

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2

SUMMARY OF RESPONSES RELATING TO OVERALL ISSUES

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SUMMARY OF RESPONSES RELATING TO OVERALL ISSUES

THOSE FOR APPROACH:

COMMENTS	ORGANISATION
Welcomes shift to broader anti poverty agenda	<ul style="list-style-type: none"> ○ ADMCPA ○ Communities in Transition ○ General Teaching Council NI ○ Translink ○ WHSSB
Welcomes commitment to develop APS for NI	<ul style="list-style-type: none"> ○ Institute for Public Health ○ NCH ○ NIAPN ○ NIAPN Derry workshop 2 ○ South East Belfast H&SST
<p><u>In addition</u> Welcome the fact that doc is not finalised proposed strategy and has some way to go before it becomes a strategy for action recognises some of the impacts of conflict on poverty – difficult to see what is being proposed in terms of identified priorities and objectives</p>	<ul style="list-style-type: none"> ○ Antrim Borough Council ○ Equality Commission ○ NIAPN Belfast workshop 2 ○ NIAPN Derry workshop 1

THOSE AGAINST APPROACH:

COMMENTS	ORGANISATION
<p>Overall Do not accept current proposals as basis for way forward</p> <p>little difference between phase 1 and phase 2 –appear to be much the same</p> <p>Concerns about process and disappointed with quality and content of phase 2 doc.</p> <p>Serious concerns about clarity on status of the document, its ability to make meaningful contribution to persistent poverty and overall lack of strategy to tackle poverty</p> <p>Doc does not say how it will tackle poverty or what will change</p> <p>Fails to provide insight into how future measures will be developed and resourced.</p> <p>Proposals are not sufficiently systematic and comprehensive.</p> <p>Not enough clarity about concept of anti-poverty strategy and benefits clear and robust strategy could bring</p> <p>Proposed format does not have confidence of the sector - the organisations working closely with those affected by poverty, disadvantages and social exclusion,</p>	<ul style="list-style-type: none"> ○ Armagh Senior Citizens Forum ○ Age concern ○ Belfast City Council ○ Caroline Murphy ○ Children’s law centre ○ CINI ○ Citizens Advice Bureau ○ Dr Callie Persic ○ Equality Commission ○ General Teaching Council NI ○ Help the Aged ○ Institute for Public Health ○ Job Assist Centre, West Belfast ○ Labour Party ○ Lenadoon Community Forum ○ Martin Flynn ○ NCH ○ NEA ○ NIACRO ○ NIAPN Belfast workshop 3 ○ NIAPN Derry workshop 1 ○ NIAPN Omagh workshop 1 ○ NIAPN workshops ○ NICVA ○ North West Belfast HAZ ○ RCN ○ Save the Children ○ South Antrim Rural Community Network ○ Southern H&SSB ○ West Belfast Economic Forum ○ West Belfast Partnership Board ○ Youthnet
<p>TSN legacy Apprehensive about endorsing a policy that has not proved effective on the ground, new TSN had not impacted upon areas of deprivation, need to address shortcoming before moving on</p> <p>it is a hybrid policy, evolved over time and not completely geared towards the comprehensive approach we need to see</p>	<ul style="list-style-type: none"> ○ Caroline Murphy ○ Dr Callie Persic ○ NEA ○ Disability Action ○ Martin Flynn ○ NICCY ○ Save the Children ○ Sinn Fein ○ West Belfast Economic Forum ○ West Belfast Partnership Board ○ youth@children’s law centre

<p><u>Role of Stakeholders</u> Government paying lip-service to the sector. No consideration of tangible impact of the sector</p> <p>Appears to ignore the principle of consultative policy making and the spirit of NAPSinc objective 4, mobilising all actors.</p> <p>APS must involve government working with all stakeholders on its delivery and development of its targets.</p>	<ul style="list-style-type: none"> ○ Gingerbread ○ NEA ○ NIAPN ○ NIAPN Belfast workshop 1 ○ NIAPN Derry workshop 2
<p><u>Definitions</u> Need wider insight into causes of poverty, impact of poverty</p> <p>Need to clearly define what is meant by 'poverty',</p> <p>new TSN had no clear definition of 'social need' leading to departments using wide range of definitions</p>	<ul style="list-style-type: none"> ○ Age concern ○ Belfast City Council ○ Belfast Healthy Cities ○ Children's law centre ○ CINI ○ Communities in Transition ○ Equality Commission ○ Institute for Public Health ○ Job Assist Centre, West Belfast ○ NIAPN Omagh workshop 1 ○ NICCY ○ NICVA ○ Save the Children ○ West Belfast Economic Forum ○ Youthnet
<p><u>Areas needing more attention</u></p>	
<p>Fuel poverty</p>	<ul style="list-style-type: none"> ○ NEA
<p>Income inadequacy (both benefits and wages)</p>	<ul style="list-style-type: none"> ○ NEA ○ NICVA
<p>Equality</p> <p>Disability</p> <p>Ethnic minorities</p> <p>Good relations</p>	<ul style="list-style-type: none"> ○ Equality Commission ○ NIAPN ○ NIAPN Derry workshop 1 ○ NIAPN Derry workshop 2 ○ NIAPN Omagh workshop 1 ○ NICVA ○ Sinn Fein

<p>Rural poverty</p>	<ul style="list-style-type: none"> ○ Caroline Murphy ○ Dr Callie Persic ○ Martin Flynn ○ NCH ○ NIAPN ○ NIAPN Omagh workshop 1 ○ NICVA ○ RCN ○ Roger Sullivan, Rural Community Network (NIAPN Omagh Workshop) ○ South Antrim Rural Community Network ○ West Belfast Partnership Board
<p>Impact and legacy of the conflict</p>	<ul style="list-style-type: none"> ○ ADMCPA ○ Caroline Murphy ○ Dr Callie Persic ○ Gingerbread ○ Institute for Public Health Cathy Stanton Sinn Fein (NIAPN Belfast workshop 1) ○ Martin Flynn ○ NIAPN ○ NICCY ○ Royal Hospitals ○ Save the Children ○ Sinn Fein ○ Sinn Fein/Craigavon BC ○ West Belfast Partnership Board ○ Youth@children's law centre
<p>Pensioner poverty</p>	<ul style="list-style-type: none"> ○ Armagh Senior Citizens Forum ○ Help the Aged ○ NIAPN Omagh workshop 1
<p>Seasonal poverty– e.g. over summer months and for those with teenage children who are not eligible for benefits</p>	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 2

<p><u>Specific issues re child poverty</u> Child poverty ignored in APS</p> <p>Need a clear commitment to eradicate child poverty in NI, little evidence that 1999 pledge to do so by UK government has seen any actions</p> <p>Children's strategy and APS –need evidence of joined up working – each should have common chapter, report back on progress towards targets. APS should take the lead role</p> <p>Full and effective implementation of UNCRC is not possible without a workable APS, required to actively protect and promote the rights of children and young people</p> <p>Need to include 16-18 year olds not in education, training or employment – a growing group experiencing poverty, their situation adds further to poverty of low and no income families</p> <p>Government have made major strides in GB to tackle poverty, particularly child poverty, England has seen massive investment in family centres in deprived areas and in schemes like Sure Start – why are children in NI not entitled to the same opportunities as those in England?</p>	<ul style="list-style-type: none"> ○ Ann Johnston, Save the Children (NIAPN Derry workshop) ○ Caroline Murphy ○ Children's Law centre ○ CINI ○ Citizen Advice Bureau ○ Derry Children's Commission ○ Dr Callie Persic ○ Gingerbread ○ Inner city south Belfast SureStart ○ Job Assist Centre, West Belfast ○ Joy Poots – Sure Start, (NIAPN Belfast workshop 1) ○ Lenadoon Community Forum ○ Martin Flynn ○ NCH ○ NHSSB ○ NIAPN ○ NIAPN Belfast workshop 2, 3 ○ NIAPN Derry workshop 1 ○ NIAPN Omagh workshop 1 ○ NICCY ○ NICVA ○ Save the Children ○ Sinn Fein ○ Teresa Geraghty Save the Children (NIAPN Belfast workshop 1) ○ West Belfast Partnership Board ○ Youth @Children's law centre
<p>student loans and student debt, higher education now less attractive for those from poor backgrounds</p>	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 2 ○ NIAPN Omagh workshop 1
<p>Lack of focus on personal development of young people and those experiencing poverty</p>	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1
<p>debt and indebtedness</p>	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1
<p>Needs to be regionally reflective</p>	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1
<p>Effect of the border</p>	<ul style="list-style-type: none"> ○ Barry McElduff, Sinn Fein (NIAPN Omagh workshop 1) ○ Gerry McLoughlaine, Mind the Gap (NIAPN Omagh workshop 1) ○ NIAPN Derry workshop 1 ○ NIAPN Omagh workshop 1 ○ Sinn Fein

