

# Summary Report of Responses to Phase 2 Consultation of New TSN

Dr Lisa O'Malley  
Department of Social Policy and Social Work  
University of York  
Heslington  
York YO10 5DD  
United Kingdom

Email: [ljg104@york.ac.uk](mailto:ljg104@york.ac.uk)

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## Contents

	Page
List of Tables	3
Introduction	4
Stakeholder responses	4
Structure of the report	6
Section 1: General Comments on the Anti-Poverty Strategy	9
Section 2: The Strategic Aim	11
Section 3: The Analysis and Definition of Poverty	12
Section 4: Targets, Indicators and Action Plans	17
Section 5: Delivery, Implementation and Evaluation	19
Concluding comments	21
Appendix A: List of respondents	22

## List of Tables

		Page
Table 1:	Responses according to organisational type/sector	4
Table 2:	Multiple responses	5
Table 3:	Summary of findings and recommendations by organisational type/sector	7-8

## Introduction

This report summarises responses to the Government Consultation document on the New TSN hereafter referred to as the Anti-Poverty Strategy (APS).

The document did not pose any specific questions, except those relating to equality issues (see section 1.4).

Four organisations expressed dissatisfaction with the timescale for the consultation. The Northern Ireland Labour Forum specifically criticised the lack of public accessibility to phase 1 consultation responses, whilst the inclusion of independent comments on the website inferred that some responses were taken more seriously than others.

Thirteen organisations were of the view that their comments at the phase 1 consultation had not been taken into account in this second draft and question whether the second draft contains very much that is new. Consequently many of the responses are generally negative, and a number reject the current version of the strategy outright. It is possible that the latter view is affected by a sense that earlier consultations have been ignored.

## Stakeholder responses

A total of 60 responses were received and analysed. A list of all respondents is provided in Annex A. An overview of the responses by sectoral 'type' is offered in table 1 below.

Table 1: Responses according to organisational type/sector

Type	Definition	Number of responses (N=60)
<b>VCS: Voluntary/community sector organisations</b>	Includes charitable organisations and NGOs	28
<b>Statutory</b>	Includes NDPBs	16
<b>Local Authorities</b>		3
<b>Partnership Organisations</b>	Organisations such as Sure Start and HAZ which are predicated on the assumption of partnership between different kinds of organisations	6
<b>Other</b>	Individuals (3) Political parties (2) Professional bodies (1) Private sector (1)	7

A number of identical responses were submitted by different organisations. These are all counted individually in the analysis.

Seven responses were submitted on behalf of a number of organisations. The most significant of these is the response from NICVO which is signed by over 200 voluntary groups. Despite a number of organisations' concerns over the 'weighting' of responses, it is not possible to do so with this type of analysis. Where appropriate attention is drawn to findings/recommendations that are supported by these 7 responses. For the purposes of clarity these are called 'multiple responses' (in that they refer to a multiple of respondents). Table 2 includes details of those referred to in the text as 'multiple responses'.

Table 2: Multiple responses

<b>Identifying number</b>	<b>Name</b>	<b>Type</b>	<b>Number of organisations/individuals represented</b>
11	Children and Young People in Derry	VCS – workshop event	Not specified
33	NIAPN	VCS – consultation events	Not specified
37	NIAPN	VCS – consultation event	Not specified
38	NIAPN	VCS – consultation event	Not specified
39	NIAPN	VCS – consultation event	Not specified
40	NICVA	VCS (umbrella)	217 organisations counter-signed report

Whilst the above information might be used to generate some view over the relative weight that might be accorded to some responses, it should be acknowledged that many other organisations are also 'umbrella' groups to some extent, but the lack of detail in their submission regarding the numbers of other organisations consulted or agreeing with their submission makes it impossible to include them as 'multiple responses' in this report.

The issue of weighting of responses also needs to take into account the quality of response. Some organisations have submitted lengthy, well crafted documents that are worthy of closer inspection such as Save the Children, and the NIAPN workshops; whilst others have produced short summaries of key points that are useful for the purposes of broad consultation but are less helpful in developing key points in more detail.

