

**The Committee on the Administration of Justice (CAJ)
45/47 Donegall Street, Belfast BT1 2FG
Tel: (01232) 232394 Fax: (01232) 246706**



Winner of the Council of Europe Human Rights Prize

CAJ's commentary on

**Vision into Practice -
New TSN Action Plans**

February 2000

**Submission No. S.98
Price: £2.50**

**Submission No. S.98
Price: £2.50**

Contents page

General Introduction & commentary on introductory report chapters	page 1
General comments on all departmental plans	page 4
DANI	page 7
DED	page 9
DENI	page 14
DoE	page 16
DFP	page 19
DHSS	page 20
NIO	page 23

Vision into Practice - New TSN Action Plans

Commentary by the Committee on the Administration of Justice (February 2000)

General Introduction

The Committee on the Administration of Justice (CAJ) is a cross community voluntary organisation which has worked since its inception in 1981 on a wide array of human rights concerns. The organisation takes no position on the constitutional status of Northern Ireland, but monitors the extent to which the jurisdiction is administered in accordance with international human rights norms. Alongside its work on more directly conflict-related issues such as emergency legislation, prisoners and policing, the organisation also works on issues of equality, gender, disability, racism, and juvenile justice.

As a human rights organisation, CAJ is concerned amongst other things to monitor the state's compliance with its obligations to protect the economic, social and cultural rights of all, and to ensure that the state treats people equally and in a non-discriminatory manner. It is this interest and expertise that CAJ seeks to bring to the debate around the New Targeting Social Need debate. We should note at the outset, therefore, that we have little expert knowledge in all of the different fields under consideration - agriculture, housing, health, education, etc. - and accordingly we have not sought to comment in detail on all of the issues raised. Our focus in studying the TSN Action Plans is to assess to what extent the government's objectives and proposals might effectively tackle issues of poverty and reduce the inequalities which divide society. While this is clearly not the only question that government departments have to measure their plans against, we believe that the creation of a fairer society for all is a central goal, and we hope that our comments will make a constructive contribution to achieving that goal.

We would like to start on a positive note. While in the following pages our commentary will sometimes be quite critical, both in terms of process and of substance, we very much welcome the publication of the Action Plans as draft documents, and the attempt to consult affected constituencies. A government commitment to Targeting Social Need was first announced as long ago as 1991 by Peter Brooke, and we welcome any initiative aimed at operationalising this important commitment in a meaningful way. Government can hardly have a more important task than to reduce poverty and social exclusion. We all hope that the production of these draft Action Plans will start a process which succeeds in harnessing the work of public bodies and of civil society to work together towards this important objective.

CAJ comments on the introductory chapters

While noting that comments have only been actively sought with regard to the specific departmental plans (6.2.4), we had a number of comments on the preceding material:

1. In the Secretary of State's introductory preface reference is made to the importance of helping **disadvantaged children and young people** so that they have the best possible start in life. We endorse this objective wholeheartedly and note that it exemplifies why government decided that "employment and employability" should be a priority, but not the sole priority of the New Targeting Social Need programme. While welcoming the fact that the White Paper (Partnership for Equality) especially highlighted employment when differentiating between "old TSN" and "new TSN", it is important also to recognise explicitly (as did the White Paper¹) that new TSN will have to go beyond that world. We note this here because there are a few points in the text where the employment objective seems to be emphasised to the exclusion of other issues.

2. 2.1.2 - The point made above would be further emphasised by giving the example of "**ethnic minorities**" when talking about exclusion, since most people from ethnic minority communities see their exclusion as different to (if sometimes also additional to) the exclusion created by poverty.

3. 2.3.1 - it is not clear why it is thought that "resources and efforts **may** need to be directed towards those who are most disadvantaged"? Surely the point of the announcement of the new TSN priority is that they **should** be so targeted?

4. 2.5.1 - CAJ supports those arguing for additional resources to be allocated to TSN-directed programmes, and in some parts of the following text we question whether the proposed objectives can be met without additional resourcing. At the same time, CAJ recognises the particular value of re-assessing **all** current expenditure in the context of the new TSN priority - particularly if additional resources are not forthcoming in the immediate future. We were, however, uncertain about the proposal that departments might opt to "set aside part of a programme budget to provide additional assistance to those in greatest need". This seems to run counter to the opening of the paragraph which indicates that "there is no special fund set aside for (TSN)". People will want to know if there are any "ring-fenced" TSN monies, and this statement seems ambiguous.

