

Department for the Economy
Skills Strategy
Adelaide House
39-49 Adelaide Street
Belfast
BT2 8FD

By email only: SkillsStrategy@economy-ni.gov.uk

18 August 2021

Dear Sir or Madam

Re: Consultation – draft Skills Strategy for Northern Ireland: Skills for a 10x Economy

1. The Equality Commission welcomes the opportunity to respond to the Department for the Economy's 'Strategy for Northern Ireland: Skills for a 10x Economy'. We welcome the proposed inclusion of *'a 2-5-10 year implementation plan, developed in close collaboration with key stakeholders and designed to adapt to change'* and the acknowledgement for a commitment to introduce multi-year budgets to *'.. underpin strategic planning and the transformational change in our skills system ...'*¹.
2. We welcome the inclusion of 'poverty and disadvantage' within the draft Skills Strategy and continue to stress the need for urgent action to address poverty and social exclusion experienced by individuals across the range of equality categories. The Commission continues to proactively highlight the link between poverty and social exclusion, and the inequalities faced by individuals protected under equality legislation. For example, at every stage of schooling, Northern Ireland's poorest children are likely to do worse, and make less progress than their better-off classmates, with evidence showing that the gap has been widening.
3. We repeat our recommendation that comprehensive equality data should be collected to identify equality impacts and shape targeted actions to advance equality. To inform effective responses, tailored to the specific circumstances and needs in Northern Ireland, we recommend that all key measures within the Skills Strategy are not only tracked in aggregate but also tracked for the impact on individuals from across each of the Section 75 equality grounds.

¹ Department for the Economy (2021). [Skills Strategy for Northern Ireland: Skills for a 10x Economy](#) (Pg 14)

4. The draft Skills Strategy acknowledges (p28) a direct alignment to the Programme for Government's aim of *'improving wellbeing for all by supporting efforts to tackle inequalities ...'*. In the Commission's responses to both the current and previous Programme for Government we highlighted that the removal of barriers to work, including those experienced by women, people with disabilities, older people and minority ethnic workers, will contribute to realising Northern Ireland's full economic potential with improved employment opportunities for all².
5. In addition, the draft Skills Strategy and associated action plans should have a clear commitment to stakeholder involvement, not only in co-design but in the rolling monitoring and review of impacts, particularly across the Section 75 equality categories. There is also a need to ensure a clear commitment, underpinned by the inclusion of robust, outcome focused action measures, to identifying, addressing and monitoring the key inequalities experienced by the Section 75 equality groups, as well as to promoting good relations³.
6. Whilst welcoming the development of *'a skills system which addresses growing inequalities, providing everyone with the access to the education and training opportunities that will enable them to fulfil their potential'* (p15), we are disappointed that the draft Skills Strategy (p8) is limited in the extent to which it acknowledges key areas of inequality. For example, within the three major policy objectives, gender (particularly women in STEM) and age is the sole focus with regard to Section 75 equality groups.
7. We draw to your attention the Commission's *Statement on Key Inequalities in Employment* (2018)⁴, which identified key inequalities in employment for people with disabilities, women, carers, lone parents, those under 24 and those over 50, migrant workers, and Irish Travellers. A number of these and similar points have been highlighted by international treaty bodies – for example on disability and race.
8. The draft Skills Strategy, 'Skills for a 10x Economy' identifies three major policy objectives aligned to three underpinning policy enablers. Our response, in the attached Annex, addresses each policy objective separately and we hope it is of assistance.

Protecting Equality and Human Rights after Brexit

9. The United Kingdom left the European Union on 31 January 2020 with a commitment to ensuring that some of Northern Ireland's equality laws will keep

² ECNI (2021) [Response to the Executive's consultation on a Programme for Government Draft Outcomes Framework](#) and ECNI (2016) [Response to the Executive's consultation on a draft Programme for Government 2016-2021](#)

³ Section 75 also places a duty on public bodies to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

⁴ ECNI (2018): [Statement on Key Inequalities in Employment](#)

pace with any future changes to European Union equality laws. EU law has resulted in changes that have strengthened employment rights in Northern Ireland that have particularly benefited certain Section 75 groups, for example, women. These include enhanced rights for pregnant workers, agency workers and part-time workers and in employment areas such as parental leave and working time. Government should ensure no regression from existing protections and mechanisms⁵.