Furthermore the author would like to draw attention to the lack of specific consultation questions for phase 2. This places serious limitations on the quality of the analysis since it cannot be assumed that a 'non-response' has any significance. Similarly the number of responses relating to a particular issue cannot necessarily be taken to reflect any degree of prioritisation, beyond the very broad interpretation that is offered here.

A number of respondents resubmitted their response to the phase 1 consultation and these have been dealt with as follows:

- Where the resubmitted phase 1 response is the only response to phase 2 it has been included.
- Where the resubmitted phase 1 response is appended to specific responses to phase 2 only the latter have been included.

### **Structure of the report**

Table 3 (page 7-8) lists all the key findings and recommendations with the number of responses commenting on the issue and a breakdown by organisation/sectoral type. Throughout the narrative that follows reference is made to the detail contained within this table.

The report is structured around 5 main themes:

1. The development of the APS
2. The strategic aim of the APS
3. Analysis and definition of poverty
4. Targets, indicators and action plans
5. Delivery, implementation and evaluation

Each section begins with an overview of the main findings/recommendations and goes on to detail the responses in full. Each finding/recommendation is replicated in Table 3.

Table 3: Summary of findings and recommendations by organisational type/sector

<b>Finding/Recommendation</b>	<b>Number of responses (N=60)</b>	<b>VCS (N=28)</b>	<b>Statutory (N=16)</b>	<b>Local Authority (N=3)</b>	<b>Partnership Organisations (N=6)</b>	<b>Other (N=7)</b>
1.1 Support for the focus on outcomes rather than process	8 (13%)	0	4 (25%)	2 (67%)	2 (33%)	0
1.2 Clarification is required regarding the role of the APS in relation to wider government policy	13 (22%)	7 (25%)	2 (13%)	0	1 (17%)	3 (43%)
1.3 The need for greater community involvement and ownership of the strategy	5 (8%)	4 (14%)	0	1 (33%)	0	0
1.4 The strategy should be subject to full EIA	18 (30%)	10 (36%)	3 (19%)	0	1 (17%)	4 (57%)
2.1 The strategic aim should be the eradication of poverty and social exclusion	13 (22%)	5 (18%)	2 (13%)	0	3 (50%)	3 (43%)
2.2 The strategic aim should include specific social issues	6 (10%)	4 (14%)	1 (6%)	0	0	1 (14%)
3.1 The strategy needs to be based on a wider analysis of poverty and social exclusion to develop a clear and agreed definition from which to operate	35 (58%)	20 (71%)	8 (50%)	0	3 (50%)	4 (57%)
3.2 The strategy should focus on the needs of those who are full time carers and others who are unable to work	27 (45%)	15 (54%)	4 (25%)	0	2 (33%)	6 (86%)
3.3 The strategy needs a focus on the working poor and in work poverty	25 (42%)	11 (39%)	6 (38%)	1 (33%)	3 (50%)	4 (57%)
3.4 The strategy needs a focus on the social aspects of poverty	26 (43%)	13 (46%)	6 (38%)	1 (33%)	2 (33%)	4 (57%)
3.5 The strategy must include reference to child poverty	22 (37%)	11 (39%)	4 (25%)	0	3 (50%)	4 (57%)

