</sup>. The poll also showed a much higher level of debt in Northern Ireland connected to the high cost of bills during winter, with 63% expecting to go into debt (or further into debt) as opposed to a UK average of 28%. Children born to poorer families in the north of Ireland are more likely to be smaller and to die at a higher rate than those born to better off families<sup>61</sup>. In relation to poor housing conditions in 2006, 15% of households with children lived in homes that failed the Decent Homes Standard<sup>62</sup>. In 2009, approximately one in five children (18%) here live in households in which no adult is in employment<sup>63</sup>.

Given the impact that living in poverty has on the lives of children and young people and the enjoyment of their rights, as well as the fact that unemployment in Northern Ireland and in particular youth unemployment is rising and that the Government is considering a range of Welfare Reform proposals which are likely to have an extremely detrimental impact on child poverty levels in Northern Ireland, the CLC believes that there is a very real need for a renewed focus by the Government on ending child poverty. We wish to see a renewed impetus by the Northern Ireland on addressing child poverty and meeting its obligations under the Child Poverty Act with specific and measurable targets, including on severe child poverty, being reflected by the Executive within the final Programme for Government 2011 - 2015.

## Youth Justice Review Recommendations Commitment

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<sup>57</sup> Haydon, 2008

<sup>58</sup> Data drawn from the Department of Social Development, Northern Ireland Housing Statistics 2005-06, Statistics and Research Branch.

<sup>59</sup> "Better Odds at School" Save the Children 2010

<sup>60</sup> You Gov Poll for Save the Children, November 2006

<sup>61</sup> O'Reilly and Gaffney referenced in The Northern Ireland Commissioner for Children and Young People (NICCY) research, "Children's Rights in Northern Ireland" (2004)

<sup>62</sup> Northern Ireland House Condition Survey, 2006, NIHE

<sup>63</sup> Labour Force Survey household datasets, 2009, 2007



While we have already raised our concerns with the Minister for Justice and his officials and detailed our concerns in our recent response to the Report by the Independent Review Team into the Review of Youth Justice<sup>64</sup> we wish to again state our concern with regard to the DoJ Milestone / Output for 2013 / 2014 in the Draft Programme for Government 2011 – 2015 to Implement 90% of agreed Youth Justice Review recommendations<sup>65</sup>. The CLC has consistently highlighted the importance of the Hillsborough Agreement as a vital part of the constitutional peace settlement in Northern Ireland and the Independent Review of Youth Justice in Northern Ireland as part of commitment given in the Hillsborough Agreement. The CLC is clear that it views the Hillsborough Agreement as being on the continuum of the Good Friday Agreement (GFA) in that it delivers the next phase of the Northern Ireland constitutional peace process and in particular its focus on policing and justice provided for the devolution of these matters. This constitutional importance in our view demands that the provisions in the Hillsborough Agreement must be delivered as agreed and not diluted or reinterpreted. It is therefore extremely disheartening to note that before the consultation process on the Youth Justice Review Report into the Review of Youth Justice in Northern Ireland is completed and all responses have been received it is the DoJ's target to implement only 90% of agreed Youth Justice Review recommendations.

Given that many of the Youth Justice Review recommendations fall far short of what is required to ensure compliance with international children's rights standards and that a great deal of additional issues have not been addressed or sufficiently addressed in the necessary level of detail with the Report into the Review of Youth Justice, the DoJ's intention to implement only 90% of agreed Youth Justice Review recommendations is completely inadequate and unacceptable in delivering on the commitments given in the Hillsborough Agreement. Compliance with children's rights within the youth justice system should now be non-negotiable and we would have expected to see a much stronger commitment by the DoJ to ensuring delivery on compliance. It is the CLC's considered view that the DoJ should go much further than implementation of all of the Youth Justice Review recommendations in order to deliver on the Hillsborough commitments. We wish to see the DoJ amending its Programme for Government output target to the implementation as a minimum of all of the Youth Justice Review recommendations and we also wish to see the DoJ taking forward additional actions which are not contained in the restricted Review Report in order to fully deliver on what was committed to in the Hillsborough Agreement. We are also concerned that this statement in the Draft Programme for Government pre-empts the outcome of the consultation on the Report into the Review of Youth Justice and significantly challenges its integrity and independence.

## Conclusion

The Children's Law Centre is grateful for the opportunity to make this submission to the Northern Ireland Executive and to offer assistance and comment on its Draft Programme for Government 2011 - 2015. We hope that our comments have been constructive and useful and are more than happy to meet with staff from the

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<sup>64</sup> December 2011

<sup>65</sup> Page 42, Draft Programme for Government 2011-2015

Northern Ireland Executive or individual Government Departments to discuss anything raised in this response. We wish to be kept informed of progress in the development of the Draft Programme for Government 2011 - 2015 and look forward to being consulted with on the Delivery Guidance and on individual Departmental Delivery Plans as a matter of urgency. We look forward to the issues raised in this response being addressed and taken forward. We also look forward to receiving the information requested in this response at your earliest convenience.

## Chinese Welfare Association NI

PROGRAMME FOR GOVERNMENT – 2011-15 – CONSULTATION REPLY PROFORMA	
Organisation:	Chinese Welfare Association (CWA) NI
Contact Details:	Chinese Resource Centre, 1 Stranmillis Embankment  BELFAST, BT7 1 GB

### Question 1

Do you agree that the Programme for Government is designed and balanced in a way that is appropriate in enabling the delivery of its priorities?

If you do not agree, please explain why and what alternatives you would propose.

*(No more than 500 words)*

### Question 1

*'Equality is an important issue of the Executive and society alike. Inequalities do exist and we work hard to eliminate these. Our policies and programmes will be designed in ways that ensure we can address inequality and unfairness and create conditions that support inclusion and equality of opportunity.'* Extract from opening statement from Rt Hon Peter Robinson and Martin McGuinness, Draft PFG 2011 – 2015.

Chinese Welfare Association (CWA) warmly welcomes the above statement and this is integral in the delivery of all the priorities. Whilst the Ministerial statement is well balanced and inclusive, not all building blocks in the priorities include the Racial Equality Strategy to deliver its priorities to ensure this key inequality is addressed.

CWA would propose that the Racial Equality Strategy be included in all priorities as a building block.

*(No more than 500 words)*

### Question 2

Do you agree that the Programme for Government sufficiently links the key commitments to plans for delivery?

If you do not agree, please explain why and what alternatives you would propose.

## Question 2

1.No, the theme of racial equality requires the need for the Racial Equality Strategy as a building block to underpin all the priorities and determine the key commitments for delivery. This is discussed throughout the response.

Alternative: Inclusion of the Race Equality Strategy in all key commitments.

2.No, the PFG lacks the support to the voluntary and community sector.

Alternatives:

- As identified by NICVA: 'Unnecessary bureaucracy and red tape in government relationship with the voluntary and community organisations, and ,support for voluntary and community infrastructure including local development infrastructure.' CWA agrees with NICVA in this respect and would propose that community planning would include capacity building of minority ethnic communities to ensure successful achievement to priorities where 'equality is an important issue for the Executive and society alike.'

-Capacity-building programmes to ensure all Section 75 categories of the NI Agreement understand and prepare for changes across the region.

-Community Involvement programme to ensure meaningful input and engagement into the priorities from all Section 75 categories.

## Question 3

Do you agree that, in general, the key commitments contained within the document are appropriate to the successful achievement of priorities?

If you do not agree, please explain why and identify any potential gaps that may exist. *(No more than 500 words)*

## Question 3

No, the PFG does not identify actual commitments relating to the voluntary and community sector of which minority ethnic support organisations such as Chinese Welfare Association NI and many others, particularly those in receipt of OFMDFM Minority Ethnic Development Fund which work to promote good relations and capacity-building.

The minority ethnic community may be a small part of the society of Northern Ireland, however they are integral citizens which need the support of the voluntary and community sectors and statutory services. Therefore it is important that the Minority Ethnic Development Fund from OFMDFM is committed into the Programme for Government through an action of the Racial Equality Strategy. This relates to the answer on Question 6, that there is a real need to ensure the Racial Equality

Strategy is developed and implemented to underpin all the priorities of the PFG and in doing so organisations such as Chinese Welfare Association NI can support the PFG.

Question 4

Do you agree the Programme for Government is appropriately balanced in terms of sub-regional recognition? If you do not agree, please explain why and provide supporting information. *(No more than 500 words)*

Question 4

No. Much emphasis is placed on Derry and Belfast. Rural areas have less resources however community tensions, racial incidents and health inequalities exist in our experience beyond Derry and Belfast. Racism is a more difficult area to tackle in terms of hate-crime and discrimination in rural areas.

Question 5

Do you agree that the Programme for Government is appropriately balanced in terms of its recognition of major sectoral issues?

If you do not agree, please explain why and highlight any major sectoral issues for consideration. *(No more than 500 words)*

Question 5

In general the key 5 priorities provide a good balance of areas to focus, however there needs a weighting to include the Racial Equality Strategy under Priority 4 as key commitment with milestones from 2012 to 2015. CWA would welcome this inclusion.

Question 6

Do you agree that the Programme for Government presents its priorities and commitments in a way that is fair and inclusive to all?

If you do not agree, please explain why. *(No more than 500 words)*

Question 6

The PFG promotes equality however the absence or omission of the Racial Equality Strategy would raise concerns in promoting a fair and inclusive society.

There are core inequalities in the PFG to be addressed which require a Racial Equality Strategy 2012-2015. The Racial Equality Strategy ran from 2005 to 2010. Chinese Welfare Association is a member of the Racial Equality Panel which had been looking drafting the new Racial Equality Strategy. The last meeting was in

August 2011 for Panel members. In the absence of a Strategy, the approach to racial equality is uncoordinated. The previous Race Equality Strategy was a strong document with action plans stemming from it and departmental accountability ensured through the development in Race Champions. Prior to 2010, action plans of the previous Race Equality Strategy were held up in agreements of Good Relation Indicators to link with a 'Shared Future.'

The Programme for Government raises serious concerns about reducing inequalities generally and ignores ethnicity –based or racial inequality entirely. To ensure an inclusive society, CWA recommends that the Racial Equality Strategy be central to the CSI strategy and that forthcoming action plans be developed to ensure that social inclusion is at the fore to ensure equality for minority ethnic communities such as our Chinese community in Northern Ireland.

CWA proposes that the Racial Equality Strategy be developed and implemented to work in accordance as an underpinning key equality with CSI and the Programme for Government and that the Race Equality panel reconvene as soon as possible.

**Question 7** Are there any other issues in the Programme for Government that you wish to comment on? (No more than 500 words)

#### Question 7

The Chinese Welfare Association (CWA) is a voluntary organisation of over 25 years experience in the field of race and ethnicity whose staff operates direct services in the languages of English, Cantonese, Mandarin and English and was established by the Chinese Chamber of Commerce in 1986 as '*The voice and ears of the community.*'

CWA aims to provide support for Chinese people who may have problems accessing health or public services. Raising cultural awareness is also an important aim for the CWA as a way of tackling racism. In April 2009, Chinese Welfare Association secured the first multi-purpose built Chinese community centre in UK, the Chinese Resource Centre to promote Chinese culture and provide services to the Chinese community by working with all communities in linking with the statutory, government and voluntary sectors. CWA promotes the largest Chinese New Year celebrations annually, the Dragonboat Festival and the Mid-Autumn Festival and these events have been greatly welcomed and attended by all communities. Chinese Welfare Association works across the province and has a branch in Derry which is supported by a local Chinese group, Sai Pak (North West) Chinese Community Association.

Other Issues which CWA NI wish to comment are:

- The PFG requires more detail to establish the impact it makes on all communities.
- recognition of strong communities to support strong economy.
- a need for all communities to be involved in the process of shaping the PFG through meaningful engagement and consultation through facilitated workshops with

interpretation to support those with little or no English of which the document will pose a difficulty due to the language barrier .

- 'The importance of collaboration,' was highlighted in the document. This needs more clarification in the structures of collaboration and/ or cross departmental work to address the key commitments and resources.

- Social enterprise models cannot replace funding of the community and voluntary sector, particularly minority ethnic support organisations such as Chinese Welfare Association that work at providing direct services and advice and support statutory providers eg. PHA, NHSCT, WHSCT, BHSCT, PSNI, NIHE etc.

- Monitoring and evaluation of clear targets to be provided as not detailed in the PFG.

- Membership of the Advisory Group on Welfare Reform should include a member of the minority ethnic organisation to ensure inclusiveness and equality.

- CWA is a member of the Children and Young People's Strategic Partnership (Regional) and welcomes the 14 recommendations put forward by the Northern Ireland Commissioner for Children and Young People.

- CWA supports the response by Community Places in relation to Community Planning but would also like to include that community infrastructure and community development in community planning is inclusive of all communities, particularly in allocation of social housing to minority ethnic communities to ensure that community tensions do not rise where local indigenous communities do not feel threatened by their 'new' neighbours and racial tensions are considered. CWA has been working in an area to reduce high tension and improve race relations and we would not like to see this replicated in other areas. The PFG requires good relations practice and community cohesion measures but also must ensure equality for all communities in social housing

## Chivers L

This is my response to the consultation on the Draft Programme for Government (PfG) 2011–2015.

I am concerned that the Draft PfG lacks an overall vision and is light on key commitments for the natural environment. I believe that the Assembly needs to show the spirit and vision that is needed to make Northern Ireland a leader in sustainability and an example of what local democracy can achieve.

There is an intense focus in the PfG upon growing the economy but this should not be at the expense of the natural environment. Indeed, a healthy environment directly contributes towards a healthy economy – sustainable tourism and creation of the jobs needed to deliver a low carbon economy, are just two examples.

Whilst there are some good things in the Draft PfG, such as a revised Biodiversity Strategy and an Invasive Species Strategy, the document fails to put in place measures to help deliver them. In addition, there a number of significant gaps in the document that must be filled. I ask that the following targets are included in the PfG:

- A Northern Ireland Climate Change Act, with tangible emissions reduction targets for each sector. Currently we are 99% reliant on increasingly expensive imported energy. If we move to a low-carbon economy with a thriving renewable energy sector our energy supply will be secure, and we will have created thousands of new jobs and attracted major investment. Committing to a Climate Change Act would help us deliver this low-carbon economy.
- The creation of an independent environmental protection agency. This would act as a champion for sustainability and environmental protection, and prevent costly indecision and slow action on safeguarding our environment which leaves Northern Ireland taxpayers repeatedly exposed to the risk of enormous fines for breach of EU environmental law.
- A Northern Ireland Marine Act which ensures a framework for healthy seas and protection for a range of marine species.
- A reformed planning system with sustainability at its heart. I want to see a planning system that can help deliver a thriving economy whilst protecting our natural, built and cultural heritage. All development must be truly sustainable and promote long-term societal benefits, and deliver improved health and wellbeing.
- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of halting biodiversity decline and they also provide a range of other benefits including helping support rural communities by providing financial support to farmers and creating significant socio-economic benefits.

Finally, I want the Assembly to ‘Step Up for Nature’ by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely LChivers



## Christie P

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Finally, I want the Assembly to ‘Step Up for Nature’ by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely

PChristie

## Christian Aid



Christian Aid Ireland submission to the consultation on the Draft Programme for Government:

There are two priorities outlined in the draft programme for government that relate to the advocacy work of Christian Aid.

Press for the devolution of corporation tax and reduce its level.

Christian Aid estimates that poor countries may lose as much as \$160 billion each year as a result of tax dodging by some unscrupulous multinational companies. It is acknowledged by the OECD that poor countries lose far more to tax dodging than they currently receive in aid. In part this is facilitated by financial secrecy and the use, by some multinationals, of subsidiaries based in low tax jurisdictions to shift profits out of poor countries into these jurisdictions.

Whilst Christian Aid does not take a view on the headline rate of corporation tax, when Northern Ireland is debating whether to introduce a low rate of corporation tax, it is imperative from a moral, ethical and Christian perspective to consider the potential impact of such policies on the very poor.

We call on the Northern Ireland executive to consider appropriate measures to ensure that a lower corporation tax rate in Northern Ireland can not be utilised by unscrupulous companies in order to dodge taxes due elsewhere.

Continue to work towards a reduction in greenhouse gas emissions by at least 35% on 1990s levels by 2025

Christian Aid recognises that climate change is disproportionately affecting some of the poorest communities in the world and yet the richest nations have historical responsibility for the emissions that are causing the problem.

Christian Aid are members of Stop Climate Chaos in Northern Ireland and along with the other member organisations we believe that it is essential that ambitious targets for cuts in greenhouse gas emissions are included in binding legislation that will provide the necessary impetus for action to tackle climate change from government and private sector.

We call on the Northern Ireland executive to include a commitment to introduce an ambitious Northern Ireland climate act in the Programme for Government.

The targets for emissions cuts need to be ambitious and need to be in line with what the latest science is suggesting will be necessary in order to avoid a 2°C rise in global average temperature. This would mean cuts in greenhouse gas emissions of at least 40% by 2020 and at least 80% by 2050.

## Chartered Institute of Environmental Health NI

Response to and comments on Draft

Programme for Government-

“Building a better future”

2011 - 2015

February 2012

2

1: General comments and analysis

1.1 We acknowledge and indeed believe that there is a genuine commitment by the Executive to deliver a fairer, more equitable society. However we believe there are currently some significant weaknesses and flaws. This brief paper seeks to elaborate on those that we see as being of significance to both the sustainability of Northern Ireland as well as the health and wellbeing of its people.

1.2 With regards to the actual priorities identified within the programme we would concur that these are all key priorities for Northern Ireland (NI) moving forward. Whether or not they can be so specifically prioritised is another matter. There are fundamental interdependencies between most of them. For example priority 2 (tackling disadvantage and improving health and wellbeing) is fundamentally linked to priorities 3 and 4. Likewise the number one priority (growing a sustainable economy – we note and wholeheartedly support the concept of a sustainable economy) will fundamentally depend upon priorities 2, 3, and 4.

1.3 This PfG is presented after the four year budget set by the Minister for Finance. This is a fundamental flaw in our view. Budget discussions and allocations should follow rather than precede the PfG and we believe that the fact it has not may explain some areas of what we believe are notable under ambition in the programme.

1.4 Following on from the previous point, overall the PfG lacks ambition, specific tangible targets/goals in some key areas, and rather looks like a collection of existing programmes and/or projections rather than being the challenging framework it could be. In addition, without tangible (SMART) goals, it is difficult to see how progress will actually be assessed.

1.5 Whilst there are a few legislative commitments on the programme overall it lacks a detailed draft legislative programme aligned to the priority areas.

1.6 We believe that the programme of public sector reform is too narrowly focused on local government and will not realise the efficiency savings that seem to be the driving force for such reform. Overall the review of public administration has been a significant disappointment and has failed thus far to realise most of what it promised

originally in terms of not only more efficient services, but also the delivery of services close to communities (subsidiarity) as well as the integration of structures, so critical to joined up governance and public service delivery. We do not believe the current models are yet right and, particularly given the commitment within the PfG to review existing government structures with a view to change post 2015, would suggest that restructuring local authorities (and indeed the current model) should be reconsidered in this wider context.

1.7 Whilst recognising both equity and public health issues that exist around water charges, and the need for any system to adequately address these, it is difficult to see how the significant issues, including public health issues, that could arise in the future with continued underinvestment in the water and sewerage system are to be addressed whilst the executive adheres to its current policy position on this.

## 2: Specific issues

2.1 There are some specific areas that we would particularly highlight in the sense that either the current target/goal is too weak or, in other cases is missing altogether.

2.2 The absence of a commitment to statutorily binding greenhouse gas emission reductions in the form of a Climate Change Act for NI is, in our view, particularly disappointing. Not only that but, given Priority 1, we believe that the only economically, socially and environmentally sustainable economy for NI is a low carbon one. Statutory targets on carbon emission reduction are absolutely essential to drive such an economy. These should be challenging and based upon the best available science (currently suggesting a reduction of 40% by 2020). We would strongly urge the inclusion of such legislation within the PfG rather than simply the ambiguous, non-committed statement that currently exists in the draft.

2.3 Similarly, the absence of any commitment to the Green New Deal, despite promising developments at the time of the budget debate, is also very disappointing. This kind of model offers a real and tangible way to provide new jobs linked to a green economy; reduce emissions; and reduce household costs thereby helping to alleviate fuel poverty, which is a serious public health issue for NI.

2.4 Regarding the target of 90% large scale planning decisions within 6 months and applications with job creation being given more weight, we question the sustainability of this policy if the right balance is not achieved. The Planning Service should exist for the public interest and strike the appropriate balance between economic development, local concerns and the environment. While there should be clear targets for the streamlining of the service, delivering real efficiencies in process, economic concerns should not outweigh the imperative for good planning, respecting existing Area and Local plans and the environment more generally.

2.5 We would support a revised and fully developed planning system delivered by local authorities by 2015 with a full set of Area Plans and Community Planning system in place

2.5 While acknowledging the commitment to 'promote' sustainable modes of transport under Priority 3, it is a concern that roads investment is seen as a critical contributor to sustainable economic growth. We believe that economic goals can be achieved through implementation of a Regional Transport Strategy which focuses more heavily on public transport and walking/cycling, to deliver reduced congestion and improved journey times. There is also a clear link between more sustainable transport modes and health outcomes.

2.6 There should be a commitment (within priority Area 3) to improve Home Safety, a cause of more accidents treated in A&E departments (over 70,000) than roads and workplaces put together<sup>1</sup>. Road safety has, rightly, been made a key commitment yet in 2009, when there were 115 deaths on our roads<sup>2</sup>, there were 116 deaths caused by home accidents<sup>3</sup>. Hospital admissions for 2009/10 record 1,613 due to road accidents and 3,423 due to home accidents.

4 Additional funding was given to road safety measures but no additional funding was provided for home safety yet undoubtedly the cost of treating home accidents places a huge cost on the UK health service, estimated by Transport Research Laboratory to be £43.65 billion - £16,900 per victim.

5 These financial burdens on the health service could potentially be significantly reduced by some very modest investment in preventative approaches. The Environmental Health Service in NI is well placed (and has already demonstrated) to provide such intervention.

1 DHSS&PS NI & RoSPA Accident & Emergency Survey 2000/01

2[http://www.ninis.nisra.gov.uk/mapxtreme/viewdata/Transport\\_Travel\\_and\\_Tourism/Transport/InjuryRoadTrafficCollisionsCasualties/Injury\\_RTCs\\_and\\_Casualties\\_2009.xls](http://www.ninis.nisra.gov.uk/mapxtreme/viewdata/Transport_Travel_and_Tourism/Transport/InjuryRoadTrafficCollisionsCasualties/Injury_RTCs_and_Casualties_2009.xls)

3[http://www.nisra.gov.uk/archive/demography/publications/annual\\_reports/2010/Tab1e6.12\\_2010.XLS](http://www.nisra.gov.uk/archive/demography/publications/annual_reports/2010/Tab1e6.12_2010.XLS)

4[http://www.ninis.nisra.gov.uk/mapxtreme/viewdata/Health\\_and\\_Care/Health/Hospital\\_Admissions/Hospital\\_Admissions\\_Accidents\\_2009-10.xls](http://www.ninis.nisra.gov.uk/mapxtreme/viewdata/Health_and_Care/Health/Hospital_Admissions/Hospital_Admissions_Accidents_2009-10.xls)

5 <http://www.rospace.com/homesafety/Info/re-valuation.pdf>

5 The Chartered Institute of Environmental Health

As a professional body, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners.

As a knowledge centre, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines, run educational events and commission research.

As an awarding body, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, wellbeing and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners.

As a campaigning organisation, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a registered charity with over 10,500 members across England, Wales and Northern Ireland.

## Children in Northern Ireland



Response Northern Ireland Executive

Draft Programme for Government 2011-15

February 2012

### INTRODUCTION

Children in Northern Ireland (CiNI) is the regional umbrella body for the children's sector in Northern Ireland. CiNI represents the interests of its 150 member organisations, providing policy, information, training, participation and advocacy support services to members in their direct work with and for children and young people.

CiNI's membership is open to colleagues in the children's statutory sector recognising that the best outcomes for children are increasingly achieved working in partnership with all those who are committed to improving the lives of children and young people in Northern Ireland.

CiNI hosts the Participation Network, an initiative supported by OFMDFM, which offers direct training, consultancy and sign posting services to government departments and public sector agencies to help them develop the knowledge, skills and expertise to engage directly with children and young people when carrying out their functions.

As part of our commitment to partnership working CiNI is a member of the Children and Young People's Strategic Partnership (the Partnership) and also the interim regional Child Protection Committee.

CiNI welcomes this opportunity to respond to the Northern Ireland Executive's Draft Programme for Government 2011-15.

CiNI held a consultation workshop to brief members on the draft PfG. The workshop included input from OFMDFM and Children's Champions from DE, DARD, DSD and DETI. The consultation event provided those 20 member organisations in attendance with an opportunity to consider and discuss the draft PfG consultation document. The workshop discussion has informed CiNI's submission to the consultation. Please see appendix for list of members in attendance.

### GENERAL COMMENTS



## Equality, Fairness and Inclusion

It is positive to see that there is now a recognition, which was absent in the last PfG, of the intrinsic link and indeed inter-dependency between social progress and growing the economy. This connection is vitally important and requires concerted efforts to ensure that the Executive, through PfG, accords high priority to identifying, and tackling the level and extent of inequalities which exist across society and which place real barriers in the way of all members and sections of society contributing to re-building the economy and enjoying a fair share of progress that can be made in moving society forward.

However, CiNI is not convinced that there is the required commitment to and, indeed, evidence of equality of opportunity, fairness and inclusion permeating and underpinning the draft PfG. We struggle to see a clear, purposeful strategic intent within the commitment plan, given that it appears as an erratic mix of some high level commitments and other commitments carried over from existing strategy and policy initiatives where implementation remains outstanding.

## Sequencing and relationship with the Budget

CiNI has previously raised concerns regarding the sequencing and inter-relationship between the PfG and Budget/Spending Review processes.

This is an issue which has received much attention and raised significant concern amongst commentators and indeed legislators.

A 2011 PWC Overview Report commissioned by NICVA, commenting on the draft Budget 2011-15, stated that it was *'less than ideal'* that a Budget should be agreed before a new Programme for Government is in place<sup>66</sup>. The agreement of a budget ahead of targets and outcomes for public services is *'a reversal of what ideally should be the sequence of decision making, i.e. agree desirable outcomes and then assign budget lines as necessary.'*

Furthermore, CiNI would highlight that the Committee for Finance and Personnel in its First Report of the Inquiry into the Scrutiny of the Executive's Budget and Expenditure 2008-11 did recommend that *'that there should be a closer alignment between the PfG and the Budget documents; in particular a more visible linkage between PfG priorities and goals, PSA objectives and the allocations, departmental objectives and spending areas in budgets'*<sup>67</sup>. In its Second Report on the Inquiry into the Role of the Northern Ireland Assembly in Scrutinising the Executive's Budget and Expenditure the Committee further recommended *'whilst recognising that the availability of resources will have a bearing on the targets underpinning the PfG, the Committee is strongly of the view that budget allocations should be driven by priorities and not the other way around. The Committee concurs with the DFP view that "there should at least be a clear indication of broad priorities at the beginning of*

<sup>66</sup> NICVA Overview of the NI Draft Budget 2011-15. PWC. Belfast p.31

<sup>67</sup> Committee for Finance and Personnel (2008) First Report of Inquiry into the scrutiny of the Executive's Budget and Expenditure 2008-11 para 7

the Budget process" and that the development of the PfG should precede the Budget<sup>68</sup> [own underlining].

Therefore, we would again recommend that urgent attention is directed toward ensuring that the PfG, Budget, Departmental Delivery and Spending Plans and accompanying Equality Impact Assessments are tied together seamlessly in order to allow for the development of a robust, coherent and cohesive vision and plan for moving Northern Ireland forward.

The sequencing issues have made it particularly difficult to comment in an informed and considered manner. This was an issue raised by those who attended the CiNI consultation workshop when it was highlighted that the draft PfG, rather than being solution focused and outcome driven, raised many more questions regarding the intent and strategic direction of the Executive. Many of the questions relate to the detail that is lacking in relation to the commitment programme and which is ultimately crucial to the delivery process.

We note that it is intended by the end of the consultation period on the draft PfG that each of the Government Departments will have produced detailed delivery plans setting out how they will take forward delivery of PfG. However, it is our firm view that in the interests of optimal transparency and accountability these delivery plans should have been developed alongside the draft PfG and made available for full public consultation as part of the PfG consultation.

We would ask the Executive to provide details of its plans for publication of all of the draft departmental delivery plans including the arrangements for public consultation, screening and equality impact assessment as required by Section 75 of the Northern Ireland Act 1998.

However, given that these draft delivery plans are being developed in light of the draft PfG they will also require amendment in line with the outcome of the consultation and agreement of the final PfG. Therefore this is likely to lead to a lengthy period of time before final agreement is reached on delivery of the PfG.

### Programme Arrangements and Delivery Framework

CiNI notes Annex 1 to the draft PfG outlines the programme arrangements and delivery framework. We note that the Executive is to agree on the approach to delivery and the mechanisms to support this, and detailed guidance will be produced<sup>69</sup>. Again we believe that the delivery arrangements are a fundamental element of the entire PfG process and would suggest that these arrangements will provide the crucial bridging mechanism between PfG and the departmental delivery. Therefore, we strongly believe that these arrangements and the delivery framework should have been developed and integrated within the PfG and included as part of the overall consultation. We assume that Departments are in the process of

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<sup>68</sup> Committee for Finance and Personnel (2010) Second Report of Inquiry into the Role of the Northern Ireland Assembly in Scrutinising the Executive's Budget and Expenditure para 17

<sup>69</sup> NI Executive Draft PfG 2011-15 p.54

developing detailed delivery plans and therefore would be in receipt of and using the detailed guidance on delivery. This guidance must be produced and published as part of consultation on department delivery plans.

Given that the draft PfG asserts that *'all departments of Government must work together to produce policies, plans and strategies – the building blocks – that are consistent with the priorities we (the Executive) have identified'*<sup>70</sup>, it is crucial that the delivery framework *explicitly* builds in and includes a mechanism through which to monitor, assess and evaluate the level, extent and outcome of this 'working together' both across and between Government departments and with the voluntary and community sectors.

While the draft PfG consultation document does not make reference to detailed departmental delivery plans, it is our understanding, as we have indicated above, that these will be produced by each department at the end of the consultation period. A strong view from the CiNI consultation workshop was that these delivery plans would be critical in providing the answers to many of the questions raised by the draft PfG. Again we would highlight that it is essential all of the delivery plans are subject to full public consultation, screening and equality impact assessment in line with the requirement to promote equality of opportunity under section 75 of the Northern Ireland Act 1998.

At the CiNI consultation workshop it was highlighted that the children's sector was keen to support and inform the development of these delivery plans. The imperative to involve and engage children and young people was also highlighted in line with requirements of section 75 and article 12 of the UNCRC. Particular regard must also be given to ensuring direct engagement and involvement of children and young people with disabilities in line with the Executive's obligations in respect of article 7 of the UNCRPD.

We note also that reference is made to a legislative programme, however we are unaware of the existence of this programme and would recommend that it is included as part of the final, agreed PfG.

### Collaboration and Partnership Working

It is welcome that the First and Deputy First Ministers have stated that they are *'conscious of the importance of collaboration ... working more effectively across Government Departments and working in partnership with the private and the voluntary and community sectors in ways that will deliver tangible outcomes'*<sup>71</sup>.

However, we are disappointed and concerned that there is limited evidence within the draft PfG of any follow through on or mainstreaming of collaboration and partnership working across the commitment programme. The majority of the commitments across the priorities are tagged to individual departments and, therefore, the draft PfG has missed a crucial opportunity to embed a more holistic

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<sup>70</sup> NI Executive Draft PfG 2011-15 Consultation p.27

<sup>71</sup> NI Executive Draft PfG 2011-15 p.12

outcomes focused approach to how the Executive does its business, an approach that we would suggest could ensure optimal use of scarce resources. For example, while commitments to increase the numbers of primary and secondary school pupils opting to walk to school as their main mode of transport are positive and welcome, tagging commitments to one lead department fails to see the holistic impact for children and young people and the benefits that could be derived by other Government departments in taking forward their commitments to children and young people. Clearly increased numbers of children walking to school can also support the DHSSPS commitments to tackling obesity.

CiNI firmly believes that given the welcome recognition from the First and Deputy First Minister of the importance of collaboration and working more effectively across Government Departments, there is now a need for a more pro-active approach by the Executive to making effective collaboration a reality. Given the nature of how the draft PfG commitment programme has been constructed we do not believe that there exists the required impetus to follow through and deliver on effective collaboration. However, we do acknowledge that there are real and positive examples of Government departments collaborating and working across boundaries on issues of common concern. Unfortunately this is not a mainstream, required or expected priority for departments when examining their budgets, identifying their priorities and delivering on common agreed outcomes.

CiNI believes that it is now essential that a mechanism is put in place to secure and deliver on collaboration and co-operation so that it can be embedded in the functioning of Government departments.

In this regard, CiNI would highlight there is now a broad based and growing consensus emerging on the need for a statutory duty on Government departments to co-operate, a duty which must transcend all levels and layers of Government. This has been evidenced in research commissioned by NICCY and conducted by QUB on Barriers to Effective Government Delivery for Children<sup>72</sup>. The views expressed by NGOs, statutory agencies, government representatives and MLAs are worth noting.

The research noted that while there was some evidence of good practice on collaboration at intra-agency level through the work of Children's Services Planning, this was not always replicated at central government level.

*'For the majority of interviewees, the problems associated with joined up working at central government level were viewed as the main barrier to effective government delivery for children'* [own underlining].

It is interesting to note how joined up working is currently perceived as operating:

*'... joined up working between departments was perceived to be based primarily upon goodwill, and the prior existence of good working relationships between individuals in respective departments was viewed as a particular issue resulting in*

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<sup>72</sup> Byrne, B. and Lundy, L. (2011) Barriers to Effective Government Delivery for Children in Northern Ireland 2011, NICCY.

*inconsistency of practice across the Ten Year Strategy areas (NGO and Statutory Agency representatives).'*

As we have highlighted above the key point is that collaboration and joined up working is not a mainstream experience or indeed the requirement or expectation in relation to the functioning of departments. In other words, some children will be the beneficiaries of the 'goodwill' and 'good working relationships' where there is joined up working on policy areas that impact upon them; but, worryingly, the inconsistency means that the majority of children will not experience the impact of the joining up of policy areas which ultimately aligns with a holistic approach to service design and delivery and which supports better outcomes for children and young people.

This differential and discriminatory treatment of children and young people in respect of policy development which impacts on their lives can no longer be justified.

The findings from the NICCY research are clear:

*'For the majority of interviewees, the only effective solution to these ongoing issues lies in the urgent need for the establishment of a statutory duty to co-operate'.*

In drawing its conclusions the research recommends that there is a need within Government for a statutory duty to co-operate at both central government and intra-agency level. CiNI would echo and wholeheartedly support these findings and recommendations.

### Concordat between Government and the Voluntary and Community Sector

CiNI welcomes that the Executive has signalled the intention to work in partnership with the private and the voluntary and community sectors in ways that will deliver tangible outcomes<sup>73</sup>. However, again there is a need for much greater detail on precisely how the intention will be delivered on. We would strongly advocate that to turn intent into reality the PfG must include an explicit commitment to upholding and delivering on the Concordat between Government and the Voluntary and Community Sector in Northern Ireland<sup>74</sup>. It is only through focused and joint delivery on the series of commitments made in the Concordat that true partnership can be enabled to support delivery on the PfG.

### A PfG for Children and Young People?

CiNI does acknowledge that across the draft PfG commitment programme there are a significant number of positive commitments directed toward children and young people. We are, however, disappointed that the draft PfG has not seized the opportunity to provide a coherent strategic vision that places children and young people at the heart of PfG, and thereby recognises and seeks to support and enable children and young people as key contributors to building the Executive's better future for Northern Ireland.

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<sup>73</sup> NI Executive Draft PfG 2011-15 Consultation p.12

<sup>74</sup> <http://www.nicva.org/sites/default/files/ConcordatConsultation.pdf>



We are disappointed that the international children's rights standards of the UNCRC and the Executive 10 Year Strategy for Children and Young People, which are the 'critical enablers' that could ensure children and young people sit at the heart of PfG, are not recognised as enablers by the draft PfG or given a particular status beyond that of building blocks. As a result their significance is not properly understood and acknowledged in terms of how these could be utilised by the Executive in support of the PfG.

#### International Children's Rights Standards

CiNI would highlight in particular the Executive's obligations with regard to international binding agreements on children's rights and in particular the UNCRC, which has been ratified by the UK Government and which it is obliged to implement through legislation, policy and service delivery for children and young people across all aspects of their lives.

We would highlight that these international binding agreements must over-arch and inform the development of the PfG. The UNCRC is much more than a building block that can support PfG priorities, its binding standards and obligations are pivotal to informing and guiding identification and development of the Executive's priorities in relation to children and young people. The Executive is examined by the UN Committee on the Rights of the Child with regard to its delivery on the UNCRC every five years and subsequent to these examinations the Committee issues its Concluding Observations and Recommendations to Government on what it must do to ensure compliance and delivery on the principles and provisions of the Convention. The most recent Concluding Observations were issued in 2008 and the Executive is due to report again to the UN Committee in 2014, that is, within the period of the current PfG.

We therefore strongly recommend that the PfG give proper recognition to the status of the UNCRC as an international binding agreement and include a commitment from the Executive to addressing the Committee on the Rights of the Child Concluding Observations. We would recommend that part of this commitment should be a direction to Government departments to address the Concluding Observations in their delivery of PfG.

#### Executive 10 Year Strategy for Children and Young People

CiNI would strongly advocate that the draft PfG recognise the significant cross cutting and over-arching remit of the 10 Year Children and Young People's Strategy as a vehicle through which to take forward Executive implementation of the UNCRC. The significance of the 10 Year Strategy goes far beyond that of a building block that currently informs only one of the draft PfG priorities<sup>75</sup>.

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<sup>75</sup> NI Executive Draft PfG 2011-15 Consultation p.35

However, CiNI has been encouraged by the renewed impetus which has now been directed at getting the 10 Year Strategy moving forward, with work commencing on the development of a new action plan for 2012-2016. For some time the absence of a dedicated strategic focus on children and young people within OFMDFM and the subsequent lack of activity on the Strategy's implementation caused grave concern for the children's sector and created a perception, real or otherwise, of children and young people being pushed down the agenda of the Executive. However, we trust that with close and ongoing engagement and partnership with the sector, and placing children and young people themselves at the centre of the process, a positive momentum can now be created to look at how the Strategy can be effectively implemented in support of the Executive's delivery of the UNCRC.

However, it is imperative that the 10 Year Children and Young People's Strategy, its outcomes framework and commitment to the UNCRC are acknowledged, recognised and firmly established by the PfG as *the* lead over-arching strategic framework for the development of *all* of the Executive's strategic policy developments affecting children and young people.

#### Children and Young People's Strategic Partnership (CYPSP)

CiNI is greatly encouraged that OFMDFM in developing its plans for taking forward the 10 Year Children and Young People's Strategy has recognised that the Children and Young People's Strategic Partnership is key to effective delivery<sup>76</sup>. In its representations to Government CiNI has consistently highlighted the need for closer alignment between the Strategy and regional arrangements for integrated planning and commissioning of supports and services through the Children and Young People's Strategic Partnership and its Children and Young People's Plan.

