

## **Carrickfergus Borough Council**

### **Question 1: What are your views on the Socio-Economic Analysis relating to the draft ERDF Competitiveness Programme?**

While we broadly agree with the socio-economic analysis, we believe that more reference should be made to social objectives at a Northern Ireland level, especially in light of the "creating sustainable communities" cross-cutting theme.

### **Question 2: What are your views on the Labour Market Analysis relating to the draft ESF Employment Programme?**

We broadly agree with the Labour Market analysis, and feel that the ESF Employment Programme must fully compliment the ERDF Competitiveness programme. We also feel that the ESF Employment programme must promote additional activities in the achievement of the objectives, and not be used to mainstream any existing activities.

### **Question 3: What are your views on the proposed strategy, priority, key areas of expenditure and allocations for the ERDF Competitiveness Programme?**

The alignment of the proposed programme with the Lisbon Agenda is welcomed by Carrickfergus Borough Council, and we agree that innovation and entrepreneurship are essential in the development of a strong private sector. We agree that priority needs to be given to closing the productivity gap between Northern Ireland and the rest of the UK and Republic of Ireland. To that end, we suggest that the Belfast Metropolitan Area, as the key economic driver of the region be given priority. This is the most effective and efficient way of meeting the requirements for delivering the Lisbon agenda within the Northern Ireland region. It is noted that a plethora of business support agencies are in operation throughout the region, and Carrickfergus Borough Council would welcome the streamlining of such services to provide a more joined-up service to Northern Ireland businesses.

### **Question 4: What are your views on the proposed strategy, priority, key areas of expenditure and allocations for the ESF Employment Programme?**

Carrickfergus Borough Council is supportive of increasing employment and the skills of the Northern Ireland workforce. It is vital that the actions delivered via the programme are additional to those already being undertaken by the Department of Employment and Learning. The role of Local Authorities, Institutes of Further and Higher Education, Local Enterprise Agencies and Universities should be recognized as the key drivers of delivering skills to meet local needs.

**Question 5: What are your views on the cross cutting theme for both Programmes of ensuring equality and promoting sustainable development, and creating sustainable communities?**

The cross-cutting approach is welcomed in the interests of reducing duplication and minimizing displacement, promoting sustainable development, equal opportunities and economic and social inclusion.

**Question 6: What are your views on the management and implementation arrangements for both Programmes, including the simplified delivery structures, co-ordination arrangements with other Community Programmes and technical assistance proposals?**

Carrickfergus Borough Council believes that delivery of these programmes should, in light of post-RP! A structures, be led by Local Authorities. The necessary budgets and resources to undertake delivery should be allocated to Local Authorities, initially on an individual basis. It is noted that a number of government agencies have been suggested to manage the programme. Carrickfergus Borough Council would be concerned that this might lead to the replacement of treasury funds with EU funding, and that a top-down approach to delivery may not result in objectives being met. Local Authorities are well-placed to identify needs and priorities, and to work with local communities to ensure these are addressed. Finally, it is vital that delivery agents have the appropriate technical assistance.

## **CBI**

### **Introduction**

- 1 CBI Northern Ireland welcomes the opportunity to comment on the Department of Finance and Personnel's consultation document on EU Structural Funds 'Northern Ireland Competitiveness and Employment Programmes 2007-13'. We have consulted our members on these two draft programmes and this response reflects the key messages emerging.
- 2 CBI members have commented on the difficulty and challenges of responding to this document when the overall context, in particular relating to the outcome of the Comprehensive Spending Review, is still not clear. Clearly the EU Structural Funds are only a small part of overall public expenditure, and there is a danger that the funds could be spread too thinly over too many areas. At the same time we recognise, and support the need for, some flexibility within the programmes.

### **General Comments**

- 3 We have summarised our key comments below:
  - The socio-economic analysis relating to the ERDF Competitiveness Programme is comprehensive and acceptable
  - The Labour Market Analysis in the ESF Employment Programme is generally supported though we believe the falling numbers of students doing STEM subjects at Level IV (and in chemistry and physics at 'A' level) should be recognised as a weakness
  - The overall split in funding both across the two programmes and within the priorities of each of the programmes is supported
  - Both programmes do talk about focusing on key issues, but in most cases the focus is exceptionally wide and there is danger that resources will be spread too thinly to make a material impact
  - Our biggest concern is whether the two programmes are sufficiently complimentary; while there is a (very welcome) major focus on increasing investment in research and technological development and innovation in the ERDF programme this is not reflected in the ESF programme, where there is little reference to STEM skills, and no funding appears to be available for Level IV skills
  - A clearer focus on the outcomes expected from both programmes would be useful
- 4 With regard to the ERDF programme
  - While there is some reference to the importance of exporting, the overall programme and activities does not include any support – yet unless Northern Ireland achieves significantly higher exports we are unlikely to be able to transform the economy

- Within the ERDF programme we strongly welcome the focus on innovation and R&TD but it is light on the promoting the science aspects.

5 With regard to the ESF programme:

- There is much to welcome in the overall programme/priorities
- As in the ERDF programme the two priorities are very broad which does raise some concerns regarding what key outcomes will be achieved
- There is a considerable amount of 'softer activities' re mentoring and assisting clients which is welcome but much of this does lack focus – furthermore there appears to be a considerable overlap between Priority 1 and the aspects of Priority 2 which is unhelpful
- To achieve the outcomes we believe the programme will seek to deliver will require much improved careers information, education and guidance – we would have welcomed a specific action to address this
- As stated above a key weakness is that support for Level IV skills appears to be absent

### **Specific Comments**

6 In addition to the general comments we have set out above there are some additional more specific comments we would wish to make on the consultation proposals.

With respect to the ERDF programme:

- As the Northern Ireland economy develops we believe there should be greater focus on developing and growing existing businesses. Efforts at promoting start-up businesses must be more strongly focused at creating export-orientated companies
- The programme refers to the need to increase survival rates – but in Northern Ireland these are already the highest in the UK
- We also need to move away from job creation per se – we have a good track record here in recent years. The biggest challenge for Northern Ireland is to create high quality, well paid jobs – this will be the key economic driver going forward and should be a key outcome of the ERDF programme – a qualitative measure is essential in any target which refers to job creation
- Para 1.28 refers to low property prices – this is incorrect. It should refer to low property costs (and specifically rating costs) – property prices are now higher than the whole of the Midlands, northern England, Scotland and Wales

7 With respect to the ESF programme:

- A key barrier to increasing economic activity rates is the lack of affordable, high quality childcare provision – we are surprised that this does not appear to be included in the activities which the ESF programme can support. We hope this can be corrected in the final programme.
- We would seek clarification on the need for all training to lead to a qualification – a significant level of valuable training takes place which may not result in a formal qualification (but it could and should be accredited) – we hope the ESF will allow some flexibility in this respect
- Northern Ireland employees receive less training than in other parts of the UK – we would have welcomed clarification and better understanding about the reasons behind this, which may be structural
- DEL has confirmed that all FE provision will ensure that the essential skills (numeracy/literacy/ICT) will be an integral part of the training and qualifications achieved and will ensure that the student is able to progress effectively into work or further training – we would like some reassurance that Community Sector Training will also ensure that all trainees are suitably prepared for the world of work

CBI Northern Ireland  
13 March 2007

## Cedar Foundation

Question 2:

What are your views on the labour market analysis relating to the draft ESF Employment Programme?

