

## **Response to the New TSN – the Way Forward Towards an Anti-Poverty Strategy (June 2005)**

### **Introduction**

1. The Equality Commission for Northern Ireland (“the Commission”) is an independent public body established under the Northern Ireland Act 1998. The Commission is responsible for implementing the legislation on fair employment, sex discrimination and equal pay, race relations, sexual orientation and disability. The Commission’s remit also includes overseeing the statutory duties on public authorities to promote equality of opportunity and good relations under Section 75 of the Northern Ireland Act 1998.
2. The Commission’s general duties include:
  - working towards the elimination of discrimination
  - promoting equality of opportunity and encouraging good practice
  - promoting positive / affirmative action
  - promoting good relations between people of different racial groups
  - overseeing the implementation and effectiveness of the statutory duty on relevant public authorities and
  - keeping the legislation under review.
3. The Equality Commission has made a substantive response to the initial consultation on this issue (attached for convenience) and will therefore use this phase two consultation exercise to augment our substantive response as necessary.

## General Observations

4. The Commission has consistently called for a clear anti-poverty strategy with outcome related objectives and targets, with an attached ring-fenced budget, complementing not replacing, the targeted approach in NTSN. We are disappointed therefore that the method for achieving poverty reduction is reliant only on skewing of resources. This approach has not had the desired effect to date and the Commission urges government to reconsider this position.
5. The Commission welcomes a coherent approach to action planning to reduce poverty which is consistent with the EU NAPs/inclusion approach. However in the absence of any detail on the content of the proposed NI Regional Action Plan, this strategy appears to be little more than an aspirational set of objectives and targets, most of which have no dates for achievement or detail on how government aims to achieve them. The current consultation document actually states *“Using the Northern Ireland Anti-Poverty Strategy framework, an overall coherent strategy for tackling and preventing poverty and social exclusion will be presented”* (page 105 of consultation document). This suggests that government is not at the stage of presenting a coherent strategy. Whilst we recognise the complexity of the issues to be addressed, it is nevertheless frustrating given the time invested to date that consultees are being presented with a strategy that, on government’s own reflection, is not a complete strategy.
6. To further state that the aim of this strategy is simply to join up other initiatives is not acceptable given the impact of poverty and social exclusion on the daily lives of people here. These include:-
  - children and young people, whose life chances are reduced at birth in a family living in poverty;
  - disabled people, some of whom will not be assisted by the dominant priority to create access to employment, as they are not able to work and whose poverty may not be adequately represented in current data sets;

- lone parents, predominantly women who cannot access training and employment without affordable childcare. Given that the childcare infrastructure is already suffering as a result of the reduction in EU funding and no government strategy or budget in place to address this, the consequences could be devastating; and
  - older people who have left the labour market and can neither further improve their own economic situation, such as through further pension contributions, nor live on the inadequate state pensions that they receive. Means testing and benefits given on an ad-hoc basis are not sufficient to keep older people out of persistent poverty.
7. We are particularly concerned that certain issues may be lost as they fall into two strategic documents, so may be fully addressed by neither. For example, child poverty is an issue that needs to be addressed not only in the strategy for children and young people, but should be clearly identified and prioritised in this document. Lead roles and responsibilities should then be clear, with reporting criteria, to ensure that gaps between the strategies don't emerge.
  8. Attention also needs to be paid to the international convention requirements to which the UK is a signatory. Specifically we refer to the articles in the UN Convention on the Rights of the Child and the associated obligations for the signatories, which are relevant for an anti-poverty strategy.
  9. The Commission in general notes the recent trend to present strategies, vital to addressing inequalities, conflict and social exclusion, with a commitment to producing "action plans" at a later date. This has been the case with the race equality and gender equality strategies. In the absence of a coherent strategy on these issues, it is difficult to support proposals given. Whilst the document has provided clarity in terms of the role of NI in the NAPs/ inclusion process but it gives no further insight into what an anti-poverty strategy for Northern Ireland will look like.
  10. The document recognises that one of the key issues for concern raised by the review of NTSN was "*a wide range of*

