

Equality Commission response to the proposed Delivery Plan for Programme for Government Indicators 19 and 28 (% population living in absolute and relative poverty (before housing costs); self-efficacy)

In January 2016, the Commissions set out a number of priorities¹ for delivery via the work of government over the 2016-21 mandate. The following considers the delivery plan content (version downloaded on 15 November 2016) against the key inequalities and policy priorities highlighted by the Commission in January 2016.

We hope that this information, in tandem with our response to the consultation on the draft PfG, will be of assistance in the further development of the delivery plan.

The Commission continues to stress the need to consider the causes and effects of poverty in conjunction with Section 75 identity.

- a. The Commission has made it clear that there is a need for urgent action to address poverty and social exclusion experienced by a range of equality groups. Whilst socio-economic disadvantage is not a specified ground under the equality legislation, the barriers and inequalities experienced by equality groups can be exacerbated by poverty and social exclusion.
- b. We have also made it clear that we support the proposed indicators relating to tackling poverty and socio-economic disadvantage² to the extent that they can be utilised to address the poverty and social exclusion experienced by a range of equality groups³.
- c. There is however a need to ensure that equality of opportunity and good relations for members of Section 75 categories are also advanced across the PfG as a whole.
- d. We note that the equality screening at Annex A of the delivery plan sets out a range of Section 75 groups adversely affected by poverty. We suggest that this data could be used to help shape the plan to target specific interventions and outcomes. For example, it notes that minority ethnic children are more vulnerable to poverty, but specific actions to address this are not apparent. The same applies as regards religion, gender and dependency status.
- e. In light of planned data development, we suggest that the plan takes account of the potential for data collection across the Section 75 grounds.
- f. We welcome that the existing infographic within the delivery plan demonstrates the benefit of considering poverty across the grounds, and in tackling inequalities through targeted interventions. This point is further supported by paragraph 2.4 which sets out linkages with poverty and education, health and mental ill health.

¹ ECNI (2016), Equality Priorities: [Programme for Government and Budget Recommendations](#)

² For example: reduce poverty; increase economic opportunities for our most deprived communities.

³ ECNI (2016) [PfG Framework - Full Response](#)

- g. The Commission notes the assertion at paragraph 1.6 that: ‘The differences poverty can make to potential can be striking, especially in areas such as education and health.’ In relation to education, we strongly recommend that the consideration of poverty (using free school meal entitlement as a proxy for social disadvantage) is disaggregated by Section 75 category. We recommend that the actions within a revised delivery plan are aligned to tackling poverty and social exclusion experienced across the range of equality categories.
- h. In relation to paragraph 4.5 of the delivery plan, which considers health (healthy life expectancy) and education (economic inactivity) indicators, we note as follows.

1. Reducing health inequalities

- i. Many of the proposals included in the delivery plan are welcome and have the potential to reduce the health inequalities experienced by Section 75 groups. However, there is insufficient detail on how the inequalities experienced by particular Section 75 equality groups will be addressed in the policies, actions and strategies being taken forward by the Department.
- j. In particular, we are concerned there is no explicit reference in the delivery plan to targeting inequalities experienced by lesbian, gay, bisexual people; trans people; Irish Travellers and other minority ethnic communities (including asylum seekers and refugees); and people with learning disabilities. We recommend discrete actions to address this.

2. Reducing Economic Inactivity

- k. We note the interdependency between indicators on health and education and reducing economic inactivity. We recommend a clearer commitment to addressing employment inequalities experienced by people across the Section 75 categories.

Commentary on proposals and interventions within the delivery plan

- l. In relation to the proposals and interventions set out in Section 6 of the delivery plan, while welcoming the actions planned, we make some comments below and identify a number of gaps:
- m. The Digital Literacy Programme targets young people within education. We welcome this for learners. Given the barriers particular groups, including minority ethnic groups, older people and people with disabilities, face with regard to digital accessibility coupled with the growing digital requirements of accessing the welfare system, it is suggested that targeted actions for these groups are also included in a revised delivery plan.
- n. The Commission has recently written to the Minister for Communities drawing attention to its concerns about the findings of the recent Inquiry Report by the United Nations Committee on the Rights of Persons with Disabilities in

respect of the implementation of welfare reform in the United Kingdom⁴. The Committee notes that it has resulted in grave and systematic violations of disabled people's human rights leading to, inter alia, financial hardship: arrears, debts, evictions and cuts to essentials such as housing and food.

- o. We have urged consideration of further measures, in addition to the current time-limited mitigations adopted by the Executive, in order to ensure that vulnerable groups are protected from the adverse impact of welfare reform.
- p. The Commission welcomes, in principle, the proposal to develop a holistic wraparound service. However, we consider that the delivery plan does not include sufficient details of the proposal to enable a judgement to be made as to the extent to which the service will meet any needs resulting from the expiry of the existing but time-limited welfare reform mitigation measures. We therefore recommend that the Executive publish full details of the proposed programme and issue a draft proposal for public consultation.
- q. We welcome the commitment to implement the Active Ageing Strategy and to specifically target benefit uptake, tackling the financial abuse of older people, fuel poverty and digital inclusion. Our draft age policy position also recommends actions to tackle fuel poverty and promote digital inclusion⁵ and we recommend that a revised delivery plan should include actions to advance same.
- r. We welcome the recognition of the importance of high quality childcare in benefiting children from disadvantaged backgrounds. However, we are concerned that there is a lack of specific actions in the PfG to deliver a comprehensive strategy and actions for appropriate, accessible and affordable childcare for the benefit of children and to increase employability⁶.
- s. With regard to actions to improve teenage transitions into adulthood, we welcome the intervention and recommend consideration of the specific issues those in Section 75 groups may experience during this time. This includes in particular focus on young people with disabilities.
- t. As regards the Delivering Social Change Literacy and Numeracy Programme mentioned at paragraph 6.16, we would welcome clarification of what '*we will proactively build on this work*' means, particularly as regards resource commitment and intended impact across Section 75 categories.
- u. In relation to economic inactivity, we have written to the SRO to set out our recommendations relating to employment and people from Section 75 groups,

⁴ Available at:

http://tbinternet.ohchr.org/_layouts/treatybodyexternal/TBSearch.aspx?Lang=en&TreatyID=4&DocTypeCategoryID=7

⁵ ECNI (2016) [Age Equality Policy Priorities and Recommendations](#)

⁶ ECNI (2015) [Response to NIE consultation on draft Childcare Strategy 2015-2025](#)

including the need for accessible and inclusive training and programmes to enable people to access and progress in work⁷.

- v. We recommend that a revised delivery plan includes to advance the above.

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⁷ Specifically our recommendations relating to employment include: support women's economic participation, including through access to appropriate, accessible and affordable childcare; address the exploitation of migrant workers and the concentration of some minority ethnic workers in low paid employment; support people with disabilities to access and remain in the workplace; ensure training and programmes to enable people to access and progress in work that are accessible and inclusive for all.