

Children in Northern Ireland (CiNI)

Response to

**NEW TSN – THE WAY FORWARD
TOWARDS AN ANTI POVERTY
STRATEGY**

PHASE 2 CONSULTATION

ANTI-POVERTY

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Introduction

Children in Northern Ireland is the regional umbrella body for the voluntary child care sector in Northern Ireland.

CiNI represents the interests of its 90 member organisations, providing policy, information, training and support services to members in their work with children and young people. CiNI has a diverse membership with member organisations working with and for children from their early years to young adolescence and with children and young people experiencing the multiple impact of living in poverty in Northern Ireland.

In making a response to this consultation CiNI is seeking a robust and effective anti-poverty strategy for Northern Ireland that recognises the extent and depth of child poverty in Northern Ireland and puts in place a strategy and action plan that can end child poverty.

We do not believe that the proposals outlined in the Phase II document New TSN – The Way Forward: Toward an Anti-Poverty Strategy can deliver an effective, comprehensive assault on poverty and social exclusion in Northern Ireland.

At the outset CiNI would like to highlight its endorsement of NICVA's open letter to Minister of State Lord Jeff Rooker. We believe that the focus on inequality as the root cause of poverty and social exclusion and the recommendations for an alternative focus sign post the way forward to an anti-poverty framework which could be developed, in consultation with all key stakeholders, particularly those adults and children and young people who have direct experience of living in poverty, to deliver a robust and effective anti-poverty strategy.

CiNI is particularly concerned to ensure that the way forward toward an anti-poverty strategy should include a specific focus on child poverty, that is alarmingly absent within the current proposals. In developing its response CiNI has been greatly informed and directed by Save the Children's analysis derived from their experience in both documenting the extent of child poverty and lobbying for an end to child poverty in Northern Ireland.

Focus on Child Poverty

CiNI is deeply concerned at the consultation documents failure to highlight and appropriately draw on the research that is now available in relation to the causes and effects of child poverty in Northern Ireland. CiNI also notes the consultation documents failure to give due cognizance to child poverty measures, which include a mixed measure of deprivation and low income, that have been endorsed by both the EU and UK Governments. We believe these child poverty measures should provide a sound baseline analysis of the extent and depth of child poverty which should inform the development an effective strategy to address child poverty.

The Labour Government's commitments to eradicating child poverty with its targets to halve child poverty across the UK by 2010 and eradicate child poverty by 2020 should

be explicitly applied in Northern Ireland. CiNI recommends that there is a clear lead focus on child poverty in the Anti-Poverty Strategy, and that the focus is replicated in the Children and Young People's Strategy. In other words, while the anti-poverty strategy should assume lead responsibility, both strategies should include a common chapter on child poverty, and both should report back on progress towards targets associated with child poverty.

CiNI believes that Northern Ireland's Minister for Children can demonstrate the Government's commitment to eradicating child poverty by making it a priority on his agenda for children and through his Ministerial Sub-Committee on Children and Young People promote and ensure co-ordinated, joined-up implementation of the child poverty element of the strategy across Government. Furthermore, in his outreach to children and young people the Minister must put in place mechanisms to actively involve children and young people who have experience of poverty.

Strategic Approach to an Anti-Poverty Strategy

CiNI also has fundamental concerns regarding the strategic framework proposed in the consultation document. It falls far short of a robust, coherent strategic framework that can deliver an effective anti-poverty strategy, which can inspire the confidence of those who live in poverty that the Government is serious about ending poverty. From a Ministerial vision that sets out what government wants to achieve must flow a proper strategy with high level outcomes that translate into objectives that in turn are embodied in concrete targets and actions with indicators developed to measure impact.

Ministerial Vision

CiNI notes that in response to the previous consultation a vision for the anti-poverty strategy is put forward in the Phase II document. The vision is of:

'the development of a society which aims to enable its citizens to be fully participative, to realise their full potential and live free from poverty and social exclusion' (p. 90).

However, the vision is hidden within Annex 1. We believe that it should be the overarching headline statement that captures a shared vision of a society free from poverty from which all other elements of the strategic framework flow and against which the success of the strategy can ultimately be measured. CiNI would recommend that this vision is re-written so that it is real and tangible and based on a clear vision of a society, not the development of a society aiming towards an ideal.