The Cedar Foundation welcomes the recognition that there is a need to reduce the high numbers of economically inactive, improve the skill and qualification levels of existing employees as well as those seeking to enter employment, whether young people are those who are unemployed. This is particularly the case for people with disabilities and this has been recognised by work recently promoted by the Promoting Social Inclusion Disability Working Group of OFMDFM, in particular the Employment Sub Group. The Group has identified the following priority issues to be addressed by government:

- Supporting disabled people into work – transition, preparation, job seeking support, meeting the needs of people with significant disabilities
- Supporting disabled people in work – advocacy, advice and information, adaptations, rehabilitation and return to work, career development
- Supporting employers – including information and advice, assistance with forward planning and policy work, strategies to engage small to medium enterprises
- Wider issues – primarily benefits but also barriers including transport, access and social care
- Culture and attitudes – equality, rights awareness, changing attitudes.

The Voluntary Disability Sector has a significant track record in accessing and deploying ESF funds to build organisational capacity and infrastructure to meet the needs of Disabled People. This has resulted in a comprehensive sectoral response that has been supported by a range of government departments ensuring that the social and economic exclusion of people with disabilities is addressed.

The Foundation recognises the need for a continuum of support for people with disabilities through training, initial job searching, job finding and ongoing support for as long as each individual needs it. The current ESF programmes add significant value to the current range of mainstream programmes, in particular New Deal, Pathways and Jobskills programmes. ***The proposed new ESF programme is ideally placed to create additional added value to this continuum as it can interface effectively with new and emerging mainstream programmes including Training for Success, and Workable (NI). However, any reduction in the existing range of provision funded by ESF would have a negative impact on the accessibility of these programmes to disabled people.***

Question 4:

What are your views on the proposed strategy, priorities, key areas of expenditure and indicative allocations with a focus on the priorities of the ESF Employment Programme?

The Cedar Foundation has fundamental concerns about the proposal to transfer employment and skills activities currently funded under the Peace II Programme to the new ESF programme. The proposed resource allocation is insufficient to meet the needs of the current level of activity and potential transferees. Secondly, the Peace distinctiveness which has made a major contribution to the development of social and economic stability as part of the Peace Process will be lost with this transfer.

It is the view of the sector that there will still be a requirement for the retention of a significant level of delivery within the current Peace III Programme and transfer to the ESF programme without a comparable transfer of resources from ERDF would be detrimental to the current range of provision. ***It would therefore be our strong recommendation that training projects remain within the domain of Peace III as provision has been made under the European Regulations to specifically target training as a fundable Peace initiative. (Ref – Council Regulation EC 1080/2006, Article 6.1 )***

The Voluntary Disability Sector has historically targeted those that are furthest from the labour market. This has been particularly highlighted again by the PSI Working Group on Disability and Employment.

The Cedar Foundation welcomes the objective to increase employment and reduce unemployment for people with disabilities and health conditions. We welcome the recognition of activities, in particular the intention to develop programmes that are client focused, flexible with outreach, addressing a broad range of essential skills and the intention to provide on-going support.

We note the intention to provide for up to 6 months support after gaining employment. We feel that this is insufficient to meet the needs of those that are furthest from the labour market, in particular those who have complex needs, including underlying long term health care conditions. ***Experience has clearly demonstrated that support over a 1 – 2 year period is often required to sustain employment outcomes for those with more complex disabilities/conditions, for example Traumatic Brain Injury.***

We welcome the intention to target those experiencing multiple disadvantage to progress towards the labour market. We welcome the fact that outcomes will be measured in terms of action plans, referrals to programme and participation in a range of programme activity, such as job taster, self confidence, etc.

It is the experience of the Cedar Foundation that significant progress can be made towards the employment market if a clear focus is placed on building individual capacity, self worth and personal esteem.

We particularly welcome the intention to recognise softer outcomes and that these will be analysed in evaluation studies. A significant amount of work is currently being undertaken in the Voluntary Disability Sector to progress this matter and a range of case studies are readily available to demonstrate the value of different approaches.

#### Addressing Priority II – Improving Work Force Skills and Adaptability

We note that the objective of Priority II is to develop a skilled and adaptable workforce by improving the acquisition of levels 1, 2 and 3 qualifications. We wish to express considerable concern that people with disabilities are not highlighted as a potential beneficiary group, as this would provide a significant opportunity to enjoin activities under both Priority 1 and Priority 2 with the aim of improving workforce skills and adaptability.

An important interface has been developed between the Voluntary Disability Sector and Further & Higher Education to promote these opportunities. Inclusion of people with disabilities as a target beneficiary group would provide the opportunity to strengthen and develop this work. However there needs to be an enhanced level of transparency in relation to the allocation of funding with a particular emphasis on the role of the voluntary and community sector in developing Pre-Level 1 skills to enable people with disabilities to access mainstream provision in this environment.

We welcome target 3.28., in particular the recognition that for some participants the outcome will be a qualification, but for others the outcome will be engagement in education or training. For many people with disabilities, the process of engaging in a mainstream inclusive environment is a significant outcome in itself.

Question 5: What are your views on the proposed cross cutting themes for both programmes of ensuring equality, promoting good relationships and sustainable development and creating sustainable communities?

The majority work in the Voluntary Disability Sector to promote employment opportunities for people with disabilities has been progressed through previous ESF programmes. This has in the main been achieved by progressing cross cutting links between employment and learning and health and social care. The delivery of the new programme will provide the opportunity to strengthen the link between health and social care programmes and the progress of people with disabilities and long term health care needs to social/economic gain and employment outcomes.

*This work will enable the achievement of a number of objectives espoused in the **DHSS&PS Strategy : A healthier future, a twenty year vision for health and well being in Northern Ireland 2005-2025.** The Strategy particularly focuses on the importance of tackling social exclusion and the*

*harm associated with it. It is therefore essential that there is cross departmental liaison between DEL, DHSS&PS and DFP to:*

- 1. Assure the sustainability of current programmes.*
- 2. Address longer term stability by developing a joint approach to progressively enhance match funding and a commitment to mainstream funding during the lifetime of the new programme.*

Question 6: What are your views on the proposed management and implementation arrangements for both programmes including simplified delivery structures, co-ordination arrangements with other community programmes and technical assistance proposals.

We note in particular section 18 – the ESF programme – it is proposed that the Department of Employment & Learning will be the accountable Department for all proposed expenditure and should carry out the managing authority functions of the programme.

The current arrangements between the Department of Employment & Learning European Unit and the broader Voluntary Disability Sector currently work extremely well. There is a high level of professional engagement with the sector enabling a smooth and efficient delivery of the programme. ***It is essential that the assumption of these additional responsibilities does not have a detrimental impact on the current management arrangements, and sufficient resources are provided to maintain the current high standards.***

Additional Points:

1. Transitional arrangements between BSP and new ESF Programme:

The Voluntary Disability Sector has had extensive experience in managing the transition between ESF programmes. Our experience in the past is that this has been extremely challenging for both the managing authority and the delivery agents. It is essential that a smooth transition is achieved between the proposed and current programme. Uncertainty and time delays put at risk the infrastructure and thereby the capacity of the Voluntary Disability Sector to respond effectively to the priorities and challenges of delivering the new programme.

A key recommendation of the Strategic Review of Disablement Advisory Service Programmes and Services (DEL June 2006) by the Disability Liaison Group was that “DEL must work with DFP to ensure that by March 2008 programmes and services presently funded through European Structural Funds are transferred to mainstream funding”.