<p><u>Social and economic factors</u> Document over emphasises importance of economics and employability as a route out of poverty – there needs to be an equal emphasis on social provision,</p> <p>the relationship between social and economic outcomes are over simplified</p> <p>APS should tackle low pay, childcare provision, educational achievement, health inequalities, housing</p> <p>Need to promote social responsibility and active engagement of all citizens</p>	<ul style="list-style-type: none"> ○ Armagh Senior Citizens Forum ○ Caroline Murphy ○ Cathy Stanton Sinn Fein (NIAPN Belfast workshop 1) ○ Dr Callie Persic ○ Help the Aged ○ Martin Flynn ○ NIAPN Belfast workshop 1 ○ NIAPN Derry workshop 1 ○ NICVA ○ West Belfast Partnership Board
<p><u>Rights based approach</u> Should be an acknowledgment in APS that poverty a fundamental denial of human rights</p> <p>APS should be built on visionary, rights based approach. Should be new, more directive initiatives aimed at bringing about a more equal society</p>	<ul style="list-style-type: none"> ○ Institute for Public Health ○ NIAPN Derry workshop 1 ○ NIAPN Derry workshop 1 ○ NICCY ○ Sinn Fein
<p>Should be a lifecycle approach to tackling poverty and social exclusion (re DWP)</p>	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1 ○ Save the Children

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SUMMARY OF RESPONSES RELATING TO CHAPTER 1

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	None specific	
SPECIFIC SECTION		

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	None specific	
SPECIFIC SECTION		

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SUMMARY OF RESPONSES RELATING TO CHAPTER 2

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Detailed discussion in this section is helpful	<ul style="list-style-type: none"> ○ CCMS ○ Southern Investing for Health Partnership
	Need ongoing commitment to research at local level, comparative studies at national and international level is continued – this will help ensure NI does not fall behind other countries in efforts to address this issue	<ul style="list-style-type: none"> ○ Southern Investing for Health Partnership
	Evidence demonstrates NI has generally higher levels of poverty, confirms and supports demands placed upon provision of health and social care services in NI	<ul style="list-style-type: none"> ○ Sperrin Lakeland H&SST
	When considering needs of those in poverty, impact upon them – specify psychological impact	<ul style="list-style-type: none"> ○ British Psychological Society
SPECIFIC SECTION		
	2.1-2.11 measures of poverty and deprivation – need to include consideration of choices people on low income must make, e.g. food and clothing, such information even if qualitative rather than quantitative merits work across departments	<ul style="list-style-type: none"> ○ Disability Action
	2.34 – 2.49 a cultural of dependency within which disabled people are regarded as passive leads disabled people to accept this assessment and to lack confidence to try work, APS must recognise these practical and attitudinal issues	<ul style="list-style-type: none"> ○ Disability Action
	2.34 reference to increasing ageing population – important not to underestimate impact of this trend, NISRA predictions of aging population not reflected in the document	<ul style="list-style-type: none"> ○ Armagh Senior Citizens Forum ○ Help the Aged

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Measurements are not clearly defined or accessible	<ul style="list-style-type: none"> ○ NIAPN
	Need clarity on current baselines being used and how future progress will be evaluated	<ul style="list-style-type: none"> ○ NIAPN
	APS failed to give due cognizance to child poverty measures which include a mixed measure of deprivation and low income – endorsed by EU and UK govts – these measures should provide a sound baseline analysis of extent and depth of child poverty and inform development of the strategy	<ul style="list-style-type: none"> ○ Children’s Law Centre ○ CINI ○ Save the Children
	Lack of clarity on causes of differentials between the two main communities and how social and economic inequalities can be addressed	<ul style="list-style-type: none"> ○ ADMCPA
	<p>Lack of analysis linking poverty and conflict, omits those worse affected, fails to identify specific impacts upon disadvantaged vulnerable individuals and communities groups where measurement poses a problem, e.g. ethnic minority groups</p> <p>Growing risk of students and indebtedness – increasingly manifest itself in depression and mental health problems, this often dismissed as an issue but particular for students from poor backgrounds it is a serious one</p>	<ul style="list-style-type: none"> ○ ADMCPA ○ Armagh Senior Citizens Forum ○ Belfast Healthy Cities ○ Caroline Murphy ○ Dr Callie Persic ○ Equality Commission ○ Help the Aged ○ Martin Flynn ○ NIAPN Derry workshop 1 ○ Sinn Fein ○ South East Belfast H&SS Trust ○ West Belfast Partnership Board
	Does not recognise that gap between rich and poor is widening	<ul style="list-style-type: none"> ○ Caroline Murphy ○ Dr Callie Persic ○ Martin Flynn ○ West Belfast Partnership Board
	Lack of analysis on the impact of the border on poverty and social exclusion	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1

	Lack of understanding of role of continued under investment west of the Bann had played on creation of poverty and access to services	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1
	Disappointed by lack of figures on levels of poverty experienced by people with a disability. Lack of research in this area, urge OFM to carry out commission research to outline extent and impact o poverty amongst disabled children and adults	<ul style="list-style-type: none"> ○ MENCAP
	<p><u>Additional Research</u> APS should be based on strong rigorous research to improve understanding of the pathways into and out of poverty. Øyen (2005)</p> <p>There is a failure to highlight and draw upon available research into causes and effects of poverty in NI, including: Bare Necessities Report Mapping Poverty The Bottom Line NICCY DWP OFMDFM</p>	<ul style="list-style-type: none"> ○ Children’s Law Centre ○ Communities in Transition ○ Gingerbread ○ Institute for Public Heath ○ NCH ○ NIAPN Derry workshop 2 ○ NICCY ○ Save the Children
SPECIFIC SECTION	None specific	

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SUMMARY OF RESPONSES RELATING TO CHAPTER 3

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Welcomed the clear account of the difficulties surrounding new TSN.	<ul style="list-style-type: none"> ○ Antrim Borough Council
	<p>Agrees with findings of Deloitte Touch evaluation there was evidence of skewing budgets and effort but that the evaluation did not ascertain whether or not new TSN had resulted in reduction in poverty.</p> <p>New TSN may have been mainstreamed, but NI is still one of the most unequal societies in the developed world. The policy had some success, modest in range and scale but it has been ineffective in tackling social need</p>	<ul style="list-style-type: none"> ○ Royal Hospitals
SPECIFIC SECTION		

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	<p>Need to acknowledge that TSN failed., yet government still trying to get it to work</p> <p>Questions the suggestion that TSN has been successfully mainstreamed – statistically NI has a higher proportion of families suffering from poverty than rest of UK</p> <p>Concerned that government is congratulating itself on a policy that has failed to deliver for people living in poverty</p>	<ul style="list-style-type: none"> ○ Children’s Law Centre ○ Citizens Advice Bureau ○ Gingerbread ○ Job Assist Centre, West Belfast ○ Lenadoon Community Forum ○ NIAPN ○ NIAPN Omagh workshop 1
	Concerned that new TSN not embedded within depts, nor successfully mainstreamed as it should have been	<ul style="list-style-type: none"> ○ Children’s law centre
SPECIFIC SECTION		

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SUMMARY OF RESPONSES RELATING TO CHAPTER 4

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL		
SPECIFIC SECTION		

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL		
SPECIFIC SECTION	4.5 Sectoral response via NICVA of 180 other voluntary and community sector organisations not acknowledged or referenced	○ NIACRO
	4.7 NICVA's response was critical of <i>New TSN - The Way Forward</i> – it is not accurate to state that in general there was broad support of the general architecture of the strategy	○ Gingerbread ○ NIACRO
	4.9 “a high level framework does not seek to identify specific initiatives... actions... targets ...” – this is unacceptable, EU NAP does, so should APS	○ NIAPN

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2

SUMMARY OF RESPONSES RELATING TO CHAPTER 5

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL		
SPECIFIC SECTION	5.5 Anti-poverty strategy in context of EU social inclusion strategy will help underpin EU Peace programme and peace building at wider societal levels	<ul style="list-style-type: none"> ○ ADMCPA
	5.11 welcome approach consistent with EU NAP, but need more detail	<ul style="list-style-type: none"> ○ Equality Commission ○ NIAPN ○ NIAPN Belfast workshop 2 ○ NIAPN Omagh workshop 1
	<p>Need clarification between objectives of NAP and APS</p> <p>RAP should commit to 4 European objectives</p>	<ul style="list-style-type: none"> ○ Children’s law centre ○ CINI ○ NIAPN ○ NIAPN Belfast workshop 2 ○ NIAPN Belfast workshop 3 ○ NIAPN Omagh workshop 1 ○ Save the Children
	APS should draw more on experience of international, European, Irish and UK developments	<ul style="list-style-type: none"> ○ Equality Commission ○ Institute for Public Health ○ West Belfast Economic Forum

