

Priorities for Youth Consultation  
Youth and Schools in the Community Team  
Room 401  
Department of Education  
Rathgael House  
Balloo Road  
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Equality Commission

FOR NORTHERN IRELAND

07/12/2012

The Equality Commission for Northern Ireland welcomes the opportunity to respond to the consultation on **Priorities for Youth, Improving Young People's Lives through Youth Work**

In our ongoing routine engagements with the Department and in the advice we provide, the core themes of equality of opportunity and good relations provide the framework for our work.

The review of the youth work provisions provides the opportunity for the Department to show its commitment to the positive impact that youth work can have in bringing diverse groups of young people together to maximise equality of opportunity and good relations and we make our response with this as our foremost concern.

In 2010 the Department published its 'Community Relations, Equality and Diversity Strategy'. At that time we highlighted our concerns<sup>1</sup> in relation to the funding being applied by the Department to the Youth Service and the approach being adopted to the promotion of equality and good relations.

We note with concern that these issues are still pertinent and we take the opportunity to highlight these and other key issues in appendix A (attached).

We are happy to meet with Department officials to clarify or develop our comments further if required.

Yours Faithfully



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<sup>1</sup> [ECNI Response to CRED policy](#) 2010

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## Appendix A: Response to Priorities for Youth

### 1.0 General Comments and observations

- 1.1 The Commission has actively promoted the concepts of equality of opportunity and good relations with the Department, including over recent years. Building on our 2007 Statement of Key Inequalities<sup>2</sup> document we further developed a thematic approach via Every Child an Equal Child<sup>3</sup>; and via our co-authored good relations challenge paper for schools 'Ensuring the good relations work in our schools counts' in 2010<sup>4</sup>.
- 1.2 In 'Every Child an Equal Child', the Commission set a vision for children based on three overarching objectives:
- every child has equality of access to a quality educational experience,
  - every child is given the opportunity to reach his or her full potential,
  - the ethos of every school promotes the inclusion and participation of all children.
- 1.3 We consider that the current consultation document gives insufficient prominence to the concept of equality and rights being at the core of youth service provision. If this is contrasted with the key principles set out in the Department's 'Every School a Good School: A Policy for School Improvement'<sup>5</sup> (which sets equality of opportunity and the child at the centre of the education process) there would appear to be an apparent disconnect between the overall education policy framework and the specific youth framework.
- 1.4 We believe that the strategy should be clear from the outset that it is equality focussed and is concerned with giving practical application to international obligations, such as those under UN Convention on Rights of the Child<sup>6</sup> and the UN Convention on the Rights of Persons with Disabilities (UNCRPD)<sup>7</sup> We also note that there is little consideration of either differential needs of different genders or a particular focus on the differential needs of particular racial groups. **We would therefore advise the Department** to ensure that both the obligations of the Convention for the Elimination of Discrimination against Women (CEDAW)<sup>8</sup> and of the Convention on the Elimination of Racial Discrimination (CERD)<sup>9</sup> are addressed through this strategy.
- 1.5 The current consultation document appears to set the context for youth work as *education in a less formal environment*, as part of wider Education Policy. While we recognise that youth work can be *educative*, we believe that this

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<sup>2</sup> [Key Inequalities](#) ECNI 2007

<sup>3</sup> [Every Child an Equal Child](#) ECNI 2008

<sup>4</sup> [Ensuring the Good Relations Work in our Schools Counts](#) CRF 2010

<sup>5</sup> [ESaGS](#) 2009 p5

<sup>6</sup> See [Guiding Principles of the UNCRC](#) esp. Art 3

<sup>7</sup> [UN Convention on Rights for People with Disabilities](#) esp. Arts 8(2)b and 24

<sup>8</sup> [CEDAW](#) 1979

<sup>9</sup> [CERD 1969](#)

approach could serve to limit the wider potential of youth work. In noting the ETI focus on outcome measurements<sup>10</sup>, we consider that measures beyond educational attainment may also be appropriate.

- 1.6 The clear statement from the Minister in his foreword to the document makes clear the potential of youth work with regards to advancing community relations, equality and diversity<sup>11</sup>. It is thus of particular concern to the Commission, that the screening exercise on this policy sought to merely avoid negative impacts on the equality grounds. The Commission reminds the Department that the s75 duties are positive and the Department should reconsider this policy as a framework to better promote equality and good relations.
- 1.7 **The Commission recommends** that the Department takes account of the direction set out in the Programme for Government, specifically recognizing an emphasis on young people's health and well-being alongside their education, skills and training<sup>12</sup>.
- 1.8 The following section will address specific areas of the strategy that we have concerns with, in particular the actions that are proposed to flow from the strategy.

