



Northern Ireland Council for Voluntary Action

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NICVA'S response to the
Northern Ireland Draft
Priorities and Budget
2006-2008

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1.0 Introduction

- 1.1 As the umbrella body for the voluntary and community sector in Northern Ireland, NICVA is pleased to have the opportunity to respond to this year's consultation on the draft government priorities and accompanying budget. This is a developing process in which we have participated since the first Programme for Government consulted on by the Northern Ireland Executive in October 2000. It is our impression that consultation on the priorities had been gradually improving with clear attempts being made to take cognisance of comments focusing on the sharpening up of targets, greater coherence and the need for high level objectives. However, this year we and other social partners have felt excluded from the early part of the process by a tokenistic request to organise a consultation event and give views in early July which was simply not feasible. We also feel that the document has become a confusion of lists of priorities and outcomes which do not flow from each other.
- 1.2 This confusion makes it difficult to trace the structure from a vision of Northern Ireland through to high level priorities and then outcome focused targets. Now that the link with the Northern Ireland Executive's original vision statement in the first Programme for Government is irretrievably broken, the 'strategic vision' continues over seven pages when it could once be encapsulated in a paragraph. It is a blur between the context and the vision and leaves the document without a focus. We do welcome, however, the continuing emphasis on high quality public services and on community divisions and disadvantage and the addition this year of sustainable development as a discernible theme running through the document. Next year, when triennial action plans are ready, we look forward to seeing Shared Future actions treated in the same way.
- 1.3 The new priority being placed on children and young people is very welcome, especially given the loss of the Children's Fund and the dire straits some provides of vital children's services have been in in the past year. We welcome this as an example of government listening to the negative effects of decisions in one year and seeking to ameliorate them in the next.

2.0 General Comments on the Budget

- 2.1 This year again the draft budget appears to spell very bad news for the voluntary and community sector. Our experience last year was that, despite intentions that frontline services would not be cut, this has happened. This is the opposite of the stated intention. There have been funding cuts across the sector in organisations working on areas of government policy such as children's services, health promotion and job skills. This does not sit comfortably with Treasury's message that the voluntary and community sector should be more involved in the delivery

of public services, with the Compact between Government and the Voluntary and Community Sector and with the intentions to take a strategic approach to the sector in Positive Steps.

- 2.2 We are in need of a very clear distinction between what is considered as ‘frontline’ or ‘high priority’ in this year’s document and what is considered administrative or low priority. If the voluntary and community sector is the first thing to be cut when belts are tightened then clearly no genuine intention to protect ‘frontline’ services is evident. NICVA welcomed Minister Ian Pearson’s announcement in December 2004 that he was “considering setting up a Delivery Unit to monitor progress” on how efficiency programmes are being implemented. There has since been no announcement on this initiative.
- 2.3 It would be useful to see within each department an indication of where the gains from efficiency savings will be going and which areas are considered high and low priority, particularly now that additional redirection of three and four per cent of resources is required on top of the 2.5% efficiency savings.
- 2.4 The budget and priorities document is really about delivering results for citizens. There are numerous policy initiatives and strategies which also have the same aim but it is virtually impossible to get an overall picture of what is being delivered and its impact on people in Northern Ireland. The annual budget and priorities review is the ideal place to make these links and serious consideration should be given to using this document to get an overall view of what we are aiming for and how we are doing.
- 2.5 It is also difficult to comment on some of the longer-term economic issues as the budget is for three years and yet we are entering into much longer-term financial arrangements such as the Investment Strategy to which resources have to be committed. There remains some ambiguity about anticipated PPP spending. It would be useful to disaggregate exactly what PPP/PFI money is included in the budget, both in terms of overall totals and ongoing finance charges.

3.0 Priorities Section

- 3.1 Government’s stated aim to improve policy making brings us to the question of the evidence base for the policy directions chosen. In this year’s document there is no context section, which seems to have merged into the vision. This goes some small way towards outlining what the situation is under a range of headings, although the evidence presented is reduced from last year, but we still need to know why we have chosen certain things and not others. Why are these particular things prioritised? This kind of decision making must come from the agreed vision. This year’s priorities do not seem to be progressing that process.

- 3.2 NICVA has previously stated that we think it is very important for this annual document to set out a high level vision for Northern Ireland, identify the key policy drivers, identify any major obstacles and take stock of policies already implemented that are making a change (or not) — ie where do we want to go, how do we intend to get there, what might be stopping us and what have we already tried that we can now learn from? Attempts need to be made to clarify the rationale for the whole document and its place in the succession of former documents. We will eventually need an answer to the question ‘are we getting anywhere?’ In this context it is important to seek to develop some kind of consistency in targets and benchmarks so that progress can be identified.
- 3.3 There is a need to engage a wide range of people in the process of consulting on each year’s priorities and budget – this will involve communicating high level priorities and targets simply and clearly. NICVA has suggested in the past the production of some kind of summary document setting out the vision and the key high-level targets. People living in Northern Ireland are really interested in knowing the ten key things government is proposing to do here. This would make an impact on those who have neither the time nor the inclination to tackle the full document.
- 3.4 The second chapter, dealing with priorities, is rather confusing. Government’s ‘strategic priorities’ are given as:
- Economic growth
 - Public sector reform
 - High quality public services
 - A society based on partnership, equality, inclusion and mutual respect.

It is unclear whether these are UK priorities or Northern Ireland ‘strategic priorities’. Government’s ‘public expenditure priorities’ are then mentioned. Again, it is unclear whether these are the priorities just listed or a different set not listed in the document.

- 3.5 We welcome the recognition that government spending needs to “be accompanied by actions to promote self-sustaining economic growth and build a self confident and outward looking community.” We would also urge recognition that government alone cannot deliver these and other sectors, such as the voluntary and community sector have a key role to play.
- 3.6 Key questions which needed to be addressed in determining the strategic direction of this year’s Priorities and Budget are then listed. We welcome the emphasis in this whole document on sustainable development and in particular welcome the recognition in this section that not only does the economy have to be more effective in “creating wealth and reducing poverty” but that in a long-term context of sustainability we “require a radical re-examination of many aspects of business, lifestyles and behaviours.” We look forward to government leading on this process on examining how we live and the choices we make.

