

Advice NI Response

Programme for Government

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Programme for Government Advice NI Response

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1. Our children and young people have the best start in life

The Key Priority Areas are:

- Access to Education
- Capability and Resilience
- Care
- Early Years
- Skills and Attainment

Early Years: this point focuses on 'supporting and enabling parents into work with accessible and affordable childcare'. This aspiration does not seem to extend to those parents in receipt of Universal Credit. DfC states on NIdirect: 'Childcare costs will be included in your Universal Credit payments after you have paid the childcare provider and reported the amount you have paid'¹

This process has been found to be discriminatory and unlawful, as ruled by a high court judge². The court ruled that the 'proof of payment' rule disproportionately discriminated against women, who account for about 80% of all universal credit childcare payment claimants³. Aside from discrimination, this requirement seems irrational, as the only reason a claimant can be eligible for UC is to prove they have little or no income.

Universal Credit Regulations (Northern Ireland) 2016 (S.R. 2016 No. 216)⁴: Regulation 2 extends the time which claimants have to report payment of childcare costs, in order for those costs to be taken into account in the childcare costs element when calculating an award of UC. This time extension for reporting is welcome, but does not address the issue of claimants being possibly forced into debt at the exact time they are obliged to claim a means-tested benefit.

DfC could amend the childcare payments system for Universal Credit. UC could consider paying childcare costs directly to the registered childcare provider; in a similar fashion to how it pays registered landlords UC Housing costs directly, instead of the claimant.

This is to ensure parents are appropriately supported and not obliged to pay childcare costs upfront, while claiming UC. This would have a tangible and positive impact for both the

¹ <https://www.nidirect.gov.uk/articles/how-much-universal-credit-you-will-get>

² [https://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/Admin/2021/102.html&query=\(salvato\)](https://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/Admin/2021/102.html&query=(salvato))

³ <https://www.theguardian.com/money/2021/jan/22/uk-childcare-payment-system-discriminatory-and-irrational-high-court-judge-rules>

⁴ <https://www.legislation.gov.uk/nisr/2019/173/made>

claimant and their children, contributing towards the goal of giving children the best start in life.

The Joseph Rowntree Foundation [JRF] suggests that children raised in poverty do less well than children raised in more favourable circumstances. Yet if children are brought up with warm...encouraging parenting, the evidence is clear that they can succeed even in these more adverse circumstances⁵.

There are parenting programmes available in Northern Ireland through Parenting NI. Advice NI suggests that access to these programmes should be made available for all, which contributes towards the goal of giving children the best start in life.

⁵ <https://www.jrf.org.uk/report/what-makes-parenting-programmes-work-disadvantaged-areas>

2. We live and work sustainably – protecting the environment

The Key Priority Areas under this Outcome are:

- **Natural Environment**
- **Green Economy**
- **Built Environment**
- **Housing**
- **Active and Sustainable Transport**
- **Waste Management**
- **Water and Wastewater Management**

This outcome is worth including but might be better phrased “Dealing with the environment emergency – living and working sustainably” in order to fully recognise the magnitude of the situation we are in.

Our natural world is under immediate threat and is facing the sixth mass extinction. The science backing this up is irrefutable and even the most vehement detractors can no longer continue to deny this reality. Without doubt, we are in an emergency situation. And this emergency requires all of us to take immediate actions that match the size and urgency of the problem. While millions of citizens around the world recognise this and are involved in climate activism and protest, political leaders and policy makers are lagging behind and largely seem to be in a business-as-usual mode. The time has come to be honest with ourselves, to face the dangers ahead, and to begin behaving accordingly.

Making incremental changes and reforms, adding the word ‘green’ to our usual activities, playing down the challenges, continuing on the path of continuous economic growth: none of this will prevent the collapse of our civilisation or our natural world. If we genuinely want to protect the environment, as this outcome aspires to, we must make the climate emergency the highest priority. That does not mean ignoring other needs, we can still take care of essential public services such as healthcare, social security, education, necessary utilities and infrastructure, and so on. But everything must be considered through the filter of what is best for the environment. And although tackling the climate emergency requires global action, a lot can be accomplished at a local level too. Political leaders in NI can do a lot if they so desire.

Sustainability, living within our means, has to become one of the guiding principles for decision-making. We need a sustainable economy, we need a sustainable food system, we need a sustainable energy system. Becoming sustainable and taking the climate emergency seriously does not mean there will be no jobs or that our economy has to collapse. Quite the contrary. Our economy will develop and become stronger as we create thousands of jobs in new sustainable sectors to provide for more of our own needs locally.

