



23 July 2013

Department of Enterprise Trade and Investment
Financial Capability Branch
Room 53
Netherleigh
Massey Avenue
BELFAST
BT4 2JP

TO WHOM IT MAY CONCERN

Re: Department of Enterprise Trade and Investment: Taking Control - A Financial Capability Strategy for Northern Ireland Policy Consultation

The Equality Commission for Northern Ireland welcomes the opportunity to respond to the above-mentioned consultation document. We wish to acknowledge the wide range of steps that the Department has taken and further proposes to encourage knowledge and awareness of financial capability initiatives to support disadvantaged and marginalised groups.

The Commission acknowledges the Department's analysis of the need to develop financial capability initiatives for those individuals on low income (those in receipt of benefit and/or low pay) in the context of the equality impacts likely to arise from the current economic situation and the related welfare reform proposals and rationalisation of public services.

In particular, we welcome the proposed cross-departmental approach and the engagement with the community and voluntary sector and independent advice agencies in the delivery of the Financial Capability Strategy.

Furthermore, we acknowledge the general policy context within which the Strategy will be delivered, including the link to key Programme for Government commitments such as the Fuel Poverty Strategy, the Child

Poverty Strategy, the Social Investment Fund and the initiative to tackle rural poverty and social and economic isolation.

Taking account of the consultation questionnaire, we wish to make a number of recommendations which we believe, if taken into account, will enhance the potential outcomes from the Financial Capability Strategy.

Policy Context and Strategy Vision

The Commission considers that account should also be taken of the Executive's Disability Strategy, 'A Strategy to improve the lives of people with disabilities 2012 – 2015'¹. We note that the Financial Capability Strategy references the need for digital inclusion, which is also a work stream associated with the Disability Strategy. However, given that disabled people have been identified as one of the key target groups in relation to the need for financial capability support, other key work streams from the Disability Strategy such as the advocacy and awareness initiative to enhance the participation and involvement of disabled people in the ongoing review and development of the strategy should also be given meaningful consideration.

The Commission strongly recommends that reference is made to the United Nations Convention on the Rights of Persons with Disabilities (CPRD). The corresponding relationship between the Strategy and specific articles within the CPRD should be referenced, including key articles such as Articles 19, the right to independent living, and Article 28, the right to an adequate standard of living and social protection.

Health, Social Care, and Welfare Reforms

Whilst the consultation paper properly identifies the link between economic hardship and health and wellbeing, account should also be taken of relevant health-related policy initiatives such as 'Transforming Your Care'² and 'Reform of Adult Health and Social Care'³. A key intended outcome of these initiatives is to move towards supporting greater numbers of people to live in community rather than in residential

¹ Office of the First and Deputy First Minister (January 2013): *A Strategy to improve the lives of people with disabilities 2012 – 2015*. Available at:

<http://www.ofmdfmi.gov.uk/index/equality/disability/disability-strategy-2012-2015.htm>

² Department of Health and Social Services and Public Safety, (January 2013): *Transforming Your Care – A Review of Health and Social Care in Northern Ireland*. Available at:

<http://www.dhsspsni.gov.uk/tyc.htm>

³ Department of Health and Social Services and Public Safety, (March 2013): *Who Cares? The Future of Adult Care and Support in Northern Ireland – Consultation*

<http://www.dhsspsni.gov.uk/showconsultations?txtid=58501>

settings. It is highly likely that significant numbers of people affected by these changes, whose current financial circumstances are managed by statutory agencies, will be in need of financial capability services, particularly older people and disabled people.

Strategy Time-frame

Given the delay in the implementation of the 2012 Welfare Reform Bill, the full impact of the reforms are unlikely to be apparent before 2018 the final year of the Financial Capability Strategy.

Likewise, the impact of the further changes to Health and Social Care Provision outlined in the 'Transforming Your Care' and 'Reform of Adult Care Services' strategies are unlikely to be fully understood during the time-frame of the Strategy.

We recommend, therefore, that consideration be given to the extension of the Strategy beyond 2018.

Effective engagement with economically marginalised groups

It is essential that those persons directly affected by this strategy are included in the consultation process⁴. From the evidence presented, strong emphasis has been given to the Department's work with advice agencies and the Community/Voluntary sector. We commend the efforts made by the Department to closely consult with the advice sector and community groups, but it also important to consult directly with affected Section 75 groups including disabled people, lone parents and carers (including children and young people who care for disabled and older members of their family).

Carers and young people leaving care

At present carers in Northern Ireland have no legal entitlement to financial support beyond the Carers Allowance benefit, to which not all carers are entitled. Given that many carers have limited employment opportunities because of their caring responsibilities, the Financial Capability Strategy should consider what additional measures can be taken to assist carers to access additional financial support.

⁴ Equality Commission for Northern Ireland (2010): *Section 75 of the Northern Ireland Act 1998 – 'A Guide for Public Authorities*, paragraph 3, page 37. Available at: <http://www.equalityni.org/archive/pdf/S75GuideforPublicAuthoritiesApril2010.pdf>

The Commission is aware that the Government is currently taking forward legislation in England to provide support to both service users and carers in relation to their rights and entitlements within the framework of social care. One of the key benefits of this framework will be to ensure that the hours worked by carers are paid for and that the cost of informal caring is given proper recognition by the State. Many carers often work unpaid hours due to an informal relationship with service users, often family members. The Commission recommends that the DHSSPS should, as part of their contribution towards the Financial Capability Strategy, consider the introduction of similar measures in relation to Northern Ireland.