	<p>Needs to be more north/south approach, need to take areas and communities at micro level and tie it all in to NAPsinc framework</p> <p>Link to regional action plans being developed for the border corridor, Cohesion Funds, will help sharing and pooling resources</p> <p>North and the South have a common chapter within their NAPsinc docs in terms of cross border poverty alleviation</p> <p>How will RAP link with RAP for cross border bodies such as ICBAN, should be involved in consultation</p>	<ul style="list-style-type: none"> ○ Damien McIlroy Top of the Hill 2010, (NIAPN Derry Workshop) ○ Goretti Horgan (NIAPN Derry workshop 1) ○ Kenny McAdams, Disability Action (NIAPN Derry workshop 1) ○ NIAPN Belfast workshop 1 ○ NIAPN Derry workshop 1 ○ NIAPN Omagh workshop 1 ○ Sinn Fein
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THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	None specific	
SPECIFIC SECTION		

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2

SUMMARY OF RESPONSES RELATING TO CHAPTER 6

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Welcomes introduction of strategic framework	<ul style="list-style-type: none"> ○ Belfast Healthy Cities
	Provides a sharper focus. The framework as a whole and its component parts should all bring a degree of cohesion to the overall strategy.	<ul style="list-style-type: none"> ○ General Teaching Council ○ Southern Investing for Health Partnership ○ NHSSB
	Supports the underlying 'principle of targeting' as a means of confronting and challenging inequalities	<ul style="list-style-type: none"> ○ CCMS
	Welcome recognition that further work is required linking equality agenda to the strategy	<ul style="list-style-type: none"> ○ NI Legal Services Commission
	APS must have a broad scope to give legitimacy and encouragement to initiatives aimed at countering inequalities in healthcare access and delivery.	<ul style="list-style-type: none"> ○ Royal Hospitals
SPECIFIC SECTION	6.1 Welcome change of name to anti-poverty strategy	<ul style="list-style-type: none"> ○ A&D HAZ ○ Causeway H&SST ○ General Teaching Council ○ Southern Investing for Health Partnership
	Endorses broader scope Agrees with strategic aim Welcomes clear overall strategic objective	<ul style="list-style-type: none"> ○ Antrim Borough Council Causeway H&SST ○ Belfast City Council ○ Craigavon BC ○ South & East Belfast H&SST ○ Southern H&SSB ○ Sperrin Lakeland H&SST
	Agree that capacity building is important	<ul style="list-style-type: none"> ○ Youthnet
	Agrees with prioritisation	<ul style="list-style-type: none"> ○ South & East Belfast H&SST ○ Belfast Healthy Cities ○ Craigavon BC

	Welcome commitment to focus on outcomes and proposed use of a broad range of indicators	<ul style="list-style-type: none"> ○ NIAPN
	In addition:	
	Move towards outcomes welcomed but language needs to be tied down	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1
	focus on outcomes welcomed, but these should be identified by people experiencing poverty and not civil servants	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1
	could accept strategic aim – in short to medium term but it is not acceptable as the ultimate outcome of APS, the weakness can only help APS to fail, need stronger statement	<ul style="list-style-type: none"> ○ NEA
	capacity building, employability and tackling financial exclusion – 3 high level priorities, but tackling poverty will require a cross sectoral departmental approach, supported by a robust strategy	<ul style="list-style-type: none"> ○ A&D HAZ ○ Belfast City Council ○ Disability Action ○ Equality Commission ○ General Teaching Council ○ Southern Investing for Health Partnership
	6.2	
	6. 2 Welcome fact that framework aimed at various levels – individuals, areas, communities and vulnerable groups	<ul style="list-style-type: none"> ○ Belfast City Council ○ Communities in transition
	6.3 PSI groups	
	support in principle the PSI group for lone parents	<ul style="list-style-type: none"> ○ NEA ○ Belfast City Council

	<p>welcome emphasis on lone parents but concerned that about current PSI format</p> <p>no new PSI groups should be set up until previous ones have been evaluated, e.g. Travellers PSI group has had very little impact</p> <p>urgent need to ensure strategic issues which cross PSI groups are identified and processed. Issues of multiple identity must be targeted e.g. women with learning disability, children who are carers</p> <p>other vulnerable groups should also be included to include those with equally significant levels of poverty group</p> <p>should have the power to ensure recommendations are acted upon, and be able to monitor and evaluate the impact of measures on the target group.</p> <p>involve the target group in the PSI group</p>	<ul style="list-style-type: none"> ○ Age Concern ○ Belfast Healthy Cities ○ Caroline Murphy ○ Children's law centre ○ CINI ○ Communities in Transition ○ Disability Action ○ Dr Callie Persic ○ Equality Commission ○ Gingerbread ○ Gingerbread ○ Martin Flynn ○ MENCAP ○ NIAPN Belfast workshop 3 ○ NIAPN Derry workshop 2 ○ Save the children ○ West Belfast Partnership Board
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	<p>6.3. APF</p> <p>Welcomed</p> <p>Having APF led at ministerial Level should provide necessary leadership to maximise success of APS</p>	<ul style="list-style-type: none"> ○ Antrim Borough Council ○ CCMS ○ General Teaching Council NEA ○ NI Legal Services Commission ○ Royal Hospitals
	<p><u>In addition</u></p> <p>Should include representation from all sectors strongly recommend inclusion of children and young people in proposed structures as per obligations in UNCRC and s75.</p> <p>Resources should be provided for local groups to enable capacity building for people experiencing poverty to be actively involved</p> <p>Welcome that will be led at Ministerial level, but concerned that it does not appear to have any authority</p> <p>Should include local accountability, report to central, resourced unit</p> <p>links with other key groupings such as the Ministerial group for public health to ensure consistency in setting targets and performance indicators</p> <p>External stakeholders should be involved as partners not observers</p> <p>Potential to be strong if it develops inclusive and participative processes that take account of geography and.</p> <p>Subgroups of APF should be set up to match APS target groups, must have remit to make them more effective than PSI group.</p> <p>Powers to ensure recommendations acted upon, monitor and evaluate impact on their target group</p>	<ul style="list-style-type: none"> ○ ADMCPA ○ Barry McElduff, Sinn Fein (NIAPN Omagh workshop 1) ○ Belfast City Council ○ Belfast Healthy Cities ○ Caroline Murphy ○ Children and Young people in Derry ○ Children's law centre ○ CINI ○ Citizens advice bureau ○ Communities in Transition ○ Craigavon BC ○ Dr Callie Persic ○ Equality Commission ○ Gingerbread ○ Labour Party ○ Martin Flynn ○ NHSSB ○ NIAPN ○ NIAPN Belfast workshop 1, 2, 3 ○ NIAPN Derry workshop 1, 2 ○ NIAPN Omagh workshop 1 ○ NIAPN workshops ○ NICCY ○ Save the Children ○ Sinn Fein ○ West Belfast Partnership Board ○ youth@clc ○ Youthnet

	<p>Should develop a common platform and policy agenda between APF and NAPS social inclusion forum in the 26 counties</p> <p>Also need an inter-departmental working group at government level, to facilitate co-operation, to assist APF in drafting and implementing common chapter on poverty; to assist all Ireland ministerial council in drafting, actioning and reporting APS, etc</p>	Sinn Fein
	6.3 RAP	
	<p>Welcomed</p> <p>greater connectivity between NAP, to be welcomed.</p>	<ul style="list-style-type: none"> ○ ADMCPA ○ Belfast City Council ○ Citizen advice bureau ○ NI Legal Services Commission ○ South & East Belfast H&SST
	<p><u>In addition</u></p> <p>6. 3 RAP and APS should include system of child rights indicators and child rights impact assessment –to monitor progress and evaluate impact- compliance with the general principles of UNCRC</p> <p>Concerned that the real strategy will be laid out in RAP, but no details provided re RAP timetable, budget and clearly defined accountability structure</p> <p>define clear outcomes against measurable time frame and identified sources of funding</p> <p>process for developing RAP should be modified, (see ROI example) particularly the development of principles underlining the development of NAPs</p> <p>RAP should be consulted on - this will allow for real influence on the strategic targets from the sector</p>	<ul style="list-style-type: none"> ○ Age Concern ○ Armagh Senior Citizens Forum ○ Belfast Healthy Cities ○ Children's law centre ○ Communities in transition ○ Craigavon BC ○ Equality Commission ○ Gerry McLoughlainn Mind the Gap (NIAPN Belfast workshop 1) ○ Help the Aged ○ NIAPN ○ NIAPN Belfast workshop 1 ○ Southern Investing for Health Partnership ○ West Belfast Partnership Board ○ Youthnet

