

ANTI-POVERTY

17 AUG 2005

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1010 New TSN - the way forward

DISABILITY ACTION'S RESPONSE AUGUST 2005

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INTRODUCTION

- 1 Disability Action is a pioneering Northern Ireland charity, working with and for people with disabilities. We work with our members to provide information, training, transport, awareness programmes and representation for people regardless of their disability; whether that is a physical, mental, sensory, hidden or learning disability.
- 2 More than one in five (300,000) people in Northern Ireland has a disability and the incidence is higher here than in the rest of the United Kingdom. Over one quarter of all families here are affected.
- 3 As a campaigning body, we work to bring about positive change to the social, economic and cultural life of people with disabilities and consequently our entire community.
- 4 Our range of services is provided from our Headquarters in Belfast and 3 local offices based in Carrickfergus, Dungannon and Londonderry with 85 staff and a number of volunteers.
- 5 Disability Action welcomes the opportunity to respond to this draft and to aid our response has put the relevant page/paragraph of the draft in brackets at the end of our comments.

GENERAL COMMENTARY

- 6 Disability Action is concerned that the reference to alternative formats is not made until page 83 (section 10.4) of the document. Additionally best practice in the inclusion of deaf people would suggest that everywhere a contact phone number is given, it should be accompanied by a textphone number. This omission discriminates against deaf people and we are disappointed that OFM/DFM has not accepted this obvious need, in spite of repeated requests from Disability Action.

SPECIFIC COMMENTARY

- 7 Disability Action agrees with the findings of the recent evaluation of New TSN (Executive Summary paragraph 12).

- 8 However the argument in this section that New TSN should be the basis of a wider anti poverty strategy is not in Disability Action's view either proven or valid unless resources are allocated to drive and deliver the policy (Executive Summary paragraph 13).
- 9 Disability Action would seek clarification on the term "objective" need (Page 2 paragraph 1.4).
- 10 In relation to the debate on measures of poverty and deprivation, Disability Action would advise that some consideration of the choices people on low income must make should be included. Disabled people for example, 70% of whom are believed to live in poverty, are often forced to choose between such essentials as food and clothing. Such information, even if qualitative rather than quantitative merits work across Departments (Pages 6 - 9 paragraphs 2.1 - 2.11).
- 11 Regarding people of working age and poverty exit strategies, the statistics relating to disabled people are stark.
- Disabled people are twice as likely to have no qualifications as non disabled people.
 - Disabled people can be up to four times as likely to be unemployed as non disabled people.
- 12 Too often as a result of this position disabled people are caught in a benefits trap with the offer of insecure, low paid employment not being enough to encourage the disabled person to leave the relative safety of a limited benefits package.
- 13 Additionally a culture of dependency, within which disabled people are regarded as passive and non contributing leads disabled people to accept this assessment and to lack the confidence to try work. Any strategy must recognize both the practical and attitudinal issues referred to above (Pages 22 - 24 paragraphs 2.35 - 2.49).
- 14 Disability Action would advise that the term " **those suffering problems of mental health**" is not appropriate and should be replaced by "**those with mental ill health**". Similarly "**minority ethnic communities**" should be "**black and minority ethnic communities**" (Page 27 paragraph 2.49).

- 15 Disability Action agrees that there should be a strong focus on financial hardship and on capacity building. Both are of particular importance to the community of interest Disability Action seeks to serve. In relation to the latter every Department should develop relevant policies, which should be applicable to both individuals and groups.
- 16 Additionally, Disability Action believes that parts (a) and (b) of the building capacity high level priority are not mutually exclusive and that when disabled people are encouraged to participate in and complete part (b) support should be made available to assist them to move on to part (a).
- 17 Disability Action welcomes the creation of a PSI Group on Lone Parents but would make the point that there is an urgent need to ensure that key strategic issues which cross PSI Groups, are identified and processed. Additionally, the issues of multiple identity viz women with learning disability, children who are carers etc must be targeted.
- 18 We therefore advise the establishment of structures to deal with these issues within the PSI initiative (Page 54 paragraph 6.3).
- 19 Disability Action fundamentally disagrees with the proposal to continue to skew resources rather than ring fence them. Most stakeholders that Disability Action has spoken to believe that using identified, allocated resources is in fact the most effective way to combat poverty and social exclusion. We would ask who considers skewing to be most effective (Page 55, paragraph 63, bullet point 2).
- 20 Disability Action is disappointed that disability issues are not specifically identified in the diagram at paragraph 6.6 as disabled people are identified as significantly vulnerable in the assessment of poverty (Page 59, paragraph 6.6 diagram).
- 21 The diagram at figure 4 is unclear. It only references a small number of departmental policies and does not appear to reflect the work of all departments (Page 61 figure 4).
- 22 Whilst understanding UK financial controls Disability Action would ask how much of the £48 million the Department of Education

would have spent whether New TSN was in place or not. We would similarly question the £214 million example of the DHSS & PS (Page 64 paragraphs 7.7 & 7.8).

- 23 Disability Action believes that 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 (Page 64 paragraph 7.9 first paragraph).
- 24 With reference to paragraph 7.11 - 7.13 please see our comments at 19 above.
- 25 Disability Action agrees with the establishment of an Anti Poverty Forum (Page 71 paragraph 8.2).
- 26 Disability Action is disappointed and concerned that the supporting targets underpinning the strategic targets contain no reference to people with disabilities.
Note: The target on health does not in our view relate to disability issues (Pages 78 & 79 paragraphs 9.9 - 9.17).
- 27 Regardless of the obvious benefit of the New TSN programme and if only as an example of best practice, this policy should be fully equality impact assessed (Page 87, paragraph 11.5).
- 28 Disability Action is concerned that no reference is made in the equality assessment to the needs of people with multiple identity and how the impact of this policy on them will be proofed (Page 88 paragraph 11.6).

CONCLUSION

- 29 Disability Action has welcomes the opportunity to contribute to this important debate.