It is significant to note that the Partnership has adopted the UNCRC and the 10 Year Strategy's outcomes framework as the over-arching strategic context for its work on integrated planning for children and young people.

CiNI would strongly advocate that the PfG recognise and support the Partnership as the optimal vehicle through which to drive forward implementation of the PfG commitments for children and young people. Each Government department, in development of their PfG delivery plans, must be encouraged and supported to consider how they can utilise and link to the Partnership to deliver and take forward their commitments to children and young people. We would recommend that guidance to this effect is explicitly provided within the delivery framework which is currently being developed.

#### Early Intervention and Prevention

CiNI is particularly disappointed that the draft PfG has not acknowledged and responded to the growing momentum within and across Government in support of early intervention and preventative spending to secure better outcomes for children, young people and families. The research evidence in support of such an approach

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<sup>76</sup> OFMDFM Presentation to APGCYP Meeting 07.02.12



continues to grow and the economic case in support of utilising scarce resources to best effect is well acknowledged across Government.

CiNI would highlight the RLS Research Paper<sup>77</sup> which, reflecting on the Scottish Finance Committee Inquiry into Preventative Spending, notes that while Northern Ireland is one of the most economically deprived regions of the UK, each year Government spends a significant amount of money treating the outcomes associated with deprivation rather than on preventative solutions aimed at breaking the cycle. All of the evidence to the Scottish Inquiry attested to preventative spending as the key to breaking the cycle of deprivation, expressed concern regarding the insufficient investment in preventative spend, and pointed to the real and lasting savings that are possible if Government were to adopt a preventative spending approach.

The Scottish Inquiry identified three ideas for financing preventative spending:

- A proportional shift in the emphasis of government spending towards preventative programmes, with the savings increasingly reinvested in preventative schemes
- Greater use of 'pooled' cross departmental budgets set aside to tackle issues
- Frontloading social investment with the issue of social impact bonds

Critically the RLS Research Paper concludes that *'cross-departmental partnership and joined up government are the required foundations for preventative spending interventions'*.

Given these conclusions, it is therefore encouraging to note that much of the work to promote and embed early intervention and prevention is now being lead by the cross-sectoral and multi-agency Children and Young People's Strategic Partnership. Indeed, its role and potential contribution to this work is increasingly receiving endorsement. The recent report from the Independent Review of Youth Justice has recognised that:

*The most promising route for developing early intervention and family support would seem to be at the more local level, through the recently formed Children and Young People's Strategic Partnership.*

In its draft plan for 2011-14 the Partnership commits to bringing an increased focus on early intervention. It is notable that the Partnership has taken the view that early intervention must be a joint Government priority.

CiNI would recommend that the PfG establishes early intervention as a joint government priority. In the absence of a mandate from the Executive and through PfG for a focus on early intervention, CiNI is fearful that all of the existing good work on early intervention, which is in place at local level, will continue on a disparate basis, with separate funding streams that are not joined up to best effect.

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<sup>77</sup> RLS (2011) Preventative Spending NIAR 19-11

However, again we are greatly encouraged that OFMDFM in developing its plans for taking forward the 10 Year Children and Young People's Strategy has indicated that at a strategic level there will be a focus on the promotion of early intervention<sup>78</sup>.

CiNI would recommend that responsibility for championing early intervention and prevention should be located at the highest level of government, that is, within a properly functioning and robust Ministerial Sub Committee on Children and Young People that includes all of the relevant and appropriate Government departments. This Ministerial Committee must have at its core responsibility for examining mainstream budgets to look at how these can be re-aligned to support and enable a drive for early intervention and prevention, with the appropriate disaggregation of spend to support the specific forms of early age and early stage interventions that are required for particular vulnerable groups.

### Child Poverty

CiNI notes the OFMDFM commitment to *fulfil our commitments under the Child Poverty Act to reduce child poverty*. We are extremely concerned that given the legislative obligations on the Executive to address child poverty the draft PfG does not contain more robust, specific and measurable targets for a reduction and eradication of child poverty. This is of particular concern given the targets included in the Executive's previous PfG for 2008-11. It is all the more concerning given that the Delivery Report on PfG 08-11, which has considered progress made up to 31<sup>st</sup> March 2011<sup>79</sup>, indicates that targets to eliminate severe child poverty and reduce overall child poverty were not delivered. There is a need for a renewed and concerted effort by the Executive to prioritise its obligations under the Child Poverty Act and ensure that specific and measurable targets, including on severe child poverty, are an integral part of the Child Poverty Action Plan.

### Children and Young People with Disabilities

CiNI is disappointed that children and young people with disabilities are invisible within the draft PfG and its commitment programme. This is of particular concern given the evidence which continues to emerge of the disproportionate negative impact which the current economic downturn is having on children and young people with disabilities and their families. The Children with Disabilities Strategic Alliance<sup>80</sup> has pointed to evidence that would suggest that children with disabilities and their families are being adversely and disproportionately affected by Government spending decisions with funding for some disabled children's services being withdrawn or reduced<sup>81</sup>.

CDSA has called on the Executive to make children and young people with disabilities a priority in PfG and Budget/Spending processes. To accurately and appropriately inform PfG and Budget/Spending processes from the perspective of children with disabilities and their families, the Alliance has called for a broad

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<sup>78</sup> OFMDFM Presentation to APGCYP Meeting 07.02.12

<sup>79</sup> Building a Better Future The NI Executive's PfG 08-11 Delivery Report on Progress up to 31<sup>st</sup> March 2011

<sup>80</sup> <http://www.ci-ni.org.uk/docs/CDSA%20Manifesto%20No%20CropIld.pdf>

<sup>81</sup> <http://www.familyfund.org.uk/news/news-and-announcements/funding-northern-ireland-1>

strategic review of all aspects of services for disabled children and young people to ensure that the current configuration of disabled children's services meets their needs and that gaps in current provision and unmet needs are identified. CDSA has indicated that the review should be undertaken in partnership with the disability and children's sector and ensure that the role played by the sectors in developing innovative child and family centred approaches is recognised and adequately resourced. A review of this nature has been undertaken in Scotland with the intention that actions emanating from the Review could help support key elements of the Scottish Government's performance framework and deliver practical improvements to the well-being of children with disabilities and their families<sup>82</sup>.

In addition, to accurately inform the PfG, departmental delivery plans and subsequent spending decisions from the perspective of children with disabilities and their families, there is an urgent need for the Executive to address the lack of disaggregated data and information on the circumstances and situation of children with disabilities, including the lack of information on the prevalence of particular disabilities/conditions. As recommended by CDSA, the Executive must develop a cross Government data gathering system that allows for the collation and monitoring of all aspects of the lives of children and young people with a disability. Such data would allow for a comprehensive assessment of the level and extent of inequalities experienced by children with disabilities in accessing and benefiting from public services, and ensure that policies and resources effectively enable the promotion of equality of opportunity.

The PfG must make children with disabilities and their families a visible priority by ensuring that the commitment programme is inclusive of children with disabilities and includes specific, focused commitments that can promote equality of opportunity for children with disabilities and their families. It is essential that this prioritisation is carried forward into the departmental delivery plans and these must be monitored to ensure children with disabilities have equal access to and benefit from support and services.

### Early Childhood Education and Care

CiNI notes the commitment to implement an integrated and affordable childcare strategy. The commitment is very much welcomed, however more detail is required. In particular we are keen to explore further and support the development of an *integrated* childcare strategy.

It is our firm view that a future childcare strategy must be fully integrated within an overall strategic approach by the Executive to Early Childhood Education and Care Services (ECEC) for Northern Ireland<sup>83</sup>.

We would highlight that the previous PfG for 2008-11 did recognise the need for co-ordination and integration to bring early years care and education together and we

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<sup>82</sup> <http://www.scotland.gov.uk/Publications/2011/02/25151901/1>

<sup>83</sup> This is also the view of the Early Years Strategic Alliance (EYSA) as outlined in its Manifesto published in November 2011.

would advocate that this is carried forward into the current PfG, given that the target remains outstanding and requires further work and much greater prioritisation.

ECEC services are established and well recognised across Europe. According to the Organisation for Economic Co-operation and Development, ECEC usually means all services providing education and care to children below compulsory school age or before starting school. It reflects a broad, holistic, integrated and coherent approach to early years. The term reflects new attitudes and understandings about ECEC such as:

An acknowledgement that all types of services which provide education and care to children under school age belong to the same policy field

A shared desire to identify, understand and overcome barriers that have obstructed integrated action i.e. philosophy, objectives, management, regulation

A shift from selective and exclusive to universal and inclusive

A right for all children and families

However, the ongoing parallel development of strategic responses to early years and childcare and the failure to establish lead ministerial responsibility for this area militates against and acts as a barrier to effective integration; and most fundamentally undermines efforts to protect and promote the best interests of children and families. With parallel strategic approaches there is the potential for duplication of processes and procedures which increases the likelihood of scarce resources being wasted. Children from birth to age 3 are particularly disadvantaged by the failure to effectively integrate early childhood care and education systems.

The Early Years Strategic Alliance (EYSA) has recommended that the Minister for Health, Social Services and Public Safety take lead ministerial responsibility for fully integrated ECEC services<sup>84</sup>. This must be underpinned by a commitment from all Executive Ministers to co-operate and work in partnership on early years and childcare through the mechanism of the Ministerial Sub-Committee on Children and Young People. Critical to this partnership working is the pooling of resources in support of ECEC. The Alliance has recommended that the Executive incentivise the pooling of resources for early years and childcare provision.

EYSA has expressed its concern at the neglect of our current childcare infrastructure which has resulted in a lack of childcare provision, particularly in rural areas and also more expensive childcare provision, with limited awareness amongst parents of the availability of support for childcare costs. Therefore, within a fully integrated approach to Early Childhood Education and Care Services (ECEC) there must be specific attention given to ensuring high quality, accessible, affordable and appropriate childcare services.

## CONSULTATION WITH CHILDREN AND YOUNG PEOPLE

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<sup>84</sup> <http://www.ci-ni.org.uk/docs/EYSAManifestoFINAL.pdf>

CiNI is concerned at the delay in the production of a child friendly version of the draft PfG consultation and EQIA. We would highlight that to comply with the Section 75 equality duty child friendly consultation material should have been prepared alongside the original draft PfG document and published at the outset of the consultation period.

Given the delay in the production of a child friendly consultation document we would strongly recommend that the consultation period is extended to facilitate real and meaningful direct engagement with children and young people including those children and young people across the section 75 equality categories.

We would ask for information and details of the arrangements made by the Executive to carry out direct engagement with children and young people on the draft PfG. Where engagement has occurred we would ask that the outcome of this engagement is published, with an indication of how the Executive intends to respond to and act on the views from children and young people.

## EQUALITY IMPACT ASSESSMENT

Contrary to the view expressed in the EQIA consultation document it does not appear that the EQIA has been undertaken simultaneously with the development of the PfG given that the EQIA consultation document was published five weeks from the PFG consultation deadline and on the basis that views would need to be submitted within this timeframe in order to actually inform PfG. This is entirely unsatisfactory and contrary to obligations in respect of the section 75 duty to promote equality of opportunity.

For the purposes of accurately and comprehensively informing EQIA processes, including that of the PfG and Budget, there is an urgent need for concerted efforts by Government to develop and put in place a data gathering system that can collate a range of disaggregated information on the lives of children and young people. In particular it is imperative that any system include specific information on small populations of children and young people whose experience is of multiple disadvantage and discrimination and who therefore will require specific focus and attention from Government to ensure they can access and benefit from universal public services as well as specific and targeted interventions that can meet their particular needs.

## CONCLUSION

CiNI trusts this submission can usefully inform the ongoing development of the Executive's PfG. We look forward to receiving a summary of responses to the consultation which addresses the issues raised in this submission. At this point we would ask for information on the system that will be used to analyse the responses including the degree of weight which will be given to individual and group based responses. This is essential in securing transparency and advancing the promotion of equality of opportunity, ensuring that particularly marginalised and disadvantaged individuals and groups have their voices heard.

As we have indicated we are particularly interested in engaging with, informing and supporting the development of departmental delivery plans. Again the delivery framework will be critical to this process and must be open to stakeholder input. We would ask that the Executive provide a timeline for these processes and outline how it intends to take forward direct engagement with stakeholders, including children and young people, on the development of the delivery plans.

#### Appendix – CiNI Consultation Workshop Attendees (19.01.12)

- Action for Children
- AFASIC
- Ballynahinch Sure Start
- Dry Arch Family Centre
- Early Years
- Family Care Society
- Gingerbread
- HSCB
- Include Youth
- Integrated Services for CYP
- Lifestart Foundation
- Newstart
- NI Cancer Fund for Children
- NICVA
- Opportunity Youth
- Parenting NI
- RASDN – Belfast Reference Group
- Save the Children
- Voypic
- Womens Support Network



## CITB–ConstructionSkills



CITB–ConstructionSkills NI Response to the Draft Programme for Government

February 2012

### Introduction

CITB–ConstructionSkills NI combines the activities of the Construction Industry Training Board (NI) and ConstructionSkills in Northern Ireland (the Sector Skills Council for Construction). Our purpose is to develop and embed a training culture which will improve the skills and productivity of the Northern Ireland construction industry. Our role is to encourage the adequate training of those employed or intending to be employed in the construction industry and to improve the skills and productivity of the industry, to deliver a safe, professional and fully qualified workforce across the whole of the construction industry in Northern Ireland.

### Aim of the Paper

The aim of this paper is to outline to the response of CITB–ConstructionSkills NI to the Draft Programme for Government. In this paper key commitments outlined in the Draft Programme for Government have been listed and the organisational response to these specific commitments detailed.

### Key Commitments Relating to Skills

#### Commitment

*Increase the uptake of STEM places.*

#### CITB–ConstructionSkills NI Response

3.1 CITB–ConstructionSkills NI has worked cross-sectorally with the Built Environment Sector Skills Councils (supported by DEL) to promote STEM. Going forward the organisation supports any further initiatives to increase the uptake of STEM subjects.

#### Commitments

*Upskill the working age population by delivering 210,000 qualifications at Levels 2,3,4 and above through FE/HE, Essential Skills and Training.*

*Support people (with an emphasis on young people) in to employment by providing skills and training.*

#### CITB–ConstructionSkills NI Response



4.1 CITB-ConstructionSkills NI, in partnership with the Joint Council for Building and Civil Engineering are currently working on a pilot project funded by DEL. Upon completion this 'Qualifying the Existing Workforce' Project (QEW) will have qualified 500 experienced, employed but unqualified construction workers at Level 2. It is our firm belief that within adequate funding this model has the potential to be rolled out across the whole of the Built Environment and that this current partnership is best placed to deliver it.

4.2 As an organisation we fully support the upskilling of construction employees and our research has identified key training needs are Management and Leadership; Essential Skills; Modern Methods of Construction and Low Carbon; and Business Development and we welcome all Government initiatives to address these needs.

4.3 An immediate challenge to facilitate successful completion of apprenticeships and other qualifications in the construction industry is the ability to allow each learner sufficient work experience. With the construction industry in Northern Ireland in its current state of decline there are limited opportunities for young people to undertake the required work experience and gain construction related qualifications. It is our belief that significant Government investment is needed to provide simulated work experience in order to allow the working age population the opportunity to complete training and achieve construction related qualifications.

4.4 CITB-ConstructionSkills NI has the expertise and facilities on site that would enable such simulated work experience to be undertaken and construction related qualifications to be delivered. With adequate resources this would help to ensure that our working age population are fully skilled in preparation for the upturn.

4.5 CITB-ConstructionSkills NI runs a successful Undergraduate Development Programme. This programme provides the basic skills employers are looking for in graduate level new entrants. However, like the apprenticeships, undergraduates cannot get placements that provide the appropriate level of skills and therefore need to leave the country to gain experience. It is our belief that with adequate resources CITB-ConstructionSkills NI could develop a full programme of simulated work experience tailored for construction related undergraduates that would be acceptable to industry and improve employability of graduates.

## Commitment

*Improve literacy and numeracy levels among all school leavers, with additional resources targeted at geographical areas of educational under achievement.*

## CITB-ConstructionSkills NI Response

5.1 Numeracy, Literacy and ICT Essential Skills are requirements for the successful completion of all construction related qualifications. This provides a challenge to many young new entrants to the industry which has to be addressed as part of the Apprenticeship Framework. The industry's view is that young people should have qualifications in these areas prior to taking up a construction related apprenticeship. CITB-ConstructionSkills NI have developed a suite of training materials to support Essential Skills in Numeracy and Literacy (ICT is currently under

development) which are tailored to construction. These resources go some way to ease the concerns of the industry that young apprentices are undertaking training that will relate to their future role in the industry and it is our belief that this material should form part of a compulsory curriculum and be available to all young people entering construction related training.

5.2 CITB-ConstructionSkills NI recently ran a pilot study with the Northern Regional College (NRC) and a local secondary school to deliver Essential Skills training to young people in school. The young people were studying Occupational Studies at NRC and as a result of involvement in the pilot also achieved Level 2 Essential Skills qualifications in literacy. Due to lack of resources we have been unable to further support this form of learning but our successful pilot highlights that this option could be further developed. This has the potential to increase the number of young people who leave school with an Essential Skills qualification in numeracy, literacy and ICT that is recognised by the construction industry.

#### Commitment

*Ensure there are no increases in student fees beyond the rate of inflation for NI students studying here.*

#### CITB-ConstructionSkills NI Response

6.1 CITB-ConstructionSkills NI welcomes the commitment to keep the student fees at current levels.

#### Key Commitments Relating to the Construction Industry

*The following points outline the key commitments relating to the construction industry and it can be seen that the full CITB-ConstructionSkills NI footprint is covered.*

*Develop the 'One Plan' for the regeneration of Derry/Londonderry;*

*Progress the upgrade of key road projects and improve the overall road network;*

*Substantially complete the construction of the new Police, Prison and Fire Training College;*

*Upgrade the Coleraine to Derry/Londonderry railway line;*

*Invest £600m in water and sewerage infrastructure;*

*Develop stadiums as agreed with the IFA, GAA and Ulster Rugby;*

*Develop Maze/Long Kesh as a regeneration site of regional significance;*

*Deliver 30 schemes to improve landscapes in public areas;*

*Provide £40m to address dereliction and promote investment in the physical regeneration of deprived areas;*

*Significantly progress work on the plan for the Lisanelly Shared Education campus as a key regeneration project;*

*Encourage industry to achieve 20% of electricity consumption from renewable electricity and 4% renewable heat by 2015;*

*Reduce the environmental impacts from the waste we generate;*

*Ensure 90% of large scale investment planning decisions are made within 6 months and applications with job creation potential are given additional weight;*

*Deliver 8000 social and affordable homes;*

*Improve thermal efficiency of Housing Executive stock and ensure full double glazing in its properties;*

*Include social clauses in public procurement contracts for supplies, services and construction.*

#### CITB-ConstructionSkills NI Response

7.1 Recent Labour Market Intelligence reports highlight the devastating impact that the downturn has had on construction in Northern Ireland (31% peak to trough fall in output compared with a UK average of 16%) and employment in the industry has fallen by 23% from its peak in 2007. ConstructionSkills research has also shown that every £1 spent in the construction industry generate £2.84 of economic activity and highlights the importance of the sector to the recovery of the economy in Northern Ireland. Therefore CITB-ConstructionSkills NI welcomes all Government initiatives to support the construction sector in Northern Ireland.

7.2 Some of the proposed schemes outlined above raise a number of key training needs especially in relation to low carbon / sustainability. CITB-ConstructionSkills NI has an ongoing strategy to assist the construction industry to upskill in order to meet the challenges posed by the introduction of renewable energy technologies, retrofitting to meet low carbon targets and so on. This includes business improvement seminars focusing on sustainable construction, retrofitting and waste management; working with other Built Environment Sector Skills Councils to develop qualification frameworks, qualifications and to deliver training. We are also working with our employer associations to deliver training in sustainable construction through our grants scheme.

7.3 As part of our on going sustainability strategy we are currently in the process of investigating a bid for European 'Leonardo' Funding. If successful we will deliver a sustainable building training programme to local employers in conjunction with German training providers, who are recognised to be world leaders in the field of sustainable construction. As a result of this work CITB-ConstructionSkills NI are best placed to support and deliver any upskilling that will be required for those working in the construction industry in Northern Ireland.

7.4 In this PfG there is an opportunity for Social Responsibility Clauses to be improved upon and enforced. For example training could become a compulsory element of the contract not 'desirable' and as a NDPB, CITB-Construction Skills NI can work with the construction industry in Northern Ireland to help deliver these training commitments whilst supporting Government to ensure that they are delivered.

## Citizens Advice



**Draft Programme for Government 2011 – 2015**

***Building a Better Future***

**February 2012**

### 1. Introduction

Citizens Advice is the largest advice charity in Northern Ireland working against poverty, meeting the information and advice needs of some 90,000 people per year and dealing with over 326,000 issues on behalf of its clients. Benefit queries continue to be the single largest area of work accounting for over 55.8% of total issues dealt with by advisers, followed by debt at 19.8% and employment at 6%. The increasingly complex nature of work undertaken by the organisation reflects the effects of welfare changes, squeezing of household budgets and reductions in working hours on our clients during the current economic crisis.

The service is delivered through an unrivalled network of 27 local offices and 100 other outlets. We have a physical presence in 22 council areas around Northern Ireland. Online services have increasingly become a major priority for the organisation, as we seek to meet the changing needs of clients and growing demand for such advice and information. In 2010/11, we met over 142,000 electronic requests for information. This is expected to remain an area of growth in demand alongside our face to face services.

We work in partnership with a number of statutory, voluntary and community bodies on a range of programmes and projects. Some of our major partnerships include;

The 'Dealing with Debt' project provided on behalf of DETI

The Macmillan Cancer Welfare Rights Service

The 'Beat the Recession' project funded by Big Lottery

The Royal British Legion/RAFBL Benefits and Money Advice service

The Money Active project supported by Nationwide Building Society.

These are in addition to a range of local initiatives undertaken by our member bureaux. This extensive service is delivered within a budget of £6 million. It is in part funded by our social economy trading arm, Citizens Advice Services Ltd.

Citizens Advice Northern Ireland has formal links to National Citizens Advice in England and Wales and close working relationships with Citizens Advice Scotland (CAS). Together the three associations constitute the largest advice network in

Europe, with over 60 years experience of providing advice and information to the public. Citizens Advice also works in partnership with the Citizens Information Board in the Republic of Ireland to provide cross border advice and information.

The CAB network is very finely tuned to the targeting of social need and, with its regional spread, modern integrated IT infrastructure and skilled staff, represents an efficient and cost effective channel for the delivery of information and advice to the most socially vulnerable people in Northern Ireland.

## 2. Access, Inclusiveness and Principles

Advice is provided on a huge range of issues by trained, specialist advisers from 27 main offices and from some 100 other outlets. Our services are delivered by a cohort of staff and volunteers to clients from across the entire community, particularly to more vulnerable people in our society.

The advice is delivered with the framework of four key principles:

- free;
- impartial;
- confidential; and
- independent.

To ensure that advice and information are as accessible to as many people as possible the services of Citizens Advice are available through local CAB offices, online at [www.adviceguide.org.uk](http://www.adviceguide.org.uk), by e-mail, by telephone and in many community venues such as health centres, hospitals and community centres.

In 2012, we launched a pilot text advice service in the North East area with assistance from the Innovation Fund. As part of the Beat the Recession project, we offer online chat services which are increasing in popularity.

In addition, the majority of CAB offices also provide home visits for those who are unable to access their local office due to health problems.

## 3. Advice as an Economic Driver

Citizens Advice provides advice across a range of topics to clients on a range of issues, including benefits, debt, personal finance, consumer issues, employment, housing and other matters. As well as being an essential service to the community, this work is also essential to a successful economy. To take a few examples:

Our work on benefits advice helps to draw down money to the NI economy from Treasury, increasing low income households' budgets and spending in disadvantaged areas

Our delivery of the DETI-funded 'Dealing With Debt' project *inter alia* helps people in various ways including minimising excessive interest payments (which releases funds for productive spending) and reduces the levels of house repossessions (thereby preventing added burden on the social housing list)

Our advice to employees on workplace rights helps to prevent disputes escalating to Tribunal or court stage, which aids productivity levels and reduces pressure on the Courts & Tribunals Service

Our advice services help people to overcome difficult and distressful situations, which has a positive impact on their well-being and reduces costs to the HSC services

Our money advice services help people to secure a firmer financial footing, which helps build the skills set from which potential entrepreneurs can launch

Citizens Advice supports the objective of maximising the number of working age people in employment, ensuring that proper financial and other supports are available to everyone who needs it to stay in work, to secure work or who cannot participate in the workforce. The provision of high quality, accessible and independent advice is essential to meeting this aim.

Amongst other functions, it empowers people to put themselves on a better financial footing by maximising their benefits income, it assists people to overcome their debt issues and therefore prepare themselves emotionally and fiscally for work or entrepreneurship and it provides people with confidence that they can manage employment by the availability of independent advice on work problems.

*Recommendation:*

Invest in quality, independent, free at delivery advice services to tackle disadvantage, address isolation and encourage economic participation

#### 4. Delivering Advice in the Digital Economy

The explosion of broadband penetration over recent years has brought huge benefits to people including through more accessible information, more consumer choice and value as well as educational tools for learners. Northern Ireland now boasts 100% broadband coverage as well as superfast connections and network resilience to the North America via Project Kelvin. However, for many people in our community broadband remains a cable that only passes by their home.

Increasingly, access to employment is dependent on computer skills and connectivity, and people with ICT skills have higher average earnings than others. An internet user will on average earn £8,300 more than someone who is not (source – Manifesto for a Networked Nation). Children with access to the internet have better educational prospects and resultant employment prospects. Consumers with internet access save over £500 per annum through online discounts and better deals.

Digital exclusion is often perceived as an age-related issue, with frequent references to ‘silver surfers’ as barrier breakers. However, income is a vital determinant of online access. We know that practically all people earning over £41,600 or who have a degree use the internet. Conversely, over half of people earning under £11,



500 or who have no formal qualifications cannot use the web. The “Digital Divide” is a mirror of our financial divide.

DWP has recently announced that the Universal Credit will be the first benefit to be “digital by default”. Similarly, other government services are increasingly online including through NI Direct. While this can provide efficiencies and savings for government, as well as advantages for many citizens, there is a real danger of further disadvantaging lower income people in our society. The Department of Finance & Personnel’s digital inclusion target for 2014 would still see 22% of citizens outside this digital loop, and these will likely be amongst the most vulnerable.

It is therefore vital that the Northern Ireland Executive expands digital inclusion efforts and invests in the provision of advice services to assist citizens facing the challenges of online benefits administration and digitisation of other public services.

*Recommendation:*

Ensure internet access and online services will be available at home or via accessible centres (e.g. advice providers) for 100% of the population by 2014

## 5.1 Welfare Reform

Citizens Advice favours progressive reform of the welfare system in order to provide a modern system of flexible state support to help people engage in the labour market where possible and to support people properly when they cannot. Unfortunately, we are witnessing a wave of major change at Westminster which appears to use the pretence of incentivising work as a cloak to disguise pre-determined cuts to many (already low) incomes, removal of supports to many people in need and the securing of expenditure cuts dressed up as reform.

Citizens Advice has already dealt with a significant increase in queries on changes to benefits entitlements over recent months and years, including (for example) the migration of people from Incapacity Benefit to Employment Support Allowance (ESA) and the reduction of Mortgage Interest Support rates. Similarly, it is anticipated that migration from DLA to the Personal Independence Payment (PIP), expected next year, will mirror the case increase of the former. These are over and above the normal volume of enquiries which the CAB network would deal with. It is important that proper measures are put in place to ensure that the likely surge in enquiries to advice providers over the next two years – particularly caused by the introduction of Universal Credit in 2013 – is adequately resourced.

## 5.2 The Drain of Welfare Reform on Regional Economy

The introduction of the main provisions of the Welfare Reform Bill, currently making its way through the Westminster Parliament, to Northern Ireland would have profoundly detrimental effects here. It would, in the first instance, affect the incomes of many poorer households in the region including many children already living in poverty. However, it would also have a huge cumulative impact on the Northern Ireland economy through an estimated £500 million being removed from the regional economy (source – NI Assembly Research Unit). This will have a higher impact here

than in other regions of the UK given the disproportionately high number of people reliant on benefits here. That graph is further distorted by the fact that the segments of claimants targeted by the welfare reform cuts, including disabled people and families with children, constitute a larger part of the population here.

This would take effect at a time when domestic consumption is already low. Northern Ireland has an unusually high level of public sector economic activity, including reliance on public sector employment. Reductions in general public spending will have a wider impact on the local economy, while restrictions in public sector wages will also add to the financial contraction caused by cuts.

*Recommendation:*

Robustly examine and pursue alternatives to and mitigation of welfare cuts

## 6. Social Investment Fund

Citizens Advice strongly advocates that the Social Investment Fund should focus on reducing poverty and unemployment. The provision of advice in the building of personal capacity could be a productive aspect of such a programme.

Citizens Advice would propose that advice and representation on social security and debt are key areas that should be included in the social investment fund options. These areas are strongly linked to poverty and income maximisation for the socially and economically marginalised areas proposed.

On reflection the partnership delivery options should explicitly include the voluntary sector. Also, given the current fiscal constraints and emphasis on value for money; organisations with existing programme capacity and partnership activities should be utilised before setting up new delivery mechanisms.

Citizens Advice believes that social investment should not be predicated on someone's geographical location and would urge that the fund also addresses the needs of marginalised individuals not living within geographically defined social fund areas. The issue of fuel poverty, which blights individuals and families spread throughout Northern Ireland, is an example of an area of worthy potential social investment which should not be entirely determined and restricted by geography.

Under the theme of self-help, Citizens Advice would advocate an increased profile for volunteering and self- help signposting. Giving communities the skills and knowledge to deal with benefit, debt and consumer issues would improve social capacity and directly improve their economic capabilities to allow them to engage in wider community issues.

Citizens Advice welcomes the inclusion of financial training and would encourage specific consideration of financial capability and money management training as part of capacity building. Group workshops on assessing need for financial guidance and assistance would also be a useful aspect of capacity building.

We believe that enhancing and stimulating partnerships between communities and voluntary organisations which serve them would be a useful contribution to social capital and the objectives of the fund as well as an investment in sustainability for marginalised communities.

*Recommendation:*

Maximise potential advantages by using existing voluntary sector providers and advice services in delivery models for the Social Investment Fund

## 7. Social Protection Fund

Citizens Advice recognises the potential that the Social Protection Fund may have to alleviate the worst effects of welfare reform and to introduce Northern Ireland engineered programmes to tackle poverty and disadvantage. The provision of the Fuel Allowance initiative, which followed a recommendation to target such groups by Citizens Advice in September 2011, provided a clear instance of where devolution was able to fill a void left by Westminster cuts. However, such a task would require a much higher annual commitment than is presently provided for as well as a planned commitment to maintain or increase that figure year on year over the course of the Assembly term and beyond.

In the roll-out of any such multi-annual programme, Citizens Advice believes that the essential role of advice in helping people facing poverty, disadvantage and social exclusion should be recognised as an effective and good value means of helping to lift people out of social and economic distress.

*Recommendation:*

Commit to a multi-annual budget programme and strategy for delivery of this fund's objectives and increase financial allocations to the fund until 2015 with contingency planning for extension into the next Assembly term

### 8.1 Labour Market Issues

Citizens Advice recognises that the best path out of poverty for those who are able to work is to be in meaningful employment. This enhances income prospects, but also reduces mental health issues, relationship distress and enables social mobility.

Unfortunately, since 2008 people of working age in Northern Ireland have faced the twin challenges of unemployment and underemployment. As has been well documented, the former has particularly affected sectors such as construction. There are twin pressures of flexibility present. The dominant one is from employers' organisations seeking added flexibility in terms of a reduction of employment rights. Citizens Advice believes that periods of economic contraction, as we are currently experiencing, demand protection of hard-won rights rather than their demolition.

### 8.2 Interaction of Social Security and Labour Market

Similarly, however, there is a need to provide for more flexibility around the social security system to ensure that people are not penalised either for being on benefits or for taking up whatever work is available. Citizens Advice agrees with the principle of providing people who are out of work with the support to bridge back to employment. This should not, however, be used as a premise to force people who are unable to work into employment nor to enable unscrupulous employers to secure subsidised labour and thereby undermine employees' rights and deprive workers of the opportunity to secure properly paid posts.

### 8.3 Labour Market Openness

The current downturn presents major difficulties to people trying to re-enter the labour market. Contrary to much comment from the UK coalition government in justifying its approach to welfare reform, those obstacles are not welfare-system focused. In contrast, they include;

- Childcare availability
- Childcare affordability
- Low educational attainment; functional illiteracy and innumeracy
- Lack of relevant skills for job openings, and
- Absence of relevant work experience

Citizens Advice recognises the effort that has been put into the NEETS Inquiry by the Assembly and hopes to see fruition on its objectives through an inter-departmental approach. However, issues of labour exclusion and underemployment at present extend to skilled, graduate and postgraduate level people. These issues must be also addressed by robust interventions.

### 9. Childcare

The availability and affordability of childcare in Northern Ireland presents a major barrier to employment, particularly for younger women in our community. Northern Ireland has one of the lowest average household incomes in the UK yet it also has one of the highest costs of childcare.

Its economic consequences are also felt in increased levels of debt and financial hardship by low income working families, faced with exorbitant childcare fees to maintain work. This situation has been exacerbated by the absence of a statutory duty to provide childcare, as has prevailed in Great Britain.

#### *Recommendation:*

Citizens Advice believes that roll out of a comprehensive Childcare Strategy, to deliver accessible and affordable childcare, and a correlating Action Plan must be a top priority during this Assembly term.

### 10. Fuel Poverty

Fuel poverty is a major challenge facing our community, with its worst effects faced by the most vulnerable including older people, disabled people and families with

children. In September 2011, Citizens Advice produced a report entitled “A Cold House for Everyone?” which set out evidence gathered from our network and made recommendations for action.

Citizens Advice welcomes the additional Fuel Allowance this year as a first step in addressing this problem. We also acknowledge the priority which the Assembly’s Social Development Committee has given to the issue. The exploration of a pilot energy brokering scheme by the Department is an encouraging sign towards securing our report’s recommendations. These should be pursued in greater depth and with rigour.

Our research found *inter alia* that 77% of CAB clients had been forced to ration the heat which they use. Amongst older clients, 30% had to choose between heat and other essentials such as food. This figure rose to 59% within our disabled client base. Half of those disabled or sick clients had to borrow from the Social Fund to pay their energy bills.

The shortage of social housing has increased demand for private rental properties amongst lower income households. There is little incentive at present for landlords to invest in energy efficiency measures. It would be helpful for government to consider implementing a minimum energy rating requirement and promote the Landlords Energy Savings Allowance.

Fuel poverty not only affects people’s comfort, health and well-being but also impacts significantly on their financial situation, adding to poverty in our society.

#### *Recommendations:*

While we have had a mild winter in 2011/12, the Northern Ireland Executive should take immediate and well-resourced steps to address this issue, including in the following areas;

- Improving uptake of Warm Homes and extend eligibility of Warm Homes Plus
- Extending energy brokering across the region
- Tackling Energy Inefficiency in the private sector
- Creating ways for people to better manage payments

## 11. Housing

Citizens Advice believes that investment in social housing should be a top priority for the Northern Ireland Executive as it delivers numerous public policy benefits to our community;

It obviously delivers quality accommodation to people who are in housing need, including homeless people

This helps to address social disadvantage as people in need of social housing are overwhelmingly on low household income levels

Social housing improves the housing stock and, through better insulation and modern heating systems, helps to address the blight of fuel poverty

Better energy efficiency results in environmental sustainability advantages through lower energy demand and lower carbon emissions

Construction, improvement and maintenance of housing stock offers employment, which is notably needed in the construction industry.

Citizens Advice believes that the target of 8,000 social housing builds over the period is too low, particularly given that 2,000 of these will leave the social housing sector as affordable (i.e. built-to-be-privatised) dwellings. It is estimated that 2,500 new build units are required on stream each year to meet demand for social housing in Northern Ireland, which provides a figure of 10,000 homes excluding affordable units.

Furthermore, Citizens Advice anticipates that changes to welfare provisions, especially around housing benefit entitlement and rates, will likely result in changes or additions to demand profiles. For example, it is reasonable to anticipate that the extension of shared room rate Housing Benefit to under 35s will increase demand for single room accommodation and places in Houses of Multiple Occupation (HMOs).

*Recommendation:*

Increase targeted new social housing build to 10, 000 homes over the programme period (not including affordable housing units) and monitor demand rates and patterns in light of benefits changes and economic trends

## 12. Debt

Citizens Advice 'Dealing with Debt' funded Money Advice service is in its fifth year of providing Money and Debt advice which is free at point of access and independent of financial product providers.

In the year 2010/11 this project dealt with over £37 million of debt and helped 2,500 clients with their debt problems. Together, the top five debt categories (Mortgages, Credit Cards, Personal Loans, Secured Loans and Bank Loans) make up almost 80% of the debt profile.

'Dealing with Debt' figures in 2010/11 and the first three quarters of 2011/12 show that credit card debt is down, due to more stringent checks for credit referencing and the allocation of credit cards, and also a trend in falling consumer spending generally.

Figures for Mortgage debt show a vast increase from pre-recession debts of 1,785.82% to £9,038,508 in 2010/11. In part this is the consequence of peak-of-market house prices and interest rates. However this increase in debt highlights the fragile nature of many mortgages which could be in difficulty subject to any small increase in the Bank of England interest rate. 'Dealing with Debt' figures also show



increasing totals of mortgage arrears and evidence that some lenders are allowing extended periods prior to initiating possession proceedings.

In December 2011, the first Time Order in Northern Ireland was granted by the Courts Service in respect of mortgage arrears, extending the repayment scheme to smaller repayments over a twenty year period. Citizens Advice welcomes the development and in consideration of clients' efforts to maintain payments fitting to their circumstances, suggests this solution could be widely implemented.

Citizens Advice welcomes the Department of Work and Pensions consultation on the Support for Mortgage Interest scheme. In particular, proposals to amend the single interest rate and payments equal to the claimants' contractual interest rate subject to a cap may help young homeowners where they are briefly out of work. Although demand for mortgages is still low, the co-ownership scheme and increased affordability of mortgages may increase access to the housing market for first time buyers.

*Recommendation:*

Increase investment in free debt advice and develop a financial capability strategy to reduce incidence and scale of future debt and money difficulties

### 13. Rural Isolation

Citizens Advice is keenly aware of the particular problems faced by rural dwellers, including restricted employment opportunities, high transport costs for everyday tasks and higher incidence of social isolation. Fuel poverty is a particular problem in rural locations. It is essential that we maintain healthy and vibrant rural communities to sustain and support vulnerable sections of our community there.

In addition to targeted interventions, which should include provision of quality independent advice to rural dwellers tailored to their needs, we need to ensure joined up approaches are pursued. For example, low paid workers are unlikely to travel more than 10kms to work. We therefore need to ensure that planning, transport and investment activities are coordinated to maximise opportunities for everyone in rural areas to access employment.

This is vital to avoid population flight by aspirational rural dwellers to our cities accompanied by increasing marginalisation, labour market exclusion and benefit dependence by remaining residents.

Such displacement will be compounded by the effects of changes to housing benefit. For example, recent changes which will force people under 35 into shared accommodation will have the likely effect in Northern Ireland of forcing many more young people to move to larger towns and cities. This is because places like Belfast, Derry/Londonderry and the Coleraine area have a stock of HMO dwellings which is not available in many smaller villages and towns.