	RAP will be consistent with NAP but no specific mention of co-ordination with Irish APS – particularly important for communities in the border regions, plus those affected by the conflict	<ul style="list-style-type: none"> ○ ADMCPA
	does not appear to be in line with last NAP nor is it as ambitious in its mission and targets	<ul style="list-style-type: none"> ○ Caroline Murphy ○ Dr Callie Persic ○ Martin Flynn ○ West Belfast Partnership Board
	6.4	
	welcomes emphasis on cross departmental co-ordination	<ul style="list-style-type: none"> ○ General Teaching Council
	Anticipates that APF will take account of RPA How will APS work with RPA- this is crucial in terms of how the strategy will be actioned at local levels	<ul style="list-style-type: none"> ○ Belfast City Council ○ NIAPN Derry workshop 1
	6.6	
	<p>Fig 3 – SureStart is the only anti poverty initiative directed at children mentioned in the doc.</p> <p>SureStart may have made valuable impact on children in deprived areas in England –but not implemented nor resources in same way NI – and does not deal with children up to 18.</p> <p>flawed example of joined up work – not supported to same degree in NI as it is in England</p> <p>only deals with 0-4 year olds. Need to develop a range of initiatives to address deprivation at all stage of childhood</p>	<ul style="list-style-type: none"> ○ Children’s law centre ○ Caroline Murphy ○ CINI ○ Citizens advice bureau ○ Dr Callie Persic ○ Joy Poots – Sure Start (NIAPN Belfast workshop 1) ○ Martin Flynn ○ NIAPN Derry workshop 1, 2 ○ NIAPN Omagh workshop 1 ○ Save the children ○ West Belfast Partnership Board
	<p>Fig 3 – disappointed that disability issues not detailed</p> <p>Figure 3 page 58 – no narrative to explain how components relate to each other – e.g. conflict, capacity building and employment opportunities</p>	<ul style="list-style-type: none"> ○ ADMCPA ○ Disability Action

	6.7	
	6.7 dept action plans should be linked should contain new initiatives APS should be directive not suggestive in its approach, do not leave depts to establish their own internal arrangements	<ul style="list-style-type: none"> ○ Belfast Healthy Cities ○ Caroline Murphy ○ Dr Callie Persic ○ Martin Flynn ○ North West Belfast HAZ
	6.8 building on existing programmes	
	6.8 Partnership approach welcomed but lack of visible reference to induct all depts into the ethos of New TSN	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 2
	6.8 recognises that building on existing policy and programmes is important and purpose of APS not to change this approach but to promote a more joined up approach focused on those most in need	<ul style="list-style-type: none"> ○ General Teaching Council

	<p><u>In addition</u> Strategies should be linked not only at departmental level but also at regional and local level- this is where the key actions will be implemented to affect desired outcomes and achieve the aim of APS</p> <p>Would like to see all depts demonstrate a shared agenda to ensure effective mainstreaming</p> <p>Should be co-ordination of a comprehensive strategies framework for addressing poverty, inequality and social exclusion, shared targets</p> <p>APS should be the key strategy driving, informing, directing and holding to account all other strategies currently being developed. Investing for Health, CYP, Gender, Fuel poverty carers strategy , family support Investing for Health, Neighbourhood Renewal strategies are all interwoven and must be led by a clear APS</p> <p>Pathways and processes to identify existing anti poverty work are needed – e.g. Investing for health, voluntary and community anti-poverty work – this should then impact upon allocation of resources through proper pathways for delivery</p>	<ul style="list-style-type: none"> ○ A&D HAZ ○ Belfast Healthy Cities ○ Caroline Murphy ○ Citizen advice bureau ○ Craigavon BC ○ Damien McIlroy Top of the Hill 2010 (NIAPN Derry workshop 2) ○ Dr Callie Persic ○ Equality Commission ○ Gingerbread ○ Institute for Public Health ○ Kevin O’Carroll, Triax (NIAPN Derry workshop) ○ Martin Flynn ○ Mimi McAlinden Investing for Health Team Eastern Area Partnership (NIAPN Belfast workshop 1) ○ NIAPN ○ NIAPN Belfast workshop 1, 2 ○ NIAPN Derry workshop 1, 2 ○ NIAPN Omagh workshop 1 ○ Sinn Fein ○ SHSSB ○ South East Belfast H&SST ○ Southern Investing for Health Partnership ○ West Belfast Partnership Board
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THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	<p>Framework Structure</p> <p>Lack of clearly defined timetables, action points, targets and roles and responsibilities of government depts – further evidence to lack of significance of the strategy</p> <p>Broad based strategy should look at root causes and effects of poverty and inequality. Supported by action programme, targets and budgets</p>	<ul style="list-style-type: none"> ○ Caroline Murphy ○ Children’s law centre ○ CINI ○ Dr Callie Persic ○ Institute for Public Health ○ Martin Flynn ○ NIAPN ○ North West Belfast HAZ ○ Sinn Fein
	<p>New TSN was characterised by a lack of consistency, communication and cross-departmental co-operation, there is little evidence in APS that the structures and processes that will underpin the new strategy will lead to an increasingly holistic approach.</p> <p>Mainstreaming already proved itself to be ineffective</p>	<ul style="list-style-type: none"> ○ Citizen advice bureau ○ NIAPN Belfast workshop 2
	Lack of reference to cross sectoral work	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 2
	Requires recognition of the role of private, community and voluntary sectors	<ul style="list-style-type: none"> ○ Equality Commission
	Strategy should explicitly identify all vulnerable groups at risk of poverty	<ul style="list-style-type: none"> ○ Belfast Healthy Cities ○ NIAPN Belfast workshop 1
		<ul style="list-style-type: none"> ○

	<p>Need to examine the high level of economic inactivity in NI, enhance employability, increase well-paid jobs, should include greatly increased resources for the social economy</p> <p>Need to tackle income inequality</p> <p>Total failure to deal with in-work poverty, e.g. problems with tax credits system.</p> <p>Tax and benefit policies need to be developed to target those at higher risk of poverty</p> <p>Need consider issue of minimum wage and its ability to impact on poverty</p>	<ul style="list-style-type: none"> ○ Citizens Advice Bureau ○ Equality Commission ○ Institute for Public Health ○ Job assist centre, west Belfast ○ NCH ○ NIAPN ○ NIAPN Belfast workshop 2, 3 ○ NIAPN Derry workshop 2 ○ Sinn Fein/ Craigavon BC
	<p>Does not include any focus on child poverty, no reference to children and young people as a priority group –an unacceptable omission, indicates that less of a priority, considering the high levels of child poverty in NI it is difficult to understand. Note inclusion of new PSI group on lone parents, a similar group for children and young people is notable by its absence.</p>	<ul style="list-style-type: none"> ○ NICCY
SPECIFIC SECTION	6.1	
	<p>Strategic aim should include ‘health’ in the title: “to improve income, health and living conditions of the most disadvantaged”</p>	<ul style="list-style-type: none"> ○ WHSSB

	<p>Strategic aim is weak, does not imply a high level of commitment, suggest 'to eliminate/eradicate poverty and social exclusion and actively promote social inclusion'</p>	<ul style="list-style-type: none"> ○ Belfast Healthy Cities ○ Caroline Murphy ○ Citizens Advice Bureau ○ Communities in Transition ○ Dr Callie Persic ○ Inner city south Belfast SureStart ○ Liam Stone Springfield Development Trust (NIAPN Belfast workshop 1) ○ Martin Flynn ○ NIAPN ○ NIAPN Belfast workshop 1, 3 ○ West Belfast Partnership Board ○ Youthnet
	<p>weakness in the 3 strategic priorities – tend to assume that the problem in dealing with poverty is to focus on those who are experiencing social exclusion, hierarchies in wider society encourage or tolerate inequalities, need to have a more tolerant, cohesive and globally aware society</p>	<ul style="list-style-type: none"> ○ Royal Hospitals
	<p>Outcome focus would promote a partnership approach to working together , promoting the inclusion of all key stakeholders – would ensure APS more meaningful to those living in poverty and would encourage their engagement in the development, implementation and monitoring and review of APS</p> <p>would link to and compliment a life cycle approach to tackling poverty – as adopted by DWP APS</p>	<ul style="list-style-type: none"> ○ CINI