Equality Screening

10. The Commission notes that the draft Skills Strategy screening document lacks data on the impacts on particular Section 75 groups. For example, around economic inactivity; school leavers in deprived areas not achieving level 2 qualifications; impact on those with low or no qualifications; increased vulnerability of women; and individuals with long-term health conditions. More broadly, any data that is included in the document should be referenced with links provided to the source.
11. In addition, to ensure transparency, inclusion of additional information on the specific proposed aims and objectives of new groups, such as the Skills Diversity and Inclusion Sub-Committee, and the Shadow Diversity and Inclusion Sub-Group would be beneficial.
12. Please feel free to contact me if a discussion of any of the points raised would be beneficial.

Yours faithfully



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⁵ ECNI (2021) - [Protecting Equality and Human Rights After Brexit](#)

**Skills Strategy for Northern Ireland:
Skills for a 10x Economy**

18 August 2021

1 Introduction

- 1.1 The Equality Commission welcomes a range of commitments in the Department for Economy's draft Strategy for Northern Ireland Skills for a 10x Economy, including the development of an implementation plan in collaboration with stakeholders; the use of multi-year budgets; and the inclusion of poverty and social disadvantage. We repeat a number of our recommendations, including the need for urgent action to address poverty and social exclusion experienced by the range of equality categories, and the collection of comprehensive equality data to identify equality impacts and shape targeted actions to advance equality. We are disappointed that the draft Strategy is limited in the extent to which it acknowledges key areas of inequality.
- 1.2 The Commission's *Statement on Key Inequalities in Employment* (2018)⁶, identified key inequalities in employment for people with disabilities, women, carers, lone parents, those under 24 and those over 50, migrant workers, and Irish Travellers. A number of these and similar points have been

⁶ ECNI (2018): [Statement on Key Inequalities in Employment](#)

highlighted by international treaty bodies – for example on disability⁷ and race⁸.

- 1.3 During the COVID-19 pandemic, we noted⁹ the potential for the pandemic to exacerbate existing inequalities. For example, young people affected by the disruption of their education or suspension or termination of employment during the COVID-19 pandemic¹⁰. In addition, we highlighted the exacerbation of employment inequalities on the basis of gender¹¹, race¹²,

⁷ The UN Committee on the Rights of Persons with Disabilities, in its [concluding observations](#) (2017) on the initial report of the UK on compliance with the Convention on the Rights of Persons with Disabilities, recommended (at paragraph 57) 'that the State party, in close collaboration with organizations of persons with disabilities..

(a) Develop and decide upon an effective employment policy for persons with disabilities aimed at ensuring decent work for all persons with disabilities, bearing in mind the State party's target of 1 million jobs for persons with disabilities, and ensure equal pay for work of equal value, focusing especially on women with disabilities, persons with psychosocial and/or intellectual disabilities and persons with visual impairments, and monitor those developments;

(b) Ensure that reasonable accommodation is provided to all persons with disabilities who require it in the workplace, that regular training on reasonable accommodation is available to employers and employees without disabilities, and that dissuasive and effective sanctions are in place in cases of denial of reasonable accommodation;

(c) Ensure that the legal and administrative requirements of the process to assess working capabilities, including the Work Capability Assessment, are in line with the human rights model of disability, that those who conduct the assessments are qualified and duly trained in that model, and that the assessments take into consideration work-related as well as other personal circumstances. The State party must ensure that the adjustments and support necessary to access work, as well as financial support, are provided and that they are not subject to sanctions or conditional upon carrying out job seeking activities...'

The Equality Commission for Northern Ireland, together with the Northern Ireland Human Rights Commission, has been designated as the Independent Mechanism for Northern Ireland to promote, protect and monitor the implementation of the United Nations Convention on the Rights of Persons with Disabilities in Northern Ireland. Further information about the work of the Independent Mechanism, is available [here](#)

⁸ The UN Committee on the Elimination of all forms of Racial Discrimination, in its [concluding observations](#) (2016) on the combined twenty-first to twenty-third periodic reports of the United Kingdom of Great Britain and Northern Ireland, whilst welcoming the increased rate of employment of individuals from ethnic minority groups, remained concerned at: (a) the higher rate of unemployment among persons of African and Asian descent; (b) occupational segregation, with a concentration of persons from ethnic minorities in insecure and low-paid work; and (c) discriminatory recruitment practices by employers. The Committee recommended that the State party collect disaggregated data on employment, unemployment and activity rates of individuals from ethnic minority groups, throughout its jurisdiction, and that it adopt and implement targeted measures to address unemployment, occupational segregation, and discriminatory practices with regard to recruitment, salaries, promotions and other conditions of employment (paragraphs 32-33, page 8).