- 3.7 The question of how economic and social interventions can promote a settled and stable outcome to the peace process and build equality and social cohesion is a key question for Northern Ireland. It is clear that one consideration has to be a strategic approach, based on *A Shared Future*, rather than a piecemeal approach characterised by reactive and hastily announced special initiatives in certain areas. The triennial action plan to accompany *A Shared Future* should be produced as quickly as possible to provide an agreed framework for action, to avoid the temptation to engage in short-term reactive ‘initiative-itis’.
- 3.8 As we mentioned last year, NICVA also has some concerns with the phrase ‘community cohesion’ which is in common use in other parts of the UK, but in Northern Ireland the term ‘social cohesion’ is preferable as community cohesion could allow for strong but separate or isolated communities. We need to aim for communities which are both cohesive and comfortable with diversity within themselves and outwardly confident in engaging with their neighbours.
- 3.9 We note the emphasis on shifting the balance of funding “towards a more defensible and sustainable level of local revenue and charges in Northern Ireland.” This is echoed in other parts of the document to reinforce the impression that Northern Ireland is not ‘paying its way’. NICVA’s chief concern is to ensure that those in Northern Ireland who are living in poverty or just above the poverty line should not be faced with charges that they simply cannot afford to meet. While many in Northern Ireland have prospered and could well afford to meet new charges, any new system which is introduced must be fair and must protect the interests of the most vulnerable.
- 3.10 There then follows a vision section which, as mentioned above, seems to serve both as vision and context. It is neither a succinct and clear vision nor a contextual presentation of evidence for the priorities.
- 3.11 NICVA welcomes the mention of partnership as an important part of the process of developing the Economic Vision for Northern Ireland and the re-emphasis in the section on the economy that “The imperative of protecting the environment and making economic activity more sustainable should pervade all aspects of this task.”
- 3.12 NICVA agrees that the weaknesses in our education system are fundamentally important in economic development. The inequalities perpetuated by our current system dog many young people through life. There is a wealth of evidence that children who fail the 11-plus are far more likely to perform badly at the age of 16 than those who pass the test, though there are always people who buck the trend. People who fail to get good qualifications at the age of 16 are more likely to leave for unskilled low-paid jobs or unemployment than their peers who get good GCSEs and A levels.

- 3.13 We welcome the emphasis in this document on enhancing the life chances for all children and would restate the evidence from other parts of the world that investment in early years provision does more than anything else to improve life chances and thus the eventual economic contribution of every child. In Nordic countries the extremely high quality, near-universal pre-school care has vastly reduced (and in Denmark virtually eradicated) the impact that a child's socio-economic inheritance has on his or her chances of success in education and subsequently in work. This means that children arrive at school on their first day equally prepared for learning, irrespective of origins.
- 3.14 The issue of 'low esteem given to vocational provision' is one which needs to be tackled, but this seems to be contradicted elsewhere in this document where DEL sets out plans to target access to vocational training on disadvantaged young people. Is vocational training not relevant for other young people and might disadvantaged young people not be capable of taking advantage of academic educational opportunities if the current system were not failing them? This smacks of a two tier system. The 'low esteem' currently given to vocational provision does need to be challenged and not reinforced by making it the obvious avenue for the 'disadvantaged.'
- 3.15 NICVA welcomes the increased focus on economic inactivity, which we have been campaigning for as a key part of an anti-poverty strategy for Northern Ireland. Creative thought and effort along with appropriate support, will need to be put into attempts to encourage the economically inactive into work.
- 3.16 We also welcome the statement in this section that the forthcoming Sustainable Development Strategy will highlight the importance of balancing economic development with social justice and the protection of the environment.
- 3.17 The vision section on society and community begins on a slightly defeatist note by stating that "many aspects of social division will remain intractable as long as the political impasse remains as deep as it is." This fails to recognise the massive role which government spending on public services plays in underwriting division and separation. This can be tackled now, under *A Shared Future*, rather than waiting for all political issues to be resolved.
- 3.18 Again, we welcome the prioritisation of children and child poverty as a 'key issue' and would call for this to form part of the wider anti-poverty strategy for which we are waiting.
- 3.19 The recognition that that a wide variety of interventions is required to tackle issues of sectarianism, racism and paramilitary influence is important. However, the effect of the 2.5% efficiency savings already being felt means that budgets are often being cut in non-statutory work in the very areas where these issues are being dealt with. The fact that no budget is planned for *A Shared Future* also

poses very difficult questions of what meaningful work can take place in neighbourhoods and communities that is not resourced and supported.

- 3.20 There is a somewhat cryptic paragraph in this section referring to equality and Targeting Social Need which states that: “There is a central principle of fair treatment — but against a deep-seated background of distrust, it is vital that the impact of policies and interventions on key sectors of society are considered and are seen to have been considered.” This is mystifying. If it is a reference to special pleading on sectarian terms for various communities then we would restate our view noted above that a strategic approach needs to be taken in lieu of scattered, reactive special initiatives.
- 3.21 It is also surprising that human rights are not mentioned in this section. Indeed, they are absent from the document as a whole, other than one mention towards the end. Last year’s document contained a vision paragraph which at least made mention of human rights. This has now disappeared and the only mention appears to be in the objectives of OFMDFM. We appreciate that the Human Rights Commission is the responsibility of the NIO, whose work is not included in this document at all. However, NICVA believes that the work and budget of the NIO should be included in this document.
- 3.22 We welcome the recognition that it is vital that social and economic policy improve the lives of those suffering from poverty and social exclusion. We will not rehearse our views on an anti-poverty strategy here, suffice to say that targeting the most disadvantaged groups is tackling the symptoms and not necessarily the causes of poverty. We look forward to the publication of “strategic priorities aimed specifically at reducing the gap between the ‘haves’ and the ‘have nots’” and are especially pleased to see the focus on the gap between rich and poor, not just on the poor. It is this very point that makes targeting the most disadvantaged groups only part of the solution as reducing the gap involves structural change that affects those at all levels of the socio-economic scale, not just those at the bottom.
- 3.23 In the section on public expenditure and public service delivery we note that £213m resource releasing efficiencies have been identified for 2006-07 with a further £334m in 2007-08. We reiterate the fear stated above that these will translate easily into cuts passed on to voluntary and community organisations rather than into the rather harder task of internal efficiency savings. NICVA welcomed the announcement in December last year by the then Minister, Ian Pearson, that he was considering setting up a Delivery Unit to monitor progress in efficiency savings. It appears that this has not happened and the idea is not mentioned in this document. We had hoped that this would provide a transparent method of monitoring savings and checking what was being released to ‘front line’ services. We note that the document states that monitoring procedures have been put in place and a progress report will be published later this year. We look forward to seeing the detail of this and would find a definition of ‘frontline’

services very useful, along with departmental definitions of high priority and low priority services/programmes as these are where future savings are to be found.

3.24 The next section of the Priorities and Budget document sets out ‘Government’s Priorities for Northern Ireland’ as:

- Health
- Education
- Economic competitiveness
- Investment in skills
- Infrastructure investment
- Energy infrastructure
- Children’s and young people’s services
- Review of Public Administration

3.25 Confusingly, these do not match the earlier list of priorities, nor indeed do they match the later key themes and priority outcomes. None of these priorities is numbered as a sub-paragraph and all are in bold, so we are assuming that all are full priorities, even though some are in italics. This in itself adds to the confusion.

3.26 Under health we note that the government will be formally responding soon to Professor John Appleby’s report. While we endorse the view that administrative structures need to be fit for purpose, we would urge government to reject Professor Appleby’s recommendation of a return to the purchaser-provider split within the health service. The ethos underlying effective public services is one of co-operation not competition and such a move would be disastrous in our view. NICVA welcomes the intention to take action on the issue of falling schools rolls. While there is a need to preserve schools in rural areas where providing a high standard of education to all ages is feasible, over provision to the tune of 50,000 places cannot be ignored. NICVA’s Policy Manifesto argued some time ago that this should be viewed as an opportunity:

“The decreasing child population in Northern Ireland should be treated as an opportunity to reduce class sizes and transform nursery schools into children’s centres located in communities where children and parents can learn together, as is happening in England.”

