



**Building a Better Future: OFMDFM's
Consultation on the Draft Programme for
Government 2008-2011; Draft Budget
2008-2011; Draft Investment Strategy
2008-2018**

**Disability Action's Response
December 2007**

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INTRODUCTION

- 1** Disability Action is a pioneering Northern Ireland charity working with and for people with disabilities. We work with our members to provide information, training, transport awareness programmes and representation for people regardless of their disability; whether that is a physical, mental, sensory, hidden or learning disability.
- 2** More than one in five (300,000) people in Northern Ireland has a disability and the incidence is higher here than in the rest of the United Kingdom. Over one quarter of all families here are affected.
- 3** As a campaigning body, we work to bring about positive change to the social, economic and cultural life of people with disabilities and consequently our entire community.
- 4** Our network of services is provided via our Headquarters in Belfast and three regional offices in Carrickfergus, Derry and Dungannon.
- 5** Disability Action welcomes the extension of the Disability Discrimination Act 1995 which introduces duties to promote positive attitudes towards disabled people and to encourage the participation of disabled people in public life.

SPECIFIC COMMENTARY

Draft Programme for Government

- 6** Disability Action clearly welcomes the establishment of the Northern Ireland Executive and the production of this Draft Programme for Government, Budget & Investment Strategy. We are however concerned that the draft programme does not contain any analysis of the key issues, the budget document focuses on economic analysis, which although necessary seems unbalanced when compared with the scant social analysis.

- 7 Issues of importance to marginalised groups including the lack of confrontation of intolerance in a divided society, lack of reference to the principles and values of a Shared Future, little reference to equality and human rights, the outworkings of Positive Steps or such key issues as the Strategy for Support Services and funding for the voluntary and community sectors. (Overall)
- 8 This programme spans only 3 years which will only enable the Executive to make a start on delivering its chosen strategic priorities. (Page 3)
- 9 Whilst recognising the urgent need to **“Grow a Dynamic Innovative Economy”** Disability Action believes the Executive must work strenuously to deliver the other 4 strategic priorities and particularly the priority to “promote tolerance, inclusion health and well-being”. (Page 3)
- 10 In relation to the key goals of **“Growing a dynamic Innovative Economy”** Disability Action would make the following points:

Goal 2

- Disabled people are 4 times more likely to be unemployed than non-disabled people this goal needs to reflect this position

Goals 8 - 11

- Disabled people are twice as likely to have no qualifications as their non-disabled peers, these goals must include remedies for this situation (Pages 5 & 6).

- 11 In relation to the key goals of **“Promoting Tolerance, Inclusion, Health and Well-being”** Disability Action would make the following points:

- The Executive must clearly engage the NGO sector in the introduction and delivery of the Employment & Support Allowance to minimise the fears of current benefit recipients and maximise the impact of the policy.

- Whilst the idea of a specialist careers advice service for disabled people is interesting, Disability Action is concerned that there was no reference to this in the recent comprehensive review of employment services for disabled people led by Disability Action and involving a significant number of advocacy and service organisations.

12 Disability Action's key concerns relating to the documents limited commitment to social housing include:

- the capital shortfall of 63% will jeopardise not only the planned start to 13 new supporting housing schemes (180 dwellings) for example for those with intellectual or mental health disabilities but also the in-year programme of 120 new build schemes (1500 dwellings) as carryover commitments already exceed 2008/09 funding.
- the threat to over 4000 adaptations provided directly by the NIHE by housing associations or through specific grant aid to the private sector (Note: Disability Action believes the closure of this grant which is a statutory requirement may be illegal).
- the implementation of 45 major improvement schemes, tackling unfitness/disrepair in the private sector, 18 home/environmental improvement schemes, support for co-ownership and efforts to tackle fuel poverty will all be threatened.
- the estimate that over 3000 construction industry jobs may be negatively affected.
- Government targets to meet the Decent Homes standard by 2010 will now not be met.