***In the event that a smooth transition cannot be achieved as a result of slippage in planned timetables, it is essential that the Department of Finance and Personnel engage with the appropriate government departments to put in place an appropriate transitional funding regime to assure sustainability of the current infrastructure.***

2. New programme funding timescales

It is essential that the managing authority recognises the importance of effective funding timescales to allow the efficient delivery against the proposed objectives. 'Positive Steps' (The Government's Response to *Investing Together*: Report of the Task Force on Resourcing the Voluntary and Community Sector) clearly highlights the importance of having a longer term funding strategy for the sector. ***It is essential that the managing authorities adopt the recommendations outlined within 'Positive Steps' and at the very least provide the opportunity for 3 year funding under the new programme.***

## **Coleraine Borough Council**

### **Question 1: What are your views on the Socio-Economic Analysis relating to the draft ERDF Competitiveness Programme?**

The Socio-Economic Profile provides a useful overview of the NI economy. We agree that Northern Ireland does need to improve upon its innovation and enterprise levels, build on the current infrastructure and increase the employment rates for all groups in the labour market. We also agree that it is essential to reduce the high numbers of economically inactive and improve the skills and qualifications levels of existing employees as well as those seeking to enter employment, whether young people or those who are unemployed. However, the practicalities of tackling these challenges against a backdrop of an economy which has been dominated by public sector employment for the past 30 years will be no simple task. Although the strategy highlights that it would like to grow the private sector the report does fall short in stating how it intends to achieve this against the backdrop of an economy which after many years of government interventions still remains one of the weakest in the UK particularly in terms of business start-ups, quality and quantity of medium sized companies, and an under-representation of Foreign Direct Investment. In addition, the report does not provide details of how it intends to absorb or utilise the jobs which are becoming available due to the reduction in public sector employment: the current government's agenda. There need to be actions laid down clearly demonstrating the government's plan to tackle this issue in the short-term by providing opportunities in the private sector- otherwise the NI economy could be faced with a major unemployment crisis.

### **Question 2: What are your views on the Labour Market Analysis relating to the draft ESF Employment Programme?**

With the challenges highlighted in question 1 above, the Labour Market Analysis highlights additional challenges in relation to the skills and employability of the existing and potential labour market in NI which could potentially stem the potential growth required to enable NI to compete on the global stage. Despite the fact that unemployment has been at its lowest point in years in Northern Ireland and we have an inflow of young and well educated people, the economy is still the lowest developed in the UK. Issues identified such as the lack of the on-the job training from the private sector (which is dominated by small micro businesses), and the skills gap between the public and private sectors need to be addressed if the economy as a whole is to grow and progress. However, NI has long been proud of their excellent education systems and their impressive 'A' level results however this does mask the reality that a large percentage of our population has no skills at all and almost 25% of our population do not possess basic literacy and numeracy skills (Basic Skills Unit). This coupled with the fact that we have high levels of long term unemployed and an economically inactive labour market has resulted in an over-reliance on the benefits system. All of these factors combined really beg the question how can we successfully grow the

private sector and find the skills they require to compete in the global environment?

It is clear from the Labour market analysis that NI suffers from the phenomenon of having low-value sectors and industry which in turn provide low value employment opportunities. We are fortunate enough to have many thousands of students graduating each year from our two Universities in Northern Ireland. However the difficulty remains in retaining these resources and providing opportunities in either business or employment locally. Unfortunately, the 'brain drain' has resulted in many of these valuable resources moving to other areas in ROI and the UK where they will be able to take advantage of 'high value' employment. The report does seem to have omitted the approach required to retain this valuable resource by offering interventions which encourage them to start-up a private business or be employed at a local level.

**Question 3: What are your views on the proposed strategy, priority, key areas of expenditure and allocations for the ERDF Competitiveness Programme?**

The growth of low cost producer economies poses real and long-term threats particularly to Northern Ireland and as a consequence, the new EU funding from ERDF is to be prioritised towards:

1. Promoting Research and Technological Development (R&TD) expenditure in local businesses
2. Improving enterprise performance to catch up with the best performing regions in Europe
3. Creating a better climate for existing businesses to expand and encourage new entrepreneurs
4. Raising the skills of the current workforce and encouraging take up of recent advances in technology.

The three priorities of the draft ERDF Programme, with indicative overall programme budgetary allocations, are as follows:

- . Increasing investment in R&TD and promoting innovation (£220 million)
- . Promoting enterprise and entrepreneurship (£145 million)
- . Improving accessibility and protecting and enhancing the environment (£52 million)

The primary thrust of the strategy is to focus on the Lisbon agenda which means that all activity must contribute directly towards business development. This means that the strategy is quite restrictive in comparison to previous European Structural Funds activity. There is a clear justification for growing

the private sector in NI and hopefully this programme will contribute towards sustaining economic growth by contributing towards creating the right conditions for businesses to flourish and expand. In terms of the priorities identified we don't think anyone could disagree with the need to encourage more R& D activity within the local business community. To date, a large percentage of R&D activity has been monopolised by the University Institutions in Northern Ireland - however there has been minimal success of interaction between Universities and the small business sector. Small businesses are less likely to have either the capability or the awareness of the possibilities inherent in working directly with our universities. As Northern Ireland is a micro business economy it is difficult to achieve any connectivity in terms of R&D, and we therefore welcome the promotion and integration of the Further Education (FE) Colleges to engage and service the needs of the local businesses. It is important that the FE college becomes the intermediate link which can and when necessary act as a broker with the Higher Education sector for local industry.

In terms of promoting Enterprise and Entrepreneurship Northern Ireland does have many opportunities but faces many challenges also. We have the lowest levels of business start ups in the UK plus we have very few export orientated businesses. This coupled with the lack of inward investment into Northern Ireland means that we have performed extremely poorly. As highlighted above, much has been invested by government intervention over the past thirty years with little success. Therefore, more of the same initiatives are not recommended. These issues coupled with the fact that we have a saturated market of business support organisations who rely on government funding means that surely it must be time for rationalisation and more focused use of Government and European resources. Without this rationalisation it will be difficult for the objectives and targets set out in the strategy to be met.

Tourism has the potential to become a key sector in the transformation of Northern Ireland and could contribute significantly towards economic growth. We welcome the recommended interventions which would look at the long-term sustainability of the tourism sector. Initiatives focused around encouraging longer staying visitors, more spend, focused macro investment and the delivery of major projects such as the signature projects. However, these initiatives alone will not contribute towards greater entrepreneurship or business creation. On this note, we would also encourage greater liaison with local players such as the local Councils to encourage a focus on micro tourism development, which would encourage the development of more private businesses & organisations within the tourism industry locally.

As a local Council, protecting, enhancing, appreciating the natural environment, promoting sustainable development and creating sustainable communities is always a key consideration. Improving the infrastructure deficit which exists in Northern Ireland should be a key focus to any strategy proposed by government. The deficit in IT infrastructure, roads, telecoms & electricity are key requirements of any indigenous business or potential Foreign Direct Investing business. Without this we will not be able to compete. This coupled with the drive to promote and use renewable energy and

problems associated with renewable energy sources will need interventions to ensure that they are given priority with businesses in Northern Ireland. We welcome any initiatives which apply the principle of sustainable development to waste management which promotes or delivers waste prevention and recycling and recovery.

**Question 4: What are your views on the proposed strategy, priority, key areas of expenditure and allocations for the ESF Employment Programme?**

The overall strategic aim of Northern Ireland's ESF Programme is to help reduce economic inactivity and increase workforce skills. The overall objective of the draft ESF Programme is to contribute to meeting the key challenges of:

- . Increasing the employment rate for all groups in the labour market;
- . Reducing the high numbers of economically inactive
- . Improve the skill and qualifications levels of existing employees as well as those seeking jobs, whether young people or those who are unemployed.

