



renewables

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Wednesday 22<sup>nd</sup> February 2012

**BY E-MAIL AND POST**

Dear Sirs/Madam,

**Re: TCI Renewables response to the Draft Programme for Government 2011-2015**

As an active participant in renewables development in N. Ireland we thank you for the opportunity to respond to the Draft Programme for Government 2011-2015.

TCI first established offices in Belfast in 1999 offering specialist infrastructure services to the communications and renewables generation sector, delivering Northern Ireland's first 'on-site' wind generating power station at Antrim Area Hospital in 2004 for the then United Hospital Trust, before establishing a dedicated renewables division in 2005 to develop renewable energy projects in the Northern Ireland and the wider UK marketplace; later expanding into the North American market.

Amidst developing on-site renewables power generation solutions for intensive energy users such as hospitals, councils and local industry, TCI Renewables Limited (TCIR) has developed a strong focus on delivering large scale wind farms with a portfolio of over 100MW of consented projects across N. Ireland alone and over 100MW of additional local projects in development, making us one of the most successful private developers and investors in the renewable energy sector in Northern Ireland.

TCIR thus welcomes the opportunity to respond to the Draft Programme for Government 2011 – 2015 (DPG). We particularly endorse the cornerstone principles of Sustainability within the document. As a renewable energy developer TCIR are committed to making a significant positive contribution towards the generation of sustainable energy in Northern Ireland and we would hope to be able to continue investing in the long term to realise and indeed maximise opportunities for present and future generations. However, this long term goal could be prevented by the myriad of on-going issues and obstacles which affect sustainable renewable energy development progress such as a lack of firm commitment to the upgrade grid infrastructure to accommodate renewables power generation including the new north-south interconnector, prolonged and protracted planning processes, financial market constraints (reduction in Renewables Obligations) and the electrical constraint and curtailment of wind power generation on the grid network.

TCIR also welcomes the recognition that sustainable development requires working together, across and beyond organisational and social boundaries. However, the DPG appears to lack an agreed overall vision and the deliverables as outlined in the document are not integrated and do not provide a mechanism for delivery across departments, agencies and sectors. The DPG should seek to integrate action across all of government, and this is of particular relevance to the energy sector, which currently engages with six different government departments.

Belfast  
Oxford  
Montréal

**TCIR would make the following comments on the 2 most prevalent "Priorities" as outlined in the DPG:**

**Priority 1 - Growing a Sustainable Economy and Investing in the Future**

The DPG commits the Northern Ireland Executive to encourage industry to achieve 20% of electricity consumption from renewable electricity and 4% renewable heat by 2015 (DETI).

TCIR are concerned that this target and any interim milestones are insufficient to allow Northern Ireland to reach its objectives for 40% of electricity consumption in Northern Ireland to come from renewable energy sources by 2020, as outlined in the Strategic Energy Framework (SEF). Crucially there is no indication given within the DPG on how or indeed when the significant urgent grid reinforcement, upgrading and extension of the grid network required for meeting the SEF 40% by 2020 target will be constructed.

The target outlined in the SEF is not '*subject to adequate grid reinforcement being approved by NIAUR*', which is alarmingly included in Priority 1 of the DPG. TCIR would urge that appropriate infrastructure planning and development must take place within the period of this government up to 2015 to ensure NI is ready and able to achieve and deliver the SEF 2020 targets, if not exceed them. Reducing dependence upon fossil fuel generation and producing clean renewable energy is a very real commitment to a sustainable economy and without appropriate grid infrastructure to support this, achieving these ambitious targets will prove impossible.

One of the crucial infrastructure components to achieving these renewable targets, improving the all island Single Energy Market and increasing the potential for energy export is the successful delivery of the North-South interconnector. TCIR are greatly concerned that this is not mentioned within the DPG for delivery. Within the SEF, DETI have committed to supporting the construction and commissioning of the new North-South interconnector by 2013-2014 which makes it's omission from the DPG all the more surprising.

Within the SEF it is clear that DETI is committed to creating the relevant conditions for an increase to 40% electricity consumption from renewable sources by 2020. To do so, DETI will consult and, if necessary, legislate on the Department's and the NIAUR's statutory duties so that sustainability is given a higher priority in relation to other duties. Given the short time-frame between 20% in 2015 and 40% in 2020, TCIR believes that it will be necessary to enshrine the commitments as contained within the SEF in legislation, including but not limited to the transposition and implementation of the requirements of the European Union Renewable Energy Directive for all relevant Government departments.

TCIR notes that Priority 1 includes a commitment to ensure that 90% of large scale investment planning decisions are made within 6 months and applications with job creation potential are given additional weight (DOE). This news is most welcome, however, the budget for Planning Service is scheduled to drop from £10.4 million in 2010-11 to £5million in 2014-15 and TCIR has concerns that the associated loss of experienced staff will impact significantly upon the ability of DOE to meet this target. TCIR would also suggest that one method for assisting in the delivery of these 6 month targets is to place statutory timelines for consultees to respond to planning consultations, as this is the area which often leads to delays in application determinations within the current system.

**Priority 5 - Delivering High Quality and Efficient Public Services**

The DPG will lead to the establishment of a new 11 council model for Local Government by 2015 (DOE). TCIR would express grave concern that planning applications for wind farms are proposed to be dealt with at Local Council level. At present, all wind farm applications are submitted into central planning services in Belfast through the strategic planning team and their dedicated wind farm case officers. This team have a wealth of knowledge and many years of experience in dealing with these often complex, specialist applications, and as such TCIR feel it is essential that all wind farm applications should continue to be processed in this way. It seems like an unnecessary backward step to remove wind farm applications from the proven specialist planning team and place them with lesser experienced case officers at local council, particularly given the binding target of 40% renewable consumption required by 2020 within the SEF.

TCIR would make the following comments on the 3 remaining specific priorities as outlined in the DPG:

**Priority 2 – Creating Opportunities, Tackling Disadvantage and Improving Health and Well-being**

The DPG aims to introduce and support a range of initiatives to reduce fuel poverty across Northern Ireland including preventative interventions (DSD) and this is welcomed. By committing to the SEF target of 40% renewable consumption by 2020 Northern Ireland is setting out its stall to reduce its extremely high dependence upon imported fossil fuels and the price fluctuations associated with same. Renewable generation is a cost effective long-term solution to fuel poverty reduction but as stated previously it will take significant infrastructure investment and firm commitments from the Government to achieve this.

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

The DPG contains the commitment to continue to work towards a reduction in greenhouse gas emissions by at least 35% on 1990 levels by 2025 (DOE). This is welcomed by TCIR and it will be important to monitor progress on this throughout the period of Government to ensure that emission levels continue to reduce so that the 2025 target can be met and aspirationally exceeded.

The Programme commits to 'Protect and enhance our natural environment by working to halt the loss of biodiversity (DOE)' and this is welcomed, however the commitment to designate 15 ASSI sites in 2014 and 15 in 2015 appears like an arbitrary number. TCIR would wish to ensure that any areas proposed for designation are actually required for protection rather than to meet with the reported figures.

**Priority 4 – Building a Strong and Shared Community**

TCIR welcome the themes presented within this Priority in the DPG but have no specific comments to make.

TCIR would thank you for the opportunity to comment on the draft Programme for Government 2011-2015. As a committed renewable energy developer in Northern Ireland TCIR see this session of Government as imperative to shaping the sustainable economy and in particular the delivery of the SEF target of 40% electricity consumption from renewable sources by 2020.

I trust that you will consider the contents of this letter in the publication of the finalised documentation.

Yours sincerely,



**Peter Craig**  
Projects Director  
for and on behalf of TCI Renewables Limited

# Testimonies and Social Witness Committee – Religious Society of Friends (Quakers)

18<sup>th</sup> Feb 2012

The Policy Secretariat  
Office of the First and Deputy First Ministers.  
Room E3.19  
Block E, Castle Buildings  
Stormont Estate  
Belfast BT4 3SR.



Dear Friends,

I write on behalf of the Religious Society of Friends (Quakers) in Ulster who have been pleased, through the involvement of their 'Testimonies and Social Witness Committee, to submit the attached comments on the recently produced document entitled ' Draft Programme for Government'.

We, as a part of the Christian Church, believe that we have a responsibility to be concerned with the quality of life in all sections of our community and therefore appreciate the opportunity to comment accordingly.

Our belief is that all people are precious in God's sight and that this is God's world which has been commended to our care.

There is an increasing disregard for integrity in society and we believe that truth and honesty are key standards for all but perhaps specially for those in public life.

Compassion for those who have experienced trauma and major difficulties in their lives is necessary and sadly we live in a world where the rich are becoming richer and the poor..... poorer.

Perhaps this is an opportune time as we discuss plans for the future of our Province to make huge efforts to commence a reversal of this trend.

We thank you for all your efforts in preparing this document and for giving us the opportunity to be involved and to comment accordingly.

Your Friend  
Sincerely

A handwritten signature in black ink that reads 'Rosemary Calvert'. To the left of the signature is a small, stylized initial 'RC'.

Rosemary A Calvert.  
Clerk, Testimonies and Social Witness Committee, Religious Society of Friends

<b>PROGRAMME FOR GOVERNMENT – 2011-15 – CONSULTATION REPLY PROFORMA</b>	
<b>Name:</b>	<b>Religious Society of Friends (Quakers) -Testimonies and Social Witness Committee</b>
<b>Organisation:</b>	<b>The Religious Society of Friends (Quakers) in Ulster</b>
<b>Contact Details:</b>	<b>Rosemary A Calvert. Clerk, Testimonies and Social Witness Committee, Religious Society of Friends.</b>

**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****Need to balance needs of the whole work force**

There is a difficulty in balancing the needs of employers and the needs of the workers (and potential workers). Full time, part time and temporary work all have a role in meeting needs for both groups.

Our concern is that all the citizens of NI feel valued and that their talents are not wasted and young school leavers feel that there is a future of work awaiting them that makes studying a worthwhile experience.

**Less skilled employment opportunities**

We are concerned that the balance of work towards higher skilled jobs may leave a large gap in the work demanding lower skill levels. The decrease in supermarket jobs through the introduction of self service tills, in hotel reception areas through the provision of automated check in facilities and the already established automatic bank tills etc leaves us fearing a future with fewer opportunities for those with lower skill levels. Not everyone can have high skill levels yet all need to play a part in society. The provision of these automatic services is leading to concern that marginalised groups begin to have less human contact. We understand employers needs to continually reduce costs etc but government has responsibilities to all citizens.

## 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

### **18 -25 year olds and work**

As a priority we hope the Executive will address the disconnect between the unemployed and work to be done. We feel that there are insufficient plans to address 20% level of unemployment predicted for this age group and fear a lost generation of young potential workers and the attendant growth in anti- social behaviour. £40 million seems a small sum to address such a critical issue.

### **Unemployment issues**

The UK government benefit reforms are likely to see the unemployment rate go up as people are moved from incapacity/sickness benefit to jobseekers as more may be classed fit for work which will have advantages and disadvantages. Are there plans to address this issue?

### **Shared future**

Many of our decisions that will ultimately bring our separate communities need to be generated by those communities – **bottom up not top down**. We point to the commitment to the removal of the Peace walls and caution against pushing its implementation in advance of the wishes of the communities affected.

### **Shared education**

We are aware of and uphold the work already undertaken to encourage shared education and hope that recognition will be given to experience within the integrated sector in making plans and developing this area. (NICIE)

**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

The Green New Deal is a cross sectorial initiative led by:

CBI, ICTU, Institute of Directors, NICVA, Ulster Farmers Union, Bryson Group, Energy Saving Trust, Friends of the Earth, NI Housing Executive NORTHERN IRELAND GREEN NEW DEAL GROUP.

WE are disappointed that the Green New Deal is absent from draft Programme for Government despite cross party support: and commitment by the executive.....*The Green New Deal is an ambitious investment programme which will leverage in significant amounts of private sector funding to deliver energy efficiency measures, and create several thousand jobs over a three year period. This scheme aims to reduce waste, cut bills for participating households, sustain employment through the recession and modernise our housing stock. In light of this the Executive has agreed in principle to engage and resources have been set aside accordingly. NI Budget 2011-15*

While we applaud the commitment to investment in sustainable transport, we note with concern that the emission targets as stated are so much lower than other regions throughout the UK.

Our response is determined by our agreed position that all waste – energy, human endeavour, natural resources, etc – is to be avoided where possible. As a result we would encourage these priorities.

There is **no target for the reduction in the impact on the environment of waste.**

**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

### **Migrant Population**

We were unable to see any specific proposals to support the migrant population in Northern Ireland – in some areas 1 in 4 people are migrants. Lack of English language is a problem for adults and children and prevents integration to society.

Many of the proposals relate to alleviating poverty and social exclusion but are not specific. Without an effective strategy for the whole of Northern Ireland, it will also be difficult to achieve a regional balance within it.

### **Reduction in crime**

We are particularly interested in proposals relating to reducing crime and in particular the reduction of re-offending. We believe that the use of Restorative Justice Practices can play a significant role both in the reduction of re-offending and in ensuring that more vulnerable members of the community feel safer. We are therefore disappointed that there is no reference to restorative justice either in the commitment relating to reducing the level of serious crime nor in the commitment relating to tackling crime against older and vulnerable people.

### **Prison reform**

Short spells in prison, especially for young people, tend to harden their negative attitudes to society. We wish to see more emphasis on less custodial sentences – these appear to have a more positive impact on offenders in relation to re-offending and are less expensive and could create more jobs in the community in supervision work of offenders.

Within prison, more practical emphasis on helping prisoners become responsible members of society once they are released.

### **Children**

Child poverty actions plans have been highlighted but plans are only mentioned to reduce and not eliminate child poverty – why set such low targets? – these are the citizens of our future Northern Ireland.

In relation to the above decades of research have shown that investment in 0 to 5 age range pays dividends in helping developing babies and toddlers become positively involved with parents, teachers and ultimately with the community – especially important in areas of social disadvantage. Evidence shows cycle of violence starts in the home (and environment) before the age of 3. (WAVE report – ‘Tackling the Roots of violence’)

We hoped to see more commitment to Sure Start programmes by supporting parents to interact with their children positively, there is a hope that the use of aggressive behaviour to deal with discipline etc will not be required and that another way will be learnt.

### **Mental Health**

Mental health issues are major concerns amongst the young male (often unemployed), offenders and within the prison population and among the isolated elderly – all marginalised groups within our society. We would wish to see a higher profile given to the proposals within the Bamford Mental Health Review.

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**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**

Overall we applaud our politicians for working together to reach the point by which they were able to reach agreement on a wide range of issues. However in general we feel that the Programme lacks ambition and in a number of areas and we hope that as political confidence grows, so will our ambition for the growth of our community.

We would encourage integrity in all decisions and activities and that the base of all decisions is to the welfare of our people above political aspiration.



# Alliance Party: Consultation Response

## Draft Programme for Government

### Alliance

#### General Comments;

The Alliance Party welcomes this opportunity to respond to the Northern Ireland Executive Draft Programme for Government (PfG) 2011-2015.

We welcome the five cross cutting priorities and believe that they are well set out to encourage a joined up, cross-departmental approach to policy and delivery. The inclusion of key commitments, milestones and outputs is encouraging and offers a disciplined framework through which targets will be delivered.

We do have some reservations around the monitoring and implementation of these targets, particularly as the majority of commitments are assigned to only one Department, despite the fact there are many which are cross cutting in nature. Departments may ignore their pivotal role in the delivery of some targets as they are not specifically associated with them in the PfG. We believe it would be better to include all Departments who have responsibility for particular commitments as this would encourage collaboration between Departments which is vital if progress is to be made on each of these issues. It may also be useful to include those government bodies and key stakeholders whose input will be essential.

The inclusion of the Programme Arrangements and Framework Delivery is a positive step as it shows the structures which will be used for the monitoring and delivery of the PfG although the detail included in it is scant. We note that the PfG Programme Board is exclusively made up of members of DUP and Sinn Fein, just two of the five parties whose Ministers are responsible for the implementation of the PfG commitments. It would be useful to have details of how Ministers from DUP and Sinn Fein will monitor the work of Ministers of other parties delivery on targets.

The commitment on page 12 of the document to collaboration (“we are conscious of the importance of collaboration; and within the Programme, as well as working more effectively across Government Departments”) is very welcome. However this is not fully reflected throughout the remainder of the document, in fact this is the only overt mention of collaboration throughout the PfG, and as a result there is a risk this emphasis could become mere rhetoric. We believe it would be beneficial to include better examples of collaboration and place more emphasis on the importance collaboration throughout the document.

The Alliance Party would like to see a duty placed on Government Departments to cooperate and collaborate on some general issues; we will discuss this further in our legislative proposals. Examples of areas where greater collaboration could be encouraged in the PfG include; promoting community safety and combating crime, promoting public health, working for sustainable development, and promoting a shared future.

There is a need in the PfG to commit further to early intervention. A shift in the balance of resources into programmes that seek to prevent problems from emerging or to seek to intervene at an early stage can

produce savings through avoiding the need to spend greater levels of resources after problems fully develop.

However, in general the funding of the former tends to be optional while the funding of the latter tends to be statutory. We believe throughout the PfG there is a necessity to commit to further measures in relation to early intervention.

Specific examples around the savings that can be made through investment in early intervention include:

- The cost of a child in care of the state costs approximately £100,000 per annum: funding provided to family support programmes such as Home Start and Sure Start cost less than £2,000 per intervention.
- Investment in interventions to reduce the number of young people not in education employment or training can save on average £81,000 over the lifetime of a young person. Investment in interventions such as the Prince's Trust Team programme can progress 80% of young people into employment, education or training.

Early intervention and prevention are central to tackling poverty and social exclusion across all groups in society. We welcome the commitment within the PfG to tackle social exclusion but feel that, as is the case throughout the document, there is a need to make explicit commitments to investments in early intervention.

We welcome the diverse range of commitments listed under the five pillars. However we would note that it would be helpful to have a legislative programme to accompany these commitments. This may be particularly useful given the small amount of legislation that has come to the Assembly to date this mandate.

The Assembly is first and foremost a legislative Assembly. So whilst the wide ranging commitments to tackling a number of issues affecting our society are welcome, without legislation to reinforce these, or to tackle other issues we are not using the Assembly to its greatest potential.

We will discuss our legislative proposals in greater detail later in this document.

We believe that it is also necessary to rationalise the headline commitments included in the PfG.

We are disappointed that the draft PfG contains no commitments to the implementation of the Green New Deal. The Green New Deal has now been launched for consultation in England, Scotland and Wales. Northern Ireland is at risk of being left behind.

Investment of £12million [as allocated in the Budget] in the Green New Deal has the potential to secure a total investment of over £80 million in domestic energy retrofit. This retrofit would help lift many families out of fuel poverty by saving 50,000 households an average of £350 on their energy bills, and by implementing measures that would prevent fuel poverty. Investment would also help to sustain 1,100 jobs within the construction industry and cut carbon dioxide emissions by 2 tonnes per household per annum.

From this it is clear that a commitment to the implementation of the Green New Deal would lead to progress on a number of other PfG commitments.

## **Specific Comments around Commitments;**

### Priority One, Growing a sustainable economy and investing in the future:

"Develop Maze/Long Kesh as a regeneration site of regional significance (OFMDFM)"

In relation to the development of the Maze/Long Kesh site we note the intention to hold the Balmoral Show at the site in 2013/14 – is this a realistic opportunity when we consider that this is the same year that the commencement of site infrastructure work is listed to begin?

"Increase visitor numbers to 3.6 million and tourist revenue to £625 million by 2013 (DETI)"

Commitments to increasing our total visitor numbers and revenue are welcome, however the first target should include reference to the need to complete and publish the Tourism Strategy as this will represent a key strategic document to help achieve the further targets outlined.

We recognize that the Tourism Strategy is referenced as a building block for priority one but is important to note at this stage it has not yet been finalized or published.

### Priority Two, Creating opportunities, tackling disadvantage and improving health and wellbeing:

"Implement an Integrated and Affordable Childcare Strategy (OFMDFM)"

We welcome the commitment to implement the Childcare Strategy, which is long overdue.

However, an economic appraisal carried out by RSM McClure Waters indicated that to put in place the essential actions required would cost £15 million, the commitment currently contained in the PfG is for £3 million. As such we have concerns as to how this shortfall will be addressed or that some essential outcomes will be omitted.

"Use the Social Protection Fund to help individuals and families facing hardship due to the current economic downturn (OFMDFM)"

The use of the Social Protection Fund to help individuals and families who are facing hardship due to the current economic downturn is welcome: however we particularly welcome the realisation that longer term programmes must be implemented alongside the fund in order to tackle the problem in the long term.

The first target under this priority, for 2012/13, makes reference to the completion of the Child Poverty Action Plan. We lack a specific target for Northern Ireland to fulfil our commitments under the Child Poverty Act. OFMDFM has a statutory obligation to report on progress made to tackle child poverty by March 2012; it is difficult to see what progress will be made by then if the Action Plan is not due for completion until 2012/13.

"Deliver 8,000 social and affordable homes (DSD)"

This commitment to delivering new social and affordable homes is obviously very welcome particularly given the size of the current waiting list. However it is disappointing that throughout the PfG there is no commitment to the provision of shared housing and we believe that this could be facilitated within this commitment.

The development of mixed and integrated housing is key to “building a strong and shared community” in Northern Ireland and as such it is disappointing that there is no commitment to this under this priority. We believe the development and promotion of shared housing should become an explicit objective of the Northern Ireland Housing Executive and would advocate for the introduction of legislation, such as a

Shared Housing Bill, to place a duty on the NIHE to encourage and facilitate the creation of mixed housing, as we will outline in our legislative proposals.

"Introduce and support a range of initiatives aimed at reducing fuel poverty across Northern Ireland including preventative interventions (DSD)"

Commitment to the reduction of fuel poverty in Northern Ireland is particularly welcome, especially the focus on preventative interventions such as the commitment to double glazing and to improve the thermal efficiency of NIHE housing stock. It may be useful to include a commitment to the Department developing an action plan, alongside involved Departments, stakeholders and officials to identify a range of initiatives that could be developed and implemented to tackle this issue in a holistic, collaborative fashion.

As mentioned previously we would also like to see a commitment within the PfG to the implementation of the Green New Deal. The retrofitting of housing stock would provide the opportunity to improve the energy efficiency of housing stock, alleviate fuel poverty whilst creating/sustaining much needed jobs within the construction sector.

"Ensure no additional water charges during this Programme for Government (DRD)"

We understand the populism in a PfG commitment to not introduce water charges within this mandate of the Assembly. The Alliance Party would once again raise that the contribution currently paid through rates does not cover the full cost of providing a water service and people subsequently pay through the underfunding of other essential public services.

We believe that the introduction of fair water charges is consistent with a progressive approach to revenue-raising and a concern for the most vulnerable in society.

"Ensure that at least one year of pre-school education is available to every family that wants it (DE)"

We welcome the commitment to pre-school education. However, there is very little detail in terms of how this will be realised and it should be included that this will be a pre-school place within a reasonable or manageable distance of the family home, otherwise this will make very little difference to the majority of families.

It is disappointing under this Priority that there is no reference to any older persons' issues such as tackling poverty and social exclusion.

We would welcome a commitment to increasing the current level of mental health spends. In Northern Ireland mental health services are underfunded in comparison to services for physical illness and considerably underfunded when compared to the spend on UK mental health services.