Goal 1

- The reduction of child poverty targets are welcome.

Goal 3

- This cannot be achieved in isolation and as there is no evidence that inter-departmental work has been established on this issue, never mind progressed, Disability Action believes this target to be challenging.

Goal 4

- The qualification “**unnecessarily**” is unacceptable and should be removed. In addition the causes of the social exclusion faced by people with intellectual disabilities and those with mental health disabilities are significantly different and cannot be lumped together. Furthermore these individuals require more than “**treatment**” in the community; if they do require intervention that should be based on their human right to choose. A cross-departmental/inter-agency approach must be established to develop a holistic system of support for disabled people living in the community. Such a system must be sustained and obviously requires significant resources (Pages 7-9).

13 In relation to the key priority of **Protecting and Enhancing our Environment and Natural Resources**, Disability Action would make the following points:

- We agree that the natural and built environments are precious assets but regret that the Programme contains no reference to the fact that thousands of Northern Ireland’s citizens who happen to be disabled do not have access to this heritage.
- The overhaul of the planning system must include more stringent conditions to ensure comprehensive access to the newly built environment for people with disabilities (Pages 10 and 11).

14 In relation to the key priority of **Investing to Build our Infrastructure**, Disability Action would make the following points:

- We agree that considerable investment in infrastructure is required. Such investment should focus on areas that will benefit **all** Northern Ireland citizens such as public transport and social and affordable housing rather than roads.
- Telecommunications infrastructure must be made fully accessible to ensure benefit to all Northern Ireland citizens, including those with sensory or communication disabilities.
- It is interesting that the key goals related to this priority focus only on spend and that this is the only priority which is presented in this way. To the reader these investment figures are at such a high level as to be meaningless. For example investing £1.4 billion in social and affordable housing by 2018 really means an average spend of £14 million per year whereas £80 million is required in 2008/09 to meet the social housing new build target. Presenting the information in the latter fashion enables the consultee to better judge the real point being made.

15 In relation to **delivering modern high quality and efficient public services** Disability Action would make the following points:

- we commend the review and reform of public administration and look forward to its conclusion and the consequent review of central government's structures, systems and processes.
- any single telephone number contact point for public services must be accessible to all Northern Ireland citizens including those with sensory and/or communication disabilities and those who do not have English as their first language.
- in relation to goal 5, all website development consolidation and streamlining must meet the best practice in website accessibility. All websites should meet at least AA Level of the W3C Guidelines but preferably AAA in place in 2009. (Pages 14 and 15)

- 16** We note the sections on linkages and delivering priorities but believe that although the PSAs address key cross-cutting issues, there is little evidence to date that any significant and effective inter-departmental work has actually been delivered particularly in the field of social policy and social inclusion. (Pages 16 and 17).

ADDITIONAL COMMENTARY

Children & Young People

- 17** Within these documents it appears that there has been no attempt to mainstream or develop those initiatives established by the Executive Programme Children's Fund, Children & Young People Priority Funding Package and the Supporting Families Package. This situation is of great concern to Disability Action as services for children and young people with disabilities are already significantly under-resourced.
- 18** Disability Action presumes that the Junior Ministers who have already made commitment to establish a Ministerial Sub- Committee on children & Young People will make strenuous representations to the Executive to safeguard existing funding (for children's services), to ring fence monies identified for children's services coming into the Northern Ireland central block and to maximise the potential for new funding for services for children and young people.
- 19** Those DHSSPS service development proposals, especially those proposed by the Bamford Review, **must** be funded. This is particularly the case in relation to children and young people service developments.
- 20** Our more detailed response in relation to children's and young people's issues is included in the response of the Children with Disabilities Strategic Alliance which was founded by Disability Action