5. 2.7.1 - In our comments on the DED Action Plan, CAJ expresses a number of concerns about the decision to move to a totally different method of assessing TSN than that used by other departments. We are unconvinced that this is either necessary or wise. However, if it is decided to proceed this way, it will be vital over the course of the Action Plans to evaluate the various approaches to identifying those in greatest social need. There will need to be a close monitoring of any problems created for cross-departmental targeting of multiple deprivation and an assessment made as to which indicators are better than others.

¹ "Obtaining work is often, indeed, the most effective way to counter the effects of social disadvantage on unemployed people and their families. However, some forms of inequality and need must be targeted more directly and would not be adequately addressed by a strategy which dealt solely with unemployment". (p 29 of Partnership for Equality)

6. 2.9.3 - CAJ agrees that there is no incompatibility between TSN and the statutory duty to promote equality of opportunity. Indeed, we would go further and say that, in effect, TSN is the statutory duty in operation! However, we believe that the Action Plans are surprisingly silent about the relationship between the two concepts, and indeed the statutory duty is rarely mentioned in the document. We comment on this at several stages in the following paper, but we would urge that the two issues should run through the whole document as a recurring theme.

7. 4.1.1 - We assume that relatively few people in government are from ethnic minorities, are Travellers, or have directly experienced the problems of teenage parenthood. Accordingly, we welcomed the inclusion of such know-how in several of the PSI and other working groups. We found the use of the term "as appropriate", when referring to external participation, somewhat unsatisfactory since it suggests such "outside" involvement might be the exception rather than the rule. CAJ believes that the involvement of people in decisions affecting their lives is of vital importance, both to ending their social exclusion, and to improving the decision making process itself. Of course, the statutory duty now exists to make the involvement of affected groups a legal obligation on the public sector.

8. 5.2.1 - If external consultants are to be used regularly in reviewing departmental plans, it would be important for the CCRU (or its successor body) to ascertain that the external consultants themselves are sensitive to and informed of the needs of those likely to benefit from TSN and PSI initiatives. They must have the requisite training and expertise to act as effective "challenge agents" in the internal planning process.

9. 6.1.1 - We welcome the references to the contributions that are of particular value in this consultative process. CAJ however attended the Belfast consultative seminar and noted that few "people affected by social need" and few "voluntary organisations working with or representing disadvantaged people" seemed to be present. Indeed, some organisations obviously falling into this category seemed to have been unaware of the seminar and/or had not received copies of the draft Action Plans to comment upon. A key message from that seminar was the importance of consultation with the affected groups. Clearly outreach to those in greatest social need is the most difficult outreach of all, and it is unlikely to be perfect from the first attempt.

However, in terms of learning from this time around, CAJ believes that:

- If one is to hold meetings in Belfast and Derry it is illogical to give them different agendas. People are most likely to go to the venue nearest them, and it seems counter-productive to send a whole group of people from Belfast to Derry or vice-versa because their interest in health, or education, or whatever is being dealt with in the "other" venue

- Such seminars (early on in the consultative process, when few people have seen the actual document and clearly have not had a chance to discuss it in any detail) should be clearly billed as information sessions.

- It is worth considering afresh whether the best option is to produce books costing £10 (and that heavily subsidised)? This made it near to impossible for the relevant target group to engage in the process on anything like an equal footing with large groups and organisations. Would a simpler exercise at a much earlier stage in the process have made effective participation more likely?
- The public bodies involved in consultative processes must show more understanding of the need (and, as of now, the legal requirement) to consult effectively with affected groups.
 - Little distinction appears to have been made between this consultation exercise - the conclusions of which would affect large numbers of very marginalised people - and consultation on an issue likely to be of peripheral interest to a highly specialised group of people.
 - It is unclear what initiatives were taken to reach out especially to groups and people knowledgeable about unemployment, Travellers, lone parents, the elderly etc. all groups that are likely to be disproportionately represented amongst the poor and socially excluded
 - Given that the deadlines have been extended, it seems that the initial deadlines were not necessitated by some external time constraints (eg so as to inform the Programme for Government). However, if this had been the case, an explanation of such time constraints would have gone a long way to assuaging concerns, and eliciting more effective cooperation.

On a small technical point - it is unwise to wait until page 26 to notify the reader of the (initial) deadline for comment. This crucial information should be highlighted more obviously - in the cover letter, and at key points in the text.