3.6 The strategy should include reference to the link between poverty and conflict	17 (28%)	7 (25%)	4 (25%)	1 (33%)	1 (17%)	4 (57%)
3.7 The strategy should focus on rural poverty	17 (28%)	8 (29%)	2 (13%)	1 (33%)	3 (50%)	3 (43%)
3.8 The strategy should include a focus on older people	9 (15%)	5 (18%)	2 (13%)	1 (33%)	0	1 (14%)
3.9 The strategy should have a greater focus on the needs of disabled people	6 (10%)	3 (11%)	2 (13%)	0	1 (17%)	0
4.1 The strategy should specify measurable, time-based actions and targets	27 (45%)	11 (39%)	6 (38%)	3 (100%)	3 (50%)	3 (43%)
4.2 Ministers should set targets, not departments	10 (17%)	6 (21%)	0	0	1 (17%)	3 (43%)
4.3 The use of specific indicators is required	6 (10%)	4 (14%)	2 (13%)	0	0	0
4.4 There should be greater consultation over proposed targets	4 (7%)	3 (11%)	1 (6%)	0	0	0
5.1 The APS should be funded via a dedicated budget. The skewing of resources is not supported	39 (65%)	21 (75%)	7 (44%)	3 (100%)	3 (50%)	5 (71%)
5.2 The development of a ministerial forum is welcomed, but clarity of function, responsibilities and powers is required along with wider representation	36 (60%)	16 (57%)	8 (50%)	3 (100%)	4 (67%)	5 (71%)
5.3 Ensuring the APS provides an inclusive model of partnership working is vital and this must include integration with all relevant departments, policies and initiatives	14 (23%)	4 (14%)	3 (19%)	0	2 (33%)	5 (71%)
5.4 The inclusion of lone parents as a new PSI group is welcomed, providing that there is evidence that the PSI model is effective	12 (20%)	8 (29%)	0	0	1 (17%)	3 (43%)
5.5 Clarification of the evaluation process is required and more robust data collection mechanisms will be needed	16 (27%)	6 (21%)	2 (13%)	0	3 (50%)	5 (71%)

## **Section 1: General comments on the development of an Anti-Poverty Strategy**

32 respondents comment on the development of an Anti-Poverty Strategy (APS), reflecting five main concerns:

- Support for the focus on outcomes rather than process
- Clarification is required regarding the role of the APS in relation to wider government policy
- The need for greater community involvement and ‘ownership’ of the strategy
- Widespread belief that the strategy should be subject to full Equality Impact Assessment

### *1.1 Support for the focus on outcomes rather than process*

Eight respondents support the strategies’ focus on outcomes rather than process and there some explicit support for the principle of targeting those in greatest social need (2 responses); although the latter comments need to be viewed in the context of widespread dissatisfaction with the analysis of poverty contained within the document (see section 3 below). No VCS responses were found in relation to this issue.

### *1.2 Clarification is required regarding the role of the APS in relation to wider government policy*

Thirteen respondents have commented on the relationship between the role of the APS and wider government policy. Seven of the thirteen responses are from within the VCS, with 4 multiple responses commenting on this issue.

Responses reflect a concern that the APS should operate at the heart of government, thereby requiring a commitment to ‘mainstreaming’ poverty issues throughout government departments. Furthermore it is argued that the APS should contain an analysis of government expenditure to balance this towards the poor (4 responses), and that the APS should be the key strategy that informs all others. This latter point is important in the context of the ‘links’ between the APS and other strategies. For example, some suggest that the APS does not appear to be in line with the National Action Plan (4 responses). It is also argued that the strategy needs to draw more on the experience of international, Irish and UK developments and it is felt that some mechanism for coordination with the Irish APS needs to be developed, especially in relation to border communities and those most affected by conflict (4 responses). There seems to be a degree of confusion over this suggesting that clarification of the role of the APS and its relationship with other policies/programmes is required in the final strategy.

### *1.3 The need for greater community involvement and ‘ownership’ of the strategy*

Five respondents call for greater community involvement and ownership of the strategy. It is argued that greater recognition of the role of the private, voluntary and community sectors in this debate is needed for the strategy to be successful. Specifically concern is expressed that a framework for community involvement needs to be developed, particularly for people experiencing poverty and young people (5 responses). Wider representation is also an issue raised in relation to the ministerial forum (see section 5.2).

The majority of concerns in this area are expressed by VCS respondents, 2 of which come from multiple responses.

### *1.4 Equality Impact Assessment*

Nineteen responses discuss the issue of EIA. Only one respondent accepts the claim that full EIA is not possible on high-level strategy. The remainder all deem the position outlined in the consultation document as **unacceptable** and possibly illegal. Ten of the responses come from within the VCS. None of the local authority responses included any comment on this issue.