	<p>6.1 emphasis on employment and employability ignores fact that paid employment not always an option, should include measures to reduce social and economic inequalities such as low pay, pensions, benefits levels, health, education, childcare, transport, housing and the environment</p> <p>current benefit allowance also needs to be reviewed – this is particularly important for those unable to take up employment due to illness, disability or caring responsibilities.</p> <p>Issue of ‘working poor’ must be tackled</p> <p>need 4th strategic aim – Promoting Social Inclusion/Tackling Social Exclusion is necessary to fully improve the living conditions of the most disadvantaged</p> <p>Increasing levels of social capital in communities should compliment and assist benefits take-up as well as providing opportunities to lift some people out of poverty</p> <p>Pushing people off benefits does not alleviate the problem as simplistically as the strategy suggests</p> <p>APS ignores the fact that poverty in NI continues to increase for those already on low pay</p> <p>Nature of financial hardship should be categorised as: benefit levels, low pay, ill health, indebtedness, pensions, levels of redistributive tax rates, access to services, esp. in rural areas</p>	<ul style="list-style-type: none"> ○ A&D HAZ ○ Age Concern ○ Belfast City Council ○ Belfast Healthy Cities ○ CCMS ○ Children and Young people in Derry ○ Children’s law centre ○ CINI ○ Citizens advice bureau ○ Communities in transition ○ Craigavon BC ○ EGSA ○ Equality Commission ○ Gingerbread ○ Inner city south Belfast SureStart ○ Job Assist Centre, West Belfast ○ Labour Party ○ NCH ○ NEA ○ NIAPN ○ NIAPN Belfast workshop 2, 3 ○ NIAPN Derry workshop 1, 2 ○ NIAPN Omagh workshop 1 ○ Royal Hospitals ○ Save the Children ○ Sinn Fein/ Craigavon BC ○ Sinn Fein ○ South & East Belfast H&SST ○ West Belfast Economic Forum ○ Youthnet
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	AP forum	
	too late in day to draw this up. Purpose is to oversee implementation of APS - which has been drawn up by government. Will be toothless and have limited impact or access and no ownership of APS	<ul style="list-style-type: none"> ○ Armagh Senior Citizens Forum ○ Help the Aged
	6.4	
	6.4 To state the aim of the strategy is to join up other initiatives is not acceptable given the impact of poverty and social exclusion on the daily lives of people here –(children and young people, disabled people, etc). concerned that issues may be lost as they fall between 2 strategic documents e.g. child poverty – need to be addressed in CYPS but also APS	<ul style="list-style-type: none"> ○ Equality Commission
	6.5 joined up working is in its 14 th year, why has it not worked before, why would it work now? need to have genuinely shared strategic objectives and targets and a collective responsibility to deliver	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 3

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2

SUMMARY OF RESPONSES RELATING TO CHAPTER 7

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Evidence in this section concerning previous impact of skewing is welcome as is reference to skewing of efforts. Look forward to further research in this area, proposes that this research should be linked to proposed development of poverty proofing procedure	<ul style="list-style-type: none"> ○ Labour Party
SPECIFIC SECTION	7.12 needs to be a focus on ‘bending the spending’ as highlighted in DSD Neighbourhood Renewal Strategy	<ul style="list-style-type: none"> ○ WHSSB
	7.7,7.8 – how much of the £48 million DE would have spent whether New TSN was in place or not, also question DHSSPS £214 million example	<ul style="list-style-type: none"> ○ Disability Action
	7.9 departments should automatically put effort into increasing/encouraging accessibility and uptake of key services, and should not need a TSN policy to trigger such effort	<ul style="list-style-type: none"> ○ Disability Action
	7. 11 In general terms support skewing, but concerned about short term funding cycles, the current crisis in the community and voluntary sector illustrates this problem.	<ul style="list-style-type: none"> ○ South East H&SST
	7.11 concerned about skewing, suggest kept under constant review to ensure it is effective and that there are no unintended negative impacts	<ul style="list-style-type: none"> ○ General Teaching Council
	7.11 supports skewing but also would be helpful for dedicated funding to be made available to support innovative scheme or bridge funding to support realignment of existing service provision	<ul style="list-style-type: none"> ○ NHSSB

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	5% of business sector profits to be spend on preventing poverty	<ul style="list-style-type: none"> ○ Children and Young people in Derry
	disappointed that this has not been dealt with in a more comprehensive manner	<ul style="list-style-type: none"> ○ General Teaching Council
	Should include an analysis of government expenditure including spending on infrastructure to ensure balanced towards disadvantaged	<ul style="list-style-type: none"> ○ Job Assist Centre, West Belfast ○ NICVA ○ NCH
	Need resources for disadvantaged areas to build capacity	<ul style="list-style-type: none"> ○ Job Assist Centre, West Belfast
	Needs to address debate on budget allocation on the basis of need versus population size	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 1
	Can we look at the Barnett Formulae for a review of the NI budget, was there any peace dividend to support such proposals	<ul style="list-style-type: none"> ○ NIAPN Omagh workshop 1
	Impact of departmental budget cuts and relationship to TSN, APS	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 2 ○ NIAPN Omagh workshop ○ NIAPN Derry workshop 1
	Concern that budget overspend elsewhere could lead to cuts for community and voluntary sector	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 3
	Resources drive the process with civil service working within existing limitations	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 3
	Consultation doc reflects the considerable debate on this issue. OFMDFM have ignored recommendations made in previous stages of consultation process	<ul style="list-style-type: none"> ○ Save the children
	Long term funding of projects must be secured to ensure continued implementation of serious anti poverty work. Little acknowledgement that short term funding, 3 yearly, is inappropriate, need to allow time for capacity building	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 3 NIAPN Belfast workshop 2

SPECIFIC SECTION	7.6 Difficult to measure how much has been skewed, needs to be transparent,	<ul style="list-style-type: none"> ○ Age Concern ○ NIAPN Belfast workshop 1
	7.11	<ul style="list-style-type: none"> ○
	disagree with proposal to continue skewing must be fully resourced, specific ring-fenced funding for any new TSN/PSI activities not diverting funds from mainstream expenditure	<ul style="list-style-type: none"> ○ Armagh Senior Citizens Forum ○ Belfast City Council ○ Belfast Healthy Cities ○ Caroline Murphy ○ CCMS ○ Children’s law centre ○ CINI ○ Communities in Transition ○ Disability Action ○ Dr Callie Persic ○ Equality Commission ○ Gingerbread ○ Help the Aged ○ Inner city south Belfast SureStart ○ Institute for Public Health Save the children ○ Martin Flynn ○ NCH ○ NIAPN ○ NIAPN Belfast workshop 1 ○ NIAPN Belfast workshop 2 ○ NIAPN Derry workshop 1 ○ NIAPN Omagh workshop 1 ○ NIAPN workshops ○ NICCY ○ RCN ○ Save the children ○ Sinn Fein ○ Sinn Fein/ Craigavon BC ○ South Antrim rural community network ○ West Belfast Partnership Board ○ Youthnet

	<p>UNCRC 2002 UK implementation report was concerned that the Convention is not implemented to the maximum extent of available resources- despite the concern, skewing continues. Depts are already under pressure, piecemeal way in which even basic services are funded indicates that there is little enough in the system</p>	<ul style="list-style-type: none"> ○ NICCY
	<p>Skewing should only be used when shown to be effective</p> <p>Previous research indicates anti-poverty and social exclusion programmes best served by specific funds</p>	<ul style="list-style-type: none"> ○ A&D HAZ ○ Antrim Borough Council ○ Belfast City Council
	<p>Concerned about skewing resources, little evidence that this has reduced poverty</p> <p>Skewing approach has not worked, this highlighted by external evaluation, creates lack of transparency, not applied in systematic fashion, no proposals to analyse budget allocation within departments</p>	<ul style="list-style-type: none"> ○ Belfast Healthy Cities ○ Caroline Murphy ○ Causeway H&SST ○ Dr Callie Persic ○ Inner city south Belfast SureStart ○ Labour Party ○ Martin Flynn ○ NIAPN Belfast workshop 1, 2 ○ NIAPN Derry workshop 1, 2 ○ West Belfast Partnership Board ○ Youthnet
	<p>Systems must be out in place to test effectiveness of spending, reported on regularly at APF</p> <p>Need information on what are its effects? Impact on displacing funds from other budgets?</p>	<ul style="list-style-type: none"> ○ CCMS ○ CINI ○ NIAPN Belfast workshop 3 ○ NIAPN Derry workshop 2 ○ Save the children
	<p>Dormant accounts (Pathways for Change) with additional support from government depts should be made available to fund anti-poverty work in the community and voluntary sector</p>	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 1

	<p>7.11 understand rationale for skewing, but this is another case of doing what has always been done and expecting different results –it is crisis management which meets the crisis for those experiencing the problem now but does not stop others falling into crisis and so the problem perpetuates and the overall aim is never achieved.</p> <p>By skewing resources towards certain groups and communities we are in danger of allowing the next poorest 10% of groups and communities to reach crisis point before we begin to tackle the problems for them – truly tackling poverty and social exclusion requires a concerted effort to identify the causes, making changes across the board, will take sustained effort and structural change to eliminate the problem for everyone</p>	<ul style="list-style-type: none"> ○ NEA
	<p>need resources to tackle poverty including benefits and services targeted at children and young people</p>	<ul style="list-style-type: none"> ○ Derry Children’s Commission
	<p>The proposed zones for health and educations trusts and councils was a logical framework for allocation of resources on a geographic basis providing the resources are available for skewing/targeting</p>	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2