DRAFT BUDGET

- 21** In relation to the invitation to comment via the website: www.pfgbudgetni.gov.uk Disability Action would point out that the

government needs to consider the accessibility of this method of responding. A lot of the documents on the website are in PDF format which may not be accessible to disabled people. (Page 3 paras 1.12 – 1.14)

- 22** We believe the not-for-profit section can also make a significant contribution to improving regional productivity. We believe that social enterprises should be referenced in this debate. (Page 4 para 2.4)
- 23** We accept in part the analysis of economic inactivity, this is particularly true in relation to the 18% of Northern Ireland's population who are disabled people and who experience an economic inactivity rate of 64% (Page 14, paras 2.40 and 2.41)
- 24** The references to those on incapacity benefit are bald and are not accompanied by any analyse of cause and possible approaches. This is regrettable as a number of suggestions have already been made in other fora to tackle this important issue. (Page 15, paras 2.40 and 2.47).
- 25** The section on house prices required significant redrafting in light of the recent fall in price. This is of particular importance if as we believe significant income is expected from land sales. (Pages 22 and 23 paras 2.70 and 2.71 and Page 24 para 2.77)
- 26** Another, better example should be used at para 3.35 as the replacement of POCVA, will be charging for this service. (Page 37, para 3.35)
- 27** Disability Action is unable to make informed comment on the section on efficiency gains as the information is not sufficiently detailed to enable us to make appropriate judgements. Information on the high level impact assessments would have assisted this process as would information on the bids submitted to DFP (page 40, para 4.8 – 4.12).
- 28** Whilst recognising the vital need to build Northern Ireland's economy, Disability Action is disappointed that there are no creative, innovative proposals to include support/provision for those who are economically inactive as an integral part of growing our economy (pages 46 and 47, paras 5.1-5.10).

- 29** Funding allocated to DCAL particularly for its key capital projects must only be spent if physical and communications accessibility is fully embedded in the project design and construction (page 60).
- 30** Disability Action welcomes the forthcoming Special Educational Needs Review provided it is not undertaken by the Department of Education in isolation. See also our comments at paragraph 16 above (page 64).
- 31** Disability Action would request more detailed information on the proposed careers advice service, as it is described in the draft Programme for Government as being for disabled people and in the draft Budget it as “including disabled people” (pages 68 and 69).
- 32** In relation to the draft budget allocation to the Department of Health and Social Services and Public Safety, Disability Action would make the following comments.
- We understand that the Department bid for £17m, £29m and £48m respectively for 2008/09, 2009/10 and 2010/11 in relation to the Bamford Review yet received allocations of only £4m, £7m and £11m, sums which may appear large but which will not support the effective and timely implementation of this hugely important review.
 - In this regard we support the submission of the Mental Health Policy Network

- Control over the Budget process gives the Executive the power to rebalance health resourcing which has favoured the acute sector, often causing major damage to the community sector. It is unfortunate that they have not chosen to do so.

33 In relation to the DSD draft budget, Disability Action would make the following comments:

- Plans to start 13 new social housing schemes (180 dwellings) for the most vulnerable (i.e. supported housing schemes such as those for persons with mental health/learning disabilities) are at risk and may not start as planned.
- Efforts to tackle fuel poverty will be set back and work planned for 2,500 public and 5,200 private sector homes via Warm Homes (5000 homes): and, the NIHE Grants Scheme (200 homes) is now at risk.
- Government's target, which is to achieve the Decent Homes standard by 2010, will not be met. At present 21,000 NIHE homes in Northern Ireland do not meet this standard.
- Plans to tackle unfitness/disrepair in 5,300 private sector homes are at risk of not proceeding.
- 120 new build schemes representing over 1500 dwellings are in the published programme for next year, however as carryover commitment (estimated at £65m) already exceeds the funding available for next year (£54.3m), all of these schemes are at risk.
- Of greatest concern is that more than 4,200 households with disabilities may not have adaptations carried out to their homes (950 NIHE; 1770 private sector; 1500 housing associations).