The Children’s Law Centre sums up the views of all these respondents as follows:

*“We..believe that the equality statutory duty imposed on OFMDFM by section 75 of the Northern Ireland Act 1998 must underpin all levels of policy making to ensure that there is no adverse impact on any of the nine groups detailed in the legislation. We would submit that OFMDFM have misdirected themselves in their interpretation of Section 75. We believe that the letter and spirit of Section 75 intends for equality concerns to be central to the policy decision-making process... In order for an equality perspective to be central to policy making it needs to be incorporated in all policies at all levels and stages. This would unequivocally involved incorporation of the principles of equality of opportunity from the beginning of this process and throughout the development and implementation of the Strategy” (Children’s Law Centre)*

## Section 2: Strategic Aim of the APS

Twenty responses specifically address the 'strategic aim' of the APS. Only one welcomes the current version.

- The strategic aim should be the eradication of poverty and social exclusion
- The strategic aim should include specific issues

### *2.1 The strategic aim should be the eradication of poverty and social exclusion*

Twelve responses call for the aim to be the eradication of poverty; 9 of these want the aim to include the eradication of social exclusion; and 6 believe it should further seek to promote social inclusion. One highlights the importance of achieving this by a certain date.

Five of these responses are from VCS organisations, including 2 multiple responses. No local authority responses mention this issue.

### *2.2 The strategic aim should include specific issues*

Six responses focus on the inclusion of specific issues. For these respondents the strategic aim:

- should define poverty and seek to reduce it by a specific % within a defined timescale (2 responses)
- should include priority to tackle inequality and discrimination (1 response)
- should build on the all-Ireland dimension (1 response)
- should include health (*to improve income, health and living conditions...*) (1 response)
- should fit with the 4 common EU objectives (2 responses)

Four of these responses come from within the VCS. No local authority or partnership organisations mention specific issues in relation to the strategic aim.

## Section 3: Analysis and Definition of Poverty

Fifty respondents have commented on the analysis and definition of poverty used in the document. These can be summarised as follows:

- The strategy needs to be based on a wider analysis of the causes of poverty and social exclusion to develop a clear and agreed definition from which to operate.
- The strategy should focus on the needs of those who are full time carers and others who are unable to work
- The strategy needs a focus on the working poor and in work poverty
- The strategy needs a focus on the social aspects of poverty
- The strategy must include a reference to child poverty
- The strategy should include reference to the link between poverty and conflict
- The strategy should focus on rural poverty
- The strategy should include a focus on older people
- The strategy should have a greater focus on the needs of disabled people.

Generally speaking respondents are critical of the overall approach to poverty taken in the document and are concerned to see a wider, more social, approach being taken. This is not to say there is any widespread condemnation of the existing priorities, rather respondents want the strategy to be wider in its focus and to embrace specific social groups more fully than at present.

More positively, there is a degree of support expressed for the inclusion of 'capacity building' (7 responses) as a mechanism for developing participation in economic and social life. Four respondents feel this should include a focus on developing capacity within areas to reach and involve disadvantaged communities.

### *3.1 The strategy needs to be based on a wider analysis of the causes of poverty and social exclusion to develop a clear and agreed definition from which to operate.*

Thirty five responses include reference to the definition of poverty used in the strategy. 71 per cent of VCS responses comment on this issue, including all multiple responses; and half of the statutory responses include comment on the analysis and/or definition of poverty. Thus these responses come from all sectors, with the notable exception of local authority respondents (see Table 3).

There is a clear sense that the current analysis of poverty is insufficient to act as the basis for an APS. Specifically respondents are concerned that the strategy does not adequately address:

- The increasing gap between rich and poor (13 responses)
- The causes of poverty (17 responses)

Ten respondents call for a clear and agreed definition of poverty and social exclusion to form the basis of the strategy. In reaching such a definition, various alternative frameworks are suggested including: a rights based approach; an equality based approach; and a lifecycle approach.

11 respondents specifically argue that the emphasis on employment and employability is too narrow. This concern underpins a view that, in its current form, the strategy will impact most on working age unemployed adults thereby ignoring the needs of many other social groups (see sections below).