Financial capability skills training and other measures should also be considered for young people in the care system, as they are particularly vulnerable to experiencing financial problems upon leaving residential care (where financial matters are dealt with by the statutory service provider).

Multiple Identities

We also recommend that the Department take into account the needs arising from the multiple identities of those within the particular target groups identified e.g. young people with disabilities who have left residential care, those with complex support requirements such as people with learning disabilities, those potential claimants for whom English is an additional language as a result of their ethnicity or their disability e.g. for many deaf people, sign language is the preferred form of communication/their only means of communication.

Allocation of Resources

We acknowledge the need to include a focus on access to statutory support services and to independent advice agencies, such as Advice NI, Citizens Advice Bureau and the Law Centre. Furthermore, we agree that it is important to take into account the United Kingdom-wide strategy for financial capability being developed by the Money Advice Service. However, it is also important that local community groups and local advice agencies are also adequately resourced to provide information and advice services to local communities across Northern Ireland.

We are aware that a number of advice agencies have experienced reductions in funding for advice services at a time when such provision is of critical importance to proper implementation of this Strategy.

Consideration should be given by the Executive to enabling community groups and advice agencies to apply for additional funding from the Social Protection Fund and the Social Investment Fund to enable them to meet the increased demand for financial advice and support as a result of the prevailing social and economic context.

Capacity Building and Partnership Building

A cross-sectoral approach to resourcing financial capability initiatives should also incorporate user led equality based groups and enable them to support their relevant constituencies through the provision of financial capability interventions. Community based capacity building programmes, such as those managed by Gingerbread, University of the Third Age, or more localised projects e.g. the user led capacity building programme 'Choices' managed by the Northwest Forum of People with Disabilities provide opportunities to support economically marginalised groups to develop life skills and a range of other confidence building measures, including knowledge of how to identify and use appropriate information and advice services.

Digital Inclusion

As noted above, the Commission acknowledges the emphasis in the Strategy on the utilisation of new technology.

However, community and voluntary organisations in Northern Ireland report lower internet usage by older people and people with sensory disabilities than by the general population.

A 2011 survey on Internet usage by the Office for National Statistics revealed that, in Northern Ireland, people with a disability (46.3%) were much less likely than non-disabled people (77.4%) to have ever used the internet⁵.

The figures also reveal that Internet usage amongst disabled people here is less than the UK average for people with disability (63.8%).

The Commission recommends that Department should consider the measures and investment necessary to ensure the digital inclusion of disabled people and older people, including the consideration of community based capacity building programmes.

⁵ Office for National Statistics (2011): *Internet Access Quarterly Update 2011, Q1*. The disaggregated figures for disabled people in Northern Ireland contained in the raw data for this survey were unpublished and were obtained by Disability Action from the ONS in May 2011.

Employment Measures

The Commission recognises the importance of creating employment opportunities as a means to address financial hardship and therefore welcomes the NEET's Strategy to support young people in to employment as highlighted in the consultation paper.

We are aware of number of specialist employment programmes designed to support disabled people in to employment such as the Workable NI, Access to Work NI and Work Connect Programme.

At a CPRD evidence gathering workshop, hosted by the Commission and Northern Ireland Union of Supported Employment (NIUSE) in March 2012, which focused on Article 27(Right to Work and Employment) and Article 28 (Right to Adequate Standard of Living and Social Protection), participants highlighted that specialist employment programmes for disabled people did not take account of those individuals with complex support requirements.

According to stakeholders, many work programmes for disabled people focus mainly on supporting people with physical disabilities with less attention being given to those with learning disabilities or those who need a higher level of support to both find work and retain employment.

The Preamble (clause j) to the UN Convention on the Rights of People with Disabilities recognises the need to promote and protect the human rights of all persons with disabilities including those who require intensive support. More consideration is needed to ensure disabled people have access to employment opportunities as a route to financial independence.

Section 75 and Disability Action Plans

The Commission welcomes the broad range of proposed initiatives to support greater financial capability among economically marginalised groups. We recommend that the Department and all other relevant public authorities associated with the Strategy incorporate any actions arising from the strategy including audit of inequalities, targets set and resources allocation within their Section 75 Actions Plans and, where appropriate, their Disability Action Plans.

Conclusion

The Commission would like to commend the Department for the measures it has already adopted in relation to the Strategy, in particular the broad range of considerations given to the issues facing a range of equality groups such as disabled people, lone parents etc.

We hope our comments will be given positive consideration by the Department and contribute to the further progression and development of the Financial Capability Strategy.

Yours sincerely

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Annex 1

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 and treatment, sex discrimination and equal pay, race relations, sexual orientation, disability and age.
2. 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 (Section 75) and to promote positive attitudes towards disabled people and encourage participation by disabled people in public life under the Disability Discrimination Act 1995.
3. 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;
 - keeping the legislation under review;
 - promoting good relations between people of different religious belief and/or political opinion.
4. The Commission, with the Northern Ireland Human Rights Commission, has been designated under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) as the independent mechanism tasked with promoting, protecting and monitoring implementation of UNCRPD in Northern Ireland.