*Recommendation:*



Ensure that comprehensive inter-departmental strategies and actions are in place to ensure the future viability, prosperity and well-being of rural communities

#### 14. Social Economy

Citizens Advice contributes to the social economy through its trading arm Citizens Advice Services. This relationship exists to share the expertise and skills, which Citizens Advice possesses, with the wider community and economy while maximising commercial realisation of those assets. It is a key underpinning of our sustainability model.

The draft NI Executive Economic Strategy asserts that the contraction in public sector spending will put the onus on the private, community and voluntary sectors to deliver economic growth. It is difficult to envisage how the social economy as a whole can vigorously pursue an expansionist economic course in light of the announced cuts to public sector assistance to date. In contrast, the 'Big Society' concept in Britain has given way to some positive ideas in this regard, such as the contracting out of the DirectGov service to Citizens Advice (GB).

The limited introduction of social clauses in public procurement contracts in recent years has been a positive development. However, the concept of social procurement needs to be expanded to include a proper strategy and plan for ensuring that government officials understand how to engage better with social economy bidders. Similarly, further investment should take place into the voluntary sector to mirror efforts made in Britain to develop capacity for responding to tenders.

Such approaches can secure for public benefit the high quality and good value for money which voluntary sector organisations can offer. This advantage is then married with increased sustainability for the voluntary sector, which is a stated aim of the draft strategy.

#### *Recommendation:*

Increased pursuit of contracting out public services to social economy entities and voluntary sector organisations and support for social economy expansion through R&D, entrepreneurship and skills development

#### 15. Sustainability

As outlined above, Citizens Advice is committed to the principle of sustainability. We believe that this concept should not be limited to environmental interpretation alone. Actions by government, private sector bodies and the community and voluntary sectors should be economically as sustainable as well. The economic contraction which we are currently experiencing is the consequence of a response to unsustainable boom and bust business activities, driven by a reckless and unregulated business sector.

A holistic interpretation of sustainability should also reflect the importance of social sustainability of public programme planning. The example cited above of social

housing as a response to fuel poverty is a prime example of an integration of these principles in one approach.

*Recommendation:*

The Programme for Government and all cascaded strategies and actions should encapsulate the conjoined sustainability principles of economic, environmental and social sustainability.

## 16. Review of Public Administration

Citizens Advice is keen to see the modernisation programme which RPA in local government will bring and hope that this will result in more responsive services to local communities. In particular, Citizens Advice is keen to see the implementation of Community Planning, which has delivered significant innovation in Scotland in terms of joined-up and coordinated decision-making and service delivery in local areas including CAB.

Aside from the lost opportunities that delay has brought, the uncertainty and delay in roll-out of local government reform is itself an obstacle to best business planning for the voluntary sector. Citizens Advice wishes to see certainty and delivery of planned council amalgamations by 2015 so that remaining changes to our own network structures and administration can be honed and implemented.

Citizens Advice suggests that any transitional period should include shadow implementation of Community Planning structures and practices. For example, responses to severe cold weather spells in the years prior to 2015 would be improved significantly if community planning approaches were deployed. For example, innovative approaches such as using school premises or leisure centres as 'Warm Centres' or distribution points would enhance effectiveness, lower costs and tackle isolation.

In respect of our core activity of advice provision (and otherwise), Citizens Advice hopes that RPA will result in enhanced cooperation between local administration of advice support with central (regional) coordination of programmes and strategies. It is essential that all councils have a duty to fund advice so that variations in quality of advice or funding levels for its provision under the new regime are avoided. We look forward to engaging with government in respect of these plans.

*Recommendation:*

Move speedily to agreement and roll-out of local government reconfiguration accompanied by coordinated and binding requirements on funding and support for local advice services on the new super-councils

## 17. Equality and Poverty

Citizens Advice believes that the Programme for Government should be fully tested against potential adverse impact on the Section 75 grounds. All appropriate mitigation should be set in play against such costs. Moreover, every action resulting

from the Programme should actively consider how the promotion of equality of opportunity can be advanced and vulnerable groups assisted.

The Institute for Fiscal Studies has highlighted the disproportionate burden carried by women in the loss of employment during the economic crisis since 2008. This adverse impact is set to potentially worsen with the impact of further welfare reform measures, not least through the proposed single household payment concept.

Such a regressive measure would represent a major transfer of resources away from women to men and would undo much of the progress of the past generation. This and other measures should be rejected by government in Northern Ireland.

Across a range of indicators, it is also evident that disabled people face additional burdens and barriers to participation in society over the duration of this Assembly (e.g. high levels of digital exclusion and severe projected cuts to incomes via welfare reform). For this and other reasons, it is vital that a thorough EQIA is developed with a focused and rigorous assessment on each of the s75 groups taking into account all the anticipated developments over the relevant period.

Citizens Advice welcomes the commitment to extend anti-discrimination legislation to cover goods, facilities and services on the basis of age, although ideally such provision could be implemented sooner than 2014-15. However, we would prefer to see the adoption of a comprehensive Single Equality Bill as a means of simplifying the law and delivering equality across all sectors of person in our community.

*Recommendation:*

Ensure vigorous, impact-driven implantation of equality promotion across the Programme for Government and its manifestations and deliver a Single Equality Bill

## 18. Cohesion, Sharing and Integration

Citizens Advice prides itself on its commitment to providing a neutral and inclusive service to the whole community. During the Troubles, Citizens Advice Bureaux remained one of the few facilities in every part of Northern Ireland that involved people from across the community and that attracted clients of all backgrounds.

Citizens Advice wishes to see a Northern Ireland where we develop a properly integrated society which respects the diversity and identities of everyone who lives here. The twinned approach of legislation and intervention support pursued in the fair employment sphere demonstrates what can be achieved. Our workplaces are the truly integrated shared spaces in our society. This path needs to be followed and widened to other aspects of life.

We therefore wish to see a robust Cohesion, Sharing and Integration strategy agreed and delivered which will tackle the division that continues in housing, education, leisure and other dimensions of life in our region.

### *Recommendation:*

That the Executive agree a robust Cohesion, Sharing and Integration strategy in concert with civic society which will robustly deliver sharing across public policy priorities including housing, education, leisure and other parts of life in our region

### Summary of Recommendations

- Invest in quality, independent, free at delivery advice services to tackle disadvantage, address isolation and encourage economic participation
- Ensure internet access and online services will be available at home or via accessible centres (e.g. advice providers) for 100% of the population by 2014
- Robustly examine and pursue alternatives to and mitigation of welfare cuts
- Maximise potential advantages by using existing voluntary sector providers and advice services in delivery models for the Social Investment Fund
- Commit to a multi-annual budget programme and strategy for delivery of this fund's objectives and increase financial allocations to the fund until 2015 with contingency planning for extension into the next Assembly term
- Citizens Advice believes that roll out of a comprehensive Childcare Strategy, to deliver accessible and affordable childcare, and a correlating Action Plan must be a top priority during this Assembly term
- Improving uptake of Warm Homes and extend eligibility of Warm Homes Plus
- Extending energy brokering across the region
- Tackling Energy Inefficiency in the private sector
- Creating ways for people to better manage payments
- Increase targeted new social housing build to 10, 000 homes over the programme period (not including affordable housing units) and monitor demand rates and patterns in light of benefits changes and economic trends
- Increase investment in free debt advice and develop a financial capability strategy to reduce incidence and scale of future debt and money difficulties
- Ensure that comprehensive inter-departmental strategies and actions are in place to ensure the future viability, prosperity and well-being of rural communities
- Increased pursuit of contracting out public services to social economy entities and voluntary sector organisations and support for social economy expansion through R&D, entrepreneurship and skills development
- The Programme for Government and all cascaded strategies and actions should encapsulate the conjoined sustainability principles of economic, environmental and social sustainability
- Move speedily to agreement and roll-out of local government reconfiguration accompanied by coordinated and binding requirements on funding and support for local advice services on the new super-councils
- Ensure vigorous, impact-driven implantation of equality promotion across the Programme for Government and its manifestations and deliver a Single Equality Bill
- That the Executive agree a robust Cohesion, Sharing and Integration strategy in concert with civic society which will robustly deliver sharing across public policy priorities including housing, education, leisure and other parts of life in our region.

## Close E

This is my response to the consultation on the Draft Programme for Government (PfG) 2011–2015.

I am concerned that the Draft PfG lacks an overall vision and is light on key commitments for the natural environment. I believe that the Assembly needs to show the spirit and vision that is needed to make Northern Ireland a leader in sustainability and an example of what local democracy can achieve.

There is an intense focus in the PfG upon growing the economy but this should not be at the expense of the natural environment. Indeed, a healthy environment directly contributes towards a healthy economy – sustainable tourism and creation of the jobs needed to deliver a low carbon economy, are just two examples.

Whilst there are some good things in the Draft PfG, such as a revised Biodiversity Strategy and an Invasive Species Strategy, the document fails to put in place measures to help deliver them. In addition, there a number of significant gaps in the document that must be filled. I ask that the following targets are included in the PfG:

- A Northern Ireland Climate Change Act, with tangible emissions reduction targets for each sector. Currently we are 99% reliant on increasingly expensive imported energy. If we move to a low-carbon economy with a thriving renewable energy sector our energy supply will be secure, and we will have created thousands of new jobs and attracted major investment. Committing to a Climate Change Act would help us deliver this low-carbon economy.
- The creation of an independent environmental protection agency. This would act as a champion for sustainability and environmental protection, and prevent costly indecision and slow action on safeguarding our environment which leaves Northern Ireland taxpayers repeatedly exposed to the risk of enormous fines for breach of EU environmental law.
- A Northern Ireland Marine Act which ensures a framework for healthy seas and protection for a range of marine species.
- A reformed planning system with sustainability at its heart. I want to see a planning system that can help deliver a thriving economy whilst protecting our natural, built and cultural heritage. All development must be truly sustainable and promote long-term societal benefits, and deliver improved health and wellbeing.
- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of halting biodiversity decline and they also provide a range of other benefits including helping support rural communities by providing financial support to farmers and creating significant socio-economic benefits.

Finally, I want the Assembly to ‘Step Up for Nature’ by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely E Close

## Coalition against Water Charges

15 February 2012

Draft Programme for Government 2011-15

Water Charges / NI Water



The Coalition against Water Charges wishes to submit the following comments in response to the Executive's Draft Programme for Government 2011-15. The Coalition is organised by the Northern Ireland Committee of the Irish Congress of Trade Unions (NICICTU) and includes affiliated unions, political parties, community groups and campaigning organisations. The Coalition was established in 2006 to campaign against the introduction of household water charges in Northern Ireland and against the privatisation of water and sewerage services.

Responding last year to the Executive's Draft Budget 2011-15 the Coalition strongly welcomed the decision to defer the introduction of domestic water charges for the Budget period. The Coalition is therefore pleased to note that the Executive has reaffirmed there will be no additional water charges during this Programme for Government. The Coalition again records its full support for this policy which is consistent with the commitments given by the political parties to the electorate during the 2011 NI Assembly elections.

We note that the Draft Programme for Government does not include any proposals for change to the current governance arrangements for NI Water. However we have also taken note of the comments made by Department Officials and NI Water representatives at the meeting of the DRD Assembly Committee on 9 December 2011. In particular it was stated that "*the Minister certainly intends to bring forward proposals or options to the Executive by March 2012*" Previous Ministerial commitments were given that any proposals to change the current governance arrangements would be subject to full public consultation; we expect the Executive to honour those commitments.

Furthermore however, and in advance of any public consultation, we call on the Executive to ensure that key stakeholders, including the trade unions, have the opportunity to have full input to the development of the Minister's proposals. We seek assurance on this point. We would also expect that any options to change current governance arrangements are consistent with the policies set out in the previous DRD Minister's statements to the Assembly on 13 September 2010 that:-

NI water and sewerage services should be delivered by a body clearly within the public service ( *and accountable to the people of Northern Ireland through the NI Assembly*)

NI Water will not be privatised

No separate water charges will be introduced.



As we have made clear previously the Coalition believes the above policies provide the right platform for the future delivery of water and sewerage services in Northern Ireland.

5. We note and welcome the commitment to invest £600 million in water and sewerage infrastructure as part of this Programme for Government although this projected expenditure falls short of the capital investment needs as assessed by the Utility Regulator. The Coalition recognises that future funding of NI Water has been subject to competing views but we reiterate that the provision of water and sewerage services should be regarded as a vital public service, be publicly funded and have no lesser priority than the funding of other public services such as health or education.

6. The Coalition also submits that governance arrangements must meet the principle of full transparency of all capital and revenue costs of NI Water; and linked with this is the need for transparency on all public expenditure costs of the current and future governance arrangements.

7. Without prejudice to the preceding principles we note the comments made at the Assembly DRD Committee meeting that the current Treasury public expenditure rules limit NI Water's ability to plan and implement capital expenditure projects efficiently. The Coalition submits that it should be possible for the NI Executive to secure any required derogations from public expenditure rules so that NI Water can maximise the effectiveness of the funding available for capital investments.

8. We also noted the comments made by the acting Chief Executive of NI Water to the Assembly DRD Committee that *"if we can get it ( the public expenditure subsidy) to less than 50%"* this would also enable NI Water to be more efficient in managing capital investment projects. However it is a fact that households in Northern Ireland are contributing to water and sewerage costs through their regional rate payments. If these payments are taken into account it may be that the 50% threshold of customer funding of NI Water already occurs.

9. Consequently, if the NI Executive is unable to secure the derogations proposed in paragraph 7 above, as an alternative, the Coalition believes there should be further detailed examination of the options of restoring the practice of re-hypothecation of regional rates to identify the annual contribution by householders to the costs of water and sewerage services. This Coalition is continuing to examine the potential implications of re-hypothecation and, as a representative group, we would welcome further advance consultations with the Department on these matters.

Yours Sincerely



John Corey

Chairperson Coalition against Water Charges





## **Coleraine Borough Council**

# **Draft Programme for Government Budget 2011-15 Draft Economic Strategy Draft Investment Strategy for Northern Ireland 2011-21**

## **A Response to the Consultations**

Coleraine Borough Council  
Cloonavin  
66 Portstewart Road  
Coleraine  
BT52 1EY

### **INTRODUCTION**

The draft Program for Government 2011-2015 was published for consultation by the Northern Ireland Executive on 17<sup>th</sup> November 2011. It highlights the key goals and actions the Executive will focus on to progress the priorities over its term in office. It also sets the strategic context for the budget, investment strategy and economic strategy for Northern Ireland.

Coleraine Borough Council welcomes the opportunity to comment and respond on the draft document and recognises the importance these strategies will have for Northern Ireland. The comments made in this response are to be read in a constructive way and we would be pleased to amplify or clarify any points made.

## BACKGROUND

The Program for Government and its associated strategies are important documents for Northern Ireland. They set the strategic direction for the Executive and for the province.

Council is aware that many responses will be submitted by a wide variety of interested groups and representative bodies. This will include organisations that will comment from a broad Local Government perspective eg NILGA, SOALCE, Economic Development forum etc. In recognising the role and submissions these organisations may make, this submission is made on behalf of Coleraine Borough Council and represents the views of Councillors on the three strategy documents as they pertain to Coleraine Borough.

At the outset we would wish to be clear that it will not be possible to comment on every aspect of each of the strategies. Concentration is therefore afforded to those areas identified by Council as priorities. In responding to the documents, because they are so closely linked to each other, this is a composite response to all three.

Council welcomes the three draft documents and believes that Northern Ireland can be a much better place, economically, socially and infrastructurally and supports the broad themes of each of the strategies.

It is also important to recognise the strategic role of Coleraine Borough and the north coast region. Coleraine Borough has a population of approx. 57,000 people, however this figure increases seasonally as visitors come to the Borough. Many of these visitors have second homes in the area whilst others are staying in hotels, B&B's or caravans. The Borough is also home to the Coleraine campus of the University of Ulster and as such this sees 5000 undergraduate students (and their families) visit the region.

## OVERVIEW

In considering the consultation documents, it is the view of Council that this borough and its neighbouring areas have much to contribute to the Executive by way of achieving its targets.

Overarching themes within the documents refer to Tourism, Energy & Sustainability, Health, Telecoms, Education, Culture. Through this response, it is Council's intention to demonstrate that prioritising actions within this region will be to the benefit of Northern Ireland.

## ROLE OF LOCAL GOVERNMENT

Most, if not all, MLA's and ultimately Ministers previously played a role in local politics at Council level. Ministers will therefore be acutely aware of the important role that local government plays in its community. In 2008, whilst Minister for the DoE, Minister Foster articulated a vision for local government that Coleraine Borough Council still believes is relevant today and going forward

*"Our vision for local government is therefore one of a strong, dynamic local government creating communities that are vibrant, healthy, prosperous, safe, sustainable and have the needs of all citizens at their core. Central to the vision is the provision of high quality, efficient services that respond to the needs of people*

*and continuously improve over time. That vision resonates with the Executive's Programme for Government and the strategic priorities contained within it. It also reflects the strong desire that central and local government should work in partnership to deliver the Programme for Government and the vision for local government."*

As a local authority we believe Councils are well placed and are willing to play their part in delivering the Program for Government, however it will have to be based on an equal partnership.

Local Government is often seen as the Cinderella part of the public service. Recognition needs to be given to the limited powers that local government currently has and the scale and size of our resource base. In the current financial year (2011/12) the 26 councils in Northern Ireland will have a net estimated expenditure of £543m from an overall £10.4billion public spending budget, or around 5% of the public purse.

Council would therefore call on the Executive to reconsider the powers and functions (along with resources) that can be made available to Local Government post RPA. It also urges the Executive to implement the principle of subsidiarity – ie that decision making be taken at the lowest possible level possible.<sup>1</sup>

## Tourism

The documents correctly identify Tourism as a priority. The Investment Strategy states - *"Tourism has become one of our most important growth areas and with continued support for Signature projects and other tourism schemes we can continue to improve the offering, attract more visitors and benefit from the major events and occasions that will be taking place."*

Specifically the PfGaim is to *"increase visitor numbers to 3.6 million and tourist revenue to £625 million by 2013"* Two signature projects will have been completed early in the life of this Executive, the Titanic Building and the Causeway Visitors Centre.

The North Coast is Northern Ireland's premier tourist resort area with tourism being the key economic driver. Over 1 million bed nights are generated annually by visitors to Coleraine Borough contributing £60m to the local economy.

This region is recognised for its outstanding natural beauty and for being on the doorstep of the Giant's Causeway. Every year, hundreds of thousands of people come to the north coast to attend the annual festival of events whether it is the NW200, Milk Cup (celebrating its 30<sup>th</sup> anniversary this year) or the Airshow. The Olympic torch is only staying in Northern Ireland for 4 nights and Portrush has been selected as the first overnight destination.

One of the PfG objectives has already been accomplished – to secure a major golf tournament. Both these events are expected to bring significant (international) visitors to the region and demonstrate the strategic importance of the area. Additionally the Amateur open is to be held in 2014 and the aspiration is for the Open to follow. This region has a reputation for delivering high quality events that benefit the entire province, not just Coleraine. Our aspiration is to host more internationally recognised events that will drive the regeneration of the NI economy.

Whilst the region has so many opportunities with regards to tourism, many Ministers have visited the region in recent times and witnessed the physical infrastructure challenges we face. We would argue that a special case needs to be made for the North Coast and that priority to this region should be given by the Executive. Many regions can argue that they are also in need of regeneration and that is not disputed, however if Tourism is a priority and the North Coast is key, then an argument exists for such designation to occur.

Testament to the importance of this region is the fact that the draft documents out for publication bear so many images of the Giant's Causeway.

From a cultural tourism perspective, Irish history started in Coleraine, not once but twice. Mountsandel is the earliest known settlement of man in Ireland and the Plantation sees its roots in Coleraine.

## ENERGY & SUSTAINABILITY

Council recognises and supports the Executive's commitment to sustainable development as an overarching theme within the Program for Government

The supply of affordable, reliable and sustainable energy within the province is something that is of importance to both the economy and its citizens. Studies have been conducted concerning renewable energy sources within the province and our borough provides opportunities for this to be advanced e.g. geothermal, tidal, wave etc. Council is mindful of the balance that needs to be struck between developing alternative energy and the impact on the natural environment.

### Economic Development/Telecoms

In a recent report carried out by Oxford Economics for the Institute for Public Policy Research Coleraine is ranked 406th out of 412 regions with regard to the rate at which they are likely to come out of recession. The figures suggest that it could take Coleraine anything from six to ten years to come out of recession. Ballymoney is ranked even worse off than Coleraine at 408th, while Limavady lies at 404<sup>th</sup>. This points to the fact that urgent economic intervention and investment in the region is required.

Reference is made to the €30m Project Kelvin initiative which has delivered direct international connectivity to North America, improved connectivity with mainland Europe and enhanced cross-border telecommunications with the RoI.

The landing station and most secure access point for Kelvin is in Portrush and outline planning permission has been granted at the base station for a data centre.

Regrettably the impact of Kelvin has not materialised. Northern Ireland is one of the most digitally connected countries in Europe yet we have not been able to maximise and harness this potential. Cloud computing needs to be at the heart of the advancement of the technology proposition for Northern Ireland. Because of the uniqueness of Portrush's proposition, Coleraine Borough is ideally positioned to be a catalyst for this. The Executive needs to develop a Strategy for Cloud Computing as a priority.

Linked with advances in renewable energy sources on the borough, harnessing Kelvin's potential, Portrush's USP and the range of Courses and high quality of

graduates from the Coleraine campus of the University of Ulster – Northern Ireland could be a world leader.

## SOCIAL DEVELOPMENT AND URBAN REGENERATION

Coleraine has been highlighted in recent weeks from a social development perspective. Whilst issue can be taken with the editorial nature of the reporting, Coleraine does have two neighbourhood renewal wards within the Borough. Much investment, time and resources has already been committed but additional resources are still required.

Urban regeneration has been a key feature of much of the work over the last number of years. Masterplanning for Coleraine and environmental improvement schemes are being progressed. Council is grateful to DSD and other Departments/Agencies for their assistance. However no secret is made of the fact that the built environment in many parts of the Borough require considerable attention.

## EDUCATION & SKILLS:

Council recognises and agrees with the Executive's view that the skill base of countries and regions is increasingly the key determinant of relative economic growth, competitiveness and productivity – factors vital to support higher living standards in an increasingly globalised society.

Regrettably Council notes that no specific mention is made to investment in infrastructure in the Borough. As a region that has a thriving University Campus meritorious of expansion, outstanding Northern Regional College facility that is in need of investment and superior primary and post primary schools, Council calls on the Executive to target investment in facilities in this region.

## TRANSPORT INFRASTRUCTURE/REGIONAL DEVELOPMENT:

Council recognises the decision the Minister for Regional Development made recently with regard to the upgrading of the Coleraine to Londonderry rail line and notes that the draft program makes reference to future development (including the passing loop). The rail infrastructure is critical to this part of the province, not only for commuters but as a key economic driver.

With regard to the road infrastructure, Council is disappointed to note that no specific reference or commitment is specifically made to the dualling of the A26 at Frosses/Glarryford. Considerable work has been completed on this project and whilst it is recognised that it will not be in a position to go live for a period of time yet, a public commitment to the scheme would engender confidence.

The North West 200 attracts up to 100,000 people annually, the Airshow over two days attracts up to 200,000 people. This year Portrush will have the Olympic Torch overnight, Celebrate the Queens Jubilee and have up to 100,000 people coming to the Irish Open. Next year will see the 400<sup>th</sup> Anniversary of the Plantation. In 2014 the Amateur Open will be held at Royal Portrush and the aspiration is to have the Open as soon as possible after this.

The majority of people coming to these events travel by car and will suffer delays because the road network is insufficient beyond Ballymena. International visitors

and competitors to these events will have their first experience of the province by travelling this road from the two major airports.

This road has approximately 18,000 cars travelling on it per day. It has limited opportunity for passing and is subject to frequent accidents. It is a vital road, not only for visitors but for daily commuters.

Coleraine Borough Council therefore calls on the Executive to make a clear commitment to the dualling of the A26 and at the appropriate time allocate the necessary resources.

One of Coleraine's jewels is the River Bann which runs through the town. Regrettably the commerciality of the river has been reduced due to the economic conditions. The future of the river lies in recreation that is in harmony with the natural environment. Again, Council would call on the Executive to work with Council and the Harbour Commissioners on the development of the river for recreational and tourism purposes.

## HEALTH

Coleraine is the home to the Causeway Hospital, a key part of Coleraine's infrastructure. Only opened 10 years ago it is of critical importance to the area as it not only serves the people of Coleraine but also the many visitors who come annually to visit the region. Linking in with the previous point concerning road infrastructure, it is incomprehensible to consider alternative hospitals providing emergency services as the core network would not permit rapid response.

The draft Program for Government makes reference to connected health. Again Coleraine boasts the most secure and fastest ICT connectivity anywhere in the province linking it to North America, Europe and the rest of the world. Serious consideration should be given to advancing this technology in Coleraine, particularly as it has the skills base coming from the University of Ulster and Northern College.

## CONCLUSION

As indicated at the outset, Coleraine Borough Council welcomes the draft documents that have been issued for consultation. Council believes that by achieving these objectives, Northern Ireland will become a better place.

The Executive is encouraged to take seriously the proposition that Coleraine has. We have so much to offer the province and are keen to play our part. We have demonstrated a willingness to work in partnership with many departments in the past and look forward to continuing with this. We know that many Ministers visit the region, both vocationally and socially. We would be more than willing to clarify any points that may arise from this submission.



## College of Occupational Therapists

Response to the Programme for Government

Date: 22 February 2012

College of Occupational Therapists, 106-114 Borough High Street, Southwark, London SE1 1LB, [www.cot.org.uk](http://www.cot.org.uk)

Introduction:

The College of Occupational Therapists (COT) is pleased to provide a response to the

Draft Programme for Government 2011- 2015.

The College of Occupational Therapists is the professional body for occupational therapists and represents over 29,000 occupational therapists, support workers and students from across the United Kingdom of whom over 900 are in Northern Ireland.

Occupational therapists are valued for their ability to work in and across agencies such as health, social care services, housing, education, prisons, voluntary and independent sectors, and vocational and employment rehabilitation services.

Occupational therapists are regulated by the Health Professions Council, and work with people of all ages with a wide range of occupational problems resulting from physical, mental, social or developmental difficulties.

The philosophy of occupational therapy is founded on the concept that occupation is essential to human existence and good health and wellbeing. 'Occupation' includes all the things that people do or participate in, for example, caring for themselves and others, working, learning, playing and interacting with others. Being deprived of or having limited access to occupation can affect physical and psychological health.

Comments:

Occupational therapists are employees of Health and Social Care Trusts which have a statutory duty to assess the needs of disabled people, including their housing needs.

During the year ending 31 December 2007, there were 50,208 referrals for assessment by community occupational therapists and we believe there continue to be in the region of 50,000 referrals annually in recent years to what we estimate to be less than 200(WTE) community occupational therapists in Northern Ireland.

In Northern Ireland occupational therapists are also the nominated profession for the prescription of wheelchairs and related products. In 2011, 25,627 people in Northern

Ireland were wheelchair users - regular daily use as provided by Regional Disablement Service (RDS) Musgrave Park following an occupational therapists assessment. (This figure excludes temporary and occasional use wheelchairs on loan from organisations such as the British Red Cross and wheelchairs purchased privately e.g. from Halfords, mobility equipment providers.)



There were 2300 new wheelchair users in 2010/2011 compared to approximately 1300 in 2006/2007 (RDS)

The College supports future policy direction in health and social care which includes focusing on championing preventative and early intervention and avoiding necessary admissions to hospitals and care homes. This means there will be a shift in the care currently carried out in hospitals, towards the community. One of the milestones/outputs in the draft document for 2013/14 is to reduce the number of days patients stay in acute hospitals unnecessarily (excess bed days) by 10% compared with 2010. Alongside this the projected increase in Northern Ireland's population of older people and people with a learning disability and long term conditions will mean that occupational therapists will play an increasingly important role in enabling people to live as independently as possible in their own homes for as long as possible, decreasing the burden on health and social care in Northern Ireland, and reducing the need for complex and costly care packages. There must therefore be adequate resources for rehabilitation/reablement, housing adaptations, assistive technology and equipment to help people to remain in their own homes for longer should they wish. Whilst there is reference to the Health and Social Care reform Programme and reconfiguring networks etc we do not feel sufficient cognisance is taken of this very significant aspect of the reform. Further shifts to community provision will require additional resource deployment to areas such as assistive technology, housing and equipment and we do not feel this is adequately addressed in this draft Programme for Government. We recommend that:

The Department for Social Development/Department of Health and Social Services and Public Safety, Interdepartmental Review of Housing Adaptations which is nearing completion should be included as one of the building blocks for Priority 2 or Priority 5

There is no reference that we can see to the Dementia Strategy in the document. 'Improving Dementia Services in Northern Ireland - A Regional Strategy' should be included as one of the building blocks Mental Health Legislation.

We would like to see reference to the legislation which we understood to be in development to reform current local mental health legislation and develop new mental capacity legislation in a new single *Mental Capacity (Health, Welfare & Finance) Bill*. References:

Regional Disablement Services (RDS) Musgrave Park Demographic Information and Service Activity

Community Information Branch, Information & Analysis Directorate, Department of Health, Social

Services & Public Safety (DHSSPSNI) (2008) *Assessments by Community Occupational Therapists in*

*Northern Ireland* DHSSPSNI, Belfast



Colleges Northern Ireland (CNI), as the membership body representing Northern Ireland's six regional Colleges of Further and Higher Education, welcomes the Programme for Government (PfG) focus on the demand for skills, education and training that underpin the priority for economic growth and to address on social and regional disparities.

The strategic role for Northern Ireland's Colleges is defined as:

A key driver of local, sub-regional and regional economic development;

An active agent of social cohesion; and

A major promoter of lifelong learning.

With a combined turnover of almost £250 million, the Colleges collectively deliver almost 180,000 enrolments across a broad range of areas from entry level to post-graduate level, and provide direct support to over 4,500 companies across Northern Ireland. College provision meets the distinct needs of many different groups of learners through both full-time and part-time study, including:

Over 155,000 professional, technical and vocational enrolments;

Almost 7,000 Apprentices and Training for Success (TfS) Trainees, and in addition Steps to Work programmes;

20% of all Higher Education provision for indigenous students studying within Northern Ireland (11,004 enrolments in the Colleges and 43,960 in NI HEIs);

Support for 4,500 businesses through training and bespoke programmes and direct support including Business Improvement Techniques, Open Source Solutions, Rapid Prototyping, Mentoring, etc;

Up to 120,000 hours of provision into the post-primary schools sector (to 12,000 students);

Almost 25,000 Essential Skills enrolments (literacy, numeracy and ICT).

The Colleges have over 4,100 expert lecturers and professional staff delivering a range of vital professional, technical and vocational education and training opportunities and direct support to thousands of local companies. Sustained investment over the last decade has led to the development of industry-standard facilities and expert and experienced teaching staff, who have relevant industry skills and links. The Colleges have also made enormous progress in delivering an economically relevant curriculum and working with industry to meet the demand for skills through stronger links with local international and companies.

CNI believes that recently announced dissolution of the Department for Employment and Learning (DEL), and particularly decisions about the distribution of the functions of DEL will have significant consequences for how the Executive approaches implementation and delivery of PfG targets.

In addition to comments relating to specific Programme for Government targets, CNI make a number of general comments:

Welcome that the economy is identified as the key priority and set in the context of a multiplier bringing social and environmental benefits;

The importance of skills is clear and we welcome the fact that the importance of skills is prioritised and acknowledged;

Believe there is a need for new and imaginative ways to support indigenous business growth;

There is a need to fully understand the implications of Corporation Tax reforms, particularly in relation to the future demand for skills and FDI;

Welcome the commitment to balanced Sub-Regional Growth;

We welcome the focus on school leavers and minimum qualifications. Northern Ireland would benefit from an agreed policy framework for 14-19 year olds, with guidance on collective targets and principles for the post-primary sectors; including engagement with Colleges and other providers to ensure access to genuine high quality professional, technical and vocational education and training opportunities;

There is a clear need for greater direction on policy relating to NEETs;

We welcome fact that Government is realigning capital from revenue monies but it should be noted that Colleges need sustained investment in infrastructure if they are to be in a position to meet the demands of industry.

The links between Colleges and the economy are vital in ensuring that there is a continuous supply of well qualified, suitably skilled young people for the needs of local companies. Significantly, 70% of the current workforce will still be in employment by 2020, therefore, in a changing environment there is a need to both up-skill and re-train this cohort to make an effective contribution to the economy. This link is essential in meeting the focused demands in priority areas that have been identified as key economic drivers. Further strengthening these relationships may also provide much stronger progression routes for young learners from post-primary education into employment and attainment of higher level skills through professional, technical and vocational routes.

There are a number of significant factors affecting the workforce in Northern Ireland:

The need to re-train and up-skill the existing workforce;

The skills deficits at Level 3, 4 and 5;

The need to tackle unemployment, particularly youth unemployment and the issues of NEETS.

The Colleges are key to re-training and up-skilling our existing workforce and moving people from unemployment into jobs. They also have a key role in supporting economic development and inward investment, particularly in light of changes to the rules governing state aid, through for example the Assured Skills scheme.

Colleges currently provide a range of support for local and international companies, including developing bespoke training to meet the specific needs of employers and direct support through Business Improvement Techniques (BIT) programmes, Open Source Solutions (IT solutions), Rapid Prototyping, Innovation Vouchers, Knowledge Transfer Programmes (KTP) and Mentoring. The draft action plan in support of the Economic Strategy for Northern Ireland has identified the important role that Colleges will play in supporting business innovation, growth and knowledge transfer.

Similarly links between schools and colleges are essential in meeting the needs of learners who may otherwise fail to achieve progress from post-primary education and who will benefit from access to quality professional, technical and vocational provision. It is important to recognise that the College Curriculum offer for 14-19 age group is very different from that within the post-primary sector and, given the investment in industry standard facilities and expertise within the College sector, will remain critical in the future. It is vital to sustain a curriculum for many young people that is vocational in focus since the school curriculum tends to emphasise mainly on the academic. The progression routes for 14-19 year olds are critical in tackling youth unemployment and the issue of NEETS and ensuring young people have access to opportunities to achieve higher level skills and employment.

CNI believes that given the vast range of opportunities offered by the regional Colleges in terms of progression routes, professional, technical and vocational training and education, key skills and qualifications; and the experience of providing student support, particularly for 'at risk' learners that the colleges must be at the heart of any response to tackling the issue of young people not in education, employment or training.

In response to specific targets relating to the Colleges in the draft PfG 2011-2015:

Increase uptake in economically relevant Science, Technology, Engineering and Mathematics (STEM) places (DEL) – 180 additional places (2012/13); 360 (13/14); 540 (14/15)

Colleges NI welcome the focus on increasing the uptake in economically relevant STEM places. However, there needs to be urgent clarification of exactly what constitutes STEM provision, with a clearer definition of what is deemed STEM, which should be linked to the defined priority skills. This is currently not the case. For example applied science and related areas of the curriculum, although falling under what would be understood and accepted as STEM, are not priority areas.

We also believe that the key to making progress in this area is to support effective progression routes, for example by closer working together between DEL and DE to enhance the status and recognition of vocational STEM routes.

In addition Colleges NI is extremely disappointed at the very low allocation of additional full-time HE places for the FE sector announced in December. We believe this was a missed opportunity and will not allow for the development of innovative

new STEM related courses or support the further development of 2-year Foundation Degree programmes, which are critical in addressing the skills deficit at Level 4 and 5 (sub-degree programmes) and higher level skills at advanced technician level.

It should be noted that Northern Ireland is alone in the UK in having no Level 4 or 5 Apprenticeship provision.

Colleges NI believe there is a need to explore the potential benefits of advanced apprenticeships at Level 4 and 5 and to promote advanced apprenticeships linked to existing priority areas and new and emerging industries. This would have the potential to develop a high level skills base that is not dependent on student support mechanisms towards one that is based on real employment opportunities and delivery on a part time basis, including the use of Foundation Degrees.

Up-skill the working age population by delivering over 200,000 qualifications (DEL) - 105,000 qualifications (2012/13); 53,000 (13/14); 53,000 (14/15)

Northern Ireland's Colleges are the main provider of skills training and central to the ability of DEL to meet these challenging target.

It should be noted that the current value of the Funded Learning Unit (FLU) has remained unchanged since it was introduced in 2007, which given inflationary pressures represents a very significant efficiency saving. In addition it should be noted that the funding envelop for the sector in 2011/12 was based on FLU targets for delivery of £151 million from a budget of £143 million. This significant level of over delivery to date by the Colleges, in a shrinking budget, is not sustainable over the lifetime of the PFG without additional resources.

Colleges believe that the cost implication of meeting this target is approximately £36 million.

Colleges NI also believes that there needs to be greater clarity about the plan for meeting these targets, including what is meant by qualifications and how DEL intends to up-skill those currently in employment.

In terms of the target for the delivery of qualifications, Colleges NI also believe that changes to funding for the entitlement framework will have a very significant impact on the contribution of the Colleges to the achievement of vocational qualifications at both level 2 and 3.

Support people (with an emphasis on young people) in to employment by providing skills and training (DEL) – 65,000 (2012/13); 89,000 cumulative (13/14); 114,000 (14/15)

Colleges NI welcomes these targets but is concerned that they become meaningless unless they are linked to job creation strategies, and for examples with those areas identified by the Executive as key economic drivers. For example the priority skills areas identified in the Richard Barnett report fail to focus on hospitality and tourism, yet these areas are identified by DETI as key economic drivers.

To ensure there are no increases in student fees beyond the rate of inflation for Northern Ireland students studying here

In our response to the consultation on student fees, Colleges NI raised concerns about the implication of this position both in terms of budgetary pressures within in DEL, and the threat to already very stretched College budgets, and on the flow of indigenous students and their opportunities for progression within Northern Ireland.

In addition there are a number of PfG target that have implications for the Colleges, and particularly the re-skilling and retraining agenda, including:

1. support the promotion of over 25,000 new jobs;
2. achieve £300 million investment through Foreign Direct Investment;
5. increase the value of manufacturing exports by 15%;
6. support £300 million investment by businesses in R&D, with at least 20% from SMEs;
7. increase visitor numbers to 3.6 million and tourist revenue to £625 million by 2013;
10. support 200 projects through the Creative Industries Innovation Fund;
18. make the Education and Skills Authority operational in 2013;
21. encourage industry to achieve 20% of electricity consumption from renewable electricity and 4% renewable heat by 2015;
27. improve thermal efficiency of Housing Executive stock and ensure full double glazing in its properties;
35. invest £40 million to improve pathways to employment, tackle systemic issues linked to deprivation and increase community services through the Social Investment Fund;
36. implement a strategy for Integrated and Affordable Childcare;
37. deliver a range of measures to tackle poverty and social exclusion;
38. agree any changes to post-2015 structures of Government in 2012;
39. finalise the Cohesion, Sharing and Integration Strategy to build a united community and improve community relations;
42. extend age discrimination legislation to the provision of goods, facilities and services;
43. fulfil our commitments under the Child Poverty Act to reduce child poverty;
47. reform and modernise the Prison Service;
48. reduce the level of serious crime;
54. ensure there are no increases in student fees beyond the rate of inflation for Northern Ireland students studying here;

- 58. increase uptake in economically relevant Science, Technology, Engineering and Mathematics (STEM) places;
- 59. up-skill the working age population by delivering over 200,000 qualifications;
- 60. support people (with an emphasis on young people) in to employment by providing skills and training;
- 63. improve literacy and numeracy levels among all school leavers, with additional resources targeted at areas of educational underachievement;
- 65. establish a Ministerial advisory group to explore and bring forward recommendations to the Minister of Education to advance shared education;
- 73. bring forward a £13 million package to tackle rural poverty and isolation in the next 3 years.