As highlighted above the plethora of business support organisations and the provision of European funds in the past has contributed to the creation of organisations being formed to avail of the opportunities provided by European funding which has on many occasions resulted in duplication of effort. The many schemes which have been proposed by government in the past have somewhat failed to tackle the above challenges so it is essential that effective interventions are developed to meet the aims and objectives of the programme. The inability to engage employers in the private sector in the past has been paramount to this problem and therefore, it is essential with the proposed new strategy that the proper skills and training labour market interventions are tailored to meet the 'actual' demands of the business. Again, as highlighted above, there needs to be greater effort made to match the research capabilities and teaching syllabuses of the Universities to the needs of the private sector. To complement this activity, there also need to be upskilling programmes targeted at the economically inactive and underemployed in the disadvantaged areas such as urban estates and rural areas, to ensure a ready supply of labour as and when required by the private sector. This could be delivered in partnership between the local Councils and the appropriate statutory bodies.

In order to meet the needs of the private sector, the labour market needs to engage in life long learning and re-skilling to take cognizance of the constant and fast changing environment in which we live. The ESF programme needs to consider these issues when implementing the new programme.

**Question 5: What are your views on the cross cutting theme for both Programmes of ensuring equality and promoting sustainable development, and creating sustainable communities?**

The cross cutting approach should be welcomed in the interests of reducing duplication and minimising displacement, promoting sustainable development, equal opportunities and economic and social inclusion.

**Question 6: What are your views on the management and implementation arrangements for both Programmes, including the simplified delivery structures, co-ordination arrangements with other Community Programmes and technical assistance proposals?**

From the consultation document it is still relatively unclear what role Councils will have in terms of delivery within both new programmes. From the indicative financial allocation proposals included in the consultation document it highlights that £50 million will be made available for Local Economic Development activity which would suggest that Councils will be delivering a similar allocation to that of the previous programme. The document also fails to indicate what remit, responsibility, and share of the budget the government bodies such as Invest Northern Ireland and Northern Ireland Tourist Board will play in the delivery of the new programme. No criteria has been provided indicating how government bodies will be selected.

We believe that both programmes should be delivered through more local and sub-regional bodies including regional groupings of Councils. With previous programmes, Central Government were responsible for administering large blocks of European Funding. This seems to be the case being put forward again with this new strategy 2007-2013. It seems that out of the £325 million programme proposed only £25 million is being considered to be delivered through local delivery. There seems to be a complete absence of any local delivery on the ESF element of the strategy. Local Councils are particularly well placed to identify real local needs and priorities. The rapport that has been established with businesses of all sizes within their local Council areas over the past three European rounds of funding (15 years) means that they are best placed to develop initiatives based around local needs and priorities.

New Community Planning powers will be devolved to local Councils in Northern Ireland under the proposed Review of Public Administration which means that Councils will enjoy an enhanced role in the delivery of traditional central government services locally. To enable Council to fulfil this role to it's full potential it is essential that greater consideration is given to more local delivery of the priorities identified in the strategy at the local Council area.

## **Committee on the Administration of Justice**

Thank you for sending the Committee on the Administration of Justice (CAJ) the above document, which we read with interest. While we would not claim to be experts in the field of EU funding programmes, we do have a particular interest in the promotion of equality across the grounds covered by Section 75 of the Northern Ireland Act. Indeed, we believe that Section 75 provides an excellent opportunity to deliver greater equality by ensuring that all areas of government activity are examined in order to determine whether the range of needs of the different groups across society are being met. Due to resource constraints we are not able to provide you with as comprehensive a response as we would have liked. However we believe that there are a couple of important issues, largely related to the equality aspects of the consultation, that we would wish to draw to your attention.

In general we found the socio-economic overview and summary labour market analysis provided by the Department for Employment and Learning (pages 94-99 of the document) fairly comprehensive. We did feel, however, that there was one important omission from the document in relation to the employment gaps identified. We note that the document lists gaps in employment facing people with disabilities, lone parents, older workers, young people, women, people with low qualifications and geographic areas of worklessness.

Unfortunately there is no reference to the employment gap on grounds of religion, something that CAJ highlighted recently in a report we published in October 2006 entitled "Equality in Northern Ireland: the rhetoric and the reality" (copy enclosed). Our report cited data contained in the 2003 Labour Force Survey Religion Update (NISRA, 2005) which compared economic activity rates for those of working age across the two communities, showing the figure for Protestant as 76.4%, while the corresponding figure for Catholics as 67.9%. Data in the same report also showed a significant gap between the proportion of each religion in employment as a proportion of all those economically active and inactive of working age. The figure for the Protestant community was 72.5%, while the corresponding figure for the Catholic community was 62.9%. Given these clear employment gaps between the two communities, and the need for public bodies to ensure equal application of Section 75 requirements across all nine categories, we would recommend that the document be amended to include the material identified above.

Looking at the issue of whether or not both programmes should be subject to a full Equality Impact Assessment (EQIA), we note that the EQIA Screening part of the ERDF Co-financed Programme 2007-2013 states that this programme does not need to be subject to a full Equality Impact Assessment. The rationale for this seems to be that activities under the programme will be available to applicants irrespective of their Section 75 status (Pages 74-85 of the document) with the document essentially going through each of the Section 75 groups in turn stating that they would not be excluded from applying for the funds.

A typical example is found on page 77 which states that “*activities funded under the Northern Ireland ERDF programme will be available to applicants irrespective of religious belief*”. In our view, ensuring that a programme is open to all groups is merely an exercise in avoiding discrimination. The purpose of Section 75 is to seek to actively promote greater equality and go beyond the mere avoidance of discrimination. Equally, the preliminary EQIA of the NI European Social Fund programme states that a full EQIA is not required given that activities funded under the ESF programme will be available to all groups (Pages 151-162 of the consultation document). Again, a typical example can be found at page 154 which states that “*activities funded under the Northern Ireland ESF Programme will be available to applicants irrespective of racial group*”.

CAJ disagrees with the approach adopted in both cases which we believe is not in line with the EQIA Guidelines issued by the Equality Commission. The purpose of an EQIA is to ensure that there are no unintentional/unexpected differentials across any of the Section 75 groups. Given that significant differentials already exist across the Section 75 groups in terms of unemployment, economic inactivity etc, it is all the more important that these existing structural differentials are not replicated by the very programmes that are meant to tackle these problems in the first place.

An example of the kind of problems that can arise in this area is to be found by examining the recent EQIA of the New Deal programme. The purpose of New Deal was to ensure that those who were unemployed were assisted in returning to employment. However, the EQIA of New Deal has revealed that some groups, such as Catholics, have lower success rates in terms of finding employment as a result of the programme, given that they are more likely to live in areas where there are fewer jobs. While New Deal does not set out to create disadvantage on grounds of religion, existing labour market problems mean that differentials in relation to employment are replicated by the programme itself.

The key question therefore from CAJ’s point of view is whether both these EU programmes will actually address existing inequalities and gaps in the labour market – or merely replicate them. In other words, will “those worst off” lose out under these programmes to those “not as badly off”. CAJ is of the view that the only way in which this can be determined is to have a full EQIA of both the EU Competitiveness Programme and the European Social Fund Programme. An EQIA would be able to determine whether either or indeed both programmes have any unintended consequences for any of the Section 75 groups. Moreover, the ongoing monitoring for potential adverse impact that constitutes the final stage of the EQIA would allow for everyone to have confidence that the progress of both initiatives was being adequately examined over time.