3.27 The infrastructure investment priority makes mention of the Investment Strategy currently being finalised. We would reiterate what we said in our submission to the consultation on the Investment Strategy that there is a danger of differential patterns of development in the east and west of Northern Ireland, exacerbating existing clustering of transport hubs, government jobs and general investment in the east. We do welcome, however, the clear link made here between the Investment Strategy, the Economic Vision and the social needs agenda. This link is something for which NICVA has long been calling.

- 3.28 NICVA welcomes the priority on energy infrastructure, particularly that Northern Ireland should seek to take a lead in developing renewable energy technology.
- 3.29 As mentioned above, the priority of children's and young people's services is welcome, given the disastrous situation in which many children's and young people's services were left after last year's budget. We hope that the appointment of a Children's Minister, alongside the high level ministerial sub-committee and the existing Children's Commissioner will effect real change in the lives of children and young people in Northern Ireland. Although the money will be ring-fenced, we are unsure how much it will be accessible to voluntary and community organisations.
- 3.30 In view of this as a new government priority, NICVA would welcome a real step change in the way we view services for children, especially very young children. As mentioned above, other parts of Europe provide a model (albeit one that cannot necessarily be neatly replicated) of how early years services can transform the lives of citizens. In Scandinavian countries childcare is a university level subject and childcare workers are very highly trained and earn high salaries in what is a high status job. Compare this with the often poorly paid and very young childcare workers in Northern Ireland. If early years development really is to be a government priority then we would like to see government engage in some serious debate around the nature and scope of services, including availing of the expertise of the voluntary organisations which are expert in this field.
- 3.31 In the final section of this chapter NICVA welcomes the commitment to the voluntary and community sector: "Developing a strong and appropriate role for the Voluntary and Community Sector is also particularly significant in Northern Ireland where the sector has and will continue to have a key role to play in assisting government in delivering public services and support, often to the most disadvantaged and marginalised in society." While we are pleased to see the sector's role in public services so strongly accepted, we would remind government that this is not the sector's only role. The Taskforce on Resourcing the Voluntary and Community Sector recognised that the sector has a wider role in advocacy, active citizenship and developing health and functioning communities. Not all of this is neatly allied to service delivery.
- 3.32 Overall this chapter of the document is weak compared with last year's analysis of the strategic context and the evidence of need in priority areas.

4.0 Resources

- 4.1 In addition to the general comments made about the budget above NICVA welcomes the announcement of three new Priority Funding Packages:
- Children and young people
 - Skills and science

- Environment and energy

- 4.2 As these appear to be planned to finance mainstream government programmes, it is not clear how much the voluntary and community sector will be able to access this additional money in the way that the Children’s Fund could be accessed. We would welcome substantial access, particularly to the children and young people fund, for voluntary and community organisations which are providing many of the vital services outlined in the document.
- 4.3 The skills and science fund seems to be bringing together rather divergent areas such as youth unemployment and technology transfer. It is unclear why the creative industries in particular are singled out for the encouragement of innovative approaches. This not only sits awkwardly with the other objectives but begs the question why innovation in other sectors is not being specifically encouraged with funding.
- 4.4 The list of objectives for the environment and energy fund are laudable: “enhancing the security, diversity and sustainability of energy supply, reducing the consumption of energy so as to improve business competitiveness, alleviate fuel poverty and minimise the impact on the environment.” Other items on the list include increasing the proportion of energy consumed from renewable sources, reducing the level of emissions from energy provision and consumption, protecting biodiversity, enhancing skills and creating jobs. All this seems rather ambitious for a fund of £15m with £35 capital and it will be careful not to spread the funding too thinly and achieve little.
- 4.5 We note that priority outcomes for three funding packages are to be included in the final document, presumably as they have not been worked out in time for the consultation. This effectively means that they will not be consulted upon.
- 4.6 The increased allocation of £48.5m for health is very welcome, as is the additional £20m in education for provision for children with special education needs.
- 4.7 On the issue of water charges, NICVA has welcomed the Minister’s decision to postpone charges for a year to allow for a fairer system to be devised. In a letter to the Minister we stated:

“As the umbrella body for the voluntary and community sector, NICVA’s main concern is for a fair, progressive system that protects those who cannot afford to pay. We recognise that the infrastructure which underpins the water system in Northern Ireland is in a dangerous state and in need of a complete overhaul. To do this of course needs capital investment to bring the water system in Northern Ireland in line with EU Directives and to promote and protect public health, particularly for the most disadvantaged.”

“We have in the past voiced concern that a basic public necessity would become subject to full cost recovery, in other words that water supply, like other utilities, will evolve from the supply of a service to citizens at subsidised rates, towards the sale of a commodity to consumers. This appears to us to be what is happening under the current set of proposals.

“NICVA believes that if a system of water charging is to be introduced it should be viewed against the following criteria:

- *Be efficient in economic terms.*
- *Sustain the environment.*
- *Produce socially just outcomes.*

“The proposals announced so far do not meet these criteria in our view. From the discussions we have had with others and the responses we saw to the Integrated Impact Assessment consultation, we would judge that many people and organisations are equally unhappy. We therefore commend your decision to take the time now to produce a proper policy on metering, judged overwhelmingly in a previous consultation to be the fairest system, and to design effective measures to protect those who cannot afford to pay an extra charge. Given the ongoing work on an anti-poverty strategy for Northern Ireland, the timing is fortuitous.

“The existing 25% discount proposed is inadequate and the charges will place an unacceptable burden on low-income families. NICVA has already advocated that every household should receive an allowance of water to be consumed at no charge. This would ensure that sufficient water is available to meet the basic needs for consumption and hygiene and recognise that clean water and sewerage are public goods. There is also widespread concern that property value is a very poor proxy for ability to pay and we look forward to the department devising a more effective system than the one proposed thus far.”

- 4.8 NICVA has previously stated its opposition to the GOCO for water services as it opens the door to privatisation of the service, since government could end up as a minority shareholder. The document states that, due to the delay in water charges, the GOCO will need to receive a subsidy from government. No figure is mentioned and this sum should be included in the final version of the document.
- 4.9 On the proposed rates increase, we note the relief scheme available to those on benefits but are worried about the additional burden on low income families who do not qualify for such schemes. While the additional payment of £200 to the over 65s is a welcome help with rates bills, a decent level of state pension would be a more sustainable option.
- 4.10 As mentioned above, the reprioritisation of resources to allow for 3% next year and 4% the year after to be transferred to high priority areas of work should be a transparent process. The only departments giving any indication in this document

of low priority programmes/services are DOE in its PSA mentioning that grants to councils will be reduced and DSD stating that expenditure affecting NI Housing Executive and aspects of urban regeneration will be 'reprioritised.'