SUMMARY OF RESPONSES RELATING TO CHAPTER 8

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	initiatives identified in this section are particularly welcomed as they should ensure both high level political and operational accountability for APS	<ul style="list-style-type: none"> ○ General Teaching Council
	Role of CAPU will be of strategic importance, it must be proactive to ensure all gov depts pursue their responsibilities with energy and commitment.	<ul style="list-style-type: none"> ○ General Teaching Council
	Proposals for implementation are clear but do not include information on role of other organisations and sectors nor information about how the APS will be evaluated	<ul style="list-style-type: none"> ○ Labour Party
	Concerned about community planning proposals within RPA and its relationship to new TSN	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 1
	Delivery mechanisms should be outlined clearly	<ul style="list-style-type: none"> ○ NIAPN Omagh workshop 1
SPECIFIC SECTION	8.4 Ensure implementation in local communities and local government agencies to be made easier, opportunities within Investing for Health and Neighbourhood Renewal	<ul style="list-style-type: none"> ○ WHSSB

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Impact of RPA not considered	<ul style="list-style-type: none"> ○ A&D HAZ
	Timetable is unrealistic and incomplete as it does not go beyond 2005	<ul style="list-style-type: none"> ○ Labour Party

	<p>Must contain detailed timeframe What period will it cover? Should be 10 years, mid term review? When will first RAP be out to consultation? When will it be published? Will it be reported upon annually? Should be ongoing monitoring Need to allow further time to publish APS</p>	<ul style="list-style-type: none"> ○ Save the children
	<p>Charities and NGO's should do quarterly review and comment on strategy</p>	<ul style="list-style-type: none"> ○ NIAPN Omagh workshop 1
	<p>No clear framework to accommodate community involvement in this policy area given current state of community relations this could have a negative impact in programme delivery within and between communities</p>	<ul style="list-style-type: none"> ○ Antrim Borough Council
SPECIFIC SECTION	<p>8.2 Ministerial Forum not enough to ensure leadership, coordination and monitoring of strategy, need strategic tier and operational tier to ensure joint departmental implementation with reporting systems in place and effective representation from key stakeholders and decision makers</p>	<ul style="list-style-type: none"> ○ A&D HAZ
	<p>8.6 publishing strategy in September 2005 – too rushed, spend time getting right strategy and drop ambition to influence 2005/2006 spending decisions</p>	<ul style="list-style-type: none"> ○ Belfast Healthy Cities
	<p>Need a clear implementation framework, baseline indicators and incremental targets for the achievement of strategic goals</p>	<ul style="list-style-type: none"> ○ Sinn Fein

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2

SUMMARY OF RESPONSES RELATING TO CHAPTER 9

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Positive development – development of targets and associated indicators	<ul style="list-style-type: none"> ○ NI Legal Services Commission
	provides a useful guide and insight into how targets will be set and monitored, important that target at each level are outcome targets and that they are referenced back to the accountability processes.	<ul style="list-style-type: none"> ○ General Teaching Council
	Appreciate that no specific targets can be set at this time but would stress our concern that the specific needs of rural dwellers and those involved in the fishing industry should be reflected in targets set and processes established to monitor these targets	<ul style="list-style-type: none"> ○ Southern Investing for Health Partnership
	Welcomes introduction of targets, but need more detail, should be quantified and time based, include who cannot take up employment, societal impact should be included	<ul style="list-style-type: none"> ○ Belfast Healthy Cities
	GIS and location based services (LBS) relevant to information communication technology- can be exploited further. Development of the National Mapping Agreement will facilitate use of Noble and support the analysis and management of APS, further possible developments such as the Geographic Information Hub will help in the physical sharing of data across public sector as a whole as well as private and voluntary sectors and will allow for more effective targeting of social need	<ul style="list-style-type: none"> ○ OSNI
	Proposed to develop a broader range of indicators to monitor progress in addition to those used for targeting. This is rather confusing and could be clearer. What is the difference between these two, is there a danger of over-complicating the process?	<ul style="list-style-type: none"> ○ South East H&SST
	May be useful to compare high level targets with other UK jurisdictions, with Irish and other EU countries	<ul style="list-style-type: none"> ○ Labour Party

	Targets should be set out clearly in the RAP	○ NIAPN Omagh workshop 1
	Developing indicators for APS needs to be done in Partnership and consultation with NGO's and other experts	○ NIAPN Omagh workshop 1
	M&E and who does this is extremely important	○ NIAPN Omagh workshop 1
	Targets must aim to reduce levels of poverty and social exclusion	○ NIAPN Omagh workshop 1
SPECIFIC SECTION	9.4 Document notes the difficulty in measuring poverty, shies away from a single high level poverty target – missed opportunity, opts for 4 approaches to poverty measurement but more work is needed to refine targets	○ South East H&SST
	9.5 Measuring poverty – poor health should be a key indicator	○ WHSSB
	9.6 Welcomes the particular emphasis within 4 targets of 3 household types these play significant part of the Trusts work, would be interested in contributing further to the refinement of these targets	○ South East H&SST
	9.8 welcome use of indicators but could be given a much bigger role in measuring progress	○ Belfast Healthy Cities
	9.9 Outline of 8 supporting targets, 3 objectives areas, matrix of 9 distinct objective areas – low and mid level targets/ objectives – there is a danger if developing an overcomplicated approach with too many objectives and targets	○ South East H&SST
	9.11 Trust notes building capacity target in terms of health inequalities - this is a challenging target, will need full co-operation of all depts and the government if it is to be achieved	○ South East H&SST
	9.11, 9.12 Welcomes proposed targets relating to reducing level of long standing limiting illness, improving educational attainment	○ Belfast Healthy Cities
	9.18 may not be possible to be explicit about targets at mid level at this stage – but these should be clearly mapped into the framework.	○ CCMS

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Access to services, mobility, mortality and links to social exclusions to be given equal weight	<ul style="list-style-type: none"> ○ WHSSB
	Language and system of targets should be simplified to only talk about long, mid and short term targets	<ul style="list-style-type: none"> ○ Belfast Healthy Cities
	The key strategic aim should be to reduce poverty, clearly defined by a % within realistic, ambitious timescale.	<ul style="list-style-type: none"> ○ Equality Commission
	Consideration should also be given to qualitative data, perhaps by use of pilot approach take in new TSN evaluation, where social capital model could also be used	<ul style="list-style-type: none"> ○ South East H&SST
	Highlights the need to take time to set specific, measurable, realistic targets reflecting the complexity and diversity of poverty and its impact on people	<ul style="list-style-type: none"> ○ Southern Investing for Health Partnership
	This section presented more clearly in annex 2 of phase 1 doc., although baseline figures in Table 2 are useful; Should contain proposal for more definite high level specific targets	<ul style="list-style-type: none"> ○ Labour party
	mention of debt within the indicators proposed to measure and monitor poverty and social exclusion	<ul style="list-style-type: none"> ○ Ms McGinty Ballymacgroarty WHAZ (NIAPN Derry workshop 1)
	Need to include qualitative indicators	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1 ○ General Teaching Council
	Socio-economic indicators need to be more comprehensive	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1
	Lack of joined up approach in developing indicators with Investing for Health and Children and Young persons strategy	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1
	Do not necessarily need more indicators but need collaborative agreement on indicators and base level targets to be used	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1
	Targets should not just be about measuring government objectives	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1

	Who will monitor and evaluate the APS? Lack of transparency about getting involved in such a process	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1 ○ Jim Nolan, Enniskillen Together (NIAPN Omagh workshop 1)
	Should be additional local workshops on proposed indicators	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1) (NIAPN Derry workshop 2
	Vigorous monitoring system should be established to ensure strategy remains on track	<ul style="list-style-type: none"> ○ Caroline Murphy ○ Dr Callie Persic ○ Martin Flynn ○ West Belfast Partnership Board
	Measurements of disadvantage and the identification of the 3 target groups (individual, areas and communities and vulnerable groups) need to be improved. Need robust and transparent mechanism for determining who fits into this category	<ul style="list-style-type: none"> ○ Communities in Transition
	Data readily available on social exclusion and financial/material poverty of many lone parents – but data is not so readily available on other communities of interest	<ul style="list-style-type: none"> ○ Communities in Transition