We hope that you find these comments useful, and should you have any queries regarding any of the matters we have raised please do not hesitate to contact me.

## Community Relations Council

The Community Relations Council (CRC) is primarily concerned with promoting Community and Good Relations and the development of a shared and peaceful future. In recent years, CRC has actively sought to bring pressure to bear on all public agencies to take seriously the implications of 'A Shared Future', which has tasked government departments and agencies to develop and implement policies that establish ***'over time of a normal, civic society, in which all individuals are considered as equals, where differences are resolved through dialogue in the public sphere, and where all people are treated impartially. A society where there is equity, respect for diversity and a recognition of our interdependence'***.

Council welcomes the opportunity to contribute to this consultation on the NI Competitiveness and Employment Programmes 2007 – 2013. We are mainly interested in how these two programmes can contribute to promoting good relations and fulfilling the obligations of DETI and DFP as set out in A Shared Future (ASF) (appendix 1). We are pleased that Good Relations and the government priority A Shared Future are stressed as important cross cutting themes which must be considered when implementing the various themes of the programmes. The programmes are committed to delivering Section 75 obligations but also recognise the challenge ahead. Council acknowledges good relations is a challenge but is one that cannot be ignored if we really want to achieve a shared future. Furthermore, in our recent response to the Equality Commission's Guidance on Good Relations we noted our concern that whilst some public authorities have embraced S75 (2) Council is also aware that some authorities do not see this duty as relevant to their organisation, or more importantly do not want to open the dreaded 'can of worms'. The competitiveness and employment programmes must focus on devising plans and actions that can be delivered cross community - there are many aspects of these programmes which can positively contribute to building a shared future and these cross cutting themes should be a reference point from a planning point of view. Our response focuses on sectarianism and the growing problem of racism within our society and the need to ensure these twin evils are tackled together - A Shared Future is now a precondition of economic success, not the other way around.

The SWOT analysis carried out for both programmes registers the 'peace process' as an opportunity, and one that has to be maintained and nurtured. This 'opportunity' should not be taken for granted; the peace process has to be proactively approached and Council wants to underscore the need to approach good relations and ASF in a positive and practical manner. An ad-hoc approach is not sufficient.

Another important issue to consider within the SWOT analysis is the continued threat of racism. Northern Ireland is experiencing a growing labour market and many are migrant workers. A society steeped in two mutually antagonistic cultural 'traditions' which is hostile to newcomers will endanger its progression towards economic prosperity and the following points of

information highlight the need to cement all policy with ASF and Good Relations.

- More than 2/3 of people believe there is more racial prejudice than there was 5 years ago (NILTS 2005)
- 1% of people are very prejudiced and 24% of people say they are a little prejudiced against people from minority ethnic communities (NILTS 2005).
- Racial offences increased from 322 in 2004/05 to 351 in 2005/06 (PSNI 2005/06).
- Only 17% of people agree they know quite a bit about the culture of some minority ethnic communities in NI (NILTS 2005).
- Half of the population believe minority ethnic communities are less respected than they once were (NILTS 2005).
- *Fifty-four percent of students had witnessed some form of racism. This had mainly taken the form of verbal abuse (50%) or rudeness and hostility (33%), while 21% had witnessed property being damaged and a further 21% had witnessed physical violence. Of the 54% who had witnessed the acts of racism, the majority, 38% had ignored the incident, while 13% reported that they had challenged the behaviour. Only 2% had reported the incident to the PSNI and 1% had reported it to someone else. New Migrant Communities in East Tyrone, A Report for East Tyrone College, July 2005.*
- *Exploitation of the growing number of migrant workers in Northern Ireland was confirmed yesterday in a study by the Irish Congress of Trade Unions (ICTU). It also highlighted widespread racism and sectarianism experienced by those who have travelled to the province in search of work – suffered both in the the work place and outside. It concluded that trade unions had both a duty and the capacity to organise and represent migrant workers.*

Northern Ireland's goal must be to become a dynamic region, one that tolerates and attracts cultural diversity, and one that will ultimately generate and support new business ideas that increase its competitiveness. Good Relations must be an essential component of public policy.

Council would like to focus on a number of other issues when considering the economic activity or inactivity of individuals and groups in Northern Ireland, and the opportunities available to reinforce Good Relations and ASF within both programmes:

#### *Barriers to employment*

A number of obstacles are identified in relation to why some groups experience difficulties engaging with the labour market or those that remain economically inactive despite employment opportunities. These hurdles included a skills deficit among certain groups, childcare, ill-health and mobility issues. It is important to put these issues within the context of Northern Ireland and the segregated nature of our community. Access to employment can be restricted because of where you live and where you have to travel to work i.e. if you rely on public transport to get to your place of work and this

involves traveling within an area that you feel uncomfortable in e.g. paramilitary flags, painted kerbstones and other territorial markings – these will all have an impact on where you will consider seeking employment.

The University of Ulster's recent study on 'Breaking Down Barriers', examined issues around sectarianism, unemployment and the exclusion of disadvantaged young people. Council has attached the summary of the key findings and believes it is essential to take this research into consideration when devising ways to reduce social exclusion and improve economic and employment opportunities in areas of high deprivation. The researchers found evidence that:

- The main reason for not working in a politico-religious out-group area was fear.
- Neutrality in the workplace and in the local environment (i.e. no graffiti) were important in encouraging people to work in other areas.
- Sectarianism is the norm in these communities and this has been a major barrier to employment.

These are only a sample of the views held by many of the young people. Council wants DFP to further recognise the impact of the legacy of the conflict in Northern Ireland and acknowledge these issues as chill factors and how they present additional barriers e.g. feelings of safety and issues around traveling to/access to work. Acknowledgement will generate the opportunity to develop creative solutions to these hurdles.

### *Opportunities*

Within the two programmes are a number of opportunities that could harness good relations and move ASF forward in real terms. Whilst ASF and Good Relations are identified as cross cutting themes, the real task is how they become practical out workings among the different priorities. One priority examines enterprise and entrepreneurship and Council believes this should be delivered with ASF in mind i.e. on a cross community basis. Current models of good practice include the Suffolk/Lenadoon Interface Group who have not only created shared spaces but have achieved this through a local social economy project e.g. a child care facility and local retails outlets. Similar groups in disadvantaged areas are beginning this process of discussing how they can develop business skills within their communities and ultimately how this can result in local employment. It is important to acknowledge that these developments are part of a long term process and support must be available at the different and sometimes difficult stages of the project.

Another priority is protecting and enhancing the environment. Within this priority a number of actions are identified, one being the renovation of redundant military bases. This is an area that is being advanced through ASF lens e.g. the regeneration of the Crumlin Road Gaol. This is an example of strong partnership which involves representatives from the statutory and community sector as well as local political representatives. This approach is crucial to encouraging dialogue and ensuring ownership of the project at local level. The final project will deliver real benefits for the local community in

terms of possible employment, but also developing a new space which the whole community can access. This will be area of huge development over the next few years and it is important that strategies such as the competitiveness and employment programmes acknowledge and recognise the work that is in progress to remove barriers and build working partnerships between our fractured communities.