5.0 Priority Outcomes and Key Themes Section

- 5.1 NICVA has called in past Programmes for Government/Priorities and Budget consultation processes for fewer, easy to understand, high level targets which are not about processes ("we will publish a strategy", "we will devise an action plan") but are outcome focused, ie spell out what changes will happen and by when. We note in paragraph 92 of the document that government "puts great store on the delivery of outcomes." Targets should reflect this. The more targets become chopped up, the more likely they are to be conflicting and end up producing a less than optimal overall outcome for the citizen. We witnessed some movement towards this last year with the formulation of 'priority outcomes'. However, this year's document has become more confusing, as mentioned above, with the priority outcomes and key themes not being obviously derived from either of the lists of priorities.
- 5.2 As noted above we welcome this attempt to set out high level priorities which then flow through into outcomes and targets. A clearer structure is beginning to emerge through key themes to priority outcomes and associated PSA targets. It would help if this approach could continue through to the rest of the PSAs to show to what priorities they are linked. Overall this year there are 97 targets (with 36 sub-targets) for the eleven departments. Last year there were 85 and we appear to be losing the previous attempt at simplification (in the two previous years there were 129 and 186 targets).
- 5.3 The key themes attempt to be cross-cutting in that most contain targets shared by more than one department. However, one key theme involves only one department (DHSSPS unsurprisingly in Health) and none involves more than four departments. In the theme of building equality and community cohesion the only departments whose PSA targets are involved in the three priority outcomes are DSD and OFMDFM. Outcomes such as reduced poverty, regenerated neighbourhoods and inclusion and good relations will need to involve the work of every single department. In the interests of seeing what government actually intends to do in a cross-cutting fashion to bring about these outcomes, it would be better to see key PSA targets from all departments in this section.
- 5.4 Previous key themes have stated better what NICVA would like to see in such a document, in articulating issues of sectarianism, division, disadvantage, equality, rights and victims. Replacing this with 'building equality and community cohesion' diminishes its impact and omits crucial cross-cutting issues which need to run through such a high level set of policies and actions.

5.5 We note the key themes as:

- health and personal social services
- investment in education and skills
- building equality and social cohesion
- infrastructure development
- efficiency and reform programme

5.6 We also note that these are not the same key themes as last year but that the priority outcomes contained within them are the same, rearranged under the new themes. Many of the targets remain exactly the same as last year, which is not surprising given that last year's targets were also to run to 2008. However, where some of the targets could have been updated with more recent information from the intervening year or, indeed, made more challenging based on progress achieved, this does not seem to have happened. Examples will be highlighted below.

5.7 Health and personal social services

5.7.1 Under the theme of Health and Personal Social Services and the priority outcome 'Provision of more effective and efficient health and personal social services' we note the addition of a welcome target on suicide reduction and one on smoking reduction. Otherwise, with the addition of outpatient treatment to the waiting times target and the dropping of the over 75 element of the community services target, the targets appear exactly the same as last year's document.

5.8 Investment in education and skills

5.8.1 We note that under the three priority outcomes in this theme 'High quality education system', 'A better qualified and skilled workforce' and 'Competitive business' targets relating to four departments are involved. We welcome the fact that the education targets are specific, but they contain misprints and we would question how ambitious some of them are at this stage.

5.8.2 The figures given in the first target in 'High quality education system' on key stage 2 in English and Maths quotes comparative figures from 2002-03, making the target word for word the same as that in last year's document. Why have figures not been given from 2003-04, as happens elsewhere in targets from the same department? This would help in making a judgement on how fast things are progressing year on year and whether targets need to be revised to make them more ambitious.

5.8.3 The second target — on pupils obtaining five or more GCSEs — gives a comparative figure of 60% in 2002-03 when this is actually the figure for 2003-04 (the 2002-03 figure was previously given as 59%).

- 5.8.4 Likewise in the third target — on A levels — the comparative figure given as 2002-03 (58%) is actually the 2003-04 figure. The 2002-03 figure was 56%, meaning that in one year there has been an increase of 2% to 58%. At this rate (which admittedly might not continue) the 60% target will be achieved three years early. Yet it has not been revised in this year's document.
- 5.8.5 We note that the targets on reducing differentials in educational attainment are both specific and measurable and are also exactly the same as in last year's document.
- 5.8.6 The new target in this priority outcome area on implementing a strategy for the education estate is very much a process target and does not spell out what outcomes would be achieved.
- 5.8.7 The targets from DEL and DETI in the priority outcome area 'A better qualified and skilled workforce' are exactly the same as last year's. Two of the targets only go as far as 2007 and do not cover the full period of the plan to 2008. The DETI target on increasing the percentage of the working age population who are economically active is vague in that it does not specify what the target increase will be.
- 5.8.8 This is the same for the first DETI target under the outcome 'Competitive business.' This target is the same as in the last document and states: "*By March 2008 reduce the productivity gap (measured by GVA per hour worked) with the UK.*" This does not indicate what the reduction should be.
- 5.8.9 Likewise the new target on closing the gap on R&D expenditure gives no indication of when the gap should be closed and what the benchmarks are.

5.9 Building equality and community cohesion

- 5.9.1 We note that the majority of targets in this section are exactly the same as last year, with the exception for the housing-related targets.
- 5.9.2 Most of the targets in this key theme are very vague. For example, the first target "By 2008 to contribute to combating poverty by supporting people to move from welfare to work, and by increasing benefit uptake through targeting all customer groups" is not so much a target as a statement of intent. How many people will be helped? By how much will benefit uptake be increased? On poverty and disadvantage we would stress again the need for a proper anti-poverty strategy and the need to join up the various strategies currently in place. There are still too many scattered initiatives in the absence of the strategic framework. It is important both to join up delivery and to attempt to learn from the outcomes in a joined-up way. On a high level NICVA would like to see concrete targets setting out how many people will be lifted out of poverty and by when.

- 5.9.3 The second target: “Reduce the number of households and children living in poverty and improve the prospects, opportunities and living conditions of those in the most disadvantaged areas and groups by co-ordinated policy and action” begs the questions how many and by when?
- 5.9.4 The third target: “By 2010 ... close the gap between the quality of life for people and marginalised groups in the most deprived neighbourhoods and the quality of life in the rest of Northern Ireland ...” needs to say by how much will the gap be closed? What is the gap we are talking about? Implementing the Neighbourhood Renewal Strategy, which is mentioned as part of this, is a process target. What will communities look like after it has been implemented?
- 5.9.5 The housing targets are much more focused in setting out numbers of households to be improved and housing fitness levels. We note that some of the numbers have been lowered from last year, for example the number of households to access low cost housing each year was 12,000 while the target for 2006-07 is now 11,400 and there is no target for the next year. Also last year the target for improved energy efficiency was 15,000 homes per year. This has now fallen to 14,000. We welcome, however, the specific target of eradicating fuel poverty in vulnerable households and in all social housing by 2010.
- 5.9.6 The targets under the priority outcome ‘Equality, inclusion and good relations’ in this theme are exactly the same as last year and remain very vague. ‘Improving legislation’ is not a target, it is an intention; how will the Equality Commission be supported and to what end? What will the ‘co-ordinated strategic action to promote equality and social inclusion’ result in and by when? How will these things be measured? (We appreciate that technical notes are to be available to provide information on measurement, but at the time of writing these were not available.) While we welcome the target to build good relations, it is not sufficiently concrete. What outcomes can we expect? This OFMDFM target on building good relations retains last year’s wording, despite the fact that it has actually been changed in this year’s OFMDFM PSA.