The key priority areas are adequate although we propose that there are two priorities missing: **a) farming and food production; b) energy provision.**

All of the areas listed here should focus on sustainability, including the two additions suggested. We should prioritise a sustainable natural environment, a sustainable economy, a sustainable built environment and sustainable housing, a sustainable transport system, sustainable waste management, sustainable water and waste water management, sustainable farming and food production, and sustainable and renewable energy provision.

For example, increasing our renewable energy generation will allow us to become carbon neutral and energy independent, resilient and secure. The specific environmental conditions in NI mean that a combination of Wind-Water-Sun (WWS) and sustainable biomass could be applied, *right now*. We have the best wind and wave resources in Europe, as well as great potential for biomass. We have potential to use solar geoengineering which would serve the dual purpose of reducing global warming and generating energy (by way of example see <https://www.meerreflection.com/>). There is potential too to apply marine permaculture i.e. ocean farming of kelp and seaweed. This would sequester carbon, de-acidify our seas, increase biodiversity, and at the same time provide kelp and seaweed that could be used as food, fertiliser and biofuel. All of this work will require us to create more jobs, many of them highly skilled, thus demonstrating the symbiosis that there can be between the economy and transitioning to a post-carbon society – they complement each other, and are not at odds.

Transforming farming and food production, to apply sustainable practices instead of carbon-intensive practise, means we will: better care for our soil and water and reduce pollution; produce more of our own food ourselves rather than depending on imports; grow healthier food with fewer pesticides; reduce meat production and the growth of crops for feeding animals and instead provide a better balance and range of food. Our farmers should be assisted to become sustainable in their practices and to eliminate the use of fossil fuels. Farmers could engage in Regeneration Agriculture, a system of farming and grazing practices that build healthy, biologically-diverse and mineral-rich soils while at the same time, sequestering carbon from the atmosphere (<https://whatsyour2040.com/regenerative-agriculture/>). There is no reason why farmers have to be dependent on fossil fuels to power machinery or fertilise land. Organic waste (including from urban areas) could be converted into energy, fuel and natural compost using anaerobic digestion or composting. Further recommendations about the local production of food are discussed in outcome *‘Our economy is globally competitive, regionally balanced and carbon-neutral’*.

Another example of sustainable living is sustainable waste management. This means viewing waste as a resource, something we can reuse and recycle, instead of disposing of in landfills, incinerators or gasification plants. Organic waste, both domestic and industrial, could be used to generate biofuel, energy and fertiliser through anaerobic digestion and composting. By reusing and recycling waste materials such as glass, plastic, paper, cardboard, metal, electrical and electronic components, we could manufacture many useful products and in the process create more jobs and business.

3. We have an equal and inclusive society where everyone is valued and treated with respect

Advice Services tackle poverty by helping the community to claim benefits they are entitled to. Arguably, women are not currently 'equal' to men in Northern Ireland. The Women's Budget Group stated:

'The Covid-19 pandemic has worsened the situation for many women in terms of health, employment and unpaid work, resulting in increased levels of poverty, debt and mental health deterioration. Violence and financial abuse against women and girls continue to intensify during the local and national lockdowns.⁶

On top of Covid, Welfare Reform has proved unduly punitive towards women, specifically the Benefit Cap and the 2-Child Policy. While these policies remain in place, Northern Ireland cannot be seen as promoting an equal and inclusive society. In order to achieve the Key Priority Area of tackling disadvantage, these policies must be meaningfully reviewed by DfC.

Benefit Cap: In November 2016 the benefit cap thresholds were lowered to £20,000 [couples/households with children] and £13,400 [single, no children] respectively. Official information highlights that at August 2020, 77% (1,440) of the total capped households were single parent households: mostly women. The EQIA states women may have particular barriers to employment and economic participation, in particular lone parent households. The NI Human Rights Commission states:

'Women lose more on average from the direct tax and social security measures than men, mainly because they are more likely to be receiving benefits and tax credits than men. By gender and age group, the biggest average cash losses from the reforms are for women aged 35 to 44 and women aged 75 and over.'⁷

2 Child Policy: This policy restricts entitlement to two children, with UC only furnishing financial aid for a third child if the mother can prove that the third child was conceived by rape.