- There ought also to be some awareness shown that the process of consultation has at least three objectives. Firstly, in and of itself, the process of involving people in decisions affecting their lives contributes to a lessening of their social exclusion. Secondly, involving the real "experts" in issues of unemployment, the health concerns of Travellers, the exclusion of women etc. (that is, people who are unemployed, Travellers, women) will better inform and therefore improve the decisions taken. Thirdly, a good consultation process will create a shared sense of ownership of the eventual outcome. All of this requires a fundamental organisational culture change for policy-makers. They must be front-loaded into the decision making process - investing time and resources into getting better decisions taken - rather than in compensating for mistakes after the event. One might say that the single most important contribution that one could make to the objective of Targeting Social Need is to make the poor and the socially excluded the agents of their own change - an effective consultation process can begin to do just that.

General comments on the departmental plans

In the following pages, we comment on the specific objectives and proposals of each department in turn but, having read all the departmental reports, there are a number of more general comments that apply to all of them.

1. We think that it is unfortunate that each departmental plan did not start with some, albeit brief, description of the particular problems they believe they must tackle in the coming planning period. Thus, at present, the texts read more like a managerial planning exercise than a genuine response to problems on the ground. It would make the whole process more "real" if some account was given as to why Targeting Social Need - whether in the realm of health, education, agriculture or whatever - was still a necessary priority for government, and the particular challenges facing Northern Ireland in all these respective areas. It would also provide some benchmarks against which change could be measured at the end of the planning period.
2. This question of benchmarks is a particularly important one. It was disappointing that the targets set were, in the great majority of instances, extremely vague. For example, why can't some figures be set as to the decrease we would like to see in Traveller infant mortality, the number of children leaving school without any educational qualification, the number of women killed as a result of domestic violence, and the unemployment differential - to give just some examples? Without such targets, how will we know whether social need was effectively targeted and what should be done in future planning periods? The DSS in Britain has drawn up such "indicators of success", so we believe the setting of clear targets is a very feasible objective to be set.
3. CAJ welcomes very much the commitment to developing baseline data. This step is crucial to effective TSN planning and will be vital to monitoring the statutory duty also. However, this commitment is not referred to systematically across the specific departmental Action Plans, and we feel that some more thought will have to go into the coordination of the work of the TSN Statistical Sub-Group with the plans of the individual departments.
4. More generally, there was some good practice in several departmental plans which was not consistently replicated across all the plans. So, for example, DED 1 addressed the issue of securing top-level commitment; DHSS 22 gave a good overview of the issue of training; DENI 2 and 3 addressed the need for baseline data; and DENI 4 and 6 handled well the issue of possible policy conflicts. DENI 20-26 and DHSS 3-4 dealt with the issue of outcomes and measures. and NIO 6 talked of the department's responsibility to address the TSN imperative when influencing the policy of groups they were funding. It may be valuable in the final drafts to take some of these "best practice" proposals across all the plans, and replicate them in each of the individual departmental action plans.
5. While this draft report was prepared prior to the entry into force of the statutory duty to promote equality of opportunity, we were surprised at the limited awareness which the report exhibits of the implications of this new duty. In future, departments will have to collect and analyse baseline data on a range of social groups to comply with the new duty. This task is neither something that should be being only "actively considered" years after it was recommended (see our comments on the DANI plan), nor something which only applies to community differentials (see comments on this in response to

several departmental plans). Issues of gender were particularly noticeable by their absence - as if the needs of women were exactly the same as those of men when it comes to issues of social exclusion, social need, employability etc.

6. We endorse several of the concerns raised in NICVA's early commentary on the Action Plans. It is inappropriate to consult on programmes that are to be completed in the very near future (and some in fact were to end even before the consultation period expired). It is inappropriate to include in a **New TSN** plan, programmes that have been underway for some time, without at least some explanation of this fact. Last but not least, the plans are meant to cover three years, yet most of the targets relate to very early in the three-year phase, rather than being spread over the whole cycle. CAJ would certainly endorse the value of people having access to some of the basic research data on which government departments are making their assessments. While supplying this material to large numbers of groups and organisations would presumably be prohibitively expensive, there are ways in which it could be made more accessible and, in so doing, assist those consulted to make more informed contributions. We certainly do not understand why publicly-funded research material should be denied, as appears to have been the case, when NICVA asked to have sight of a key consultancy study.