⁹ ECNI (07.07.20) [Data is a key component in tackling the impacts of COVID-19 pandemic](#)

¹⁰ ECNI (2020) [COVID-19 and Education: Equality Considerations](#)

¹¹ ECNI (2020) [Childcare Strategy – Equality Commission response to Dept of Education update on progress \(equalityni.org\)](#)

¹² ECNI (2021) [ECNI - Racial equality - a need for ongoing action \(equalityni.org\)](#)

disability¹³ and pregnancy / maternity¹⁴. [Taken from paras 3.2 & 3.3]

2 Tackling Inequalities

- 2.1 We welcome the intention to establish a 'Diversity and Inclusion' sub-group be created to consider how issues related to gender and other diversity issues can be better addressed across education, skills and employment policies and practices.
- 2.2 We consider that such a group could provide a support and challenge function, with members who have skills relevant expertise / experience spanning relevant inclusion issues or groups, offering support and challenge to Departmental Officials, and the NI Skills Council as relevant, with regards to improving the targeting of key actions to overcome barriers and develop enablers to participation and securing key outcomes
- 2.3 We recommend the full involvement of target groups to inform the development, delivery, monitoring and review of the strategy. As such, members should be identified from key organisations, working in relevant areas, who are directly representative of the full span of equality grounds and groups therein.
- 2.4 More broadly, we repeat our general recommendation that comprehensive equality data should be collected to identify equality impacts and shape targeted actions to advance equality.
- 2.5 In terms of diversity and inclusion – we recommend that the data used for all key measures across the Strategy should also be broken down to consider if any equality groups are performing less well /benefitting less than others. Actions can then be targeted to those particular groups and their related barriers / enablers - to the benefits of not only the members of those equality groups, but also to the overall headline measure(s) and the overall success of the strategy itself.

¹³ ECNI (2020) [ECNI - Blog - People with disabilities must not be left behind by response to COVID-19 \(equalityni.org\)](#); [ECNI - News, Press Releases, Equality Commission, Northern Ireland \(equalityni.org\)](#)

¹⁴ ECNI (2021) [ECNI - 'View from the Chair' - Pregnancy and Maternity in the Workplace \(equalityni.org\)](#)

- 2.6 Overall, our general advice is that all key measures should not only be tracked in aggregate, but also for the impact on individuals from each of the equality grounds¹⁵.
- 2.7 As such key measures, including work quality indicators should therefore also be broken down and considered by equality group.

3 Objective: Addressing Skills Imbalances, Driving Economic Growth

Proposed Commitment 1: We will examine the potential to mainstream remote learning provision in key areas of essential skills, employability skills and digital skills for individuals and employers.

Young People

- 3.1 The draft Skills Strategy referenced that as a result of COVID-19 ‘the worst affected sectors employ proportionately more people aged under 25 on average, meaning young people’s exposure to the economic impact of the crisis is considerable’, and the ‘need to engage individuals with low or no qualifications’.
- 3.2 The Commission **recommends co-ordinated action to provide effective targeted action and support to reduce the proportion of young people who are Not in Education, Employment or Training (NEET)**¹⁶ and young people affected by the disruption of their education or suspension or termination of employment during the COVID-19 pandemic¹⁷. The Commission has noted¹⁸ the potential for the pandemic to exacerbate existing inequalities. In this regard, targeted action and support is needed for those who may face additional barriers to training and the labour market due to their particular Section 75 identities. For example lone parents, who are predominately women¹⁹, may require assistance with childcare, while disabled people may require support in relation to

¹⁵ For example see <https://www.equalityni.org/pfg> and <https://www.equalityni.org/equalitydata>

¹⁶ ECNI (2017) [Age Equality: Policy Priorities and Recommendations](#)

¹⁷ ECNI (2020) [COVID-19 and Education: Equality Considerations](#)

¹⁸ ECNI (07.07.20) [Data is a key component in tackling the impacts of COVID-19 pandemic](#)

¹⁹ Dr Russell, R. (Jun 2014) [Census 2011: Key Statistics at Northern Ireland and LGD level](#)

transport, additional costs and/or securing reasonable adjustments.