'Children likely to have been conceived from a non-consensual sexual act. You may get a child element for a third or subsequent child who is likely to have been conceived as a result of a sexual act you did not, or could not, consent to. This includes children conceived around a time when you were suffering from domestic abuse by the other parent of the child.'⁸

CPAG⁹ states the policy is 'extremely likely to contravene human rights treaties to which the UK is a signatory', including those relating to women's reproductive rights and protection

⁶ <https://wbg.org.uk/wp-content/uploads/2021/01/Where-Women-Stand-Ex-sum-V4.pdf>

⁷ https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

⁸ <https://www.nidirect.gov.uk/articles/how-much-universal-credit-you-will-get>

⁹ Child Poverty Action Group

from religious and gender-based discrimination contrary to Article 16 of the Convention on the Elimination of all Forms of Discrimination Against Women. It would also discriminate against groups with a conscientious objection to contraception and abortion, or for whom large families are a central tenet of faith, in breach of Article 14 of the European Convention on Human Rights. Further, it fails to give primary consideration to the best interest of the child in contravention of Article 3(1) of the UN Convention on the Rights of the Child.¹⁰

It is unnerving that a government department requires women to relive [and possibly suffer further] extreme trauma, simply to access benefits to support their family, not to mention the trauma this will potentially cause the children when they become aware that they were the result of a rape and that the social security system has knowledge of that. Jonathan Bradshaw¹¹ points out that no other country outside the UK operates this policy¹². If Northern Ireland is committed to 'tackling inequality and discrimination', this policy must be reviewed by DfC.

The Key Priority Areas under this Outcome are:

- **Inclusion and Tackling Disadvantage**
- **Rights and Equality**
- **Legacy**
- **Tackling Sectarianism, Building Respect and Identity**

Inclusion and Tackling Disadvantage: When looking at this point, the PfG states that welfare and poverty are considerations. The LSE's¹³ new report states the devastating impact of the Covid-19 pandemic on the UK was exacerbated by fault-lines in the welfare state and public services that developed in the previous five years¹⁴.

The most recent poverty statistics, published on 14 May 2020 are for the period April 2018 to March 2019. At that time around 350,000 (19%) people in Northern Ireland lived in relative income poverty (before housing costs) including approximately 107,000 (24%) children¹⁵. Note these figures are pre-lockdown, it is possible they have risen in the wake of redundancies across many industries in N.I.

The 'New Decade New Approach' agreement (January 2020) aims to improve well-being for all by tackling disadvantage and driving economic growth on the basis of objective need.

¹⁰ https://cpag.org.uk/sites/default/files/Two%20child%20limit%20consultation_CPAG%20response.pdf

¹¹ Emeritus Professor of Social Policy, York University

¹² <http://www.social-policy.org.uk/50-for-50/two-child-policy/>

¹³ London School of Economics

¹⁴ <https://www.lse.ac.uk/News/Latest-news-from-LSE/2021/b-Feb-21/Key-fault-lines-in-the-British-welfare-state>

¹⁵ <https://www.communities-ni.gov.uk/articles/poverty>

5-week wait for Universal Credit

Numerous charities and groups object to this feature of UC, including the Joseph Rowntree Foundation, the Work & Pensions Select committee, and Citizens Advice Scotland, who state:

“Our evidence has consistently shown the 5 week wait to be one of the most problematic features of UC. It can cause or exacerbate debt problems, as payment of rent, council tax, utilities and other priority bills may immediately be put at risk, particularly if someone has no savings or has delayed making a claim. It can also leave people struggling to afford food and other essentials. Indeed, clients have had to resort to foodbanks... and high cost credit, such as payday loans, just to get by. Many clients have also reported increased stress and negative impacts on their mental and physical health as a result of the wait.”¹⁶

The 5-week wait was built in to UC to mirror the way employees are paid by employers. It also reduces costs for UC; however it clearly disadvantages the claimant, who must survive without crucial payments, at the exact time they need it the most.

A game-changing action to address disadvantage, and promote rights and equality, would be to investigate the feasibility of running a UBI [Universal Basic Income] pilot. Universal Basic Income is an automatic income for every N.I. citizen. It would provide a minimum amount for every citizen, regardless of means. It aims to provide stability and security for all; reduce the need for means-tested benefits, and mitigate income shocks when a change of circumstance result in a crisis situation.

Advice NI supports the concept of a Universal Basic Income¹⁷; it may sound radical, but these are unprecedented times, and international interest in a Basic Income has been rapidly growing. Advice NI believes a Basic Income could provide tangible assistance as an active 'Social Security' measure, considering the current austere system that does not enable claimants. A UBI could have a positive impact on equality, financial stability, and the nation's mental health. This could also have a positive impact on women, who may have a reduced earning potential following years out of the employment market while pregnant and raising children.