Related to concerns regarding the emphasis on employment and employability, 6 respondents were concerned that the link between poverty and inequality should be central to the strategy.

A further issue raised by 2 respondents is the importance of building in a preventative element to the strategy to ensure future generations do not fall into poverty.

### *3.2 The strategy should focus on the needs of those who are full time carers and others who are unable to work.*

25 responses allude to issues pertaining to the needs of carers and those unable to work, which it is felt the current strategy ignores. 15 of these are from VCS organisations, including 4 multiple responses; but none of the local authority responses comment on this issue (see Table 3).

One aspect of concern in relation to benefit levels is the higher cost of living in Northern Ireland which, respondents argue, needs to be considered in policy decisions. Consequently the strategy should:

- tackle the lack of affordable, accessible childcare (14 responses)
- ensure benefit levels are adequate and poverty proofed (10 responses)
- address the problems of benefit take up (2 responses)
- consider the impact of fuel costs (1 response)

### *3.3 The strategy needs a focus on the working poor and in work poverty*

25 responses include reference to issues relevant to the needs of the working poor and in work poverty, which they feel is missing from the current analysis. This issue is mentioned by a wide range of organisations across all sectors (see Table 3).

A number of policy issues that respondents feel the strategy should address are raised that reflect a concern for the working poor:

- low pay and minimum wage levels (16 responses)
- the lack of affordable, accessible childcare (14 responses)
- the impact of tax rates and the rebalancing of rates (6 responses)
- fuel costs (1 response)
- inflexible working environments for lone parents (1 response)
- lack of family friendly employment policies (1 response)

### *3.4 The strategy needs a focus on the social aspects of poverty*

26 respondents specifically discuss a range of social aspects of poverty and social exclusion that respondents feel are not covered adequately by the document. Again the responses come from the full range of sectoral types (see Table 3) and include 3 multiple respondents.

The view of many is expressed by CCMS as follows:

*“the social aspects of poverty must be included more fully to balance the focus on financial and labour market outcomes” (CCMS)*

Specifically, respondents call for greater emphasis on the links between poverty and:

- Health and mental health (20 responses)
- Education and skills enhancement (18 responses)
- Housing and the environment (7 responses)
- Transport (1 response)
- Crime (1 response)
- Discrimination (1 response)

### *3.5 The strategy must include reference to child poverty*

The specific exclusion of any focus on the issue of child poverty is opposed by 22 respondents. None of the local authority responses mention this issue, but otherwise there is cross-sectoral support for the inclusion of specific targets relating to child poverty. Three multiple responses support this issue.

Three respondents argue that the UK target to eradicate child poverty by 2020 would be an appropriate one for the strategy to adopt. Concern is also expressed regarding the lack of child poverty data used in the consultation document, despite the existence of relevant evidence (see response 46).

Respondents also express concern that the current document assumes that the Children and Young People’s Strategy (CYPS) will set targets regarding child poverty when existing understanding seems to be that this is not the case. Four responses argue it is inadequate to point to the CYPS strategy since, as Inner City Belfast Sure Start point out, “we are very aware the commitment to the elimination of child poverty is ambivalent within this strategy also” (25). Save the Children go further and suggest that the CYP Unit believe that the APS will cover child poverty targets. The confusion over this issue needs clarification.

The importance of one agency taking the lead on child poverty is reiterated by organisations, as summed up by ICBSS:

*“Child poverty is too prevalent and serious an issue in NI society for it to be passed form pillar to post” (ICBSS)*

It is generally felt that the CYPS and the APS should contain the same targets and these should be developed within the APS. Further, five respondents express the view that child's rights indicators need to be developed and that outcomes regarding children should be based on UNCRC.

In developing a child poverty strategy the following specific issues are raised:

- Benefits for 16-18 year olds
- Student debt
- Disabilities
- Youth service under-funding
- Specific indicators for young people

The issue of consultation with children and young people is also raised by many organisations. Those who expanded on this point are critical of attempts thus far to engage with young people and suggest a range of mechanisms through which 'meaningful' participation by young people can be achieved (see response 46 for details).