7. The last general concern of this kind that we should raise here relates to overall expenditure priorities. We raise the issue in our comments on the action plans of the Department of Health and Social Services, because it has been suggested to CAJ that initial expenditure allocations to the various Boards are insufficiently sensitive to the principle of social need. However, the question has wider resonance and affects all departmental decision-making. It is clear that, if Targeting Social Need is to work, decisions about mainstream expenditure priorities must be skewed very deliberately to targeting social need, yet it is not often clear from the draft Action Plans how those key early funding decisions are taken. So, for example, in the monies set aside for a particular programme (childcare, rural development, reducing GP waiting lists etc), it is insufficient for the plans themselves to be explicit about the need to focus on areas and people in greatest need. It is vital also that it is clear how, and on what criteria, decisions will be taken as between these respective priorities. It is clearly nonsensical for people to comment on the various "ancillary" programmes of a department, if the fundamental decisions are already taken as to funding priorities. It would be very welcome if the DFP could clarify how it intends through the draft Programme for Government (or whatever other appropriate mechanisms exist) to skew funding priorities to social need as a whole.

Department of Agriculture

1. **Paragraphs 2 and 5:** reference is made to the EU and UK-wide constraints on DANI's ability to pursue new TSN policies. No reference is made to the potential that DANI presumably has to push new TSN in these very places. After all PAFT and TSN were specifically written into the European Peace and Reconciliation Programme for Northern Ireland thanks to bottom-up lobbying to this effect.

At the UK-wide level, it is our understanding that targeting social need and preventing social exclusion are UK-wide governmental policies, though the operationalisation of the policies may vary in the different jurisdictions. Accordingly, where UK-wide agricultural policies seem to run counter to DANI's new TSN plans, this is surely worthy of challenge at the Westminster end? "Joined-up government", a concern of the current government, would seem to require some consistency as between local and UK-wide policies, and certainly cannot work if contradictory policies are being pursued.

The debate at the EU level must presumably be pushed by the UK government, but recent press coverage of visits to Brussels by NI's Minister of Agriculture highlight that policy-making can be a two-way street. Given the nature of new TSN we believe that there should be little opposition in principle to the concept at the European level, though we recognise that there may be technical difficulties which need to be addressed in ensuring harmony at the NI, UK and EU levels.

2. **Paragraph 4:** It is right that DANI refers to the geographical, topographical and environmental criteria which will need to be studied alongside concerns around Targeting Social Need. The beauty of the Targeting Social Need programme is that monies not be disbursed in some random way across the whole of NI, nor that every person/farm/locality get exactly the same allocation. Fishing will, of necessity, be concentrated at seacoasts and near rivers; hill farming is not viable on the plains etc. However, the "added value" of the TSN programme is to assess where the monies are going and to assess if it is being properly targeted for the best return to the socially disadvantaged. SACHR in their 1996 research found, for example, that payments to hill farmers were on a downward trend, despite the fact that these are largely funded out of European funds. Have the reasons for this been determined, and remedial action taken as necessary?
3. **Paragraph 7:** Given the remarks above, the promised review of the HLCA, and the review of the assessment criteria for environmental schemes, are a most welcome indication of DANI's intention to integrate New TSN concerns across its work programme. While somewhat surprising that this is happening so long after the TSN priority was introduced, perhaps the re-focusing of the TSN programme will embed it more effectively than was previously the case.
4. **Paragraph 8:** The commitment to the Rural Development Programme is also welcome. However, there is quite a gap between the rhetoric and the reality here, if one looks at DANI's proposals on expenditures under the European

Structural Funds. As part of a small working group with a variety of women's groups, CAJ met with ministers and senior civil servants to discuss the lack of any serious gender perspective in various departmental proposals on the ESF. This is all the more surprising in that European guidelines on the inclusion and mainstreaming of women's concerns are very detailed, and NI proposals that do not meet these criteria are likely to be unsuccessful. In fact, we understand that the initial plans have been returned by Europe for further work, and that one of the queries was in fact the extent to which they had targeted exclusion.

We can sum up the concerns regarding DANI's initial plans for European funding as follows: the limited reference to rural community-based activities, the lack of proposals promoting community led regeneration in rural areas, the omission of any reference to community arts and cultural activities in rural areas etc. These reflections are very relevant to the New TSN action plans since it is fairly widely recognised that women's employability in rural areas will not be enhanced by an emphasis on agri-business. However, pro-active targeting of rural community development work would, apart from tackling social exclusion directly, create an employment sector which is more likely to suit the needs of women in rural areas.

5. **DANI 6:** No reference is made as to what will happen to hill farmers if the Commission is not amenable to DANI's arguments. Is it intended that other monies will be diverted to those in greatest need?