Emphasis on mental health as central to the public health programme would facilitate people to adopt healthy lifestyles and reduce health-risk behaviours. This shift would allow prevention of physical illness and promote mental health and wellbeing across the life span.

### Priority Three, Protecting our people, the environment and creating safer communities;

"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 (DRD)"

The Commitment to creating conditions to facilitate more school children walking to school as their main mode of transport is welcome – however DRD is listed as the only Department to see this through, when there is clearly work to be done with DE in order to achieve this commitment.



With this commitment also comes the need to ensure road safety for our cyclists and pedestrians; this should be included in this commitment, or there should be a separate commitment to set out detailed targets to achieve this aim.

"Reduce the environmental impacts from the waste we generate (DOE)"

There is a clear need to reduce the environmental impact of waste. However, all of the targets relate solely to domestic waste: this should be widened to include other sources of waste such as commercial and agricultural. Attempting to only deal with one source of waste through targets is restrictive and will only restrict the potential impact we could have on waste generation through targets to address all types of waste.

We agree with the assertion that culture, arts and leisure have the potential to be instruments for positive change. However this is confused by the 'shared out' listing of two separate language strategies (for Ulster Scots and Irish) as building blocks. The Alliance Party's preference would be for a Comprehensive Language Strategy, supported by legislation, as laid out in our proposals for a legislative programme.

Whilst the number of serious accidents on our roads continues to fall the PfG recognizes that there is more work to be done to further reduce the number of people who are killed or seriously injured on our roads. It is disappointing then that there is no commitment, with targets and commitments attached to address this challenge.

We are disappointed that there is no commitment within this or any other priority to Departments working together to address a range of transport problems. Our transport resources are currently not used to their full potential. For example it costs approximately £150 per day for a community mini-bus to sit idle and with the vast majority of the Education and Library Board 'Yellow' buses idle at weekends, this is a poor use of investment and of public money. By 'sweating the resources' we can work more cleverly to create solutions without having to invest in the purchase of new vehicles.

We would like to see a commitment to DRD, DHSSPS and DE working together to conduct a cross-departmental review of transport expenditure to identify the potential to share resources. Innovative solutions will save all three Departments money and create better access to transport for all.

It is disappointing that under this priority there is no mention of the need to protect our built and natural heritage. Milestones and commitments to this end should be included, not least because of the impact this will have on regeneration, tourism and the environment. These targets/commitments/milestones could be built into the commitment to "preserving and improving the built and natural environment."

There should also be a commitment to the bringing forward of a cross-departmental strategy on centenaries, accompanied with key targets and actions. With so many centenaries in the coming decade, we run serious risk of missing out the tourism potential these bring. A strategy would also ensure that these centenaries are marked in a way that is consistent with the creation of a share future rather than a in a separate and piecemeal fashion.

#### Priority Four. Building a strong and shared community:

We note the inclusion of the Sexual Orientation Action Plan as a building block under this Priority. However it is disappointing that there is no further reference to this throughout any of the commitments and we believe that an Action Plan falls short of a Sexual Orientation Strategy, which alongside an updated Race Strategy (reference to which is also disappointingly lacking) are key to tackling forms of prejudice in our society. There are on-going issues in relation to homophobia, access to services and hate crime which need to be tackled and the Sexual Orientation Strategy would be a key way of addressing these.

There are few mentions of integrated education throughout the PfG, and no targets as to how many children should be educated in integrated schools in the years ahead. We believe that integrated and shared education has a key role to play in the “building of a strong and shared community”, and as such it is disappointing that its further development and promotion is not referred to under this priority.

In order to build a truly strong and shared community it is essential that we adequately deal with our past. It is not advisable or sustainable to simply draw a line under the past, instead we must deal with it in a way which promotes reconciliation and is consistent with the creation of a shared future. We would like to see a commitment under this priority to an overarching, all party, process to deal with the past.

It is disappointing that there are no targets set to increase participation in grassroots sports, or physical recreation, when participation rates in Northern Ireland are amongst the lowest in the UK and especially given the number of sporting events which will take place during the lifetime of this PfG.

Participation in sport and leisure activities plays a key role in promoting health and wellbeing, including both physical and mental health and promoting cohesion between communities. Targets could be included around increased participation in physical education in schools, auditing and developing of facilities. There should also be targeting of sections of the community that are particularly low in participation. Steps such as these are consistent with early intervention and prevention and have the potential to save money in other budgets, such as health by tackling issues such as obesity and social exclusion.

#### Priority Five, Delivery high quality and efficient public services

The focus under this priority on the Review of Public Administration is incredibly scant on detail. The focus is solely on the reduction in the number of councils with no commitments to the development of a robust partnership model between regional and local government.

#### **Legislative Programme**

As we have previously mentioned, the Alliance Party believes it would be useful to include a legislative programme within the PfG.

There are a number of areas in which Northern Ireland law is now falling behind other regions or is no longer fit for purpose. Opportunities have also been missed to legislate for issues that are specific to Northern Ireland. A legislative programme included within the PfG would highlight and provide some clarity those areas that will be addressed within the coming four years.

The Alliance Party would call for the following legislation to be included in any legislative programme which would accompany the PfG;

#### **Enabling Bill for Corporation Tax**

This Bill would be an opportunity to pass any necessary legislation to take advantage of the opportunity that would arise if the UK Parliament devolves the power to vary the level of Corporation Tax in Northern Ireland to the Assembly.

#### **Faster, Fairer Justice Bill**

This Bill would provide a fairer, faster and more efficient justice system. The Bill would include measures arising from the Review of Access to justice; changes to courts proceedings to streamline procedures and offer greater support to victims and witnesses; placing the Victims Code of Practice on a statutory footing; and changes to fine enforcement to reduce levels of default.

## **Justice Miscellaneous Provision Bill**

This Bill will build on the wide-ranging measures which are contained in the Justice Bill. The legislation will include measures to take forward current reforms, the outcomes of the review of the youth justice system and community sentences and provide a statutory footing for the Prisoner Ombudsman.

## **Criminal Justice Bill**

This Bill would develop a new, human-rights compliant, framework for the lawful retention of DNA and fingerprint data by criminal justice agencies. It would also provide new measures to improve the management of convicted sex offenders.

## **Governance Bill**

This Bill would take forward necessary changes, such as removing the silo mentality, by placing a duty on all Departments to co-operate and collaborate to meet general objectives.

## **NI Water Governance Bill**

This Bill would provide for the transformation of Northern Ireland Water into a mutual company.

## **A Bill to Create an Independent Environment Protection Agency**

Environmental governance and regulation in Northern Ireland is not fit for purpose. The creation of an integrated and independent Environmental Protection Agency would result in a more efficient and effective system. It is estimated that the cost of establishing an EPA in Northern Ireland and associated re-organisation would be offset by efficiency gains within five years. In addition, it would limit the risk of large infraction fines from the European Union over inadequate environmental management and protection.

## **Winter Gritting Bill**

This Bill would address the current gaps in legislation which does not provide a clear duty on either the Department of Regional Development or District Councils with respect to the gritting of footpaths. This bill would also clarify the laws in relation to the liability faced by the public in clearing or gritting footpaths or roads.

## **Early Education and Care Bill**

Such an Act would clearly outline the responsibility of the Executive to provide appropriate care and education services for young children, including childcare provision and the appointment of a lead department.

## **Shared and Integrated Education Bill**

This Bill would provide a clear framework and system of support for the development of shared and integrated education. The Bill would ensure that the educational, economic and social benefits of integrated education are realised and mainstreamed. The Bill would include a commitment that the Department should work with the local community when a new school is planned; a reform of the criteria required for the creation and maintenance of an integrated school that recognises the range of identities in Northern Ireland including those children of mixed, other or no religious background; the on-going promotion of shared learning schemes; and area based planning focused on community and educational need rather than on a sectoral basis.

## **Shared Housing Bill**

This Bill would create a duty on the Northern Ireland Housing Executive to encourage and facilitate the creation of mixed housing, mirroring the existing duty on the Department of Education with respect to integrated education, and parallel its review.

### **Comprehensive Languages Bill**

This Bill would put into effect the legislative aspects of a comprehensive languages strategy for Northern Ireland. A comprehensive language strategy would cover both indigenous languages and other spoken languages used within Northern Ireland, as well as the various sign languages. Legislative aspects could extend to creating a duty on public bodies to develop language schemes that meet the identified needs of their user base rather than a 'rights-based' approach.

### **Shared Future Policy Proofing**

Complementing the Governance Reform Bill and to support a strategic focus on creating shared future and removing the financial burden of duplication within the system a new form of policy proofing in relation to sharing over separation could be introduced. This would be broader than the existing good relations duty that falls on all Departments and agencies.

### **National Park Bill**

This Bill would provide for the creation and designation of National Park status in Northern Ireland. The legislation would further protect and enhance the landscape quality, bio-diversity and culture of an area, provide an internationally recognised tourism brand and empower local communities.

### **Renewable Energy Support Bill**

The Bill could include the following: the introduction of feed in tariffs and renewable heat incentives; provision for permitted development for both domestic and certain non-domestic renewable installations; the creation of the framework for the introduction of smart metering; and the introduction of a development framework for geothermal energy.

### **NI Climate Change Bill**

This legislation would commit Northern Ireland to making a fair and proportionate contribution to the UK Greenhouse Gas Emission Reduction Targets required under the UK Climate Change Act. It would make addressing climate change a core national priority and an objective for all Ministers to take account of. Targets currently in place in Northern Ireland and the legal framework are insufficient to effectively deliver upon these commitments. Without legislation the opportunities to protect households and businesses and to reap economic and employment benefits will be limited.

### **Single Equality Bill**

This Bill would harmonise existing equality and anti-discrimination measures and update and strengthen equality provisions in Northern Ireland. It would address a number of urgent areas including amendment of race equality legislation to cover colour and nationality alongside race and ethnic origin; the extension of age-discrimination laws to non-employment areas; stronger duties on public bodies in relation to gender equality legislation; and addressing inconsistencies in disability equality legislation. This Bill would also revise Fair Employment monitoring to better reflect the diversity of mixed and multiple identities within Northern Ireland. The introduction of the Equality Act (2010) in Great Britain means that in certain areas our legislation lags behind best practice.

### **Adoption Bill**

This Bill would provide a long overdue update of Adoption Law in Northern Ireland. The law in Northern Ireland has now fallen behind the rest of the UK and potentially out of step with various pieces of recent domestic equality legislation and European Conventions. This updated bill would ensure uniformity

across statutory agencies; set clear standards in terms of quality; put in place eligibility criteria that reflects the norms of modern society; place the child at the centre of the process; recognise the needs of those involved in adoption; and establish a full range of options for permanent families.

### **Apartment Developments' Management Reform Bill**

This bill would address current inadequacies in the laws governing aspects of the ownership of certain types of private properties which comprise part of multi-unit developments (including privately owned apartments and so-called 'Townhouses'). This bill would clarify ownership and management issues for residents and owners.

### **Minimum Pricing of Alcohol**

This Bill would establish a minimum price per unit of alcohol.

### **Single Mental Health and Mental Capacity Bill**

This Bill would implement a key aspect of the Bamford Review on Mental Health and Learning Disability, and would result in mental capacity powers and protections that apply to everyone, including those with respect to the Criminal Justice System.

### **Education and Skills Authority Bill**

This bill would establish the Education Skills Authority (ESA) to replace the Education and Library Boards and other bodies such as the Council for the Curriculum, Examinations and Assessment; the Staff Commission for the Education and Library Boards; and the Youth Council for Northern Ireland. ESA would provide the functions and services currently delivered by the Council for Catholic Maintained Schools, the Northern Ireland Council for Integrated Education and Comhairlena Gaelscolaíochta, plus some functions currently carried out by the Department of Education. This body will save money through economies of scale (an estimated £21million in its first two years of operation) as well as ensuring standardisation of school support across Northern Ireland.

### **Northern Ireland Marine Bill**

Northern Ireland is covered by certain provisions of the UK-wide Marine and Coastal Access Act 2009. This Act governs matters beyond Northern Ireland's immediate territorial waters (i.e. beyond 12 nautical miles). In addition responsibility for our marine environment is spread across a large number of government departments. As a consequence many of our most diverse marine sites such as Rathlin Island, Belfast Lough and Strangford Lough continue to be damaged; the State of the Sea Report 2011 clearly defines the issue. Failure to legislate and maintain best practice with other regions could result in further damage to the environment and missed opportunities for the development of renewable energy in the absence of clarity on the regulatory framework. The Bill may include the establishment of a NI Marine Management Organisation and a more expedient and coherent approach to the development of marine plans and marine protected areas.

# The Confederation of Community Groups

## Draft Programme for Government 2011-2015

### Response by The Confederation of Community Groups

#### 1. Introduction

The Confederation of Community Groups (Newry & District) welcomes the opportunity to submit a response to the Draft Programme for Government 2011-2015 (draft PfG).

Established in 1973 the Confederation of Community Groups (CCG) is an umbrella organisation for Community & Voluntary Groups in the Newry & Mourne Area providing support and encouragement for the development of voluntary action by communities and individuals. This, in turn,

contributes to the development of an active community that influences positive change. Our objectives are to relieve poverty, sickness and the aged and to promote the benefits of the inhabitants of the area without distinction and to advance education, provide services and facilities in the interest of social welfare to improve conditions of life.

#### **General comments:**

In general CCG agree with many of the commitments contained in the draft PfG. However we feel that the process would have been better served if all departmental delivery plans relating to these commitments had been published at the same time. This would, we feel, have made the consultation process more robust.

We are concerned that there is little evidence of cross departmental working and that there is a distinct lack of understanding of a Community Development strategy. There seems to be no real commitment to addressing the risk averse nature of govt departments nor the reduction of bureaucracy (especially in the Com / Vol sector). The lack of detail in relation to Funding of the Com/Vol sector is concerning when compared to the detailed commitments such as those relating to "DETI" (economic review, strategy and budgets made available).

There seems also to have been little attention paid to mental health issues and no recognition of Newry as a strategic area for investment and growth based on the Belfast-Dublin corridor.

## 2. **Priority 1: Growing a sustainable economy and investing in the future.**

**Re Social Enterprise / Community asset Transfer** – while welcoming investment in social enterprise and community asset transfer CCG are concerned that this is seen as the panacea for sustainability of the Com/Vol sector. This commitment will be of benefit to some organisations and not with others and “one size does not fit all”. In fact some organisations have neither the capacity nor finances to operate/run a social enterprise / community asset. A social enterprise should be seen as a contribution towards funding and not seen as replacement for public funding. We are also concerned that asset transfer may be used as a vehicle by statutory bodies to negate responsibilities and to reduce expenditure (eg defer running costs for the upkeep of community used facilities to community organisations).

**CCG would recommend that a capacity building programme to enable communities to understand and prepare for asset transfer / social enterprise be delivered across the region. We would also recommend that a cross departmental community development approach is adopted in relation to funding, social enterprise and asset transfer.**

### **Re Electricity Consumption...**

As members of the Newry Low Carbon City Group CCG feel that the milestones set are not ambitious enough. We also feel that commitments in relation to local and central Government buildings should be introduced.

We regret the fact that the “Green New Deal” has been left out of the PfG - this would have a great impact on our carbon footprint and could lead to the creation of much needed jobs in these recessionary times.

### 3. **Priority 2: Creating opportunities, tackling disadvantage and improving health & wellbeing**

**Re Fuel Poverty** – we welcome a commitment to initiatives aimed at reducing fuel poverty. However neither details nor budget lines are provided making it difficult to comment upon (these glaring omissions are common throughout the document). Fuel poverty is so important that **we feel the draft PfG MUST include definitive commitments to tackling fuel poverty and must have a designated budget.**

**Re Social Investment Fund** – the “Border Region” (which stretches from Newry to Fermanagh) in the SIF typifies the regional imbalance throughout the draft PfG. No reference is made to de-centralising government departments (other than DARD) and we feel that **there is a clear regional imbalance** in favour of Belfast and Derry.

### 4. **Priority 3: Protecting People, environment ..Safer Communities.**

**Re Community Safety** – CCG welcome the amalgamation of DPPs and CSPs into “PCPS” however feel that community organisations (and not just individuals) should be represented at the strategic tier. We also feel that it is unhelpful to assume that community safety is impacted upon by anti-social behaviour only. We feel that community safety will be best served by incorporating community development approaches from the outset.

**Re Regional Transport** - No mention is made of the Regional Transport Strategy – CCG feel that Community Transport (RTF funding) and Assisted Rural Transport are best placed to meet the need of local disadvantaged and isolated communities and that a **commitment to Community Transport should be included in the PfG.**

### 5. **Priority 4: Building a strong and shared community.**



**Re Peace Walls** - CCG welcomes a commitment to seeking local agreement to reduce the number of peace walls.

When developing action plans for individual areas CCG recommend a community development approach similar to that adopted by Community Places for interface areas of Belfast. This approach ensures the support and engagement with residents, community organisations and public agencies alike. We agree that it is important that the skills mix (community development and engagement along with landuse planning) is utilised for the proposed action plans.

## 6. **Priority 5: Delivering high quality efficient public services.**

**New Council model** - CCG are concerned that the 11 council model for local government is not co-terminus with Education and Health Authority structures and feel that re-alignment of these bodies will be required.

**Community Planning** - following transfer of powers local government will be responsible for Land-use Planning and Community Planning. It is essential that local councils fulfil their obligations for engagement and equally important that communities are able to engage with and be part of any local community planning. We feel that the PfG should include milestones for each of these policy areas and recommend that a capacity building programme enabling communities to understand and prepare for these changes be delivered across the region.

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 therefore 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.

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). CCG recommends that a milestone for 2012-2013 be the initiation of a public debate on the merits of introducing a third party right of appeal.

# The Consumer Council NI

## Consumer Council for Northern Ireland response to the 'Draft Programme for Government 2011-15'

### 1. Introduction

The Consumer Council welcomes the opportunity to provide comment on the draft Programme for Government (2011-15).

**The Consumer Council** is an independent consumer organisation, working to bring about change to benefit Northern Ireland (NI) consumers. Our aim is to make the consumer voice heard and make it count. We have a statutory remit to *promote and safeguard the interests* of consumers in NI and we have specific functions in relation to energy, water, transport and food<sup>1</sup>. These include considering consumer complaints and enquiries, carrying out research and educating and informing consumers<sup>2</sup>.

The Consumer Council is also a designated body for the purposes of supercomplaints<sup>3</sup>, which means that we can refer any consumer affairs goods and services issue to the Office of Fair Trading<sup>4</sup>, where we feel that the market may be harming consumers' best interests.

In taking forward our broad statutory remit we are informed by and representative of consumers in NI. We work to bring about change to benefit consumers by making their voice heard and making it count. To represent consumers in the best way we can, we listen to them and produce robust evidence to put their priorities at the heart of all we do.

<sup>1</sup> The Consumer Council undertakes its specific functions in relation to food recognising the role of the Food Standards Agency (FSA). The FSA has responsibility for the development of food policy and for the provision of advice, information and assistance, in respect to food safety or other interests of consumers in relation to food. Therefore, to ensure good value and use of public money, the Consumer Council and FSA have a memorandum of understanding and the Council's strategic focus on food is primarily in relation to food prices and customer experience.

<sup>2</sup> The General Consumer Council (Northern Ireland) Order 1984, 1984 No. 1822 (N.I. 12), <http://www.legislation.gov.uk/nisi/1984/1822/contents>

<sup>3</sup> The Enterprise Act 2002 (Part 9 Restrictions on Disclosure of Information) (Amendment and Specification) <http://www.legislation.gov.uk/ukxi/2003/1400/schedules/made>

<sup>4</sup> The OFT is the UK's consumer and competition authority. Its mission is to make markets work well for consumers. It is a non-ministerial government department established by statute in 1973 <http://oft.gov.uk/about-the-oft/>

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### 2. Format of Response to draft Programme for Government (dPFG)

The response to the consultation is divided into two sections.

**Section 1** provides an overview of the current consumer context and expectations consumers have in terms of delivery and action. This section sets out a number of key overarching priorities which are critical to be addressed within the Programme for Government to help rebuild consumer confidence.

**Section 2** provides further specific comments and recommendations aligned against the priority areas and commitments contained within the consultation.

### **3. Consumer Council Corporate Plan**

The Consumer Council has recently published its Corporate Plan (2011-14) which aims to continue to *'make the consumer voice heard and make it count'*. The key themes within the corporate plan are to:

- Ensuring public policy reflects the needs of today's and tomorrow's consumer;
- Championing and protecting the interests of consumers;
- Informing and empowering consumers; and
- Ensuring CCNI is fit for purpose and delivers value for money.

Recognising the issues and context consumers currently face the operational plan for 2012/13 has focused on the delivery of two key interrelated pillars, namely:

- Cost of Living
- Consumer Proficiency / rights; and

All work undertaken by the Consumer Council during the 2012/13 operating plan period will deliver against one, or both of these pillars.

## **SECTION 1**

### **1.1 A Consumer Agenda for Northern Ireland**

Putting consumers and citizens at the heart of what the Northern Ireland Assembly does is an aim few would argue with. Given the current economic conditions and pressures it is essential the Assembly focuses on key priorities and actions which will support consumers, encourage resilience and rebuild consumer confidence.

This is a critical time for our Assembly who have significant challenges to address in order to support consumers. It is clear public expectations from our Assembly are focused on delivery, impact and improvements not merely status quo or continuing to function.

Confident and optimistic consumers knowledgeable about their rights and responsibilities are essential to driving Northern Ireland forward as a region and as a competitive economy. Consumer sensitivity to price and quality promotes efficiency, lowers prices and moderates the behaviour of firms.

### **1.2 Consumer Context and Expectations**

Northern Ireland consumers are living through tough times and are bracing themselves for even greater challenges ahead. The economy, uncertainty about the future and the cost of living are the biggest concerns for consumers.<sup>5</sup>

Consumers are dealing with the impact of reduced wages, uncertainty in terms of employment; they are tightening their spending and trying to make less go further. In an uncertain economic climate consumers are struggling to make ends meet and have real worries about the impact of public spending cuts.

Consumer confidence remains low and the impact is visible across all areas of Northern Ireland. It is impacting acutely on our younger generation where 18 per cent of 18-24 year olds are unemployed<sup>6</sup> with many emigrating to find employment opportunities. Consumer Council research also shows<sup>7</sup> 25-34 years olds are having most difficulty managing in the current economic conditions. These are the households often with young children, mortgages – potentially in negative equity and carrying student debts.

<sup>5</sup> Consumer 2010 - A Consumer Council research report into the attitudes and concerns of a Northern Ireland Consumer in 2010: <http://www.consumercouncil.org.uk/publications/?id=561>

<sup>6</sup> Labour Market Statistics, February 2012 DETI

<sup>7</sup> Consumer 2010 - A Consumer Council research report into the attitudes and concerns of a Northern Ireland Consumer in 2010: <http://www.consumercouncil.org.uk/publications/?id=561>

This is a critical time for our Assembly to lead on actions to address the challenges which are evident across all communities. The Programme for Government must deal with reality not rhetoric. There is no doubt that achieving the five overarching priorities would represent transformational change. However the key question is whether the 76 commitments which underpin the priorities provide the route to achieve this change. Given the lack of detail on many commitments, lack of clear actions and targets and a concern that many are not ambitious enough or represent existing commitments the Consumer Council would reserve judgement on this.