5.10 Infrastructure development

- 5.10.1 We note that targets relating to three departments are included on this theme. The new OFMDFM target on infrastructure investment is again very process-focused. What will the outcome be?
- 5.10.2 The DRD target on compliance with Waste Water Treatment standards is 84% compliance by 2006. Last year’s target was 80% compliance by 2005. Is it possible to set a target for 2008 so that it can run to the end of the period covered by this document?

- 5.10.3 The transportation target for Translink is exactly the same as last year and the year before. It would be useful to know whether passenger numbers have continued to fall or have increased in the interim. Will public transport be extended to achieve this target? What are the key transport needs identified on which this target is based?
- 5.10.4 We welcome the target for reduction in road injuries which is shared by DRD, DOE and PSNI. However, it would be useful to know exactly what is being reduced by 33/50 per cent. Two years ago the targets specified that the targeted reduction was on the 1996-2000 Northern Ireland average. Are these still the figures being used?

5.11 Efficiency and reform programme

- 5.11.1 The first target under this key theme is a DFP target from last year's document. It does not appear in this year's DFP PSA. It has not even been altered to take account of the fact that there is only a two-year period to March 2008 in the timeframe of this document. Likewise the next target does not appear to come from any of this year's departmental PSAs. The impression that last year's targets have just been copied over and arranged in a different order under new key themes does not give the impression that a great deal of strategic thought went into framing these supposedly key target and outcome areas.

6.0 Comments on Individual Departmental PSAs

- 6.1 Departmental objectives in the individual PSAs are not explicitly linked to the 'key priorities' other than when departmental targets appear alongside priority outcomes early in the document. This means that because departmental remits are so broad the PSAs inevitably revert to the kind of chopped-up government that does not always easily read back to the overall joined-up priorities/themes. If commitments in the PSAs were to be linked to the overall key themes, it would help to produce a more coherent picture. Clearly, departmental budgets are separate and departments plan their own actions, but there is little point in setting cross-cutting themes if individual departmental actions are not then explicitly linked to them. The public are interested in joined up outcomes, to deal holistically with their lives. How each department will contribute to those could be set out with clearer linkages.
- 6.2 We note that a number of shared targets appear at the end of each PSA, some of which appear to be a standard wording for all departments. While we welcome the sharing of targets, if these are genuinely shared why do they not appear in their own right within each departmental PSA? Presumably they also have budgetary implications and citizen outcomes like other targets.
- 6.3 We also note and welcome the fact that most introductory sections to the PSAs this year contain a commitment to sustainable development. Two notable

exceptions to this are the Department of Agriculture and Rural Development, which surely has a key role to play in the implementation of the forthcoming sustainable development strategy, and the Department of Finance and Personnel, whose role in procurement is also central to sustainability.

6.4 Agriculture and Rural Development

6.4.1 We note that part of the department's objective is to "stimulate the economic and social revitalisation of disadvantaged rural areas." Unfortunately, none of the targets seems to relate directly to this. The objective is also worded differently in the introductory section to the PSA and in the PSA table itself.

6.4.2 NICVA's Policy Manifesto calls for the following:

"Task the Department of Agriculture and Rural Development with taking the lead on the development of a White Paper which creates robust working linkages across all government departments. This should be in the public arena within one year.

Ensure that the White Paper recognises and endorses the established rural community infrastructure (Rural Community Network and Rural Support Networks) and that it is properly resourced at all levels, from government departments through to District Councils.

Encourage the widest public debate and the involvement of the voluntary and community sector as a whole in consultation on the White Paper to ensure that models of best practice and experience can inform rural development."

6.4.3 We note that there are no new targets in this PSA but that figures have been revised to reflect this year's position.

6.4.4 The Department notes that the budget proposals have made it necessary to reduce the resources going to the agricultural sector. We are concerned that this should not have a negative impact on rural communities and should not be passed on as cuts to voluntary and community groups working in rural areas.

6.4.5 As mentioned above, it is disappointing that this section contains no mention of DARD's contribution to sustainable development.

6.5 Culture, Arts and Leisure

6.5.1 NICVA's Policy Manifesto recommends:

"The process begun by Unlocking Creativity has focused largely upon economic outputs and should be rolled out more fully to address arts and creativity within

education, health and social contexts. A working group should be established to engage with the voluntary and community arts sector in this process.

There should be increased resources for DCAL (Department of Culture, Arts and Leisure) and increased efficiency within the department should be considered through a restructuring process, which must include a mechanism for consulting with the voluntary and community sector.

DCAL should implement the commitment given in Partners for Change in 2001 to host an annual forum of voluntary and community sector groups.

DCAL and other arts researchers in the statutory sector should establish a mechanism to share information with other researchers in the area of arts and creativity to maximise research potential.

One person within every department should be given lead responsibility for liaison on matters relating to arts and creative activity. This approach should also apply to other non-departmental public bodies and agencies, particularly the Office of the Commissioner for Children.

There should be a ring-fenced budget within each department to engage creatively with communities and to support the use of arts and creative activity in pursuit of its objectives.

Voluntary and community arts need a strong infrastructure which requires that their resource agencies receive adequate and secure long-term funding in order to provide connectivity, training and development.”

- 6.5.2 The department notes that this year it has been necessary to “aggressively review spending priorities.” The department also notes that it will attempt to “maximise the sporting, social and economic opportunities of London 2012.” In view of tight budgets, which will inevitably mean cuts to voluntary and community sector arts organisations, it is an added injury that huge amounts of Lottery funding are being diverted to support the London 2012 Olympics. We will be very interested to see exactly what the benefits for Northern Ireland on the social and economic front will be and look forward to the department spelling these out in the near future in the strategic plan announced by the Minister, David Hanson.
- 6.5.3 We welcome the additional resources planned for book stocks in libraries but are concerned at the plans for ‘rationalisation and modernisation.’ Libraries should be a central resource within neighbourhoods and with lack of promotion, static book stocks and resources that reflect the previous century rather than the current one it is unsurprising that, despite the attempts of individual libraries to work hard at drawing people of all ages into the building, some are seriously under-used. Modernisation is clearly the answer to this – making libraries twenty-first century resource hubs that people of all ages can use. Rationalisation based on an

unmodernised service is putting the cart before the horse. Many of those who do still use libraries regularly are older people and to remove a local resource from them is unacceptable. We recognise that budgets are tight but, in view of the central role libraries could play within new clusters of services following the Review of Public Administration, we fear that local libraries will be closed prematurely and will not be seen again.

6.5.4 We welcome the fact that the budget for arts will underpin arts infrastructure and would reinforce our concerns above that reducing budgets should not be cuts from the weakest parts ie voluntary and community organisations.

6.5.5 We welcome the new emphasis in the department's PSA section on sustainable development and the contribution DCAL can make.