	<p>Strategy not complete without smart objectives, targets and action plans with achievable timescales to ensure successful implementation</p> <p>Targets have to be clear, should be applied to all relevant depts so that they have a collective responsibility to deliver and cannot pass it between each other</p> <p>Need demonstration of how APS will work in practice with demonstrable indicators and methods of measurement</p> <p>Those involved in service delivery are required by government to monitoring and report on targets and timescales - it is both unreasonable and illogical that the policy basis for such activities should not adopt the same stringent approach to monitoring and evaluating its effectiveness.</p>	<ul style="list-style-type: none"> ○ Age concern ○ A&D HAZ ○ Antrim Borough Council ○ Armagh Senior Citizens Forum ○ Belfast City Council ○ Caroline Murphy ○ Citizens advice bureau ○ Communities in Transition ○ Dr Callie Persic ○ Equality Commission ○ Frances McCandless NICVA (NIAPN Belfast workshop 1) ○ Help the Aged Inner city south Belfast SureStart ○ Job Assist Centre, West Belfast ○ Lenadoon Community Forum ○ Liam Stone Springfield Development Trust) (NIAPN Belfast workshop 1) ○ Martin Flynn ○ NEA ○ NIAPN ○ NIAPN Belfast workshop 1, 2, 3 ○ NIAPN Derry workshop 2 ○ Save the Children ○ West Belfast Economic Forum ○ West Belfast Partnership Board ○ Youth@clc
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	<p>Targets should include:</p> <p>Measurements of social capital</p> <p>indicators that reflect child and adult poverty, measurable targets</p> <p>persons or community's quality of life</p> <p>Need rural proofing indicators and area identification that moves beyond the shortcomings of the current Noble index</p> <p>clarify and set a target for child poverty</p> <p>should reflect measures between poor and non poor families – linked to CYP strategy</p> <p>Should represent positive and negative aspects of children's lives, incorporate range of rights in UNCRC as well as multi dimensional nature of child well-being</p> <p>should take account of nutrition, infant mortality, safe play areas, 16-18 year olds not in training, employment or at school, homeless people etc.</p> <p>capture the extent and impact of poverty on children and adults with a learning disability and their families</p> <p>Take account of communities that exist along border line measurement – may not be labelled as poverty areas but suffer inequity as result of policies</p> <p>Account should be taken of soft skills not just those concerned with educational attainment. Rates for reducing truancy and exclusion should be included</p> <p>Look at work carried out on indicators by groups such as Belfast Healthy Cities</p>	<ul style="list-style-type: none"> ○ CCMS ○ CINI ○ Communities in Transition ○ Derry Children's Commission ○ MENCAP ○ NIAPN Belfast workshop 1, 2 ○ NIAPN Derry workshop 1 ○ NICCY ○ RCN ○ Save the children ○ South Antrim rural community network ○ WHSSB ○ West Belfast Partnership Board
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	Need to develop comprehensive set of indicators, those in annex 5 are extremely limited and not specifically targeted at deprived groups – we seek assurances that these are not reflective of indicators for APS	<ul style="list-style-type: none"> ○ Save the children
	As result of piecemeal approach in general, targets listed are too vague Needs to be a holistic linked approach to ensure strategy is measurable in terms of effectiveness	<ul style="list-style-type: none"> ○ NICCY
	The different levels of targets setting can only serve to distort the overall focus	<ul style="list-style-type: none"> ○ CINI
	Sanctions should be applied if targets not met	<ul style="list-style-type: none"> ○ Caroline Murphy ○ Dr Callie Persic ○ Martin Flynn ○ West Belfast Economic Forum
	High level targets do not reflect strategic aim of building capacity, nor broader elements of social exclusion	<ul style="list-style-type: none"> ○ CCMS
SPECIFIC SECTION	9.5 Table 1 no explanation of why median income based indicators are used and not mean income levels ('Bare Necessities' report made use of both) – as well as adopting consensual poverty indicators it would be reasonable to include both median and mean income based indicators even if it will be more challenging to meet targets.	<ul style="list-style-type: none"> ○ Royal Hospitals
	9.9 too much emphasis on employability, ignores low paid jobs, minimum wage is not enough, does not tackle poverty amongst pensioners and other economically inactive households	<ul style="list-style-type: none"> ○ NEA
	9.9 Definition of financial hardship is unclear, usually means a lack of income to cover basic living expenses - but in APS seems to refer to where families have little or no access to financial services –those in poverty are at higher risk of being having to use higher interest rates. Key to dealing with financial hardship is adequate income.	<ul style="list-style-type: none"> ○ NEA

	9.10 it is unclear why need to increase proportion of employees in Standard Occupational Classification groups 1 to 3 – it is necessary in society for people to work in many types of jobs, but those jobs should not be allowed to lead to poverty or social exclusion.	<ul style="list-style-type: none"> ○ Royal Hospitals
	9.12 concerned that there is only 1 target specified in relation to education	<ul style="list-style-type: none"> ○ CCMS
	9.9 -9.17 – disappointed and concerned that the supporting targets underpinning the strategic targets contain no reference to people with disabilities – in our view target on health does not relate to disability	<ul style="list-style-type: none"> ○ Disability Action
	9.19 disagree that mid level targets cannot be set as this stage	<ul style="list-style-type: none"> ○ Belfast Healthy Cities ○ NEA
	9.22 halving child poverty by 2010 is too easy a target. Does this mean focusing upon easier to reach groups?	<ul style="list-style-type: none"> ○ Lisa King Equality Commission) (NIAPN Belfast workshop 1)

	<p>9.22 Doc is too suggestive and not directive enough, targets need to be set and depts deliver on them, not the other way round – if this suggestive approach remains there is concern that depts will not take APS as seriously as they should</p> <p>Targets should be agreed through consultation process, should be supported by groups with specific expertise in areas such as health, housing, education and include community and voluntary sectors</p> <p>Children and young people should be consulted on indicators</p> <p>System for monitoring and implementation should be transparent and resourced</p> <p>Need for clarity on monitoring and evaluation – consultees to be actively involved in these processes</p> <p>appears that Government will be setting the boundaries, that strategy not developed from ‘the bottom-up’, against the spirit of NAPS. need to set targets first then allocate resources,- otherwise targets become secondary to the activities depts define for themselves, the important decisions have already been made and consultation is futile</p>	<ul style="list-style-type: none"> ○ Children’s law centre ○ CINI ○ Frances McCandless NICVA) (NIAPN Belfast workshop 1) ○ Gingerbread ○ Institute for Public Health ○ MENCAP ○ NEA ○ NIAPN ○ NIAPN Belfast workshop 2 , 3 ○ NIAPN Derry workshop 2 ○ NIAPN Omagh workshop 1 ○ Save the Children
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ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2

SUMMARY OF RESPONSES RELATING TO ANNEX 1

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
	Welcomes proposed vision, suggests vision should be at head of strategy not in annex	<ul style="list-style-type: none"> ○ Belfast Healthy Cities ○ Caroline Murphy ○ Citizens advice bureau ○ Dr Callie Persic ○ Gingerbread ○ Martin Flynn NIAPN Belfast workshop 3
	Welcomes proposed vision	○ NIAPN
	Vision should not be constrained by existing resources – this will restrict potential to make a real change	○ Belfast Healthy Cities
	Vision should not be in annex, should aim towards elimination of poverty not to settle for a society ‘which aims to enable citizens to be free from poverty’	<ul style="list-style-type: none"> ○ Royal Hospitals ○ West Belfast Partnership Board
	Not sure if vision is the right one for a way forward ()	○ NIAPN Omagh workshop 1
	Where is the vision? This does not feel as if its has a new real vision	○ NIAPN Belfast workshop 3
	Agree with sentiment of the vision, but this is not a vision, should not be constrained by fears of budgetary consequences nor the practicalities if tackling the problems – but should be an ‘ideal-world view’	○ NEA
	New vision only in annex. Words should be changed to ‘the development of a society which enables...’	<ul style="list-style-type: none"> ○ CINI ○ Save the children ○ NIAPN Derry workshop 1

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Number of serious issues raised in annex 1. some ‘responses’ do not do justice to the importance of the issues. There is a need to understand potential impact of Treasury decisions on poverty levels in NI rather than simply treat the Treasury as a force majeure.	Royal Hospitals

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2

SUMMARY OF RESPONSES RELATING TO ANNEX 2

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Noted that TOR include commitment to monitor and review success of the strategy, particularly in relation to PSI and the working group on lone parents, contend that this function should be broadened to include monitoring of S75 impacts at a strategic level	CCMS
SPECIFIC SECTION		

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	.	
SPECIFIC SECTION		

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2
SUMMARY OF RESPONSES RELATING TO ANNEX 3

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	None specific	
SPECIFIC SECTION		

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	.none specific	
SPECIFIC SECTION		

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2
SUMMARY OF RESPONSES RELATING TO ANNEX 4

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	Look like RAP not published till December 2006 – concerned about loss of momentum by the length of the wait for publication of targets	Southern H&SSB
SPECIFIC SECTION		

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	None specific	
SPECIFIC SECTION		

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2
SUMMARY OF RESPONSES RELATING TO ANNEX 5

THOSE FOR APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	None specific	
SPECIFIC SECTION		

THOSE AGAINST APPROACH:

	COMMENTS	ORGANISATION
CHAPTER OVERALL	None specific	
SPECIFIC SECTION		

ANTI POVERTY STRATEGY – CONSULTATION DOCUMENT – PHASE 2

SUMMARY OF RESPONSES RELATING TO EQUALITY

SPECIFIC EQUALITY ISSUE QUESTIONS POSED IN CONSULTATION DOCUMENT	COMMENTS RECEIVED	
Is there any other data/info that should be taken into account concerning s75 (1) equality issues in relation to this strategy?	Trusts and other agencies collect significant data on S75 groups, APS could encourage greater sharing of this data and more proactive use of it	<ul style="list-style-type: none"> ○ South & East H&SST
	Need for a geographical location element linked to S75	<ul style="list-style-type: none"> ○ South Antrim rural community network ○ RCN
Could the proposals impact on any of the groups within s75 of the NI Act in a way not identified. If so, how?		
Taking account of existing legislation, are there any alternative approaches to tackling poverty and social exclusion in a more equality-friendly way? If so, what are they?		

