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RECEIVED 30 AUG 2005

26th August 2005

**RE: New TSN—the way forward
A consultation document phase 2**

General

The strategic aim of the policy, "To improve the income and living conditions of the most disadvantaged" is weak, inadequate and does not imply a high level of commitment from government necessary to tackle poverty and social exclusion.

I propose a more robust strategic aim "***To eliminate poverty and social exclusion and actively promote social inclusion***"

Delivery

There is a lack of substantial content and clear direction in the plan. There does not seem to be a strategy, but rather collection of uninspired suggestions, which will vaguely be addressed, in the long, medium and short term.

I reject this strategy as a superficial attempt to address a growing and serious concern. The lack of clearly defined timetables, action points, targets and roles and responsibilities of government departments is further evidence of the lack of significance that has been devoted to this version of TSN. I would like to see all the departments demonstrate a shared agenda so that the strategy is mainstreamed effectively across all departments. In order to impact on the quality of life of those who are most vulnerable in our society the strategy must lay out demanding targets that will underline the importance of outputs and outcomes.

I am apprehensive over the delivery structure of nTSN since it appears that government departments are left to establish their own internal arrangements. We would like to see a vigorous monitoring system in place to ensure that the strategy remains on track. I propose that sanctions be applied to government departments that do not meet agreed targets.

National Action Plan

The National Action Plan (NAP) 2003-2005 states that by 2010 the UK will half child poverty and eradicate it by 2020. I am not convinced that the targets for the current NAP have been achieved. The Northern Ireland anti-poverty strategy does not appear to be in line with even the last NAP, nor is it as ambitious in its mission and targets.

I am concerned that the real strategy will be laid out in the Regional Action Plan (RAP), however there is no detail regarding the RAP including a timetable, budget and a clearly defined accountability structure. There are additional concerns regarding the impact of the NI Regional Action Plan in relation to the UK NAP and feel that the specific concerns raised in relation to Northern Ireland will be lost in an overall UK document. I also question if there are there EU standards and indicators that should be built into both the NAPs and RAPs.

Government commitment

I welcome the emphasis on lone parents in the fight against poverty. However, in relation to the Promoting Social Inclusion (PSI) initiative, we are unconvinced it will make a difference. There has been little success of PSI in the past and disillusionment at a community level about the outcomes of the current PSI. My concern is that the Lone Parents PSI will become another talk shop that will deplete resources, time and divert from the issues at hand.

In order to be successful, the strategy and important elements such as the lone parents PSI must be driven by political will and support across the departments. I have some concern regarding the Ministerial group—will it have powers? Will it have 'teeth'? I suggest that the Ministerial group should have a wider membership, not just civil servants. I would also like to see the sharing of ideas and good practice on an all-Ireland as well as European wide basis.

Skew/Resources

I am extremely apprehensive that we being asked to endorse a policy that has not been proven to be effective on the ground and has not made an impact on poverty in the past. In my experience, the New TSN has not impacted in areas of deprivation and to continue forward without learning from past mistakes is ill advised. There is an imperative at this point to reevaluate previous approaches instead of persisting with the same formula that has not been proven effective. A significant shift in policy, resource allocation, political commitment, coupled with a refreshed approach to addressing poverty could help impact at the deepest level and improve the quality of life for those who are most vulnerable, excluded and disadvantaged in our communities. I feel the opportunity to reassess the nTSN is an opportunity that must not be lost, and it is essential that we act now to readdress previous shortcomings.

Past experience has demonstrated that skewing resources has not worked across all departments, nor impacted sufficiently on the lives of those living in poverty. I would also like to express our dissatisfaction with the previous 'skewing efforts', which are not enough, especially from key departments such as the DSD. In order to meet the potential of the APS there must be effective and targeted resources.

I feel that there is a lack of evidence of the positive impact of skewing resources and contend that there must be a separate budget to support the anti-poverty strategy (APS).

I do not accept that this strategy is too high level to have a full Equality Impact Assessment. This is a breach of statutory duty under Section 75 of the Northern Ireland Act, 1998. This position is unacceptable and I understand this as an attempt to evade legislative responsibilities.

Existing strategies

I would like clarification as to how the APS links into and complements other existing policies?

I feel that there should be demonstrable links with the DSD's policy on Neighbourhood Renewal. Neighbourhood Renewal focuses on areas that fall into the worst 10% in terms of multiple deprivation. It aims to regenerate communities are largely based on 'bend the spend' or skewing public services and resources to areas of greatest need. However, this policy has been rife with difficulties and not all government departments have demonstrated their commitment to Neighbourhood Renewal. How will NR and the APS strategies complement each other? I feel that it would be useful if there are shared and agreed floor targets and deprivation related targets in order to measure the performance of public services and government departments to ensure that all departments are working towards same agenda, targets and baseline information.

How does the APS sit with rates increases and water charges?

I want to highlight that Surestart is not resourced and supported to the same degree in NI as it is in England and thus is a flawed example of joined up work.

Poverty

One of the weakest aspects of this strategy is that there is no analysis of the causes of poverty. We need an APS that tackles low pay; childcare provision; educational achievement and the massive health inequalities suffered by the deprived and marginalised communities.

I am concerned that child poverty has become lost in the strategy. There are high levels of child poverty in Northern Ireland and indicators that reflect child and adult poverty should be built into the strategy. This includes an examination of children's needs and the impact of inter-generational poverty and cycle of deprivation. I would like to see measurable targets such as reduction of children in low-level income homes and raise outcomes for children at risk of exclusion built into the APS.

This document does not recognise that the gap between the rich and poor is getting larger. I question whether we are in the process of developing an underclass that will face additional social exclusion and will become harder to reach in the future.

Surprisingly, there is no recognition of the impact and legacy of the troubles on poverty and the causes and types of poverty people living in Northern Ireland face. I believe that the APS must also consider the impact of the conflict and the continuing existence and impact of interfaces on the lives of disadvantaged communities in Northern Ireland. People living in interface communities suffer from poor physical environment, lack of access to facilities, unemployment, poor health and housing as well as the chronic fear of violence and intimidation. Interface communities in west Belfast, indeed, throughout Northern Ireland are consistently among the most deprived communities.

There is no reference to difference between rural and urban poverty and the way the APS will address these needs.

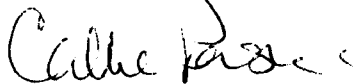
I propose that there is a need to promote social responsibility and the active engagement of all citizens. Poverty and social exclusion should be the concern of all citizens. I would like to see active citizenship and a poverty awareness campaign built in to education to promote awareness of deprivation in society generally.

Conclusion

In conclusion, I reject the New TSN document as it currently exists. The vision needs to be placed up front and must state not only a commitment to improve conditions but to eradicate poverty. There is no evidence of commitment from Government to tackle the causes and consequences of poverty, particularly in Northern Ireland. The strategy is uninspired with no clear objectives, its needs to be backed by all government departments and by political will. The "skewing" of resources is a major concern – new TSN needs to have its own clearly defined budget. An EQIA is essential for such a high level strategy and it must consider the impact on section 75 groups.

To be successful I recommend that OFMDFM bring forward proposals for a strategy to combat social need that focuses on the real issues of poverty and disadvantage. I would welcome being part of the independent monitoring of this strategy to ensure it is meeting its targets.

Yours Sincerely,



Callie Persic