It also feeds in to two of the Outcomes proposed in this PfG; A caring society that supports people throughout their lives; and so Everyone can reach their potential.

A proposal exploring the feasibility of a Recovery UBI has been developed by UBI Lab NI in partnership with Basic Income Northern Ireland (BINI), and adapted from the UBI Lab network's UK wide recovery UBI proposal. It is new, innovative and worth consideration by the Executive. The Northern Irish Universal Basic Income Trials Steering Group is developing a UBI trial in Northern Ireland, and how this proposal can be advanced further via a full

¹⁶ <https://www.cas.org.uk/news/universal-credit-5-week-wait-leads-people-debt-stress-foodbanks-and-ill-health>

¹⁷ <https://www.adviceni.net/content/universal-basic-income>

feasibility study. For further information, contact Ciaran Donaghy, ubilabni@gmail.com, and Patrick Brown Patrick.brown@southdownalliance.org or see <https://www.ubilabnetwork.org/blog/proposing-a-recovery-universal-basic-income-for-northern-ireland>.

Inclusion and Tackling Disadvantage

In 2012 Theresa May introduced the Hostile Environment Policy saying that: "The aim is to create, here in Britain, a really hostile environment for illegal immigrants"¹⁸. The N.I. Executive must implement a more inclusive and fair approach when considering policies, and providing services to the migrant population in Northern Ireland; particularly around work and benefits. To tackle disadvantage, it is vital for The Executive Office to promote access to justice, for those for whom English is not a first language.

Equality NI noted that: 'Migrant workers and new residents experience difficulties in accessing health and social care services.....For example, projects such as STEP... have reported difficulties for those from minority ethnic communities trying to avail of public health provision.'¹⁹

Further to this, employers with 250 or more employees must report on their gender pay gaps, but they do not have to report on their ethnicity pay gaps. Ethnic minority and disabled people's careers are at risk because employers are failing to collect meaningful data on representation in the workforce²⁰. The 2018 Human Rights Commission report, 'Measuring and reporting on disability and ethnicity pay gaps' considers the most effective ways for employers to measure pay and progression for ethnic minorities and disabled people. Advice NI believes that employers reporting ethnicity pay gaps could promote equality for ethnic minorities in the N.I. workforce.

When limited leave to enter is granted to a person to visit, study, work, or join family in N.I, they will have the 'no recourse to public funds' (NRPF) condition imposed. For immigration purposes, the term 'public funds' applies to certain benefits.²¹ In Northern Ireland, there are few support options for individuals with NRPF; they are forced to rely on food banks to survive, but still have rent and other essential bills to pay. The breakdown of a relationship between a couple with international backgrounds can also lead to complex immigration issues, especially when one partner relies on the other's immigration status to remain²².

¹⁸ <https://www.theguardian.com/uk-news/2017/nov/28/hostile-environment-the-hardline-home-office-policy-tearing-families-apart>

¹⁹ Centre for Cross Border Studies et al (2006) Improving Government Service Delivery to Minority Ethnic Groups

²⁰ <https://www.equalityhumanrights.com/en/publication-download/measuring-and-reporting-disability-and-ethnicity-pay-gaps>

²¹ <https://nrpfnetwork.org.uk/information-and-resources/rights-and-entitlements/immigration-status-and-entitlements/overview#guide-sections>

²² <https://www.davidsonmorris.com/remaining-in-uk-after-relationship-breakdown/>

It is vital that individuals with NRPF be supported, with access to free advice services.

EUSS Limits:

The Joint Council for the Welfare of Immigrants²³ is taking legal action to require the Home Secretary to put in place essential safeguards to prevent the EU Settlement Scheme (EUSS) leaving tens of thousands of EU citizens and non-EU family members undocumented after the June deadline for applications. It notes:

“Anyone who is unable to apply by the June 30th cut-off point will lose their legal status and rights overnight and faces detention and removal. People who have lived and worked in the UK for years could face criminal penalties for simply turning up to work the next day.”²⁴

There is a clear lack of ‘promoting access to justice’: many migrants will not be granted settled status, as some weren’t made fully aware of their obligations, regarding how to achieve this.

Hate crimes/Racist bullying:

Official figures were released to show progress on the Executive's Racial Equality Strategy for 2015-25;

- In 2018/19 there were also 1,124 racially-motivated hate incidents and 699 racially-motivated hate crimes reported to the PSNI, an increase on 2013/14 of 976 and 688.
- In 2019, 45% of young people said they had witnessed racist bullying or harassment in their school, up from 39% in 2014²⁵.