- 3.3 During the pandemic **we repeated our call for the development of a Childcare Strategy**²⁰, and highlighted the exacerbation of employment inequalities on the basis of gender²¹, race²², disability²³ and pregnancy / maternity²⁴. The pandemic has demonstrated the fundamental importance of childcare and early-years support in facilitating the economic participation of parents / carers, and ensuring the development and progression of children from a range of equality categories²⁵.
- 3.4 The loss of formally taught education due to lockdowns has exacerbated inequalities²⁶. In the Northern Ireland context, this may impact upon a range of groups including males and those entitled to free school meals, particularly Protestants, and notably Protestant males.
- 3.5 In addition, children and young people encountered barriers to accessing usual levels of specialist support services This included, for example, those with special educational needs or disabilities; those in need of language or wider support – including Traveller, Roma and Newcomer children; or those with traditionally lower attendance rates²⁷.
- 3.6 **We recommended action to identify and mitigate potential negative equality impacts arising from reduced access to formally taught education.** Action should be taken, in collaboration with learners, their families, and the broader community, to identify and address key equality issues, including any associated with:

²⁰ ECNI (2020) [Childcare Strategy – Equality Commission response to Dept of Education update on progress \(equalityni.org\)](#)

²¹ ECNI (2020) [Childcare Strategy – Equality Commission response to Dept of Education update on progress \(equalityni.org\)](#)

²² ECNI (2021) [ECNI - Racial equality - a need for ongoing action \(equalityni.org\)](#)

²³ ECNI (2020) [ECNI - Blog - People with disabilities must not be left behind by response to COVID-19 \(equalityni.org\)](#); [ECNI - News, Press Releases, Equality Commission, Northern Ireland \(equalityni.org\)](#)

²⁴ ECNI (2021) [ECNI - 'View from the Chair' - Pregnancy and Maternity in the Workplace \(equalityni.org\)](#)

²⁵ ECNI (2020) [Childcare Policy Position. Update August 2020.](#)

²⁶ ECNI (2021) [COVID-19 and Education: Equality Considerations. Policy Position Paper](#)

²⁷ Education Endowment Foundation (2021) [Best evidence on impact of COVID-19 on pupil attainment](#)

- The loss or reduction of access to full-time formally taught provision with trained teaching and/or support professionals.
- The extent to which supports including specialist equipment, personal care or assistants for children with SEN and disabilities will be in place outside of formally taught environments (schools, including special schools or further or higher education settings);
- Any impact of reduced social interaction with peers and teaching professionals, including for those requiring specialist or language support²⁸.

Disability

- 3.7 The Commission **recommends that the Government take positive steps to close disability equality gaps in employment**²⁹. People with a disability are more likely to be not working and not actively looking for work (economically inactive) than people without disabilities; consequently, they are much less likely to be in employment than people without disabilities. In addition, the gap in the employment rate between people with and without disabilities is persistent, having shown little change between 2006 and 2016³⁰.
- 3.8 For people with disabilities, gaps in educational attainment may partially account for the large employment gap between people with and without disabilities. However, even when attainment is accounted for, participation in employment is still lower for people with disabilities than non-disabled people with equivalent qualifications³¹.
- 3.9 Among people with disabilities, people with mental health issues and/or a learning disability are less likely to be employed compared to people with hidden disabilities, progressive or other disabilities, physical disabilities and / or sensory disabilities³².

²⁸ ECNI (2020) [COVID-19 and Education: Equality Considerations. Policy Position Paper](#)

²⁹ UK Independent Mechanism: [Disability Rights in the UK](#), paragraph 54, pages 17-18.

³⁰ ECNI (2018): [Key Inequalities in Employment](#), paragraph 4.4, pages 24-25.

³¹ ECNI (2018): [Key Inequalities in Employment](#), paragraphs 4.5-4.6, page 25

³² ECNI (2018): [Key Inequalities in Employment](#), paragraphs 4.13-4.14, page 27.

Over 50s age group

- 3.10 In Northern Ireland the share of people classed as long-term unemployed is higher for the over 50s age group. The Commission **recommends that the Departments for the Economy and Education should work in partnership to deliver co-ordinated actions to reduce long-term unemployment amongst older people**³³.
- 3.11 Targeted action is needed to tackle perceived and actual barriers facing older people in returning to, and remaining in, work – including with regard to stereotypes; life-long learning and education; training and development opportunities; and pathways to work.

Young Carers

- 3.12 Research undertaken in England³⁴ showed that young carers obtained lower levels of educational attainment at GCSE level, equivalent to nine grades³⁵ lower than their peers. This disadvantage has been found to continue with 75% of 16-18 year old carers spending time not in education, employment or training (NEET), compared to 25% of their non-carer peers³⁶. There is no reason to suggest that Northern Ireland is different from the rest of the United Kingdom.
- 3.13 The Commission **recommends the Education and Health Departments work in collaboration to identify young carers and provide services to both support them and improve their educational outcomes**³⁷. DfE should consider how a Skills Strategy for Northern Ireland can contribute to addressing inequalities in this area.