'The anti-poverty strategy's vision is of a society which enables its citizens to be fully participative, to realise their full potential and live free from poverty and social exclusion'.

Outcome Focus

CiNI believes that the Anti-Poverty Strategy should have a clearer outcome focus. Outcomes are referred to in relation to target setting; however, they are given no specific detailed consideration.

An outcome focus would ensure consistency with the Children and Young People's Strategy. In terms of child poverty we believe that an outcome approach, underpinned by

the rights of the child as enshrined in the UN Convention on the Rights of the Child, would support the eradication of child poverty.

We believe that a strategic outcome in relation to child poverty should address what the eradication of child poverty would look like in real terms for children living in poverty, that is, the positive difference it would make to their lives.

All outcome statements must be informed by an analysis of the causes of poverty and serve to address both the causes and impact of poverty. We believe that an outcome focus would promote a partnership approach to working together to eradicate poverty and promote the inclusion of all key stakeholders. It would also ensure that the Anti-Poverty Strategy is more meaningful for those living in poverty and would encourage their engagement in the development, implementation, monitoring and review of the strategy.

CiNI believes that an outcome focus could link to and compliment a life cycle approach to tackling poverty as adopted by the DWP anti-poverty strategy Opportunities for All. It has identified the periods in a person's life where they are most likely to be living in poverty, analysed the root causes of vulnerability, and developed a range of programmes to tackle poverty at each stage. It has resulted in a major focus on children and a range of programmes to address each stage of childhood. We believe that this approach linked to positive outcomes for each stage of childhood would help ensure a systematic and comprehensive approach to the anti-poverty strategy that promotes joined up and collaborative development and implementation of the anti-poverty strategy.

Strategic Aim/Objectives

We note the proposed strategic aim and objective areas/policy priorities and believe that these have a narrow focus on employment and employability and are not broad enough to tackle the wide spectrum of poverty and deprivation. We would recommend that the anti-poverty strategy adopt over-arching aims that are more fully reflective of the common EU objectives for combating poverty and social exclusion and that these are reflected in strategic outcome statements.

This would enable the anti-poverty strategy to contribute more directly to the UK National Action Plan on Social Exclusion. We would recommend that these over-arching aims could be supported by policy priorities focused on specific groups such as children and young people, similar to the approach taken in the UK action plan Opportunities for All.

Targets

Of all the proposed elements of the strategic framework in the consultation document there is a focus on the development of targets, with reference to strategic targets; supporting targets; and targets for nine objective areas. We feel that the different levels of target setting can only serve to distort the overall focus of the strategy, in fact, in reality it adds little to what the strategy will look like as the document states:

'It is not possible at this stage to be explicit about the targets to be set for each of the nine objectives. This will only be possible when the framework for developing the

strategy has been agreed and the quantum of Departmental actions and activities in support is clarified.'

At this point our main concern relates to how these targets will be set as the document states that:

'Departments and their agencies will be asked to identify targets for both the nine objectives areas and for their supportive actions underpinning these objectives.'

Departments will 'guide' Ministers in their final agreement of targets. We believe this is not proper process in terms of strategic planning. Ambitious targets must be set by Ministers, based on the strategic outcomes, aims and objectives of the strategy. Departments must then develop and implement appropriate actions that will deliver on the targets.

Indicators

To measure progress toward the achievement of targets specific matching indicators also need to be developed. We believe that the 'children' indicators must be based on the United Nations Convention on the Right of the Child and data compared for poor and non-poor children.

OFMDFM's Children and Young People's Unit should develop a list of child rights indicators to monitor the impact of the Children and Young People's Strategy. Given that we support the need for a shared common focus on child poverty in both the Children and Young People's Strategy and the Anti-Poverty Strategy these indicators may also be adopted for the Anti-Poverty Strategy. While the Children and Young People's Strategy would report on the overall data for each indicator, the Anti-Poverty Strategy would disaggregate these statistics for poor and non-poor children and compare the two.

Regional Action Plan

The actions that will be taken to deliver on the key elements of the strategy as discussed above are a fundamental element of the strategy, and perhaps the element which is of most direct concern to those experiencing poverty and, therefore, requiring full public consultation and equality impact assessment.