However the Consumer Council recognises the Programme for Government is high level so we will wish to see confirmation of detail for each commitment (aims, objectives, outcomes, action plans, monitoring, targets and budget). There should also be opportunity for further engagement in relation to the detail to ensure the opportunity to deliver successful outcomes is maximised.

### **1.3 Overarching Priorities for Consumers from PfG**

The Consumer Council has assessed the draft Programme for Government consultation document to consider the potential impacts upon consumers from the actions proposed. The response provided reflects the pressure consumers currently face and the issues they have informed us that they want to see addressed. It is based on our continuing engagement through consumer panels, complaints and enquiries as well as research across our statutory role. As a result of this engagement the three top priorities the Consumer Council believes are an '*absolute must*' to address within the Programme for Government in order to support consumers are:

- Cost of Living (Energy Costs)**
- Consumer Proficiency**
- Financial Capability**

#### **COST OF LIVING (Energy)**

With the cost of living continuing to increase consumers are worried about the price for necessities and these concerns are even more severe among those less well off. Consumer Council research reveals that only four in ten consumers keep up with bills and credit without difficulties. In June 2011 the Consumer Council published 'The Price of Being Poor'<sup>8</sup> report which confirmed the stark reality that many poorer people pay more for everyday essentials such as energy, food and transport. This can mean having

to buy smaller amounts of home heating oil at a higher cost per litre or not being able to access credit at an affordable rate.

The cost of energy is the number one concern for consumers. The draft Programme for Government contains a number of measures to tackle fuel poverty but it must be comprehensively addressed with clear prioritisation, focus and targets.

It is difficult to determine what the commitment '*to introduce and support a range of initiatives aimed at reducing fuel poverty across Northern Ireland*' will actually provide. With fuel poverty levels at 44 per cent (see below) it is...

<sup>8</sup>The Price of Being Poor Report, Consumer Council 2010 SUPPORTS: CREATING OPPORTUNITIES, TACKLING DISADVANTAGE AND IMPROVING HEALTH AND WELLBEING

...clear fuel poverty is a critical issue which must be effectively addressed over the Programme for Government period. There is limited information on the action, initiatives or outcomes to be achieved in relation to fuel poverty within the Programme for Government. Targets, initiatives to be developed, financial support and outcomes must be clearly presented in order to assess whether the commitments will make a lasting difference to people living in cold homes.

Given the levels of fuel poverty (and extreme fuel poverty) Northern Ireland currently experiences it is essential this issues receives the comprehensive emphasis it needs.

**% of households in Fuel**

**Poverty**

**% of households in**

**Extreme Fuel Poverty**

**England** 18.3

**Wales** 26.5

**Scotland** 33.10

**Northern Ireland** 44.13

**Republic of Ireland**<sup>9</sup> 19 Not Available

Northern Ireland has the highest energy bills in the UK and recent statistics show the highest average energy Great Britain bill is around £1,000 cheaper than the average combined oil and electricity bill in Northern Ireland<sup>10</sup>. The increasing cost of energy is affecting nearly everyone in our society. Around 302,000 households<sup>11</sup> in Northern Ireland are struggling to heat their homes to an adequate level<sup>12</sup>.

This Programme for Government period is crucial in ensuring a successful and sustainable response to the fuel poverty crisis that Northern Ireland is currently experiencing. It is essential that fuel poverty is comprehensively tackled in the short to medium term before keeping warm becomes simply unaffordable for the vast majority of households in Northern Ireland. The cost of energy, the reliability of supply, and the sustainability of its generation and use, are all key energy policy issues in Northern Ireland the Programme for Government should address.

The Programme for Government must commit to:

<sup>9</sup>Scott, S. et al. Fuel poverty in Ireland: extent, affected groups and policy issues. Working Paper. ESRI. October 2008

<sup>10</sup> Department of Energy and Climate Change (DECC) 2011 report showed that the highest energy bill in Great Britain was in Cardiff where the average dual fuel bill was £1100pa. This compares to the majority of households in Northern Ireland having an average energy bill as at 16 December 2011 of £2310. The majority of households in Northern Ireland (67 per cent of households here (82 per cent in rural areas) use oil to heat their homes, whereas 87 per cent of GB households use gas.

<sup>11</sup> Housing Conditions Survey 2009, Northern Ireland Housing Executive 2010.

<sup>12</sup> The World Health Organisation defines a satisfactory heating regime as 21°C in the living room and 18°C in other areas.

**(i) the development of a detailed and costed action-plan which sets out how and when fuel poverty will be eradicated in Northern Ireland and**

**(ii) the provision of support to all fuel poor households to stay warm until fuel poverty is eradicated.**

The key components of the action plan should contain a commitment to delivering **seven** key actions:

**Establish a Ministerial Task Force with a duty to eradicate Fuel Poverty in Northern Ireland:** the task force must focus on delivery and bring coherence to achieving clear targets to tackle fuel poverty.

**Area Based Insulation Programme:** the Warm Home Scheme should adopt an area based approach (similar to that of Kirkless Warm Zone) which helped three times as many homes as the Warm Homes Scheme with the same budget

**Energy Brokering:** use the purchasing power of the Government's estate and industry to negotiate lower heating oil, natural gas and electricity tariffs/prices for fuel poor households.

**Energy Regulation:** re-examine what further interventions can be made to reduce energy bills in Northern Ireland

**Oil Regulation:** Develop a strategy to significantly reduce NI's reliance on HHO and in the interim examine whether there is a model of regulation which could provide households with safeguards and standards on price, customer service standards and safe HHO systems.<sup>13</sup>

**Examine incentives and schemes to encourage fuel poor households move to natural gas:** Consumer Council research shows that it costs a household £925<sup>14</sup> per year more to heat a home with oil as compared to gas.

**Winter Fuel Payments:** Ahead of winter 2012, the NI Executive needs to examine the best use of additional public funds (e.g. SPF/SIF) to support people in fuel poverty.

<sup>13</sup> Off Grid Energy, October 2011, OFT stated that it was oddity of the NI market that the most common used heating fuel (heating oil) is unregulated whilst the less common natural gas is fully regulated.

<sup>14</sup> Using average annual natural gas bill for Northern Ireland of £601 and average annual home heating oil bill of £1,526. The gas bill uses a weighting of the number of customers in the Belfast licence area and the 10 Towns licence area, and of the gas consumption levels between different payment types and applies from the 1<sup>st</sup> October 2011. The home heating oil bill is based on the CCNI home heating oil

## **CONSUMER PROFICIENCY**

Improving the income and living conditions for the most disadvantaged including access to goods and services, is vitally important. There is a clear need for the PfG to focus on improving educational attainment, confidence and empowerment.

The Programme for Government can provide a strong lead supporting and educating consumers, especially the most disadvantaged, which can contribute to enhanced skills, confidence and competence.

### **So what else is needed?**

**Consumer Proficiency** describes an individual's knowledge about their consumer rights and their confidence to express these rights and speak up when things go wrong. It also deals with a consumer's awareness of where to go for expert consumer help and advice and their ability to proactively protect themselves from scams and ill-advised purchases.

Confident consumers can shop around for the best value for money on the high street and online. They are also more likely to switch suppliers to get the best deals on personal current accounts, electricity, gas, home heating oil and insurance products. Empowered customers can drive up business performance and profits and stimulate competition which benefits individual consumers, business and the economy as a whole.

Recent research by the Consumer Council's shows a decrease in consumers' awareness of their rights and of their confidence in expressing them<sup>15</sup>. A clear focus is required to help vulnerable consumer groups have the skills to exercise their rights and avoid scams both online and on the high street.

A clear baseline (2007, 2011) exists which measures the level of consumer proficiency amongst Northern Ireland consumers. This can be used to provide a clear indication of progress and impacts toward improving the levels of consumer proficiency during this Programme for Government period.

### **How can consumer proficiency be developed?**

It is essential the Programme for Government supports efforts to raise consumer proficiency levels to help people to cope through this difficult economic period. Consumer proficiency can be developed and improved through sustained information campaigns, direct engagement with...

<sup>15</sup> Consumer Proficiency Research 2012, CCNI – due to be published March 2012  
SUPPORTS: CREATING OPPORTUNITIES, TACKLING DISADVANTAGE AND IMPROVING HEALTH AND WELLBEING

...consumers and developing the expertise of teachers and frontline workers in the advice, community and voluntary sectors.



It is also important to develop businesses awareness on consumer law and best practice in customer care as this benefits both consumers and business performance.

### **Importance of PFG supporting action to raise consumer proficiency**

While all consumers suffer some detriment through lack of consumer skills, the consequences for vulnerable consumers have the potential to be more damaging and far reaching. Addressing this issue in the PFG could empower consumers particularly those in the most deprived areas and in vulnerable groups to know their rights and responsibilities so that they can make well informed choices and get a fair deal when buying goods and services.

## **FINANCIAL CAPABILITY**

It is no surprise that the economy remains the primary focus within the Programme for Government given the current uncertainty and difficulties.

The current economic challenges facing consumers are well known, as is consumers' uncertainty and declining confidence.

The economic downturn has already hit many of Northern Ireland consumers hard and there is genuine fear that we are on the brink of a second dip into recession. Evidence that the recession is taking its toll on the Northern Ireland consumer is clear when 52 per cent of Northern Ireland's adult population are worried about making ends meet now and 64 per cent state they are worried about making ends meet in the future.

Many consumers are experiencing financial difficulties and face significant challenges that will require long term solutions. But it must be recognised that consumers are central to revitalising our economy and our region.

Consumer confidence has a huge effect on the economy, with consumer spending accounting for over 60 per cent of UK GDP<sup>16</sup>. Consumer sensitivity to price and quality promotes efficiency, lowers prices and moderates the behaviour of firms.

<sup>16</sup> 'Through Consumers Eyes', Consumer Focus Report, December 2011  
SUPPORTS: GROWING A SUSTAINABLE ECONOMY AND INVESTING IN THE FUTURE

Empowered and informed consumers are therefore central to the economic recovery of Northern Ireland. It is essential the PfG faces both ways – toward supporting business and the labour market but also to consumers who drive the economy and demand. Co-ordinated action is essential to support effective change to empower consumers, improve confidence and make a real difference to the cost of living.

### **So what else is needed?**

Given the current economic climate, it is essential that **Financial Capability** skills are developed to improve consumer resilience and decision making.

Supporting consumers to become more financially capable is an essential objective the Executive should advance which would provide long-term sustainable improvements for Northern Ireland.

Being financially capable means having the skills and confidence to manage your money and use it wisely. It means being prepared for a rainy day, saving in a safe place, maximising your income by getting all the financial help to which you are entitled, having the appropriate insurance cover, being prepared for your retirement and knowing how to get independent financial or debt advice when it is needed.

Enabling consumers to get the most from their money by being able to manage it and make sound financial decisions is a vital part of improving the economy. Having the skills to manage your money, plan ahead and make sound financial decisions will make a difference to individuals, the community and the economy.

Northern Ireland is the only region of the UK not to have developed a Financial Capability Strategy despite consumers in Northern Ireland having the **lowest** levels of financial capability than consumers elsewhere in the UK<sup>17</sup>.

#### **How would the Economy and Consumers benefit?**

Developing a strategic framework to improve financial capability would help individual personal finances and quality of life and ensure consumers can manage better in difficult financial times. This can help reduce levels of problem debt in Northern Ireland and on a broader level help mitigate the impact of reduced public spending on consumers. It will contribute to boosting consumer confidence whose spending is essential to supporting and strengthening the economy.

Many households are facing uncertain times and have limited security in terms of income or steady employment. Financial Capability can help build...

<sup>17</sup> *Managing Money: How does Northern Ireland add up?* 2007, The Consumer Council, (A research report based on the Financial Services Authority (FSA) UK Baseline Survey).

...resilience by providing the skills and confidence to manage finances during uncertain or changing times. It is an important support skill and ensures people are supported at times when they are vulnerable and facing difficult financial pressures.

**It is essential the Programme for Government contains a commitment to developing and implementing a Financial Capability Strategy or Framework which provides a clear focus on improving the levels of financial capability of Northern Ireland citizens.**

## **SECTION TWO**

There are a number of commitments contained within the draft Programme for Government which cut across several areas of interest to the Consumer Council. Additionally many of the commitments impact or have the potential to impact on the statutory role of the Consumer Council to represent consumers.

Section 2 provides in table format comment on a range of the commitments contained in the consultation document. These focus on the proposed action, the detail provided and

other considerations the Consumer Council believe should be examined as part of finalising the final Programme for Government document.

## **Priority One: Growing a Sustainable Economy and Investing in the Future**

### **Air Passenger Duty**

Aviation is key to the recovery and development of Northern Ireland's economy. As an island region Northern Ireland consumers are more dependent on air links than the rest of the UK.

The PfG contains a commitment to eliminate Air Passenger Duty on direct long haul flights (Band B). This will see the current levy reduce from £12 per person to zero. The Executive are to be commended for their work in securing a reduction in the current rate of APD for direct long haul flights. However, the vast majority of flights to and from Northern Ireland are on Band A (short haul flights) to other UK airports. Approximately 75% of journeys to and from Northern Ireland are to other UK airports, compared with 18% for the rest of the UK<sup>18</sup>.

The PfG does not consider the burden of APD on the vast majority of consumers or indeed its relevance as a barrier to the development of further links to the UK and other short haul destinations. Positive action on APD at the Band A level would benefit the vast majority of air passengers. It would increase the affordability of flights for passengers and remove a barrier to the development of further links to the UK and other short haul destinations

### **Renewable Energy Generation**

Northern Ireland is dependent on imported fossil fuels for around 98 per cent of its energy needs, and spends around 10 percent of its GDP on energy<sup>19</sup>. This dependency on fossil fuels and exposure to international fuel prices has been acutely highlighted highlight over the last year with significant increases in the prices Northern Ireland's consumers have to pay for electricity, gas and oil:

- Electricity prices have risen by up to 18.6 per cent.
- Gas prices have risen by up to 39.1 per cent.
- Heating Oil prices have risen by 31 per cent

The high proportion of fossil fuels in Northern Ireland's energy mix plays a significant role in our carbon emission levels, which in turn contributes to global climate change. Significant investment in our energy infrastructure is needed so that Northern Ireland can be more sustainable economically and environmentally in its energy supply. However, it is important that this...

<sup>18</sup> Civil Aviation Authority 2010 passenger statistics

<sup>19</sup> DETI, Strategic Energy Framework, 2010

...investment is consumer focused as with significant levels of fuel poverty in Northern Ireland, it remains important that the energy policy and regulation are focused on providing consumers with this infrastructure at the best possible price.

DETI's Strategic Energy Framework sets a target that 40 per cent of electricity consumption by 2020 should come from renewables. This will only be achieved in a cost effective manner to consumers if the planning process supports and prioritises the development of renewable energy deployment and a focus on:

- Encouraging households to move to switch from oil to gas - as heating oil is considerably more expensive and produces more carbon emissions than gas;
- Increased and coherent emphasis on energy efficiency measures in Northern Ireland; and

Investment is needed in Northern Ireland's electricity grid to accommodate a significant growth in renewables.

### **Regional Connectivity**

Connectivity to the UK and further afield is essential for consumer, tourism and the economy. The PfG fails to consider in sufficient detail access to Northern Ireland, whether consumers currently face disadvantage and opportunities to improve connections.

Issues relating to air connectivity have been detailed above but the PfG does not make reference to the importance of our sea routes or how the Executive will seek to ensure that our ports and harbours will play a vital role in supporting the recovery and development of the Northern Ireland economy.

Consumer Council research<sup>20</sup> found that when compared with English Channel crossings, many consumers felt the cost of ferry travel from Northern Ireland to Scotland was too high and could see no plausible explanation as to why there is such a difference. In our report we highlighted that during July, August and September 2011 the average fare for a family of four travelling with a car between Northern Ireland and Scotland with Stena Line is £261.06 and with P&O is £268.58. By comparison the average cost of travel between Dover and Dunkirk with DFDS is £67.57.<sup>21</sup>

A commitment from the Executive to investigate options for making ferry travel more affordable for consumers would have the potential to increase visitor numbers and tourist revenue and support the economy.

<sup>20</sup> Ferry Travel – A Consumer Council Report on the perceptions and experiences of ferry passengers in Northern Ireland. December 2010

<sup>21</sup> The fares are for a family of 4 travelling with a car. The fares are averaged for the price of sailings booked 2, 4 and 8 weeks in advance for midweek travel (Wednesday – Wednesday) and weekend travel (Saturday – Saturday) and are based on a one week lag time between departure and return dates.

## **Priority Two: Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing**

### ***Water and Sewage Services***

The NI Executive has committed to no domestic water charges before 2015. This provides the opportunity to look at the longterm financing of this vital public health service. The PfG should commit to a longer strategic view which examines issues such as:

- Affordable water and sewerage services
- Security of supply
- Drinking water quality, supply and demand
- Sustainable wastewater collection and treatment
- Protecting and improving the water environment
- Flood risk and flood risk management
- Proposed development of a regional strategy for water
- Long-term arrangements for water funding, regulation and governance

The dPfG milestones/outputs for this commitment are to “apply policy”. We feel that an opportunity will have been lost if this period, while policy is being applied, is not taken to look in depth at different structural options and examine the long-term sustainable future of water and sewerage services able to secure consumer confidence.

### **Affordable Homes**

The Consumer Council welcomes the commitment to build 800 more social and affordable homes. All new buildings should encapsulate the highest level of energy efficiency standard. It is important the energy efficiency and energy usage problems of Northern Ireland's existing housing stock are not exacerbated. Poorly designed buildings can lead to many consumers to paying energy bills that are unnecessarily high – which can ultimately lead to them suffering from fuel poverty. It is in the long-term interests of Northern Ireland's Building industry that Building Regulations reflect the best standards in Europe, so that they can develop the necessary skills to compete with their counterparts elsewhere.

### **Thermal efficiency of Housing Executive stock**

Poor energy efficiency within a home is one of the main influences in a household becoming fuel poor. The Consumer Council would question if the commitment to provide double glazing is the best use of a limited budget, and whether more households in fuel poverty could be helped by ensuring all social housing properties were installed with cavity wall and loft insulation, before being provided with energy efficient glazing and doors.

According to analysis undertaken by Accenture<sup>22</sup> the cost of providing energy efficient glazing and doors is around £3,096 per property. This investment provides savings of £211.45 per year off their energy bill. A similar saving can be made by installing either cavity or wall insulation for a twelfth of the cost (£250 per property). If both measures were installed a household could make savings of around £313.24 per year off their energy bill.

The 2009 House Conditions Survey shows that 6140 (5.6 per cent) of social housing had no wall insulation and that 67,530 (74 per cent) of social houses did not have adequate loft insulation. This compares to 31,120 (28.2 per cent) of social houses which did not have full double glazing. By prioritising the more cost effective and energy saving measures of loft and cavity wall insulation over double glazing measures significantly more households could be helped with lowering their energy bills.

The Northern Ireland House Conditions Survey showed that housing within the Private Rented sector had significantly lower levels of energy efficiency measures than Social Housing properties. In addition the levels of fuel poverty were higher in the private rented sector than households in social housing. Therefore, whilst this measure is welcome greater focus needs to be placed on how the energy efficiency levels within the private rented sector can be improved

### **Measure Cost per Property<sup>1</sup> Annual Saving on Energy Bill<sup>1</sup>**

#### **No. of Households<sup>23</sup> Approx. Overall Cost to NI Executive**

**Double Glazing** £3096 £211.45 31,120 £96M

**Loft Insulation** £250 £140.96 67,530 £17M

**Cavity Wall** £250 £172.28 6,140 £1.5M

<sup>22</sup> Achieving High Performance in the Home Energy Services Market, Accenture, November 2011

<sup>23</sup> 2009 House Conditions Survey, NIHE 2010.

### **Rural Poverty and Social Exclusion**

Approximately 35% of the population of Northern Ireland live in rural areas (roughly 630,000 people<sup>24</sup>. Poverty and social exclusion are key issues facing in rural communities but are often hidden and difficult to reach. The PfG does commit £13 million to tackling poverty and isolation in rural areas which is welcome – details on the measures to be undertaken will be developed over the first year and it is essential this is carried out with rural communities, key stakeholders and other departments.

The PfG must also focus on access to services and the issue of transport and safety on rural roads. The key issues include the lack of public transport, the impact of rising fuel prices, and the high cost of motor insurance in rural areas. Whilst it is an accepted fact that mobility is an essential requirement in modern day living, the challenge for many living in rural areas is that around 20% of people living in these communities do not have access to a car which provides them with the challenges of accessing transport to employment and essential services.

### ***Social Protection Fund***

The Social Protection Fund (SPF) must be used as a strategic approach to providing long term sustainable response to poverty and social exclusion across Northern Ireland.

The Consumer Council welcomed the announcement in December 2011 that £23 million was to be paid to fuel poor households. The additional fuel payment, made to almost 250,000 households, helped cover the costs of heating their home during this winter. This was a necessary and immediate response to the heating crisis many homes faced.

However it was a one-off payment and the Executive must focus on preventative measures which have a long-term focus on reducing poverty and social exclusion as opposed to reactive approaches. For example investing elements of the Social Protection Fund now in measures such as energy brokering, energy efficiency and incentives to encourage fuel poor households to move to natural gas could all help tackle poverty and support people to keep warm throughout the year.

### ***Social Investment Fund***

The Consumer Council welcomes the aim of the fund which is to encourage communities to work together with statutory agencies, business and departments in a co-ordinated way to reduce poverty and enhance existing provisions. We believe the key themes could be strengthened by encouraging and enabling communities to address:

- Financial capability and inclusion
- Transport provision
- Consumer proficiency
- Cost of Living

It is essential clear criteria and rationale is provided for focusing on the zones identified and the actions to be delivered. Many rural communities are already concerned that poverty and social exclusion issues are missed or underreported due to current deprivation measures.

<sup>24</sup> Statistical Review of NI Agriculture 2010

### **Extend Age Discrimination legislation on provision of goods, facilities & services**

The CC believes that the consumer principles of choice, access, information, redress, safety, fairness and representation should be reflected in proposals to extend age discrimination on the provision of goods, facilities and services. This legislation will effect consumers who use public transport, utilities, financial and retail services. The Consumer Council is willing to share research carried out directly with NI consumers and assist OFMDFM in shaping this important piece of legislation.

## **Priority Three: Protecting our People, the Environment and Creating Safer Communities Responsible Consumerism**

The Consumer Council welcomes the draft Programme for Government commitment to continue to work towards a reduction in greenhouse gas emissions by at least 35 per cent on 1990 levels by 2025. The Consumer Council believes, however, that Northern Ireland should have a long-term target for reduction of greenhouse gas emissions mirroring the commitment for an 80 per cent reduction in emissions by 2050 as set by the UK Climate Change Act. This target would help guide transition to a sustainable future, informing government, industry and consumers of the changes sustainable development will require in the long-term.

It is important that Government engages with consumers to provide simple, easily understandable information regarding the financial and environmental costs of different consumption choices if they are to make changes to their consumption behaviour.

Consumer Council research<sup>25</sup> indicates the majority of consumers have a very limited understanding of issues relating to sustainable production and consumption.