The Migrant Centre NI has bi-lingual support workers, who provide services to victims of racist hate crime and incidents, whether they are settled ethnic minorities, migrant workers or asylum seekers and refugees [interpreters are provided²⁶]. Advice NI believes more funding should be provided to support this invaluable work, particularly as it covers the whole of Northern Ireland. There are child-centric counselling services in N.I.²⁷ from a variety of providers, and there should be focus on providing this for the migrant population.

It is vital that the migrant population is not discriminated against; the PfG promotes an approach for ‘ensuring that a person’s background or identity is not a barrier to their participation in society’. Geraldine McGahey [Chief Commissioner of the Equality Commission] stated: ‘It is important that there is full implementation of the Executive's Racial Equality Strategy and this should include a series of outcome-focused actions.’²⁸

²³ <https://www.jcwi.org.uk/>

²⁴ <https://www.jcwi.org.uk/news/jcwi-takes-home-office-to-court-over-eu-settlement-scheme>

²⁵ <https://www.belfasttelegraph.co.uk/news/northern-ireland/stormont-accused-of-failing-ethnic-minorities-as-report-reveals-increase-in-racist-attitudes-in-northern-ireland-40262791.html>

²⁶ <http://migrantcentreni.org/support-victims/>

²⁷ <http://newlifecounselling.net/counselling-for-young-people/>

²⁸ <https://www.belfasttelegraph.co.uk/news/northern-ireland/stormont-accused-of-failing-ethnic-minorities-as-report-reveals-increase-in-racist-attitudes-in-northern-ireland-40262791.html>

While Northern Ireland has made strides reducing sectarian issues, the migrant population face struggles to be treated with the same respect.

4. We all enjoy long, healthy, active lives

The Key Priority Areas under this Outcome are:

- Access to Health
- Inclusion and Tackling Disadvantage
- Mental Health and Wellbeing
- Older People

Advice NI's vision is of a society of confident, informed, and active citizens who can access their rights and entitlements.

Mental Health and Wellbeing:

There is a link between debt and Mental Health. Research shows that 50% of adults who are struggling with debt also have a mental health issue²⁹. It is such a prevalent issue, that the Moneysavingexpert website produced a 44-page PDF booklet supported by Mind, Rethink, CAPUK and others, for people with mental health problems and those caring for them³⁰.

Advice NI ensures access to a comprehensive array of early intervention and support services: Advice NI has an extensive, holistic service for both personal and business debt, utilising safe digi-referrals. We provide free, confidential tailored debt and budgeting advice, solutions to deal with the debt and negotiate with creditors on the client's behalf. We also provide a Specialist Support Service for all Money and Debt Advisers for complex cases and queries. Advice services enables and supports clients to resolve their debt issues, which has a positive impact on the client's finances and therefore overall circumstances.

Older people:

A survey conducted by the Northern Ireland Statistic and Research Agency (NISRA) in 2018, showed that only 35% of those over the age of 65 had accessed a public service online in the previous 12 months. This age group was the lowest proportion using online channels to access public services- such as viewing health records, applying for a driving licences or applying for benefits³¹.

²⁹ <https://www.nationaldebtline.org/fact-sheet-library/debt-and-mental-health-ew/#:~:text=Debt%20and%20mental%20health%201%20Links%20between%20debt,Further%20credit%20and%20spending.%20...%20More%20items...%20>

³⁰ <https://www.moneysavingexpert.com/credit-cards/mental-health-guide/>

³¹ <https://www.belfasttelegraph.co.uk/news/northern-ireland/coronavirus-lack-of-older-people-accessing-public-services-online-concerning-says-charity-39060677.html>

There needs to be a more proactive drive to ensure the opportunity for older people to access services; make a complaint about services; appeal decisions and exercise their rights.

5. Everyone can reach their potential

The Key Priority Areas under this Outcome are:

- **Capability and Resilience**
- **Better Jobs**
- **Skills and Attainment**
- **Sports, Arts and Culture**

Some workers are disproportionately economically impacted by the coronavirus outbreak.

Workers who are from an ethnic minority group, women, young workers, low paid workers and disabled workers, have been most negatively economically impacted by the coronavirus outbreak³².

There is a clear need for upskilling, confidence building and digital skills to help these workers to re-enter the workforce. Resources should be targeted to support re-training, as well as diversifying job opportunities.

Advice NI supports the Jobstart programme, run by DfC, to help young people who are not in work, aged 16 – 24 years, get into the job market by offering six-month job opportunities with a range of employers, in all sectors across Northern Ireland.