There are issues around having equal access to services and facilities and how this can impact on the amount of income one community has to spend in order to purchase goods. The consultation notes that fuel, food and necessity goods are more expensive in NI relative to the UK. How you access cheaper goods etc. at a local level and where they are located can impact on your disposable income. Therefore it is important to examine what opportunities exist in terms of how communities who are currently segregated interact with each other, and to learn and build on these models. Where do people interact and engage on a cross community basis, where are these businesses located and how can you create more opportunities to expand current businesses, locate new enterprises and development training facilities in the area.

#### *Further Education Strategy and Skills development*

The ESF Programme identifies the FE Strategy as a playing an important role in ‘enhancing social cohesion and in providing opportunities for lifelong learning’<sup>1</sup>. This also links into the low level of job related training in Northern Ireland and what opportunities can be generated on a cross community basis within the FE sector. The FE sector can and already does play an important role in the delivery of ASF and the promotion of Good Relations. Council has attached a case study on ANIC and the **A.G.R.E.E Programme** (Actioning Good relations, Equality and Equity) which was delivered over a four year period and sought to ensure that equity and respect for difference were placed at the heart of day-to-day life further Education Colleges in Northern Ireland.

#### *Trade Unions*

The work of trade unions is also particularly important in tackling sectarianism and racism within the workplace. Trade Unions are actively involved in finding practical ways to fight prejudice and are working to ensure the gains of the peace process do not unravel. It is important to acknowledge and support these efforts and work towards an equitable, diverse and interdependent society in order to attract and retain new labour.

#### *Targets*

Priority one is ‘*enhancing access to employment and the sustainable inclusion in the labour market of job seekers and inactive people, preventing unemployment, in particular long-term and youth unemployment, encouraging active ageing and prolonging working lives, and increasing participation in the labour market*’<sup>2</sup>. The outcomes for this priority include progressing towards labour market entry as well as identifying softer such as action plans and

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<sup>1</sup> Page 115

<sup>2</sup> Page 125

referrals to programmes. Council would like to see these outcomes strengthen with the inclusion of good relations indicators and attitudinal surveys.

CRC wants the EU Structural funds to examine the cross cutting themes of ASF and good relations in detail, and support projects that create new opportunities for sharing, that develop cross community ownership of spaces and employment and training opportunities? It should examine what incentives can be made available to target the hard to reach and discuss what positive actions need to happen to increase sharing and interaction between employers, employees and users? This work is already happening and the programmes should support similar projects in areas where it is most needed; the applications supported should proactively challenge the status quo and deliver real change for communities. It is important that government plan for the future. This round of financial support is due to end in 2013 and the pot of funding is increasingly shrinking. Consequently, subsidies are specifically targeted towards areas of public policy, and also used to compliment the work of strategic government policy – e.g. the Regional Economic Strategy currently out for consultation. It is essential Northern Ireland has contingency plans to survive reduced funding from Europe.

## Appendix 1

### A Shared Future – Triennial Action Plan 2006

#### Headline Actions for DFP & DETI

The Department of Finance and Personnel will

- ensure that all proposals for public expenditure include an assessment of how they will contribute to the promotion of good relations as well as the New TSN and equality. Proposals will not be considered if this is not included;
- continue to ensure good and harmonious working places and relationships and that front line staff are fully trained and aware of the implications of the principles of A Shared Future for service delivery;
- identify and implement opportunities to reduce the costs of division across public spending, particularly in education and housing;
- support cross-departmental research to identify the costs of division, the baseline measure of the health of good relations and arrangements for monitoring and evaluating the implementation of A Shared Future and its impact on the health of good relations over time; and
- oversee, in collaboration with OFMDFM, the development of appropriate training support programmes and material to support good relations considerations at all levels of NICS.

The Department for Enterprise, Trade and Investment will

- encourage the development of a high value added, innovative, enterprising and globally competitive economy leading to greater wealth creation and job opportunities for all. In support of A Shared Future it will:
  - reinforce the importance of stability in creating the environment necessary to enable indigenous businesses to trade, prosper and grow;
  - promote greater understanding and mutual respect among the Northern Ireland workforce regardless of religious/political background, race or level of ability; and
  - highlight the economic cost of a negative image of Northern Ireland created by community unrest in terms of lost investment, lost jobs and lost tourism.
- Specifically, DETI will,
  - work with the business community to raise awareness and understanding of the negative impact of sectarianism and racism on the local economy and promote the economic benefits of greater community cohesion;
  - encourage recognition of, and respect for, the vital role played by migrant workers in the local economy;
  - encourage the shared use of industrial space, particularly at interface areas (where practicable); and
  - challenge the costs of division.

## **Appendix 2**

### **Association of Northern Ireland Colleges (ANIC)**

In their response to the requirements of Section 75, the 16 colleges of further and higher education have adopted a co-ordinated approach. One central body, the Association of Northern Ireland Colleges (ANIC) provided each college with a common approach to organizational change, a strategy and a training package as well as pro forma responses for the colleges' annual reports to the Equality Commission

#### **ANIC and the AGREE Programme**

The **A.G.R.E.E Programme** (Actioning Good relations, Equality and Equity) was a four year strategy; (2002 - 2006 funded by the Community Relations Council), developed by Trademark in partnership with ANIC which sought to ensure that equity and respect for difference are placed at the heart of day-to-day life further Education Colleges in Northern Ireland.

ANIC was established in 1998 following the incorporation of the Colleges of Further Education in Northern Ireland. It is a limited company with charitable status. The Board of Directors represents the Association's memberships and comprises Directors of Institutions and Chairs of Governors.

The ANIC Equality Unit was introduced in March 2002 to assist colleges in meeting the provisions of Section 75 legislation and in aiding colleges to comply with this process through a co-ordinated approach.

#### **PROJECT AIMS:**

The aims of the AGREE programme were as follows:-

- to ensure that equity and respect for difference are placed at the heart of the college's structures, systems and cultures;
- To go beyond complying with legislation by ensuring organisational commitment to mainstreaming the principles and practices of equity, diversity and interdependence through a process of organisational change;
- To develop/implement "an inclusive and innovative change programme" which will look at how the FE sector might more fully engage with S75 considerations; and to model approaches which will allow for the mainstreaming of same over time;

To assist colleges to implement the seven steps of organisational change:

- 1) Invitation
- 2) To Establish Critical Dialogue
- 3) To Growing Leadership Commitment and Understanding
- 4) To identify the issues
- 5) Growing Commitment and Understanding Across the Wider Organisation
- 6) Experimenting and Modelling of New Working Practices
- 7) Implementing New Models of Practice into Mainstream Structures and Relationships

## PROJECT OBJECTIVES

The AGREE programme had the following objectives which were met:-

### Step 1:

- To establish a Project Working Group (who will agree a plan of work for Year 1);

### Step 2:

- To establish a Development Group which is representative of all current college structures (x24 Members involved in real dialogue about issues of conflict and division);
- To establish a Community Education Forum (x16 Members involved in dialogue);

### Step 3:

- To bring both the formal and informal leadership into new conversations around the principles of fairness and valuing difference (x24 Members of Development Group, x16 Members of Equality Forum, x16 Community Education Forum Members, x16 Board of Directors, x16 Governors, x16 Trade Union Members, x16 Student Executives, x4 Working Group Members);
- To recruit (over x6 days) and train a cohort of tutor/facilitators to undertake the preparation, strategic planning, deliver and evaluation of appropriate training course in relation to S75(1) & (2) (x16 College representatives);
- **To develop and deliver an accredited OCN training course on “Equality & Good Relations” – suggested modules: Equality Legislation, Understanding Equity, Diversity and Interdependence, Anti-sectarianism, Anti-racism, Strategic Planning and Programme Design, Delivery and Evaluation;**

### Step 4:

- To carry out an audit of programmes and activities (relating to issues of community relations, peace building and ED & I across the FE & H sector over x5 days);
- **To carry out a number of baseline scoping studies) and action research into ‘organisational culture’;**
- To produce accompanying materials;

### Step 5:

- To engage with the various inter-college groups and structures and deliver a programme of dialogue;
- To assist in the development of a training strategy for the colleges (senior staff, student representatives and others from the FE sector) to meet requirements under Section 75 NI Act 1998’;
- **To develop plans to implement a framework of organisational change based on the inclusive principles of equity, diversity and interdependence;**

### Step 6:

- To experiment with, and model, new working practices, policies, structures and support mechanisms;

**Step 7:**

- To implement new models of practice into mainstream structures and relationships
- A key objective was to provide mechanisms and methodologies which will allow community relations/considerations to become a self-renewing/sustaining feature of further education in NI.