### **Justice and offenders**

The Consumer Council is committed to empowering consumers so they can make the best decisions about their money. We believe money management skills are key in helping overcome and address many factors which may contribute to offending.

Offenders often experience difficulty managing their money, budgeting and making sound financial decisions. There can also be uncertainty and low confidence in applying for financial services such as bank accounts and accessing affordable credit. It is important that they develop skills in relation to financial capability. This will support them to achieve a sustainable transition out of the criminal justice system, and enhance broader life skills and employability. The Consumer Council is working to learn more about a settings-based approach to inform the development of a financial capability strategy for NI which engages persistent hard to reach groups, for example offenders and victims. We believe further consideration should be given to financial capability training and advice within the Justice system. This could include benefit maximisation, budgeting and making sure they are getting the best deal in relation to utilities and insurance.

### **Sustainable modes of travel**

The PfG commits to investing £500 million in sustainable forms of transport and there is a commitment within the Economic Strategy which seeks to 'invest to improve our transport infrastructure and to do so in a smarter and more sustainable way.'

The Consumer Council supports this commitment; however, when considered against the budgets already allocated to Translink, the investment figure of £500 million does not appear to have much scope for further improvement.

The Economic Strategy confirms that over £500 million will be invested in a programme of measures to secure more sustainable modes of travel and achieve an annual average of 77 million journeys by public transport. This target of 77 million journeys has been in place since at least 2008 and was contained in the Public Service Agreement 2008-11 between DRD and Translink.

Translink have been achieving this target since 2007/08. Therefore, the investment of £500 million will at best keep pace with what has been happening since at least 2008 and it could be

argued that the investment will not 'secure MORE sustainable modes', it will simply maintain the status quo. It will not improve investment in public transport and the fact that the target for

<sup>25</sup> Data taken from a series of CCNI focus groups conducted in December 2010.

...public transport passenger journeys will be the same in 2015 as it was in 2008 confirms that there is no expectation to improve modal shift which has been a key aim of the Regional Transportation Strategy since 2002.

The programme for government should therefore contain a commitment to rebalance the Regional Development Transport budget and achieve the 65:35 funding split between roads and public transport as set out in the Regional Transportation Strategy 2002.

### **Active Travel**

The draft programme for government contains a commitment to 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 Consumer Council welcomes this but feel more should be done across a range of journey types such as the commute to work. This should also include the role of public transport and CCNI believes that in addition to this commitment all government departments should develop travel plans to educate their staff about more sustainable options for undertaking work related journeys.

The school journey and work journey are often linked and therefore it would require a comprehensive response to consider these issues together rather than in isolation. This would support our call for a high level, joined up approach to the provision of transport that links in with planning, education, health and other sectors to ensure that consumers have the option to use more sustainable forms of transport to undertake essential journeys and make the most efficient use of resources.

The programme for government should commit to fund the development of active travel, not just one isolated type of journey.

### **Drinking water quality and investment in infrastructure**

£600m is a substantial investment over the dPfG period. However, the Consumer Council has concerns that cuts in capital budget will create a gap in funding and that longer term funding levels are seriously inadequate.

The draft Investment Strategy for Northern Ireland 2011-21 (dISNI) clearly explains that investment is needed and allocates £100m per year to water and sewerage services beyond 2015. For 2010 – 2013 it has been determined via the Price Control process that NI Water requires around £200m per year to maintain and enhance its water and sewerage infrastructure to meet agreed targets. The £100m per year would cover the costs of maintaining the existing infrastructure only. It is unlikely to deliver the improvements necessary to meet the NI Executive's EU targets, close the gap on existing commitments and provide for future development plans.

The reality of restricted finances over the PfG and ISNI period require solutions that are more sophisticated than simply investing in capital projects and building more. A catchment management approach is needed focused on outcomes. A 25 year strategic view will help facilitate this. A commitment across Government to this strategic plan would be a welcome addition to the final PfG and/or ISNI.



## **Priority Five: DELIVERING HIGH QUALITY AND EFFECTIVE PUBLIC SERVICES**

### **Public Services**

The Consumer Councils welcomes the PFG has provided a wider focus than simply structural reform (i.e. council, health and social care, education etc) by providing commitments in relation to improving access to public services and improving outcomes for consumers.

It is essential any reform of public services, whether structural, operational or changing priority or focus has the consumer interest to the fore. The evidence locally and nationally clearly shows that the public wishes to have high quality, responsive, accessible, efficient, effective and accountable services which promote, maintain and enhance quality of life for all. Consumers expect to be valued as individuals and to be treated with dignity, fairness and respect.

The Consumer Empowerment Strategy<sup>26</sup> envisages an environment where consumers are fully informed and empowered to make the better choices. It provides a challenge both to business and Government to improve the information, access and choice that is provided to consumers. Consumer expectation and understanding of public services have increased significantly over the last number of years It is essential all public services (and the professionals delivering them) are responsive to the needs and expectations of consumers.

The PFG should commit to assess any proposed changes to how public services are designed or delivered are tested against a 'Consumer Focused Framework' which:

<sup>26</sup> **Consumer Empowerment** Strategy; Better Choices: Better Deals. Consumers Powering Growth', BIS 2011

- a. Applies the 'Consumer Principles' (choice, access, information, redress, safety, fairness and representation) to all models and service delivery options
- b. Informs and Empowers consumers through information, support and advice
- c. Involves consumers in a meaningful way in designing, planning, delivering and assessing public services
- d. Develop the capacity and leadership of professionals to fully embrace a consumer focused culture and approach
- e. Finds new and better ways to work to improve the service for consumers

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The Fermanagh Trust



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21<sup>st</sup> February, 2012

**Re: Draft Programme for Government**

The Fermanagh Trust welcomes the opportunity to respond to the draft Programme for Government. Having managed a Shared Education Programme in the county, which is now in its third year, we welcome the inclusion of two priorities on Shared Education. Namely:

- Establish a Ministerial advisory group to explore and bring forward recommendations to the Minister of Education to advance shared education;
- Ensure all children have the opportunity to participate in shared education programmes and substantially increase the number of schools sharing facilities;

**Definition of shared education**

Developments in education policy over the past decade (including the Bain Report, Entitlement Framework and Area Learning Communities) have been marked by increased support for school collaboration and cooperation. Within this policy context Shared Education refers to schools from different sectors working together and is distinct from Integrated Education which involves the removal of sectoral differentiation in favour of unitary common schools.

Shared Education has the potential to contribute to school improvement and access to opportunity, encourage more effective use of resources, and promote social cohesion through the achievement of a shared and better society. It can range from two or more schools making shared use of specialist facilities, through to coordinated timetabling and pupils taking classes across a network of schools. Research evidence shows clearly that the greatest reconciliation impact is achieved when the level of engagement between pupils and teachers across a network of schools is regular and sustained.

## **The Context for Shared Education**

The Fermanagh Trust became involved in Shared Education through recognition of the need to support, protect and enhance communities, particularly rural and isolated communities within the County. For minority, Protestant communities living side by side with their nationalist neighbours, the local school, church and Orange Hall are focal points and the loss of one could spell the end of that community and further depopulation. The impact on the whole community is also serious and irreversible. Where communities are supported to share resources, as they do for farming, community relations improve and the potential for disorder is minimised.

Schools in the rural West, through the Shared Education Programme have shared resources, expertise and ideas; and built relationships across and between Governors, Principals, teachers, parents and the wider community. A DVD exemplifying the educational, social, community and relational outcomes from the Programme is enclosed and is available at the following link: <http://vimeo.com/channels/sharededucation>

## **Timescales**

While we do welcome the commitments in the draft Programme for Government, the times-scales for both the Viability Audits and the Area Planning Processes, have, we feel, impacted negatively on the potential for schools and communities to explore and develop Shared Education solutions. This will impact negatively on the two suggested priorities, as schools which would have wished to pursue Shared Education options may have been identified as potentially unviable which could create a run on schools with parents withdrawing children or not sending children there in the new school year.

The Terms of Reference for the Area Planning Process state:

Given the size of the cohort of pupils requiring stand alone special schools and the regional nature of this provision, the Minister has requested that this area is prioritised and plans are submitted to the Department by end February 2012\*.

The initial plan covering post-primary provision, including 6<sup>th</sup> form provision, should be submitted to the Department of Education not later than end March 2012\*.

The plan covering the primary provision should be submitted not later than end June 2012\*.

*\* These dates are indicative at the moment and will be subject to discussion with the Education and Library Boards.*

## **Recommendation 1**

- *We recommend that the indicative time scales for the Area Planning Process be revised until the Ministerial Advisory Group on Shared Education reports on what policies need to be revised to allow for Shared Education to be implemented and what legislation may be needed to allow schools to explore Shared Education options*

While the Viability Audit does not refer to Sharing, the Terms of Reference for the Area-based planning process, which were released on 15<sup>th</sup> December state: "In delivering an area plan the Boards, working with CCMS and engaging extensively with other school sectors should take account of the guidance issued by the Department and seek to fulfil the following aims/objectives to:-

- identify realistic, innovative and creative solutions to address need, including opportunities for shared schooling on a cross sectoral basis"

We have asked the Minister, the Department, officials and senior politicians that the following clause be inserted into the Guidance notes:

"Cross-sectoral options must be explored in the area planning process. Only after shared solutions are examined thoroughly, can area plans move to intra-sectoral proposals, giving reasons why shared solutions will not work. Where there are legal impediments, voluntary arrangements will be considered, while the outcomes of the Shared Education Ministerial Advisory Group on legislative and other matters are awaited".

These intensive efforts have been required because Shared Education is not seen as "the norm" or how we should do business day to day. The sectors remain focused internally in terms of planning and Shared Education is not the default position yet in thinking or practice. The danger with the proposed priority that all children should have access to a Shared Education Programme by 2015 is that it suggests additonality. However, should the Common Funding Formula incentivise Shared Education at all levels – classes, teachers, administration, shared Governing arrangements and Shared Faith schools (to which the sectors have no objection) then Shared Education will become the default position.

## **Recommendation 2**

- *We believe the funding formula should be changed to incentivise sharing, so that the policy is mainstreamed and not seen as an additional programme.*

We refer to (AQW 5310/11-15). Mr O'Dowd: "The draft Programme for Government includes a commitment to ensure all children have the opportunity to participate in shared education programmes and to substantially increase the number of schools sharing facilities by 2015. This will deliver educational benefits in terms of raising standards and more efficient use of resources, as well as building good relations. All Departments are required to fulfil the statutory duty to have regard to the desirability of

promoting good relations between persons of different religious belief, political opinion or racial group. In keeping with this statutory duty, my Department already considers how all policy development and spending decisions contribute to promoting good relations. This approach to mainstreaming good relations considerations into policy development and resource allocation will further be considered as part of the development of the final Cohesion, Sharing and Integration strategy.”

Reflecting the Minister’s intention, we have drafted the following objective, action and target as a guide:

Objective	Action	Target
Enhance social cohesion and good relations among young people in local areas	<ul style="list-style-type: none"> <li>▪ Facilitate collaborative working across schools creating a more interdependent system</li> <li>▪ Review the way in which schools are currently financed</li> <li>▪ Initiate a policy of ‘share proofing’ which favours ‘sharing over separation’ in the provision of capital projects and significant education policies</li> <li>▪ Inclusion of shared education as a priority in the revised CSI policy document</li> </ul>	<p>In 2012-13 to mainstream number of pupils taking regular classes on a shared basis – currently 10,000 per annum</p> <p>Beyond 2012-13 a significant increase year-on-year pupils engaged in shared classes</p> <p>By 2012-13 a schools funding mechanism in place which incentivises cross-sectoral sharing</p> <p>By 2012-13 DE has adopted a ‘share proofing’ policy with implementation guidance.</p> <p>By 2012 -2013 – shared education is priority in CSI policy</p>

### The Legislative Context

The establishment of ESA will impact positively on sharing as, by its very nature, it encourages and facilitates collaboration in a progressive manner. Legislation will be required to establish ESA and under the current arrangements the Boards and the CCMS have specific duties and responsibilities, also established under law. These are:

The Education and Libraries (NI) Order 1986 (Articles 5 and 6) outlines the duty of the Education and Library Boards to secure efficient and sufficient provision of primary and secondary education within the board area to meet the needs of all pupils.

Article 142 of the Education Reform (NI) Order 1989 places a subsidiary statutory duty on CCMS to promote and co-ordinate the planning of the effective provision of Catholic maintained schools.

### Recommendation 3

- *We recommend that the legislation which governs the establishment of ESA also considers what legislation is needed to advance the mainstreaming of Shared*

*Education, e.g. for the setting up of joint Board of Governors and Shared Faith Schools.*

- *If the time-scales for the ESA legislation run concurrently with that of the proposed Ministerial Advisory Group we recommend the option for additional legislation or further legislation is spelled out in the relevant Order.*

### **Ministerial Advisory Group**

In terms of the Ministerial Advisory Group on Shared Education, we suggest the following Terms of Reference and Membership:

#### **Recommendation 4**

- *We recommend that the Terms of Reference for the Ministerial Advisory Group include the following:*
  - 1) To review research evidence on the impact of shared education
  - 2) To identify best practice models of shared education which promote positive educational, economic and reconciliation outcome
  - 3) To review key Department of Education policies in order to encourage and incentivize shared education, this to include:
    - a. Identifying ways in which funding procedures for schools can support and encourage enhanced sharing
    - b. Examine ways to introduce 'share-proofing' in policy and practice in order to favour sharing over separation
    - c. To identify mechanisms to incentivize shared capital developments, particularly in relation to shared use of specialist facilities
    - d. To encourage shared provision of staff development opportunities and promote local area engagement between teachers from different schools
    - e. To identify ways in which shared options can inform strategic planning of education following the *Putting Pupils First* Ministerial statement
  - 4) To include shared education as a key priority in the emerging CSI policy document and build key performance indicators on sharing into the CRED policy in order to ensure that all children will have an opportunity to participate in shared education by 2015
  - 5) The Ministerial Advisory Group will report and make recommendations to the Minister within six months of its first meeting on how Shared Education can be advanced within Northern Ireland. The work of the Group will be time-bound and at the end of its first three months may produce an interim report to reflect points below
  - 6) The Ministerial Advisory Group will advise and make recommendations to the Minister on a process or mechanism for how those schools identified as being

under stress by the Viability Audit can be supported to identify Shared Education solutions

- 7) The Ministerial Advisory Group may hear from representatives of these schools and the communities affected on how they can be supported to identify Shared Education Solutions
- 8) The Ministerial Advisory Group will meet with the relevant sectors and will make recommendations to the Minister on how and where Shared Education can be built into the Area Planning Process
- 9) The Ministerial Advisory Group will define the objectives for a Northern-Ireland wide Shared Education Programme and make recommendations for greater sharing of classes, teachers, administrators, Governors and schools. It will be able to draw on the full resources of the Department of Education in the execution of its task
- 10) In the course of its work, the Ministerial Advisory Group may call witnesses, commission short pieces of research, and hear from those stakeholders with an interest/expertise/knowledge of Shared Education
- 11) The Ministerial Advisory Group will make recommendations to the Minister on what, if any, legislation is needed to advance Shared Education

## **Recommendation 5**

- *We recommend the following principles govern the membership of the Ministerial Advisory Group and we recommend the following individuals as members*
- That the membership is limited to a number capable of carrying out the work effectively and efficiently and includes at least two members of the Shared Education Learning Forum (SELF).

That the membership reflects those with expertise in and local knowledge of shared education and a strategic vision for shared education as a policy and how it should be implemented in practice. The membership of the Group must include creative thinkers and key visionaries.

That a number of Departments are represented to reflect the reach of Shared Education Solutions, reflecting the variety of Departments involved: Education, OFM/DFM, DARD (Rural issues) and DRD (Transport).

That the Department (s) make available to the Group key personnel with knowledge of school finances/legal issues.

1. Professor Colin Knox, (SELF representative)
2. Professor Tony Gallagher (SELF representative)
3. Mr. Lauri McCusker, Director, The Fermanagh Trust (SELF representative)

4. Paul Sweeney, Permanent Secretary, Department of Education
5. ESA representative
6. CCMS representative
7. Transferor's representative
8. OFM/DFM representative (Colin Jack)
9. DARD representative (Rural issues)
10. DRD representative (Transport)

## **Conclusion**

While we welcome the inclusion of the two Shared Education priorities, we believe the draft Programme for Government doesn't go far enough and that Shared Education will be seen as an "add on" to the school curriculum rather than an integral part of the education system and curriculum.

We also believe the time scales of current viability audit and area planning processes negate against opportunities that exist to promote Shared Education, thereby helping to meet the two objectives.

We also feel there should be an education and awareness programme in schools, communities and supported by a public information campaign to give people more information about what Shared Education options are available to them as they reflect on future educational provision in their area.

Yours Sincerely

Lauri McCusker  
Director



## The Irish Central Border Area network Ltd

### PROGRAMME FOR GOVERNMENT – 2011-15 – CONSULTATION REPLY PROFORMA

<b>Name:</b>	
<b>Organisation:</b>	<b>Irish Central Border Area Network Ltd (ICBAN)</b>
<b>Contact Details:</b>	<b>ICBAN, New Hope Centre, 2 Erne Road, Enniskillen, BT74 6NN</b>

#### 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 Irish Central Border Area Network Ltd (ICBAN) is an organisation that brings together member Councils from 10 Council areas within both N.I. & RoI that are in close proximity to each other adjoining the border. Established in 1995, the organisation has enabled these Councils and the communities they serve from the Central Border Region to effectively identify and address common issues and problems on a regional cross-border basis. The organisation, as one of 5 cross border groups on the island, has been extensively involved in the draw down and delivery of EU funding, through the INTERREG cross-border funding programme in particular. ICBAN is currently leading in the delivery of a range of cross-border projects involving Councils and other cross border partners. These include development programmes, infrastructure projects and the delivery of a pioneering Spatial Planning Initiative for the Central Border Region. It is therefore in the context of these interests that the organisation responds to the Draft Programme for Government.**

**We welcome that one of the key principles identified in rebalancing and rebuilding the economy is Balanced Sub- Regional Growth, however, it would be important that this key principle is given the same importance as Equality and Sustainability within the document. For example on pages 26 -27 it states, "This is why the Executive considers it imperative that economic growth and wealth creation is achieved in a way that is both fair and sustainable....". This reference should also state that growth and wealth creation must be balanced regionally.**

**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**

**It is ambitious to set out such challenging commitments at the start of such a document and the approach by the Executive in this regard is to be welcomed. More detail however could and should be provided on how the Programme can actually be delivered upon. It is referenced that this is being delivered against a backdrop of a global and national recession and that one of the key challenges will be in managing this within the confines of a constricted block grant and budget from the Treasury. To therefore sufficiently link the commitments and vision as it were, to plans for delivery, there needs to be a greater elaboration on the budget and financing than is currently provided. Otherwise this can beg the question, how real and substantiated can the Programme be?**

**It would further strengthen the document if there was a reference to the EU as a source of funding and linkage, in line with initiatives such as the NI Executives' European Priorities for 2011 – 12. Given that the EU is a key contributor to many development initiatives, it would usefully serve to have such references in place, thereby linking the PfG into EU2020 etc,**

**Under Annex 1: Programme Arrangements and Delivery Frameworks, the Executive should be mindful that these management levels must have sufficient regional representation also.**

**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**

**There isn't a very clear linkage between the range of Commitments set out and the 5 Priorities. It would be easier to comprehend if "Our Commitments" were broken up into sub-categories that then can be mapped against "Our Priorities". Without such an exercise it can be difficult to appreciate why these 5 priorities in particular have been chosen. More detail on the approach linking the Commitments to the Priorities is recommended.**

**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 We welcome that the First and deputy First Ministers are, "...also committed to addressing regional imbalance as we move ahead". The importance of having Balanced Sub-regional Growth as one of the key principles in rebalancing and rebuilding the economy has been previously noted.**

**We would however contend that there has not been due recognition within the Programme of the challenges and difficulties experienced in border regions. In the implementation of the Programme the Executive must prove that they are actively and effectively addressing Sub- regional issues. Therefore the degree to which regional imbalance is being addressed should be monitored and reported upon at all 3 levels stated in the Delivery Framework.**

**It would be important that the ongoing reviews for each of the Programme for Government and the Regional Development Strategy should complement each other and should not be done in isolation.**

### 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

**It would be regarded that some of the key issues facing border regions and communities are not being adequately addressed. For example, on Telecommunications there are ongoing problems with black spots in the rural areas that effects how people work, study, interact socially and conduct general business. Therefore a priority should also be the governments continued commitment to meeting telecommunication targets in line with EU 2020, etc.**

**With regards to infrastructure investments the Executive should include in the Programme a re-affirmed commitment to delivering the A5 dual carriageway project, as well as highlighting the importance and need to carry out further improvements to the A4 cross-border corridor linking Ballygawley (and the Northern Cross interaction there with the A5/N2) via Enniskillen to the West. These investments would help achieve the reduction in journey times on key transport corridors by 2.5% on a balanced sub-regional basis.**

**Recent work by senior personnel within the ICBAN Councils has identified the importance of Tourism and particularly the untapped wealth of natural assets that exist in areas such as the Central Border Region. It is felt that the tourism targets in the Programme must be ambitious and challenging and that the Departments and authorities responsible should consider the growing potential for unspoilt natural tourism attractions.**

**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**

**It would be important that border communities can benefit to the same extent as others throughout Northern Ireland. Geographic equality and equity should be as important a consideration as other criteria. Border communities, such as those in the Central Border Region, do feel neglected in comparison to other areas when it comes to a share of investment and government spending. Border communities should therefore not be neglected or supported to a lesser degree on the basis of their distance from Belfast and other key hubs.**

**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** ICBAN's key issues have been noted in sections 1 -6.



## The Mummings Foundation

### Strawcraft – “Working with Tradition”

- Aughakillymaude Community Association formed 1988 to revive traditional Arts and crafts at its Loughshore location in West Fermanagh.
- Also in 1988 the Aughakillymaude Mummings was formed, a traditional masked folk drama group whose straw costumes are recognised as iconic, ancient disguises stretching back to the Iron Age (when literary sources point to masked entertainers performing at Inauguration ceremonies at Navan Fort, Armagh).
- 1988 – 2003 – Aughakillymaude mummings became internationally recognised through international festivals as traditional folk entertainers of masked ritual performances due to their adherence to wearing traditional straw plaited straw disguise involving straw conical shaped masks, straw plaited jackets, unplaited straw skirts, straw leggings and straw armbands.
- 2005 – 2012 – The Mummings Foundation, a strategic, separate and legally organised mumping body based at the Aughakillymaude mummings centre organises public strawcraft workshops mainly revolving around the making of straw plaited and unplaited masks – the iconic symbol of masked traditions in Ireland which are also “termed” straw boys, wren boys, mummings, ban beggars, guisers or hogmany men.
- 2007 – Opening of the UK and Ireland’s sole Mummings centre ( a permanent exhibition of life sized mumping sculptures that compliments the Aughakillymaude community centre in West Fermanagh).
- 2008 – 2012 – Expansion of Heritage based strawcraft work including making of straw plaited hens nests, straw baskets, straw mattresses and straw mats = all using traditional plaited methods (for display in the mummings museum).
- 2008 – 2012 – Diversification into profiling the tradition of rushwork involved in the making of various forms of brigid crosses, butterfly catchers and baby rattles and rush lights.
- 2009 – strawcraft workers in Fermanagh attended annual Strawcraft Guild UK conference where the emphasis is all on finite strawcraft i.e. corn dollies, harvest love knots.
- 2008 – 2011 – A core body of strawcraft workers exist at the mummings centre. The established men are ranging from mid 60’s to 80’s whereas the women range from the mid 40’s. All are passionate and many originate from farming backgrounds.