Colleges Northern Ireland Response to the draft Programme for Government 2011-15

Colleges Northern Ireland

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First Floor

39 Stockmans Way

Belfast

BT9 7ET

**Comhairle na Gaelscoisochta**

PROGRAMME FOR GOVERNMENT – 2011-15 – CONSULTATION REPLY PROFORMA	
Name:	Pádraig Mac an tSaoir
Organisation:	Comhairle na Gaelscolaíochta
Question 1	
Do you agree that the Programme for Government is designed and balanced in a way that is appropriate in enabling the delivery of its priorities?	



If you do not agree, please explain why and what alternatives you would propose.

*(No more than 500 words)*

#### Question 1

Comhairle na Gaelscolaíochta does not agree. There is no guarantee that an Irish Language Act will be introduced on the back of the commitment given at Saint Andrew's. Comhairle na Gaelscolaíochta believes that this is a major weakness in the Draft Programme as such a commitment would have implications for the whole programme. An Irish Language Act and Irish language legislation are both mentioned in the Saint Andrew's Agreement and it would be expected, as a result, that they would both be included in the Programme for Government. In their absence, we believe that the amount that could be achieved will be reduced over a range of areas including four of the five priority areas that are mentioned. At a general level, in the absence of such a commitment regarding the wishes of thousands of Gaeilgeoirí (Irish language speakers) in Northern Ireland, including the ever increasing Irish-medium education community, it appears that this is a major weakness when one considers the opportunities that are emerging in cultural tourism, the media and education that are adding to the opportunities for small businesses, employment, etc. In spite of the fact that progress could be made in this regard through the Irish Language Strategy that is mentioned, it is a cause of disappointment that the opportunity was not taken to bring our legislation up the level of the recommendations that were made in the Framework Convention for the Protection of National Minorities and in the European Charter for Regional or Minority Languages. One of the main positive outcomes that would flow from such a development would be that the linguistic and cultural aspirations of a huge part of the community would be affirmed, aspirations that had been cut out of "official" culture in this part of the island. Under the Framework Convention for the Protection of National Minorities and the European Charter for Regional or Minority Languages, the British Government and the NI Executive are duty bound to protect the Irish language.

## Question 2

Do you agree that the Programme for Government sufficiently links the key commitments to plans for delivery?

If you do not agree, please explain why and what alternatives would you propose.

*(No more than 500 words)*

## Question 2

Comhairle na Gaelscolaíocht does not agree. We believe that the “building block” of an Irish Language Strategy should not only be linked to Priority 4 but to Priorities 1, 2 and 5 as well.

Priority 2 “Improve literacy and numeracy levels among all school leavers, with additional resources targeted at areas of educational underachievement.” One of the building blocks that is mentioned in this regard is *Count, Read: Succeed - A Strategy to Improve Outcomes in Literacy and Numeracy*. There is a version of this for Irish-medium education that contains plenty of recommendations for the Department of Education to ensure that support is being provided for schools in the context of immersion education. If these recommendations are not implemented in a timely way, the above target will not be achieved – we recommend that specific reference be made to the Irish-medium version of the literacy and numeracy strategy as well.

10.4% of the population in Northern Ireland are Gaeilgeoirí (Census 2001), and many of them are young school leavers. Vocational education for Gaeilgeoirí (as mentioned in ECRML, Article 8, Paragraph d.) is a positive message for young people that lets them see that they have a future at home instead of abroad, something that ensures that their skills will not be lost to the North. Irish–medium career training courses should be developed for young Gaeilgeoirí as part of the Programme for Government.

### Implement an Integrated and Affordable Childcare Strategy

A lot of families bring up their children with Irish as the main language in the home. There are difficulties, however, when they seek satisfactory childcare, and when all that is available, or affordable, is childcare in an English language setting. This interferes with the aims of parents who want to speak Irish at home. In implementing this strategy, the Programme for Government should take the needs and wishes of the Irish language families on board, and the provision of Irish-medium childcare should be part of its plans.

“We will make the Education and Skills Authority operational in 2013”. If it is the case that the ESA is to be operational by 2013 and fully functional by 2014/15, the Government must ensure, through careful planning, that the ESA will focus on the needs of Irish-medium education in a way that is sensitive to the whole sector, as laid out in the Review of Irish-medium Education in 2008. This will have implications as regards the provision of services through the medium of Irish and as regards ensuring that it will be clearly understood throughout the ESA that there are implications related to the immersion education system from the point of view of planning and delivery.

As regards the Education and Skills Authority that will be operational, it seems, by 2013, it will be obliged to “encourage and facilitate” Irish-medium education and the Irish language and its promotion should be one of its core values. Attempts at development and provision of resources should be boosted, and as far as Area-based planning is concerned, it must be recognised that Irish-medium education should be provided to parents that rear their children with Irish instead of only giving them the option of sending their children to an English language setting that is already available. |

### Question 3

Do you agree that, in general, the key commitments contained within the document are appropriate to the successful achievement of priorities?

If you do not agree, please explain why and identify any potential gaps that may exist. *(No more than 500 words)*

### Question 3

We do not agree. In the absence of any guarantee to introduce a Language Act as part of this programme, it appears to us that there are some priorities that will not be achieved. In spite of it being a cause of satisfaction that a proposed Irish language strategy is mentioned, it is a cause of disappointment that significant reference is not made to the implications related to such a strategy down through the Draft Programme for Government.

In Priority 1 we would expect some specific reference to the promotion of cultural tourism and language e.g. in West Belfast, where there is great promise.

Furthermore, in Priority 1 regarding the promotion of creative industries, it would be good to make clear reference to the Irish language media, Irish language radio, film-making in Irish, etc. In spite of the fact that it is understood that Broadcasting is still reserved (to Westminster), it should be recognised in the Draft Programme for Government the promise and the importance related to the Irish language media.

As regards “Improving the Skills of People of Employable Age” there should be a reference to the lack of qualifications for school leavers in Irish-medium education, e.g. in education, translation, childcare, etc.

There should be a reference to the role Irish has in a shared society and to the way the Government could celebrate the Irish language as part of a positive aspect of our culture and tradition.

The two main communities in the North understood, over the years, that the Irish language belonged to one community. But as a result of recent initiatives it has been shown that the two communities have a strong connection to the language, even though there is still some distance to go to raise confidence. It would be an important milestone to have strong support for the Irish language in the Draft Programme for Government so that it would be understood and accepted that we have a shared culture and language, apart from a culture and a language that separates us.

There should be a reference to the way in which the civil service, councils, etc, could conduct audits and be proactive in other ways as regards using the Irish language skills of their employees to add to their ability to provide services through the medium of Irish.

Question 4

Do you agree the Programme for Government is appropriately balanced in terms of sub-regional recognition?

If you do not agree, please explain why and provide supporting information.

*(No more than 500 words)*

Question 4

Comhairle na Gaelscolaíocht has nothing to say on this issue.

Question 5

Do you agree that the Programme for Government is appropriately balanced in terms of its recognition of major sectoral issues?

If you do not agree, please explain why and highlight any major sectoral issues for consideration. *(No more than 500 words)*

Question 5

We do not agree. In spite of Irish-medium education being the main focus of Comhairle na Gaelscolaíochta, it is also interested in the provision of Irish language opportunities, Irish language services, etc, in general because the Irish language pupils that are coming out of our schools are adding to the Irish language community. As a result of this, the demand for Irish language services is increased. Because there are no specific references regarding support, opportunities, services, etc. there is the danger that the number of disadvantaged Irish-medium pupils, school leavers (both of which are still increasing) and adults will increase during the life of the Programme for Government.

Question 6

Do you agree that the Programme for Government presents its priorities and commitments in a way that is fair and inclusive to all?

If you do not agree, please explain why. *(No more than 500 words)*

Question 6

We do not agree. As is clear from the last answer, Comhairle na Gaelscolaíochta believes that the Programme for Government is not as comprehensive as it should be as regards the Irish language community. There is a new era in Northern Ireland now. Still, there are no guarantees for Irish-medium education children, their families and their extended families as regards the provision of employment opportunities through Irish, having better access to the Irish language media, Irish being more visible in signs as appropriate, etc. It is hard to defend this. The Good Friday Agreement places an obligation on the Government to encourage and facilitate Irish-medium education. This responsibility should not fall to the Department of Education alone but to every Department given that their roles influence education in one way or another.

It would be expected, as a result, that there would be explicit guarantees from DEL, for example, regarding further education and training to focus on Irish-medium school leavers, from DCAL as regards promoting culture and arts through Irish for Irish-medium pupils, and from other Departments as regards bilingual signage that would illustrate that recognition and respect is being given to Irish language pupils, Irish language teachers and Irish language families, e.g. in the case of the DOE where Irish-medium education pupils use the transport system. Use should be made of cross border opportunities that are available to every Department to support Irish language communities that are based on Irish-medium schools and admit that they are there for them and to facilitate activities to serve their needs.

Question 7 Are there any other issues in the Programme for Government that you wish to comment on? (No more than 500 words)
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#### Question 7

In summary, Comhairle na Gaelscolaíochta is of the opinion that important opportunities may be missed in the Government's overall strategy to build a strong shared community if they cannot add to the number of commitments in this Draft Programme for Government. Even though it is a requirement and an entitlement of the Irish language community that an Irish language Act be passed as promised in the Saint Andrew's Agreement, a Programme for Government in which an Irish language strategy is specifically mentioned throughout it the least the Irish language community would expect. Over the years Comhairle na Gaelscolaíochta has learned that there is little chance of anything being done as regards Irish unless the Government gives explicit commitments to that end.

It is a matter of interest to Comhairle na Gaelscolaíochta, on behalf of the thousands of children that are in Irish-medium education at present, that the implementation of the *Count, Read: Succeed* Strategy and the establishment of ESA, on which there is specific emphasis in this programme, be brought forward in a way that will take into account, in its entirety, the immersion education system.

As mentioned in the answer before this every Government Department should give an explicit guarantee that they will encourage and facilitate Irish-medium education in areas where their role has an influence on education and there should be a guarantee, in keeping with the proposals in the Review of Irish-medium Education, that this will be brought forward on a North-South basis in any event where such an opportunity presents itself.

# Commissioner for Older People for Northern Ireland

## Response

### Draft Programme for Government 2011-15

#### Introduction

The office of the Commissioner for Older People for Northern Ireland (the Commissioner) is an independent public body established under the Commissioner for Older People Act (Northern Ireland) 2011.

The principal aim of the Commissioner is to safeguard and promote the interests of older persons.

The main duties of the Commissioner are amongst others:

- The Commissioner must promote an awareness of matters relating to the interests of older persons and of the need to safeguard those interests;
- The Commissioner must keep under review the adequacy and effectiveness of law and practice relating to the interests of older persons;
- The Commissioner must keep under review the adequacy and effectiveness of services provided for older persons by relevant authorities;
- The Commissioner must promote the provisions of opportunities for, and the elimination of discrimination against older persons;
- The Commissioner must encourage best practice in the treatment of older persons;
- The Commissioner must promote positive attitudes towards older persons and encourage participation by older persons in public life.

In addition the Commissioner may provide advice or information on any matter concerning the interests of older persons.

The Commissioner welcomes the opportunity to respond to the Northern Ireland Executive's consultation on the draft Programme for Government 2011-15, '*Building a Better Future*'.

#### Programme for Government

The Commissioner welcomes the Executive's commitment to build a shared and better future for all people in Northern Ireland through the delivery of the Programme for Government. The wealth of experience, skills, vibrancy and knowledge of older people could contribute to the realisation of this goal for all.

A significant number of the population of Northern Ireland are aged over 60 years<sup>85</sup>, 353,800 persons, approximately 19.7% of the population.

Recognition of the need to place older people at the heart of decision-making on issues that affect them and the need to protect their rights and interests should be clearly demonstrated in the Programme for Government.

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<sup>85</sup> Population and Migration Estimates Northern Ireland (2010)- Statistical Report, NISRA June 2011.



The Commissioner considers that the forthcoming strategy for older people should be a key building block across the entire Programme for Government to reflect those needs. Recognising the challenges faced by Government in delivering tangible outcomes for older people through the implementation of the Programme for Government, the Commissioner advocates effective joined up working across Government Departments to ensure that older people's rights and interests are upheld and realised through the implementation of associated Departmental operational plans.

The key issues that are identified by older people are income, transport, housing, health and social care and community safety.

## Priorities

### Priority 1. Growing a Sustainable Economy and Investing in the Future

The profile of the working age population is changing, under current legislation the pension age for females will be increased incrementally from 60- 65 between April 2010 and April 2020. In 2010 this resulted in an increase of approximately 2,000 females to the working age population. In addition, as pension age for both males and females is to be raised from 65 to 68, the number of people of working age is projected to rise by 8% from 1,111,000 in mid-2010 to 1,200,000 in mid-2025<sup>86</sup>. The strategic direction of Government should reflect the changing demographic profile of the population in Northern Ireland.

The Commissioner would consider that priority one should refer to and include a commitment to maintaining and supporting individuals in our ageing population who choose to remain longer in the workforce. Whilst a commitment to upskill the working age population by delivering over 200,000 qualifications is welcomed, the Commissioner recommends that this commitment is further underpinned by measures to encourage, enable and support older people to secure the necessary qualifications to enable them to fully participate in the workforce.

### Priority 2. Creating Opportunities, Tackling Disadvantage and Improving Health and Well Being

The Commissioner welcomes the commitment in priority two to extend age discrimination legislation to the provision of goods, facilities and services. Access to goods, facilities and services through improved access to health and social care services, financial services, transport provision and other services is key to address social exclusion experienced by older people. The UK Government has made it clear that the introduction of age discrimination legislation outside the workplace' can help improve active ageing and independent living and thus reduce costs related to medical treatment, admissions to care homes and emergency hospital care'.<sup>87</sup> The Commissioner looks forward to the introduction of age discrimination legislation which ensures that older people are treated fairly and have equality of opportunity in accessing goods, facilities and services.

The Commissioner notes that the commitments given in priority two to tackle poverty and social exclusion and reduce fuel poverty do not specifically refer to older people. Pensioner households have the highest rate of fuel poverty across all household

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<sup>86</sup> Statistical Report – 2010- Based Population Projections, NISRA October 2011.

<sup>87</sup> Equality Act 2010: Banning age discrimination services, public functions and associations. A consultation on proposed exceptions to the ban, GEO, Feb 2010, [www.homeoffice.gov.uk](http://www.homeoffice.gov.uk).



types. In 2001, 40% of pensioner households lived in fuel poverty compared to 22% of working age households and 21% of households with children. In 2006, 50% of pensioner households lived in fuel poverty compared to 27% of working-age households and 27% of households with children.<sup>88</sup>

The 2009 House Condition Survey reported the rate of fuel poverty in age groups 60-74 as 53% and the rate of fuel poverty in 75 years plus age group was reported as 76%.<sup>89</sup>

The Commissioner considers that a range of measures to target and address fuel poverty and to tackle poverty and social exclusion for older people should be considered a strategic priority for Government and demonstrated as such by inclusion in the programme's priority two milestones and outputs.

### Priority 3. Protecting Our People, the Environment and Creating Safer Communities

Gaining access to appropriate, person centred health and social care services based on individual need is a major issue for older people. Health and social services should be provided to older people on an equitable basis to other age groups relevant to their individual health needs and social care needs. Age should not be a criteria for service provision. The Commissioner recognises that reform and modernisation of the health and social care system is ongoing. However, the Commissioner notes the absence of any specific reference to the needs of older people in the commitments in priority three to the long term improvement of health and well being outcomes for the population and would recommend that Government includes specific measures in priority three to address inequalities in health for older people.

The fear of crime and crime against older people can have a disproportionate negative impact on older people's health and well being, sense of security in their homes and communities and their participation in civic life. The Commissioner welcomes the commitment by Government to tackle crime against older people by more effective and appropriate sentencing. The Commissioner recommends that Government through implementation of its strategy – *Safer Ageing – A Strategy and Action Plan for Ensuring the Safety of Older People* ensures that discrete actions are undertaken to address fear of crime amongst older people and improve outcomes for older victims of crime.

### Priority 4. Building a Strong and Shared Community

Older people make a significant contribution to building a strong and shared community in Northern Ireland. Older people contribute to civic life through formal and informal volunteering, to the ongoing development of our communities, to peace building and to wider society as carers, volunteers, grandparents and campaigners.

The Commissioner would advocate that priority 4 makes reference to the contribution older people make to building relationships within and between communities and to wider civic society as a whole and that the Programme for Government reflects this overall contribution.

### Priority 5. Delivering High Quality and Efficient Public Services

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<sup>88</sup> Lifetime Opportunities Monitoring Framework Baseline Report, DSD, October 2010.

<sup>89</sup> Warmer Healthier Homes – A New Fuel Poverty Strategy for Northern Ireland, DSD, March 2011.

This priority includes a commitment to improve online digital access to government services. The Commissioner would advise that Government considers the digital divide between those who are computer literate and have access to computers and those who are not computer literate and do not have access to computers. The proposed increase of use of online services may have a significant impact on older people's ability to access appropriate public services. The commitment could usefully include a statement of milestones and mitigating measures that address the digital exclusion of older people and which will enable older people to access appropriate public services.

The proposed reconfiguration of health and social services commitment in priority 5 and the shift in the model of service delivery to primary and community care should be underpinned by robust, transparent and funded support systems. The Commissioner recommends that any fundamental review of the health and social care system focuses on providing a modern responsive care system which ensures that older people's rights are upheld and entitlements realised.

## Conclusion

The Commissioner would be of the view that the Programme for Government needs to more fully reflect older people's rights and interests. The older people's strategy should be included as a building block across the Programme for Government. Commitments contained in the programme should be revised to incorporate measures which promote and protect older people's interests and specific needs. Monitoring progress of the implementation of the programme will be key to ensuring that the rights and interests of older people are upheld and realised. The Commissioner recommends utilisation of the older people's strategy as a monitoring tool for the programme. The Commissioner also recommends that actions for Departments which cascade from the older people's strategy are evidence based, have attached budgets and are time bound and are mapped across the outworkings of the Programme for Government.

## Committee on the Administration of Justice

CAJ's Submission to the Draft Programme for Government, 2011-15, February 2012

### *What is the CAJ?*

The Committee on the Administration of Justice (CAJ) was established in 1981 and is an independent non-governmental organization affiliated to the International Federation of Human Rights. CAJ takes no position on the constitutional status of Northern Ireland and is firmly opposed to the use of violence for political ends. Its membership is drawn from across the community.

The Committee seeks to ensure the highest standards in the administration of justice in Northern Ireland by ensuring that the government complies with its responsibilities in international human rights law. The CAJ works closely with other domestic and international human rights groups such as Amnesty International, Human Rights First (formerly the Lawyers Committee for Human Rights) and Human Rights Watch and makes regular submissions to a number of United Nations and European bodies established to protect human rights.

CAJ's activities include - publishing reports, conducting research, holding conferences, campaigning locally and internationally, individual casework and providing legal advice. Its areas of work are extensive and include policing, emergency laws and the criminal justice system, equality and advocacy for a Bill of Rights.

CAJ however would not be in a position to do any of this work, without the financial help of its funders, individual donors and charitable trusts (since CAJ does not take government funding). We would like to take this opportunity to thank Atlantic Philanthropies, Barrow Cadbury Trust, Hilda Mullen Foundation, Joseph Rowntree Charitable Trust, Oak Foundation and UNISON. The organization has been awarded several international human rights prizes, including the Reebok Human Rights Award and the Council of Europe Human Rights Prize.

### [Submission to the Office of the First Minister and Deputy First Minister, 'Draft Programme for Government' 2011-15 Consultation February 2012](#)

#### Committee on the Administration of Justice ('CAJ')

CAJ is an independent human rights organization with cross community membership in Northern Ireland and beyond. It was established in 1981 and lobbies and campaigns on a broad range of human rights issues. CAJ seeks to secure the highest standards in the administration of justice in Northern Ireland by ensuring that the Government complies with its obligations in international human rights law.

The draft Programme for Government (PfG) 2011 – 2015 was published by the First Minister and deputy First Minister on 17<sup>th</sup> November 2011. The PfG forms an integral part of a suite of three documents the other two being the Economic Strategy 2012–2030 and an Investment Strategy. The draft PfG contains five main priority areas: growing a sustainable economy and investing in the future; creating opportunities, tackling disadvantage and improving health and well being; protecting our people, the environment and creating safer communities; building a strong and shared community and delivery of high quality efficient public services.

## Executive Summary

CAJ wishes to draw attention to commitments which engage human rights, many of which derive from the Belfast/Good Friday Agreement and the various Agreements making up the peace settlement which followed it, which we would expect to see reflected in the PfG. In summary the areas we would like to see addressed further to the draft PfG include:

- explicit inclusion of reference to single equality legislation, particularly given international commitments;
- addressing the gaps in provisions to meet commitments to reducing unemployment, tackling the employment differential, re-integration of ex-prisoners, and general integration and equality strategies;
- gender equality commitments specifically in relation to affirming the rights of women to full and equal political participation;
- clarity on the implementation of the Youth Justice Review;
- clarity on the implementation of prison reform, including provision for a women’s prison;
- the explicit inclusion of commitments for the Irish language and Ulster Scots further to the St Andrews Agreement;
- clarity on ‘freedom from sectarian harassment’ and taking forward reforms to parades legislation;
- the inclusion of mechanisms for formally considering and implementing recommendations from UN and Council of Europe treaty bodies, as well as outstanding matters from peace settlement agreements; and
- the correct sequencing of the PfG consultation and its equality impact assessment;

### Introduction: human rights commitments and the Agreements

CAJ has a general concern there are a number of human rights (including equality) commitments from the various Agreements making up the peace settlement (*Belfast/Good Friday Agreement 1998, Weston Park 2001, The Joint Declaration by the British and Irish Governments April 2003, the St. Andrews Agreement 2006 and the Agreement at Hillsborough Castle 2010*(‘the Agreements’)) which have not been taken forward or which have been rolled back.

With the exception of the Sinn Féin-DUP Agreement at Hillsborough Castle, and the multiparty section of the Belfast/Good Friday Agreement, the other documents are international Agreements between the two sovereign governments of the UK and Ireland. In accordance with the 1969 Vienna Convention on the Law of Treaties commitments in treaties must be interpreted and performed in good faith. Whilst complying with the terms of treaties is an obligation on the state, and hence ultimately a matter for the sovereign governments, there is provision for implementation by devolved institutions, such as the NI Executive, on matters which fall within its competence. By virtue of the Northern Ireland Act 1998, the UK has devolved ‘observing and implementing international obligations’<sup>90</sup> to Northern Ireland. In addition, the UK’s Memorandum of Understanding on Devolution provides for Northern Ireland to fulfill some treaty obligations.<sup>91</sup> The monitoring of and reporting on international obligations remains the responsibility of the UK

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<sup>90</sup> Schedule 2 para 3(c) Northern Ireland Act 1998.

<sup>91</sup> Memorandum of Understanding on Devolution: D Concordat on International Relations – Northern Ireland, at para D3.4, and Common Annex, at para D4.3, found at <http://www.official-documents.gov.uk/document/cm78/7864/7864.pdf>.

government<sup>92</sup> and the UK's Memorandum of Understanding on Devolution recognises that final responsibility for such matters rests with the UK.<sup>93</sup>

Whilst the majority of unimplemented or rolled back commitments we have identified in fact fall to the British Government, there are a number which fall within the competence of the devolved institutions. This submission therefore focuses on a limited number of commitments found within the international Agreements and the Hillsborough Agreement, which CAJ would expect to be reflected in the PfG.

### Single equality legislation

The Joint Declaration by the British and Irish Governments 2003, references the Single Equality Bill as a vehicle to give legislative effect to rights contained within the Belfast/Good Friday Agreement. The St. Andrews Agreement 2006 reaffirmed the commitment to a Single Equality Bill and provided (pre-devolution) that the British government "will work rapidly to make the necessary preparations so that legislation can be taken forward by an incoming Executive at an early date"<sup>94</sup>. A good faith interpretation of these internationally agreed commitments is that a Single Equality Bill would have been taken forward as a matter of priority by the devolved institutions. Whilst the preparatory work was under taken it appears that no work is currently being undertaken, or even planned, to prepare such legislation by the NI Executive.

It is difficult to see the outworking of an Equality and Good Relations Programme that does not include legislative reform which engages treaty-based commitments. Indeed, the absence of the Single Equality Bill from the draft PfG is even more striking given the numerous treaty body statements that, in order to comply with international obligations, comprehensive and consistent equality legislation should be introduced.<sup>95</sup> Just last year, the UN Committee on the Elimination of Racial Discrimination ('CERD') recommended that immediate steps are taken to ensure that a single equality law is adopted in Northern Ireland<sup>96</sup> and the Advisory Committee on the Council of Europe's Framework Convention on National Minorities ('FCNM') recommended that the "authorities responsible for the implementation of the Belfast/Good Friday Agreement and the St Andrews Agreement should also step up efforts to adopt a Single Equality Act" for Northern Ireland.<sup>97</sup>

### Other substantive equality and integration measures

The Belfast/Good Friday Agreement provides for the UK to implement: "a range of measures aimed at combating unemployment and progressively eliminating the differential in unemployment rates between the two communities by targeting

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<sup>92</sup> As not specifically excluded from the excepted list at Schedule 2 para 3(c) Northern Ireland Act 1998, *supra*.

<sup>93</sup> Memorandum of Understanding on Devolution: D Concordat on International Relations – Northern Ireland, at para D3.4, and Common Annex, at para D4.3.

<sup>94</sup> St Andrews Agreement 2006, Annex B.

<sup>95</sup> See, for example, para 63, ACFC/OP/II(2007)003, where the Advisory Committee on FCNM recommended that 'existing inconsistencies in anti-discrimination legislation are removed' and para 29, CERD/C/63/CO/11, the UN Committee recommended the introduction of 'a single comprehensive law, consolidating primary and secondary legislation' (2003).

<sup>96</sup> CERD/C/GBR/CO/18-20, at para 19.

<sup>97</sup> ACFC/OP/III(2011)006, at para 128.



objective need.”<sup>98</sup> The parties to this Agreement also affirm their commitments to a number of specific rights including:

- the right to equal opportunity in all social and economic activity, regardless of class, creed, disability, gender or ethnicity;
- the right to freely choose one’s place of residence;
- the right to freedom from sectarian harassment; and
- the right of women to full and equal political participation.<sup>99</sup>

In reference to reconciliation the parties also agreed that “an essential aspect of the reconciliation process is the promotion of a culture of tolerance at every level of society, including initiatives to facilitate and encourage integrated education and mixed housing.”<sup>100</sup> In the 2003 UK-Ireland Joint Declaration both governments recognised the importance, among other matters, of “tackling sectarianism and addressing segregation” and recognized:

...many disadvantaged areas, including areas which are predominantly loyalist or nationalist, which have suffered the worst impact of the violence and alienation of the past, have not experienced a proportionate peace dividend. They recognise that unless the economic and social profile of these communities is positively transformed, the reality of a fully peaceful and healthy society will not be complete.<sup>101</sup>

In addition the British government reaffirmed in the UK-Ireland Joint Declaration its Belfast/Good Friday Agreement commitment to measures to combat unemployment and progressively eliminating the employment differential, as well as ‘encouraging’ the devolved administration to accelerate work on this issue.<sup>102</sup> St Andrew’s Agreement in 2006 included a fresh commitment from the British government to actively promote human rights and equality, along with specific commitments to publish an Anti-Poverty Strategy to “tackle deprivation in both rural and urban communities based on objective need and to remedy patterns of deprivation” envisaging this work would be taken forward by the NI Executive. St Andrew’s also provided for measures to enhance the reintegration of ex-prisoners.<sup>103</sup>

The UN Committee on Economic, Social and Cultural Rights (CESCR) is concerned by the persistent levels of deprivation and inequality throughout Northern Ireland. It has also noted the “higher poverty levels among ethnic minorities, asylum seekers and migrants, older persons, single mothers, and persons with disabilities” throughout the UK.<sup>104</sup> CESCR is “concerned about the persistent levels of deprivation and inequality throughout northern Ireland, despite the adoption of the Northern Ireland Equality Impact Assessment.”<sup>105</sup>

Notwithstanding treaty based obligations being the ultimate responsibility of the state party, CAJ notes that many of these areas are now within the competence and responsibility of the Assembly, or it was explicitly envisaged would be taken forward

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<sup>98</sup> Rights, safeguards and Equality of Opportunity, paragraph 2(iii)

<sup>99</sup> Human Rights, Paragraph 1.

<sup>100</sup> Rights, safeguards and Equality of Opportunity, Paragraph 13.

<sup>101</sup> Joint Declaration of the British and Irish Governments, 2003, paragraphs 27-28.

<sup>102</sup> Joint Declaration of the British and Irish Governments, 2003, annex 3 Paragraph 9.

<sup>103</sup> St Andrew’s Agreement 2006, Annex B.

<sup>104</sup> Concluding observations of the Committee on Economic, Social and Cultural Rights, June 2009, *supra*, at para 28.

<sup>105</sup> Concluding observations of the Committee on Economic, Social and Cultural Rights: United Kingdom, 12 June 2009, at para 31.

by the Assembly. CAJ would therefore expect to see explicit reference on measures to take them forward within the PfG.

CAJ notes that some of the above areas fall within the overarching priorities of the draft PfG, in particular, priority 1 in relation to job 'promotion', priority 2 in relation to tackling disadvantage, and priority 4 in relation to better relations between communities. CAJ does note however a number of gaps in relation to the specific commitments entered into. In particular there is no reference or commitments to measures to tackle the employment differential, no specific commitments to reduce unemployment, and no reference to re-integration of ex-prisoners or to tackling sectarianism.

CAJ welcomes the explicit commitment to finalise the Cohesion, Sharing and Integration (CSI) Strategy under priority 4. CAJ considers that CSI would have the potential to address a number of the above matters if many of the issues we outlined in our consultation response were taken into consideration in the final CSI strategy.<sup>106</sup> CAJ therefore urges that this document be finalised as soon as possible if it is to be used as a 'building block' to inform key commitments, and milestones/outputs for this PfG.

However, CAJ notes there are no 'key commitments' to overarching equality strategies in the draft PfG with key strategies such as the racial equality strategy, referenced only as 'building blocks'. In particular there is no commitment to the Sexual Orientation Strategy which was committed to in the draft CSI strategy. A 'Sexual Orientation Action Plan' is referenced as a 'building block'. CAJ is concerned that the strategy for sexual orientation may transpire to be little more than guidance to the existing legislation rather than a strategy *per se*, and requests clarification on this, including a commitment to the Sexual Orientation Strategy in the PfG.

The current Gender Equality Cross-Departmental Action Plan 2008–2011 cycle, which is necessary to outwork the provisions of the Gender Equality Strategy 2006–2016, has ended and yet both a further action plan and the mid-term Gender Equality Strategy Interim Report (2010) remain outstanding. CAJ urges that these be completed if the Gender Equality Strategy is a 'building block' being used to inform the PfG 2011–2015 cycle.

CAJ notes that one of the prioritised areas of the existing Gender Equality Strategy is 'representation in public life/decision making'.<sup>107</sup> As mentioned above, the parties to the Belfast/Good Friday Agreement affirmed the rights of women to full and equal political participation.<sup>108</sup> One of the key human rights mechanisms in a post-conflict society is the application of UN Security Council Resolution 1325, on Women, Peace and Security.<sup>109</sup> UNSCR 1325 urges UN Member States to ensure "the increased representation of women at all decision-making levels in national, regional and international institutions and mechanisms for the prevention, management, and resolution of conflict."<sup>110</sup> CAJ sees clear relevance in the application of UNSCR 1325 to Northern Ireland. This is the view supported by the UN Committee on the

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<sup>106</sup> See CAJ's Submission no. S. 269, CAJ's response to OFMdfM consultation on Cohesion, Sharing and Integration, November 2010 at [www.caj.org.uk](http://www.caj.org.uk) including particular particularly in referent to equality, most-at-risk groups and issues of housing and education.

<sup>107</sup> Gender Equality Strategy, A Strategic Framework for action to promote gender equality for women and men, 2006 – 2016, OFMdfM at [www.ofmdfmi.gov.uk/gender-equality](http://www.ofmdfmi.gov.uk/gender-equality)

<sup>108</sup> 1998 Agreement: Rights, safeguards and equality of opportunity paragraph 1.

<sup>109</sup> United Nations Resolution, 1325, Women, Peace and Security, S/RES/1325 (2000)

<sup>110</sup> *Ibid*, para 1.



Elimination of Discrimination Against Women (CEDAW).<sup>111</sup> CAJ would like to see commitment within the PfG for the NI administration to press the British government to apply UNSCR 1325 to Northern Ireland, and accordingly for an Action Plan to take forward its provisions within this jurisdiction.

## Youth Justice

The Hillsborough Agreement provided for a “[r]eview of how children and young people are processed at all stages of the criminal justice system, including detention, to ensure compliance with international obligations and best practice.”<sup>112</sup> This was then taken forward through the Youth Justice Review.

CAJ suggests that the position in relation to implementation of the recommendations of the Youth Justice Review be clarified in the PfG. As part of a commitment to reduce the level of serious crime a milestone/ output identified is to implement “90% of agreed Youth Justice Review recommendations by 2013/2014.” Firstly, we would ask why the figure of 90% was chosen for the implementation of recommendations and what evidence base supported this. CAJ presumes that the phrase ‘agreed’ refers to the process of public consultation in relation to the Youth Justice Review’s report, but this could be clarified.

Secondly we draw attention to the emphasis placed in the Youth Justice Review of cooperation between government departments, and would suggest this is explicitly reflected in the PfG.

Finally, we would query the appropriateness of this milestone/output as part of the commitment to reduce the level of serious crime. Whilst it is undoubtedly true that children and young people are capable of, and have committed, serious crimes the Youth Justice Review report acknowledged that offending by children tends to be less serious than adults, with common offences including criminal damage, theft and common assault. Therefore, the reference to the Youth Justice Review’s recommendations in this context seems misplaced. (*Priority 3, draft PfG*)

CAJ notes the commitment within the PfG to improve community safety by tackling anti-social behaviour. CAJ would urge that as part of this commitment to tackle anti-social behaviour, consideration is given to repealing Anti-Social Behaviour Orders (ASBOs). As we stated in our submission to the consultation on the report of the Youth Justice Review, we consider that the Review’s failure to examine the use of ASBOs was a major oversight. The Commitment made under the Hillsborough Agreement was for a review of how children and young people are processed at all stages of the criminal justice system. CAJ believes that ASBOs should have fallen squarely within such a review, as breach of an ASBO is a criminal offence that may result in a sentence of imprisonment. We would urge that the use of ASBOs be reviewed to fully reflect the commitment made under the Hillsborough Agreement. (*Priority 3, draft PfG*)

## Prison Reform

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<sup>111</sup> In 2008, in the context of its “particular relevance to Northern Ireland”, expressed regret at the lack of information provided by the UK as the implementation of UNHSCR 1325 and called for the full implementation of UNSCR 1325 to Northern Ireland see CEDAW (Concluding Observations on the UK) UN DOC CEDAW/C/UK/CO/6 paragraphs 254-5.

<sup>112</sup> Agreement at Hillsborough Castle 2010, page 7.

The Hillsborough Agreement provides for “[a] review of the conditions of detention, management and oversight of all prisons” and “[c]onsideration of a women's prison, which is fit for purpose and meets international obligations and best practice.”<sup>113</sup>

CAJ would welcome clarity in relation to the commitment made in the draft PfG to reform and modernise the prison service. We note again that a milestone/output under this commitment is to implement 90% of the recommendations contained in the Prison Review Action Plan within the agreed timescales. Firstly, CAJ would like clarity as to whether the Prison Review Action Plan has already been completed or is still being drafted. We would urge that stakeholders be allowed to feed into the drafting of such an action plan, so that it can fully achieve the level of change that is required in the prison system. We would suggest that consideration be given to the words of the Prison Review Team in their final report, where they state that their recommendations for reform are “a whole and inter-dependent package.”<sup>114</sup> CAJ is confident that the Department of Justice in drafting a Prison Review Action Plan will be cognizant of the need not to view the process of change that is required in the prison system in a piecemeal or incremental way. Secondly, we would query why the figure of 90% was chosen for implementation for the reasons outlined above. *(Priority 4, draft PfG)*

A further commitment under the Hillsborough Agreement was that consideration would be given to a women's prison, which is fit for purpose and meets international obligations and best practice and as was called for in the last CEDAW review.<sup>115</sup> As CAJ stated in our 2010 report on the prison system in Northern Ireland, a separate facility is required and has been recommended many times.<sup>116</sup> The most recent call for a separate facility for women has come from the Prison Review Team who recommended that a new, small facility should be built for women prisoners and that Hydebank Wood is an entirely unsuitable environment for them. As part of the commitment within the PfG to reform and modernize the prison service CAJ would welcome clarity as to whether consideration of a women's prison will form part of this process. Given the repeated recommendations that a separate facility be constructed for women, we would urge that it does. *(Priority 4, draft PfG)*

## Minority Language Rights

The St. Andrews Agreement 2006 commits the British Government to legislate for the Irish language. St Andrew's also led to statutory duties being placed on the Executive to introduce strategies for the Irish language and Ulster Scots. Such matters have been heavily commented on by international human rights treaty bodies with calls for their implementation at United Nations and Council of Europe levels.<sup>117</sup>

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<sup>113</sup> Agreement at Hillsborough Castle 2010, page 7.

<sup>114</sup> 'Review of the Northern Ireland Prison Service: Conditions, management and oversight of all prisons' Prison Review Team Final Report October 2011, p. 5

<sup>115</sup> Para. 20, Concluding Observations of the Committee on the Elimination of Discrimination against Women: United Kingdom and Northern Ireland, 18 July 2008, CEDAW/C/GBR/CO/6, p. 6.

<sup>116</sup> 'Prisons and Prisoners in Northern Ireland – Putting Human Rights at the Heart of Prison Reform' CAJ December 2010

<sup>117</sup> For example see Concluding Observations of the Committee on the Economic, Social and Cultural Rights, 12 June 2009, E/C.12/GBR/CO/5, p. 10 at para 97. European Charter on Regional or Minority Languages, 3<sup>rd</sup> Monitoring report on the UK (ECRML(2010)4), In 2011, the Framework Convention for National Minorities (FCNM) Advisory Committee stated urged “the responsible authorities at all levels to take resolute measures to protect and implement more effectively the language rights of persons belonging to the Irish-speaking community. To this effect, they should develop new,

There is no reference in the draft PfG to Irish language legislation. The PfG should explain whether it intends this undertaking, which engages treaty based commitments, to be taken forward by the devolved institution or referred to the British government for implementation.

Despite constituting legal obligations under domestic law<sup>118</sup> the duties to introduce strategies for the Irish language and Ulster Scots are not referenced as commitments within the draft PfG, but only as ‘building blocks’, nor hence are their targets for their introduction. This should be addressed in the final PfG.