Juvenile Justice Centre

- 3.14 Education is crucial to providing young offenders with the skills and training they need to improve their life chances and assist in reducing reoffending. Despite this, children and young people in the juvenile justice centre (JJC) in Northern Ireland have historically not had the same access to the full education curriculum as their peers.

³³ Equality Commission NI (2017): Age Equality: Policy Priorities and Recommendations – Full Report

³⁴ Children's Society (2013) ['Hidden from View : the experience of young carers in England'](#)

³⁵ 'the difference between 9 Bs and 9 Cs'

³⁶ Audit Commission (2010) [Against the odds: Targeted briefing – Young carers. London: Audit](#)

³⁷ ECNI (2017) [Age Equality: Policy Priorities and Recommendations](#)

- 3.15 We recommend that children and young people in the juvenile justice centre have access to an appropriate education curriculum³⁸. DfE should consider how a Skills Strategy for Northern Ireland can contribute to addressing inequalities in this area.

Proposed Commitment 3: The outcomes from the 'Transition of Young People into Careers (14 – 19) Project', jointly lead by DE and DfE will be recognised within the new Skills Strategy.

- 3.16 We note the Department for Communities (DfC) development of the 'Employability NI' project and the commitment of the Department for the Economy to work directly with DfC to support collaborative approaches. However, current reporting on government programmes does not track progression through and between different training programmes. The Department should use regular monitoring and disaggregated reporting by equality ground to ensure maximum uptake of opportunities and subsequent progression into employment.

Proposed Commitment 9: Recommendations emerging from the Women in STEM Working Group will be fully recognised in the Skills Strategy and subsequent skills action plans.

Women in STEM

- 3.17 The under-representation of women in industries associated with Science, Technology, Engineering and Mathematics (STEM) was reported in our *Statement on Key Inequalities in Employment (2018)*, areas such as Manufacturing, Transport and Communication, Energy and Water and Construction³⁹.
- 3.18 In addition, young women are less likely to choose to study STEM subjects at further and higher education compared to young men, thus decreasing their availability for high-level STEM jobs, where men outnumber women by nearly three to one⁴⁰. Stereotyping and bias within our culture and particularly within male-dominated engineering and technology sectors,

³⁸ ECNI (2017) [Age Equality: Policy Priorities and Recommendations](#)

³⁹ ECNI (2018) [Key Inequalities in Employment: Statement](#)

⁴⁰ STEM Business Group (2013) Addressing Gender Balance – Reaping the Gender Dividend in Science, Technology, Engineering and Mathematics (STEM). p1. DEL: Belfast

has been cited as one factor presenting barriers for women within these industries⁴¹.

- 3.19 When developing the Women in STEM Action Plan we **recommend the inclusion of support for women’s economic participation, including through access to appropriate, accessible and affordable childcare**⁴².

Gender beyond STEM

- 3.20 Action in the Skills Strategy to address gender equality in economic participation needs to be included beyond women in STEM. The Commission’s Fair Employment Monitoring Report, 2019 reported that women represented 52% of the NI monitored workforce; however, 69% of those in part-time employment were women⁴³.
- 3.21 While part-time working is one of a number of means by which women, lone parents, and carers balance employment with caring responsibilities, it can negatively influence progression in employment⁴⁴, with women, lone parents and carers sometimes perceived negatively for asking for flexible working⁴⁵. Women, lone parents and carers working part-time are also at risk of low pay and precarious employment, as many part-time jobs are typically associated with the minimum wage and atypical contracts⁴⁶.
- 3.22 There is therefore a need to promote flexible working practices and to encourage men to share responsibility for childcare; as well as to address the concentration of women in part time, low

⁴¹ DEL (2013) Addressing Gender Balance – Reaping the Gender Dividend in Science, Technology, Engineering and Mathematics, p11. DEL: Belfast.

⁴² ECNI (2016) [Response to the Executive’s consultation on a draft Programme for Government 2016-2021](#) and (2021) [Response to the Executive’s consultation on a Programme for Government Draft Outcomes Framework](#)

⁴³ ECNI (2020) [Fair Employment Monitoring Report No. 30: Annual summary of monitoring returns 2019](#). See Chart 4: Monitored Northern Ireland Workforce All Employees [%] by Sex, 2019

⁴⁴ ECNI (2018) [Key Inequalities in Employment: Statement](#). See Employers for Childcare (2015) Striking the Balance: the impact becoming a parent has on employment, working life and career. Employers for Childcare: Belfast.