PARTNERSHIP WORKING

34 To ensure effective and efficient partnership working with the voluntary and community sector, the Executive must ensure that the

Programme for Government includes strong and clear targets to effect the full implementation of Positive Steps (the Government response to the Taskforce Report on Resourcing the Voluntary and Community Sectors in Northern Ireland) the DSD Strategy for Support Services and all other high level strategies produced by central government departments.

- 35** Disability Action would welcome greater clarity on OFMDFM's commitments to disabled people and more precise information on how OFMDFM will "improve the lives of people with a disability" (page 105).

36 Disability Action believes that the details of the high level impact assessments should have accompanied these draft documents and still contends that an EQIA should have been conducted and published (page 113).

Annex 1

37 In relation to Annex 1, Disability Action believes the word inclusive should be added to the over-arching aim which should read “a peaceful, just, **inclusive** and prosperous society in Northern Ireland”.

38 Our specific comments on the PSA process and content follow:

PSA 1: Objective 3

- Currently the majority of website and other ICT provision is inaccessible to disabled people. This is a waste of not only a valuable labour resource, but is closing down a market share which has been assessed at UK level of having a value in excess of £50 billion per annum. Consequently we advise that an Action should be added to direct that all e developments are made fully accessible to all and in particular people with disabilities.

PSA 2:

- Objective 2 should contain specific reference to work with those farthest from the labour market in relation to skills development. For example disabled people are, twice as likely to have no qualifications than their non-disabled peers. People who do not have English as their first language, people who are ex-offenders all start from a negative position and this objective and this PSA in general should recognise more than the need to develop literacy and numeracy supports. The PSA should be augmented to reflect the need for more extensive skills development programmes for those further from the labour market. It may be argued that such measures are included in PSA 3, but unless frameworks, systems and processes are changed to recognise need at all levels then provision will never change.

PSA 3:

Objective 1: Targets 2 and 3 have no quantification so percentage targets should be added.

Objective 2: The actions included in this objective are too general and the targets do not seem to fit the actions.

PSA 6:

Objective 1: There appears to be no robust target relating to the Early Years Strategy.

In addition we would propose that a specific action(s) is added relating to the needs of children with disabilities. Our rationale for this proposal is that disabled children can only access general provision for children to a certain level but that their needs are not fully met by generalist provision. Additionally issues that arise for disabled children as they grow to adolescence and young adulthood eg transitions, should also be included in this objective.

PSA 7:

Objective 2: The objective refers specifically to people with physical and sensory disabilities, yet the first action refers more generally to disabled people and the target then reverts to physical/sensory disability. This is not only confusing but devious. If PSA's are cross cutting, the actions and targets relating to disability should not follow the "programme of care" process.

Disability Action believes that references throughout should be to disabled people as a group and not to sub-sections. In relation to the disability specific actions and target we regret that they are not written in a format that enables ease of response.

As the current provision of care packages is already "stressed" in most Health and Social Care Trusts, a target of 20% increase seems generous, but may not be so. On the information available Disability Action is unable to make more informed comment. In addition, there is no reference to the simplicity or complexity of the content of care packages.

Technology and other advances are increasing the numbers of individuals with complex disabilities living in the community, these actions and targets should include this group and their specific needs.

We would outline our concerns about the expectations and presumptions underlying this PSA. Thirteen weeks is far too long a period to wait for something as vital to the individual as a specialist wheelchair. We recognise that the text states that this the "maximum" waiting time, but it is often the case that maximum standards become the norm.

Objective 3: The targets for percentage reductions in numbers in institutions are not adequate. No one, regardless of the

effects of their disability should be living in an institution in the 21st Century.

Objective 4: The shortfall in the social housing budget will have a negative impact on the target to eradicate fuel poverty by 2016.

Objective 5: The outworkings of the PSI Group on Disability deserve recognition and an Action of Implementation of the Report of the PSI Group on disability should be added to this objective.