### Parades legislation

The St Andrew’s Agreement provided for the Strategic Review in Parading (the Ashdown Review) which recommended a new decision-making framework on parades should be explicitly based around the European Convention on Human Rights (ECHR) and the “right to freedom from sectarian harassment” affirmed in the Belfast/Good Friday Agreement. Section 2 of the Hillsborough Agreement, which also contained explicit reference to “rights for everyone to be free from sectarian harassment”, as a key principle, was followed by legislative proposals covering matters such as the decision making criteria on parades, which, it was subsequently clarified, were to be based on the ECHR.

Controversial proposals to change the decision-making processes on parades and extend regulation to other forms of public assembly, derailed this process and in the end no legislation was introduced to the Assembly. However it is not clear whether the issue of reforming the decision making criteria on parades<sup>119</sup> to more explicitly reflect the ECHR and freedom from sectarian harassment will still be taken forward. This could be clarified in the PfG.

### Mechanisms to implement international commitments within the competency of the NI Executive

CAJ welcomes the fact that the draft PfG acknowledges the role of international human rights obligations by including reference to the UN Convention and the Rights of the Child (CRC) and the UN Convention on the Rights of Persons with Disabilities (CRPD).

CAJ notes that, under the Hillsborough Agreement, a commitment was made by the First and deputy First Ministers to review and take forward outstanding matters from the St Andrew’s Agreement. A number of commitments remain unimplemented but there is no reference to this work being taken forward in the draft PfG. CAJ also notes the mixed record of the NI Executive into contributing to UK treaty reports to the UN and Council of Europe. CAJ would urge inclusion in the PfG of mechanisms and targets for formally considering and implementing recommendations from such treaty bodies, as well as outstanding matters from the Agreements, which fall within the competence of the devolved institutions.

### The PfG consultation and its equality impact assessment

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comprehensive legislation, in line with the commitments taken in the St Andrews Agreement and their obligations under the Framework Convention” (ACFC/OP/III(2011)006, at para 149).

<sup>118</sup> Northern Ireland (St Andrews Agreement) Act 2000, section 15.

<sup>119</sup> Currently set out in the Public Processions (Northern Ireland) Act 1998.

On a more general note CAJ is concerned about the overall *ad hoc* approach to the PfG and does not find it to be a user-friendly document. At a minimum, a basic programme model includes performance indicators that are specific, measurable, achievable, realistic and time bound, having clear outcomes and impacts in parallel to a reflective budget line, with clearly identifiable resources. This simple model applies to all programming including human rights and equality programming. CAJ urges that the final PfG include these along with corresponding departmental business plans.

Finally, we are concerned that the draft PfG, which will impact widely on many equality groups, has not been informed by an equality impact assessment ('EQIA'). The current consultation on a draft EQIA at a Strategic Level for the draft PFG was released nearly two months after the publication of the draft PfG. This suggests that the draft EQIA was drafted *after* the draft PfG, and so could not inform the proposals contained in the draft PfG. Caselaw in Great Britain<sup>120</sup> has underlined the need for advance consideration of the promotion of equality of opportunity,<sup>121</sup> as opposed to 'rearguard action.'<sup>122</sup> The courts have warned that the "duty must be fulfilled before and at the time that a particular policy is being considered by the public authority in question. It involves a conscious approach and state of mind...Attempts to justify a decision as being consistent with the exercise of the duty when it was not, in fact, considered before the decision, are not enough to discharge the duty."<sup>123</sup>

Committee on the Administration of Justice

February 2012

## Community Arts Partnership



community arts partnership

connecting creativity and community

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Northern Ireland Executive - Programme for Government

<sup>120</sup> In relation to s71 Race Relations Act 1976, which requires public authorities to have due regard for the need to promote the equality of opportunity in relation to race (now s149 Equality Act 2010).

<sup>121</sup> R (Elias) v Secretary of State for Defence [2006] WLR 321, [2006] EWCA Civ 1293.

<sup>122</sup> R (BAPL and Another) v Sec of State for the Home Department and for Health, *supra*.

<sup>123</sup> Brown [2008] EWHC 3158, para 92, and confirmed in Domb [2009] EWCA Civ 941 and many other cases.

## Introduction

Community Arts Partnership was formed in 2011 and is the new trading name of New Belfast Community Arts Initiative (New Belfast), after its merger with Community Arts Forum (CAF).

Community Arts Partnership builds upon the strengths of New Belfast and CAF, two major organisations at the forefront of community arts in Northern Ireland. We take the lead in the promotion, development and delivery of community arts practice, in the belief that the arts can transform our society at a cultural, social and economic level.

New Belfast supported community development through the arts for over a decade. The organisation had a track record of working with communities to develop and run inspiring arts projects, mainly focusing its work in the greater Belfast area. As Community Arts Partnership we continue to deliver arts projects, while extending our arts provision across Northern Ireland.

CAF was the umbrella body for community arts in Northern Ireland and led a significant growth of the sector for almost twenty years. CAF strived to provide greater access to community arts to individuals and communities through various initiatives - support to develop community arts programmes, training in community arts, information and research about community arts, and advocacy for the sector. Community Arts Partnership has now taken over these areas of work, which combined with project delivery will allow the organisation to offer a comprehensive range of services to support community arts in Northern Ireland.

We continue to support communities through our arts workshop programme, with a focus on those most disadvantaged in our society. Our programme provides real opportunities for growth and renewal and celebrates the creative innate talent of the participants. The programme spans across different art forms - visual, performing and verbal arts, and traditional and digital media, and it includes a variety of projects, such as dance, drama, film-making, fashion, crafts, painting, art in public, poetry and story-telling. We encourage as many participants as possible to find their space within the spectrum of community arts, and we promote inclusion and accessibility to our creative workshops, regardless of age, gender, beliefs, ethnicity, political opinion, and sexual orientation.

Our work has been highly valued by its stakeholders. Our arts programme has been prized by individuals, community groups and schools, and attracted the support of major funders, including Arts Council of Northern Ireland (ACNI), Belfast City Council (BCC), Department of Foreign Affairs (DFA), the European Social Fund (ESF) and the European Regional Development Fund (ERDF).

Community Arts Partnership is continuing to develop and implement a variety of services and initiatives in order to support, promote and advocate the community arts sector in Northern Ireland and beyond.

These services and initiatives will comprise:



- Advocacy
- Information
- Research
- Platforms for networking and sharing experiences
- Professional training
- Other initiatives to promote engagement with community arts

These services will primarily benefit community arts organisations, community groups/organisations and artists. They will also benefit educational, public, other arts and voluntary organisations, and the general public. Even if these services are mainly targeted to individuals, communities and organisations in N Ireland, they have a wider geographical appeal at national and international level.

### *Advocacy*

Community Arts Partnership is committed to fulfil a prominent advocacy role in Northern Ireland for community arts. We will promote the profile and the status of the sector, and will aim to inform policy and resource allocation decisions within public institutions.

We will advocate for the sector through:

- contact with Government, councils, arts authorities, centres of learning, community groups, arts organisations and artists;
- fora for advocacy, learning and cultural development;
- information and research about provision and positive impacts of community arts on society;
- attending and hosting events providing opportunities for networking and sharing experiences;
- public talks;
- acting as a central point of contact for the community arts sector

### *Information services*

Community Arts Partnership disseminates information about / relevant to the community arts sector with a focus on N Ireland. This information includes news, issues, initiatives and opportunities (e.g. funding, training, work, volunteering).

This information is available through weekly and monthly e-newsletters, on-line news pages, our staff, mainly from the Information Officer on-site and on-line library

### *Research*

Community Arts Partnership will provide and grow a research base for community arts in N Ireland. Research projects will include a large-scale review of the N Ireland sector via consultations. We will collaborate with other organisations in order to ensure that research is relevant to the sector, and complement and integrate existing research activities. Research papers will be produced and disseminated at local, national and international level.

### *Platforms for networking and sharing experiences*



We will organise a variety of initiatives focussing on community arts, including conferences and symposia in order to offer opportunities for networking, sharing experiences, facilitating and prompting debates. Local, national and international practitioners will be invited to take part.

### *Professional training*

At present we provide training opportunities through our workshop programmes at different levels. Participants from community groups and schools can acquire or improve their creative skills, as well as developing their life and work skills. Community leaders and teachers gain or grow their confidence, abilities and knowledge to deliver creative projects. Artists with a limited experience of working on community arts activities can learn on the field from more experienced artists and build on expertise in this field in view of working as facilitators themselves.

We also offer professional development opportunities to artists working in community settings. These include seminars and workshops a range of topics, e.g. disability awareness, conflict mediation, and working with ethnic minorities.

Over the next few years we will develop additional professional development opportunities with the aim of encouraging and supporting practitioners in the sectors of community arts, arts, community development and education, to design and deliver community arts projects to complement and integrate their activities.

### *Other initiatives to promote engagement in community arts*

We will promote engagement with community arts also through other initiatives, including surgeries about funding opportunities for community arts, on-line database with details of artists interested in working with communities, signposting, direct support to those interested in becoming involved in community arts placements and volunteer opportunities.

### Response

Community Arts Partnership welcomes the opportunity to respond to the Programme for Government. We acknowledge the key priorities in the document following the Northern Ireland Budget and we appreciate that we are working on a much different level of expenditure over the next number of years. The key priorities are to be commended and cannot have been easy to construct based on a reduced block grant from the Exchequer and with the ongoing recession. We welcome the urgency on restoring and regenerating the private sector. We recognise that the finer details within the commitments will need to be disseminated in due course as it is not always clear throughout the document how the mechanics and timescales of each commitment will be delivered.

The five key priorities provided in the consultation document are described as interconnected and interdependent. CAP resonates this through our own work in the community arts and creative sectors as our services cross cut from health and well being, education to employment which we will illustrate throughout our response. Whilst we predominantly represent the community/ participatory arts sector it is important to point out the more general ecology of the full spectrum of creative practice in which community arts organisations and practitioners are inextricably allied and indeed, work.

## Priority 1: Growing a sustainable Economy and investing in the future

Building blocks listed in priority 1 include the Investment Strategy and the Creative Industries Innovation fund. The Northern Ireland Programme for Government for 2008–2011 stated as a key goal the intention of ‘growing the creative industries sector by up to 15% by 2011’. The draft Northern Ireland Executive Economic Strategy sets out five key priorities for the Executive to pursue its ‘long-term vision’ towards 2020. The first of these is ‘stimulating innovation, research and development, and creativity’.

The Draft Investment Strategy breaks down Investment by key sectors outlines the benefits of investment: *‘Investment in culture, arts and leisure makes significant and material contributions to key pillars of the Programme for Government, in particular the economy including cultural tourism and local economic development, health, education and social inclusion. Investing in our*

*cultural assets, our museums and theatres, helps to create a strong sense of place and belonging, affirming our identity and making Northern Ireland a welcoming and interesting place to visit.’*

DCAL secured funding for the pilot Creative Industries Innovation Fund (CIIF) for the period 2008-11 administered by the Arts Council. The fund supported 133 business and 23 sectoral development projects. Priorities for Action under three broad themes were: Innovation in Business; Innovation through People; and Innovation through Sectoral Infrastructure and Knowledge.

DCAL has invested a further £4m over 2011-15 to continue to grow and develop the creative industries. CIIF 2 will provide support for innovative development of commercially viable content, products, services and experiences capable of competing in global markets. Awards to businesses are capped at £10,000 and sectoral development bodies £20,000 however CIIF funds cannot be used as “gap” or “shortfall” funding for projects already in development. To support 200 projects over this period will mean less funding per organisation which will limit some applicants especially those who will be ineligible under the shortfall funding exclusion. The current Inquiry into the Creative Industries by the Committee for Culture Arts and Leisure may well conclude that in order to improve assistance for the sector; that the funding will need to reflect the needs of the sector. While cuts regrettably but perhaps inevitably have to be made across all sectors, this reduced fund could prove to be a disincentive for new creative producers establishing themselves in Northern Ireland.

Access to finance for people within the Creative Industries has become increasingly problematic and the most common reason for banks refusing to lend cited was because the project had ‘insufficient potential or was too risky’<sup>124</sup> It is important that there are support mechanisms for individuals and businesses in order for more creative producers to exploit market opportunities and take risks. The Programme for Government includes a Liquidity fund for small and medium sized enterprises worth £50m in potential loans to companies. While this is undoubtedly welcomed by the private sector, there is still a great deal of unmet need. Many creative businesses

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<sup>124</sup> Northern Ireland Economic Outlook, November 2011; PricewaterhouseCoopers

find it difficult to meet Invest NI client criteria because of the particularly fragmented nature of the sector.<sup>125</sup>

This is pertinent to Community Arts Partnership as we employ many artists who work on a freelance basis across both community arts and creative industries. It is important for the industry to be sustainable to maintain that vitality of the sector and not add to the already higher rates of creative individuals moving to where the work is outside of Northern Ireland. Research has shown that creative individuals working collectively or together in close proximity encourage collaboration as an essential element of creativity and innovation<sup>126</sup>. There are informal creative clusters throughout Northern Ireland and this model thrives with regard to creative input and production process.

The current economic forecasts for Northern Ireland still show that there are low levels of employment and the Department of Employment and Learning Figures have shown a 22% reduction in job vacancies this year. The *Our time Our Place Initiative* outlined in the key commitments within Priority 1 is a good example of cross-sectoral working and will employ many individuals involved in arts and creative industries.

Within the Arts sector there are organisations that support and assist innovation primarily the Institute of Directors and Arts & Business. Community Arts Partnership, as mentioned, is developing more grass roots services to assist smaller community/voluntary organisations and individuals. With this in mind we await the findings from the Inquiry into Creative Industries to ascertain what recommendations have been made to support this sector.

#### Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health

Whilst we are responding to the obvious areas within the programme that affect the arts sector namely Priority 1, our analysis for the Programme for Government concludes that the arts are not limited to just one section or priority of the PFG Document.

Under Priority 2 the document details building blocks to address poverty and tackle disadvantage, address educational underachievement and greater equality of opportunity. We welcome the Social Investment Fund and commitment to invest £40 million to improve pathways to employment, tackle systemic issues linked to deprivation and increase community services which has been identified as a key component within the Programme for Government.

At Community Arts Partnership, our job is *to take the lead in the promotion, development and delivery of community arts practice, to affect positive change and in doing so, enhance the quality of life through arts for disadvantaged and marginalised groups while at the same time providing artists with employment and development opportunities*. Our strategic services are to provide workshops to socially deprived areas while at the same time providing a conduit for which community groups and individuals can access advice and guidance. Community arts can not only respond to policy areas around health, education, older people, young

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<sup>125</sup> Department of Culture, Arts and Leisure. 2008. Strategic Action Plan: Creative Business in Northern Ireland: p27

<sup>126</sup> [http://www.nesta.org.uk/library/documents/Creative\\_clusters\\_print\\_v2.pdf](http://www.nesta.org.uk/library/documents/Creative_clusters_print_v2.pdf)

people, urban, rural and social regeneration but indeed can help frame policy development in all these areas and lead to new creative practices.

We employ artists and empower groups and individuals to sustain themselves through funding opportunities employment opportunities and are currently developing further the training and services available from our organisation. It is important for community and participatory arts organisations to continue to be able to carry out this type of work through public funding and outlets such as the social investment fund which in itself has the following strategic objectives:

- build Pathways to Employment
- tackle the systemic issues linked to deprivation
- increase community services
- address dereliction

Community Arts organisations have for some time offered a platform for greater arts participation, attendance and employment. It is therefore important to stress that existing Community Arts projects already encourage people to obtain alternative educational achievement. Many of our own projects are cross community which has increased better community relations via social dialogue developed through arts not to mention an enhanced cultural tourism offering. If a Programme for Government is about a vision, then the artistic and creative community, as experts in imagining, should have a significant role to play.

Research carried out by Community Arts Forum illustrates how community arts practice and associated outcomes can be relevant to achieving broader high level policy goals:

*'The cultural and creative shift in society and the economy places a growing emphasis on cultural and creative competencies which, if encouraged within communities, have benefits to individual and community wellbeing. Community arts represent a key asset for policy makers to use in achieving changes needed for future social and economic development.'*<sup>127</sup>

With regard to increasing visitor numbers and tourist revenue the document states the significance of the achievement of City of Culture status whilst recognising the deep well of talent and also acknowledging the potential this achievement has for the tourism sector. With the forthcoming major events in 2012 and 2013 there will be an anticipated increase in tourism and visitors over the next few years. Large scale events such as these will undoubtedly generate much needed work for artists and creative types alike and these will also assist Northern Ireland to improve its cultural tourism destination status.

The Social Investment Strategy recognises that investment in social activities, including culture, arts, leisure, libraries and sport, makes an important contribution to the economy, improved health and well being, education, lifelong learning and improved social inclusion – and to the underlying social fabric of communities across the region. The diversity and benefits of the arts are not to be underestimated. Community arts practice here can be a world leader in the export of socially engaged

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<sup>127</sup> The impact of community arts on communities and community development; Research report March 2011 produced for Community Arts Forum (Part of Belfast City Council's Creative Legacies Programme)

artistic development therefore the benefits of CIIF and further investment in this sector offers a real chance for this to happen.

#### Priority 4 Building a Strong and Shared Community

Building blocks included in Priority 4 include Annual Support for Organisations Programme, Arts and Older People, Sustainable Rural Communities and the Investment Strategy. Although there is no mention of support for voluntary and community sector infrastructure including community development; the role of the sector as service deliverer and the importance of the social economy is recognised.

Community Arts Partnership and the greater participatory/community arts sector all feed into these building blocks and in many cases are responsible for the delivery of the services outlined in the initiatives and strategies. As an example the planned reduction of peace walls will require much collaboration and project work and CAP's previous projects included a cross community mural festival which engaged with communities to tackle issues of sectarianism and consider community themes in place of paramilitary images. CAP is now providing projects on a Northern Ireland basis and we are currently carrying out workshops and research projects in a range of areas, with various communities of need including older people (with a focus on dementia), rural communities experiencing isolation and lack of creative engagement, new or establishing migrant communities struggling to find creative means for raising their profile and engaging with more established communities. The great majority of support for this work comes from government revenue funds which must remain secure if such fundamental research and engagement can support the most marginalised through situation, ability or circumstance.

### **Community Foundation for Northern Ireland**

#### **RESPONSE TO PROGRAMME FOR GOVERNMENT 2011-2015 FROM THE COMMUNITY FOUNDATION FOR NORTHERN IRELAND**

1. The Community Foundation for Northern Ireland is an independent grantmaking Foundation with over 30 years experience of working in support of local activism and promoting community-based initiatives to address issues of social

need. The Community Foundation for Northern Ireland welcomes this opportunity to respond to the draft Programme for Government and to consider how community philanthropy can contribute to the work of the Executive.

CFNI appreciates the challenge of developing a Programme for Government within the current economic context. We value the recognition that tackling disadvantage is an important part of economic recovery; and that the Programme for Government states the connection between poverty, social progress, peace, fairness and prosperity.

We recognise the importance of this Programme for Government in asserting the character and direction of devolved government within Northern Ireland and demonstrating the ability of politicians to deliver to their constituents. For this reason CFNI considers that a strong progressive vision grounded on and evolving from the peace process and Bill of Rights programme should be articulated within the Programme for Government.

Because the draft Programme for Government provides a broad indication of the Executive's broad approach with limited detail on the policy building blocks and budget allocation, CFNI's response focused on a number of key issues, relating to the communities with whom we work.

As a social justice philanthropic organisation, which for over three decades has worked with poor, and marginalised communities that are significantly impacted by the conflict, CFNI's primary concern is that these communities are protected, supported and developed during the recession, and participate fully in Northern Ireland's recovery.

## 2. Community Sector Participation

Participation by communities will be central to the success of the Programme for Government. CFNI would welcome a more detailed description including explicit criteria of 'partner organisations' in the operational level of the Programme Arrangements and Delivery Framework, and the extent of their involvement. We would hope to see substantial and genuine participation for the community sector in these structures. While recognising that the community sector is often viewed, along with voluntary organisations, as the Third Sector, we feel that the views of locally-based organisations are particularly important. In addition, the Community Foundation considers that community development is central of progressively improving the lives of poor and marginalised communities; therefore it is important that community development is embedded within the Programme for Government.

## 3. Addressing the Legacy of the Conflict

The Community Foundation believes that it is essential that the Programme for Government should continue to demonstrate a clear commitment to –

Building and sustaining peace in Northern Ireland

Working proactively to address the legacy of the conflict in terms of intra and inter-community relationships, and trauma; and



## Creating a shared future.

We would like to see this articulated explicitly as one of the guiding principles for the Programme for Government, rather than being subsumed under 'Equality'. We further believe that the Executive should seek movement from the UK Government on responding in a positive fashion to the advice put forward by the Northern Ireland Human Rights Commission on the development of a Bill of Rights for Northern Ireland, which would provide a supportive framework and ethos in addressing the legacy of the conflict. Alongside this while the Community Foundation is aware of the pressures on the funding environment, we consider that the resourcing of work around the legacy of the conflict and ongoing challenges faced by communities and groups such as former combatants and ex-prisoners particularly in the areas of poverty, unemployment, and mental health, needs to be transitioned into the responsibility of the devolved Government in Northern Ireland. This requires explicit commitments in the Programme for Government.

4. The Community Foundation welcomes the commitments to address inequalities and the stated aim of building a shared and better future for everyone in Northern Ireland as stated by the First and deputy First Minister, and would hope to support the Executive in realising those objectives.

### 5. Growing a Sustainable Economy and Investing in the Future

The Community Foundation welcomes the commitment made to invest in social enterprise growth which should not only increase the sustainability of the community sector, but will also contribute to the local economy. We are conscious, however, of the need for skills development and pump-priming of small and medium-sized social enterprise. The Community Foundation for Northern Ireland took the initiative of investing in Charity Bank some four years ago in order to promote such developments. We are conscious from our ongoing involvement in the Advisory Committee of Charity Bank in Northern Ireland that there is currently a policy gap in the area of effective support for the social economy that needs to be developed. The Foundation welcomes the commitment to a Community Asset Transfer policy and has been involved in discussions around these issues. However there would seem to be some contradictions around the stated support for such developments and the practical restrictions placed on statutory agencies, such as the Northern Ireland Housing Executive of Local Authorities in seeking to transfer assets to community-based groups. This should be addressed as a matter of urgency.

6. The Foundation welcomes the commitment to encourage industry to achieve a greater level of electricity consumption from renewable energy. We believe that the development of such investment also offers the added benefit of setting standards and protocols for Community Benefit Funds that developers should put in place for the benefit of community action in areas neighbouring Wind Farms and other such developments. We are conscious that the Scottish and Welsh administrations have taken a lead in this area and recommend that the Executive follow suit.

Where Community Benefit Funds have been put in place in Northern Ireland they are generally established on less generous terms than those in Britain. In addition, unlike the situation in Scotland, Northern Ireland has no examples of community ownership, or partnership in, renewable energy developments. The Community Foundation would be interested in working with the Executive, and the appropriate Departments, in pump-priming such opportunities.

7. The Foundation welcomes and supports the proposal to create a Creative Industries Innovation Fund, as well as the financial support to the Derry/Londonderry City of Culture 2013. The Foundation has established the Acorn Fund as a legacy fund for the City of Culture, to promote social enterprise and community engagement in the North-West to build on the energy created through activities over 2013. We would welcome Executive support for this legacy work which will also seek to draw on independent philanthropy.

8. The Foundation is supportive of the completion of a Peace Building and Conflict Resolution Centre at Maze/Long Kesh, but believes that it should be developed as complementary to existing initiatives such as INCORE, Healing through Remembering and related established projects. We also feel that it is important that any such development relates in a positive manner to the strategic role of the Community Relations Council for Northern Ireland and PEACE III supported initiatives. On a practical level it is important that adequate access roads are put in place to service the site and that the local communities around the site can demonstrably benefit from the development.

9. Creating Opportunities, Tackling Disadvantage and Improving Health and Well-Being

The Community Foundation for Northern Ireland has already responded in some detail to the recent consultation on the Social Investment Fund. While welcoming the allocation of the additional resources for deprived communities, we expressed serious reservations about the lack of focus and clarity within the plans to date. We also believe that the implementation of the Fund should be informed by the principles of a shared society, rather than a 'shared out' society.

10. With regard to the commendable commitments to tackle poverty and social exclusion, the Foundation believes the Executive should seek to minimise those measures contained in recent UK Government changes to Social Protection that will increase levels of poverty and social exclusion. The Community Foundation is currently working with 8 local communities in a 3-year programme to monitor the impact of the changes on people and to build community resilience. We would welcome involvement in any longer-term programmes that are developed which might have a lasting impact on need. One particular area that is of concern to us is the impact of debt and doorstep lending, where work has been undertaken in collaboration with the Consumer Council and the Ulster Bank.

11. One area of social need that is omitted from the programme is the often acute need of individuals and groups with limited access to public funding and services. The Community Foundation has worked with the Belfast Multi-Cultural Resource Centre and the Bernard Van Leer Foundation in developing a pilot Child Support initiative for the children of Roma families, it has also been involved in examining the health care requirements of such families. In addition the Foundation has been supported by OFMDFM to pilot emergency payments to individuals without recourse to public monies. We believe that the learning from this work should be considered by relevant officials and reflected in the Programme for Government in order to prevent further social exclusion.

12. Protecting Our People, the Environment and Creating Safer Communities

One of the areas that the Community Foundation would wish to see included in the Programme for Government is priority being given to an effective proactive

Youth Strategy. We are concerned that young people are increasingly been depicted in terms of crime and anti-social behaviour, while we are acutely conscious at community level that young people reflect the fact that they have limited access to resources and activities.

### 13. Building a Strong and Shared Community

The Foundation would welcome the finalisation of a Cohesion, Sharing and Integration Strategy but reiterates the strong concerns and disappointment with the draft Strategy that was circulated for consultation. We believe that the draft Strategy fell far short of the framing of issues, opportunities and challenges that might result in a shared society based on improvement in community relations.

14. The Community Foundation is disappointed that there is no policy priority reflected in the current Programme for Government consultation that will specifically focus on the social inclusion of minority ethnic groups – including the Irish Traveller community.

15. As noted in our earlier comments, the Community Foundation believes that the challenges of achieving a shared society should also take account of the need for the Executive, and the Programme for Government to take urgent steps to mainstream resources for the effective reintegration of political ex-prisoners into society through support for ongoing projects and initiatives. It is not satisfactory that the resourcing of this work remains largely with EU funded programmes. The Community Foundation notes the stated achievements in the area of support for Victims/Survivors of the conflict, but is also aware of some serious concerns being expressed by a range of Victims/Survivors' groups over proposed future strategies.

### 16. Delivering High Quality and Efficient Public Services

The Foundation welcomes progress with the Review of Public Administration and believes that the ongoing delays have served to undermine confidence in the modernisation agenda. We would be particularly supportive of community development informed community planning and well-being powers, and support the application of innovative approaches such as participative budgeting strategies.

17. In considering post 2015 structural changes in governance, the Community Foundation continues to advocate for structures that will maximise active citizenship. The lack of any effective review of the Civic Forum – and the lack of transparency in its sidelining was regrettable. The Foundation would be loath to see a reduction in the means of exercise of citizenship in the name of value for money.

### 18. Monitoring and Review

Given the changing environment the Foundation believes that it is important that the Programme for Government has a strong monitoring and review framework and is sufficiently flexible to respond to new information. This monitoring and review framework would need to both focus on each of the five priorities as well as be cross-cutting, particularly with regard to the fulfilment of the principles of: balanced sub-regional growth, equality and sustainability – and, as we suggest, and additional principle of creating a shared future.

**Community Organisation of South Tyrone & Areas Ltd (COSTA)**  
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Response to OFMDFM Draft Programme for Government 2011 – 2015

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This is the response of Community Organisations of South Tyrone & Areas Ltd (COSTA) to OFMDFM – Draft Programme for Government 2011 - 2015

Introduction

Community Organisations of South Tyrone & Areas Ltd (COSTA) is a non-profit taking Company Limited by Guarantee with Charitable aims and objectives.

COSTA is the Local Rural Support Network (LRSN) for Dungannon & South Tyrone Borough Council area. COSTA is part of the wider Local Rural Support Network infrastructure with the 8 other Local Rural Support Networks (LRSNs), covering the whole of rural Northern Ireland. The LRSNs have a membership of over 800 members.

This infrastructure facilitates the delivery of quality rural community development practice and networking among groups and communities. It is recognised as a strong conduit between rural communities and statutory bodies, providing the key link between accessing the decision making process and the decision makers in our society. This gives government and decision makers an important means of tapping into the local knowledge held by rural dwellers and the grass-roots community of South Tyrone.

COSTA has over 100 member groups and is a rural Networking organisation with links to over 500 local and regional voluntary, community and statutory groups and organisations.

COSTA delivers practical community development support to rural dwellers, rural groups and organisations in our area under our 5 Strategic Aims:

- Empowering the Voice of Rural Communities.
- Championing Excellence in Rural Community Development Practice.
- Developing Civic Leadership in Rural Communities through a Community Development approach.
- Actively working towards and Equitable & Peaceful Society.
- Promoting the Sustainable Development of Rural Communities.

We look upon public consultation as a key opportunity to articulate the (rural) voice of the community in South Tyrone and we believe very strongly in:

- Individual & Community Empowerment
- Self-help
- Local ownership
- Equity & Equality
- Self Determination
- Self Actualisation
- Social Justice
- Human Rights
- Active citizenship, participation & Civic engagement
- Proper and genuine consultation using a highly principled process

As an integral part of the Local Rural Support Network infrastructure. COSTA is committed to acting as honest broker in empowering the people of our community.

COSTA welcomes the opportunity to respond to this public consultation.

## OFMDFM – Draft Programme for Government 2011 - 2015

### Background

We greatly welcome the opportunity to respond to this consultation.

### Rural Poverty & Rural Proofing

Rural dwellers face significant difficulties accessing employment and basic services that other people take for granted. These difficulties are further compounded for rural dwellers that have no access to private transport due to the limited availability of public transport in many rural areas.

- Rural Poverty manifests very differently from poverty in urban areas:
- It is not spatially concentrated;
- It exists amongst relative affluence;
- People in rural communities are less likely to identify they are in poverty and there is a culture of “making do”.

In 2007-08 in Northern Ireland, of those who earned 50% below the United Kingdom (UK) Mean Income Before Housing Costs, almost half (46% of individuals) lived in



rural areas(*Family Resources Survey Urban Rural Report Northern Ireland 2007-2008 (DSDNI)*).

54% of households living in rural areas were in Fuel Poverty.(*2009 Northern Ireland House Condition Survey Statistical Annex NIHE*).

Rural dwellers also face significant difficulties accessing employment and basic services that other people take for granted. These difficulties are compounded for rural dwellers that have no access to private transport due to the limited availability of public transport in many rural areas.

Recent research completed by the Joseph Rowntree Foundation in England has shown that rural households must earn significantly more than their urban counterparts to reach a minimum standard of income due to the need to maintain a car and the higher cost of heating a home in rural areas(*2009 Northern Ireland House Condition Survey Statistical Annex NIHE*).

## KEY POINTS

Overall this document sets out many very admirable strategic aims that are pitched at a high level.

Some outputs are very detailed but others are very vague, unambitious and therefore detract from the document.

We are concerned that the budget appears to have been set first which this document is now attempting to follow.

Overall this document operates in an environment whereby the NI Block Grant is hugely reduced.

It must be remembered that fixing the economy will not solve all ills – a strong focus must still remain on peace, fairness, equality and sustainable local communities.

COSTA would like to see more evidence of cross-departmental working and integration of budgets.

There appears to be no legislative programme for actions that will require legislation.

Generally, we feel that the Legacy of the Conflict is not sufficiently addressed.

*Commitments, Actions and Building Blocks:*Some very high level strategic commitments sit alongside some very specific actions and these are hard to reconcile together in the same document. The direction for many future actions is set but the necessary detail is not always there.

The PfG also refers to “building blocks” which are a series of policies, plans and strategies produced by government departments that will help to deliver the key commitments set out in the PfG. We consider that this approach is incoherent and that the delivery of many of the “building blocks” is much more important than some of the specific commitments outlined in the PfG.

*External Economic Forces:* COSTA is conscious that in a small, open regional economy on the periphery of Europe and subject to global forces, many of the policy

levers are beyond our control but it is important that the Executive works with all sectors to identify the policy changes they can make that will make a difference.

We accept that the context of this PfG is significantly different from its predecessor and that the Executive is working with a substantial cut to the block grant. We welcome the stated commitment to mitigating the worst impacts of the cuts imposed and protecting the most vulnerable and disadvantaged in our society.

We are concerned that the PfG makes little reference to, or analysis of, the impact of the forthcoming Welfare Reforms imposed from Westminster. These cuts will have a devastating impact on the poorest in society and the PfG contains few concrete proposals to mitigate the impact beyond the relatively modest Social Protection Fund.

*Balanced Regional Development:* We welcome the fact that the PfG commits to addressing regional imbalance as we move ahead. The regional development strategy is referred to as a “building block” but the PfG gives no sense that Shaping our Future underpins the document. The concept set out in the 10 year review of Shaping our Future of regional hubs of development is completely absent from the PfG. This is a major concern for the sustainable economic development of rural communities who relate more to their local regional hub than either Belfast or L/Derry.

*Rural Proofing and Equity:* The EQIA does discuss the rural and social impact of the actions proposed in the PfG. Whilst we acknowledge that “rural” is not a Section 75 category, this appears to be an attempt to identify some rural specific work that is carried out by Departments e.g. the DRD Door to Door rural transport scheme. We are concerned that the PfG contains no specific section on, or reference to, rural proofing. The Executive has committed to rural proofing all Departmental policies so that they are considered for their impact on rural communities. If there is found to be a differential impact on rural communities then Departments are required to set out how they intend to mitigate that impact. There is no specific statement on rural proofing within the PfG nor is there consideration within the EQIA that Section 75 groups in rural areas may be more disadvantaged due to lack of access to public transport, services or employment opportunities.

We are very disappointed that no specific commitment has been made to deliver on the Rural White Paper Action Plan although it has been identified as a “building block”.

*Addressing Disadvantage & Social Exclusion:* The commitment to tackling disadvantage is welcomed but COSTA is concerned that this is linked to the hope of rising prosperity in the wider economy that will somehow “lift all boats”. The experience from 2000-2007 should clearly demonstrate that this is not the case. At a time when the NI economy was relatively buoyant, there were large swathes of the population who were still living in poverty either dependent on benefits or in low paid work.

COSTA welcomes the specific commitments to the Social Investment Fund (SIF) and the Social Protection Fund (SPF) but is unable to comment further on these as there is little detail on how either programme will work. COSTA responded to the SIF consultation in December 2011 highlighting the concern that the SIF will have

limited impact in rural areas due to the fact that only one of the proposed zones identified has any significant rural territory.

COSTA welcomes the £13m set aside to tackle rural poverty and isolation through the Anti- Poverty and Social Isolation Programme (APSI). This is particularly important due to the fact that rural poverty is under-estimated. There remains a reluctance to ask for help in rural communities due to the stigma that still exists in rural areas around poverty. The learning from the delivery of the APSI programme in rural areas needs to be disseminated across all relevant government departments so they can ensure their programmes and policies take account of the needs of poor people in rural communities.

*Education:*We welcome the actions identified around shared education. COSTA is particularly concerned that the cuts in education budgets will particularly affect rural communities. Schools in rural areas act, in many cases, as the hub of their communities. The closure of rural schools can have a devastating impact on a rural community and on rural sustainability.

COSTA has been working with the Integrated Education Fund to promote dialogue in local communities around the changes in education. These events have also explored the potential for shared education, in some rural areas, to maintain education provision in the face of continuing budget cuts and pressures for centralisation. We are concerned however that these decisions are already being taken within the individual education sectors and that the Department has been unable to draw all providers within areas together with a view to developing a more strategic review of our educational needs and the size of our schools estate.

COSTA Welcomes:

- A focus on preventative and early-intervention measures.
- The inclusion of social clauses in all public procurement contracts for supplies, services and construction. However, we would like to see a real commitment to the inclusion of proper and meaningful Social Clauses - that will make a real difference to local communities - being built into all contracts in future.
- The commitment to increase the value of exports and support for investment by businesses in Research &Development.
- The commitment to a £50m loan fund to aid liquidity of SMEs which are particularly important in rural communities.
- The commitment to develop a strategic plan for the agri-food sector. This sector is crucially important to providing employment in rural communities and has weathered the recession better than many other sectors.
- The commitment to progressing the DARD HQ re-location to a rural area.
- The completion of a Child Poverty Action Plan based on a Poverty Outcomes Model which attempts to target interventions that will have the most effect in tackling multi-generational poverty and hope that this model can make a contribution to ensuring that SIF and SPF funding is effectively targeted.

We welcome but have concerns:

*Investment in Social Enterprise:*On the one hand it is very positive to see a focus on a sustainable social economy but this must be backed up adequate investment, support and funding for the sector and on a much more long term basis. Supporting the sustainability of local communities must be at the core of everything that is done.

As regards the commitment to invest in social enterprise growth to increase sustainability in the broad community sector. We are concerned that this investment appears to focus solely on Community Asset Transfer (CAT) policies and transferring assets to the community by 2014/ 2015. Whilst this may strengthen the sustainability of some organisations where such opportunities are within their community, others may lack the resources, knowledge or confidence to benefit from CAT. This approach needs to be underpinned by effective capacity building and support for groups to maximise the benefits to local communities across NI.

*Re-organisation of Local Government:*As regards the commitment to establish the new 11 council model for local government by 2015 we are concerned that no reference has been made to the proposed introduction of community planning as an important foundation for participative democracy at the local level.

The changes to local government structures and responsibilities will have major implications for local communities and their engagement with councils and other public bodies. Two of the most important new responsibilities of local government will be (Landuse) Planning and Community Planning. As a result, we recommend that a capacity building programme to enable communities to understand and prepare for the changes should be delivered across the region and should be included as milestones for 2013-2014 and 2014-2015.

*Planning Reform:*There are a number of provisions in the Planning Act 2011 which can be implemented prior to the establishment of new local government arrangements. The Department is preparing a Planning Reform Bill and we recommend that this be included as a milestone for 2012-2013.

The Planning Act 2011 reiterates a Government commitment to a Department of Environment Statement of Community Involvement (SCI). This only requires a commencement order for implementation. We recommend that a Commencement Order for a DoE Statement of Community Involvement be a milestone for 2012-2013.

The Act also makes provision for pre-application consultation on major planning proposals. Provision needs to be made for supporting communities to engage with the Department in the development of the guidance and also its Statement of Community Involvement. We recommend that a community involvement programme be provided in 2013-2014 and 2014-2015 to ensure meaningful community input to the preparation of both pre-application consultation planning guidance and a DoE Statement of Community Involvement.

*Area Plans:*Due to legal and other challenges large parts of the region do not have an Area Development Plan. These challenges have now been exhausted leaving the way clear for the creation of a 'plan-led' framework for the effective functioning of the planning system (as envisaged by the Planning Act 2011). This framework would facilitate economic growth and sustainable development while providing greater clarity for investors, developers and communities. We recommend that milestones be established for each of the next three years to ensure full regional coverage of Area Development Plans by 2015 when the new local council model is established.

*Community Planning & the Power of Well-being:*The new councils will be required to facilitate Community Planning in their areas by engaging communities and working in partnership with public sector agencies. This new power is central to the local government reorganisation policy but is not referred to in the draft PfG. This new

responsibility is designed to deliver improved and more effective public services while also promoting community development and renewal. Statutory guidance on Community Planning will need to be in place prior to the new councils being formed. It should draw on the lessons being learned from pilot Community Planning projects supported by the Big Lottery Fund.