### *3.6 The strategy should include a reference to the link between poverty and conflict*

Seventeen respondents express disappointment that the report contains no analysis of the links between poverty and conflict. A range of organisations from across the different sectors mention this issue, including one multiple response (see Table 3).

Specifically, ADM/CPA argue that the APS should "explicitly recognise the relationship between poverty and conflict and [undertake] a specific analysis of how these relationships have been manifested in the NI context"; and the APS "should set out clear measures for addressing the poverty-linked impacts of the conflict".

### *3.7 The strategy should focus on rural poverty*

Seventeen respondents recognise the omission of any focus on rural poverty in the strategy. Again there is a spread of responses from different sectors regarding this issue, including 2 multiple responses.

Concern is expressed that:

- The definition of poverty does not show any understanding of rural issues
- There is no specific budget or programme for anti-poverty work in rural areas
- The document lacks any rural outputs or targets

Specifically it is argued that an APS should include a specific section on rural poverty and address the following issues:

- access to services
- housing
- isolation
- transport

### *3.8 The strategy should include a focus on older people*

Nine respondents highlight the lack of focus placed on the needs of older people for whom paid employment is not an option. Five of these are from the VCS, and no multiple responses mention this issue.

It is argued that the analysis of changing patterns of social need ignores the predicted increases in those of pensionable age and therefore the potential increases in pensioner poverty. Consequently it is argued that the strategy should address the adequacy of pensions and the wider issue of pensioner poverty.

### *3.9 The strategy should have a greater focus on the needs of disabled people.*

Six respondents highlight concern at the lack of focus on the needs of disabled people. Three of these are from the VCS and include none of the multiple responses.

Mencap express disappointment at the lack of available evidence regarding poverty/disability and argue for more research in this area, whilst Disability Action argue that “any APS must address the practical and attitudinal issues regarding people with disabilities” including the benefits trap, educational inequalities and high unemployment.

## Section 4: Targets, indicators and action plans

33 respondents commented on this issue, with the main comments summarised as follows:

- The strategy should specify measurable, time-based actions and targets
- Ministers should set targets, not departments
- The use of specific indicators is required
- There should be greater consultation over proposed targets

### *4.1 The strategy should specify measurable, time-based actions and targets*

27 respondents comment on this issue from across all sectors. All the local authority responses contained discussion of targets; along with 11 VCS responses (see Table 3).

Whilst 15 respondents express concern that the document fails to specify targets and actions, the principle of targeting is supported by 2 respondents and the use of targets and indicators is welcomed by a further 3. However it is widely agreed that these need to be specified, measurable and time based (16 respondents). Two respondents argue that targets should be outcome focussed.

### *4.2 Targets should be set by ministers, not departments*

Ten respondents discuss the plans for target setting. Six of these were VCS (1 multiple response); but no responses from local authority or statutory organisations refer to the issue.

Concern is expressed by 5 respondents that departments will be responsible for setting their own targets. A further 4 believe that targets should be set by ministers for departments who should then develop and implement these. Two respondents specifically refer to the need for clear 'smart' targets to be applied to all relevant departments so that they have a collective responsibility to deliver.

### *4.3 The use of specific indicators is required*

Six respondents (4 VCS, 2 statutory) call for more comprehensive indicators to match targets and a wider range of targets and indicators to reflect a more diverse approach to poverty, including those relating to:

- social exclusion
- education
- capacity building
- social capital
- people with disabilities
- poor health

#### *4.4 There should be more consultation over the setting of targets*

Four respondents (3 VCS including 2 multiple responses) specifically highlight the importance of further engagement over proposed targets. This is partly to ensure that groups with specific expertise, such as VCS groups, can contribute to their development; and it is argued that people experiencing poverty should be consulted over targets as well as children and young people.