PSA 8:

Objective 2: Health inequalities are experienced not only within geographical communities but within communities of interest. Disabled people need to be viewed in the widest of contexts, not just in a health context but we would advise that a sole focus on “disadvantaged areas” ignores many disadvantaged communities of interests.

PSA 9:

Objective 2: All developments in digital communication must ensure full access (of both information and communication) for disabled people.

PSA 10:

Objective 3: Disability Action would advise caution in the interpretation of “best value for money” in the delivery of educational services to children and young people with SEN and AEN as such services are often more costly.

PSA 11:

Objective 4: The statutory duty should include duties relating to ethical and inclusive procurement and sub contracting.

PSA 12:

Objective 1: Please see our comments above re the significant shortfalls in the social housing budgets and the knock on effect on Neighbourhood Renewal.

Objective 2: Any policy on architecture and the built environment must ensure the inclusion of the highest standards of physical and ICT accessibility.

Objective 3: Please see our comments at Objective 1 above.

Objective 4: An associated target should be added for action 3 and that target should relate to the comprehensive implementation of Partners for Change.

PSA 18:

Objective 1: The vast majority of the 18% of Northern Ireland's population who are disabled people already live in the community and there are recognised pressures on community care provision. Disability Action believes the target of 45% should be increased to better reflect the needs of the community.

PSA 20:

Objective 4: The introduction of the single telephone number should be paralleled with textphone or a SMS text service to ensure equal access to the service for deaf people and others with communication disabilities. Similar comments apply to web based services

DRAFT INVESTMENT STRATEGY

- 39** Disability Action welcomes the delivery of £5.6 billion of new infrastructure by 2011 and of £18 billion by 2018.
- 40** We welcome the cross-cutting objectives of the Strategy and the use of investment to promote equality of opportunity and the tackling of social disadvantage. However, as with all elements of this draft Programme for Government we believe that an overall EQIA should have been undertaken by this stage and that arrangements should have been made to undertake individual EQIAs of each specific programme.

TRANSPORT

- 41** Disability Action welcomes the commitment to the purchase of new buses and rolling stock and to the modernisation of transport infrastructure. This upgrade proposed in the draft Investment Strategy will improve access to basic public transport services for disabled and older people.
- 42** Disability Action welcomes the proposal to develop a rapid transport system in the Greater Belfast area. The Executive already has a statutory responsibility to ensure accessibility under the Disability Discrimination Act 1995 but often such provision only meets minimum accessibility standards. Disability Action encourages an innovative approach to the development of accessible features in the rapid transit system and as over 70% of disabled people live in the Greater Belfast area, this proposal has the potential to have the greatest influence on the social, political, cultural and economic inclusion of disabled people in Northern Ireland.
- 43** If the draft Investment Strategy is to truly tackle rural poverty, it must address the issue of limited accessible rural transport services. Disability Action expects that commitments contained in the Regional Transportation Strategy in relation to rural demand responsive service pilots to be more efficiently and effectively delivered, preferably on an action research basis.

- 44** Disability Action is disappointed that the Executive has missed another opportunity to offer free travel to disabled people. We believe the situation to be inequitable as:
- Some disabled people (blind people and war disabled pensioners) are eligible and some are not.
 - Northern Ireland is the only region of the UK where disabled people do not have access to free travel
- 45** If individuals wish to challenge the current position Disability Action intends to offer them our practical and sustained support in an effort to address this unequal position.

EQUALITY

- 46** To fully demonstrate its commitment to not only the letter but the spirit of section 75 of the Northern Ireland Act 1998, the Executive must ensure that the detailed spending plans of all departments and their agencies (and NDPB's) are subject to full and robust equality impact assessments and that where adverse impact is identified, mitigating measures developed are creative and effective.

CONCLUSION

- 47** Disability Action has welcomed the opportunity to contribute to this important consultation, we are happy to discuss our commentary or provide further information on request.