**PROJECT OUTCOMES**

Outlined below are the outcomes of the programme:

- The establishment of new structures within colleges to deal with equality specifically, e.g. College Equality Working Groups
- The recruitment and development of Equality Trainers
- Development and delivery of OCN accredited programme “Equality and Good Relations Trainers Programme” to college staff. This programme was further developed by Trademark and delivered to other public sector bodies.
- The delivery of general awareness training
- The identification of equality issues within individual colleges
- The development of training materials
- Sharing and development of good practice and equality initiatives through the establishment of equality structures
- Cultural diversity and good relations are now included as elements of student induction and in some student curriculums.
- Growing confidence, knowledge and experience within Further Education to allow for the continuation of steps taken through the AGREE Programme

Throughout the life of the programme colleges, were provided with opportunities to build capacity and to challenge and overcome the politeness and denial that characterises individual and organisational approaches to the fundamental divisions that exist within this society and the increasing demands faced in dealing with an endemic and increasingly active racism.

Through the various strands of the programme this project has directly intervened in the political and cultural life of the colleges in an attempt to bring the development of positive community relationships from the periphery to the mainstream of organisational policy and practice.

There was a cumulative total of 2797 participants involved in the various activities during the 3 year programme. Activities included:

- Equality and Good relations Awareness Training
- Training & support for college Equality Working Groups
- Research Interviews
- Student Workshops/ training
- Residential
- Consultation regarding relevant college equality issues
- Anti-harassment training

- Staff surveys
- Policy development

### **Cultural Diversity Projects**

In addition to AGREE Programme in 2003, the Department for Employment and Learning provided financial support totaling £150,000 (£50,000 per pilot) for three Cultural Diversity pilot projects, which were completed in March 2005. The purpose of supporting three Cultural Diversity pilots was primarily to promote “Cultural Diversity / Good Relations” in the Northern Ireland Further Education (FE) sector, by providing opportunities for students and staff from differing identities, backgrounds and traditions to develop and enhance relationships of trust and understanding, and promote mutual respect in every aspect of college life. The four colleges involved were Armagh College, Belfast Institute, North West Institute and Upper Bann Institute.

### **Next Steps - Dissemination Programme**

Following completion of the pilots, the Department has decided to provide financial support to Colleges to facilitate the dissemination and roll out of Cultural Diversity/Good Relations best practice identified by:

- the Education and Training Inspectorate, in their report on the above Cultural Diversity Pilot Initiatives; and
- MORI Ireland/ Deloitte, in their “Chill Factor” FE research project, commissioned by ANIC.
- A total of £300,000 has been made available for this purpose between November 2006 -07.
- Whilst each dissemination programme is specific to the local context, generic activities include:
  - the collation and analysis of data on potential and actual learners from minority ethnic groups;
  - the development and introduction of codes of good practice for staff and students in relation to cultural diversity;
  - the engagement of students and representatives from groups reflecting a wide range of cultures and traditions in the development of whole-College policies on good relations;
  - the introduction of induction programmes for students and staff, focused on cultural diversity;
  - the completion of a full curriculum audit to identify where formal cultural diversity activities are integrated effectively into the curriculum, and to incorporate issues of cultural diversity and equal opportunity into quality assurance and course review processes;
  - the review of marketing and promotional materials, including prospectuses, to ensure that they portray, and are effective in recruiting, a diverse group of students.

ANIC is also currently undertaking research, funded by the Department for Employment and Learning into racism in further education, findings are due in early March 2007. In addition ANIC are developing a race equality plan in partnership with colleges and in conjunction with ECNI.

## **Council for Nature Conservation and the Countryside**

Thank you for the opportunity to comment on the above Programmes. Council for Nature Conservation and the Countryside (CNCC) is remitted to provide advice to the government on conservation, landscape and amenity issues affecting the land area and coastal waters of Northern Ireland and comments on this Consultation reflect that remit.

### **GENERAL**

CNCC understand that while a Strategic Environmental Assessment (SEA) will not be provided for the Employment Programme one will be forthcoming for the Competitiveness Programme. We look forward to receipt of that SEA for consideration and comment.

In general terms, Council notes the requirement that a minimum of 75 per cent of expenditure must be compatible with the Lisbon Agenda for jobs and growth and regrets the constraint which this places on delivering Gotenberg Agenda items. It appears that less than 4 per cent of the total budget (for the two Programmes) is presently available for environment specific initiatives which is disappointing in its own right, never mind that threat in paragraph 9 (page 3).

However, in the context of the overall Programmes, Council is pleased to note the emphasis which is placed on ensuring that funded activities are coherent, inter alia, with the Northern Ireland Sustainable Development Strategy.

### **QUESTION 3**

Council is concerned to note, and would strongly oppose, the suggestion in paragraph 9 that Priority 3, which contains the only provisions for pro-active environmental benefit, might be dropped in favour of having only two priorities. This suggestion does not rest easily with the emphasis elsewhere on the need to pursue sustainable development and to regenerate urban and rural environments. As already stated, the provision for environmental projects is very limited and to justify dropping Priority 3 by reference to its relatively small budgetary allocation would only compound the weakness of the overall Programme in terms of its contribution to the alleviation of well-known local environmental problems.

The under provision for environmentally beneficial activities is all the more stark when one considers the quite correct emphasis in Paragraph 3.37 on the importance of tourism to the Northern Ireland economy. A major selling point for Northern Ireland tourism is a very good natural environment, yet little in these Programmes will deliver on that objective.

**DR LUCINDA BLAKISTON HOUSTON**  
**CHAIRMAN**

## **Dungannon & South Tyrone Borough Council**

### **Question 1: What are your views on the Socio-Economic Analysis relating to the draft ERDF Competitiveness Programme?**

It has addressed key Socio-Economic factors. The analysis needs to be used to target funding in rural regions to compensate for the decline in agriculture etc.

### **Question 2: What are your views on the Labour Market Analysis relating to the draft ESF Employment Programme?**

Well documented.

### **Question 3: What are your views on the proposed strategy, priority, key areas of expenditure and allocations for the ERDF Competitiveness Programme?**

Priority 1 - 1.1

Council request that DETI allocate funds towards its Innovation/Product Development Centre (on Council lands).

Priority 2- 2.1

Council would request an increase in the allocation for Local Economic Development.

Priority 3.1

Consideration be given to an allocation for Local Authorities to develop Sustainable Energy Projects (Waste 2 Energy).

### **Question 4: What are your views on the proposed strategy, priority, key areas of expenditure and allocations for the ESF Employment Programme?**

DEL should consider that Local Authorities are well placed to develop 'Partnership Models' for Social Economy type initiatives. The increasing role for FE Colleges is to be welcomed. Council are keen to explore funding for migrant population vis a vis - skills/training.