To ensure this is achieved we recommend the following milestones:

- **2012-2013:** pre-consultation on draft Community Planning statutory guidance (informed by good practice here and elsewhere);
- **2013-2014:** consultation with shadow councils and community stakeholders;
- **2014-2015:** introduction of statutory guidance alongside establishment of new councils in 2015.

To enable the shadow councils and community stakeholders to prepare for these new responsibilities capacity building should be provided. A capacity building programme for community stakeholders on local government reform and community planning should be milestones for 2013-2014 and 2014-2015.

*Third Party Appeals:*At the Committee stage of the Planning Bill the Environment Committee supported the introduction of a limited right of third party appeal. In response the Department informed the Committee that the issue would be revisited in the near future. Subsequently a motion supporting the introduction of a limited right of appeal for persons other than the applicant received significant support in the Assembly. The consultation on the draft Planning Bill also engendered considerable levels of support (60% of respondents). We recommend that a milestone for 2012-2013 be the initiation of a public debate on the merits of introducing a third party right of appeal.

*Plans for Interface Areas:*The draft PfG includes a very welcome commitment to seeking local agreement to reduce the number of 'peace walls'. The associated milestones (for the Department of Justice) include developing action plans for prioritised individual areas.

*Addressing Fuel Poverty:*The commitment to introduce Fuel poverty initiatives is very much welcomed but we would like to see further detail on what is proposed. We welcome the commitment to improve thermal efficiency and install double glazing in Housing Executive stock. However we believe that these issues must also be addressed in rural areas where housing conditions are poorer and the majority of tenants are within the private rented sector. Fuel poverty in rural areas can also affect owner occupiers on low incomes and whilst the DARD Anti-Poverty and Social Isolation Framework contains measures to address fuel poverty, this is a relatively modest amount of money.

We feel that the issue of fuel poverty and housing fitness in privately owned homes – particularly of older people - in rural areas requires attention.

Rent control in the private-rented sector must be introduced.

A compulsory Registry of private Landlords needs to be set up.

*Community/Good Relations:*We welcome the commitment to finalise the Cohesion, Sharing and Integration policy and we will comment further when the revised policy appears. Whilst we welcome the commitment to actively seeking local agreement to



reduce the number of peace walls, we are concerned that no recognition is given within this action to the need to address contested space within rural communities.

Segregation is as deep in rural communities as in urban although the physical manifestations of division are much less visible and it is important that the PfG recognises that contested space is as much of a problem in some rural communities as peace walls are in some urban communities.

*Transport:* COSTA welcomes the commitment to progress the upgrade of key road projects, improve the road network and invest over £500m to promote sustainable modes of travel. We would have liked more detail on exactly what the money will be invested in and who exactly will benefit.

The promotion of sustainable modes of travel should take account of the needs of rural dwellers to access employment and services in urban areas.

Solutions should be designed in consultation with rural dwellers to meet their needs and link with current public transport hubs.

Consideration should be given to more park and ride and park and share schemes along major transport corridors.

*Educational Attainment:* COSTA is concerned that the attainment rate for children achieving a minimum of 5 GCSEs is set only at 49%, we believe that this should be higher.

COSTA welcomes the commitment to improving numeracy and literacy but again we are concerned about the need for extra resources to meet the target.

Both these actions are crucially important for economic development and for the individual wellbeing of the children and young people concerned.

*Digital involvement and exclusion:* The commitment to improve online access to government services may be welcome for many rural dwellers, but Departments need to make a realistic assessment of the impact of migrating government services online on the digitally excluded. Whilst this move to online provision may be acceptable for the vast majority of people in other areas, significant numbers of households have no access to broadband, for example, 38% of households in the Western Health and Social Care Trust Area have no access to broadband.

Other commitments we would have liked to have seen.

*Identifiable Measures:* The PfG makes reference to delivering a range of measures to tackle poverty and social exclusion but beyond commitments to the Social Investment Fund and Social Protection Fund there is no indication of what these measures are.

*Peripheral Development – the Border Region:* The importance of North/South and East/West links are referenced but little mention or recognition is made of the border – we feel this document is “Border Blind” as regards the impact and effect it has on rural communities living along its length. There are no specific commitments made in relation to the border.



The border continues to inhibit service delivery and the development of markets especially for larger towns in border areas that are disadvantaged by being cut off from part of their natural hinterland.

Regardless of the political and constitutional issues involved amongst the political parties, the PfG should seek to work with the Government in the South to remove barriers to trade and business development in the border region and identify efficiencies that can be achieved in relation to service delivery.

*Micro-business:*The PfG makes no mention of the need to support micro business. Fear of failure is still a big disincentive in these recessionary times for people who may be inclined to start their own business. The PfG needs to address this if Executive is going to make progress on re-balancing the economy from public to private sector employment.

*Sub-regional development:*The PfG contains little mention of infrastructure development outside of Belfast and L/Derry which is a concern and again reflects the absence of sub regional development as a driver for the PfG.

*Clarity on Community Development:*Whilst we welcome the reference to a Community Development Framework as a “building block” we are concerned that the PfG does not identify an action related to the development of a community development framework and how it might support community development organisations on the ground.

*Outworkings of the Concordat:*COSTA is disappointed that the Concordat between the Voluntary and Community Sector and Government is not referenced within the PfG. The Concordat represents a pathway on how Government and the Voluntary and Community Sector can work together to better serve the people of NI.

The various shared values and principles and the shared commitments contained within the Concordat would be further strengthened with the inclusion of this agreement as a key building block towards new and refreshed structures of engagement between Government and the Voluntary and Community Sector. This will help shape the effective use of resources, including the development of good professional practice and the provision of appropriate accountability.

*Measuring PfG Impact:*COSTA would have liked to have seen a clearer commitment to a transparent process of monitoring and reporting in the PfG both for the Assembly and for the public. The publication this week of the evaluation of the previous Programme for Government in a 160 page document is not a user friendly format to enable citizens to track the progress of each commitment within the PfG.

*Making Work Pay:* COSTA is of the opinion that all work must be made to pay if our economy, society and communities are ever to “be fixed.”

Northern Ireland has an over reliance on minimum wage, low paid, low skilled, seasonal and part time work that largely renders employment as unviable for many of our population. This in turn creates a benefits trap for many people caught in these work patterns but it also means that the tax payer is footing the bill when it comes to subsidising these low incomes.

COSTA is of the opinion that a Living Wage must be introduced as opposed to a minimum wage. As long as Northern Ireland society remains so unequal and imbalanced – we can never ensure a healthy economy, community or individuals.

COSTA

17 February 2012

## Community Places

Community  
Places



Draft Programme for Government 2011-2015

Response by Community Places

### 1. Introduction

Community Places welcomes the opportunity to submit a response to the Draft Programme for Government 2011-2015 (draft PfG).

Community Places is a regional voluntary organisation and registered charity. We provide free, independent and impartial advice on planning issues to people and communities. We also facilitate Community Planning and support communities in developing their own proposals and plans for improving their areas and in responding to development proposals impacting on their community.

Our comments focus on issues within the scope of our role - primarily: planning, local government reform and Community Planning.

## 2. Local Government Reform

The draft PfG milestone for introducing Local Government reorganisation legislation is very welcome and removes uncertainty from this important area of reform. Two of the most important new responsibilities of local government will be (Landuse) Planning and Community Planning. The PfG should include milestones for each of these policy areas (see below). The changes to local government structures and responsibilities will have major implications for local communities and their engagement with councils and other public bodies. A capacity building programme to enable communities to understand and prepare for the changes should be delivered across the region. We recommend that this programme be included as milestones for 2013-2014 and 2014-2015.

## 3. Planning Reform

There are a number of provisions in the Planning Act 2011 which can be implemented prior to the establishment of new local government arrangements. The Department is preparing a Planning Reform Bill and we recommend that this be included as a milestone for 2012-2013.

The Planning Act 2011 reiterates a Government commitment to a Department of Environment Statement of Community Involvement (SCI). This only requires a commencement order for implementation. We recommend that a Commencement Order for a DoE Statement of Community Involvement be a milestone for 2012-2013.

The Act also makes provision for pre-application consultation on major planning proposals. The Department of Environment will be working with two major developments which are receiving public funding to pilot pre-application 2

consultation. The pilots will inform the preparation of guidance under the Act. Provision needs to be made for supporting communities to engage with the Department in the development of this guidance and also its Statement of Community Involvement. We recommend that a community involvement programme be provided in 2013-2014 and 2014-2015 to ensure meaningful community input to the preparation of both pre-application consultation planning guidance and a DoE Statement of Community Involvement.

Due to legal and other challenges large parts of the region do not have an Area Development Plan. These challenges have now been exhausted leaving the way clear for the creation of a 'plan-led' framework for the effective functioning of the planning system (as envisaged by the Planning Act 2011). This framework would facilitate economic growth and sustainable development while providing greater clarity for investors, developers and communities. We thus recommend that milestones be established for each of the next three years to ensure full regional

coverage of Area Development Plans by 2015 when the new local council model is established.

#### 4. Community Planning and the Power of Well-being

The new councils will be required to facilitate Community Planning in their areas by engaging communities and working in partnership with public sector agencies. This new power is central to the local government reorganisation policy but is not referred to in the draft PfG. This new responsibility is designed to deliver improved and more effective public services while also promoting community development and renewal. Statutory guidance on Community Planning will need to be in place prior to the new councils being formed. It should draw on the lessons being learned from pilot Community Planning projects supported by the Big Lottery Fund.

To ensure this is achieved we recommend the following milestones:

- 2012-2013: pre-consultation on draft Community Planning statutory guidance (informed by good practice here and elsewhere);
- 2013-2014: consultation with shadow councils and community stakeholders;
- 2014-2015: introduction of statutory guidance alongside establishment of new councils in 2015.

To enable the shadow councils and community stakeholders to prepare for these new responsibilities capacity building should be provided. A capacity building programme for community stakeholders on local government reform and community planning should be milestones for 2013-2014 and 2014-2015. 3

#### 5. Third Party Appeals

At the Committee stage of the Planning Bill the Environment Committee supported the introduction of a limited right of third party appeal. In response the Department informed the Committee that the issue would be revisited in the near future. Subsequently a motion supporting the introduction of a limited right of appeal for persons other than the applicant received significant support in the Assembly. The consultation on the draft Planning Bill also engendered considerable levels of support (60% of respondents). We thus recommend that a milestone for 2012-2013 be the initiation of a public debate on the merits of introducing a third party right of appeal.

#### 6. Plans for Interface Areas

The draft PfG includes a very welcome commitment to seeking local agreement to reduce the number of 'peace walls'. The associated milestones include developing action plans for prioritised individual areas. Community Places has recently completed action plans for four interface areas of Belfast. These were made possible through the support of Belfast City Council and the engagement of residents, community organisations and public agencies. The plans were endorsed by communities in each of the four areas, identified a series of actions for implementation and were presented to the Council's Good Relations Partnership.

The process used by us to secure community engagement and support for the four interface action plans provides a model which should be drawn on. It is also important that the skills mix (community development and engagement along with landuse planning) brought to the process is utilised for the proposed action plans.

We thus recommend that an additional milestone for 2012-2013 be: draw on recent models of interface action planning in Belfast to build locally agreed action plans for interfaces areas.

Common features of the four interface areas plans are: the need for focused regeneration and co-ordination across different arms of Government (planning, roads, health, etc); addressing the needs of all residents (children, young and older people, unemployed and economically inactive etc) and not just one age group; and sustained community engagement. The evidence is thus that a cross-departmental approach is required. This indicates that responsibility for addressing "peace walls" should be located within OFMDFM (which has the responsibility for the CSI Strategy).

Community Places

20 February 2012

## **Community Relations Council**

**Tony McCusker, Chair, Community Relations Council, Glendenning House, 6 Murray Street, Belfast BT9 5GW 21<sup>st</sup> February 2012 Re: Draft programme for Government 2011-15**

Dear sir or madam,

The Community Relations Council (CRC) welcomes the publication of the Draft Programme for Government 2011-15 and recognises the Programme's potential to create significant, positive change for all the people of Northern Ireland. The stated goal of the Programme, to achieve a shared and better future for all, is at the core of the work of the Community Relations Council and we look forward to working in partnership with the Executive to achieve this. It is also significant that the Programme adopts equality and sustainability as underlying principles of work and commits itself to the ethics of inclusion and good relations. These principles and ethics establish constructive frameworks for delivery with positive outcomes for all.

While supporting the goal, principles and ethics of the Programme for Government, CRC would like to see a greater emphasis on community relations milestones and outputs that will flow from many of the document's key commitments. Committing the Programme to measurable community relations outcomes would help embed community relations in the work of government and make a large contribution to the achievement of the Programme's stated goal.

In particular, we welcome the draft Programme commitments to:

- finalise the Cohesion, Sharing and Integration Strategy to build a united community and improve community relations;
- develop the 'One Plan' for the regeneration of Derry/Londonderry, incorporating the key sites at Fort George and Ebrington;
- deliver a range of measures to tackle poverty and social exclusion;
- actively seek local agreement to reduce the number of 'peace walls';
- significantly progress work on the plan for the Lisanelly Shared Education campus as a key regeneration project;
- establish a Ministerial advisory group to explore and bring forward recommendations to the Minister of Education to advance shared education.

The Community Relations Council would like to express agreement with the First Minister's statement at the Programme launch, that tackling the legacy of division in our community is a key challenge during this Assembly term, and we welcome the commitment to do so. Alongside working to reduce the number and scale of physical barriers, we believe that commitments to tackling the social and economic causes of division are vital. To this end we also welcome commitments to shared education, improved educational attainment, investment, job creation, regeneration of key sites, tackling poverty and social exclusion, improvements to community safety, improving health and wellbeing and access to justice.

CRC recognises that Priority 1 of the Programme, 'Growing a Sustainable Economy and Investing in the Future' can work to improve the lives of everyone in Northern Ireland. We welcome the determination to promote economic growth at this time of challenging economic conditions and want to encourage the Programme to go further – to address the problems set out in the 'Research into the Financial Cost of the Northern Ireland Divide' Deloitte report, commissioned for the NI Executive in 2007. We fully endorse the statement of the Deputy First Minister, who said "equality is also a key factor in economic growth. When people find themselves to be discriminated in terms of their gender, skin colour, political opinion or any other personal characteristic, there is a danger that they will not be able to make their unique contribution to society. Strong economies know that inequality is a luxury which they can ill afford."

The Community Relations Council notes the potential impact of the current decade of commemorations on priority 4 – 'Building a Strong and Shared Community' and believes that the Executive has a key role ensuring that commemorations are a positive experience for all. We have, in conjunction with the Heritage Lottery Fund, developed a range of principles that have been welcomed and endorsed by the Minister for Culture, Arts & Leisure. We believe that building a shared community requires a knowledge of history and an understanding of differing perceptions of the past.

We particularly welcome comments of the First Minister, in a Ministerial Briefing to the OFMDFM Committee, that "it is vital that in commemorating them [upcoming



anniversaries] we do not undermine the very real progress that we are making in Northern Ireland. There is a great opportunity for us to gain a better understanding of each other's positions by looking at the context of history. Perhaps by looking at history from a distance we will come to understand how we arrived at our positions. The centenaries can be positive if we learn to respect and have greater tolerance for the views of others.”

Among the most ambitious and positive commitments in the Programme is the plan to seek local agreement to reduce the number of peace walls. CRC has been involved in this work for a number of years and have been successful in creating partnerships with community partners, statutory agencies, local government and NI Executive Departments. This partnership working has begun the progress of consulting all stakeholders, building confidence among communities, raising awareness of the causes and problems associated with interfaces and creating conditions that have already enabled some interface barriers to be opened. We note that the target timeframe in the Programme to reduce the number of ‘peace walls’ by 2012/14, is challenging and can only be achieved by building on the existing, substantial and successful work in this field.

CRC believes that the proposed delivery framework provides an efficient and effective delivery structure, with clear lines of responsibility and monitoring arrangements. We would like to stress, however, that effective partnership working within the Executive is crucial to the success of the Programme for Government.

While the CRC would welcome a greater emphasis on peace on reconciliation, focussed work on dealing with the past and a commitment to integrated education (over and above the existing commitments to shared education), CRC welcomes the Draft Programme and the approach, priorities and commitments it advocates and offers its support to achieve its goal. The Community Relations Council would also welcome the opportunity to work with government departments in the formulation of their departmental plans of work, where appropriate.

Yours faithfully, Tony McCusker, Chair, Northern Ireland Community Relations Council

## **Conly A**

This is my response to the consultation on the Draft Programme for Government (PfG) 2011–2015.

I am concerned that the Draft PfG lacks an overall vision and is light on key commitments for the natural environment. I believe that the Assembly needs to show the spirit and vision that is needed to make Northern Ireland a leader in sustainability and an example of what local democracy can achieve.

There is an intense focus in the PfG upon growing the economy but this should not be at the expense of the natural environment. Indeed, a healthy environment directly contributes towards a healthy economy – sustainable tourism and creation of the jobs needed to deliver a low carbon economy, are just two examples.

Whilst there are some good things in the Draft PfG, such as a revised Biodiversity Strategy and an Invasive Species Strategy, the document fails to put in place

measures to help deliver them. In addition, there a number of significant gaps in the document that must be filled. I ask that the following targets are included in the PfG:

- A Northern Ireland Climate Change Act, with tangible emissions reduction targets for each sector. Currently we are 99% reliant on increasingly expensive imported energy. If we move to a low-carbon economy with a thriving renewable energy sector our energy supply will be secure, and we will have created thousands of new jobs and attracted major investment. Committing to a Climate Change Act would help us deliver this low-carbon economy.
- The creation of an independent environmental protection agency. This would act as a champion for sustainability and environmental protection, and prevent costly indecision and slow action on safeguarding our environment which leaves Northern Ireland taxpayers repeatedly exposed to the risk of enormous fines for breach of EU environmental law.
- A Northern Ireland Marine Act which ensures a framework for healthy seas and protection for a range of marine species.
- A reformed planning system with sustainability at its heart. I want to see a planning system that can help deliver a thriving economy whilst protecting our natural, built and cultural heritage. All development must be truly sustainable and promote long-term societal benefits, and deliver improved health and wellbeing.
- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of halting biodiversity decline and they also provide a range of other benefits including helping support rural communities by providing financial support to farmers and creating significant socio-economic benefits.

Finally, I want the Assembly to ‘Step Up for Nature’ by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely, A Conly

## **Conradh na Gaelge**

13 January 2012

Dear Sir/Madam,

Please find enclosed a submission from Conradh na Gaeilge and Comhaltas Uladh regarding the Programme for Government that is currently being compiled.

We hope that the proposals below will be taken on board and that they will be included in the Programme for Government.

Yours faithfully,

Julian de Spáinn,

Niall Comer

(Secretary-General of the Gaelic League)  
Ulster Branch of Gaelic League)

(President of

## PROPOSALS FOR THE PROGRAMME FOR GOVERNMENT

from Conradh na Gaeilge and Comhaltas Uladh, 13 January 2012

We propose that languages should be included as core GCSE subjects and, in that way, every secondary level student would select one language for GCSE (in addition to English).

Since changes were made to the legislation governing the curriculum, regarding the provision of languages at GCSE level, there has been a significant drop in the number of students studying languages to GCSE level. In the year 2003, there were more than 2,800 pupils in the Six Counties studying Irish at this level, but in the year 2011 there were only 1,800. A similar decline can also be seen in other languages.

As a result of the lack of emphasis on languages, many schools ask pupils to choose between languages before they start in Year 8. Consequently, certain students go through the second level system without getting the opportunity to study Irish and other languages; the students' educational experience is not as rich as a result.

A lot has been said about the advantages associated with learning a second language. Not only does it enhance thinking skills but it helps students to have a broader understanding of the world and it greatly enhances their employability. In the European context, schools in the Six Counties are falling behind as regards the teaching of languages when one remembers that students in Europe study 2+ languages in addition to their mother tongue at school.

There has always been a strong connection between learners of Irish and the development and growth of the Irish language sector in general. In spite of the significant growth in Irish-medium schooling, it is important that the development and provision of the Irish language in the English-medium secondary school system isn't overlooked because it is of crucial importance.

We propose that Irish-medium secondary education should be developed in areas where there is such a demand and that there should be enough teachers to service those schools.

In recent years in Northern Ireland, there has been a significant increase in the number of parents choosing Irish-medium schooling for their children. Pupils achieve a high level of ability in both English and Irish through the immersion education system.

Research published by the Department of Education in Northern Ireland shows that former pupils of Irish-medium schools attained a higher academic standard than might be expected among the general population of the same age group (Gallagher & Hanna 2002).

Irish-medium schooling has grown significantly in recent years. In 2010 there was pre-school provision in 45 centres with 1,114 pupils attending, primary school provision in 34 schools with 2,818 pupils attending and post-primary education in 3

schools with 732 pupils attending. It is clear that there is a demand in the community for Irish-medium education and there is a gap to fill at post-primary level.

We propose that there should be a robust, comprehensive strategy in place regarding the Irish language in Northern Ireland and that this strategy should be another step in the direction of an Irish language Act.

The strategy should take account of every aspect of society; education at every level; social life; promotion of the language by the family; administration and state services for the community; the media; technology; legislation and the courts; economic and private life; and so on.

The strategy must have ambitious but achievable targets, like those in the Líoifa 2015 campaign. There is a need for more long term targets, however, and we propose that short-term targets (1-3 years), medium-term targets (4-5 years) and long-term targets (up to 20 years) are required. Independent monitoring must be done on the progress of all targets on a regular basis.

An effective structure must be put in place to compile the strategy and achieve its goals. The Department of Culture, Arts and Leisure, inter-departmental committees, and the Irish language community are integral parts of that structure. No strategy will succeed unless the community is a key stakeholder in the process.

It makes sense for targets that are in the 20 Year Strategy for the Irish Language in the south to be included in any strategy in Northern Ireland. There are laudable targets regarding the training of teachers; links to boost the use of the language outside school; county language plans; Gaeltacht network; physical resource centres; labels and packaging; an Irish language radio station for young people; and so on.

This strategy should be a step towards an Irish language Act for Northern Ireland as laid out in the document compiled by Pobal in January 2006 (more information: [www.pobal.org/uploads/documents/act/Act.pdf](http://www.pobal.org/uploads/documents/act/Act.pdf)).

International legislation: Under the Framework Convention for the Protection of National Minorities and the European Charter for Regional or Minority Languages, it is the responsibility of the British government, as well as the Executive and the NI Assembly, to protect the Irish language.

Growing a Sustainable Economy and Investing in the Future – Regarding the rejuvenation of the economy, there are companies and businesses in the north that are functioning bilingually, or that use the Irish language on a daily basis in their business. There are economic and developmental advantages associated with the Irish language, for example in the media, in translation etc and the draft Programme for Government should recognise the importance of Irish and provide help for companies to develop the language element of their business.

Building a Strong and Shared Community – Strong support for the Irish language in the draft Programme for Government would be a big step towards recognising the Irish language as part of a shared cultural richness.

Delivering High Quality and Efficient Public Services – There is no reason for Irish not to be included from the start in any new initiative aimed at improving Public Services; this would facilitate preplanning and avoid time wasting and extra costs.

There are Gaeilgeoirí (Irish speakers) at every level of our Public Services. The Programme should identify these people at the outset and take advantage of such a resource.

The Irish language and its promotion should be one of the core values of the Education and Skills Authority when it is established in 2013.

## **Construction Employers Federation**



The Response of the Construction Employers Federation (CEF) to the Consultation on the Programme for Government, Investment Strategy and Economic Strategy

22 February 2012

### **1. Introduction**

The Construction Employers Federation (CEF) is the representative body for the construction industry in Northern Ireland. The organisation has over 1200 member companies. Member companies range from micro businesses employing a handful of people to the largest construction employers in Northern Ireland. In total, CEF members account for over 70% of construction output in the region.

Construction and civil engineering activities carried out by CEF member companies include:

- Buildings for health, educational and recreational purposes
- Social and private housing
- Transport infrastructure
- Utilities infrastructure
- Domestic minor works
- Repair and maintenance works
- Commercial, industrial and public sector buildings
- Development of public spaces

For more information on CEF please visit our website [www.cefni.co.uk](http://www.cefni.co.uk)

CEF welcomes the opportunity to provide constructive feedback on the draft Programme for Government, Investment Strategy and Economic Strategy.

As these documents are all so intrinsically connected, CEF has combined its response, although we have included some detailed comments on the Investment Strategy.

CEF would welcome the opportunity to follow up with further detail on any of the points raised in this submission.

## 2. Background on the Construction Industry in Northern Ireland

£1 invested in construction produces £2.84 in wider economic activity. Due to this unique multiplier effect construction projects have the power to kickstart the local economy.

Construction output in Northern Ireland has reduced by £1bn from £3.4bn in 2007/08 to £2.4bn in 2010/11. This 30% decline in output has been mirrored by a 30% fall in employment equating to 25,000 to 30,000 jobs lost.

High quality infrastructure is a critical factor in enabling private sector growth. Such growth is necessary if we are to rebuild and rebalance the local economy. Sustained investment in infrastructure has a proven track record of delivering economic growth in many countries around the world.

In 2010, even when the NI Executive had more funds available, preliminary figures indicate that public construction output per capita in Northern Ireland was 16% below the UK average. With that approach to investment the Executive will only increase Northern Ireland's infrastructure shortfall rather than catch up on our neighbours.

## 3. Positive Points in the PfG, ISNI and Economic Strategy

CEF welcomes:

- the fact that the Executive has made the economy its top priority.
- the recognition given by the Executive of the importance of the construction industry and of investment in public buildings/infrastructure to the wider economy.
- the commitment to seek the devolution of, and reduction in, corporation tax.
- the commitments given to proceed with a number of flagship construction projects.
- the commitment to establish clear lines of accountability, monitoring and reporting regarding the delivery of the Programme for Government.



#### 4. Concerns

CEF is gravely concerned that the existing plans will not deliver the Executive's aim of rebuilding and rebalancing the local economy. The Federation has consulted with the leading economists in Northern Ireland and they also share these concerns. In particular we believe that plans suffer from the following weaknesses:

- insufficient focus on addressing Northern Ireland's infrastructure deficit.
- the failure to set targets for increasing the level of funding available for investment in public buildings and infrastructure.
- the absence of detailed commitments on a wide range of specific capital investment projects or repair and maintenance programmes.
- the absence of a commitment to reduce energy usage by improving the energy performance of existing privately owned buildings.
- the failure to put investment in renewable energy at the heart of plans.

#### 5. Improving the Programme for Government, Investment Strategy and Economic Strategy

CEF wishes to work constructively with the Northern Ireland Executive and government officials to assist in amending the Programme for Government, Investment Strategy and Economic Strategy.

CEF proposes that, in order to achieve its aim of rebuilding and rebalancing the Northern Irish economy, the Executive should incorporate the following points into its plans:

Increase funds available for the building and maintenance of public buildings and infrastructure in Northern Ireland by:

- using alternative finance and in doing so take advantage of this period of ultra competitive pricing
- taking steps to allow the citizens of Northern Ireland to invest in their own public buildings and infrastructure for a guaranteed return.
- producing a credible plan for the disposal of assets in order to realise an appropriate level of capital receipts. These plans should be open to scrutiny by key stakeholders.
- redistributing funds from cuts in other areas and linking that redistribution to tangible positive outcomes. For example remove free prescriptions and use the money to undertake specific maintenance projects on a range of health care facilities. Savings made from streamlining the educational governance structures should be redirected into delivering improvements in a number of schools.
- modestly increasing social housing rents and justifying the rise by undertaking a programme of improvements to the social housing stock.
- taking measures to allow borrowing against NIHE stock.
- Introducing new charges or securing tax raising powers.
- Establish a meaningful and detailed investment strategy that provides clarity about which construction projects will proceed, when and with what approximate budget. This should include high level information on repair and maintenance programs as well as major capital projects.
- Set a target in the programme for government to ensure that public construction output per capita in Northern Ireland is 10% higher than the UK average over the budget period.

- Agree a plan by May 2012 with the local construction industry to radically improve the energy efficiency of the existing privately owned housing stock thus both reducing carbon emissions and reducing home heating costs for citizens. The International Energy Agency estimates that £1 invested in energy efficiency measures saves more than £2 through reduced investment in power generation.

## 6. Detailed Comment on the Investment Strategy

In general the draft Investment Strategy places a strong emphasis on heralding past achievements rather than fulfilling its primary purpose of setting the strategy for the future.

Whilst CEF appreciates that setting the scene is important, we believe that the strategy should be rebalanced to place greater emphasis on the future.

As we highlight below, the plans are very vague, limited in scope and often non-committal. In our opinion monitoring the delivery of this strategy in any meaningful way would not be possible.

To demonstrate our concerns by example we have focused our comment on the Investment Strategy section on Networks which covers the plans for investment in transport infrastructure.

We are informed that:

Work will continue on a range of projects including the A6 and the York street junction

What is this range of projects?

What is the timeframe for their delivery?

What is the likely cost?

How will these projects be funded?

A new Regional Transportation Strategy (RTS) will be produced.

When will the new RTS be produced?

How will the RTS fit with the ISNI?

Roads Service will focus its structural maintenance investment on maintaining the condition of the motorway and trunk road network

How much will be spent on structural maintenance?

What percentage of the structural maintenance budget will be spent on the motorway and trunk road network? How will this percentage compare to previous years?

What is the plan for the maintenance of the other roads?

There will be further upgrades on strategic roads

What and where will these further upgrades be?

How much will they cost?

When will they take place?

The transport masterplan for Belfast city centre will be progressed

What progress will be made and by when?

When will the masterplan be put in to action to deliver tangible benefits to the public?

The Derry-Coleraine rail relay works will be completed in three phases.

The document clearly states that the first phase will start in July 2012, further work will be undertaken in 2015 and a full relay should be completed by 2012.

CEF welcomes the fact that at least an approximate timeframe is attached to this project.

How much will this investment cost?

The timing of work on Knockmore to Lurgan rail line will be considered in future budget scenarios

When will the timing of the work be considered?

Will the work itself take place within the 10 year investment period?

How much will be spent on the project?

The potential development of a new Integrated Transport Hub will be taken forward

Is there a commitment to develop a new Integrated Transport Hub?

If so, when will the hub come into existence? What are the milestones in its development?

How much will it cost?

CEF believes the line of questioning illustrated above should be applied to each section of the Investment Strategy.

## 7. Conclusion

CEF and the Northern Irish construction industry look forward to playing a central role in the revitalisation of the local economy in the coming years. In this response we have sought to be constructively critical with a view to helping to improve the Executive's plans.

Finally we would like to reemphasise our willingness to engage further on any of the issues raised in this paper.

## **Consumer Focus Post**

Consumer Focus Post response to the draft Programme for Government 2011-15  
February 2012 Consumer Focus Post response to the draft Programme for  
Government 2011-15 2

### About Consumer Focus Post

Consumer Focus Post is the postal consumer champion in Northern Ireland. Through campaigning, advocacy and research, Consumer Focus Post works to ensure a fair deal for all postal consumers in Northern Ireland.

Consumer Focus Post is part of a non-departmental public body of the Department of Business, Innovation and Skills (BIS), created by the Consumer Estate Agents and Redress Act 2007.

### What are our goals?

Consumer Focus Post has four strategic goals which form the basis of our campaigning to help reduce consumer detriment for all postal consumers in Northern Ireland.

Access – to ensure postal consumers in Northern Ireland have reasonable access to mail and post office services

Service – to engage with postal operators to improve the quality, reliability and efficiency of their postal services

Value – to ensure consumers receive a quality postal service which represents value for money

Sustainability – to work towards the sustainability of Northern Ireland's mail and post office services Consumer Focus Post response to the draft Programme for Government 2011-15

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#### Executive summary

Consumer Focus Post welcomes the opportunity to respond to the consultation on the draft Programme for Government 2011-2015.

The context of our response is aligned with our role to protect the interests of mail and post office consumers in Northern Ireland and looks at how the Northern Ireland Executive can further support these essential services for the benefit of Northern Ireland citizens.

Although the responsibility for postal services is reserved to the UK Parliament, both mail services and post offices fulfil an extremely important social and economic function in Northern Ireland. In this context it is essential that the needs of Northern Ireland citizens are appropriately reflected in any devolved policy decisions or debates affecting these services. Where possible, the Northern Ireland Executive should exert its influence to ensure citizens continue to avail of the benefits provided by these vital services.

Accordingly, the Northern Ireland Executive has an opportunity, as part the draft Programme for Government 2011-15 *building a better future*, to improve the sustainability of the Post Office network in Northern Ireland. In addition, the Northern Ireland Executive should consider how and to what extent it can play a significant role to ensure that an affordable and reliable postal service is maintained for the benefit of Northern Ireland business and social consumers.

In light of this, we believe that the:

commitment to extend the Small Business Rate Relief Scheme with enhanced support for post offices until 2015 is a vital step by the Northern Ireland Executive

that will contribute towards easing the financial pressure on subpostmasters in a difficult economic climate. It is also important that the scheme is continuously reviewed to ensure the criteria used match the changing shape of the network

Northern Ireland Executive should investigate the current provision of both devolved and local government services through the Post Office network and seek ways to provide more of these services into the future. This could include access to *NI Direct* being made available through all local post offices. The benefits of this would be to improve the sustainability of post offices in local communities and help devolved and local government engage with 'hard to reach' citizens

Northern Ireland Executive should make available a Post Office Development Fund similar to those provided by the devolved administrations in Wales and Scotland

Northern Ireland Executive should consider what opportunities exist within this Programme for Government to support the development of a consumer driven postal service provided by an efficient Royal Mail for Northern Ireland

Consumer Focus Post response to the draft Programme for Government 2011-15 5

## Introduction

The Royal Mail Group provides a vital service to consumers across the UK. This is achieved through the Universal Postal Service that ensures the delivery of letters and packets with one-price-goes-anywhere in the UK. Alongside this, the Post Office is an important part of everyday life in communities across Northern Ireland.

An efficient Royal Mail and sustainable Post Office network that work for the benefit of consumers and local communities are important infrastructures in delivering a vibrant Northern Ireland economy and have a valuable role in helping address the issues facing our communities in these difficult economic times.

Like many other public and private sector organisations, both Royal Mail and Post Office Ltd face significant challenges and have entered a period of unprecedented transformation. This is demonstrated by the Postal Services Act 2011 that allows for the restructuring of the Royal Mail Group. This includes provision for the privatisation of Royal Mail and the separation of Post Office Ltd from Royal Mail. Post Office Ltd will remain in public ownership but in due course, the Postal Services Act 2011 also allows for it to become a mutual organisation with subpostmasters, employees, post office customers and local communities having their say in the strategic direction of the business.

Furthermore, in October 2011 under the Postal Services Act 2011 the responsibility of regulation for postal services transferred from Postcomm to Ofcom.

## Post Office network for Northern Ireland

Post offices have considerable social and economic value to many local communities throughout Northern Ireland. They provide access to essential services such as mail services, pensions and benefits, access to cash, banking facilities and bill payments services. These services provided by post offices are particularly important to a wide range of consumers; most notably small business, vulnerable



consumers, those in rural areas, the elderly and people in receipt of pensions and benefits.

Consumer Focus Post research shows that 8 in ten people in Northern Ireland say that the local post office plays an important role in their local community. Furthermore, the post office can and does play a critical role in supporting groups of potentially disadvantaged and vulnerable consumers. As highlighted below our research also reveals the extent of post office usage by these groups on a weekly basis.

- Almost two thirds (63 per cent) for consumers with disabilities
- Almost half (48 per cent) for those aged 55 and over
- Over one third (36 per cent) of rural consumers
- 41 per cent of consumers in the DE socio-economic category

The Post Office network is the largest retail chain in Northern Ireland currently with an estimated 485 branches across the province. Over two thirds (69 per cent) of these branches are located in rural areas. However, the number of post offices in Northern Ireland has fallen by 22 per cent in the 10 years since 2001 and over the same period the network has seen two major UK wide post office closure programmes. Despite this, post offices remain a key part of Northern Ireland's infrastructure and continue to offer unparalleled reach into local communities. Consumer Focus Post response to the draft Programme for Government 2011-15 6

Importantly the UK Government has made a commitment that there will be no further post office closure programme for the foreseeable future and is dedicated to building a long term sustainable future for Post Office network across the UK. As explained in greater detail below we believe that the Northern Ireland Executive can also make an important contribution to the long term sustainable future for the network in Northern Ireland.

#### Small Business Rate Relief Scheme

Under *Priority 1: Growing a Sustainable Economy and Investing in the Future*, Consumer Focus Post welcomes the commitment outlined in the draft Programme for Government 2011-15 to extend the small business rate relief scheme with enhanced support for post offices until 2015. This is a vital step by our devolved administration in playing their part to contribute towards the sustainability of the Post Office network in Northern Ireland and in turn assisting with reducing the financial pressure felt by many subpostmasters. This is especially important when the current economic downturn increases the importance for the continuation of this scheme.

Furthermore, from April 2012 the Post Office network across the UK, including Northern Ireland, will embark on a transformation programme that will see up to 2,000 post offices being replaced by a new operating model called PO Local located within existing or nearby retail premises. Given the importance of post offices within the community they serve it is important that the scheme is continuously reviewed to ensure the criteria used match the changing shape of the network.

Front Office for Government

We believe that the Northern Executive must consider and develop the role of post offices in providing front office for government services at both the devolved and local level. Our forthcoming report examines this in detail, provides an analysis on why this is important and makes recommendations for how to achieve this. With the current new thinking around *NI Direct* and the need for community based delivery of public services, the Post Office network is ideally placed to become a successful 'digital bridge' between Government, devolved and local, and all Northern Ireland citizens.

Some progress has already been made in Great Britain in pursuit of the UK Government's vision of the post office becoming the front office for government services at both the national, devolved and local level. Below are some examples of central government public services which have become available in post offices throughout England, Scotland and Wales, but not Northern Ireland.

10 year Driving Licence Renewal– Using Post Office Limited Application, Enrolment and Identification (AEI) booths, motorists can renew their photo card driving licence

Home Office UK Border Agency to support applications for Biometric Residence Permits – using advanced biometric data capture technology

Under the Department for Work & Pensions (DWP) Post Office Limited can:

~ verify identity as part of the National Insurance application process

~ provide support for jobseekers who live in more rural areas

~ verify supporting documents such as birth and marriage certificates for customers of the Pension Service

On a local authority level, a year-long pilot partnership between Post Office Ltd, Sheffield City Council and the National Federation of SubPostmasters demonstrated that closer engagement would deliver clear benefits for Post Office Ltd, local government and consumers. Consumer Focus Post response to the draft Programme for Government 2011-15 7

Further initiatives are being explored with 25 local authorities in England and Wales. Similar developments are taking place in Scotland following a meeting held with the Scottish Government, Convention of Scottish Local Authorities, National Federation of SubPostmasters and Post Office Ltd.

Considering the progress across GB, the Northern Ireland Executive must ensure Northern Ireland citizens are not left behind. This is especially the case when providing government services through the Post Office network could significantly increase the accessibility of public services for many citizens, especially those that are most vulnerable and disadvantaged.

One such opportunity exists when considering Priority 5: Delivering High Quality and Efficient Public Services specifically relating to the Review of Public Administration (RPA), and in particular the Local Government Reform programme. This presents the opportunity for the potential role of the network to be considered alongside the future range of services provided by local government, and for the channels through

which those services can be accessed by citizens/consumers. This opportunity must be taken.