## 2.0 Specific Comments

### Strategic Aims

- 2.1 Section 3 of the consultation document sets out strategic aims and proposed ways of achieving these. The Commission notes that there is no mention of the equality and good relations elements that could be included in such a strategy. There also appear to be internal tensions between the aims of the strategy as stated and the means of achieving these. At 3.1 the informal nature of provision is stressed, while the first aim is stated as closing the performance gaps between children and young people. The emphasis on closing gaps and performance measurement may be difficult to reconcile with the voluntarist nature of youth work, and the nature of many of its outputs.
- 2.2 Paragraph 3.1 of the consultation also notes the aim of inclusivity, while 3.2 refers to targeting. We have previously argued for inclusion and mainstreaming in education work, whereas the approach being advocated has the potential to residualise youth work, making it a service concerned only with crisis or problem interventions, and further compartmentalise 'problem children or youth'. This could contribute to the isolation of specific children, preventing their integration with other children. There is a need for clarity on the part of the Department on how these apparent tensions will be managed.

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<sup>10</sup> [Priorities for Youth](#) para2.9 see also appendix 3

<sup>11</sup> [Priorities for Youth](#) 2012 para 2.5 The Minister links the overall Youth work and CRED policies explicitly

<sup>12</sup> [PFG](#) Themes 1,2 and 3 specifically recognise the importance of health and wellbeing.

## Principles for Youth Work

- 2.3 Section 3.3 sets out nine separate underpinnings for the strategy. The focus appears to be on management and regulation, with the concept of being child/young person focussed only appearing in the second from last principle. We believe that this is the wrong emphasis and should be addressed.

## Priorities

- 2.4 The delineation of service provision along the age lines proposed also appears arbitrary, with no evidence provided to support the proposals. None of the age band programs appear to have any specific justifications attached to them and on that basis we have difficulty in commenting further than to say these proposals must be grounded, and fully evidence based. We also note that the emphasis on the 18+ target group '*will be either issue based programmes or volunteering and leadership opportunities*'<sup>13</sup> This again sets the scene for dealing with problems rather than providing a service that allows for social interaction, and develops well-rounded, confident individuals.
- 2.5 Priority 1 and Priority 2 focus on raising standards and closing performance gaps, and additionally propose the withdrawal of services to those in the age 22 to 25 band except in extremis. The Commission will not support the withdrawal of a service from young people purely on the grounds of age. We are not aware of evidence adduced to support this proposal, beyond a reference to the need for economy. 'Need', the core of the targeting approaches being advocated, does not appear to have been assessed for this age group.
- 2.6 At paragraph 4.7 a list of priorities is set out that broadly corresponds with some of the s75 categories, however there is little attempt made to analyse particular needs for particular groups. There is no mention of 'newcomer' children and their particular needs (including linguistic needs); Traveller children's need for and/or use of the existing youth service; nor any disaggregation of the relative needs of males and females. Gender as a group designation is entirely missing from the list of categories. Careful consideration should be given to the specific needs of specific and minority groups if the Department is intent on targeting resources.

## Funding Mechanism

- 2.7 The formula approach to funding and the cap on NI wide providers may be problematic. A number of schemes such as Action for Children, Bardardos, and the Disability sector all run province wide schemes for children and young people. The establishment of an arbitrary cap may thus impact on provision of services to minority or groups with particular needs that might otherwise be possible via NI wide economies of scale. The Commission recommends that such potential impacts are given full consideration.

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<sup>13</sup> Ibid Priorities for Youth p19

### 3.0 Conclusion

- 3.1 We consider that the current consultation document gives insufficient prominence to the concept of equality and rights being at the core of youth service provision. We believe that the strategy should be clear from the outset that it is equality focussed and is concerned with giving practical application to international obligations.
- 3.2 There does not appear, from the evidence adduced, to have been a systematic evaluation of existing provision and an assessment of where this can be improved either generally or with regards to promoting equality and good relations. Partnership arrangements which can be strategically arranged through NI wide organisations do not appear to have been given a significant profile, and the cap on funding arrangements may have further equality impacts.
- 3.3 There does not appear to be sufficient internal coherence within the document itself or in its relationship with the wider DE policy framework and its focus on advancing equality and these tensions will need to be addressed before a meaningful action plan can be developed.
- 3.4 The tone of the document is set in the context of further education rather than on personal development. The current document is based on targeting resources. The history of youth provision in Northern Ireland has been one of inclusiveness rather than targeting. As noted at para 1.2 of the consultation:
- “The uniqueness of youth work is that young people, of all abilities and of often diverse interests, choose to participate regularly in a part of the education system that is less formal than school but no less important in terms of learning and development”<sup>14</sup>*
- 3.5 Again we stress the need to actively and positively promote equality and good relations, not merely avoid having a negative impact on them. Further, we consider that area of work provides a clear opportunity to regularly engage with children and young people across the full range of equality categories.

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<sup>14</sup> [Priorities for Youth](#) para 1.2