The Ministerial Foreword sets out the thinking on actions to deliver the strategy:

'We therefore want to ... refine and develop our ideas into a full Strategy and Action Plan. This will not create an entirely new set of actions and initiatives. Many actions which are currently in place are important and should continue. Instead, the strategy sets the context and framework for the continuation of existing measures which are effective and developing and resourcing of future measures to fight poverty and social exclusion.'

We believe that the strategy must look far beyond simply the continuation of existing initiatives. For example, while the Sure Start initiative holds much potential as has been shown by the experience in England, its impact in Northern Ireland has been constrained by a lack of proportionate investment by the UK Government to enable the development of the Sure Start initiative to meet the needs of children and families in Northern Ireland.

Furthermore, we are deeply concerned that there are examples of initiatives that are effective in fighting poverty and social exclusion, supported by the Children's Fund and Peace II monies, that will no longer be funded beyond their current funding cycle and are being brought to an end.

We believe that the anti-poverty strategy must look to sustain these initiatives which were developed in the first instance to fight poverty and have been shown to deliver positive outcomes for children and their families. The irony is that should these initiatives be discontinued they will simply produce a gap in service provision, that may result in an increase in the extent and depth of child poverty here, and an effective anti-poverty strategy will have to put effort and resources into developing new initiatives to meet similar aims and objectives that the Children's Fund and Peace II projects were designed to meet.

We believe that such projects and programmes should be mainstreamed within a ring-fenced centralised children's budget and such a budget should provide a comprehensive range of initiatives to address deprivation at all stages of childhood.

Resourcing the Strategy

Resourcing of the anti-poverty strategy has attracted considerable discussion as a result of the high levels of dissatisfaction with the New TSN skewing policy. Despite its effectiveness having been questioned and alternatives including the 'top-slicing of budgets' put forward in both formal evaluations of New TSN and responses to previous consultations the current consultation document states the government's view that skewing is 'the most effective way of ensuring that measures to combat poverty and social exclusion continue to be mainstreamed within public expenditure, planning and resource allocation' (p. 90). Yet earlier in the document there is an open acknowledgement that 'key departments' have 'limited potential' to skew resources and rather have focused on 'skewing of efforts' (p. 33). This does not inspire confidence that skewing is the most effective way of ensuring that measures to combat poverty and social exclusion continue to be mainstreamed within public expenditure, planning and resource allocation.

CiNI believes that the Anti-Poverty Strategy must have a dedicated budget and is in favour of top-slicing departmental budgets to provide ring-fenced funds to target poverty. We also believe that systems must be put in place to test the effectiveness of spending on anti-poverty measures and these must be reported on regularly at the Ministerial Forum.

In addition CiNI continues to advocate strongly that the new Minister for Children should have a ring-fenced children's budget. The UN Committee on the Rights of the Child in delivering its Concluding Observations in 2002 recommended that:

'The State Party ensure transparent analysis of sectoral and total budgets across the State Party and in the devolved administration to show the proportion spent on children, to identify priorities and to allocate resources to the "maximum extent of all available resources" (para 11).

Child poverty must be one of the key priorities areas for expenditure on children and in line with the recommendation of the UN Committee on the Rights of the Child the Government should:

'undertake all necessary measures to the "maximum extent of available resources "to accelerate the elimination of child poverty' (para 44).

The Ministerial Forum

The proposal for a Ministerial Forum is positive, however to be truly effective in overseeing the implementation of the strategy, Departments and agencies must be fully accountable to the Ministerial Forum.

In relation to the Ministerial Forum's proposed terms of reference one of the points provides specifically that the Forum will:

'Provide a focus for consultation on the Northern Ireland Regional Action plan to tackle Poverty and Social Exclusion' (p. 99).

CiNI believes that any such action plan should be the subject of full public consultation and subject to equality impact assessment. In relation to the Northern Ireland Regional Action Plan we believe the Ministerial Forum's role should be to monitor and review the implementation of the action plan by Departments and agencies and hold them to account on their delivery of the action plan.

CiNI notes that the Ministerial Forum intends to facilitate a participative approach to tackling poverty and social exclusion and we would urge that mechanisms are developed to ensure that people experiencing poverty, including children and young people, are able to participate in the Ministerial Forum. A sub-group should be set up to address child poverty.