- **Work** – Strawcraft workers are employed to train people (young and old) in all aspects of strawcraft and rushwork at the mummings centre. Also, the strawcraft workers have an outreach portfolio conducting demonstrations at festivals, fayres, craft shows, agricultural shows, schools and take on special commissions.
- 2011 – **Year of Craft**, Aughakillymaude Mummings Centre staged a 3 day summer school of harvest love knot and corn dolly making. The centre is full to capacity with cross border visitors – all women. There is a clear demand for this type of strawcraft product i.e. it's making and to sell as gift goods.
- “Straw Mad” – The Aughakillymaude Mummings Centre continues to source oaten and wheaten straw grown in Fermanagh from a number of ageing farmers. This in turn provides the raw material for the continuation of strawcraft work classes.

### **Objective**

- Sustaining the interest in strawcraft work the Aughakillymaude community association now wish to increase the capacity and skills of existing and new strawcrafts people under the guidance of the Strawcraft Guild UK.
- Courses, ranging from taster, “chat and plait” to NVQ level 2 and 3 in strawplaiting will be put in place with an emphasis on the more finite aspects of strawcraft so as to enable production and sale of gift goods such as harvest love knots, corn dollies, mini mummer hats.
- In liaison with the Heritage Crafts Association UK, master crafts classes will also ensure the retention and passing on of acquired skills and knowledge and design involved in the making of traditional heritage related straw products e.g. straw mattress, mats, hen’s nests, straw mumming disguises.
- A dedicated strawcraft centre acting as a sub regional training hub will be located on the same site as the Aughakillymaude mummings centre where an established reputation exists for strawcraft work, rush work and, to a lesser extent, basketry work.
- The Association are also in the process of securing land adjoining the Mummings Centre to be used as demonstration project for the sowing, growing and traditional harvesting of various types of grain straws i.e. wheat, barley, oats and Rye. This will form part of the cultural tourism project experience at the Mummings Centre.

08 October 2012

To Whom It May Concern:

We enclose a submission as part of the Inquiry into the Creative Industries Sector by the Northern Ireland Assembly Committee for Culture, Arts and Leisure.

The Mummerns Foundation, a company LTD by guarantee, a registered charity and a not for profit organisation has profiled traditional strawcraft, rushwork and, more recently finite strawcraft at the Aughakillymaude Mummerns Centre based in South West Fermanagh since 2005.

It is clear to the Mummerns Foundation that the living heritage of traditional strawcraft work is "at risk" due to ageing profile of rural people who once traditionally grew and traditionally harvested grain straws.

In recent years from 2005 onwards the Mummerns Foundation recognised that finer aspects of strawcraft and rushwork are more relevant to modern day living and desire for ornamental gift goods that relate to the heritage of the land, place and people.

To sustain the interest in reviving straw plaiting and rushwork the Mummerns Foundation, based in West Fermanagh will involve the Strawcraft Guild UK, the Heritage Crafts Association and Craft NI in enhancing the capacity of existing strawcraft workers, training of new interested learners and raising the profile of both the heritage and economic value of both traditional and finite aspects of strawcraft and rushwork. We wish, of course, that both Heritage based strawcraftwork and rushwork be recognised as a potential economic driver within the creative industries sector and an authentic cultural tourism product within the N Ireland brand.

It is our position that little detailed knowledge or research has been yet undertaken on the existence of strawcraft or rushwork within the creative industries sector.

We ask that this aspect of Heritage crafts is not just forgotten about as we deem strawcraft working to be at risk as part of the living Heritage of rural Northern Ireland.

Heritage crafts and rush work are like a golden thread that links our past, present, and future and is a reminder that the diversity and individuality of craft mirrors the quality of people themselves.

Yours sincerely

Jim Ledwith

Company Secretary

# Draft Programme for Government

## Response from the National Trust

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February 2012

The National Trust welcomes the opportunity to comment on the draft Programme for Government. Our response is based on our submission to the Environment Committee, and focuses in particular on gaps in the draft programme, milestones and outputs, and monitoring progress.

### 1. Introduction to the National Trust

The National Trust is the largest conservation charity in Northern Ireland and actively promotes the protection of our natural, built and cultural heritage. The Trust protects and provides access to some of the finest coast and countryside, historic houses, gardens and industrial heritage in Northern Ireland.

We work proactively with a number of government departments and agencies, and other partners across the business and voluntary sector, to promote a well-protected, healthy environment and natural and built heritage assets which are valued and enjoyed by all. The Trust enjoys the support of 4 million members, including over 55,000 members in Northern Ireland.

### 2. Gaps

#### 2.1 *Vision and context*

The draft Programme for Government contains an impressive list of commitments and has an understandable focus on growing the Northern Ireland economy. However, we are concerned that the draft largely continues the theme of previous PfGs and completely misses the opportunity to take the bold but essential steps to move Northern Ireland on a path to a more sustainable, low carbon economy which is more environmentally resilient.

Although the draft reflects on the global economic challenges we face, it does not give the global **environmental** context which would highlight the pressing challenges of climate change, and the need to address related issues including energy security and food security. This context is essential as it should inform and inspire a much more ambitious and robust programme of change, leading to a

Northern Ireland society which lives within its means in environmental terms. It is essential that the final PfG is framed in this global environmental context and that this context then informs more targeted and integrated programmes of action.

We would also make the case that pro-actively addressing the environmental challenges we face will bring economic and social benefits which will support the delivery of the PfG's vision for the economy, rather than introduce costs and constrain development.

## 2.2 *Implementation of cross-cutting themes and integration*

As with previous PfGs, the current draft sets out five priority areas which are intended to be cross-cutting. However, we are concerned that there remains a gap in the delivery mechanisms for the cross-cutting themes, in that work programmes are largely organised and led by single Departments. More effective means of inter-departmental working should be explored, allowing major issues for Northern Ireland – such as fuel poverty, energy efficiency and development of renewable energy supplies – to be tackled as integrated work programmes, rather than single-issue actions.

## 2.3 *Commitments to deliver change*

There are some notable gaps in the commitments in the PfG. We are particularly concerned that there is no commitment to introduce a Climate Change Act with legally binding targets. This is essential to secure the target of a 35% reduction of GHG by 2025.

While we welcome the commitment to maintain high quality drinking water and improving waste water standards compliance, there should be a specific commitment to provide the resources to ensure that all NI's water bodies achieve good ecological status by 2015, as required by the EU Water Framework Directive. Related to water quality, we note the commitment to ensure there are no additional water charges during this PfG. This is disappointing, and at the very least, there should be a programme of education and awareness to ensure that during this PfG term, public understanding is increased about the actual costs of providing water and sewerage systems for modern society. This would lay the groundwork for appropriate charging in the future.

There is a commitment to protect and enhance our natural environment, but a worrying and very disappointing lack of reference to the built heritage of Northern Ireland. Much of our built heritage, especially in our towns and cities, is of intrinsic significance and can also be a key driver for economic and social regeneration. For example, a target to find appropriate new uses to secure the future of some of our most iconic buildings could act as a catalyst for significant investment and regeneration.

While we understand the Northern Ireland Marine Bill is shortly to be introduced in the NI Assembly, to reflect the UK Marine and Coastal Access Act 2009, we think it would be important to see this important workstream to be reflected in the PfG. The future effective management of our seas should be a high priority during this PfG period. Ideally we would like to see a Marine Management Organisation introduced as a key mechanism for implementation of the Marine Bill and to provide suitable structures for the integrated management of all coastal and marine activities.

There is a commitment to ensure 90% of large scale investment planning decisions are made within six months. We broadly welcome this, providing of course that all the necessary environmental and economic assessments and consultation happens, and that the quality of the outcome is not sacrificed to achieve a speedy decision. We are very strongly opposed to the reference to giving planning applications with job creation potential additional weight. We would contend that any planning application must be decided within existing planning policy and therefore this reference should be removed. We note that the proposed PPS24 Economic Considerations was withdrawn by the current Environment Minister on the basis that it was not required.

It would be much more appropriate and effective for the PfG to have a broader range of commitments in relation to the planning system in Northern Ireland. Our planning system is not yet fit for purpose and by 2016 we need a planning system which is more effective in delivering sustainable development (social and environmental as well as economic), supporting a thriving economy and protecting our special landscapes and natural and built heritage.

We welcomed the discussion paper by the Environment Minister on environmental governance, and we are very disappointed to see no reference in the PfG to move towards an independent environmental protection agency.

### 3. Milestones and outputs

Many of the concerns we have in relation to the milestones and outputs have been addressed above, as they refer to areas which have been omitted completely and should be added in, with appropriate annual targets. The outputs also reflect and reinforce the single issue/departmental led delivery mechanisms which may well impede the achievement of more ambitious integrated solutions to the challenges we face.

Some of milestones or outputs are clear and specific – e.g. those relating to increasing visitor numbers and tourist revenue (notwithstanding that this is a re-statement of existing commitments). By contrast, some of the targets relating to the protection of the environment are much less specific, for example

that on GHG emissions simply restates the intention each year to project towards a 2025 target of 35%. Annual targets are necessary to allow effective monitoring of progress towards the target.

4. Monitoring progress

Annex 1 of the draft PfG sets out the programme arrangements and delivery framework, at a high level. This states that effective monitoring and quarterly reporting regimes are a prerequisite. We would welcome this, and would urge that the reporting should be transparent and public. Effective monitoring requires good baseline data and clear targets. Consideration should be given to a simple 'top line' reporting mechanism which would enable the general public to have a broad understanding of progress toward delivery of the key milestones relating to each of the five programme areas.

5. Conclusion

Please note that the National Trust is a member of Northern Ireland Environment Link, and we fully endorse the comments included in the NIEL submission.

We hope the comments above are helpful and we are happy to discuss any of these points in more detail if required.

For further information please contact:

Diane Ruddock

External Affairs Manager, Northern Ireland



**Prince's Trust**

**Response to the consultation on the  
draft Programme for Government 2011 - 2015**

**22 February 2012**



## Background to The Prince's Trust

1. The Prince's Trust was established in 1976 and helps on average 3,000 young people aged 13 – 30 every year in Northern Ireland. We work exclusively with disadvantaged and marginalised young people who experience a range of personal barriers that prevent them from moving into education, training or employment. These young people fall into one or more of the following four groups:
  - Young people who are unemployed, particularly long-term unemployed;
  - Young people who are leaving care;
  - Young people who are underachieving at school or who are at risk of exclusion;
  - Young offenders and ex-offenders, including individuals at risk of criminality and antisocial behaviour. Over 22% of all young people that we support are offenders or ex-offenders.
2. Three out of every four young people who complete one of our programmes achieve a positive outcome, including progressing into education, training or employment.

## General Comments

1. The Northern Ireland Executive is to be applauded for its unity of purpose in producing a draft Programme for Government 2011 – 2015 (PfG) that underlines how far the Executive has come and its determination to make a difference to the lives of the most vulnerable in our society.
2. The Prince's Trust acknowledges that the draft PfG is an extremely comprehensive document and sets ambitious targets. The risk, however, is that with a total of 76 commitments the Executive may struggle to deliver under the sheer volume of goals set by individual Ministers across each of the twelve Departments. Whereas, a strategy with a limited number of high level commitments would have provided much more clarity and focus around the outworking of the Programme and greater opportunity for joined up delivery over the next three years.
3. That said, as a statement of intent the PfG has much to offer, including key commitments to promote 25,000 new jobs; the inclusion of social clauses in all public procurement contracts; making the Education and Skills Authority operational by 2013; £40m under the Social Investment Fund to improve pathways to employment, tackle systemic issues linked to deprivation and increase community services; supporting people (with an emphasis on young people) in to employment by providing skills and training, increasing the proportion of young people from disadvantaged backgrounds who achieve at least 5 GCSE's at A\*- C or equivalent including GCSE's in Maths and English; and improving literacy and numeracy levels among all school leavers, with additional resources targeted at areas of educational underachievement.

4. The success of the PfG will ultimately depend on how clear and measurable its outputs are, and crucially, how well each Department works across Government and with organisations at grassroots level to deliver the Executive's commitments over the next three years.

## Tackling Youth Unemployment

1. In the five years to the end of December 2011, the number of young people who are not in education, employment or training (NEET) has jumped by 20% to 48,000; youth unemployment among 18-24 year olds is currently estimated at 19,000 or almost one in every five young people; and nearly a third (29.7% or 18,500) of all JSA claimants in January 2012 are under 25 at a cost of over £51m per annum.
2. As part of the process of making a response to the PfG consultation, The Prince's Trust carried out a focus group with ten young people who have been supported on one of our personal development programmes in February 2012 and asked them three key questions (see appendix 1 for an overview of their responses).
3. Despite the seriousness of the problem and a real possibility that JSA payments to under 25's could exceed £150m over the next three years, which barely scratches the surface when you add on the long-term costs in, for example, the Health Service, Social Security and Justice system, Northern Ireland still does not have a coherent strategy for tackling youth unemployment and specifically the rising levels of young people who are NEET.

Even if a strategy is agreed before the abolition of the Department of Employment and Learning (DEL), where and how will the strategy be implemented and who will be accountable or even champion it across Government?

DEL may have been slow to produce a strategy, but in the absence of a ministerial lead on youth unemployment and specifically NEETs there is a real risk that the PfG will fall short of its commitment to support more young people into employment over the next three years.

**Around the UK:** In recognition of the seriousness of youth unemployment, the Scottish Government created a new junior ministerial post, the Minister for Youth Employment, in December 2011, with a £30m budget and responsibility for tackling youth unemployment.

4. The PfG needs to set a measurable target/output for supporting young people who are unemployed and/or NEET to develop skills, get meaningful work experience and to move into sustainable employment. This output should form part of the PfG's existing commitment under priority 2: *Support people (with an emphasis on young people) into employment by providing skills and training.* The annual cumulative outputs under this commitment should

include a breakdown for under 25's who are unemployed and/or NEET and have been supported to move into employment.

**Around the UK:** In recognition that young people are essential to sustainable growth, the Scottish PfG (2011/12) has guaranteed that all 16-19 year olds will have access to learning or training opportunities to help them move into employment. Recognising that youth unemployment remains far too high, the Scottish Government has committed to providing 25,000 Modern Apprenticeships and 46,500 work focused training opportunities in 2011/12, with the majority of opportunities targeted at young people.

5. To ensure clear accountability and meaningful cooperation between Departments to support more young people who are NEET into employment, the draft PfG needs to firstly, clearly state which Department will lead on meeting the targets under this commitment following the abolition of DEL, and secondly, how other Departments can mobilise their resources to support the lead Department. For example:

- DETI could look at expanding schemes like the Jobs Fund to provide a wider range of small and medium size employers with financial incentives designed specifically for taking on young people who are NEET;
- DRD has already indicated that as part of its recently announced £500m investment in Northern Ireland's roads infrastructure and creation of up to 2,500 jobs over the next four years, there will be opportunities for the long-term unemployed. Under the PfG, DRD could link into the lead Department on NEETs by including specific social clauses in all future public procurement contracts that require the construction sector to link with youth charities such as The Prince's Trust to provide work experience and apprenticeships for young people who are NEET. Similarly, the £92m capital investment announced by DHSSPS could include provision in future contracts for the Local Hospital in Omagh, redevelopment of Altnagelvin and the Ulster Hospital that require construction companies to take-on unemployed young people who have for example, left care and completed an initial personal development programme with youth charities such as The Prince's Trust.

**Around the UK:** The Scottish PfG (2011/12) has made it compulsory that all recipients of major public contracts have to provide new training and apprenticeship opportunities that are particularly targeted at unemployed young people.

- DSD could look at the possibility of developing financial incentives for employers who have won contracts with the Housing Executive to take on long-term unemployed young people and receive an equivalent of one full year of JSA payments (currently £2,779 for under 25's) as a contribution towards the young person's salary.

**Around the UK:** In England, the announcement of a £1bn Youth Contract in November 2011 by the Coalition Government to help over 400,000 unemployed 18-24 year olds get a job, includes 160,000 wage subsidies worth up to £2,275 each for employers who recruit young people,

250,000 work placements and at least 20,000 more incentive payments to encourage employers to take on young apprentices.

- OFMDFM's commitment to *invest £40m to improve pathways to employment, tackle systemic issues linked to deprivation and increase community services through the Social Investment Fund (SIF) presents a unique opportunity to pilot a range of innovative projects over the next three years that support more vulnerable groups of young people*, including care leavers and priority offenders, to develop the confidence and motivation to progress onto more structured training programmes that lead to employment.

**Around the UK:** In recognition that the most vulnerable young people often need extra support to stay in education and training, the Scottish PfG (2011/12) includes a commitment to complete the roll-out of Activity Agreements – tailored programmes of support, activity and learning specifically designed to ensure the most vulnerable 16-19 year olds can progress into more formal education and training.

Faced with a limited budget of £3m per annum to help support a range of new measures to reduce barriers to employment (NI Budget 2011/15) and with no specific budget allocation in the PfG for improving pathways to employment for young people who are NEET, any commitment by the Executive to improve the participation of young people in education, employment and training will depend, in part, on the level of investment provided by OFMDFM under SIF in the short to medium term and investment from the Social Protection Fund in the medium to longer term.

## In Conclusion

1. The Prince's Trust welcomes the commitment by the PfG to improve pathways to employment for young people. However, we would call upon the Executive to go further, and like Scotland acknowledge that youth unemployment and particularly the number of young people who are NEET remains far too high.
2. From this position, the Executive can use the PfG to clearly spell out how all of the Departments can work together to respond more decisively on the issue, with a particular focus on preventative spend to ensure, for example, that we deter priority offenders from reoffending through measurable interventions that help them to move into training and employment, thereby generating considerable savings for the Department of Justice, which can be reinvested back into those communities hardest hit by crime and anti-social behaviour.
3. Departments such as DoJ and DHSSPS for example, could use their allocation under the Executive's annual £75m 'Invest to Save' Fund to fund new preventative initiatives with priority offenders and care leavers that help them to turn their lives around and effectively deliver long-term savings for the Department.

4. This shift away from dealing with the fallout of young people being long-term NEET towards dealing with the root causes through preventative actions that help them to move into training and employment would enable the Executive to:
  - Deliver real improvements across range of commitments outlined in the PfG;
  - Achieve considerable long-term savings and
  - Help more young people to break the cycle of poverty and inequality that continues to put a huge pressure on many of our frontline services.
  
5. Finally, a clear commitment in the PfG to build more meaningful cooperation between Departments and with organisations working at grassroots around the issue of NEETs should make it much easier in future for Departments to gather evidence to identify what is working and to be clear that when an approach is ineffective it should not be supported any longer.

For further information, please contact Mark Dougan, Head of Public Sector Partnerships, The Prince's Trust on 028 90758103 or [mark.dougan@princes-trust.org.uk](mailto:mark.dougan@princes-trust.org.uk)

## **Appendix 1**

### **Key Issues Facing Young People**

- State of the economy
- Recession – frame of mind that there are no jobs available so there is no point/motivation
- Homelessness
- Unemployment
- No/Few job opportunities
- Not enough opportunities for young people
- Stereotyping/Discrimination based on appearance
- Doing courses that they might not want because of no jobs in different areas
- Lack of education and experience
- Lack of skills
- Lack of experience – need 6 months to 1 year for most jobs
- Young people's talent/abilities unrecognised
- Low self-esteem being unemployed and signing on the dole
- Depression
- Lack of confidence
- No motivation
- Lack of social life
- Easy to slip into crime and drugs
- Misuse of drugs/alcohol etc
- Prison/Criminal Record/gangs
- Family disputes
- Casual work – signing off for one day's work, lose two weeks Jobseekers, hassle of signing on again.

- Lack of support on getting into work
- Social security agency unhelpful
- Pointless qualifications

### **What was the Turning Point in My Life**

- The opportunity of opening my own business thanks to The Trust
- The Prince's Trust Team Program
- The Prince's Trust Wider Horizons
- Getting on a Prince's Trust Team Program
- Going on a Trust program, otherwise would still be sitting at home
- Mother being tough on me
- Mother and family helping me
- People's negative comments on life/current situation
- Being self-employed for a while
- Part-time employment
- Youth housing
- Recession – economic downturn leading to loss of jobs/no job opportunities

### **How Can the Northern Ireland Executive Help?**

- Pay employers to take on young people and give them the chance to go and work and monitor them more.
- More work placement schemes with better pay
- More job opportunities
- More careers advice
- More funding
- More funding for projects
- Government can set aside funds to help charities like the Prince's Trust – Prince's Trust only opportunity/support for young people
- Need more Steps to Work programmes in different areas
- Need better qualifications on Steps to Work programmes/courses etc
- Guidance counsellors in every school – need to be interested in helping young people, motivated about their jobs, care about what they are doing.
- "Re-educating the education system"
- Sort the schools out
- Benefits system currently doesn't work – sign off if doing one day's casual work costs you two weeks Jobseekers Allowance, loss of certain benefits if you get into work/onto a course.
- Asking young people for their say/input
- More personal development skills
- By organising group events to meet new people, get young people off their X-boxes and get them helping others and getting the feel good feeling again.
- Go out and visit young people
- Lower prices on public transport so young people can travel further to try and get into work.
- Visit young people in prison, help to do programs
- Lead by example

## Professional Forum



Julie Greenfield  
Professional Forum Manager  
The Pharmacy Professional Forum  
73 University Street  
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BT7 1HL

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

### **Consultation on draft Programme for Government 2011-2015**

The Professional Forum (hereafter referred to as “the Forum”) is the professional leadership body for pharmacy in Northern Ireland.<sup>1</sup>

The Forum welcomes the opportunity to comment on the draft Programme for Government (PfG) 2011-2015.

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<sup>1</sup> <http://www.psnl.org.uk/professionals/professional-forum/professional-forum.php>

Northern Ireland's pharmacists have always played a vital role in the community, delivering much more than simply a medicines supply service. Pharmacists are at the heart of the health service and their communities, delivering expert advice to the public on the high street without the need for an appointment.

As a professional body, the Forum wishes to see that role not just continued but expanded and enhanced in the years ahead. By so doing, pharmacists will play a central role in helping the Northern Ireland Executive achieve the goals of its Draft Programme for Government.

The Forum would like to make the following key points, which are explained further in the attached document.