6.6 Education

6.6.1 We welcome the department's objectives, particularly the intention to give young people "a secure foundation for lifelong learning and employment; and develop the values and attitudes appropriate to citizenship in an inclusive society." We also, as mentioned previously, welcome the abolition of the Transfer test and look forward to the outworking of the Costello recommendations. We need a fairer system of education which gives a quality start in life to all our young people, not just those who have advantages to start with. We welcome the Minister's commitment to decisions already made, which we believe are the right decisions and anticipate a fairer system which does not further damage the life chances of disadvantaged young people.

6.6.2 NICVA's Policy Manifesto, which assumes that education should be a lifelong endeavour, recommends:

There should be a specific focus on the early childhood years 0-6 and support for a distinct preschool experience for ages 3-6, with a curriculum based on play and creativity.

The decreasing child population in Northern Ireland should be treated as an opportunity to reduce class sizes and transform nursery schools into children's centres located in communities where children and parents can learn together, as is happening in England.

The enriched curriculum should be expanded into all pre-school and key stage 1 provision across Northern Ireland, with a proper pastoral care role for teachers and appropriate teacher training.

Pre-school children with special education needs in the voluntary and independent sectors should receive the same financial and personal support as is available to those with similar needs in statutory nursery places. All school

buildings and the curriculum should support inclusion and be accessible to children and young people with disabilities.

“Within three years there should be a fully functioning credit accumulation and transfer system which all providers would be required to adopt.

A common approach must be adopted to standards and funding between statutory and voluntary and community sector providers and there must be greater equity of funding in building collaborative arrangements between providers in the different sectors.

There needs to be sustained support for neighbourhood-based community learning and the infrastructure that exists to provide local access to education.

There must be a commitment to widening access to post-secondary education to include a fair and realistic maintenance system to support and resource the most disadvantaged.”

- 6.6.3 NICVA welcomes the cross-departmental working that the new funding package for children and young people will bring. This kind of joined-up approach is something that voluntary and community organisations have long been calling for. Since OFMDFM and DSD are to be involved, we look forward to clear links with Neighbourhood Renewal and with the anticipated Anti-Poverty Strategy.
- 6.6.4 We welcome the emphasis on sustainable development within this section. The department will have a vital role to play in this as educating the whole population is key to the success of a sustainable development strategy. We will need to alter our lifestyles and educating the population to understand why and how needs to begin in schools.
- 6.6.5 We will not repeat the comments made on some of the department’s targets in the section on priority outcomes above.
- 6.6.6 Given the acknowledgement last year that the 36 per cent target for participation in the Youth Service by 2007 had already been surpassed, the target of 42 per cent participation by 2008 set last year and unchanged this year does not seem very ambitious.

6.7 Employment and Learning

- 6.7.1 NICVA welcomes the new resources for innovative policies focused on enhancing life chances and the joined-up, inter-departmental working they will bring. We note that the department will be working with DSD and DETI.
- 6.7.2 We have commented above on our disappointment that vocational learning seems to be becoming a pathway for disadvantaged young people. On the intention to

- help underachievers at school move into Modern Apprenticeships, our reaction would be similar — this should depend on why people are underachieving. If it is because the system is failing, then the target is obvious – fix the system. We appreciate that DEL is often dealing after the fact with the results of a failed education system and that something must be done to help those individuals who have left school with very little. However, within a planning framework the aim should be long-term radical change rather than short-term sticking plasters.
- 6.7.3 Again we welcome the additional investment in FE and HE to provide better facilities for students with learning difficulties and disabilities under the SEND Order.
- 6.7.4 We also welcome the department’s emphasis on its contribution to sustainable development with its internal green policy. In light of our comments on DE above, and the role of education in informing the wider community about sustainable development and the changes it will necessitate, we would also like to see DEL have an external focus on delivering the message through other learning outlets.
- 6.7.5 We note that this year’s targets are the same as those in last year’s document. As we pointed out then, the higher education target “By 2008, make progress year on year, towards fair access to higher education” is rather vague. What is fair access? How many people can expect to experience it? Also, three of the targets only run to 2007 and not to 2008. What are the target figures for the second year of this plan?
- 6.7.6 Given that one of the DEL targets is to modernise its service and support people moving from Welfare to Work, a joint target with the Social Security Agency within DSD would seem to be appropriate.
- 6.7.7 We note the recent comments of the Public Accounts Committee in relation to the Jobskills Programme. The new emphasis on skills development provides an opportunity to make sure efforts are being focused into programmes which are relevant and effective with an emphasis on outcomes, not through-put.
- 6.8 Enterprise, Trade and Investment**
- 6.8.1 We welcome the cross-departmental work planned by DETI, particularly around the new skills and science fund.
- 6.8.2 NICVA also welcomes the emphasis placed on sustainable development, particularly the emphasis on renewable energy technology development.
- 6.8.3 We note that the department will seek to encourage more new business starts and would recommend that the department addresses the issue of under representation

of women in new business start. We believe that increased efforts to encourage female entrepreneurship could bring benefits to the economy. [insert EDF info]

- 6.8.4 Given the highlighting of stable, renewable energy sources in the opening sections, we welcome the new target on sustainable energy, however, it is vague and process-orientated and needs to focus on outcomes.
- 6.8.5 As we commented last year, many of the other targets are equally vague. For example “During the period 2005-08, increase the percentage of the NI working age population who are economically inactive and increase the NI employment rate.” By how much? “By March 2008 reduce the productivity gap with the UK.” Again, by how much?
- 6.8.6 We welcome the more concrete new target on R&D for Invest NI and a sharper version of the inward investment target which now specifies a number of companies. The new broadband target is also more focused.
- 6.8.7 We note, however, that the number of new businesses to be established by 2008 has fallen from last year’s target of 10,000 to 7,000 and that the target relating to the electricity market has changed from ‘open electricity market to all consumers’ to ‘ensure delivery of a proposal to reduce costs’. This seems like a less ambitious target and has become focused on a process rather than an outcome.
- 6.8.8 The tourism target “By March 2008, increase annual visitor spend to £518m” would benefit from comparative figures so that it can be judged how ambitious the target is. What is the current figure? Previously the target increase was 6% year on year, is this new target aiming at a greater or a lesser impact than that?

6.9 Finance and Personnel

- 6.9.1 We note that the department’s objectives have changed slightly to reflect a new emphasis on reform and modernisation. As mentioned above, we are disappointed that the new emphasis does not include a stated commitment to sustainable development as DFP’s role in procurement places it at the heart of an attempt to change government practices into a more sustainable pattern.
- 6.9.2 The departmental targets are all very process-focused and are vague in terms of outcomes.

6.10 Health, Social Services and Public Safety

- 6.10.1 As we have stated in previous years, NICVA believes that health promotion should play a major part in improving the health of the region and should be resourced accordingly. We know that acute services will always consume all the resources allocated to them and that encouraging and enabling people to make the switch to healthier lifestyles is the only sustainable approach. It is also an

approach that will address the major health inequalities in Northern Ireland. We would like to see resources allocated to health promotion which will enable this switch to begin, but are unable to tell from the way in which the budget is laid out in the document exactly what the health promotion resources are. .