## Section 5: Delivery, implementation and evaluation

For the purposes of the summary report a number of related items are dealt with in this section including funding, the proposed ministerial forum and the monitoring and evaluation of the strategy. The key recommendations are as follows:

- The APS should be funded via a dedicated budget. The skewing of resources is not supported.
- The development of a ministerial forum is welcomed, but clarity of function, responsibilities and powers is required along with wider representation.
- Ensuring the APS provides an inclusive model of partnership working is vital and this must include integration with all relevant departments, policies and initiatives.
- The inclusion of lone parents as a new PSI group is welcomed, providing that there is evidence that the PSI model is effective.
- Clarification of the evaluation process is required and more robust data collection mechanisms will be needed.

### *5.1 The APS should be funded via a dedicated budget. The skewing of resources is not supported.*

39 respondents comment on the funding of the strategy. This includes a significant proportion of respondents in all sectors: 65 per cent of VCS respondents (including 4 multiple responses); 75 per cent of statutory; all local authority responses; and 50 per cent of partnership organisations.

13 respondents express dissatisfaction that skewing of resources remains the favoured approach to funding. Ten respondents argue that more evidence regarding the effectiveness of skewing is required. A sense that skewing does not work underpins many of these criticisms, as does the view that the APS is too important not to have its own dedicated budget stream. Other arguments against skewing include the view that skewing encourages the 'silo' mentality that the strategy seems to be seeking to change; and that budgets are already constrained. Another respondent argues that skewing lacks transparency and is not applied systematically.

Five alternative funding mechanisms are supported to varying degrees:

- Dedicated budget / top-slicing (16 respondents; 4 multiple responses)
- Additional funds to be available alongside skewing (6 responses)
- Specific ring fenced funding (no skewing) (4 responses)
- Specific budget commitment should be made to deprived areas (3 responses)
- Dedicated budget as well as ring fenced monies for specific projects (2 responses)

### *5.2 The development of a ministerial forum is welcomed, but clarity of function, responsibilities and powers is required along with wider representation.*

36 respondents comment on the ministerial forum. These are drawn from across all sectors, most notably half of the statutory organisations comment on this and all the local authority responses. 16 VCS organisations discuss the forum, including 2 multiple responses.

The development of the forum is welcomed in principle by 23 of them. Three of these suggest that the forum should be established earlier than implementation stage to ensure full ownership and allow it to consider the consultation responses; and a further three suggest that its structures of management and accountability need to be developed. In addition, however, a further 7 respondents want greater clarification regarding the forum's authority and power.

19 respondents comment on the need for greater representation on the forum, particularly in relation to:

- People experiencing poverty (11 responses)
- Children and young people (6 responses)
- Voluntary and Community sector (2 responses)

### *5.3 Ensuring the APS provides an inclusive model of partnership working is vital and this must include integration with all relevant departments, policies and initiatives*

14 respondents comment on 'partnership working' and links with other strategies more specifically. These are drawn from all sectors with the exception of local authority respondents, none of whom comment on the issue (see table 3).

The idea of partnership working that underpins the strategy is specifically welcomed by two respondents, but there is also a strong sense that 'partnerships' should include a wide range of stakeholders including the VCS and those experiencing poverty. This view is reiterated by the NIAPN workshops that stress the importance of a meaningful 'joined-up' approach to the strategy.

Eight respondents feel that clearer mechanisms and clarity for integration with other initiatives and policies is required and that accountability and co-ordination across strategies should be developed further. Specifically it is argued that all government policies should be 'poverty proofed' to avoid contradictions in policies (5 responses). In addition, respondents identify a wide range of other strategies relevant to the APS, and many organisations were keen to see the final strategy include named strategies such as:

- Investing for health (4 responses)
- Neighbourhood renewal strategy (6 responses)
- Ageing in an Inclusive Society (1 response)

*5.4 The inclusion of lone parents as a new PSI group is welcomed, providing that there is evidence that the PSI model is effective.*

12 respondents comment on the use of the PSI model within the strategy. Eight of these are from within the VCS. None of the statutory or local authority respondents comment on this issue (see table 3).

The inclusion of lone parents as a new PSI group is welcomed by 7 respondents; but 8 responses express concern about the PSI model more generally. Three respondents argue that no new PSIs should be established until the evaluation of existing ones is complete.