6. **DANI 9:** Asking questions about community background is apparently "under active consideration". However, in the 1996 SACHR report, reference is made to a 1993 CCRU report which said that "the system of grant support and aid to the farming community should be monitored to determine its fairness and its impact upon the two main sides of the community". However, SACHR went on to say that "The 1994 CCRU report noted that the DANI had strongly opposed options for introducing the gathering of information on religious affiliation and implied that only a 'Ministerial steer' would produce action. Such a steer has, presumably, not been forthcoming since in their response to this research, DANI argued that, given the difficulties of altering the focus of agricultural policies (that is, parity) religious monitoring would be of limited benefit". Given that religious monitoring appears to have been under consideration by DANI for some six or seven years, one must wonder what significance to invest in the fact that it is now "actively" considering the issue? Moreover, it is not clear what steps are being taken by DANI to monitor on grounds other than community.

7. **DANI 10:** reference is made to reviewing schemes against baselines - does this imply that the baseline data has already been collated, or should reference be made to its collection in one of the earlier targets, or is this what is referred to in DANI 13?

8. **DANI 14 and 16:** In both of these objectives, it is worth making a particular point about disability. It is important that there is an emphasis on awareness raising around disability issues both for staff, and in terms of setting objectives more geared to the needs of people with disabilities. In that context, one must be cautious about the weight placed on monitoring the users of facilities and on visitors surveys (19). There will have to be deliberate outreach to those who do not use the services because they know - or believe - that the facilities will not be accessible to them.
9. **DANI 19:** Given the earlier remarks about women in the rural environment, it may be worth emphasising here that departments will have to "equality proof" as well as "poverty proof" their policies (i.e. comply with the statutory duty to promote equality of opportunity as well as Target Social Need) and that these objectives should seek to reach out to a whole variety of disadvantaged groups - women, people with disabilities, people from socio-economically deprived communities..
10. **DANI 22 -** This proposal to use TSN in determining the needs for baseline data and to determine future research priorities is both very important and welcome.

Department of Economic Development

1. **Paragraph 3.1 and others:** The Plan proposes responding to the problem of high unemployment by focusing largely on local (District Council and Ward) area initiatives, and specific issues facing disabled people. A geographical emphasis may address the religious/political differential, but is not likely to tackle the unemployment level of women, those with disabilities, or minority ethnic communities. The response from the DED to the needs of New TSN needs also to incorporate a more complex position that considers the impact of multiple disadvantage e.g. women from minority ethnic communities, or those from the Catholic community who are disabled and long term unemployed. Only in this way will departments integrate the statutory duty to promote equality of opportunity with their responsibility to target social need.
2. **Paragraph 5.1:** It is vital that the monitoring of the plan and its outcomes is based on an agreed monitoring format that can be cross-referenced with the monitoring of other departments and the data from the 2001 Census. One problem is the failure for the DED to state that it will monitor by ethnic status. Failure to do so will ensure that minority ethnic groups and others needs cannot be adequately measured and responded to, and the plans fail to meet the requirements of section 75 of the Northern Ireland Act.

3. **Paragraph 6.1:** CAJ is concerned for several reasons at the decision of DED to move from the Robson indicators to the "unemployed claimant count". Firstly, this decision will have major implications for many parts of Northern Ireland, and it is not clear why this appears not to have been made a matter for wider consultation. Secondly, while we are aware of the criticisms made of Robson, we are not at all sure that replacing a complex multi-criteria assessment measure with one single measure of social need is wise. Thirdly, it is our understanding that New TSN places a focus on employment and employability but it clearly recognises that there are many and multiple forms of disadvantage which require addressing. People from ethnic minority communities and people with disabilities are not necessarily found amongst the unemployed but they are often in great social need - so employment should not be the sole criterion of need measured. Fourthly, women who may be unemployed are nevertheless normally under-represented in the claimant returns, so why is this method of measuring unemployment being chosen? The change being proposed could well ensure less rather than more priority is given to women's disadvantage and exclusion in future. Fifthly, allowing departments to develop different measures of social need will surely make it impossible to monitor progress across a range of indicators and programme areas. So, even if the number of unemployed claimants in ward X drops, will one be able to monitor health and education changes in the same area, or will one find that those programmes have had their resources skewed away to other regions completely?

So while accepting the weaknesses of relying solely on the Robson Indicators, we think that the advice in Central Secretariat Circular 2/98 on this matter is most helpful. The Circular informs Departments to use the Robson indices but says that they should be used to establish a baseline only. It importantly states that other relevant sources may be used. In such cases where the information from the 1991 census is not adequate e.g. for minority ethnic communities, other sources should be used. These could include research reports such as *Out of the Shadows/ Speaking Out*, or could be based on further research. The agreed way forward should be developed in consultation with the various constituencies that may be affected by the operation of New TSN.