6.10.2 On health, NICVA's Policy Manifesto recommends:

“Service provision

There should be diversification of funding to recognise the input the sector has in tackling need directly.

Services which are delivered by the voluntary and community sector should be mainstreamed to avoid exposure to uncertainties of traditional funding cycles.

There should be recognition at all levels that the sector's core work is a major factor in addressing the needs of the poorest and socially excluded members of society through its delivery of preventative care and generally improving the health — physical and psychological — and quality of life of such individuals.

Government should increase funds to promote walking and cycling, for example, Safe Routes to School and more cycle lanes.

Government should commission an independent research study to ascertain the number of adults and children who have been sexually abused and who may require counselling in Northern Ireland, and promote and fund the provision of services for victims of abuse.

Developing the equality agenda

The voluntary and community sector should have a greater role in targeting resources to those in greatest social need.

A health development strategy to be delivered at community level should be developed. Departments, Boards and Trusts need to work with the voluntary and community sector in developing innovative solutions to implementing Investing for Health's strategic objective on addressing inequalities.

User and community involvement

Although the development of Local Health and Social Care Groups is to be welcomed, there is still limited connection between community development and user and community involvement within the Department of Health. Political parties should make a commitment to promoting user involvement and to enabling a much greater range of opportunities for user participation in the development of services at a local level.

The role of the voluntary and community sector in developing self-management programmes for people with long-term medical conditions needs to be recognised and those organisations involved as full partners in any new expert patient programme.”

- 6.10.3 NICVA welcomes the department’s statement that “Priority would be given to reducing the number of suicides, reducing the numbers of people who smoke, and to initiatives which treat more patients within primary care and enable more people to live independently at home or in the community.”
- 6.10.4 We are disappointed that DHSSPS does not mention sustainable development in this section of the document, since as a major employer it will have a very important role to play in implementation of the forthcoming strategy.
- 6.10.5 We welcome the fact that the target on smoking reduction has been made more ambitious since last year, with targets now at 22% of the adult population by 2011 and manual groups at 27%.
- 6.10.6 We note that some of the targets, such as those for emergency call out times and renal dialysis, refer to 2007. What will be the targets for the final year of this plan?
- 6.10.7 We welcome the new targets on community care packages and suicide rates, and the addition of outpatient appointments to the target on waiting times.
- 6.10.8 It is unclear why the adoption target has been dropped. Is there now no target for adoption in Northern Ireland?

6.11 Environment

- 6.11.1 On the environment, NICVA’s Policy Manifesto recommends:

“Establish a statutory basis for sustainable development which requires government and its various departments and agencies to ensure sustainable development is at the core of all policy and decision making.

Adopt and implement an agreed set of sustainable development indicators and monitor their progress through regular published reports by all departments.

Establish an independent Environmental Protection Agency with the power to enforce environmental legislation.

Establish and fund a National Parks and Open Spaces Agency to champion and develop the economic, social and environmental benefits of parks and open spaces through greater community involvement.

Require all government properties to use power entirely from renewable sources and increase energy efficiency measures throughout the government estate. Also promote the use of renewable fuels for government vehicles.

Support the development of more sustainable buildings through financial incentives and incorporation of requirements for the use of renewable energy, high insulation standards, water conservation measures and sustainable building materials into building control regulations.

Further increase public involvement by giving the public equal rights to intervene in the planning process through the introduction of a third party right of appeal to help address widespread public dissatisfaction with the planning system and put in place a Planning Aid service in Northern Ireland.

Ensure implementation of and compliance with all international obligations that relate to fresh water and the marine environment.”

- 6.11.2 In addition to these Manifesto points we would reiterate the points we raised in response to ‘Reforming Planning’. NICVA would advocate the introduction of a requirement for the Planning Service to produce a Statement of Community Involvement. This would mirror changes in other parts of the UK and would provide a statutory basis for community consultation on major planning issues. We are also aware that environmental groups in Britain successfully campaigned for a statutory duty for planning to contribute to the principles of sustainable development. We feel that there should be a change in the law in Northern Ireland to state that the purpose of planning is to contribute to sustainable development. We therefore welcome the new draft planning legislation which includes statements of community involvement and a legal duty to promote sustainable development.
- 6.11.3 We do not accept recent arguments that there is no clear evidence in support of third party rights, that the systems used in the planning processes are "human rights compliant" and that the planning process overall is open and transparent. There is clearly not a "level playing field" with respect to communities and their ability to effectively engage in the planning process and certainly those communities are not on an equal footing with other parties. We believe that this should be addressed by reconsidering the introduction of third party right of appeal. We would also advocate that Public Inquiries should be a level playing field for all. Less legalistic informal hearings and discussions — Examinations in Public — should be introduced where possible to facilitate greater meaningful involvement and confidence in the process.
- 6.11.4 We welcome the department’s ‘greening government’ programme and look forward to its implementation across all departments.

6.11.5 We note that of the department's five targets two are the same, two are new and one is altered to reflect the imminent sustainable development strategy. Two targets refer to 2007 and do not stretch to the full length of this plan. We welcome the new target in illegal waste dumping.

6.12 Regional Development

6.12.1 On transport, NICVA's Policy Manifesto recommends:

Giving priority to investment in public transport across the region to redress the imbalance over the long term and reverse the current unsustainable position, which is economically, socially and environmentally detrimental. Government should give the lead as public sector employer and develop travel plans for its employees including provision of facilities for cyclists.

Reducing the ever-growing dependence on cars through greater than planned investment in sustainable and healthier alternatives such as Safe Routes to School, cycling and walking.

Introducing a monthly public transport travel ticket paid for by the employer and recovered from employee salaries before income tax is deducted.

Putting in place a new ambitious target which ensures that 80% of all households in Northern Ireland live within ten minutes of a public transport stop.

Putting in place a North/South policy on public transport investment.

Continuing and expanding the Rural Transport Fund and removing the barriers to a flexible and responsive 'door to door' service to people living in sparsely populated areas.

Extending the Bus Service Operators Grant (BSOG) to a range of community groups with Small Bus Permits in line with England, Scotland and Wales.

Extending the concessionary fares scheme to allow disabled people who cannot access existing public transport to use their concessionary fare for accessible community transport or taxis. This would also benefit those in rural areas who have very limited access to public transport.

6.12.2 NICVA welcomes the assertion that "sustainable development is at the core of the infrastructure driver and is evident in the infrastructure proposals." However, we are slightly worried that one of the elements of the strategy then highlighted is "Generate growth in the air destinations available from Northern Ireland." While this may be desirable from a business point of view, increased cheap air travel is disastrous in sustainable development terms. Infrastructure development must do more than pay lip service to sustainability when faced with hard decisions

affecting the economy. The least popular choice may sometimes be required as the sustainable one.

- 6.12.3 We will not restate our views on water reform, above, other than to say that we do not view a GOCO as the ‘sustainable’ option for delivery of a public service.
- 6.12.4 We notice that the department’s target on road resurfacing has fallen from 35% of that recommended in National Best Practice Guidelines to 10%. This seems like a substantial reduction, although we note that the target for motorway and trunk maintenance has remained the same.
- 6.12.5 As we commented last year, some of the targets are very vague, for example, “achieve more sustainable patterns of development as outlined in the Regional Development Strategy.” What will be achieved, by when? Obviously the whole of the RDS cannot be reprinted here, but what are the headline outcomes?