Consideration should not be confined to local government services but the provision of devolved government services must also be taken into account to establish which of these could be delivered through the network. Successful delivery of such services could lead to the following key benefits:

- Help improve social inclusion by providing a channel through which both local councils and the Northern Ireland Executive can engage with 'hard to reach' citizens that they would otherwise struggle to reach
- Act as a necessary alternative option for those that are digitally excluded by providing a digital bridge for Government departments and local councils wanting to provide more services online
- Improve the sustainability and commercial viability of post offices in local communities allowing citizens to continue to benefit from the social and economic value that post offices offer

Failing to recognise the opportunities that the network offers to provide a local and trusted interface between citizens and public services would be a missed opportunity for the Northern Ireland Executive, local government, the Post Office network and most importantly Northern Ireland citizens.

#### A Post Office Development Fund for Northern Ireland

*Under Priority 2 : Creating opportunities, tackling disadvantage and improving health and wellbeing* Post Offices can play a key role to support a number of the key commitments aimed at improving social inclusion and assisting the most disadvantaged in our local communities.

Post offices remain, and will continue to provide, vital services and serve a distinct social purpose in both our urban and rural communities. While many share this belief, in addition to post office rate relief schemes, the devolved administrations in Scotland and Wales took further action by providing financial support for their local Post Office networks through a Post Office Diversification Fund.

The Welsh fund was launched in January 2009 and continues to support the network. It has made £4.5 million available through the Fund over a three-year period, with subpostmasters able to apply for grants up to £20,000 for capital grant funding and up to £15,000 for revenue costs. In the first year, 75 grants were made totalling £1.55 million. Consumer Focus Post response to the draft Programme for Government 2011-15 8

After an independent evaluation the Assembly Government has judged it to be a major success and the fund has been continued into 2012 to help post offices across Wales expand and diversify their businesses over the next three years.

The Scottish Government launched its similar Challenge Fund with similar objectives and guidelines to that of the Welsh scheme in June 2010. In the first year £1 million was made available and by October 2010, 49 post offices across Scotland benefited from offers of awards of up to £25,000. Evaluation since then has confirmed the success of the Fund and in February 2011 the Scottish Government announced that

a further £1 million has been made available to extend the scheme into the current financial year.

In a recent Consumer Focus Post report called *Consumer friendly post offices? Access, environment and service quality in Northern Ireland's Post Office network*, one of the findings suggests the urgent need of investment in the majority of post offices across Northern Ireland, in particular those located in rural areas. A similar fund to those provided by the Welsh Assembly and Scottish Government would help address this issue and support the sustainability of post offices throughout Northern Ireland and the wider community they serve.

## Mail Services

The primary purpose of *Priority 1* is to achieve long term economic growth by improving competitiveness and building a larger and more export driven private sector. An efficient postal service is therefore a key part of the infrastructure for delivering this priority both as a method of communication and for the distribution of packets and parcels.

Consumer Focus Post has evaluated the performance of mail services in and out of Northern Ireland to underpin the importance of an efficient postal service for Northern Ireland's social and business postal consumers with the neighbouring communities and economies in Great Britain and the Republic of Ireland.

In March 2010 we published our research findings regarding the standard cross-border mail service to and from the Republic of Ireland. This revealed the importance of cross-border mail from Northern Ireland to the Republic of Ireland to Northern Ireland businesses and consumers. To illustrate this, the survey showed one in eight (13 per cent) consumers regularly sent post to the Republic. Furthermore, two in three Northern Ireland businesses (68 per cent) regularly sent post to the Republic of Ireland, with almost half (45 per cent) of cross-border business mailers stating that mail was an essential service for their business.

Alongside this, a parallel piece of research carried out in August 2010 showed that only 80 per cent of First Class mail between Northern Ireland and Great Britain was delivered the next working day compared to a UK wide delivery target of 93 per cent. While Royal Mail is achieving this standard within Northern Ireland, and the United Kingdom as a whole, our research indicates that the performance of mail between Northern Ireland and Great Britain appears to be falling considerably below target. This means that around one in five First Class items posted from Northern Ireland are unlikely to arrive the next working day.

Recent Ofcom proposals on the regulation of the postal service suggest major change for the future of Northern Ireland's postal consumers. Mail services will become more expensive for both business and social consumers across the UK. Consumer Focus Post recognises the need for change with mail volumes continuing to decline, however, the new approach to regulation must deliver an efficient Royal Mail providing a reliable postal service which provides good value for money for all consumers. Consumer Focus Post response to the draft Programme for Government 2011-15 9

## Conclusions and recommendations

At this important juncture the Northern Ireland Executive can help support the Post Office network in Northern Ireland through three main areas. These include the welcomed continuation of the business rate relief scheme with enhanced cover for small post offices but importantly supported by effective monitoring to increase the impact of the scheme; develop the role of post offices in offering a 'front office' for both the devolved and local level government services; and by providing a Post Office Development Fund.

The importance of an affordable, reliable postal service for Northern Ireland is made even greater with its unique geographical location in the UK and as it shares a land border with the Republic of Ireland. In this context, the postal service is critical for the sustainability and growth of the local economy. It is imperative that all consumers throughout Northern Ireland continue to benefit from this essential service. The Northern Ireland Executive can become more engaged in the debate to provide an affordable and reliable universal postal service provided by an efficient Royal Mail to benefit Northern Ireland citizens by liaising with key stakeholders including the department for Business, Innovative & Skills (BIS), Ofcom and Consumer Focus on strategic UK-wide policy discussions.

### Recommendations

Under Priority 1: Growing a Sustainable Economy and Investing in the Future, Consumer Focus Post would ask the Northern Ireland Executive to continuously review the small business rate relief scheme with enhanced support for post offices to ensure the criteria used matches the changing shape of the network

In respect to Priority 5: Delivering High Quality and Efficient Public Services, Consumer Focus Post would encourage the Northern Ireland Executive to investigate the current provision of both devolved and local government services through the Post Office network and seek ways to provide more of these services into the future. For instance, the network is ideally placed to become a trusted local interface for all citizens to access *Ni Direct*. The Northern Ireland Executive should also liaise with the UK Government to establish a clearer role for it in relation to the roll-out of new 'Government Front Office' services throughout the network

Under Priority 2: Creating opportunities, tackling disadvantage and improving health and wellbeing, Consumer Focus Post would ask the Northern Executive to follow the example of Scotland and Wales by making a similar Post Office Development Fund available. The devolved administration in Wales and Scotland have demonstrated the success of such funds and in light of this, Consumer Focus Post believes this fund can deliver similar positive outcomes for the network in Northern Ireland

Under Priority 1: Growing a Sustainable Economy and Investing in the Future, Consumer Focus Post would encourage the Northern Ireland Executive to actively engage with key stakeholders regarding the development of a modern, affordable and reliable universal postal service provided by an efficient service provider that meets the needs of all Northern Ireland consumers

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Consumer Focus Post response to the draft Programme for Government 2011-15

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**Cookstown District Council**





# Cookstown DISTRICT COUNCIL

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COMHARLE CHEANTAR NA COIRRE CRÍOCHAÍ  
DISTRICK COONCIL O COOKESTOWN

22 February 2012

Programme for Government Team  
Office of the First Minister and deputy First Minister  
Room E3.19  
Block E, Castle Buildings  
Stormont Estate  
BELFAST  
BT4 3SR

Dear Sir/Madam

**Re: Consultation Response from Cookstown District Council to the  
Draft Programme for Government 2011-2015**

Please find attached Consultation Response from Cookstown District Council to the  
Draft Programme for Government 2011-2015. Council's response will be ratified by  
Members at our next meeting on 28 February 2012.

Yours faithfully

ADRIAN McCREESH  
CHIEF EXECUTIVE (ACTING)

Enc



**Cookstown**  
DISTRICT COUNCIL

*COMHAIRLE CHEANTAR NA COIRRE CRÍOCHAÍ*  
*DISTRICK COONCIL O COOKESTOUN*

**Consultation Response from  
Cookstown District Council  
to the  
Draft Programme for Government  
2011-15**

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# 1. Introduction and the Strategic Contexts Set by Cookstown

## Introduction

This submission is made by Cookstown District Council in response to the draft Programme for Government 2011-15 (PFG), published by the NI Executive.

The Council welcomes the broad thrusts of the draft Programme and comments in this paper by exception only. Analyses and proposals not commented on here are essentially welcomed by the Council.

## Cookstown in Summary

Cookstown is a growing District located at the heart of NI. It sits at what is the de facto "crossroads of NI" and in the past decade has experienced population growth above the NI average as well as the third-highest employment growth in NI. Continued strong population growth (up by 18%) is forecast to 2021.

The District has a strong tradition of entrepreneurialism and has a vibrant small business-driven economy, albeit a low wage one. It experiences Income and Employment-related deprivation and has particular issues with Access to Services.

Cookstown town is accurately branded as the 'Capital of Mid-Ulster', and is a significant multi-functional regional centre of some 13,000 people serving a sub-regional catchment population of some 120,000. Many larger urban centres in NI do not provide the breadth and depth of urban functions delivered by Cookstown. Crucially, and unlike most other urban centres in NI, Cookstown has achieved its current and growing significance without any significant presence of public sector jobs. It has in fact the lowest density of public jobs in NI.

The town's vigour and significance have been recognised in its designation within the Draft Regional Development Strategy as one of nine sub-regional centres. As a Sub-Regional Centre, Cookstown is earmarked by government for the concentrated development of industrial; commercial; health; education; and community services.

## 2. The Council's Responses

### Introduction

The Council's detailed responses to the draft Programme for Government are set out below. A number of what it believes are strategic, over-arching issues are dealt with first and then key points are made under each of the Programme's five Priorities in turn.

### Implementation and Monitoring

The Council acknowledges that overall responsibility for the delivery and monitoring of the Programme for Government falls to the NI executive. It also believes however that there are important and effective roles that can be played by local government here.

### Overarching Issues

Cookstown District Council first welcomes the draft Programme and fully appreciates its preparation was not easy. For almost 40 years now, NI local government has wrestled with the realities of setting and then delivering budget-based strategic and operational plans. That work is necessary; difficult; and rewarding. Local government's experience and know-how here should be utilised to the benefit of the PFG.

The Council wishes to emphasise a number of strategic issues in its response. These are as follows:

- + Much work still needs to be done in terms of achieving joined-up government in NI
- + Central to that is the whole area of planning and the fundamental need to have in place plans that are soundly-based; up-to-date; and complementary to each other: sadly that can not currently be said to be the case
- + There is an equally fundamental need to use existing mechanisms and structures to the maximum, rather than to keep adding new structures and layers to NI's public governance and service delivery arrangements
- + In all of this, in whatever form/structure it might have at any one time, local government should have a central role: good, working subsidiarity (where decisions are always made as close to the 'front line' as possible) is vital in terms of building a new NI



## Priority 1: Growing a Sustainable Economy and Investing in the Future

### Overview

Although Cookstown is an entrepreneurial place it suffers from a number of economic difficulties, including low economic activity rates (3% below the NI average); low wages (ranked No 24 of NI's 26 Districts); no/poor qualifications (6% 'worse' than NI overall); growing unemployment; the lowest level of public jobs of any District in NI; and a reliance on "old industries" such as manufacturing; construction (both twice the NI averages); agriculture and retail.

One particular local impact of the current recession is a huge increase in emigration of young people, largely to Australia; England; and the USA.

Rebuilding and rebalancing the economy (both stated PfG aims) can only start from where we're at. That means rebalancing the provision and accessibility of education and training; supporting sectors that are successful (even if they are sometimes denigrated as 'old economy'); and concentrating on the reality that NI's economy is an SME-based economy.

### Resultant PfG Requirements

- Upgrading of broadband and mobile phone coverage to ensure coverage across all of NI
- Specific initiatives responding to current emigration levels (eg supporting networks which maintain connections with our people overseas)
- Improved resourcing of Local Economic Development (LED) via Councils; LEAs; and F&HE Colleges
- Increased decentralisation of public resources; facilities; and jobs

### Detailed PfG Comments:

PfG Commitments	Council Response
Promotion of 25,000 jobs and securing of £300m Foreign Direct Investment (FDI)	The location/distribution of these jobs across NI is a key consideration in terms of delivering on the PfG's values of equality and fairness (p 21). To date much of NI's FDI has tended to be Belfast-centric: a much better balance needs to be achieved. With their local presence on-the-ground and their local knowledge Councils (and LEAs and F&HE Colleges) should have a central role within the FDI process.



Increase visitor numbers and tourism revenue	The Council welcomes NITB's 'NI Brand' and 'Visitor Inspired' approaches as it believes they go to the heart of what makes NI (and every part of it) different and attractive. It is simultaneously disappointed however that the 'NI 2012 Our Time Our Place' Initiative seems to be very Belfast/Derry/north coast-centric.
Large scale investment planning decisions	Cookstown's is a small business economy (as is the case across most of NI) and planning delays re small projects are therefore much more of an issue: similar targets for speed of approval should be set for the SME sector
Regional rate increases held at rate of inflation	The Council is concerned that RPA will re-allocate certain functions to local government ... but without simultaneously re-allocating the associated funding; this would have consequences for Council rates increases. The Council believes commitments re Regional Rates need to fully reflect the out-workings of RPA.
Invest in social enterprise growth	The Council welcomes this commitment but would stress that social enterprises are different from standard public and private organisations: the specific social enterprise ethos and business model must be respected. It also needs to be stressed that the vast majority of community/voluntary organisations have no wish to become 'formal social enterprises' (ie adopt a specific business model/trading/service delivery practices) and should not be inappropriately encouraged to go down this road.
Achieve 20% of electricity from renewable sources	Wind is and will continue to be the prime renewable source and wind-farms are and will continue to be concentrated in the west of NI. Government should consider paying a premium to those areas/communities/Councils which carry the disruption (and occasional blight) caused by these wind-farms.
Support 200 Creative Industries projects	The Council has reservations about the actual wealth-creating worth of creative industries

Financial support for 'Our Time Our Place'	As pointed out earlier, the Council feels this initiative should provide opportunities for tourism across NI, thereby building on the NITB's 'NI Brand' and 'Visitor Inspired' approaches
Key roads projects	The need for a bypass of Cookstown town was first identified in the preparatory work for the East Tyrone Area Plan in the late 1960s, Cookstown's designation as one of nine Sub-Regional Centres in NI; its placing at the centre of the proposed 'Mid-Ulster urban cluster'; and the PfG's several Priority 3 commitments to act on climate change and develop sustainable transport all now accentuate the need for the bypass.
Increase STEM uptake	The South-West College's pioneering work in this area should be supported.
Improve GCSE performance	Cookstown's levels of educational performance are below the NI average. The Council is convinced that the fact that several hundred Second-Level pupils have to travel out of the District daily for their schooling is a factor in this. Government is now committed to area-based planning for schools and this needs to be built into the PfG. Equality; fairness; and educational performance issues all argue for a significant investment in Cookstown to bring the area-based model to life here.
Allocate increased funds to public health	The Council fully supports this shift. Part of this increased budget should go to local government to support its pivotal work here in the areas of health and well-being; increased physical activity; and environmental health. These remain the core building blocks of good public health.
Strategic plan for Agri-food sector	The Council welcomes this commitment. Cookstown/Mid-Ulster is home to a very significant agri-food sector and the Council would be pleased to contribute to the development of the proposed strategy.

## Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health and Well-Being

### Overview

In terms of the core measures of deprivation and disadvantage – income; employment; low wages; fuel poverty; educational achievement; poor housing; free school meals; benefits uptake – Cookstown is consistently ‘worse’ than the NI average and frequently considerably so. It experiences similar difficulties re health and well-being, for example in the incidences of limiting long-term illness; disability; life expectancy; and low levels of dental registrations.

Deprivation and disadvantage tend to be multi-faceted, with each part feeding off and contributing to the others. To be effective, responses must therefore also be multi-faceted. In rural areas it is dispersed rather than concentrated, meaning area-based approaches are much less relevant here.

### Resultant PfG Requirements

- Cookstown District needs to be brought within the scope of the proposed Social Investment Fund
- Continued funding of programmes such as Steps to Work and LEMIS
- Anti-poverty work should be taken forward on the basis of local analysis; planning; and the local coordination of responses

### Detailed PfG Comments

PfG Commitment	Council Response
Deliver 8,000 social and affordable homes.	Planning and housing policy needs to properly recognise the vital role played by the ‘rural owner-builder’ in contributing (at minimal cost to the public purse) to NI’s housing supply. The rural ‘one-off house’ price hyper-inflation stimulated by PPS 14/21 needs to be avoided in future.
Fuel poverty initiatives	The Council welcomes this commitment and looks forward to the development of specific costed and funded actions here.
Improve thermal efficiency of NIHE homes.	The Council welcomes this commitment but urges that (a) it be extended to include the 30,000+ Housing Association properties (25% of NI’s social housing stock); (b) initiatives to support similar work in private homes are developed; and



	(c) support is given to the proposed Green New Deal initiative.
Social Investment Fund (SIF)	The Council can not accept the proposed exclusion of Cookstown/Mid-Ulster from the Fund and has already responded robustly to OFMDFM to this effect. It is disappointed that the PfG should propose a commitment to the "8 regions of disadvantage" that were proposed for consultation purposes only by OFMDFM.
Child Care Strategy	The Councils welcomes any initiatives which will improve the availability and affordability of childcare provision.
Tackling poverty and social exclusion	A number of good initiatives are stymied by a lack of integration and joined-up thinking, largely at central government level. Much thinking also tends to be influenced by the incidence and realities of <u>urban</u> poverty; <u>rural poverty</u> is different in terms of its form and distribution and needs its own specific responses. There is also unnecessary duplication: for example the SIF proposals include the introduction of yet more layers of bureaucracy; yet more layers of plans; and apparent duplication of work already being done by initiatives such as Steps to Work; LEMIS; NIRDP; etc. Poverty and exclusion are best understood and addressed at the local level and local government should therefore have a lead role here.
Student fees	For students living beyond essentially 'greater urban Belfast and Derry', student fees are only part of the cost of higher education as accommodation and/or travel costs become increasingly burdensome. Initiatives to address these issues (including public transport subsidies for students and more decentralisation of learning opportunities to F&HE Colleges) should be considered.
Improve literacy and numeracy levels	The planned closure of and/or reduction in local library services will act against this and all other PfG skills and education-related commitments.

Chronic condition management	This is welcomed but it needs to be based on effective and meaningful outreach: centralised and/or acute hospital-based initiatives and services are of little value to and actually discriminate against people in Cookstown/Mid-Ulster.
Tackle obesity	The Council has facilitated a number of initiatives in this area and is keen to continue to do so: it is essential that the vast bulk of the proposed £7.2m funding is allocated to 'front-line/street-level' projects and is not held at the centre.
Rural poverty and isolation	This £13m package is welcomed, with two observations: <ul style="list-style-type: none"> <li>• The lessons re the tardiness of spend in the NIRD 2007-13 need to be learned and addressed</li> <li>• Integration and complementarity with other anti-poverty initiatives (at least eight are listed under Priority 2 of the PFG) is essential</li> </ul>
Relocate DARD Headquarters	The Council welcomes this proposal and has already expressed an interest for Cookstown (and specifically the Loughry site) to be selected as the new location for the DARD HQ. Cookstown currently experiences the poorest level of public jobs provision in NI and should be prioritised for initiatives like this. Greater Belfast is far too 'top heavy' in terms of NI's public sector jobs: the PFG's values of equality and fairness (p 21) should mean more decentralisation to places like Cookstown.

### Priority 3: Protecting our People, the Environment and Creating Safer Communities

#### Overview

Cookstown experiences lower levels of crime than the NI averages and the Council believes this is linked to its strong community infrastructure; its family and kinship patterns; and good civic responsibility and leadership (which are in turn underpinned by structured, focused investment in community facilities and activities).

The Council recognises its central roles in waste management and public health and is committed to playing its part in mitigating the risks of climate change and developing sustainable transportation.

### Resultant PFG Requirements

- Continue to support locally-based community safety/policing partnerships and initiatives
- Need to look at more than just domestic waste (eg commercial and construction waste) in terms of setting targets

### Detailed PFG Comments

PfG Commitment	Council Response
Levy on carrier bags	The Council supports this proposal but believes it should be tied in with other environmental initiatives
Halt the loss of biodiversity	<p>People are a part of biodiversity and the significance and place of rural communities in particular has to be factored in here. Cookstown is home to, among many others, strong farming communities; a unique Lough Neagh shores community; and hill communities in The Sperrins: their contribution to biodiversity must be respected and reflected.</p> <p>OFMDFM's draft Sustainable Development Strategy needs to be accompanied by an agreed Action Plan.</p>
Reduce the environmental impacts of waste	The Council is meeting its existing obligations and is on schedule to meet its planned new obligations: it is essential that Councils are properly resourced to deliver this increasingly important and complex work.
Substantially complete the new Police; Prison; and Fire Training College	The Council fully supports this commitment and will continue to play its part in helping take the project forward.
Tackle crime against older and vulnerable people	Sentencing has a key role to play here but so too have local, community-based preventative measures. The new Police and Community Safety



	Partnerships and Councils should be central to this work – and should be resourced accordingly to do it. The media also needs to be engaged in terms of its contribution to 'fear of crime'.
Tackle anti-social behaviour	This can best be addressed via good, structured local investment in projects such as the Mid-Ulster Sports Arena and in the activities that go on there.
Invest £500m to promote sustainable travel	NI's transport (personal; social; and economic) is almost wholly roads-based and is likely to remain so. Practical and pragmatic work is needed to develop and promote innovative road-based transport solutions which will help reduce the carbon foot-print and greenhouse gases. The Council is convinced the decentralisation of jobs; facilities; and activities out of Greater Belfast and the development of attractive park-and-ride and other opportunities can effectively advance these agendas.
Facilitate walking and cycling to school	This is feasible only if communities have schools within walking/cycling range. Currently over half Cookstown's Second Level pupils are obliged to travel (by bus) out of the District on a daily basis. Implementation of government's area-based planning model for schools is fundamental to the success of this commitment.
Reform/modernise health and social care	NI's HPSS system and structures have now been in a state of continuous flux for some two decades. People find it very difficult to keep up to speed re 'who-does-what-where' and there has been and remains a growing concern about the ability of a re-trenched and Greater Belfast-centric acute hospital infrastructure to deal with even its basic day-to-day workloads. The Council believes that what is needed is a period of stability where people get reasonably rapid access to good, effective services regardless of who they are or where they live: this can not currently be said to be the case. Too many promises previously made re how retrenchment would improve services have simply turned out – as was warned by the Council and others at the time – to be untrue.

Drinking and waste water	Cookstown's drinking and waste water infrastructures have not received the required investment over the past number of years. Housing developments have been stymied as a result and this issue therefore needs to be addressed as a matter of urgency.
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## Priority 4: Building a Strong and Shared Community

### Overview

NI's two 'traditional communities' are well represented in Cookstown and in the past decade some of NI's most significant and robust migrant communities have established themselves here. The Council continues to work hard at making Cookstown a shared place and is proud of what it has done and achieved.

It has also, with significant and welcome central support, invested heavily in sport; leisure; culture/heritage; and the arts, seeing them as core building blocks for social; community; and economic development. The Council's clear experience here is that this work is most effectively delivered by locals at the local level.

More support for this work is urgently required but it needs to be significant and rolled out on a five-year basis, avoiding the 'stop-start', negligible funding approach that has ill-served NI over the past few years. Funding should be needs-based with 'state of readiness' and 'ability to deliver' also factored in.

### Resultant PfG Requirements

- Ongoing 'challenge fund-type' funding opportunities for sport; culture/heritage; and the arts at the local level

### Detailed PfG Comments

PfG Commitment	Council Response
Host World Police and Fire Games	Councils need to be kept aware of these plans; of the opportunities that could arise from them; and of the contributions they (Councils) could make.

Host a significant international Golf tournament	Given that golf is played across NI and that its many local Clubs make major contributions to local quality of life, the Council believes investment in golf should not be limited to a single, one-off (albeit major) tournament
Public realm schemes	The Council wholeheartedly welcomes this commitment, not least because it has its own positive experience of the success of these joint centre/local initiatives. The full potential value here may not be realised however due to the very poor current position in terms of Area/Development Plans in NI.
Finalise Cohesion, Sharing and Integration Strategy	The Council supports this commitment and is keen to play its part in realising it.
Reduce the number of peace walls	The Council feels it is important to (a) proceed on the basis that there is no 'one-size-fits-all' here and (b) recognise that in some places/communities there are invisible barriers and divides that are just as robust as the visible, tangible peace walls
Shared education	The general concept is welcomed however, the current reality in Cookstown (see Priorities 1 and 3 above) is one where there is an unacceptable and debilitating daily 'shared leaving' of the District by several hundred Second Level pupils.

## Priority 5: Delivering High Quality and Efficient Public Services

### Overview

The Council is committed to the principles and practice of providing good public services. Not least because it has to set its own rates and then ask its communities to pay them, it is very aware of the absolute need for value for money. In its consultative and representative roles the Council also has to be familiar with the development and delivery of many other public services. The Council is far from content that its District experiences some of the worst positions in NI in terms of NIMD's 'Access to Services' Measure. Its disappointment grows that there seems to be no



strategy response to these situations but rather that several regional service providers plan instead to with-draw/re-tract further.

The Council welcomes the commitment to a "reformed local government with enhanced powers delivered through a reduced number of Councils" (page 50) and has been working positively with its partner Councils in Mid-Ulster to this end. It remains concerned however that the transfer of powers to Councils may be limited and those powers may not be accompanied by the necessary resources.

### Resultant PfG Requirements

- + A clear focus on increasing the local delivery of services, based on a subsidiarity principle
- + A commitment to robustly review the nature; extent; and location within NI of central government services and functions

### Detailed Comments:

PfG Commitment	Council Response
Social Clauses in public procurement	Public procurement is already very complex and even off-putting for many SMEs. Cookstown's economy is very much SME-driven and the Council is therefore wary of initiatives which create more difficulties for SMEs. The Council however of course fully supports all public procurement being governed by whatever legislative requirements which may be in place at any one time.
Establish the new 11 Council model	The Council welcomes this commitment and has been working to good effect with its partner Councils to this end for some time. It remains very concerned however that the detail and resourcing of the new model of local government are still unclear.
Make the ESA operational in 2013	The Council welcomes this commitment and looks forward to government's previous commitments to an area-based planning model for schools now being rapidly and effectively progressed.
Improve online access to government services	As pointed out under Priority 1 above, too many parts of Cookstown (along with too many parts of other Districts in NI) do not have adequate broadband or mobile phone coverage. If these serious deficits remain unaddressed, this PfG

	<p>commitment will remain a hollow one. SMEs are required to post VAT returns on line from April 2012 ... yet many do not have the broadband provision needed to allow them to do that.</p>
<p>Reconfigure network of health and social care services</p>	<p>NI's HPSS system and structures have now been in a state of continuous flux for some two decades. People find it very difficult to keep up to speed re 'who-does-what-where' and there has been and remains a growing concern about the ability of a re-trenched and Greater Belfast-centric acute hospital infrastructure to deal with even its basic day-to-day workloads. The Council believes that what is needed is a period of stability where people get reasonably rapid access to good, effective services regardless of who they are or where they live: this could not currently be said to be the case. Too many promises previously made re how retrenchment would improve services have simply turned out - as was warned by the Council and others at the time - to be untrue.</p> <p>Cookstown experiences particular difficulties in terms of ambulance response times: it should be a given that those areas/communities furthest from acute hospital services should have the best emergency/first-responder services ... but if anything the opposite is the case.</p>

### 3. Conclusions

As stated earlier, Cookstown District Council welcomes the broad thrust of the draft Programme for Government.

Local government however needs to be given its rightful place in the development and implementation of the PfG. The Council looks forward to working with government and others in the implementation of the final, agreed Programme.



Chief Executive: Jim Clarke

Ref: GW/JC

23 February 2012

Policy Secretariat  
Office of the First and Deputy First Minister  
Room E3.19  
Block E, Castle Buildings  
Stormont Estate  
BELFAST  
BT4 3SR

Dear Sir

Please find enclosed the CCMS response to the Economic Strategy and the Draft Programme for Government.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jim Clarke', is written over a faint, larger version of the same signature.

**Jim Clarke**  
Chief Executive

RECEIVED  
24 FEB 2012  
OFMDFM

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**Programme for Government 2011-15  
and Economic Strategy  
Response of the Council for Catholic Maintained Schools**

RECEIVED  
24 FEB 2012  
OFMDFM

**1.0 Introduction**

- 1.1 The Council for Catholic Maintained Schools (CCMS) welcomes the opportunity to respond to these consultations on the Draft Programme for Government (PfG) and the Economic Strategy. Its response will take a perspective which reflects its key area of interest, education, but it will also comment on those matters which have an influence on the educative process and outcomes or which benefit from their outcomes. In this regard there will be reference also to the Draft Investment Strategy for Northern Ireland 2011-21 (ISNI).
- 1.2 In broad terms the Council welcomes the Draft Programme for Government. It regrets, however, that it did not appear some time ago and in advance of the Budget 2011-18. Indeed Council wonders what changes might be made to that budget when the consultation on the PfG has been concluded and the Programme finalised.
- 1.3 The Council regards Education as an instrumental service in developing and supporting our young people, with the skills, aspiration, vision and resilience to equip them to play a strong and positive role in a constantly changing society and economy. To achieve this education must work collaboratively and seamlessly with other departments of government, the community and voluntary sectors, the providers in further and higher education and employers. There must also be collaboration within schools and between schools. In his 'Homily for World Peace Day' Bishop Donal McKeown stated 'Education for justice means that there can be no place for selfishness and institutional self-interest'. This message applies to schools of all types but it also applies to all those dimensions of society which provide services, particularly those which have relevance for social and economic development. Such services cannot be rationed or provided only to those who have the social capital to demand them.
- 1.4 The global economic downturn has required all nations and regions to look to improve their social and economic influences and the appropriateness of these for an increasingly skilled and competitive world. The Council is concerned that this draft PfG is not as challenging of the current position as it needs to be. The Council acknowledges, however, that the analysis in the Economic Strategy is more analytical and questioning. The main concern is that while there is an appreciation of the weaknesses of our society and economy there is no significant structural re-alignment proposed in the PfG to

address this situation. The Economic Strategy provides a range of actions but it too fails to address the key issues that inequality and the perpetuation of a number of vested interests are not seriously addressed in either the proposals or the associated funding profiles already outlines in the Budget 2011-15.

- 1.5 In Section 1 of the PFG 'Our Commitments' the First and Deputy First Ministers recognise the importance of equality and the fact that inequalities do exist which they will work hard to eliminate. Council would accept that two of the five 'principles' namely 'Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing' and 'Building a Strong and Shared Community' directly address this issue. However, the proposals in the PFG do little to analyse and address the underlying structural conditions which have contributed to inequality and which will require longer term and fundamental structural change. In many respects this sums up the core deficit in the PFG; the reluctance to take a longer term views of structural inadequacies and provide a strategy to confront the actions, processes and conditions which have created them.
- 1.6 In general terms, within the caveats referred to at 1.5, the Council welcomes the five 'principles' outlined on page 21 of the consultation document and the underpinning requirement to create balanced sub-regional growth, promote equality of opportunity, fairness, inclusion and the promotion of good relations and a desire for sustainability.
- 1.7 The Council also accepts as rational the five 'priorities' outlined on page 27 and agrees their inter-relatedness. The document then states that **'All departments at Government must work together to produce policies, plans and strategies – the building blocks – that are consistent with the priorities ...'**. Unfortunately there is little evidence of how this is to be achieved through the Key Commitments. In fact the lack of detail in all three documents on how the strategies are to be realised is a major deficit in the proposals. An evaluation of the last PFG would also have been helpful in contextualising any new proposals. A further concern, emanating from the 'five priorities' section, is the number of 'Building Blocks' and the capacity of the system to align them and deal with them effectively and efficiently to make the intended impact. The possibility of coherence and connectivity would be enhanced by a reduction in the number of policies and strategies. In some cases these are historic with no real action being taken; in others the objectives are being frustrated because the 'joined-up' approach needed is not supported by Government structures.
- 1.8 The Council accepts and supports the principle that in a strategic document not every detail of policy or strategy should be stated. It is concerned, however, that many of the 76 Key Commitments are relatively operational and quite limited in scope. It is also concerned at the use of 'outputs' rather that

'outcomes' and the 'silo' nature of each commitment within a single department. Council would hope that in practice, through the Public Service Agreements (PSA's), there would be lead departments but that there would be shared 'outcomes' with other departments. A requirement for joint planning and the sharing of resources should be indicative of a move towards more interdependent working. This should typify how service delivery should operate in the future.

- 1.9 The following sections comment on the details of the education linked proposals and then present a perspective on what the Council would like to see in the final PFG.

## **2.0 The Education Key Commitments in the Five Priorities**

### **2.1 Priority 1 – Growing a Sustainable Economy and Investing in the Future**

- 2.1.1 The Council welcomes the broad thrust of the Economic Strategy for re-building and re-balancing the economy and is therefore supportive of many of the Key Commitments related to the economy. The kernel is, however, the capacity of Northern Ireland to identify and develop a workforce with the 'flexible and responsive' skills base needed to meet the demands of 'globally competitive employers'. Council supports the vision but is not convinced, either in these Key Commitments or in the Economic Strategy that the 'how' has been addressed. Specifically the Council regards the formal education system and the preparation of children for it as fundamental and critical to delivering the Economic Strategy. It does not see these sufficiently reflected in this Priority.
- 2.1.2 Council strongly agrees the need to 'Increase the proportion of Young People from disadvantaged backgrounds' achieving 5 x GCSE's including English and Maths as an indication of the 'gap' closing. The Council believes that the retention of academic selection is an impediment to both closing the gap and re-balancing the curriculum and therefore it should be ended. It supports the milestones/outputs but believes that unless there is significant structural change as part of an early years and early intervention policies across Government that this PFG is condemning over half of the population to low educational achievement and all that is associated with it. Similarly there is a concern that the focus on English, Maths and ICT, while very important, underplays the need for a wider range of skills in schools and in the workplace.
- 2.1.3 There are a number of Key Commitments allocated to other departments which the Council considers of relevance to education. It agrees the need to 'up skill the working age population by delivering over 200,000 qualifications' but considers that the Department of Employment and Learning (DEL)

working with the Department of Education on an agreed '14-19 Policy' which has been long-awaited but is not featured in the proposals, could in part redress this need. Similarly the Council wonders why the increase in the uptake of Science, Technology, Engineering and Mathematics (STEM) subjects is placed under DEL. Perhaps the proposals to abolish DEL and place some of its responsibilities in education will help address this too. Again the proposal to support 200 projects through the Creative Industries Innovation Fund within the Department of Culture, Arts and Leisure, has implications for schools in that, like so many areas of economic change, the necessary skills and motivation will be harder to achieve if they are not supported in the formal schools' curriculum. Finally, the Council believes that any improvements in public health will only come about when young people continue in education and where there is collaborative working between the relevant departments and the community and voluntary sectors on lifestyle and well-being matters.

2.2 *Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing*

2.2.1 The Council is surprised and disappointed that there is so little reference to education in this critical Priority where, it believes, education has a massive and influential role to play. This is particularly so because in the 'The Means' section reference is made to **'closing the gap in educational underachievement between those who are least and most disadvantaged and improving the participation of young people in education, employment and training'**. This is the Priority where there was a real and rational expectation of a cross departmental initiative to make meaningful structural change through an early or timely intervention strategy to include an early years initiative extending to the preparation and support of parenting. Council continues to believe that until this issue is grasped and addressed there will be no significant closing of the gap and that intergenerational disadvantage will continue.

2.2.2 It is clear from the decision of the Department of Education to fund two pilots linked to Special Education Needs in the pre-school and early years that there is on-going work on early intervention. These pilots also involve health professionals thus exploring the potential for more multi-disciplinary working. It is surprising, therefore, that this work is not reflected in the PfG, as it touches the two important issues in 'closing the gap' through early identification and collaborative workings across departments. These are two characteristics which the Council would like to see as underpinning principles of the PfG.

2.2.3 There are two Key Commitments attributed to the Department of Education under this Priority which the Council broadly supports but with some

amendment. The reference under the Literacy and Numeracy commitment to 'school leavers' suggests that the focus will be on those who are leaving school during the period of this PFG. Clearly the issue is of wider significance and is another example of the need for early identification and amelioration of need from the very earliest days of education. Only through providing the 'building blocks' in literacy and numeracy from the ground up can significant improvement be achieved. This is primarily a long term strategic issue but with some potential for positive intervention and support throughout the formal education period. The provision of at least one year of pre-school education is appropriate but Council believes that the aspiration for all children is that this should be through statutory provision. The Review of Pre-School Admission Arrangements announced by the Minister on 17 January is a positive start. Council believes that pre-school education is a universal entitlement but that children from disadvantaged backgrounds should have any additionality in terms of duration or in terms of access where there is under or limited provision. Council regards all early years provision as critical to providing children with the capacity to engage in and benefit from education.

2.2.4 There are a number of other Key Milestones under this Priority which are not attributed to the Department of Education but which the Council regards as being of relevance to the broad education process. These fall into two broad areas:

- i. Early Intervention and Social Development; and
- ii. Economic Development

A brief comment will be made in each in the following paragraph.

2.2.5 The Council believes that the impacts of social deprivation can only be effectively addressed through structural changes reflected in a long term programme of coherent and connected policies and strategies across government. Short term 'projects' and piecemeal initiatives have had only a limited level of sustained success and may often undermine confidence and resilience. The Key Commitment to deliver a range of measures to tackle poverty and social exclusion is in many ways typical of the 'short-termism' that has resulted in no sustained reduction in the impacts of social deprivation. While Council welcomes the resourcing of initiatives such as the Social Investment Fund and the intention to work across Government there is concern that this is 'more of the same'. It is noteworthy that the last PFG did not achieve its targets in reducing child poverty. In relation to fulfilling commitments to reduce child poverty an action plan needs to be multi-agency in nature, have a time-bound delivery plan with appropriate milestones, monitoring and evaluation procedures and be sufficiently funded.

2.2.6 The Council recognises the disproportionate impact of rising levels of unemployment amongst young people including graduates. It welcomes the commitment to support young people into employment and the associated funding. Its concern, however, is that there is no detail provided despite the recognition to address both the longer term need to re-build and re-balance the economy and the immediate need to provide youth employment reflected in the Economic Strategy. The initiative to provide £40m to improve pathways to employment and tackle systemic issues linked to deprivation through the Social Investment Fund may provide some support for this through, for example, social enterprise initiatives but there does not appear to be sufficient detail as to how this fund can provide sustainable employment or how it sits with the Economic Strategy. The Council fully endorses the proposals on student fees but would go further in proposing creative schemes to encourage entrepreneurial activity over an agreed timescale as an alternative to re-payment. .

2.3 *Priority 3: Protecting Our People, the Environment and Creating Safer Communities*

2.3.1 The Council supports the general intent of this Priority but will comment on only one of the Key Commitments. It sees the proposals on creating the conditions to encourage more young people to walk or cycle to school as consistent with its views on the value of education as a community based service and to the principle of Area Based Planning. The Council sees significant potential for the Department of Regional Development to work closely with the Department of Education to promote the concept of young people growing up in and growing out from their communities by the provision of safer routes to school thereby curtailing the reliance on school transport and reducing this head of expenditure.