⁴⁵ ECNI (2018) [Key Inequalities in Employment: Statement](#) See Employers for Childcare (2015) Striking the Balance: the impact becoming a parent has on employment, working life and career. Employers for Childcare: Belfast and Carers UK (2016) State of Caring 2016. Carers UK: London.

⁴⁶ ECNI (2018) [Key Inequalities in Employment: Statement](#) See HC Women and Equalities Committee (2016) Gender Pay Gap 2nd report of session 2015-2016 and Joseph Rowntree Foundation (2010) Cycles of poverty, unemployment and low pay. JRF: York.

paid work and to mitigate the impact of rebalancing the economy⁴⁷.

Proposed Commitment 10: We will build on ‘Preparing for Success’, by developing and introducing new measures of careers guidance outcomes and by developing clear, common, transparent and accountable quality standards.

Careers Provision

3.23 Research⁴⁸ cited by the former Departments for Employment and Learning and Enterprise, Trade and Investment, found that: ‘there is a reasonably strong case to be made that careers education, information, advice and guidance-related interventions can and do make a difference in terms of increased levels of personal confidence and self-esteem’. The report also highlighted the positive correlation between information, advice and guidance and increased participation in employment.

3.24 Evidence from successful interventions in other jurisdictions is informative. The Netherlands has one of the lowest numbers of young people Not in Education, Employment or Training⁴⁹. There the policy focus includes a wider societal and economic consideration rather than focusing on the education system alone. Early intervention is used to reduce the number of early school leavers through the use of preventative measures and actions. For example:

- Progression through the education system is supported by career guidance;
- Expert support is provided for students facing personal, family or learning related challenges;

⁴⁷ ECNI (2018) [Key Inequalities in Employment: Statement](#)

⁴⁸ Department for Employment and Learning and Department of Enterprise, Trade and Investment (Apr 2015) [Enabling Success – Supporting the transition from economic inactivity to employment A strategy to tackle economic inactivity in Northern Ireland](#), citing D. Hughes & G. Gration, ‘Literature review of research on the impact of careers and guidance-related interventions’, CfBT Education Trust, 2009

⁴⁹ In 2013 young people NEET in the United Kingdom was 12.6% compared to 4.5% in the Netherlands – figures taken from OECD iLibrary (2014) [Society at a Glance](#): Figure 4.7 ‘more young people are unemployed or inactive and not in education nor in training (NEET)

- Students are encouraged to choose courses which provide opportunities for further study and better employment;
- A more accurate match between the labour market and available training courses is sought; and
- A focus on high quality craftsmanship skills is provided⁵⁰.

Proposed Commitment 11: We will invest in the development of a consolidated portal, providing open access to information on current and forecast labour market skill needs and applicable study/ work opportunities.

3.25 The Commission supports the proposal to ‘align study opportunities with educational outcomes and local labour market needs’. Mentoring, targeted careers advice and wider support for those at, or approaching, school leaving age could help match aspirations to job prospects; encouraging actions to gain required skills and/or deal with any wider issues. A close match between the available training courses and labour market opportunities may also support more direct access to employment⁵¹.

3.26 When investing in the development of a consolidated portal for open access to information on current and forecast labour market, we recommend consideration of the range of potential impacts by equality grounds, such as older people, children and young people and people with disabilities. We refer you to our response to Proposed Commitment 24 on pages 15 and 16 for consideration regarding the development of a Digital Skills Action Plan.

4 Objective: Creating a Culture of Lifelong Learning

Proposed Commitment 14: We will assess the potential for more locally focused approaches, to support DE’s policy interventions in relation to vulnerable children,

⁵⁰ ECNI (2017) [Age Equality: Policy Priorities and Recommendations](#)

⁵¹ ECNI (2017) [Age Equality: Policy Priorities and Recommendations](#)

particularly in areas of high social deprivation. This will include an assessment of how data can be better used to monitor pupil outcomes from education and the efficacy of policy interventions throughout the education system.