- definitions of “social need” was found within departments”* (para 3.7). In the absence of a clear definition of poverty, which is absent from the proposed strategy, the same problem will arise.
11. Whilst the document recognises the impact of the conflict on poverty, it is difficult to see what is being proposed in terms of the identified priorities and objectives.
  12. The Commission agrees with the key and common concerns arising from the external assessment of NTSN as outlined in para 3.17 and is concerned that some of them have not been taken on board in the final document. These include:-
    - the absence of linkages with other strategies, including Priorities and Budget, “A Shared Future”.
    - the lack of a central budget to augment the skewing of resources.
    - The lack of community development and social economy considerations
    - the lack of learning from or commitment to North-South liaison on poverty issues given the correlation on issues to be addressed
  13. In particular, the Commission rejects the view of the Northern Ireland Civil Service that it “cannot assess high level strategies” for equality. We have recognised the challenges inherent in subjecting high level policies to full EQIA but have consistently stated that we expect to see evidence of EQIA, as the key equality mainstreaming process, being used to ensure that: equality is being effectively promoted; there has been meaningful and inclusive consultation; adverse impacts have been identified and mitigated or justified. In our initial response to this consultation, we stated that “*The Commission believes a fuller assessment of New TSN could have been undertaken. As is stands the consultation proposes links between New TSN and Section 75 but fails to provide for adverse impact now or in the future. The Commission would welcome a commitment to produce an annual report on the Monitoring of New TSN as per stage 7 of the EQIA process*”.

14. It is the experience of the Commission that high level policies and strategies that do not take adequate account of equality considerations at the earliest stages pose fundamental equality issues at the lower policy levels. The Commission urges government to reconsider this position.

### **Specific Comments**

15. The key strategic aim of any anti-poverty should be to reduce poverty, clearly defined, by a % within a realistic but ambitious timescale. The longer term priority of eradicating child poverty is already a commitment of government and this will not be met if interim, measurable targets are not set now.
16. In relation to the Commission's views on focusing on financial exclusion, these have already been presented in our previous submission and outlined in particular in paragraphs 4 and 5 of the attached document.
17. The Commission supports the concept of wider capacity building but recognises that this much more than simply co-ordinating efforts. It also requires a clear strategy a budget to deal with the withdrawal of significant EU funding in 2006.
18. In relation to other priorities that should be included, the Commission has already identified and submitted these in our previous response to consultation on this issue.
19. The Commission has previously noted concerns about the effectiveness of PSI working groups and outlined in our previous response to this consultation what government should take account of if progressing a new PSI working group.
20. The Commission welcomes the regional action plan consistent with European commission recommendations but strongly believes that it should have formed the "backbone" of this strategy and its absence is striking.

21. The Commission has consistently stated that the “skewing” approach should be augmented by a “ring-fenced” budget. This position remains.
22. The Commission welcomes the leadership that can potentially be derived by a Ministerial lead Forum and calls for this group to be outcome focused to achieve the necessary change.
23. In relation to the equality considerations, the Commission’s view is outlined in paragraph 13 above.
24. In relation to the proposed targets, the Commission would welcome further engagement on this, including discussion on target dates and methods for achieving them

## **Conclusion**

25. The Commission welcomes the change in approach to a new anti-poverty strategy but has genuine concerns about the lack of a targeted budget; the dominance of focus on financial exclusion which does not take account of other inequalities that lead to poverty; the lack of adequate links with other strategies and the lack of reporting on equality impact assessment.
26. The Commission is particularly concerned with the lack of a coherent strategy at this stage as the document implies that it is one aspect of a wider strategic framework – this is not a strategy and too many questions remain unanswered. In particular, concerns raised in relation to a lack of poverty proofing approaches and gender mainstreaming as outlined in our initial response to this consultation have not been adequately addressed.
27. Given the above, it is difficult to assess how this additional document will facilitate the development of more coherent anti-poverty strategy that will deliver and make tangible differences to the people of Northern Ireland.

28. In conclusion therefore the Commission reiterates some of our earlier recommendations that we do not consider have been adequately taken on board:-

- Social need arising out of the conflict is explicitly addressed;
- A recognition of the interdependence of good relations, equality and poverty;
- More emphasis on the extent of inequality faced by those at risk of poverty;
- That the strategy draws more on the experiences of international, European, Irish and UK developments;
- Consideration is given to a clear definition of poverty;
- Greater prominence is given to institutional change with high level political and civil service leadership;
- That those who directly experience are engaged with;
- A system of poverty proofing, alongside gender mainstreaming is developed;
- An examination is undertaken of the profile and quality of paid work;
- A clear indication of how this strategy fits into other government initiatives;
- A recognition of the role of the private, voluntary and community sectors in this debate;
- A wider definition of financial exclusion is considered;
- A commitment to poverty proof benefit levels;
- A wider range of priorities such as education are included;
- An uprating mechanism for the National Minimum Wage is adopted;
- PSI groups need to be properly resourced and with high level leadership;
- Continuation of the skewing of resources with a clearly defined **additional** budget.

**Policy and Development**  
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