As this promotes upskilling and confidence building, Advice NI is keen to develop and expand its volunteering opportunities, and promote traineeships in the advice sector.

‘Better jobs’ and ‘skills and attainment’ can both be developed to ensure they meet the needs of other Outcomes and Key Priority Areas. For example, by having a sustainable economy, generating sustainable energy, and managing waste sustainably, a whole range of new jobs can be created that are more skilled, more secure and better paid.

The skills and training made available should then be designed to cater for these new sectors in our sustainable economy.

³² <https://commonslibrary.parliament.uk/research-briefings/cbp-8898/>

6. Our economy is globally competitive, regionally balanced and carbon-neutral

The Key Priority Areas under this Outcome are:

- **Competing Globally**
- **Green Economy**
- **Growth**
- **Food, Farming and Fishing**
- **Infrastructure**
- **Innovation**

This outcome is at odds with previous outcomes that aspire to tackling our climate emergency and we suggest amending it to read “Our economy should be sustainable, regionally balanced and carbon-neutral”. As discussed already, we have to stop kidding ourselves that we can have economic growth and global competitiveness in a world that is dealing with a climate emergency. The two goals are at odds with each other, they are mutually exclusive. This does not mean, however, that our economy shrinks or collapses. No, it means that we develop new sustainable sectors and create many more jobs as a result, and in fact, we can have a thriving economy.

As for the key priority areas, we should remove ‘competing globally’ and ‘growth’. If we actually want to avert climate disaster, we cannot continue to pursue growth and global competition. It is a nonsense. We might also want to add ‘renewable energy generation’ as a key priority area; and the ‘food, farming and fishing’ priority could be amended to read ‘sustainable food, farming and fishing’.

To achieve carbon-neutrality, and to stop the global temperature rising, we need an economy that operates within the boundaries of our natural resources and that uses them sustainably and as efficiently as possible. Developing a green economy is essential to achieving this. Our goal should be to become more resilient and self-reliant as a region, providing for more of our own needs locally, including our energy and food. By doing so, we can reduce our dependency on fossil fuels and on external markets while simultaneously increasing the number of jobs and businesses created, and providing more security for our farmers.

A sustainable economy will require us to identify ways to transform existing sectors so they are more energy efficient and more energy independent, and to ensure they operate according to sustainable principles.

A sustainable economy will also require us to identify new sectors that reduce emissions, curb global warming, and more effectively use our resources without exploiting them. Examples of potential new / transformed sectors in the sustainable economy include:

1) A waste reuse and recycling industry could be developed. This would create jobs, and reuse the waste materials that are currently being sent to landfill, incinerators, or shipped elsewhere for disposal. Reusing these materials would reduce extractive activities that are highly polluting and would ensure we are making the best use of our natural resources.

2) A food and crop processing industry could be developed around the crops grown through sustainable farming. The goal should be for us to grow as much as possible of all our food needs locally. And it is not just food crops. Farmers could grow crops for purposes other than human or animal consumption, for example, hemp, rapeseed, linseed, willow coppice all of which can be used as the raw materials for a whole range of products. Or they might rear sheep to provide wool for yarn and sheep's wool housing insulation (which would replace existing carbon-based insulation materials). If we were then to establish businesses that could take these raw materials and process them into usable products, then not only would the farmers be guaranteed a market for their crops, but NI would see further job and business creation. None of the above threatens farmers' livelihoods. If anything, it actually secures their livelihoods, and ensures they become part of the climate emergency solution.

3) Our coast has the best wave resources in Europe and we could establish a wave energy sector to generate our own energy, allowing us to become energy secure. Alongside this could be a marine permaculture industry and a solar geoengineering industry, both of which are capable of generating energy, building energy security, and creating more jobs and businesses. See the response to *'We live and work sustainably – protecting the environment'* for more discussion.

4) Another important component of a sustainable economy is having the capacity to finance the new sectors. This can be achieved, not by hoping that the private financial sector will see fit to invest in the new sectors, and not by hoping we will get more money from Westminster, but by having control ourselves of finance and the wealth generated here. We can do this by establishing a Mutual Bank. A Mutual bank is an alternative banking institution that puts its customers and the needs of its local region before profit; and that retains in the region the wealth generated here. By acting as a challenger bank to the high street banks, and operating as a co-operative society, the Mutual will prioritise affordable lending (secured and unsecured loans, overdrafts) to small businesses and business start-ups in the region, especially worker and consumer cooperatives; and will promote economic sectors that add social and environmental value. By helping local businesses in this way, the bank would help create better paid and better quality jobs, and could help increase the resilience and sustainability of the local economy and local communities. The campaign for a Northern Mutual Bank, fully supported by Advice NI, is already up and running in NI using the CSBA banking model that is being used by equivalent campaigns in England and Wales. You can find out more information in the Advice NI briefing paper

https://www.adviceni.net/sites/default/files/publications/advice_ni_mutual_banking_brief

[ing_paper_november_2020.pdf](#)), or by contacting the chair of the FCA-registered Northern Mutual Board, Bob Stronge (bob@adviceni.net).