- 4.1 We welcome this commitment, including to assess how data can be better used ‘to monitor pupil outcomes from education and the efficacy of policy interventions throughout the education system’. In general we recommend that all key measures should not only be tracked in aggregate, but also for any differences across the full range of equality grounds. DfE should consider how a Skills Strategy for Northern Ireland can contribute to addressing inequalities in this area.
- 4.2 At every stage of schooling, Northern Ireland's poorest children are likely to do worse, and make less progress than their better-off classmates, with evidence showing that the gap has been widening⁵². We **recommend that the action plan to address persistent educational underachievement linked to socio-economic disadvantage promotes collaborative approaches to drive attainment, involving engagement with parents / families / carers and the wider communities of key equality groups**⁵³.
- 4.3 Our 2017 *Statement on Key Inequalities in Education*⁵⁴ found that while overall levels of attainment are increasing, attainment gaps by gender, religion, ethnicity and disability are also widening.
- 4.4 Barriers to accessing education will undoubtedly impact on attainment outcomes. For example, children and young people, including Travellers, Roma and Newcomers and children with disabilities, may be unable to access an education fully due to language, physical accessibility or institutional barriers.
- 4.5 The Commission is mindful of the complex relationships that exist between education and other domains and consideration by Section 75 characteristic would allow for more targeted and effective interventions to be developed. Addressing key

⁵² NI Assembly (2013) Public Accounts Committee Report on Improving literacy and numeracy in schools, 116 /111-15 June 2013 page 8

⁵³ ECNI (2018) [Equality in Education: Policy Recommendations](#). Full Report

⁵⁴ ECNI (2018) [Key Inequalities in Employment: Statement](#)

inequalities will not only require work across a range of Departments, agencies and functions of government, but also by organisations who have responsibilities for, or an interest in, education in Northern Ireland⁵⁵.

Proposed Commitment 15: We will develop a new lifelong learning project and action plan, directly aligned to the achievement of the strategic goals set out in the new Skills Strategy.

Removing Barriers for Individuals and Employers to Adult Learning Opportunities

4.6 When removing barriers to participation in adult learning consideration should be given to ‘recent years have seen declining numbers of enrolments in full time level 4 and 5 courses’⁵⁶. Data indicates that the proportion of people who lack basic or have no qualifications, whilst decreasing for all age groups over time, still remains highest amongst older age groups⁵⁷. This is coupled with a decline in the number of older enrollees in further education⁵⁸.

4.7 Research commissioned by the previous Department for Employment and Learning⁵⁹ viewed learning as life-long and an important factor in increasing employability. However, there remain perceived barriers to education identified by older people, including:

- that traditional teaching techniques are not considered to engage older people;
- the length of time away from studying;
- new digital technologies;
- previous negative experiences of the education system;

⁵⁵ ECNI (2018) [Equality in Education: Policy Recommendations](#). Full Report

⁵⁶ Department for the Economy (2021) [Skills Strategy for Northern Ireland: Skills for a 10x Economy](#) Pg 51

⁵⁷ Burns, S., Leitch, R. and Hughes, J. Research undertaken on behalf of ECNI (Mar 2015) [Education Inequalities in Northern Ireland](#) Table 4.3 Highest qualification proportions by age in the NI population

⁵⁸ Burns, S., Leitch, R. and Hughes, J. Research undertaken on behalf of ECNI (Mar 2015) [Education Inequalities in Northern Ireland](#) Figure 4.4 Share of enrollees on non-accredited courses by age, 2007/08 – 2011/12

⁵⁹ Department of Employment and Learning (Feb 2012) [Removing the Barriers to Learning](#)

- that education establishments and education are for younger people;
- caring responsibilities; and
- stereotypical views regarding older people⁶⁰.

4.8 We acknowledge the proposed commitment and recommend that the Department for the Economy should tackle barriers to older people participating in life-long and further education⁶¹.

Proposed Commitment 16: We will develop proposals for the expansion of childcare support to enable all individuals with parental responsibilities to participate in lifelong learning.

4.9 The Commission welcomed the commitment within the New Decade, New Approach⁶² that the Executive would publish a Childcare Strategy and prioritise the delivery of early education and care initiatives. The Commission also welcomes the focus of the proposed draft Skills Strategy on both child development and parental employment in the context of advancing equality for children, parents and families from a range of equality categories.

4.10 During the COVID-19 pandemic we repeated our call for the development of a Childcare Strategy⁶³, and highlighted the exacerbation of employment inequalities on the basis of gender⁶⁴. The pandemic has demonstrated the fundamental importance of childcare in facilitating the economic participation of parents / carers. Childcare provision is also important in promoting equality between men and women.

