

Dr Alan Scott
Department for Employment and Learning
Room 203
Adelaide House
39-49 Adelaide Street
Belfast
BT2 8FD

31 May 2005

Dear Dr Scott

Thank you for inviting the Northern Ireland Council for Voluntary Action (NICVA) to comment on *Work and Families: Choice and Flexibility*, issued by the Department for Trade and Industry.

NICVA is not opposed to any of the detailed proposals in the consultation document. However, we are unable to form a firm judgment on them in the absence of data about the possible impact on Northern Ireland. Even if the proposals are desirable, it could well be that other policies would better serve the interests of children and parents locally.

Essentially we are being asked to comment in a vacuum because DEL has not supplemented the DTI consultation report with any figures on Northern Ireland. This conflicts with the government's stated commitment to evidence-based policy making. In addition, the regulatory impact assessment applies to Britain only and we are told that DEL will carry out an assessment at a later date. This may mean that the Northern Ireland perspective will not influence the UK debate as it should. We note that many of the proposed changes relate to benefits, which are effectively common throughout the UK. If decisions are taken in London soon on the basis of a British consultation, it will be too late by the time Northern Ireland consults on a local regulatory impact assessment – a process that can hardly be completed until the autumn.

There are many of examples of how DEL could have improved the local input into the consultation by providing information about Northern Ireland. For example:

- Paragraph 1.6 says the proportion of lone parents in work has risen from 44% to 54% in the last decade. Paragraph 3.37 uses the figure of an increase of 277,000 since 1997. What are the NI figures?
- Paragraph 1.7 quotes the change in the proportion of mothers with children under the age of six in work but there are no NI figures.
- Paragraph 1.15 refers to the number of carers of working age and how many are in work; again there are no NI figures.
- Paragraph 1.26 quotes a lot of statistics eg 6,00,000 people are benefiting from the Working Tax Credit and the Child Tax Credit and there are 524 Sure Start

programmes helping 400,000 children. In no cases has DEL provided specific NI data to help people respond meaningfully.

In some cases it is not clear if NI has been included in research carried out in Britain; if so, no separate findings are reported. If not, we would ask why similar research was not carried out locally. For example:

A survey of employers on the subject of family friendly working practices is mentioned in paragraphs 1.23 and 2.31.

A survey of parents referred to in paragraph 2.4 shows that 75% of mothers on maternity leave returned to work early for financial reasons.

NICVA believes this is an unsatisfactory way to carry out a consultation. If responses are to mean anything they must be well informed. Possibly NI respondents could do their own research and find out all the above information but it makes no sense for them to waste their energies doing so, especially since the volume of consultations makes it difficult to allocate them much time.

We are not opposed to UK policy proposals being used as the basis for consultation in Northern Ireland. However, we believe the onus falls on NI government departments to do appropriate research on the specific local implications. In this case a short paper from DEL setting out the key statistics would have usefully supplemented the national consultation report.

Our view is that this should be noted for all future consultations so that decisions can be taken on the basis of relevant local evidence.

We look forward to hearing from you.

Yours sincerely

Paul Mc Gill