Any other comments on equality issues raised in that Chapter?	Accepts that it is not possible to undertake EQIA of high level strategies	<ul style="list-style-type: none"> ○ Southern H&SSB
	11.5 do not accept that APS is too high level to have full EQIA. This is breach of statutory duty under S75 NI Act 1998. This is unacceptable. An attempt to evade legislative responsibilities.	<ul style="list-style-type: none"> ○ Cathy Stanton Sinn Fein) (NIAPN Belfast NIAPN Belfast workshop 3workshop 1) ○ CCMS ○ Children law centre Caroline Murphy ○ CINI ○ Disability Action ○ Dr Callie Persic ○ Gingerbread ○ Job Assist Centre, West Belfast ○ Lenadoon Community Forum ○ Martin Flynn ○ NIAPN ○ NIAPN Belfast workshop 1 ○ NIAPN workshops ○ NICCY ○ Save the children ○ West Belfast Economic Forum ○ West Belfast Partnership Board
	11. 5 Rejects the view that NICS cannot assess high level strategies for equality, recognise that it is a challenge to do full EQIA but that expect to see evidence of EQIA – would like to see annual report on the monitoring of New TSN as per stage 7 of the EQIA process, has implications for equality issues at lower policy levels	<ul style="list-style-type: none"> ○ Equality Commission
	11.6 no reference is made to needs of people with multiple identity and how the impact of the policy on them will be proofed	Disability Action
	Should be a new S75 category to deal with poverty and social exclusion	NIAPN Belfast workshop 1
	S75 categories need to be reviewed, ex-prisoners and those	NIAPN Belfast workshop 3

	with convictions faced barriers to advancement access to employment and financial services	
	S75 definitions too narrow, need to be revised	NIAPN Derry workshop 2
	S75 groups should be sub-divided to reflect diversity of children and young people	Save the children CINI
	S75 categories can place limitations on work – e.g. can be S75 group but live in non TSN area	NIAPN Belfast workshop 3
+ All Departments are required to poverty, gender and rural proof new / emerging strategies / policies.	benefit levels should be poverty proofed	Age Concern
	Need for rural proofing indicators and area identification that moves beyond the shortcomings of the current Noble index	RCN
	Need clarity on how APU will poverty and gender proof all policies	NIAPN
	All government policies should be poverty proofed	NIAPN Belfast workshop 3

ANY OTHER ISSUES RELATING TO POVERTY & SOCIAL EXCLUSION THAT SHOULD BE CONSIDERED IN BRINGING FORWARD AN ANTI POVERTY STRATEGY FOR NORTHERN IRELAND?		
ISSUE	COMMENTS	
	APS should lobby government on its commitments under United nations Charter on Rights for Children	<ul style="list-style-type: none"> ○ Children's law centre
	APS needs to be the key strategy that informs and directs all other strategies	<ul style="list-style-type: none"> ○ NIAPN
	To ensure anti poverty policy is at the heart of government the strategy needs to establish a statutory committee, an all party departmental review group on poverty, social exclusion and social inclusion	<ul style="list-style-type: none"> ○ NIAPN
	Consideration of NI's role in influencing the key levers of social policy: taxation and benefits, national minimum wage, recognition that NI compared with GB low level of wages in the private sector	<ul style="list-style-type: none"> ○ NICVA ○ NCH ○ Job Assist Centre, West Belfast
	Rebalance rates, those who can pay more, poor pay less, claw back some of gains made by the well off in rises in property prices	<ul style="list-style-type: none"> ○ NICVA ○ NCH ○ Job Assist Centre, West Belfast
	Examine the high level of economic inactivity in NI,	<ul style="list-style-type: none"> ○ NICVA ○ NCH ○ Job Assist Centre, West Belfast
	Recent economic vision and supporting framework from DETI and economic development forum provide this kind of overall structure – but this is not what is on offer in APS	<ul style="list-style-type: none"> ○ NICVA ○ NCH ○ Job Assist Centre, West Belfast
	examination should be undertaken of the profile and quality of paid work	<ul style="list-style-type: none"> ○ Equality Commission
	How does APS sit with increased rates and water charges?	<ul style="list-style-type: none"> ○ Caroline Murphy ○ Dr Callie Persic ○ Martin Flynn ○ West Belfast Partnership Board ○ NIAPN Belfast workshop 3 ○ Gordon Hewitt NIAPN

CONSULTATION PROCESS	
<p>Timescale too rushed</p> <p>Closing date for responses should have been extended</p> <p>Consultation over summer period should be avoided</p> <p>Lack of effective, well timed, wide scale consultative events excluded many from engaging in the process</p> <p>Timescale of process and time period inferred no real willingness to engage, many decision had already been taken</p>	<ul style="list-style-type: none"> ○ Age concern ○ Belfast Healthy Cities NIAPN Belfast workshop 1 ○ Save the Children ○ Lenadoon Community Forum Belfast Healthy Cities ○ NIAPN Omagh workshop 1 ○ Save the Children ○ NIAPN Derry workshop 1 ○ NIAPN Derry workshop 1
<p>disappointed with outcome of consultation process, little consideration given to submission</p> <p>would like to see real and open discussions with all involved, can facilitate in tandem with OFMDFM an engagement process</p> <p>Little substantive change from phase 1 document, little evidence of learning from responses to first phase</p> <p>Call on Minister Rooker to call together round table of representatives from Age sector, community voluntary and gov. depts to discuss the way forward in developing and agreed APS</p>	<ul style="list-style-type: none"> ○ Help the Aged Armagh Senior Citizens Forum Lenadoon Community Forum ○ NIACRO West Belfast Economic Forum ○ NIAPN Belfast workshop 2 ○ North West Belfast HAZ ○ Save the children
<p>have serious reservations about the process to date, views and concerns of the community and voluntary sector not reflected in the document Process is lip-service, no real intention to develop a strategy based on what is said at consultative events</p>	<ul style="list-style-type: none"> ○ Armagh Senior Citizens Forum ○ Help the Aged ○ NIAPN Derry workshop 1 ○ Save the children
<p>Structures for consultation inappropriate –little engagement with children, single families and other vulnerable groups</p>	<ul style="list-style-type: none"> ○ NIAPN Belfast workshop 2
<p>Lack of consultation with children and young people-contravention of S75 and article 12 of UNCRC – should have been proactive</p> <p>Late into consultation produced young persons version of APS doc</p> <p>This is wholly inadequate response from OFMDFM, have a statutory responsibility to pro-actively consult with children and young people</p>	<ul style="list-style-type: none"> ○ Save the children ○ CINI ○ NICCY

Public events have been conducted but tend to be attended by activities, this may skew results, so would like to see multitude of approaches	<ul style="list-style-type: none"> ○ NEA
Need information on when and how APS will be finalised Phase III doc must be consulted upon publicly	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1, 2 ○ NIAPN Omagh workshop
Consultations should be carried out with communities, in schools, colleges, employment training programmes, churches, in rural areas, doctor's waiting rooms, to ensure the most vulnerable and most excluded are actively consulted.	<ul style="list-style-type: none"> ○ NEA
Would like feedback on submission How will responses be collated? How will submissions be weighted? Seek assurance that method of analysis will not be repeated – counting of number of responses for or against Seek confirmation that where a response endorsed by a number of groups this will be reflected in the analysis Would like copy of analysis once completed NICVA submission at phase 1 included over 160 signatures, this was not reflected in analysis by OFMDFM	<ul style="list-style-type: none"> ○ Frances McCandless NICVA (NIAPN Belfast workshop 1) ○ NIAPN workshops ○ Save the children ○ Children's Law Centre
All responses to phase 1 not on new TSN website Second phase doc claims first phase resulted in broad support for strategy, but unable to verify this independently Tabular summary of responses on web is useful but would like to see original docs Fact that 'independent comments' appear on the website gives impression that there was a hierarchy of consultation, 4 invited responses were take seriously, 103 others were not, impression is reinforced by sketchy and inadequate response to issues raised at phase 1 consultation that appears in annex 1 of phase 2 doc Question the usefulness of another round of	<ul style="list-style-type: none"> ○ Labour Party

consultation as there are very few changes to proposal set out at phase 1, very little can be said about the small amount of new material in the phase 2 doc – further round of consultation slows down the adoption of the strategy and its implementation	
Social Partnership model should have been used to conduct consultation	<ul style="list-style-type: none"> ○ NIAPN Derry workshop 1
Model used by Human Rights Commission for consultation on a bill of Rights – would be a good basis for consultation on APS, urge OFMDFM to mobilise all actors	<ul style="list-style-type: none"> ○ NEA