*5.5 Clarification of the evaluation process is required and more robust data collection mechanisms will be needed*

16 respondents are concerned with the monitoring and evaluation of the strategy. With the exception of local authorities, all other sectors are represented here although none in significant numbers (see table 3).

In principle the development of indicators to monitor progress is supported, although 8 respondents argue that more information is required on how the APS will be evaluated and how departments will be held accountable. Further, one respondent suggests that monitoring should be integrated within existing performance monitoring arrangements and should not impose additional reporting processes.

It is widely accepted that an effective monitoring/evaluation process will rely upon robust and effective data collection systems and research, which 3 respondents felt needed to be improved. Three respondents argue that these systems need to be capable of capturing: the full range of section 75 categories; the local dimensions of poverty and disadvantage; and the qualitative impact of actions on the ground. One respondent suggests the creation of an all-Ireland Anti-Poverty research group as a means to fill gaps in data on poverty.

## **Concluding comments**

A number of respondents commented on the presentation of the current document with 4 stating that it is complicated and/or poorly structured in its present form. Disability Action also request that alternative formats for the report are indicated earlier and include a textphone for deaf people.

It is hoped this summary of responses to the Phase 2 consultation are useful in amending the current strategy.

## Appendix A: List of respondents

Number	Name of respondent	Type
1	ADM/CPA	Statutory
2	Age Concern Northern Ireland	VCS
3	Antrim Borough Council	Local authority
4	Armagh and Dungannon HAZ	Partnership
5	Armagh Senior Citizens Forum	VCS
6	Belfast City Council	Local Authority
7	Healthy Cities Belfast	Statutory
8	Caroline Murphy	Individual
9	Causeway Health and Social Services Trust	Statutory
10	Council for Catholic Maintained Schools	NDPB
11	Children and Young people in Derry	VCS
12	Children in Northern Ireland	VCS/Umbrella
13	Children's Law Centre	VCS
14	Citizens Advice	VCS
15	Communities in Transition Programme	VCS
16	Craigavon Borough Council	Local Authority
17	Derry Children's Commission	Partnership
18	Disability Action	VCS
19	Callie Persic	Individual
20	EGSA	VCS
21	Equality Commission	VCS
22	General Teaching Council for NI	VCS
23	Gingerbread	VCS
24	Help the Aged	VCS
25	Inner City Belfast Sure Start	Partnership
26	Institute of Public Health in Ireland	Statutory
27	Job Assist Centre, Belfast	Statutory
28	Lenadoon community Forum	VCS/Umbrella
29	Martin Flynn	Individual
30	Mencap	VCS
31	NCH Northern Ireland	VCS
32	National Energy Action – Northern Ireland	VCS
33	Northern Ireland Anti-Poverty Network	VCS/Umbrella
34	NI Human Rights Commission	Statutory
35	NI Legal Services Commission	NDPB
36	NIACRO	VCS
37	NIAPN – Belfast Workshop	Workshop
38	NIAPN – Londonderry workshop	Workshop
39	NIAPN – Omagh workshop	Workshop
40	NICVA	VCS/Umbrella
41	North and West Belfast HAZ	Partnership
42	Northern Health and Social Services Board	Statutory
43	NI Commissioner for Children and Young People	Statutory
44	Ordnance Survey NI	Statutory
45	Rural Community Network	VCS/Umbrella
46	Save the Children	VCS

47	Sinn Fein	Political Party
48	S&E Belfast Health and Social Services Trust	Statutory
49	South Antrim Rural Network	VCS
50	Southern Health and Social Services Board	Statutory
51	Southern Investing for Health Partnership	Partnership
52	Sperrin Lakeland Health and Social Care Trust	Statutory
53	British Psychological Society	Professional Body
54	The Labour Party	Political Party
55	The Royal Hospitals	Statutory
56	Translink	Private
57	West Belfast Economic Forum	VCS
58	West Belfast Partnership Board	Partnership
59	Western Health and Social Services Board	Statutory
60	YouthNet	VCS/Umbrella