⁶⁰ ECNI (2015) [Education Inequalities in Northern Ireland](#) (final report)

⁶¹ ECNI (2017) [Age Equality: Policy Priorities and Recommendations](#)

⁶² New Decade, New Approach (at page 40) commits the Executive, within its 2019/20 PfG priority actions: The Executive will publish a Childcare Strategy and will give immediate priority to developing arrangements to deliver extended, affordable, responsive, high quality provision of early education and care initiatives for families with children aged 3-4.

⁶³ ECNI (2020) [Childcare Strategy – Equality Commission response to Dept of Education update on progress \(equalityni.org\)](#)

⁶⁴ ECNI (2020) [Childcare Strategy – Equality Commission response to Dept of Education update on progress \(equalityni.org\)](#)

5 Objective: Enhancing Digital Skills, Developing Our Digital Spine

Proposed Commitment 24: An expert panel of individuals from business and education will be appointed to develop a specific Digital Skills Action Plan for Northern Ireland.

- 5.1 The Commission recognises the changing emphasis of the labour market towards new technologies⁶⁵. However, the Expert Panel being established ‘to consider the changing digital skills needs of our economy and identify the substantive changes required in digital education⁶⁶’ should consider the range of potential impacts by equality grounds, such as older people, children and young people and people with disabilities.
- 5.2 2020 UK wide data from the ONS⁶⁷ found that there was lower usage of the internet by older people and people with disabilities than the general population. 81.4% of adults with disabilities had used the internet during the previous three months, compared to 92.1% of the general population.
- 5.3 In 2019 Ofcom⁶⁸ reported that coverage of broadband connections vary across Nations. Within Northern Ireland, 6% with a fixed line were unable to receive broadband, of these 19% were in a rural location.
- 5.4 COVID-19 saw a shift to digital based teaching curriculum support materials and we have noted the impact they may have on education. For example, differential access to home computing and/or internet access⁶⁹, which even if available in the home may have needed to be shared with parents / carers or siblings (due to their work or learning needs), may have limited access to teaching / curriculum support materials,

⁶⁵ Department for the Economy (2021) [Skills Strategy for Northern Ireland: Skills for a 10x Economy](#) Pg 79

⁶⁶ Consultation document, page 12

⁶⁷ ONS (Apr 2021) [Internet users, UK: 2020](#)

⁶⁸ Ofcom (2019) [Connection Nations 2019: UK report](#)

⁶⁹ An estimated one million children in the UK do not have access to a device or mobile connectivity at home. IPPR (2020) Children of the Pandemic

and/or opportunities to engage in virtual learning or discussions⁷⁰.

- 5.5 While not disaggregated by age, 2020 data showed that whilst Northern Ireland internet usage has increased by 11 percentage points since 2014, it remains the lowest internet users of any UK region at 88% compared to 90% in Scotland, 90% in Wales and 95% in London and the South East⁷¹.
- 5.6 In addition, as at 2019 Northern Ireland had the lowest coverage of superfast broadband throughout the United Kingdom⁷².

6 Enabler: Investment in the Skills System

Proposed Commitment 34: A ring-fenced skills fund will be developed to provide new opportunities in the labour market and support the skills development of the working age population as we emerge from the COVID-19 pandemic and prepare for the economic changes brought about by our exit from the EU.

- 6.1 We note that the draft Skills Strategy explicitly recognises the potential impact of loss of EU funding, including the Northern Ireland European Social Fund (ESF) but makes no reference the potential impact on Section 75 equality groups. For example, the ESF has assisted with the creation of job opportunities, including for unemployed young people and people with disabilities, and supported an upgrade of skills levels.
- 6.2 We are aware the UK Government has indicated that EU structural funds will be replaced by the UK Shared Prosperity Fund (UKSPF), due to launch across the UK in 2022. We draw to your attention that a number of civil society groups have expressed concern about the lack of detail on the UKSPF's design, the implementation process, the level of funding that

⁷⁰ ECNI (2020) [COVID-19 and Education: Equality Considerations](#)

⁷¹ ONS (Apr 2021) [Internet users, UK: 2020](#)

⁷² Superfast broadband coverage in 2019, Northern Ireland 89%, Scotland 92%, Wales 93% and England 95%. OFCOM (Dec 2019, reissued Mar 2020) [Connected Nations 2019: UK report](#)

will be made available in Northern Ireland and how the fund will operate in practice⁹.

- 6.3 We also recommend that the draft Skills Strategy includes steps to mitigate against any loss of such EU funding affecting particular equality groups, as well as on those working in the voluntary /community sector involved in the delivery of services to people from Section 75 equality groups, who were in receipt of such EU structural funds.