### **Draft Programme for Government 2011-2015**

- A healthy population is vital to ensure the economic success of Northern Ireland
- The Forum is disappointed that only five of the 76 commitments in the PfG are health-related, given that the Department of Health, Social Services and Public Safety spends 40% of the Budget.
- Northern Ireland has persistently high levels of health inequalities. Therefore the emphasis on the need to proceed with better early intervention and prevention, and the increase in funding to the public health budget, incrementally over the three years to reach an additional £10 million per year recurrently by 2014-15 is very much welcome.
- This commitment and the milestones to be achieved over the four year period could be developed further with specific public health targets related to smoking, alcohol and obesity for example.
- Population health and wellbeing and reducing health inequalities is not just a matter for the Department of Health, Social Services and Public Safety (DHSSPS); it also requires joint action across government and partnership working. In most cases, only the lead government department is identified and it is not clear how commitments will be developed and delivered collaboratively.
- The document outlines the commitments that will be delivered by each relevant government department. However, there is no mention or recognition of the contribution of other key stakeholders to the achievement of these priorities such as pharmacists.
- The Forum seeks more clarity as to how the Executive intend to progress the commitments outlined in the PfG, lines of accountability and regular monitoring particularly where there is a need for more than one department to deliver on those commitments and milestones.
- The recent Review of Health and Social Care<sup>2</sup> is a major driver in the development of Health and Social Care reform for the next five years. The Forum believes there is scope to reflect the recommendations in the Compton report and develop particular commitments and milestones set out in the PfG. There is broad consistency in the messages outlined in the draft PfG and in the Review of Health and Social Care.
- For example, there is already an existing PfG commitment to “reconfigure our network of health and social care services to improve patient outcomes and access to new treatments.”
- The Review of Health and Social Care makes a number of recommendations related to expanding the role of community pharmacists and the management of long term conditions. The Forum would like to see these recommendations reflected in the PfG.
- Recent review of pharmacy budget and subsequent reduction in funding could impact on the future development and potential role of community pharmacy.

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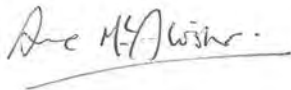
<sup>2</sup> [Transforming Your Care: Review of Health and Social Care in Northern Ireland](#) (December 2011)



- Northern Ireland's pharmacists have always played a vital role in the community, delivering much more than simply a medicines supply service. Pharmacists are eager to play a central role in helping the Northern Ireland Executive achieve the goals of its Draft Programme for Government.

The Forum would be willing to discuss its response to this consultation with you. The Forum would also be pleased to supply any further evidence that may be required in support of the points made in our submission. We would also wish to be fully involved and consulted, where appropriate, in further work and look forward to future engagement.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Anne McAlister", with a horizontal line underneath it.

Mrs. Anne McAlister

**Chair of the Pharmacy Professional Forum NI**

## **1. Draft Programme for Government 2011-2015**

### **1.1 Strategic Priorities**

The Forum supports the five priorities on page 26 of the document and fully agrees that there is a need to grow the economy to help transform our society and enhance our environment.

We welcome the recognition that a strong modern economy is built upon a healthy, well-educated population backed by high quality public services. Whilst there is much focus on the development of the economy and private sector, this however should not be at the expense of the provision of effective and necessary public services.

The central focus of our response will outline the Forum's views on how pharmacists can deliver for the Executive and the people of Northern Ireland, the tools required, and the barriers to be overcome.

## **2. Priority One: Growing a Sustainable Economy and Investing in the Future**

## **2.1 Key commitment: Allocate an increasing percentage of the overall health budget to public health (DHSSPS) (This should contribute to society and the economy by tackling disadvantage)**

The emphasis on the need to proceed with better early intervention and prevention and the increase in funding to the public health budget, incrementally over the three years to reach an additional £10 million per year recurrently by 2014-15 is welcome.

The key outputs of this commitment to be achieved over the four year period could be developed further with specific public health targets related to smoking, alcohol and obesity for example. (The Forum has outlined our suggestions below.)

The Review of Health and Social Care<sup>3</sup> recommended an enhanced role for community pharmacists in health promotion, for example, in relation to information and advice around obesity and weight management, alcohol use and minor ailments.

The Forum believes this should be reflected in the PfG commitments and that pharmacists should be recognised and included in public health strategy discussions and policy delivery.

## **2.2 Tackling Obesity through Pharmacy**

In the most recent survey of Northern Ireland's health and wellbeing, 59% of all adults measured were either overweight (35%) or obese (24%).<sup>4</sup> Pharmacy has a key part to play in tackling obesity which we recommend is recognised in relation to any proposals that the PfG may make in this area.

Given the accessibility that community pharmacy provides to the population, it is uniquely placed to support the delivery of health improvement measures. Indeed, due to the unique location of its services, pharmacy is well placed to reach some of the most difficult to reach social cohorts, such as deprived communities, often being open when GP surgeries are not, with a health professional available without appointment.

For example, community pharmacies have a central role in the prevention and treatment of obesity through:

- Recognition and the provision of medical advice
- Management and referrals
- Measuring and explaining BMI; the provision of dietary and lifestyle advice;
- Advice on realistic goals for weight loss
- Regular checks and analysis of food diaries

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<sup>3</sup> [Transforming Your Care: Review of Health and Social Care in Northern Ireland](#) page 57 (December 2011)

<sup>4</sup> NI Health and Social Wellbeing Survey 2005/06, DHSSPS

- Education on calorie and fat intake general nutrition and reading of food labels and
- Advice on physical activity.

### **2.3 Reducing Smoking Rates through pharmacy**

Reducing smoking is a high priority for public health and the Forum believe this should be reflected in the PfG.

Smoking remains the single greatest cause of preventable illness and premature death in Northern Ireland, and is also the leading cause of health inequalities in our society<sup>5</sup>. In Northern Ireland around 340,000 people aged 16 and over smoke and it causes around 2,400 deaths per year. Total annual inpatient costs to health and social services in Northern Ireland as a result of smoking were estimated at £119million in 2008/9.<sup>6</sup>

All the evidence to date shows that people who receive regular support and advice throughout the quitting process are more likely to succeed, and one of the most accessible sources of advice and support can be found through community pharmacy. Indeed research from a controlled trial in Scotland demonstrated that by training pharmacists and their staff to counsel smokers on the basis of the theory of behavioural change, quit rates doubled.<sup>7</sup>

The Forum is also mindful of research conducted by the DHSSPS into smoking cessation<sup>8</sup> which demonstrates that pharmacy is the preferred location for members of the public to receive smoking cessation services.<sup>9</sup> DHSSPS statistics for 2010/11 also show that 66% of people who set a quit date did so through community pharmacy.

The Forum recommend that, to tackle lifestyle associated conditions and their cost to the health service, such as those brought on by smoking, the DHSSPS should set itself a challenging figure for the reduction of smoking. The Welsh Assembly Government has recently proposed aiming to reduce the smoking rate to 16% by 2020.

The Forum suggests Northern Ireland should match or beat this target of reduction. The pharmacy profession stands willing and able to help the Department meet such a target.

### **2.4 Screening, prevention and early intervention through pharmacy**

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<sup>5</sup> Chief Medical Officer's Annual Report, 2009

<sup>6</sup> RCP (2000) Nicotine Addition in Britain: A report of the tobacco advisory group of the RCP applied to 2008/9 HRG costs. In: Ten Year Tobacco Control Strategy for Northern Ireland Consultation Document.

<sup>7</sup> Sinclair HK, Bond CM, Lennox AS, Silcock J, Winfield AJ, Donnan P. Training pharmacists and pharmacy assistants in the stage of change model of smoking cessation: a randomised controlled trial in Scotland. *Tobacco Control* 1998; 253-261

<sup>8</sup> Statistics on Smoking Cessation Services in Northern Ireland

<sup>9</sup> *Ibid*, p37.

Creating a more efficient health service means thinking innovatively, including appropriate investments in the kinds of screening and preventative health services that can be provided through pharmacy to make larger savings as a result of early interventions.

A wide range of screening services can be provided through community pharmacies. A great advantage of screening through pharmacy is pharmacists tend to see a broader cohort of people to those who see their GP and therefore can access and diagnose people who otherwise would not have been tested.

The Forum consider there is underexplored opportunity to capture more undiagnosed diabetes and vascular disease cases through pharmacy in Northern Ireland than is currently the case, and that therefore this form part of the Executives considerations when considering the final version of the PfG.

### **3. Priority Two: Creating Opportunities, Tackling Disadvantage and Improving Health and Well-Being**

3.1 The Forum has a particular interest in the commitment under the priority: **Enrol people who have a long-term (chronic) condition, and who want to be enrolled, in a dedicated chronic condition management programme (DHSSPS)**

#### **3.2 Key milestones/outputs identified**

- **2012/13:** Identify and evaluate the current baseline of patient education and self management support programmes that are currently in place in each
- **2013/2014:** Health and Social Care Board / Public Health Agency should work with key stakeholders to develop and secure a range of quality assured education, information and support programmes to help people manage their long term conditions effectively, alongside full application of the Remote Telemonitoring contract
- **2014/15:** People with a long term condition will be offered access to appropriate education, information and support programmes relevant to their needs, including innovative application of connected Health Trust area

#### **3.3 How pharmacy can help?**

There are increasing numbers of people with chronic conditions such as hypertension, diabetes, obesity and asthma.

The Review of Health and Social Care<sup>10</sup> support the early intervention and the use of community pharmacists as suggestions for better care for people with long term conditions.

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<sup>10</sup> [Transforming Your Care: Review of Health and Social Care in Northern Ireland](#) page 57 (December 2011)

The Review of Health and Social Care also highlights the key role the community pharmacy will in assisting people with LTCs. The community pharmacist will form part of the multi-disciplinary approach to the management of LTCs. Pharmacies are ideally placed within local communities to provide advice without appointment.<sup>11</sup>

The Review recommends a stronger role for community pharmacy in medication management for long term conditions. People with LTCs often have multiple medicines to help manage their symptoms. Compliance with the directions for medications use is key to the successful use of the medicines.

The Forum believes the Review's recommendations on how community pharmacists can assist people with long term conditions should be reflected in the PfG commitments.

The Forum also point to the Scottish Government's Health Delivery Directorate action plan on improving multi disciplinary collaboration on LTCs<sup>12</sup> published last year, which addressed this point and commended the use of clinical portal technology as introduced in NHS Tayside and NHS Greater Glasgow. The technology promotes easier access to information by professionals, including pharmacists in both primary and secondary care, to assist care delivery and decision making and continues to be expanded in its application in that country.

The Forum recommends the DHSSPS conduct a bespoke learning exercise, examining how the NHS in Scotland has promoted easier access by healthcare professionals to relevant patient information, the costs and benefits of doing so, and how and when such access could be promoted in Northern Ireland.

#### **4. Priority Three: Protecting Our People, the Environment and Creating Safer Communities**

##### **4.1 Key commitment: Implement a levy on single use carrier bags by 2013 (DOE)**

On 30 January 2012 it was announced that a five pence levy on single use carrier bags will be introduced in April 2013. We understand that there will be a consultation on the draft regulations and exemptions will be considered. The Forum would like to take this opportunity to reiterate our position.

The Forum counsel strongly that the DOE take cognisance of the roll out of the scheme for charging for single use carrier bags in Wales. Under the terms of the scheme in Wales, bags which are supplied by a pharmacist or in a pharmacy to carry free prescriptions (or other items

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<sup>11</sup> Supporting people with long term conditions to self care: A guide to PCTs in developing local strategies and good practice, Department of Health, 2006

<sup>12</sup> <http://www.scotland.gov.uk/Resource/Doc/309257/0097421.pdf>

which are supplied free on the NHS) are not included in the charge. This includes free smoking cessation products supplied by an NHS stop smoking clinic or therapy devices provided free in a specialist NHS occupational therapy clinic.

We call for a similar exemption to be applied in Northern Ireland in the interest of patient safety and confidentiality. However other non-prescription products sold in a pharmacy which might be bought in other retail outlets (e.g. hair brushes, deodorant etc) would be subject to the carrier bag charge requirements.

We endorse the Welsh settlement of pharmacy's position within a bag charging regime to the DOE (NI).

## **5. Priority Five: Delivering High Quality and Efficient Public Services**

**Reconfigure our network of health and social care services to improve patient outcomes and access to new treatments**

### **5.1 Key commitment: As part of a shift in the delivery of services to primary and community settings reduce the number of days patients stay in acute hospitals unnecessarily (excess bed days) by 10% compared with 2010**

The Forum welcomes this commitment and believes that pharmacists can play a part in delivering this target. We urge the PfG to take cognisance of the Review of Health and Social Care and the recommendations as to how pharmacists in primary and secondary care pharmacy can play a key role.

The Forum consider that, in the interests of patient outcomes, reducing hospital readmission and tackling medicines wastage, patient education about their medicines should be made a condition of discharge.

The Forum consider there is greater scope for expanding the practice of medicines education prior to discharge, and that it should therefore be considered for expansion within the goals of the PfG. Models for consideration consider in this area include the new Discharge Medicines Review service in Wales<sup>13</sup> and the New Medicines Service in England.<sup>14</sup>

Discharge counselling is an important means of teaching patients about how to properly use their medications, and thereby improve their outcomes, reduce unnecessary readmission and reduce medicines wastage. During the counselling session, the pharmacist reviews with the patient what the medication is used for; how to properly take the medication; and potential side effects that may occur.

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<sup>13</sup> <http://www.wales.nhs.uk/news/20873>

<sup>14</sup> <http://www.nhs.uk/Video/Pages/new-medicines-service.aspx?searchtype=Tag&searchterm=About+the+NHS&>

Achieving efficiency in the health service also means making the best possible use of the skills and experience of all those who work in the health service. Some examples of how the skill mix could be improved in the Northern Ireland health service include:

- Enabling pharmacy to deliver vaccination services currently only provided in GP surgeries (e.g. winter flu). The Republic of Ireland has recently expanded the role of pharmacy in this area for the purposes of both patient convenience and health service efficiency<sup>15</sup>
- Better integration of GP and pharmacist intervention and prevention programmes to enhance professional trust, to improve the health of the population and provide better value for money
- In the context of making best use of professional resources in the health service, it makes sense that pharmacists, the most accessible healthcare provider, and the expert in medicines, take on expanded roles in such areas as prescribing. This means, for example:
  - Extending the scope of the Minor Ailments Scheme in community pharmacy, enabling pharmacists to prescribe prescription and over the counter medicines to treat minor conditions such as a rash, a cough in addition to the limited range of conditions already included in the scheme; or
  - Start, adjust, continue or discontinue a medication in collaboration with a doctor
  - Independent prescribing by pharmacists complements — not replaces — care provided by a doctor, and can mean more convenience, continuity of care and less time spent dealing with prescription changes. Greater use should be made of Independent Pharmacist Prescribers in primary and secondary care.

## 6. Conclusion

The Forum is hopeful that our comments are considered by the Northern Ireland Executive. We are happy to provide further comment if requested or to engage in any discussions on the issues we have raised. We look forward to seeing a final Programme for Government.

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<sup>15</sup> <http://www.thejournal.ie/cheaper-flu-vaccinations-on-their-way-at-pharmacies-257098-Oct2011/>

## The Rainbow Project



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22 February 2012

Programme for Government Team

Office of the First Minister & deputy First Minister

Room E3.19

Block E, Castle Buildings

Stormont Estate

Belfast

BT4 3SR

Dear Programme for Government Team,

**Re: Response to the Draft Programme for Government 2011-2015**

The Rainbow Project (TRP) welcomes the opportunity to respond to the Office of the First Minister and deputy First Minister Draft Programme for Government 2011-2015 (PfG).

The Rainbow Project is Northern Ireland's largest lesbian, gay, bisexual and transgendered (LGB&T) organisation; rights based, holistic and non-partisan. We provide services for LGB&T individuals including information and support, education and training, counselling, personal development courses, health promotion, advocacy, training, policy development as well as lobby at political and official level.

This is a brief response and will comment primarily on the Sexual Orientation Strategy and Action Plan, the Cohesion, Sharing and Integration Strategy and the need for a Transgender (gender identity) Strategy.

The rationale for this is that issues such as health, better community relations, educational inequalities and the like, for LGB and T people, can be incorporated into, and covered by these policy areas.

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A charity registered with the Inland Revenue No. XR17450

A company limited by guarantee No. NI30101 Rainbow Health Ltd

Registered company office: 9-13 Waring Street, Belfast BT1 2DX 2 | Page



## **Sexual Orientation Strategy and Action Plan**

We welcome the inclusion of a **'sexual orientation action plan' (page 35)** as a recognised 'building block' under *'Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing'*. Further we agree with the aim of this priority, namely to *'address the challenges of disadvantage and inequality that afflict society and to address the relatively poor health and long-term shorter life expectancy of our population; it's purpose is to stimulate interventions that break the cycle of deprivation, educational under achievement and to address health inequalities and poor health and well being, as well as economic disengagement.'*

However it is our view that OFMdfM should consider a number of issues on this point;

Firstly, Ministers have committed to publishing a 'Sexual Orientation **Strategy** and Action Plan', not just an action plan as stated in the document, and **we would recommend that this is acknowledged in the 'building blocks' under Priority 2; changing the term 'Sexual Orientation Action Plan' to 'Sexual Orientation Strategy and Action Plan.'** The strategy should outline the government's commitment to delivering for LGB people, what the current issues faced by LGB people are, what policy gaps and information short falls exist, what government's and department's responsibilities are and then be followed by an action plan to begin addressing those issues.

Secondly, while a Sexual Orientation Action Plan has been recognised as a key building block for Priority 2, it has subsequently been *excluded* from the 'key commitments' that are then outlined in the document under the same priority.

The Rainbow Project pressed OFMdfM to commit to publish a Sexual Orientation Strategy and Action Plan and Ministers then gave that commitment, and reaffirmed it several times, either in answers to Assembly Questions to MLA's or on the floor of the Assembly and we welcome this commitment.

The Rainbow Project also met with OFMdfM officials during the drafting stage of the PfG and stressed that there was a real need to have that commitment enshrined in the government's PfG, to enable government centrally and Departments individually, to focus their attention on delivering firm measures to address inequalities, areas of disadvantage better community relations and equality of outcome opportunities for the lesbian, gay and bisexual community.

It seems nonsensical that Ministers would commit to publishing a Sexual Orientation Strategy and Action Plan but then omit same from the key commitments from the PfG. **We would recommend that in line with Ministerial commitments, the publication of a Sexual Orientation Strategy and Action Plan is included as a key commitment under Priority 2 of the PfG.** Finally, It is the view of The Rainbow Project that the Sexual Orientation Strategy and Action Plan should also have been acknowledged in the PfG as building blocks from both *'Priority 3: Protecting Our People, the Environment and Creating Safer Communities'* and *'Priority 4: 3 | P a g e Building a Shared and Strong Community.'* It is disappointing that OFMdfM have omitted this work from these priorities. A comprehensive and inclusive Sexual Orientation Strategy and Action Plan will undoubtedly contribute to the achievement of these aims. **We would recommend that a Sexual Orientation Strategy and Action Plan is acknowledged in the key building blocks for Priority 3 and Priority 4 of the PfG.**

## **Cohesion, Sharing and Integration Strategy**

The Rainbow Project welcomes the commitment in the PfG to **'finalise the Cohesion, Sharing and Integration Strategy to build a united community and improve community relations'** as a **key government commitment (page 8).**

The LGB&T sector made various representations to government on the need to include issues faced by LGB&T people in the Cohesion, Sharing and Integration Strategy. We partnered with other organisations within the community and voluntary sector, namely Disability Action NI and Women's Aid Federation NI, to highlight the exclusion of LGBT issues, the exclusion of issues faced by people living with disabilities and the gender imbalance within the document and sought to have those

rectified. This remains The Rainbow Projects position on the Cohesion, Sharing and Integration Strategy.

We understand that significant progress is being made by the All Party Working Group on bringing forward proposals for a Cohesion, Sharing and Integration Strategy and we welcome that. In addition to the above comment on the need for the new document to reflect societal realities, we would stress the following;

**There needs to be full consultation on the new document**, in line with the equality obligations that the Northern Ireland Executive is bound by under Section 75 of the Northern Ireland Act 1998, particularly if the document will be significantly different to the previous.

Moreover, it is the view of The Rainbow Project that because this document is being produced by an All Party Working Group, that doesn't negate the fact that **the OFMdFM Committee must scrutinise the new Cohesion, Sharing and Integration Strategy**. It is their democratic obligation to scrutinise the strategy and organisations such as this one must be afforded the opportunity to make representations to that Committee about this document, should we so desire, and if permitted to by the Committee.

### **Transgender Strategy**

This PfG identifies the areas of work that the devolved government of Northern Ireland considers important, what they commit to addressing and how they intend to address them over the next five years. This is a programme that looks to the future, which talks of a better future.

We are therefore **deeply disappointed that there is no attempt made by this government to develop a transgender strategy and action plan within the next five years**. This is something that the London government has acknowledged as important, committed to doing, have produced and are advancing<sup>1</sup>. Issues often faced by people who identify as transgendered around education, employment and empowerment are often complex, acute and sensitive. **The Rainbow Project would recommend (and strongly urge) the inclusion of a commitment to develop and deliver an action plan to deliver transgender equality.**

<sup>1</sup> <http://www.homeoffice.gov.uk/equalities/lgbt/transgender-equality/>

This should be a dedicated stand alone strategy to which cross references the gender strategy and sexual orientation strategy where appropriate.

### **Conclusion**

We welcome the opportunity to respond to the Office of the First Minister and deputy First Minister Draft Programme for Government 2011-2015 (PfG).

We urge OFMdFM to publish within the PfG their commitment to publish a Sexual Orientation Strategy and Action Plan, and adequately reflect that commitment in the relevant priority sections of the programme. We urge openness and transparency on the production of the Cohesion, Sharing and Integration Strategy and reaffirm our views in same as per our response to the first consultation. Finally we are disappointed at the lack of, and would urge the government to produce, a strategy to advance transgender equality.

We are happy to meet with officials about any aspect of this response.

Regards

**Matthew McDermott**

EQUALITY OFFICER

## Woodland Trust

### PROGRAMME FOR GOVERNMENT – 2011-15 – CONSULTATION REPLY PROFORMA

<b>Name:</b>	<b>Lee Bruce</b>
<b>Organisation:</b>	<b>Woodland Trust</b>
<b>Contact Details:</b>	
<b>Question 1</b> 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. <i>(No more than 500 words)</i>	

**Question 1** From an environmental perspective the Programme for Government lacks both a compelling vision and a coherent set of measurable objectives. This incoherence is illuminated in Priority 3 of the Programme for Government, 'Protecting Our People, the Environment and Creating Safer Communities,' where the construction of a new Police, Prison and Fire Training College and the upgrade of the Coleraine to Derry road network is linked together with environmental concerns such as climate change mitigation and the production of a Biodiversity Strategy. There is limited benefit to be gained in linking the policies together in this manner – indeed the document offers little explanation as to why the Executive considers it necessary to marry these varied aspirations. Measures outlined for the Department of Justice and Department for Regional Development are without question important in their own right. However, tying these into a set of policies on environmental protection and enhancement threatens to create confusion when the Executive seeks to communicate the priorities of each Department. By framing the draft in this way the Executive also detracts from the responsibilities the Department of Environment and the Department of Agriculture and Rural Development have in acting as custodians of the natural world in Northern Ireland. The Programme for Government should be restructured to ensure that environmental concerns are dealt with coherently – it is noteworthy that forestry is missed out completely. This means bringing objectives such as protection, enhancement and expansion to the fore of Priority 3 and linking these to quantifiable targets. Highlighting the role woods and trees play in delivering on a variety of economic, social and environmental objectives would vastly improve the Programme for Government as would a roadmap with targets charting how the Executive will meet its commitment to double woodland cover in Northern Ireland. For example a recent Freedom of Information request commissioned by the Woodland Trust discovered that there was at least 10,870 hectares of land in public ownership that is currently maintained as grassland. The Department of Agriculture should therefore commission a study to ascertain how much of this could be planted with new woodland as a means of delivering on the Executive's long term ambition to double woodland cover. The building blocks quoted in Priority 3 should also be amended to include the following policies, legal frameworks and scientific research: *Northern Ireland Forestry, A Strategy for Sustainability and Growth* (2006), *The Sustainable Development Implementation Plan 2011*, *A Strategy to Develop the Recreational and Social Use of Our Forests* 2009, *The Forestry Act (Northern Ireland) 2010*, *the Planning Act (Northern Ireland) 2011*, *The Read Report* 2009 and the *National Ecosystems Assessment* 2011. These documents are crucial building blocks which would combine to help the Executive achieve its long-term aims in relation to woodland expansion, protection and restoration and access to natural green space. It is vital that the Executive uses the Programme for Government to restate its commitment to delivering pledges such as a doubling of woodland cover alongside their legal duties in regard to the desirability of maintaining ancient woodland.