PSI Group on Lone Parents

CiNI notes the documents proposal to establish a PSI Group on Lone Parents. We believe that no new PSI groups should be initiated until there has been an evaluation of the impact of previous groups. There are widespread concerns that the PSI Group on Travellers delivered very little positive change for Travellers in Northern Ireland.

In addition the PSI approach appears to be extremely patchy. While children have been identified as one of the groups most likely to be living in poverty, they are not listed as a potential PSI group. Any approach that can exclude such a significant, particularly given the UK government's focus is clearly flawed. CiNI believes that a lifecycle approach similar to that in Opportunities for All would be more comprehensive and coherent. Sub-groups of the Ministerial Forum could be set up to match the Strategy's target groups. However, these must be given the remit to enable them to be more effective than the PSI groups. This would mean that they would have powers to ensure that their recommendations would be acted on and that they would monitor and evaluate impact on their target group.

Equality Issues

CiNI notes that there are no plans to equality impact assess the proposals in this document as high level strategies cannot be equality impact assessed. However, we believe that a failure to equality impact assess the proposals in this document is a breach of Section 75 of the Northern Ireland Act 1998 and the Equality Commission NI's Guidance on Implementing Section 75 of the Northern Ireland Act which states at Para. 1.7:

'The statutory duties in Northern Ireland underpin and influence policy-making in all spheres and at *all* levels of Government activity and public policy decision making' [own emphasis added].

While we realise that this may be challenging for government, nonetheless, we would point to Priorities and Budget 2006-08, where Government is working with the Equality Commission NI to subject the process to equality impact assessment. This process should be replicated for all high level strategy development.

Furthermore, we note that a representative from the Equality Commission who attended the first workshop run by NIAPN on 11 August 2005 confirmed that it was possible to conduct equality impact assessments on high level strategies and that OFMDFMs Anti-Poverty Unit should conduct an equality impact assessment on its proposals.

CiNI believes that an equality impact assessment must be conducted in the proposals in this document. Failure to do so has resulted in child poverty largely been ignored in the current proposals. In addition, the 'age' category (which includes young as well as older people) needs to be subdivided into each of the Section 75 categories to reflect the diversity of child and young people, for example children living with a disability, children from BME communities and young people with dependents (i.e. young parents or carers).

Consultation with Children and Young People

CiNI is aware that the Anti-Poverty Unit met with young people in Derry to discuss the consultation proposals on the invitation of the Derry Children's Commission; and late into the consultation period produced a young person's version of the consultation document in response to requests from the children's voluntary sector.

CiNI would highlight that this is a wholly inadequate response by OFMDFM to their statutory responsibility to pro-actively consult with children and young people and contravenes both Section 75 of the Northern Ireland Act 1998 and Article 12 of the United Nations Convention on the Rights of the Child.

Children and young people across the spectrum of Section 75 categories should be actively involved in further discussion on the development of the anti-poverty strategy and meaningfully consulted on the draft strategy. Particular attention should be given to ensuring that children and young people who are living in poverty are consulted.

Conclusion

We trust that given the fundamental concerns expressed collectively and individually by the children's voluntary sector and the wider community and voluntary sector that, in compliance with the principles, values and commitments of the 'Compact Between

Government and the Voluntary and Community Sector in Northern Ireland', there can now be a focused period of discussion to develop a holistic approach to our common vision of securing a society free from poverty and social exclusion. The Compact recognises that building real partnerships between government and the community and voluntary sector can bring added value to efforts to improve the quality of life in Northern Ireland. We believe that at this point discussion on the way forward is key to building the type of real partnership that can deliver a strategy that can bring an end to poverty in Northern Ireland.

We believe that this discussion can be informed by an analysis of submissions, both to this current consultation and also the previous consultation which ended in September 2004, and appropriate weighting should be given to submissions from government's partners in the community and voluntary sector recognising the particular knowledge and expertise the sector has developed in their role as a central advocate for those who are experiencing poverty and social exclusion. Following on from this analysis of submissions and subsequent discussion a full strategy and action plan should be drafted, subjected to full equality impact assessment and issued for the required twelve week consultation period.

CiNI remains committed to promoting the right of children to live free from poverty and social exclusion as this crucial process moves forward.