Innovation:

Advice NI is the leading provider of nationally accredited Advice and Guidance, Legal Advice and Independent Advocacy Qualifications in Northern Ireland. We provide a wide range of courses, endorsed courses and qualifications for supporting the continuous professional development of people working in the advice sector, and throughout the wider voluntary, public and private sectors.

In response to current guidance around stopping the spread of COVID-19, Advice NI has moved its training online for 2021 until further notice. We have a wide variety of content and formats to choose from.

7. Everyone feels safe – we all respect the law and each other

The Key Priority Areas under this Outcome are:

- Access to Justice
- Address Harm and Vulnerability
- Early Intervention and Rehabilitation
- Tackling Sectarianism, Building Respect and Identity

Address Harm and Vulnerability:

Advice NI's values include equality and social justice. Navigating the N.I. Social Security system and achieving a successful outcome can be challenging. A claimant with financial concerns (even without illness) needs to collate extensive and accurate evidence for the claim. This requirement, plus the department's administration, can take time. This is unfortunately exactly when securing financial support is urgent.

This challenge is compounded where the claimant is vulnerable or has complex needs. For whatever reason, the claimants do not have the capacity to complete the application without 3rd party support. Furthermore, explicit consent is now required for all UC claims.

On top of vulnerabilities and consent, Universal Credit is means tested, and is often the sole form of income. A delay therefore, for whatever reason, can have a profoundly negative effect on the claimant. The stakes are high. In February 2020, the National Audit Office published a report on the information held by DWP on benefit claimants who ended their lives by suicide. Our social security system should provide just that: security. It shouldn't be responsible for exacerbating claimants' health problems, or for driving them to suicide. A fit-for-purpose Toolkit could go a long way to addressing these alarming outcomes.

Should the applicant have vulnerabilities, there exists more challenges for them to achieve a successful benefits application. These vulnerabilities are wide-ranging and can include:

Communication:

- Inability to read/write English [as a first or second language]
- Inability to read English [visual impairment]
- Lack of digital literacy [at any age]
- No access to the Internet [particularly relevant as UC is designed to be applied for on-line]

Health:

- Mental Health issues/learning difficulties
- Addiction issues

As these vulnerabilities can impact behaviour, claimants are sometimes non-compliant with the extensive conditionality requirements. This results in sanctions, which is unfair and unduly punitive. The NAO is clear:

“Claimants with more complex needs and circumstances can struggle to engage with the claim process or provide the evidence required, leaving them at greater risk of being paid late. The majority of late payments appear to result from claimants not engaging with the claim process or providing evidence in a timely manner. Stakeholders expressed concern that some vulnerable groups, such as people with learning disabilities, people with chaotic lives and people with low digital skills may find it particularly difficult to make a claim and provide the evidence required³³.

Advice NI published a briefing paper ‘Safeguarding vulnerable Social Security Benefits claimants’ in December 2020. It contains recommendations to improve services for vulnerable claimants.

https://www.adviceni.net/sites/default/files/adni_safeguarding_briefing_paper_december_2020td_2.pdf

³³ <https://www.nao.org.uk/wp-content/uploads/2020/07/Universal-Credit-getting-to-first-payment.pdf>

8. We have a caring society that supports people throughout their lives

The Key Priority Areas under this Outcome are:

- Disability
- Housing
- Inclusion and Tackling Disadvantage
- Mental Health and Wellbeing
- Older People

Disability and Inclusion: In order to achieve a caring society that supports people, there needs to be a less bureaucratic and more financially generous Social Security system, plus a more robust/resilient independent advice sector.

The majority of enquires supported by the welfare changes service delivered by the independent advice network supports people with disabilities. Often this is in the form of assistance with Personal Independence Payment applications and assisting people to challenge decisions [Mandatory Reconsiderations and appeals].

Equally, advisers support people with Employment & Support Allowance applications, Mandatory Reconsiderations and appeals. The service additionally supports the carers of disabled people as their circumstances can be affected by the decisions made in relation to the social security benefits of the disabled person. When vulnerable claimants and their carers can receive free, independent advice, this supports positive mental health and overall wellbeing [Key Priority Area].