## 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.

## Question 2

The Woodland Trust is concerned that the Programme for Government fails to reflect the full range of priorities to which the Executive is committed and therefore neglects to link commitments to a plan for delivery. As an example, the Programme for Government has no targets for woodland expansion and protection despite these actions being manifesto commitments and/or Executive priorities. In practice this means that it will be near impossible for the Executive, Assembly and public to measure progress in regard to the delivery of environmental pledges.

One striking example of this shortcoming is the omission of a target for woodland expansion. In 2006 the Executive committed to double woodland cover in 50 years and both Sinn Fein (who now hold the forestry brief through Minister Michelle O'Neill) and the Alliance Party pledged to deliver on this priority at the last election. The DUP also pledged to increase the amount of native woodland and protect and restore ancient woods. Despite these election pledges there are no measurable targets pertaining to woods and trees.

Alarming the Forest Service halved the Executive's tree planting commitment after the Assembly election. At the proposed rate of tree planting it would take 400 hundred years to double woodland cover in Northern Ireland. The Programme for Government should offer a detailed narrative on how to reverse the long term decline in tree planting, from 800 hectares in the year 2000 to 300 hectares in 2011, as the current rate of expansion will not achieve the Executive's vision articulated in *Northern Ireland Forestry, A Strategy for Sustainability and Growth* .

The Programme for Government also neglects the protection of ancient and long-established woodlands, an irreplaceable habitat and Northern Ireland's equivalent of the rainforest. This despite the Forestry Act 2010 furnishing a legislative duty on the Department of Agriculture to ensure that the new felling licence regime recognise the desirability to protect the special character of ancient woodland. The Act also afforded the Department of Agriculture with a legal duty to recognise the value of woodland in mitigating and adapting to climate change, supporting biodiversity and developing a resource for recreation. None of this is included in the draft Programme for Government which is surprising as the Executive has legal standards that it is expected to adhere to.

Quite simply the Programme for Government needs to do more to reflect the vital role woods and trees play in delivering the ecosystems services that the economy and society depend upon.

**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.

**Question 3** The commitments in the Programme for Government do not reflect in any meaningful way the contribution of woods and trees in delivering on environmental, economic and social priorities. In a tough spending climate woods and trees provide genuine and lasting value for money by, for example, providing employment through the forestry industry, supporting productive agriculture, enhancing air quality, helping manage water flow and quality and providing natural green space for people to enjoy. None of this is reflected in the Programme for Government at present.

At the Trust we believe the following commitments should be included in the Programme for Government to provide measurable targets against which environmental ambitions can be progressed:

- a.) An ambitious tree planting target of 1740 hectares per annum to deliver on the commitment to double woodland cover in 50 years.
- b.) Meaningful protection of ancient woodland. This can be achieved by fashioning the felling licence regime in a manner that helps avoid any further loss in the area of ancient and long-established woodland.
- c.) All Planted Ancient Woodland Sites in public ownership should be entered into a programme of sensitive restoration over the 2011-2015 period. Sensitive restoration of those damaged ancient woods in State ownership is one of the most important improvements the Forest Service could deliver for nature conservation in Northern Ireland. There should also be incentives and guidance to encourage the restoration of ancient woods in private ownership.
- d.) Ensure that all staff at the Department of Agriculture and Rural Development are promoting forestry as a viable land management option under the Rural Development Programme.
- e.) Enable a timely implementation of the powers in the Planning Act 2011 which empower all local councils to generate and operate databases of all trees protected by a Tree Preservation Order.
- f.) Include the Woodland Access Standard within the Programme for Government as a tool for measuring people's access to woods and trees. The Standard which is based on wide ranging research and surveys of public opinion aspires:
  - 1.) That no person should live more than 500m from at least one area of accessible woodland of no less than 2 hectares in size.
  - 2.) That there should be at least one area of accessible woodland of no less than 20 hectares within 4km (8km roundtrip) of people's homes.

**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.

**Question 4** No comment.

**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.

**Question 5** In its current form the Programme for Government has been unsuccessful in its attempts to balance all major sectoral issues. This point is demonstrated by the failure to identify any of the opportunities or challenges facing the forestry sector. There is no recognition of the role forestry has in supporting economic objectives through employment within the timber industry, cost effective carbon abatement, aiding productive farming, supporting tourist opportunities at sites such as the Faughan Valley in Londonderry and enhancing public health through the provision of accessible green spaces. In June 2011, the National Ecosystems Assessment noted that: 'Woodlands provide the highest identified number of ecosystems services including regulating climate, air quality and water flows, providing timber and other wood products as well as a range of cultural benefits'. These benefits should be reflected in the Programme for Government.

Addressing this is crucial to ensure balance in the Programme for Government. There should be a range of indicators for the forestry sector to work towards achieving in partnership with the Executive (see suggestions in response to Question 3), as woods and trees are tools for delivering on the indicators relating to tourism, public health and economic development.

**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** No comment.

**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**

We are concerned that certain departments in the Executive may have undermined due process by publishing their own policy targets before the Executive had written the Programme for Government. In the months before the Programme for Government was published, the Forest Service, an agency of the Department of Agricultural and Rural Development, published their Business Plan which included a dramatic reduction in the woodland expansion target. This decision not only undermines the credibility of the consultation process in relation to the Programme for Government, it also contradicts the commitment given by the Minister for Agriculture through her Party's manifesto to double woodland cover. It is worth noting that this commitment was recently reiterated in written responses to members of the Assembly.

At the Trust we believe the Minister should review her woodland expansion target to ensure that it delivers on her Party's pledge to double the forest area in Northern Ireland. The legislative duties identified in the Forestry Act, and for which the Department for Agriculture now has a statutory obligation to deliver, must also be used to progress the work plan for Forest Service. Unless the PfG furnishes detailed targets it will be impossible for politicians to scrutinise the performance of the Executive.

## Thomas-Howard Jenkins G

Dear First Minister/deputy First Minister

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 G Thomas-Howard Jenkins



## Thompson C

Dear Sirs,

I am delighted to note that the Draft Programme for Government has included a target that by 2015 at least 36% of primary school pupils and 22% of secondary school pupils walk or cycle to school as their main mode of transport. I trust this will be included in the final Programme for Government and the Executive allocates sufficient investment to enable the target to be reached.

I should be grateful if you would take account of my views.

Regards,

C Thompson

## Thorley G

16 January 2012

Mr Malcolm McKibbin

Head of Civil Service

Stormont Castle

Stormont

Belfast

BT4 3TT

Dear Malcolm

When we last met I offered to comment on the following three documents:

- The Draft Programme for Government 2011- 2015
- The Economic Strategy 2011– 2014/15
- The Draft Investment Strategy 2011- 2021

These documents represent a powerful statement of the NI Executive's ambitious plans and priorities and I believe they are unique in both the UK and devolved administrations' context. So well done Team NI!

In reading these documents I was struck by the challenge that both politicians and civil servants have faced in presenting strategic documents that need to both outline what I would describe as Government level objectives and plans as well as indicate some quite local investments. Because the NI Executive is responsible for the delivery of a whole range of services normally the province of Local Government elsewhere in the UK, the above documents reminded me of the kind of documents I was involved in during my time at Strathclyde Regional Council (an organisation that spent £2.5 billion/annum employing over 100,000 people). I must admit we all thought at that time that we were very big and very smart as an organisation and we believed that if we focused our thinking on a few big issues and mobilised our many services accordingly, we could really make a positive and step change for the benefit of our population. Over the 20 years of its existence I think that Strathclyde, because it thought and operated in this way, did make a considerable difference to the economy and the social well-being of its residents. It was beyond our imagination however to envisage operating an organisation like the NI Executive that is four times bigger in terms of funding; has full legislative powers and is also responsible for the delivery of all major public services. It is this combination I believe that makes NI Executive context so potentially powerful.

The NI Executive embracing as it does all of the above makes it unique in a UK context. It is this uniqueness; its ability to allocate funds; to legislate and to deliver that potentially makes the situation in Northern Ireland so exciting.

That would be my first major comment. It is the scope of the NI public sector that represents a unique selling point that I would major on in any editing of the Programme for Government. It is a UK level, unique selling point. There is a hint of a recognition of this on Page 7 of the Investment Strategy where it says “we can act together, comment quickly, be responsive to the needs of the economy”. However, I think this comment does not give justice to the importance of this asset to both potential investors and the local population. It is the combination of clear thinking; clear strategy; legislative capability; funding allocation **and** delivery that in my view makes this such a powerful asset brimful with potential.

There is a second important follow through on this point and this is the ability you have as the Head of the NI Civil Service to mobilise all public sector employees in the delivery of the NI Executive’s five overarching priorities.

I fully understand that each Permanent Secretary has a direct accountability line to a Minister and then from each Minister to the NI Assembly, but as the Programme for Government mentions (Page 27) “departments must work together.” In Scotland we work extraordinarily hard to weld Local Government and the Health Service together to achieve fairly obvious and straight forward objectives. But we have limited success in this area mainly because the Health Service operates to Government level objectives and Local Government operates to local objectives. The more outrageous of us in Scotland advocate the merger of local government and health to form a new level of government in Scotland in an effort to help refocus on the needs of the population however in NI you are already there in terms of single ownership and control of education; health and social work; further and higher education; housing; economic development and transport; water and sewerage. From my external perspective and notwithstanding the plans to reorganise and enhance local government’s role in Northern Ireland, it is your present capability to co-ordinate and drive delivery across the entire public sector that gives the NI Executive a crucial unique selling point. If I were redrafting the Programme for Government rather than as is said on page 27 “all departments must work together” I would say something like “it is our ambition to operate the most effective public sector service delivery in the UK where we will focus on the delivery of agreed outcomes. Departmental and organisational boundaries in the public sector are of secondary importance in achieving these outcomes.”

So far I believe that we have the following unique selling points:

- To think, plan and deliver holistically across the NI public sector
- The power to create/alter legislation in Northern Ireland
- The ability to allocate around £50 +billion over the next five years
- The ability to respond quickly to emerging issues

When we add in the following existing strengths:

- A very well educated young population
- A very high quality natural environment
- Successful agri/food and tourism businesses
- Headline major companies in leading sectors
- Cutting edge telecoms connectivity
- A successful track record in public sector delivery over the past 5 years
- A joint political determination to look forward and to succeed

Then you can see why I use a very non Civil Service term of “being excited.”

I would put all of the above at the beginning of the Draft Programme for Government so that the reader is immediately enthused over the NI Executive’s ambition and also given confidence that the local public sector organisations will focus and deliver on these ambitions.

A second thought in scanning the Draft Programme; Economic Strategy and the Draft Investment Strategy is that whilst the NI Executive’s economic ambitions have been clearly spelled out in the Economic Strategy and well reflected in the other two documents, I wondered if there had been discussion of formulating a Social Strategy that not only brigades the 18 strategies, plans and actions (as outlined in priority 2 of the Draft Programme for Government) but in the same way as the Economic Strategy outlines the thinking behind these strategies and the way in which each of them fits in and contributes to overall outcomes for tackling deprivation, disadvantage and inequality? It may well be that the NI Executive believe that the primary route for tackling deep-seated social issues is through a robust and effective economic strategy and as an instinctive enthusiast for economic development I have enormous sympathy for this view. However articulating a Social Strategy would give space for discussing how these eighteen Strategies and their corresponding capital and revenue streams will work together in helping to meet the NI’s deprivation, disadvantage and inequality objectives.

Thanks again for the opportunity to comment and as ever I would be happy to further discuss with you or your colleagues.

Yours sincerely

G Thorley

IBM Department of the OFMDFM

# Traditional Unionist Voice (TUV)

## **Traditional Unionist Voice Response to the draft Programme for Government**

### **Job creation**

TUV notes that the first commitment of the Northern Ireland executive is to “**support the promotion of over 25,000 new jobs**”.

This “commitment” should be treated with a great deal of caution. By way of Assembly questions TUV leader Jim Allister has established that though Invest NI claims to have promoted 24,612 jobs in Northern Ireland in the 5 years, 2006-11, it cannot say how many of those jobs actually came into existence and of those which did, how many of them still exist.

It is fundamental to any audit of the executive’s performance to know not just how many jobs it ‘promoted’ but how many actually came into existence and survived.

If we progress down the same route as before – and are unable to say how many jobs come in to existence or last for any significant period of time – the Executive’s top priority on job promotion (as distinct from creation) is completely untestable and therefore meaningless.

In a paper produced for the Employment and Learning Committee Eoin Murphy makes the following important point:

“promoting” jobs does not necessarily mean “creating” jobs. In the DETI PSA1 Technical notes it is stated that job promotions *are jobs expected to be created by a particular project*

“Indeed as stated by the Independent Review of Economic Policy (IREP) report:  
*Not all promoted jobs are actually created. A few projects fail to materialise at all and others for various reasons created fewer jobs than anticipated at the time of offer.*

“The IREP goes on to state that of the jobs *promoted* between 2002/03 and 2004/5, only 82% were created.”

**TUV believes that the Executive should measure job creation and the longevity of those jobs which do materialise so as to maximise public confidence that InvestNI’s substantial budget is being put to good use.**

Secondly, TUV takes serious issue with the Belfast and Londonderry bias in the creation of jobs.

We note that on page 23 of the PfG the executive states:

“We will ensure that all sub-regions are able to grow and prosper **whilst recognising the importance of Belfast and Derry/ Londonderry as key drivers of regional economic growth**”.

We believe that this statement reflects the urban bias (and particularly the Belfast / Londonderry bias) of the PfG when it comes to job promotion. **Ballymena has the highest economic inactivity rate in Northern Ireland at 38%**. This is far in excess of that of Londonderry (32.8%) or Belfast (29.5%) (figures from 2010 labour Force Survey).

This reflects the Executive's longstanding neglect of rural areas generally and North Antrim in particular.

In answer to an Assembly question tabled by TUV leader Jim Allister it was revealed that **for 4 years, from 2006-2010, not a single foreign investor was introduced to North Antrim, though over the same period 805 visits had been arranged to other parts of Northern Ireland.** It was only in 2010/11 that for the first time in 5 years that Invest NI brought a foreign investor to visit North Antrim, when 2 visits took place out of a total of 181 across Northern Ireland.

The constituency of the First Minister had 47. Indeed of the total visits over 5 years, two thirds went to Belfast. Even when Ian Paisley was First Minister North Antrim didn't have a single potential foreign investor come to see what the constituency had to offer.

In view of these facts it is little wonder that in terms of the jobs InvestNI claims to have created over the same five year period just **680 of them were in North Antrim while East Belfast got 3392.**

### **Greater Commitment to Tackling Youth Unemployment Required**

While the desire to support those (particularly the young) gaining employment by providing skills and training is a laudable aim TUV questions how genuine the Executive's commitment to this is when a worthwhile initiative like the Steps Ahead programme has to pause recruitment.

The Department of Employment and Learning introduced the Steps to Work programme in September 2008 with the aim of assisting people who are unemployed or economically inactive to find work. Step Ahead is an employment initiative within the programme and provided six month employment within the voluntary or community sector for those on benefits for 30 months or more.

When the programme was paused DEL acknowledged that demand placed on the programme has grown because of the "**unprecedented increase in unemployment levels over recent years**".

**TUV was therefore shocked to learn that DEL's bid for an additional £9.2m in order to meet the shortfall and maintain Steps to Work provision, including the Step Ahead strand at current levels was not fully met, leaving a projected shortfall of over £4.7m.**

**The fact that Stormont can find £5 million a year to fund spin doctors yet cannot find £4.7m to keep a successful employment initiative going will shock many people. TUV believes that the needs of ordinary people should come before Stormont's propaganda machine.**

### **Corporation Tax**

**TUV opposes the devolution of corporation tax to Northern Ireland.** According to our own Department of Finance and Personnel Northern Ireland had **a fiscal deficit of £7.3bn in 2007 – 08** and should therefore be very cautious about tampering with fiscal lifelines with the rest of the UK.

### **Loan Fund**

The Executive states that it will “aid liquidity of Small and Medium Size Enterprises through a £50 million loan fund”.

TUV is concerned that the interest rates attached to the loans may be such as to nullify the benefit of the scheme.

**It is clear from an Assembly answer by DETI that very high interest will be charged, because risk will be the driving force. Thus, small businesses getting a raw deal from the banks may find they do no better under this scheme, which rather defeats its purpose.**

### **Funding to Sport**

TUV notes the commitment to “develop sports stadiums as agreed with the IFA, GAA and Ulster Rugby”.

**TUV would like to see a more balanced distribution of funding to sports in Northern Ireland.** As a result of an Assembly Question our party leader discovered that clubs affiliated to the Irish Football Association and IRFU receive only a fraction of the government funding allocated to GAA clubs.

Over the last five years GAA clubs have received almost £18 million of tax payer’s money while clubs affiliated with the Irish Football Association have received under £8.5 million. Clubs affiliated to the Irish Rugby Football Union received a mere £708,187 over same period.

Now on stadium provision the GAA is going to get as much as football and rugby put together.

TUV believes that this is manifestly unfair to other sports, particularly as the GAA is an unapologetically Republican organisation.

### **Education and Skills Authority**

TUV rejects the proposed Education and Skills Authority (ESA) as we believe that it will have disastrous consequences for education in our Province. Power will be concentrated in the hands of those who have driven the anti-transfer and anti-academic agenda.

Other Unionists have previously branded ESA as “bureaucratic” and an invention to satisfy “the control freakery” of the Sinn Fein department. Northern Ireland was promised that it wasn’t coming back yet under this PfG ESA will be operational in 2013.

**TUV believes the interests of children should be put before Sinn Fein dogma. We do not believe that our children's future should be part of a political trade off.** Therefore TUV maintains its longstanding opposition to ESA.

### **Energy**

TUV notes that the PfG aims to “encourage industry to achieve 20% of electricity consumption from renewable electricity and 4% renewable heat by 2015”.

In DETI's *Energy A Strategic Framework for Northern Ireland* published in September 2010 the department set a target to achieve 40% of Northern Ireland's electricity consumption from renewable sources by 2020.

At the time TUV responded to the consultation pointing out that 10% of our electricity comes from renewable resources and to suggest that this could be quadrupled in 10 years was fantasy.

TUV is concerned about the cost implications on hard pressed industry at a time of economic uncertainty. **The key concern of the Department should be to get the cost of electricity down**, not targets relating to renewables.

Via Assembly Questions TUV leader Jim Allister has established that customers in Northern Ireland pay more than any other parts of the United Kingdom for their electricity. It was confirmed by the DETI Minister that “**there was a trend towards convergence (in NI/GB prices) in the period immediately prior to the introduction of the Single Electricity Market (SEM). However, in the post-SEM period, there has been a divergence once again.**” It was also revealed that since 2008, domestic electricity prices have generally been lower in Northern Ireland than in the Republic. Now, however, we are heading towards closing that gap.

**TUV believes that it would make good economic sense for Northern Ireland's electricity customers to strengthen our ties with the GB market rather than binding ourselves ever closer to the Irish Republic when it comes to electricity generation.**

### **Maze Shrine**

TUV opposes what the PfG describes as the “regeneration” of the Maze. As Nigel Dodds memorably warned: “However it is dressed up, whatever spin is deployed, the preservation of a section of the H-Blocks – including the hospital wing – would become a shrine to the terrorists”.

The tragic thing is that **the site of the Maze Prison has potential to become a jewel in the crown of our economy being on the outskirts of two of Northern Ireland's major population centres – the cities of Lisburn and Belfast –, right beside the M1 and close to both major airports.**

**TUV advocates (i) the delisting and demolition of the H-Blocks and hospital wing and (ii) the development of the site in consultation with local industry and business so as to maximise the economic potential of the site for the benefit of the people of Lisburn and indeed all of Northern Ireland.**



If Northern Ireland is to have a “conflict transformation centre” – and TUV is sceptical about the merits of any such centre – it should not be blighted and tainted by being on the site of the Maze prison.

## A5

TUV notes that the Draft Investment Strategy contains a footnote on page 14 stating that the Executive relating to the decision on the A5.

The announcement by Sammy Wilson on 14<sup>th</sup> February that a large chunk of the A5 will be built for the Republic illustrates that what Sinn Fein/IRA demands they get.

Just three months ago the Republic withdrew funding (**something which TUV had repeatedly predicted and which was stated in our response to the last Programme for Government**) and Minister Wilson said that “the road cannot be funded”.

TUV would repeat a question put to the DFP Minister on 14<sup>th</sup> February on the floor of the Assembly which was not answered – **where is the Business Case for the A5 project which has been approved or is due process trumped by political expediency?**

It is important to note that other projects such as the A26 duelling should be getting approval because it meets the traffic volume criteria where the A5 does not.

## Culture

TUV notes the PfG’s commitment to provide financial and other support to “ensure the success of the Derry/Londonderry [*sic*] City of Culture 2013”.

**TUV questions why the PfG never refers to Londonderry as the UK City of Culture 2013.** By doing so the PfG plays to a Republican agenda of stripping the celebrations of 2013 of anything associated with the United Kingdom. This is deeply disappointing as 2013 could have allowed the beleaguered minority community of Londonderry to feel part of a city which many feel increasingly does not have space for anything which is not Irish and Nationalist.

**TUV believes that the PfG should be rewritten to include the preface UK to each reference to the City of Culture.**

TUV notes that the executive will provide support across government to ensure the success of the Northern Ireland Tourist Board’s Our Time, Our Place initiative and the centenary of the Titanic’s maiden voyage.

We are appalled that neither centenary of the Ulster Covenant nor the Diamond Jubilee of Her Majesty Queen Elizabeth II merit a mention in the PfG.

In reply to a Written Question from Jim Allister the Minister for Culture, Arts and Leisure has stated that no funding is available for groups wishing to mark the coronation of HM the Queen.

**We believe that the executive should provide funding for the celebration of the centenary of the Ulster Covenant and the Diamond Jubilee of Her Majesty Queen Elizabeth II.**

TUV believe that among the things which the Executive could do would be **an advertising campaign to promote awareness of the archive of the Ulster Unionist Council, held by the Public Record Office (PRONI) which contains the original signatures and addresses of the men who signed the Ulster Covenant and of the women who signed the parallel Declaration.**

We also believe that funding should be made available to provide exhibitions explaining what happened on 28<sup>th</sup> September 1912 in local areas.