### **Question 5: What are your views on the cross cutting theme for both Programmes of ensuring equality and promoting sustainable development, and creating sustainable communities?**

Promoting 'Good Relations' should be seen as an All-Island and European Union Theme, not an insular approach within N Ireland

### **Question 6: What are your views on the management and implementation arrangements for both Programmes, including the**

**simplified delivery structures, co-ordination arrangements with other Community Programmes and technical assistance proposals?**

It is essential that a Co-ordination Work Group is established for example, joint up Local and Central Government cooperation.

Key Question - How will priority 2- 2.1 complement DARD's Rural Development Programmes?

## **Gingerbread NI**

### **Question 2: What are your views on the Labour Market Analysis relating to the draft ESF Employment Programme?**

Gingerbread welcomes the recognition of lone parents as a priority 1 group. We support the need to reduce the numbers of lone parents and other groups who are economically inactive and to improve the skill and qualification levels of those who are currently employed as well as those seeking to enter the labour market.

Research relating to lone parents and employment commissioned by Gingerbread and carried out by the University of Ulster reveals that while up to 15 per cent of lone parents move into work each year - a rate similar to that of other non-employed people - lone parents have more than double the exit rate of non-lone parents. Low pay, (especially when linked to part-time work) and ill health are highlighted as important contributing factors and evidence suggests that more than 60 per cent of lone parents entering work enter into low paid jobs with poor earnings prospects.

Ill health and disability are obvious barriers to labour market participation in general but for lone parents with no-one to share parenting responsibilities it can make participation in paid work impossible. Nearly one third (32.9%) of lone parents interviewed in the study reported having a disability, or having a child with a disability that would affect their ability to participate in paid work. The level of disability amongst the lone parents interviewed is similar to the population in general in Northern Ireland.

Gingerbread recognises the need for an appraisal of local labour market opportunities and employers' needs so that vocational training provision is informed by work options which match the needs of lone parents in terms of the level of wages and family friendly working. There is considerable evidence that lower educational attainment reduces the likelihood of securing well-paid employment. If lone parents are to stand a better chance of securing good quality, well-paid jobs, there needs to be support for significant up-skilling.

Gingerbread recommends that the new proposed ESF Programme recognises and consolidates the good practice developed through the current BSP programme. The new programme offers a unique opportunity to build on positive outcomes and models of good practice developed during previous programmes. The new programme could offer potential to mainstream successful models and in this way further enhance the support currently available to lone parents and add value to current mainstream programmes such as New Deal for Lone Parents (NDLP) and Pathways to Lone Parents through innovative work focused opportunities and access to higher level qualifications. Lack of work experience serves as a marker of those lone parents who face particular problems in entering or re-entering the labour market. It is essential that longer term support is available. This should include, training, preparing for, finding and staying in work particularly given

the complexity of employability and the level of support needed for the most marginalized.

2.85 refers to the EQUAL programme with regard to innovation and trans-national co-operation however no mention is made of support for innovation and co-operation at local level. Gingerbread recommends that the new ESF programme prioritise successful EQUAL Development Partnerships locally with a view to mainstreaming outcomes, maintaining and developing partnerships and building on achievements.

**Question 4: What are your views on the proposed strategy, priority, key areas of expenditure and allocations for the ESF Employment Programme?**

Gingerbread welcomes the inclusion of support activities to extend employment opportunities, reduce personal barriers to entering employment, and promote fair competition within the labour market. We particularly welcome the inclusion of ongoing training and other support for those who have entered jobs. Research commissioned by Gingerbread and carried out by the University of Ulster reveals that while up to 15 per cent of lone parents move into work each year - a rate similar to that of other non-employed people - lone parents have more than double the exit rate of non-lone parents. We recommend that in-work support be available to lone parents for a period of 12 to 24 months.

Gingerbread is ideally positioned to engage lone parents who are excluded from or at a disadvantage in the labour market through service provision which includes all activities listed at 3.15.

We recommend that the new programme recognise the significance of work carried out under the existing programme and preference is given to successful programmes which demonstrate effective intervention with successful outcomes for lone parents and other client groups in terms of employment and other indicators such as qualifications achieved and increased social inclusion.

Gingerbread welcomes the recognition of outcomes for those experiencing multiple barriers as progress towards labour market entry rather than a job. We also welcome the move to capture soft indicators as a measure of successful intervention and as progress towards the labour market. We also welcome the opportunity to design most effective methods for capturing this information. We recommend that this period of tracking be extended beyond 6 months to 12 or 24 months in order to provide a sufficient period of time to successfully find and move into employment and wherever relevant, capture the exit rate.

2.85 refers to the EQUAL programme with regard to innovation and trans-national co-operation however no mention is made of support for innovation and co-operation at local level. Gingerbread recommends that the new ESF programme prioritise successful development partnerships locally to facilitate the mainstreaming of successful outcomes, maintaining and developing

successful, productive, and innovative partnerships and building on achievements.

Gingerbread acknowledges the inclusion of the trans-national dimension but are concerned to note at 2.89 this activity will be not be a specific priority axis. Given the significance of successful trans-national partnerships and potential mainstreaming outcomes it is recommended that adequate resources are allocated to protect and maintain this important dimension.

**Question 5: What are your views on the cross cutting theme for both Programmes of ensuring equality and promoting sustainable development, and creating sustainable communities?**

The new programmes will help promote equality and remove barriers for those groups more likely to experience disadvantage and remain economically inactive. It is envisaged that the new programme will complement and add value to a number of mainstream programmes and in this way help ensure access to the qualifications, skills and employment. It assists in the achievement of objectives outlined by government in Lifetime Opportunities: Government's Anti -Poverty and Social Inclusion Strategy for NI and DHSSPS Strategy: A Healthier Future, a twenty year vision for Health and Well Being in Northern Ireland 2005 - 2025. These strategies particularly focus on the importance of tackling social inclusion. It is essential that a cross departmental liaison between DEL, DFP and DHSSPS is established to effectively:

1. ensure sustainability of current programmes
2. recognise the success of EQUAL initiatives and create mechanisms within the new programme to mainstream successful outcomes and maintain existing partnerships.
3. address longer-term stability by developing a joint approach to the issue of progressively enhancing match funding and progressing to mainstreaming during the lifetime of the new programme.

**Question 6: What are your views on the management and implementation arrangements for both Programmes, including the simplified delivery structures, co-ordination arrangements with other Community Programmes and technical assistance proposals?**

We note in particular section 18 - the ESF programme - it is proposed that the Department of Employment & Learning will be the accountable Department for all proposed expenditure and should carry out the managing authority functions of the programme.

The current arrangements between the Department of Employment & Learning European Unit and the broader third sector currently work extremely well. There is a high level of professional engagement with the sector enabling a smooth and efficient delivery of the programme. It is important that the assumption of these additional responsibilities does not have a

detrimental impact on the current management arrangements, and sufficient resources are provided to maintain the current high standards.

Additional Points:

1. New programme funding timescales

It is essential that the managing authority recognises the importance of effective funding timescales to allow the efficient delivery against the proposed objectives. 'Positive Steps' (The Government's Response to Investing Together: Report of the Task Force on Resourcing the Voluntary and Community Sector) clearly highlights the importance of having a longer term funding strategy for the sector. It is essential that the managing authorities adopt the recommendations outlined within 'Positive Steps' and at the very least provide the opportunity for 3 year funding under the new programme.