Any Key Priorities missing?

A securely funded independent advice sector: Independent advice services are crucial to delivering a caring society.

Advice NI is a membership organisation that exists to provide leadership, representation and support for independent advice organisations to facilitate the delivery of high quality, sustainable advice services. Advice NI exists to provide its members with the capacity and tools to ensure effective advice services delivery.

This includes: advice and information management systems, funding and planning, quality assurance support, delivery of accredited and non-accredited training, social policy co-ordination and ICT development.

Membership of Advice NI is available to organisations that provide significant advice and information services to the public. The advice offered by members can be generalist advice, as well as specialist and targeted advice, on a range of issues including social security

benefits, personal and business debt, tax and tax credits, and immigration. In 2019/20, Advice NI and the independent advice network dealt with 540,983 enquiries.

The independent advice network deals with some of the most vulnerable and disadvantaged people.. The Independent Advice Network worked with DfC regarding its Covid19 response, including running the Covid19 Community Helpline and providing support at the frontline. The Executive wants to know who can help deliver real and lasting improvements across all areas proposed in this PfG:

To help poverty-stricken, disabled and vulnerable clients secure money they are entitled to, advisers do so by:

- Providing benefit entitlement checks and income maximisation for clients
- Identifying, prioritising and explaining to clients their options
- Providing quality assured, jargon free advice and support
- Facilitating form completion on behalf of vulnerable clients
- Advocating on behalf of clients
- Providing relevant onward referrals (including crisis intervention)
- Providing a holistic approach
- Positively impacting clients and their families' overall health and financial well-being

Longer-term Funding contracts: To deal with enquiries, the independent advice network employs generalist and specialist advisers. Despite the expertise of the practitioner, many advisers are obliged to accept fixed-term contracts from their employer. Fixed-term contracts are perhaps more commonly used in the charity sector than any other sector due to the funding environment within which charities are positioned. Generally, the intended benefit... is to enable employers to more easily terminate the employment of those employees if funding is terminated and / or not renewed³⁴.

Fixed-term contracts are often used by the employer as the funding for these roles are short-term, and the charities/organisations have insufficient reserves to allow them to offer advisers a more secure, long-term position.

While this approach can be seen as logical self-preservation by charities, it does impose an awareness on the adviser that this role is temporary; which can potentially have a negative effect on morale, staff turnover, and consequentially, an interruption to the continuity of care for clients.

In order to deliver a caring society that supports people, advisers themselves need to be supported, through more secure and long-term funding for their roles.

³⁴ <https://elliswhittam.com/blog/fixed-term-contracts-for-charities/#:~:text=Fixed-term%20contracts%20are%20perhaps%20more%20commonly%20used%20in,the%20funding%20environment%20within%20which%20charities%20are%20positioned.>

9. People want to live, work and visit here

The Key Priority Areas under this Outcome are:

- **Competing Globally**
- **Better Jobs**
- **Growth**
- **Housing**
- **Tackling Sectarianism, Building Respect and Identity**
- **Sports, Arts and Culture**
- **Planning**

We do not need to be globally competitive or pursue the wrong-headed goal of continuous economic growth to be a place that people want to live and work in. With a sustainable economy that both protects our environment and creates jobs and businesses, we can have a thriving region capable of providing its people with work and with a safe and secure place to live.

See the response to '*We live and work sustainably – protecting the environment*' for comments regarding the priorities for 'competing globally' and 'growth'.

See the response to 'Everyone can reach their potential' for comments regarding 'better jobs'.

Any further comments in relation to this consultation?

DfC needs to commit to investment of time, tangible/financial resources and meaningfully engage with interested groups to co-design policy; in order to implement game-changing actions and secure a lasting, positive change to Northern Ireland society.

It is fully expected that the demand for independent advice services will continue to increase both in (2021/22) and beyond due to:

- Increased job loss: (The number of people on the NI claimant count was 58,400 in December 2020, almost double the number recorded in March 2020);
- Furlough ending at end of April 2021 (98,499 on furlough in NI, Dec 2020);
- Increase in Universal Credit applications (114,000 households on Universal Credit, August 2020);
- Future migration of benefit claimants on to Universal Credit & Planned cuts to the UC £20 per week 'Covid19 increase';
- Social security benefit appeals (5,958 PIP appeals pending).

Independent advice services are crucial, to support N.I. society moving forward in the wake of Covid. For the reasons outlined above, it is essential that funding cycles become multi-year as opposed to annual.



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