2.4 *Priority 4: Building a Strong and Shared Community*

2.4.1 This Priority contains a number of Key Commitments attributed to education but the Council will also comment on some others which have a relevance to education.

2.4.2 The Council is on record in its support of the Lisanelly Campus and considers that the milestones outlined in the PFG are appropriate and achievable provided that the resources are made available. The proposal for a Ministerial Advisory Group to explore and bring forward recommendations to advance shared education is accepted by the Council. It believes, however, that practical steps taken by sectors working together in the context of Area Based Planning and the full implementation of the Entitlement Framework will create many of the conditions and circumstance to advance shared education on a



pragmatic, rational basis predicated on the active support of communities rather than gestures to satisfy a political agenda. Similarly the Council regards the commitment to increase participation in 'shared education' as a natural development of coherent curricular and estate planning and a desire to use such contact as constructive and relevant to education - not as an end in itself. The Council is fully supportive of schools sharing facilities, staff or resources as a means of ensuring that all young people have access to a full curricular entitlement, sporting and cultural resources and community based activities. This should acknowledge the distinctive ethos of each sector and create the conditions for celebrating difference. CCMS is also a strong advocate of schools as a community resource which should be available to both outreach and support education and for broader social and community uses.

- 2.4.3 The Council believes that an overarching strategy on Cohesion, Sharing and Integration (CSI) is important in giving context to the Department of Education 'Community Relations, Equality and Diversity in Education' (CRED) policy. This would further strengthen the practical aspects of 'sharing education' if the revised (CSI) emphasised the conditions for measured but progressive steps which reflected the readiness of communities and their representatives to engage together. It is through such guided activity that the issue of 'peace walls' might be successfully addressed.

2.5 *Priority 5: Delivering High Quality and Efficient Public Services*

- 2.5.1 The Council accepts that the 'value for money' aspects of public service delivery will be an expanding theme over the period of this Programme for Government. The challenge is to ensure that quality of service is maintained and improved. The Council therefore supports the Key Commitments under this priority but considers that the effective and efficient use of resources to provide public services will not be fully realised without a radical change in how Government is organised to deliver services. This Council has long advocated a cross-departmental, multi-agency approach to dealing with issues in a seamless manner where the accountability for outcomes is shared and where the 'red tape' of Government is proportionate to both the nature of the activity and requirements of good governance.

- 2.5.2 The only commitment which is attributed to education under this Priority is the creation of the Education and Skills Authority (ESA) by April 2013. The Council has supported Trustees in their engagement with Government to ensure that the legislation governing the ESA and its operational functions meet the needs of Catholic education. The Council supports the creation of non-statutory, funded sectoral support bodies for all sectors to work collaboratively with the ESA in the provision of high quality education services. A number of commitments have been given by Government on the

recognition and development of the ethos of Catholic education and the rights of Trustees which Council would expect to be honoured.

- 2.5.3 The CCMS has, over recent years, allocated significant resources to improving staff attendance levels in its schools and is currently well below the targets referred to in the Key Commitments. This is important work which needs to be continued so that young people can benefit fully from their time at school and those staff at work are not over-burdened by the consequence of the absence of colleagues.

### 3.0 The Economic Strategy

- 3.1 The Council believes that the Economic Strategy is a vision statement which identifies key elements necessary to the re-balancing and development of the Northern Ireland economy up to 2030. Its concern, however, is that the document does not recognise to a sufficient degree the need to put in place the foundations necessary to realising the vision. Specifically there is only a very limited reference to the formal, school-based education system. At 3.3 the document states:

***'In all cases, the need to develop a world class education and skills system is critical for economic growth'***

Council concurs with this view but considers that there is insufficient reference to education generally, the curriculum offer needed to develop the skills base, the means to change mindsets to direct career aspirations into emerging areas of economic activity and the social policies necessary to address underachievement and other aspects of disadvantage as impediments. In respect of all of these issues it is encouraging that the Minister for Education now sits on the Executive's Economic sub-group.

- 3.2 The Council believes that there is a need for long term structural change to address two underpinning weaknesses in society and the economy. These are:
- i. A concerted strategy to address the impacts of poverty and social deprivation on significant generations of families by refocusing policies and resources to intervene early or in a timely manner to prevent the causes of failure, underperformance or underachievement from emerging. This concept applies across all areas of provision. In education it has particular relevance for the early years of a child's life from 0-6 and for the period leading up to parenthood. The strategic emphasis should move from attempts to cure or ameliorate problems to preventing their causes. This could create sustained transformation in communities where underachievement is endemic.

ii. The economy is not sufficiently productive or competitive with other countries in part due to a cultural aspiration for and reliance on the 'professions' which are largely public sector funded. The school curriculum has tended to support preparation for the traditional 'professions' which favour those with social capacity. There is a continuing propensity by employers and higher education providers to support this position. There is limited evidence of government, economic planners and employers taking full account of the fundamental importance of the formal school curriculum in determining the skills needed to produce a modern, export led, productive economy yielding high end jobs with attractive salaries. However, there does appear to be some evidence of a growing currency for 'vocational' degrees. The critical point is that to re-balance the Northern Ireland economy there needs to be a full engagement of the formal education sector in developing the aspirations and skills needed to deliver that economic vision. Another dimension of this is to encourage schools to align their curriculum offer to local as well as regional economic activity.

3.3 There is, additionally, a need for a reappraisal of how public services are configured and delivered. Priority 5 identifies some basic steps but the real difference can only be made when departments of government are required by the Programme for Government to work together with the community, industry and private sectors to pool expertise and resources to achieve agreed outcomes. The current austere environment should provide the driver for such change so that service levels can be maintained and improved by exploiting efficiencies and economies. The Economic Strategy does attempt to present a vision and some aspects of strategy for economic growth but there is no evidence of a coherent social policy to direct priorities across government, nor is there an evidence base to support many of the key commitments in the PFG. Both the economic and social policy aspects are important for education as an 'instrumental' service through which real success can only be achieved in collaboration with other service providers. The current draft of the Programme for Government fails to set a coherent vision and implementation strategy but the potential is there to review this before the programme is finalised.

3.4 The Economic Strategy does have a longer term vision in that it seeks to identify priorities for sustainable growth for the period up to 2030. The Council, while acknowledging some rational and constructive proposals, is somewhat disappointed that it does not provide sufficient direction or detail on how many of the aspirations of the strategy might be achieved or delivered. In particular the Council would again note the general absence of an understanding of the role of the formal, school-based, education system in

changing priorities and perspectives to motivate young and those such as parents, teachers and peers, who influence them to embrace the emerging skills need. The existing economic profile in Northern Ireland is the product of an education system which has valued the academic curriculum over the applied curriculum. The curriculum bias has been towards academic subjects preferred by those professions which have tended to be directly or indirectly public sector funded. If there is to be any noticeable re-balancing of the economy the curriculum offer in our schools has to change and, in particular, the middle class will have to be encouraged to see the future through a range of flexible skills which will lead to different career choices requiring different subjects and courses to what was aspired to by past and indeed current generations. The challenge to the security of the public sector will need to give way to a more 'risk' based range of private sector or 'entrepreneurial' careers and aspirations.

3.5 The Council, as already stated, fully concurs with the statement at 3.3 of the Economic Strategy. There are, however, some inconvenient truths which have to be faced if real and sustained growth in the economy is to be achieved. Perhaps the most important is to dispel the myth that Northern Ireland has a world class education system; it does not. In terms of the OECD sponsored PISA research Northern Ireland is only 'average' in reading and maths and slightly above average in science. While performance, including that by young people from socially deprived backgrounds, has improved in recent years our competitors have improved at a faster rate. In real terms the gap between the highest and lowest performance in Northern Ireland is not closing. This highlights both the need for an over-arching social policy to address disadvantage and the existing bias in our education system towards a middle class, profession focused and public sector funded career aspiration. A further factor is that many of our most able school leavers and graduates leave Northern Ireland because their career aspirations, particularly in the high end, high salary sectors, are not available here. In real terms Northern Ireland is a net exporter of its talent. The reference at 5.14 to DEL's 'Success through Skills – Transforming Futures' research to skills being 'the bedrock of an innovation – based knowledge economy from the schools system, to further and higher education and lifelong learning' is something which has to be placed above the narrow focus which has brought about the current economic profile. Similarly the target areas for potential growth outlined in paragraphs 1.14 to 1.19 need to be interpreted into the school's curriculum to ensure a greater synergy with the new opportunities in the local, regional and global economies. Pursuing those objectives and creating the conditions to realise them is the most effective strategy for ending the sterile debate on academic selection.

3.6 The target areas accessed through the STEM (Science, Technology, Engineering and Maths) subjects need to have wider application to the private

sector and to research and development. At present the main beneficiaries of students with STEM qualifications are the medical and related professions, the civil service and the public service; all largely funded from the public purse. The Council recognises that job security and earnings levels are better in these areas than in many parts of the private sector, even in high skill domains. This has to change by making private sector more financially attractive so that Northern Ireland can utilise the undoubted talent of its young people to further exploit the markets in Telecommunications and ICT, Life and Health Sciences, Agrifood, Advanced Materials and Advanced Engineering identified by the MATRIX panel. The current curriculum model caters for some of these sectors more than others with Science and Mathematics more widely supported than Technology and Engineering, particularly in grammar schools. The Council believes that other potential growth areas such as Business and Financial services, Tourism and the Creative Industries also need support through the formal school curriculum in advance of further and higher education or training.

- 3.7 The Council agrees that the economy has traditionally been under-represented in the higher value added sectors. It believes that a change in the curriculum offer alone will not alter that position by itself but it is a necessary starting point. There does need to be investment, possibly supported by Invest NI, in encouraging companies seeking high level skills to locate in Northern Ireland, offer good salaries and provide a degree of stability if the high quality outputs of talented and able young people from our schools is not to be lost to regional and global competitors. This requires a coordinated process involving policy makers, employers, funders, including banks and the private sector working with all parts of the education service to deliver some 'success stories' to justify and reinforce a change in aspiration to embrace the development of a flexible range of skills. Included in this suit of actions might be an imaginative leverage of the repayment of fees requirement by, for example, diminishing or suspending repayment for those students who engage in setting up high skill businesses and sustain these over a specified period of time.
- 3.8 It is critically important that all young people and particularly the most able can, through the education system, see a future for themselves in Northern Ireland. Careers advice needs to become more expansive in its capacity to explain and position the emerging economy and elucidate its related opportunities to these young people. While there may be constraints within a small country with a small economy in global terms there are also characteristics which can allow for the development and growth of niche markets. It is equally important that careers advisors or similar should have a role in advising the governors and senior professional leaders in schools on the economic vision and the curriculum needed to address emerging skill demands. Such advice should also recognise the specific and unique

economic characteristics of both the major population hubs of Belfast and Derry and the sub-regional requirements where the economic profile is different. The recently published draft 'Investment Programme for Belfast' and the 'One City, One Plan, One Voice' plan for Derry exemplify the importance of the two metropolitan areas both for themselves but also for the whole of the country. In many respects they are more relevant in describing connected action but again both have failed to express the fundamental role of education.

- 3.9 A critical and immediate action plan is needed to address the growing problem of youth unemployment. Research by DEL has identified that there are 48,000 Young People are 'Not in Employment, Education or Training' (NEETS) with 38% experiencing personal barrier such as educational underachievement, illness, disability or a criminal record. This number has grown by 20% over the past five years with indications that it will accelerate further. This despite a reduction in the number of school leavers. In addition to the general risks outlined below there is the challenge of ensuring that young people are not attracted by paramilitarism and criminality. The risk of losing a sizable proportion of a generation to unemployment will have a detrimental economic and social consequence far into the future. Similarly the prospect of 'under-employment' when job opportunities are not commensurate with the qualifications of young people can also have a de-stabilising effect. This is a growing phenomenon amongst the graduate population which, when considered alongside the 'fees' issue is a particular challenge to young people from socially deprived backgrounds. The Council welcomes the limited steps under Priorities 1 and 2 of the PFG but cautions that the motivational driver of high earning employment through education will be undermined for succeeding generations if the value-added of high quality qualifications is diminished.
- 3.10 The preceding paragraphs have reflected some of the Council's strategic perspectives on the PFG and the Economic Strategy. There are also a number of gaps in what the Council would have expected in relation to education in the draft programme. Some of the issues listed below have been referred to already and some are the subject of on-going work within the Department of Education the Department of Employment and Learning or the Department of Enterprise, Trade and Investment. The Council considers that these are important matters, particularly at this time of renewal in the education sector. The economic issues include the following;
- An encouragement for employers to be more specific in their recruitment specifications for employment to guide young people in the choice of courses qualification and skills which are required and thereby link the education system more overtly to the economy.



- An agreed 14-19 policy to ensure that at the interface of formal education and higher/further education and employment there is a focus on the economically necessary skills, subjects and courses which will rebalance and rebuild the NI economy.
- A communications strategy to alert young people, parents and teachers to the need for changed expectations and aspirations in our economy in order that they will make career choices which are less reliant on the public sector funded professions and more focussed on entrepreneurial activity and 'production' in the widest sense.

#### **4.0 Proposals for Amendments to the Programme for Government**

4.1 The Council regards the Programme for Government as a statement of the strategic intent of the Executive and Assembly and would not expect to see every detail of policy included. There are, however, a number of education issues which Council has identified and which it believes should be addressed as a consequence of this consultation.

4.2 Beyond the high level Social and Economic policies to initiate a process of longer term structural change and the necessity for consortium working across departments of Government, the private sector, the voluntary and community sectors the Council believes that there are a number of key educational 'gaps' in the PFG. These include:

- A funded programme of pre-natal and early years support for parents based on the principle of proportionate universalism to create the conditions, particularly in areas where there are high levels of social deprivation, to allow children to fully benefit from a coherent, cross-departmental and funded 0-6 Strategy.
- A revision of the Special Education Needs arrangements to facilitate timely access to necessary additional support for young people when learning or personal needs are identified to prevent the emergence of underachievement.
- A broader, criteria based physical infrastructure programme for education which includes, but goes beyond, the Lisanelly project on shared education and extends to a wider range of provision some of which may be curriculum based. This is a necessary requirement to promote the removal of spare capacity in education and give rationale to Area Based Planning. There is also a need to provide accommodation which can facilitate the expansion of the applied curriculum and related emerging skills needs. It is also a necessary response to creating employment in the construction industry and to giving visibility to the Investment Strategy.
- A policy on Community or Area Planning to include the community use of schools, more flexible school governance and moderated autonomy, the 'safe routes to school' commitment from the Department of Regional

Development, revised admissions and enrolment arrangements and the related transport policy.

- A policy on teacher education to encourage a research informed profession capable of providing 'new' areas of the curriculum, its related assessment and qualifications framework and delivering learning in a technologically developing world.
- A review of the teaching workforce to include a better male/female balance, age profile, professional development and revised terms and conditions of service.

## 5.0 Overview and Conclusions

- 5.1 The Council looked forward to the draft Programme for Government as the vehicle to initiate a structural re-alignment in policy and funding to radically change the society and economy of Northern Ireland. Regrettably it did not do so, although there are some encouraging signs in the Economic Strategy. The predominant trend in the key commitments is 'more of the same'. The concern is that there is not a sufficient evidence base to understand what has worked or not, and why this is so, to inform future actions. What is clear to this Council is that there remains a high level of social deprivation in our communities, the gap between the highest and lowest achievers is not perceptibly closing, the economy remains reactive and is excessively reliant on a reducing public purse and opportunities for our young people are diminishing. Structural change takes a long time. This PFG reflects a political vision which is focused only on the short term. The programme is heavy on the 'operational' and light on high level long-term strategic policy, particularly in relation to structural change and a coherent cross-departmental inclusive social policy. Unless the process of structural change is started it will never happen and the mistakes of the past will be repeated except that this time the consequences will be more serious as our global competitor's progress at an increasingly faster pace. The Council hopes that this consultation will lead to a re-consideration and a change of direction.
- 5.2 This is a critical time for Northern Ireland. The old ways will no longer work. Young people in schools today could be in work for the next fifty to sixty years. Schools are currently preparing young people for an economy which will have jobs that don't yet exist, using technologies that have not been invented, to solve problems that are not yet known about or to make things that can only be imagined. It is clear that to survive, never mind prosper; Northern Ireland will have to use its education system differently to make its economy different. It is only by shaping the future and responding to the drivers 'ahead of the pack' that this country can be competitive. Schools need to see the emerging skill needs and reflect these in a broad and balanced curriculum offer for all young people. The importance of young people and the education that they get will be fundamental to social and economic progress.

5.3 The Council would prefer to see long term strategies for structural change in social policy to emphasis the prevention of negative impacts rather than a continuation of the current policies of 'cure' and amelioration which are doomed to limited success. It proposes.

- Either:

i. A fleshing out of the Economic Strategy to influence the whole of the education sector, with a particular emphasis on the school curriculum to lay the foundations for the skills needed in a modern, competitive economy but also to create some short term outcomes to create opportunities for young people coming on to the labour market.

Or

ii. The development of an 'enabling' strategy to take a broader perspective on a range of foundation issues to underpin the principle strategy, which would have a heavy emphasis on education.

- A genuine cross-departmental Programme through which partnership on relevant areas would be required through the Public Service Agreements' to produce beneficial outcomes through more effective and efficient working.

5.4 Within Education, as it is currently structured, the Council would like to see;

- Coherent policies and strategies with other relevant departments to prevent under achievement by focussing on the causes through an integrated, whole of government policy of early or timely intervention, including early years intervention and the resources to provide for such needs. There should be an end to short-term 'projects' as there is more than enough evidence of value in provision such as 'nature groups'.
- A re-focussing of the curriculum as part of a connected Economic Strategy involving other relevant departments, intended to achieve high quality outcomes to include an investment in vocational and technical training to ensure a rapid response to changing skill needs.
- A reappraisal of policies to under-pin points one and two and to improve how education services are delivered and standards raised within reduced budgets.

- A cross-departmental communication strategy to explain the purpose of curricular policy change to employers and the wider public and to engender support.

5.5 The Council believes that its response to the draft Programme for Government is honest and constructive but challenging. It encourages Ministers, Assembly Members and the Civil Service to be bold and courageous in beginning to make the longer term structural change needed to give Northern Ireland a real opportunity to build on the peace process and to emerge stronger from the current economic down turn. In conclusion, the Council looks forward to contributing to a revised and final Programme for Government 2011-15.

## Council for the nature conservation and the countryside

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

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22 February 2012.

DRAFT PROGRAMME FOR GOVERNMENT 2011-2015

CNCC welcomes the opportunity to comment on the Draft Programme for Government. Our expertise lies in the natural environment, and so most of our comments centre on Priority 3: Protecting our People, the Environment and Creating safer Communities, but we also have some more general comments.

### Our Commitments

We find this section somewhat confused and confusing to the reader. Many of these commitments are high level strategic aspirations, such as 'deliver a range of measures to tackle poverty and social exclusion' or 'improve access to Justice', while others are extremely specific, such as 'host the World Police and Fire Games in 2013' or 'upgrade the Coleraine to Derry/Londonderry railway line'. The order in which these commitments are presented does not appear to have much logic, which makes it difficult to read. We would suggest that the commitments should be divided into discrete groups along the lines of the Priorities outlined in Section 4, and presented as fewer high level strategic aims in this part of the document, which can be expanded to show specific actions grouped under several headings in a later section. This would avoid repetition, and give a clearer picture of what the Assembly's key priorities are.

### Where we are

While this section gives some excellent examples of what has been achieved in the past few years it does not provide the context for the achievement, showing how the Assembly performed against the previous Programme for Government or against national and international commitments. We believe it is important to examine the failures as well as the successes, in order to learn from the causes of both. For a relatively young and inexperienced administration there will be important lessons about setting and delivery of policy and the strengths and weaknesses of our system of government. The Assembly needs to recognise how well (or how badly) it is delivering, and the public is entitled to some explanation as to why actions that had been promised were not delivered.

### Our Approach

We welcome the clear statement on page 23 of the three guiding principles for rebalancing and rebuilding our economy. In particular we are pleased to see the definition of sustainability which makes explicit the idea of intergenerational equity, though this might have been more accessible through the simple definition of the Brundtland Commission which states that “Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs”

Unfortunately the concept of sustainability as defined here does not reappear again in the rest of the document. Priority 1 talks of a 'Sustainable Economy' but it becomes clear from the detail of the section that this means either sustained economic growth, or a focus on producing the necessary structures and equipment for renewable energy production, which may be relevant to sustainable development, but is not necessarily so.

#### 4. Our priorities

##### Priority 1: Growing a Sustainable Economy and Investing in the Future

We are concerned about the Key Commitment at the top of Page 31, which states that planning applications 'with job creation potential are given additional weight'. This seems to us to be a reiteration of the proposed PPS24 which was rejected by the Minister for the Environment last year, following a great deal of adverse comment in the public consultation exercise. We believe that economic, social and environmental factors should be given equal weight (the Ecosystem Approach), and that there needs to be a better method of assessing economic data for accuracy – many applications are accompanied by ridiculously optimistic economic appraisals, often based on out-of-date assumptions. Without careful examination and analysis they should be treated as speculative.

Given that the planning function is due to be devolved to local government we would suggest that the key commitment should be to 'Transform the planning system into one that is accessible, transparent, accountable and just' as recommended by Friends of the Earth in their recent document *What are they Planning? - A Vision for a Better Planning System*.

We also note the final Key Commitment on Page 31, to 'Encourage industry to achieve 20% of electricity consumption from renewable electricity and 4% of renewable heat by 2015'. We welcome this commitment, but note that there is no comparable one for the Public Sector, nor any targets for energy conservation.

##### Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing

We are surprised to see the Rural White Paper included in the Building Blocks for this and Priorities 4 and 5. As far as we are aware this document does not exist, though a draft Action Plan for the Rural White Paper was issued for consultation in 2011. We suggest that this reference should be removed.

Recent research has shown that one of the most striking influences on health and well being is access to the natural environment, often but not necessarily associated with exercise. We are therefore surprised to see that there is no commitment to provide much greater public access to our countryside, which is currently poorer than any other country in Europe. While landowners have been resistant to this we



suggest that the overwhelming case for public benefit from such a move makes it an important priority. We also suggest the inclusion of the NI Outdoor Recreation Strategy in the Building Blocks.

### Priority 3 : Protecting our People, the Environment and Creating Safer Communities

We are somewhat puzzled that this opens with the statement that this 'focuses on making real improvements to people's health and wellbeing', which is the stated aim of Priority 2. While some overlap is inevitable, we suggest that this Priority should focus on the environment in which we live, and looking after what it does for us. The National Ecosystem Assessment, published last year provides essential background, demonstrating the importance of a wide range of ecosystem services provided by the environment, including clean air and water, flood control, safe and healthy food, flood control, nutrient cycling and other soil processes, pollination of crops, carbon storage and many more. Without a healthy environment providing these vital functions we will be in serious difficulties.

We therefore also suggest that those Commitments relating to justice, social care and protecting people should form a separate Priority.

We suggest that the Building Blocks section should include the following:

- National Ecosystem Assessment
- Wildlife and Natural Environment Act
- Marine Strategy Framework Directive
- Better Regulation White Paper
- Invasive Alien Species Strategy

The key commitments are extremely disappointing, with little reference to the natural environment, other than 'Protect and enhance our natural environment by working to halt the loss of biodiversity'. The failure of earlier work to halt the loss of biodiversity (the 2010 target was missed by a significant margin) suggests that this is not a realistic commitment. In addition, working to halt biodiversity loss is only one of a great many measures needed to protect and enhance our natural environment. If many of these measures were implemented the result might be to slow down biodiversity loss. We suggest that some sensible, urgently needed, and achievable commitments would be:

- Fully implement the EC Habitats and Birds Directive (NI currently faces infraction cases under both these Directives).
- Fully implement the Water Framework Directive.
- Enact and implement the Marine Bill. This will involve setting up 'an ecologically coherent network of Marine Protected Areas' by 2012.
- Implement the European Landscape Convention by (i) setting up one or more internationally recognised National Parks and (ii) revising the status of Areas of Outstanding Natural Beauty to give them Statutory Management Plans.
- Implement the Biodiversity Duty under the Wildlife and Natural Environment Act
- Set up an independent Environmental Protection Agency, or at the very least carry out the review of NIEA promised by then Environment Minister Arlene Foster in 2008.
- Work towards the completion of the designation of a full suite of ASSIs by 2016

- Develop Agri-environment Schemes that will start to deliver landscape-scale nature conservation.
- Incorporate the findings of the National Ecosystem Assessment into policy-making at all levels across the public sector.
- Publish and implement a new Biodiversity Strategy.
- Publish and implement an Invasive Species Strategy.
- Transfer responsibility for freshwater fishing to NIEA.
- Stop all netting of Atlantic Salmon at sea.

We welcome the commitment to work towards reductions in greenhouse gas emissions, but are disappointed in the blandness of the projected milestones/outputs. There needs to be a clear plan for how the reductions will be achieved, with the public sector showing a strong lead in energy conservation and commitment to renewable energy.

We also welcome the commitment to invest £500m to promote more sustainable modes of travel, but again the outputs lack any focus or detail. We suggest that the Coleraine to Derry rail upgrade is part of this, as is the development of the Belfast Rapid Transit network. We are also concerned that this commitment may conflict with an earlier commitment in Priority 1 to progress the upgrade of key road projects. The disparity between the sums available for each of these projects is large, and we suggest that more of the transport budget should go to more sustainable modes of travel in line with the underlying principles laid out in Section 3.

#### Priority 4 : Building a Strong and Shared Community

We are puzzled by the inclusion of the World Police and Fire Games and the significant international golf tournament as Key Commitments in this Priority. Their contribution to community building is not apparent. These are surely part of the commitment to increase visitor numbers and tourist revenue in Priority 1 and not key Commitments in their own right.

#### Conclusion

Given that this document has taken months to appear we are disappointed that it is not more carefully thought out and presented. It is difficult to see what the Assembly is really hoping to deliver and how it intends to do this, and this document should be making those things absolutely clear.



Patrick Casement (Chairman)

This is my response to the consultation on the Draft Programme for Government (PfG) 2011–2015.

I am concerned that the Draft PfG lacks an overall vision and is light on key commitments for the natural environment. I believe that the Assembly needs to show the spirit and vision that is needed to make Northern Ireland a leader in sustainability and an example of what local democracy can achieve.

There is an intense focus in the PfG upon growing the economy but this should not be at the expense of the natural environment. Indeed, a healthy environment directly contributes towards a healthy economy – sustainable tourism and creation of the jobs needed to deliver a low carbon economy, are just two examples.

Whilst there are some good things in the Draft PfG, such as a revised Biodiversity Strategy and an Invasive Species Strategy, the document fails to put in place measures to help deliver them. In addition, there a number of significant gaps in the document that must be filled. I ask that the following targets are included in the PfG:

- A Northern Ireland Climate Change Act, with tangible emissions reduction targets for each sector. Currently we are 99% reliant on increasingly expensive imported energy. If we move to a low-carbon economy with a thriving renewable energy sector our energy supply will be secure, and we will have created thousands of new jobs and attracted major investment. Committing to a Climate Change Act would help us deliver this low-carbon economy.
- The creation of an independent environmental protection agency. This would act as a champion for sustainability and environmental protection, and prevent costly indecision and slow action on safeguarding our environment which leaves Northern Ireland taxpayers repeatedly exposed to the risk of enormous fines for breach of EU environmental law.
- A Northern Ireland Marine Act which ensures a framework for healthy seas and protection for a range of marine species.
- A reformed planning system with sustainability at its heart. I want to see a planning system that can help deliver a thriving economy whilst protecting our natural, built and cultural heritage. All development must be truly sustainable and promote long-term societal benefits, and deliver improved health and wellbeing.
- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of halting biodiversity decline and they also provide a range of other benefits including helping support rural communities by providing financial support to farmers and creating significant socio-economic benefits.

Finally, I want the Assembly to ‘Step Up for Nature’ by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely, D Craig

## Crookshanks C

To whom it may concern

As Principal of Holywood Primary School, we aim to support all children in various forms of active learning during their time with us and in preparation for their secondary education.

In addition to our well established and wide of curricular and extra curricular programmes of PE and Health Education, we also involve the children in association with DOE Safety Training Programme and Cycling Proficiency. We have recently been part of the Bikelt Scheme affiliated to the UK charity Sustrans. Not only is it profiling the good practice already in school it is trying to raise the % of pupils who travel to or from school on bike/ scooters or by foot.

We would fully support the Executive [target for increasing the proportion of children who cycle and walk to school in its Draft Programme for Government \(PfG\)](#). i.e.

“ the importance of exercise and road safety to parents we would by 2015 create the conditions to facilitate at least 36% of primary school pupils and 22% of secondary school pupils to walk or cycle to school as their main mode of transport.”

The only issue we would have as a school is that safe storage of the bikes/ scooters on the school premises can be costly and we do not have funds to do this.

Please add these views to your consultation responses.

Many thanks.

## Cross F

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Finally, I want the Assembly to 'Step Up for Nature' by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely, F CROSS

## CTC

Consultation Programme for Government 2011-2015 - Below is response to PfG consultation prepared on behalf of the CTC.

CTC has 70,000 members and supporters. The CTCs interests cover not only the role of cycling in transport policy including road safety, highway planning design, influencing travel behaviour, and integration with public transport, but also how cycling fits in with other areas of policy: health, environment, education, traffic law and enforcement, taxation, land-use planning and development, regeneration, countryside access and tourism. The CTC welcomes the hope of a shared and better future for all.

The Regional Development Committee's Inquiry in to Sustainable Transport recommended robust carbon costing is built into business cases for projects and procurement. Major road schemes proposed in PfG do not appear to have been robustly carbon costed. Consequently investment in healthier none polluting sustainable modes are under funded impacting on emissions health social inclusion and well being. The SDC noted in Fairness in a Car Dependent Society the richest 10 per cent of the population effectively receive four times as much public spending on transport as the poorest 10 per cent. NI is a car dependent society.

The commitment to supporting walking and cycling modes in the journey to school is welcome but other recommendations made by the Regional Development Committee beneficial to sustainable transport modes are absent from the PfG.

The commitment to increasing the percentage of the Health budget spent on Public Health is welcome. However £7.8 million budget to tackle obesity is dwarfed by the spending on anti obesity drugs and other medical interventions. We note in PfG Delivery Report 2008 – 2011 the failure to halt the rise in obesity and the fall in physical activity. (Annex 3 PSA 8) Prevention is so much cheaper than cure and daily integrated physical activity is 100% dose responsive. The Assembly Health Committee in its Inquiry into Obesity noted the need to tackle the obesogenic environment..

The low numbers of road deaths in NI are welcome. However a disproportionate burden of KSI and carried by vulnerable road users. The PfG is silent on how healthy walking and cycling modes can increase without casualty rates rising. A proper measure of Road safety is not only a reduction in KSI rates but also a corresponding reduction in the perceived fear of traffic at a population level and increased walking and cycling across all age groups and genders.

The commitment to a speedier planning process is noted. Reducing the need to travel and other long term environmental and sustainable planning objectives should not be sacrificed in the rush of faster decision making

The commitment to greater equality of opportunity and economic participation is welcome. 50% of households in Belfast and 25% of all households in NI do not have access to a car or van. Job locations should become accessible not only by car but Public transport and other sustainable modes.



## Cunningham T

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- The creation of an independent environmental protection agency. This would act as a champion for sustainability and environmental protection, and prevent costly indecision and slow action on safeguarding our environment which leaves Northern Ireland taxpayers repeatedly exposed to the risk of enormous fines for breach of EU environmental law.

- A Northern Ireland Marine Act which ensures a framework for healthy seas and protection for a range of marine species.

- A reformed planning system with sustainability at its heart. I want to see a planning system that can help deliver a thriving economy whilst protecting our natural, built and cultural heritage. All development must be truly sustainable and promote long-term societal benefits, and deliver improved health and wellbeing.

- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of halting biodiversity decline and they also provide a range of other benefits including helping support rural communities by providing financial support to farmers and creating significant socio-economic benefits.

Finally, I want the Assembly to ‘Step Up for Nature’ by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely, T Cunningham

# The Commission for Victims and Survivors for Northern Ireland

## CVSNI RESPONSE TO THE NORTHERN IRELAND EXECUTIVE CONSULTATION PAPER ON THE PROGRAMME FOR GOVERNMENT 2012-15.

### Introduction

The Commission for Victims and Survivors for Northern Ireland (the Commission) was established in June 2008 under the *Victims and Survivors (Northern Ireland) Order 2006*, as amended by the *Commissioner for Victims and Survivors Act (2008)*.

The Commission is a Non-Departmental Public Body (NDPB) of the Office of the First Minister and deputy First Minister (OFMDFM). The principle aim of the Commission is to promote awareness of the interests of victims and survivors of the conflict. It has a number of statutory duties that include:

- Promoting an awareness of matters relating to the interests of victims and survivors and of the need to safeguard those interests;
- Keeping under review the adequacy and effectiveness of law and practice affecting the interests of victims and survivors;
- Keeping under review the adequacy and effectiveness of services provided for the victims and survivors by bodies or persons;
- Advising the Secretary of State, the Executive Committee of the Assembly and any Body or person providing services for victims and survivors on matters concerning the interests of victims and survivors;
- Ensuring that the views of victims and survivors are sought concerning the exercise of the Commission's functions; and
- Making arrangements for a forum for consultation and discussion with victims and survivors.<sup>128</sup>

The Commission is pleased to have the opportunity to provide a response to the Northern Ireland Executives consultation relating to the draft Programme for Government (PfG) 2012-15.

### General Comment

The Commission welcomes the publication of the draft Programme for Government. We recognise the challenges of agreeing a policy framework across the Executive and are pleased that a substantive draft has been issued for public consultation.

The Commission acknowledges that there are many aspects to the draft Programme for Government, and, in particular, we welcome its focus on equality and sustainability as underpinning principles for the Executive's plans. We welcome the recognition of the inequalities that exist and the commitment to ensuring that the Programme for Government makes a real difference to people's lives.

The Commission welcomes the strategic priorities set out in the programme and many of the individual proposals that it contains. However, it will be the delivery of the Programme for Government's priorities that will make a difference to people's lives in Northern Ireland, and we recognise that the detail on delivery and the work of

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<sup>128</sup> The functions of the Commission relate to those set out in the *Victims and Survivors (Northern Ireland) Order 2006* as amended by the *Commission for Victims and Survivors Act (Northern Ireland) 2008*.

individual Departments, both separately and collectively, will be the crucial determinant of success.

## Victims and Survivors

The main reference to Victims and Survivors within the draft Programme for Government appears under Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing. The Commission is of the view that this reference is not sufficient. It appears as a milestone/output and refers in the main to the new Victims and Survivors Service. The Commission is of the view that this reference is insufficient recognition of the significance and the complexity of needs that exists in relation to victims and survivors.

A total of 76 commitments are listed in the draft document and victims and survivors do not feature in any of them currently. The Commission would recommend that due regard is given to victims and survivors issues by including two distinct commitments namely:

- Further development of services that address the needs of Victims and Survivors and
- Further the aims of OFMDFM's strategy for Victims and Survivors by specifically addressing dealing with the past and building for the future.

The approach of the Commission for Victims and Survivors to the draft Programme for Government is to judge it against the executive's key policy framework, namely, OFMDFM's 10-year strategy for Victims and Survivors. It is worth noting that the three key themes of the 10-year strategy, which are already executive policy, are dealing with the past, developing services to meet assessed need and building for the future. The Commission does not see sufficient recognition of those three key themes in the current draft Programme for Government.

The Commission organised a specific consultation event on the draft Programme for Government document with the victims and survivors sector on 12<sup>th</sup> December 2011. The key message emerging from this consultation was that addressing the needs and issues of Victims and Survivors should be a priority for Government and a key commitment within the document. Numerous individuals stated that current references in the document were insufficient and a more comprehensive statement of the Government's commitments to addressing these issues is required. The clear message from the sector was that confining victims and survivors issues within one priority is not sufficient, as these issues are interconnected and need to be addressed and named in Priorities 3,4 and 5 of the document as well.

Therefore, in relation to the current reference to Victims and Survivors contained within Priority 2 the Commission is of the view that:

- The current reference to the Victims Service as a milestone/output is insufficient in addressing the complex needs of victims and survivors;
- It is not appropriate to address the needs of victims and survivors within a single key commitment entitled "Deliver a range of measures to tackle poverty and social exclusion";
- The needs of Victims and Survivors should be made a specific key commitment within the Programme for Government;
- Victims and Survivor's issues are much too important to be relegated to a milestone/output;

- The terminology of “Conflict Related Harm” is contentious and appears unnecessary in the document;
- The reference needs to be expanded from the current focus on the Victims Service to reflect the complexity of victims and survivors issues;
- The Commission for Victims and Survivors needs to be added to the list of building blocks named on page 45 of the document.

The issues and needs faced by victims and survivors are complex and multidisciplinary. Therefore, the Commission recommends that further references are included in the final Programme for Government within the other Priorities. For example, within Priority 3: Protecting Our People, the Environment and Creating Safer Communities, feedback from the consultation endorsed the Commission’s view that victim and survivor issues should form part of improving health and wellbeing and improving access to justice elements of this Priority.

Within Priority 4: Building a Strong and Shared Community, the Commission would point out that the Victims Strategy 2009-2019 is a glaring omission from the list of Building Blocks identified on page 47 and it should be added to this section. Victims and Survivors also have a significant role to play in the delivery of key commitments within this Priority and therefore should be reflected within the text in relation to the key commitments and milestones for:

Finalise the Cohesion, Sharing and Integration Strategy to build a united community and improve community relations and

Actively seek local agreement to reduce the number of “peace walls”.

The Commission are also of the opinion that the issue of dealing with the past is a glaring omission from the draft Programme for Government. The Commission recognises that this is a difficult matter. However, we believe that it needs to feature and it is an issue that needs to be addressed. Therefore, as a minimum, there needs to be a key commitment within Priority 4, for Government to further the aims of OFMDFM’s strategy for Victims and Survivors by specifically addressing dealing with the past and building for the future.

The Commission would recommend that the new Victims and Survivors Service is referred to within Priority 5: Delivering High Quality and Efficient Public Services as a key commitment to deliver high quality services to victims and survivors. The Commission would recommend that the text should be similar to the key commitment stated in relation to the Education and Skills Authority.

#### Other Observations

In relation to more general observations in the draft Programme for Government document, the Commission has observed that there is little evidence of a joined-up approach. Of the 76 commitments, 74 are assigned to an individual Department with little reference to cross-departmental working to deliver the key commitments, milestones and outputs. For example, the previous Programme for Government had a cross-departmental commitment to children and young people. However, it would seem that this draft Programme for Government has not included these types of initiatives. For our part we would suggest that consideration be given to the creation of a cross departmental mechanism to monitor and keep under review the delivery of a CSI strategy and we would advocate that dealing with the legacy of the past should be a matter of concern within the CSI strategy.

In addition, there is a lack of coherence in commitments. Some are very high level and others are extremely specific. Many important areas are left out entirely or are not carried through into commitments, for example, mental health or early intervention.

There is no evidence of a clear legislative programme. Scrutiny of the document reveals that eight pieces of legislation are mentioned over three years. However, other important pieces are not included, for example, the Welfare Reform Bill.

The milestones and outputs are variable. Some are specific and will be easy to measure. Others suggest a lack of clarity on what will be delivered and how they will be delivered. There is little information in regard to monitoring and evaluation mechanisms. The programme provides a high-level delivery framework and states that there will be effective monitoring and regular quarterly reporting regimes but there is little detail on what these will be.