6.13 Social Development

- 6.13.1 NICVA notes that the department, in order to live within this year’s budget, indicates there is likely to be “some reprioritisation of expenditure affecting the NIHE and some aspects of urban regeneration.” While it is useful that the department has actually mentioned the areas in which reductions are likely to be targeted, as many other departments have not, we are concerned that a cut in urban regeneration funding could seriously affect the work of voluntary and community organisations. We look forward to further detail from the department on what this will involve.
- 6.13.2 We welcome the department’s stated goal of establishing a sustainable development programme in relation to housing. We would urge the department to consider the sustainable development impacts of all areas of its work, not just housing.
- 6.12.3 NICVA welcomes the fact that urban and community renewal remains a focus for the department, with the caveat about funding above. The department’s intention to improve the quality of life for individuals, vulnerable groups and neighbourhoods needs to be closely linked to the anti-poverty strategy when it is ready. The Neighbourhood Renewal programme, upon which many high expectations were pinned, is apparently having different levels of success as it rolls out in different areas. This programme needs to be responsive to local needs, while linking with a high-level anti-poverty strategy which can make the kinds of structural changes that can never be made at neighbourhood level.
- 6.12.4 We welcome the department’s commitment to continue to enhance the capacity of the voluntary and community sector. We look forward to the implementation of *Positive Steps*, which will bring about changes for the sector and will involve a lot of effort on the part of government and the sector. However, we are concerned at

the emphasis in the Priorities and Budget document on service delivery as the main role of the sector. Volunteering is recognised as contributing to strengthening communities and we would argue that all kinds of organisations contribute to strengthening communities in ways that are not necessarily linked to service delivery. Positive Steps also recognises the important and increasing role which voluntary and community organisations play in policy development. Even though government may not choose to fund this role, we would like it to be recognised. [insert more on Positive Steps]

6.12.5 We have commented on some of the department's targets in the section on priority outcomes above. Many of them are vague and not focused on outcomes. We note and welcome the new target on enabling 12,000 people each year to remain in their own homes.

6.12.6 Having participated in much of the preparatory work, NICVA welcomes the ongoing work on the review of Charity Law and the proposed Charity Commission for Northern Ireland. We look forward to the sector being closely involved in the drafting stages of the legislation.

6.14 OFMDFM

6.14.1 NICVA welcomes the first mention of human rights in this document which appears in the department's objectives.

6.14.2 We welcome the fact that the proposed budget will allow the department to continue to support work on the promotion of equality of opportunity, good relations, action to tackle poverty, and support for victims and children.

6.14.3 We look forward to the publication of the triennial action plan which will make *A Shared Future* a reality, and without which the targets published remain very vague. It is not conceivable that a policy as ambitious as *A Shared Future* can succeed without having budgetary implications, as has been claimed and NICVA would like to see a realistic budget made available for its implementation.

6.14.4 It is welcome that OFMDFM has set out its efforts in fulfilment of the Waste Management Strategy, however, the department does not mention the much wider implications of sustainable development for its work and its policies.

6.14.5 OFMDFM notes that it, together with DFP, is responsible for administering the Integrated Development Fund. This is the only remaining existing cross-cutting fund mentioned in this year's document. Although we accept that some projects may be at an early stage, the success of this initiative has to be questioned when one of the areas in which it is being piloted, Greater Shankill, has just had another new initiative announced – a special high level delivery team – to deal with some of the same issues that the Integrated Development Fund is supposed to be tackling.

6.14.6 We note that many of the department's targets are new this year. Many are very process orientated, for example, "publish a triennial action plan," "agree a timetable", "continuously improve public services", and "put in place co-ordinated strategic action." Targets need to demonstrate the outcomes of these actions. When will the action plans be put in place and to what end? Having said this, we welcome the emphasis on gender equality, equality and social inclusion.

7.0 Equality, Good Relations and New TSN

We welcome the commitment to publish strategic priorities aimed at reducing the gap between the 'haves' and 'have nots' because one of NICVA's core aims is the creation of a more equal society free from poverty and sectarianism. As well as support for specific disadvantaged groups, we argue for a focus on social inclusion because unequal societies have higher levels of poverty than more equal ones.

We note that officials have been working closely with the Equality Commission to build on the methodology for assessing the equality, new TSN and good relations of the government's proposals, in order to comply to the fullest extent possible with the equality impact assessment (EQIA) processes as laid out in Commission Guidance.

However we are disappointed that the advice has not encouraged the department to carry out a full EQIA. The department may have written down the various steps but they have not provided the evidence for their decisions. For example, assessment of impacts and consideration of mitigation stages have been amalgamated to announce the reallocation of funding to the priority areas of children and young people, skills and science, environment and energy. We would like to see the evidence and impacts which underlie these new priorities.

As in other high level EQIAs the document states that mainstreaming of equality of opportunity, nTSN and good relations has taken place and reference is made to high level impact assessments carried out by individual departments. However this information is not provided. Despite this, it is stated that the priorities will have positive equality impacts for a range of equality categories. This may be true but we would argue that good intentions are not the same as evidence-based proposals.

Again, the good intention is stated that 'where adverse impacts have been identified, Departments will seek to mitigate these by working to ensure that proposed options for reduction are in lower priority areas and by taking advantage of new opportunities to lever in additional resources from government's proposed priority funding packages.' There is no information about what constitutes lower priority areas and the Department seems to assume that equality legislation and strategies including Anti-Poverty, Race Equality and Shared Future will smooth out any adverse impacts.

NICVA would further argue that the additional resources for children and young people, while being welcome, have no specified outcomes and therefore it is impossible to comment on any potential adverse impacts. Furthermore it may be thought to go some

way to replace the axed Children's Fund but that fund was open to bids from the voluntary and community sector and there is no information about the sector's role in this year's announcement of £25m each year for two years.

We also are concerned that the integrated impact assessment did not refer to human rights. The government's EU obligations under NAPS/inclusion, under the UN International Covenant on Economic, Social and Cultural Rights and the Human Rights Act must be taken much more seriously in order to plan for better public services.

NICVA would commend the positive experiences of other jurisdictions which have taken part in successful participatory budgeting. The decisions not only have impact on investments but the process has broadened the scope of voices included in policy-making and expanded citizenship to previously excluded groups.

We welcome the expression of interest in feedback from social partners but we would request an opportunity to comment on the allocation details before the budget is finalised.

8.0 Conclusion

- 8.1 We note the extremely short timetable between the end of the consultation period on 5 December 2005 and redrafting of the Priorities and finalising the Budget one week later. Since there may well be a large number of detailed responses and it is important that those who have taken the time to respond to such a complex document can be assured that their comments have been heard, we would recommend continuation of last year's practice of summarising the main points raised in the consultation and an indication of where alterations are being made to the final document to reflect where comments (if any) have been taken on board.

December 2005