Stormont could mark the centenary of the signing of Northern Ireland's birthright by placing **back on public display the table on which the Royal Assent to the Act of Union between Great Britain and Ireland was signed and displaying the portrait of Lord Craigavon who played a pivotal role in organising the Covenant.**

Additionally, TUV believes that **the Department of Education should provide a small memento to all school children in Northern Ireland marking the Diamond Jubilee.** In addition, the Assembly should **request the return of the portrait of Her Majesty the Queen which is currently on loan to Hillsborough Castle and place it on display prominently in Stormont.**

#### **Social Investment Fund**

TUV has grave reservations about the Social Investment Fund. This fund should have been administered through the Department of Social Development and there is no justification for it being within OFMdFM. Additionally, the trumpeting of the scheme as one which would make a real difference to local communities is hard to accept when **we remember that (as of September 2011 when TUV leader Jim Allister raised the issue - some six months after the fund was announced in a blaze of publicity) not a single penny had been spent.**

#### **Nursery provision**

TUV believes that it is important that young mothers are able to remain in employment should they wish and therefore a commitment to affordable childcare is welcome if it delivers that aim. **Currently provision of nursery places is very unevenly spread in Northern Ireland with over provision in some areas and others having none at all. It is vital that places are not just there but that they are in the areas where they are needed.**

#### **Reform of Government Structures**

TUV notes the PfG's commitment to agree changes to post 2015 structures of Government in 2012. It would appear that the only change intended is to abolish the Department of Employment and Learning.

Three points need to be made in relation to the proposed abolition of DEL:

- 1) **How can the people of Northern Ireland have confidence that the Draft PfG is a coherent and well thought out document if between the time when it is put out**

**for consultation and the close of the consultation period it is announced that a government department will disappear?**

- 2) The suggestion that the Sinn Fein controlled Department of Education will take over responsibility for our universities will inspire little confidence in those who have seen the assault it has brought to our Grammar Schools.
- 3) Stormont is in need of root and branch reform, not just a cosmetic exercise of removing one government department.

The present arrangements, centred on mandatory coalition, have abjectly failed and are incapable of ever producing good government. For any system to work and give durable and workable government it must respect **the fundamental democratic imperatives of the electorate being permitted to change their government - which mandatory coalition denies - and being permitted to have within the Assembly an Official Opposition.**

The 1998 Act needs to be radically amended so that after each election those parties who can agree a programme for government and command the requisite majority in the Assembly, form the government, and those who cannot fulfil the vital role of Opposition. **In consequence the filling of ministerial posts by D'Hondt should be abandoned.**

Additionally, TUV believes that:

- **The office of the joint First Ministers should be dissolved as it has proven to be a dysfunctional disaster.**
- **The number of government departments should be radically reduced to in or about six.**
- **The number of MLAs should be cut by at least a third.**

#### **Cohesion, Sharing and Integration**

TUV has a number of concerns about the Cohesion, Sharing and Integration Strategy which we detailed in our response to the consultation on the CSIS.

**TUV was astounded that the draft CSIS did not contain one word of recognition of the contribution which nurturing the traditional family unit can make to a cohesive society while at the same time committing the executive to the publication of a sexual orientation strategy.**

TUV saw potential dangers in the loose language which characterises much of the draft document. While on the face of it no one could take issue with the statements like “it is recognised that a cohesive society is one in which everyone can live, work and socialise together free from intimidation and prejudice in the context of the fairness, equality, rights, respect and responsibility” (1.7) TUV believes there could be dangers in how these words are twisted by interest groups. For example, the Belfast Agreement stated that everyone has “the right to live free from sectarian harassment” - a phrase which was almost repeated word for word in the consultation document (5.2). TUV wholeheartedly agrees with this laudable objective. However, the phrase has been twisted by sectarian “residents’ groups” and

Republicans in order to justify their efforts to ethically cleanse areas of any form of cultural expression which is not Irish and Republican.

**We strongly believe that respect for the Unionist/Protestant marching tradition is a key indicator of whether or not this country is genuinely moving forward.**

### **A More Open Government**

TUV notes the PfG's goal of improving online access to government services. Equally we note the absence of any commitment to a more open form of government. TUV believes that Northern Ireland departments – particularly OFMdfM – need to be more transparent. **Fulfilling their obligations under the Freedom of Information Act should be a key priority so that public confidence can be maximized.**

### **North/South vs East/West Imbalance**

TUV notes that the draft PfG rightly identifies economic recovery as the greatest challenge facing Northern Ireland. However, there is nothing in the draft PfG to suggest that the Executive will seek to run down its links with the bankrupt Irish Republic and instead strengthen our links with the much stronger economy of Great Britain.

The imbalance was highlighted by a written answer received by the TUV leader which stated that the **Northern Ireland Executive contributed £685,233 to the North South Ministerial Council in 2009 and a staggering £1,142,223 in 2010.**

**Contrast that with the derisory funding received by the British-Irish Council. The indicative running costs of the Secretariat are £170,000 per annum of which Northern Ireland's share will be £15,300.**

Thus in spite of the fact that the BIC has eight member administrations expenditure will be almost 15 times less than on the North-South Ministerial Council in 2010.

The British-Irish Council is very much the poor relation of the North-South Ministerial Council having been starved of funds. How can anyone claim there is a balance between the two when the difference between their budgets is so vast? **A Northern Ireland Executive which spends almost 75 times more on the NSMC than it does on the BIC is not one which is delivering for Unionism.**

**TUV believes that this imbalance needs to be addressed.**

### **Higher Education and the Future of Stranmillis**

TUV notes that one of the Executive's "building blocks" for growing a sustainable economy and investing in the future is the Higher Education Strategy.

TUV believes that there is a **need for affirmative action by the Executive to address the underrepresentation of Protestants in our Universities.**

Closely linked to this is the **need to preserve Stranmillis as an independent college for teacher training.** The DEL Minister's intention to starve the college of funds – something

which was evident from his statement to the Assembly on 28<sup>th</sup> November last year must be resisted.

### **Irish Language Strategy**

**TUV strongly opposes the commitment to an Irish Language Strategy as it is wasteful and its sole purpose would be to allow the Sinn Fein controlled Department of Culture, Arts and Leisure to dilute the Britishness of Northern Ireland.** We suspect that the commitment for a strategy for Ulster Scots Language, Heritage and Culture is little more than window dressing to suggest there is balance when in actual fact there is none.

**We regret that there is no suggestion that the funding imbalance between the Ulster Scots Agency and its counterpart Foras na Gaeilge is not mentioned.**

As a result of an Assembly Question TUV leader Jim Allister discovered that in the 11 years since their establishment the **Ulster Scots Agency has received just £16.45 million while Foras na Gaeilge has received £35.25 million.**

### **Prison Service Reform**

TUV notes that in the period covered by the Draft PfG there is a plan to “reform and modernise the Prison Service”.

TUV have exposed a number of issues since coming to Stormont which give us cause for concern about just what is going on inside our prisons. These included:

**Since 2007 there have been 682 adjudications which found prisoners guilty of criminal damage but only 40 cases where there was any referral for prosecution.** Amazingly the Minister was unable to quantify the cost of the damage caused or say how many of the referrals actually resulted in prosecutions or the outcome thereof;

**There were six hostage incidents in Northern Ireland’s prisons in just four months** and **There have been a total of 4,411 security alerts** in our prisons over the last five years. These included **38 cell wrecks in Maghaberry in 2010** and **over 700 drug related incidents in Magilligan in the last five years.**

Given these stark facts TUV is **appalled that the Minister seemed to be most preoccupied with stripping HM’s Prison Service in Northern Ireland of all the symbols of Britishness.** We are thankful that this threat seems to have diminished thanks to our leader’s exposure of the plan.

### **Compton Report**

We note that the Health and Social Care Reform Programme is cited in the PfG as one of the Executive’s “building blocks” for delivering “high quality and efficient public service”.

**TUV does not believe that the Compton Report can deliver this. Causeway Hospital is essential when it comes to the provision of acute health services in North Antrim and indeed East Londonderry where it is situated.**

Causeway has been run down over many years and it would seem that the Compton proposals will see it further downgraded. The people of North Antrim will not see this as part of

delivering a “high quality and efficient public service” – particularly when we recently saw that Antrim is unable to cope even with the current set up!

**TUV notes the absence of any commitment in the PfG on waiting list times.** A solid commitment in this regard would at least suggest that the Executive had some faith in Compton’s ability to deliver the “high quality and efficient public service” the PfG claims to aspire to.

#### **Meeting PfG Targets**

However, we further note that **1/3 of the targets set in the Executive’s last PfG were not met and that of Key Goals and Commitments almost half (44%) were not achieved.**

TUV believes that in future such failures should be explained on the floor of the Assembly and not, as was the case last week, be slipped out by way of a written statement on the same day as a major announcement by the Executive (i.e. approval for the A5 project).

## Training for Women Network

22 February 2012

Programme for Government Team

Office of the First Minister and deputy First Minister

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Belfast

BT4 3SR

Dear Sir/Madam

### **RE: TWN RESPONSE TO NORTHERN IRELAND EXECUTIVE DRAFT PROGRAMME FOR GOVERNMENT 2011-15**

Thank you for the opportunity to respond to the above consultation document. TWN always welcomes the opportunity to contribute to policy development as a constituent part of participative democracy.

TWN is a network of organisations and individuals working towards the empowerment of women in Northern Ireland through practical measures such as training, development, engagement with policy processes, events and research. TWN is also a cross-community organisation that promotes peace and reconciliation in the post-conflict context of Northern Ireland through the administration of projects under the PEACE III Programme focussing on promoting cross-community work and research.

On the subject of gender, the consultation document does not accord with the requirements of gender mainstreaming, that is, the recognition that policies have differential impacts on men and women and the instigation of specific measures to alleviate these differences. The document

does not mention women or the specific barriers to women's participation. In fact the word 'gender' is only mentioned once and 'women' not at all.

We wish to alert you to concerns highlighted by the Equality Commission for Northern Ireland 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 Executive in compliance with its statutory obligations under Section 75 of the Northern Ireland Act 1998, in line with the Commission's power to give advice to public authorities, as per Schedule 9 (1) (b) of the Northern Ireland Act 1998. Therefore TWN recommends the practice of gender budgeting, that is, the recognition of differential impacts of finance allocation as far as they affect men and women, with adjustments made to distribute funds more equitably.

In terms of the Equality Impact Assessment (EQIA) of the Programme for Government 2011-2015, TWN would like to express our concern over the extremely restricted timeframe the consultation period for this. We received a letter informing us of the consultation on the EQIA of the Programme for Government 2011-2015 on 13 January 2012 which would run for a period of 12 weeks but requesting responses for the consultation to be received by 22 February 2012. The reason given would suggest that if a response to the EQIA is to have an impact it must be received by 22 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.

I have attached a brief Gender-proofing Checklist developed by TWN to match against policy proposals to test for gender equality. I hope you find these comments helpful and if you require any further input, please do not hesitate to contact me.

Yours faithfully

**JOHN MOONEY**

Policy and Research Officer

Training for Women Network





## TW N GENDER-PROOFING CHECKLIST

TW N is a consultee under the provisions of Section 75 of the Northern Ireland Act 1998, which is to assess the impact of policy on specific groups regarding equality. TW N comments on policy development in the area of equality between men and women, while contributing to consultations in other areas. With regard to gender issues, the following are key points of policy the absence of which indicates a disadvantage to women.

- Women bear the main responsibility for childcare: Any policy that does not include the provision of childcare disadvantages women in terms of participation
- Women bear the main responsibility for other caring roles, such as elder care and care of disabled family members: Any policy that does not include provisions for respite care arrangements or arrangements for temporary care of family members disadvantages women in terms of participation
- Women bear the main responsibility for the care and administration of domestic life: Any policy that does not incorporate some form of flexible working enabling participation that is responsive to personal circumstances disadvantages women
- Men tend to be given priority in the allocation of household resources, including means of transport: Any policy that does not ensure sufficient transport arrangements, particularly in rural areas, excludes women
- Statistics indicate that women constitute the larger proportion of older people in society, the ratio increasing the greater the age: Any policy that disadvantages older people not only constitutes age discrimination, but also gender discrimination
- Many areas of policy development include some form of consultation or advisory body or forum: Any body that does not have a significant proportion of women, with sufficient financial support, does not represent the interests of women
- Consultation processes are often restricted to a policy document available for comment: Any consultation process that does not take steps to sufficiently access the opinions of women does not represent women's views
- Women constitute more than half of the population, which includes constituting more than half of other disadvantaged groups, indicating multiple disadvantage for women in those groups: Any policy or legislation that subsumes the category of 'women' into other categories or generalisations or does not gender-proof each individual group ignores the multiple disadvantages women experience and therefore discriminates against women

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## **Trócaire's consultation response to the Draft Programme for Government 2011-15**

### **Introduction**

Trócaire is a registered charity in the UK and Ireland and the official overseas development agency of the Catholic Church across the island of Ireland. Trócaire works for a just and sustainable world for all. We support communities in the developing world in their efforts to improve their lives, meet their basic needs and ensure their human dignity. We reaffirm our objective to eradicate poverty and achieve social justice, including environmental justice.

Trócaire welcomes the opportunity to respond to the public consultation on the Draft Programme for Government 2011-15. More specifically, the opportunity to provide input on 'Priority 3: Protecting our people, the environment and creating safer communities'.

Trócaire recognises that action on climate change remains a priority for the Executive, and welcomes its inclusion in the Draft Programme for Government. However, we regret that so far there is neither a commitment to review existing emission reduction targets, nor a commitment to introduce structures or mechanisms to enable and ensure targets made are achieved.

Trócaire's response to the Draft Programme for Government sets out the rationale for the Office of the First Minister and Deputy First Minister (OFMDFM) to revise the draft document to include a series of more robust commitments on climate change, and the enabling of a local Climate Change Act.

Trócaire also wishes to take this opportunity to urge OFMDFM to include a commitment in the Programme for Government to incorporate the findings and recommendations from the All Party Group on International Development's report, 'International Development Strategy for Northern Ireland'<sup>1</sup> into the Executive's International Relations Strategy.

### **Trócaire's global work on climate change**

Trócaire is working every day with individuals and communities across the world whose lives and livelihoods are being eroded by current climate variability, and devastated by increasingly frequent and intense climate shocks such as droughts, storms and floods. According to the Fourth Assessment Report of the Intergovernmental Panel on Climate

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<sup>1</sup> All Party Group on International Development (2011), 'International Development Strategy for Northern Ireland' <http://www.scribd.com/doc/60094872/Northern-Ireland-Assembly-International-Development-Strategy>

Change these impacts are set to increase and may do so dramatically unless action is taken to reign in and reduce global emissions. The interaction between climate change and poverty is potentially catastrophic as climate change pushes what are already fragile livelihoods over the edge. In order to tackle poverty it is necessary to tackle climate change. This means addressing both the causes and the consequences of climate change.

It is the people around the world who have contributed least to climate change who are being disproportionately affected by its impacts. Climate change threatens to cement global inequities and for Trócaire it presents one of the defining justice issues of our time.

Since 2008 Trócaire has been campaigning for national and international legislation to curb the threat of climate change. Through in-depth research we have deepened our own understanding of how climate change is impacting on people living in poverty in developing countries, and how best to support them to adapt<sup>2</sup>. Our work highlights the human face of climate change<sup>3</sup> and seeks to increase understanding of the inter-connections between lifestyles and public policy choices in Ireland and the UK, and the impacts of continued climate change on the most vulnerable. Trócaire is supporting people in developing countries to adapt their livelihoods to better cope with the changing climate and is standing with them in calling on political leaders to take action.

Trócaire is inspired by households, communities and companies that are making choices in favour of a more sustainable society. Commitment at these levels must be met with political action through public policy if we are to ensure that we do enough, quickly enough, and that the most vulnerable in society are the centre of concern.

## Emission targets

Current commitments to reduce greenhouse gas emissions are far below what is needed to avoid the worst impacts of climate change. While the international community has committed to holding a further rise in global average temperatures below 2°C, above pre-industrial levels, current emission reduction targets will lead to a further 3 or 4°C rise, with catastrophic consequences for all, in particular the most vulnerable people<sup>4</sup>. People living in poverty in developing countries are already struggling to cope with the impacts of existing levels of warming. The Northern Ireland Executive has a moral obligation to set and reach ambitious targets as part of the global effort to reduce emissions.

The key commitment made in the Draft Programme for Government on climate change is to, 'continue to work towards a reduction in greenhouse gas emissions by at least 35% on 1990 levels by 2025 (DOE)'.<sup>5</sup>

A recent statement made by the Environment Minister on 23 November 2011 highlights the need to sharpen ambition on emission targets;

*"The Committee on Climate Change provided advice to me recently that confirms there is potential for further reductions, particularly in transport, agriculture and residential emissions. I will therefore continue to challenge all in government to*

<sup>2</sup> Trócaire and the International Development Institute (2010), 'Societies in transition: An interim report on a two year study of climate change, vulnerability and resilience in Africa and Latin America'

<sup>3</sup> Trócaire, 'Changing Lives. Climate Change in the Developing world', <http://www.trocaire.org/sites/trocaire/files/pdfs/policy/ChangingLives.pdf>

<sup>4</sup> [http://climateactiontracker.org/assets/publications/briefing\\_papers/CAT\\_Durban\\_update\\_2\\_20111211.pdf](http://climateactiontracker.org/assets/publications/briefing_papers/CAT_Durban_update_2_20111211.pdf)

<sup>5</sup> NI Executive (2011), 'The Draft Programme for Government 2011-15', <http://www.northernireland.gov.uk/draft-pfg-2011-2015.pdf>

*do more. My view is that we should use all the robust and expert evidence at our disposal to set climate change targets which are rigorous and challenging. I believe new local climate change legislation can help deliver further reductions and contribute to greater certainty on progress towards achieving our target for greenhouse gas emission reductions.*<sup>6</sup>

The latest annual projection figure (based on 2008 data) indicates that Northern Ireland emissions in 2025 are likely to reduce by 33% compared with the baseline (1990).<sup>7</sup> In Trócaire's opinion this lends weight to the argument for more challenging targets to be set in the Programme for Government. Trócaire therefore recommends that the emission targets should be increased as part of the Act so as to represent a 40% cut in emissions by 2020, and a target of 80% reductions by 2050, both based on 1990 levels.

## Northern Ireland Climate Change Act

Although the UK Climate Change Act (2008) extends to Northern Ireland, the Act does not require specific targets or carbon budgets for Northern Ireland. Trócaire is disappointed that unlike other devolved administrations, most notably the Scottish Parliament which enacted the Climate Change (Scotland) Act 2009, the Northern Ireland Executive has made no commitment to bring forward a local Climate Change Act. This was highlighted by a recent report published by the Committee on Climate Change entitled, 'The appropriateness of a Northern Ireland Climate Change Act' which made the following key recommendation;

*"from the experience at the UK level and in Scotland suggests that legislation is helpful in underpinning low carbon objectives, by making long term commitments to reduce emissions, including through providing certainty to business and policymakers."*<sup>8</sup>

A Northern Ireland Climate Change Act is urgently needed to ensure that all Departments across the Executive, and all future Governments plan and implement effective policies that ensure we meet our targets in a timely and consistent manner. An effective climate law would provide a framework for coherent policy development, and a tool to ensure accountability and transparency in achieving progress in both greenhouse gas emission reductions and in the necessary shift to a low carbon future.

At the recent Durban climate conference in December 2011 the international community agreed to work towards a new global climate agreement to be in force by 2020. However, unless action is stepped up in the short-term this will be too late to avoid the worst impacts. The slow pace of the international process calls for greater ambition to be built from the bottom up. A strong Climate Change Act can ensure Northern Ireland does its fair share in the global effort, and would send a strong signal to our partners across the UK, Ireland and Europe, as well as to the international negotiations. As a developed region of the world with disproportionately high emissions for our population size, effective and consistent action on climate change is our moral responsibility as well as our legal and political obligation.

<sup>6</sup> Northern Ireland Assembly (23 November 2011), Written Question to the Environment Minister AQW 5643/11-15

<sup>7</sup> Northern Ireland Assembly (18 November 2011), Written Question to the Environment Minister AQW 5037/11-15

<sup>8</sup> Committee on Climate Change (2011), 'The appropriateness of a Northern Ireland Climate Change Act'

<http://downloads.theccc.org.uk/s3.amazonaws.com/Northern%20Ireland%20-%20Annex%20-%20Advice%20on%20CC%20Act.pdf>

## **International Development Strategy**

Following a cross-party motion, the previous Assembly on 1 March 2011 unanimously endorsed the report entitled, 'International Development Strategy for Northern Ireland' from the All Party Group on International Development. The motion called upon the First Minister and Deputy First Minister to incorporate its findings into the International Relations Strategy and to implement its recommendations.

Trócaire urges this Executive to provide the political leadership to develop the Assembly's strategy in northern Uganda, based on the report commissioned by the All Party Group on International Development in conjunction with NI-CO and CADA, and endorsed by the Northern Ireland Assembly.

Trócaire recognises that development is a reserved issue and the main agency for the delivery of overseas development in the UK is the Department for International Development. However, OFMDFM have the opportunity to provide regional leadership on international development within the devolved structures.

The Scottish Government has implemented an important international development component to their devolved work and likewise with the Welsh Assembly in terms of its work in Africa. The Executive has the opportunity to make a key contribution to the work proposed by the All Party Group on International Development as part of their International Relations Strategy without infringing on structures and legislation on international development.

Trócaire therefore wishes to see the development of a relevant strategy as well as the identification of a budget to follow on from the Northern Ireland Assembly's motion and the All Party Group's work which has provided an effective pathway for the Executive's future engagement on international development. Trócaire would like to see this pursued as part of OFMDFM's International Relations Strategy and stated as a key commitment in the Programme for Government.

## **Key recommendations**

Trócaire makes the following recommendations to the Office of the First Minister and Deputy First Minister to be included in the Programme for Government 2011-15:

1. Introduce a Northern Ireland Climate Change Act with a legally binding regional target to reduce our carbon emissions from 1990 levels by at least 40% by 2020 and 80% by 2050.
2. Set an annual Northern Ireland Carbon Budget to achieve an immediate and sustained decline in Northern Ireland's greenhouse gas emissions by an average of at least 3% per annum.
3. Assist the poorest countries and biodiversity (in Northern Ireland and around the world) to adapt to the unavoidable effects of climate change by urging the UK, Ireland and the EU to support and strengthen the UN's international Adaption Fund to support developing countries to protect themselves against the effects of climate change.

4. To incorporate the findings and recommendations from the All Party Group on International Development's report, 'International Development Strategy for Northern Ireland' into the Executive's International Relations Strategy.

## **Summary**

For Trócaire climate change presents one of the defining justice issues of our time. As well as pushing for a fair and binding international agreement at global level, and delivering adequate and additional finance for developing countries to adapt to the impacts of climate change, we must also act at home.

Early and effective action has been proven to be the most effective and cost efficient approach to tackling climate change and indeed it is the only ethical option. Trócaire calls upon OFMDFM to adopt our key recommendations on climate change in the Programme for Government 2011-15. Legislation will not just benefit us here at home but also those living in the developing world, to whom there is a moral responsibility to act.

Trócaire also urges OFMDFM to incorporate the findings and recommendations from the All Party Group on International Development's report, 'International Development Strategy for Northern Ireland' into the Executive's International Relations Strategy. Trócaire calls upon OFMDFM to include this as a key recommendation in the Programme for Government to move international development up the political agenda to reflect the cross-party support in the Northern Ireland Assembly.