5. **Paragraph 6.4** The DED should consider how to link the offering of enhanced levels of assistance to companies locating in designated Council areas to the recruitment of long term unemployed people. Will the legislative changes allowing more localised recruitment be of assistance here? The NI Affairs Committee urged that it was not enough merely to site industry in deprived areas, but that decisions about the location of industry (and (re)training programmes) should be specifically geared to reducing the unemployment differential. The government did not challenge this suggestion, and it would be good to indicate how this is to work; will it be, as suggested, in the context of preparing the department's Equality Scheme?
6. **Paragraph 7.2** The Draft Plan recognises that policies should be aimed at individuals as well as at locations. This is welcome but there may be additional factors that affect the proportion of different communities seeking employment in certain sectors of employment or in particular companies. This is not just limited to religious denomination but also includes the fact that

women tend to be over-represented in certain sectors and underrepresented in others. In addition about 90% of Chinese people are employed in the catering trade and few, if any, Travellers are employed outside of self-employment or the Traveller representation organisations.

Thus there is a need for the DED to address the spread of employment available to wide sections of the community and the processes to encourage diversity in the work place which will assist in the social inclusion and social integration of the wider community. The promotion of positive action measures, allowable under the different pieces of equality legislation, will be a very useful tool. The DED should undertake to forge closer co-operation and inter agency work between its different operations and the Equality Commission for Northern Ireland, which could advise (amongst other things) on positive action measures. The coming into force of the statutory duty to promote equality of opportunity will necessitate moves in this direction. However, it is important to note that taking measures in this arena are not merely external legal obligations, but they would assist in the creation of a positive environment and this, in turn, would be seen as an advantage/attraction to inward investors.

7. **Paragraph 8.2** The draft recognises the involvement of 3000 employers in New Deal. It is welcome that the draft plan highlights the importance of the development of private sector involvement in enabling the long-term unemployed to avail of new opportunities, though it is vital to emphasise how this programme will be skewed to New TSN areas and groups. The NI Affairs Committee specifically requested that the New Deal be monitored by religion for its effects in reducing the unemployment differential. With the statutory duty, the programme will have to be monitored across a range of constituencies, and government recognises that fact in its response to the NI Affairs Committee. This is not specifically alluded to in the department's Action Plan.

8. **Paragraph 8.3** Local economic development should include the development of local community employment initiatives, which are particularly important in disadvantaged areas. The department should consider how it could best support and develop such initiatives including co-operatives and local trading schemes/companies. The DED should also ensure that not only are local communities involved in the economic development of their area but also feed into the process that is New TSN so as to ensure their voices are collectively heard.

It is noticeable that throughout the departmental action plans there is little sign of a genuinely dynamic approach to community involvement with an exploration of how one builds up community involvement and dialogue. However, this is a particularly noticeable omission in the DED action plan since the social economy could and should be seen as such a vibrant sector of the NI economy.

9. **DED 1-2:** This appears to be a good approach in terms of quarterly reporting, training etc, and it is one for other departments to follow.
10. **DED 4 b:** Other monitoring data e.g. ethnic origin/racial group, sexual orientation etc. should be included so as to comply with S75 NI Act 1998.
11. **DED 5:** Given the fact that "community differentials" is normally taken to mean the religious/political communal divide, it would be worth noting that research should also be undertaken into other differentials, across a range of constituencies and areas of employment. To undertake this effectively, the department would need to involve a variety of representative groups in the research programme.
12. **DED 9-10:** The department should also monitor those who leave scheme, the reasons for this, and comparative figures as between New Deal in TSN and New TSN areas. This latter comparative analysis applies across other objectives also.
13. **DED 11-13:** The objectives are good but it is often not clear how this might be done. One concrete example that springs to mind is the value of employing key advisors to work with particular sections of the community who experience particular difficulties in gaining employment e.g. minority ethnic communities including Irish Travellers, people with disabilities, and those with other particular social needs including homeless young people.
14. **DED 14:** The department should include in this programme of work the need to monitor the take-up rates (again, also as between TSN and non TSN areas), and monitor and take action to ensure that at least 50% of those Worktrack participants in New TSN targeted areas secure employment.
15. **DED 15:** There needs to be a system for working closely with communities to ensure the involvement and success of lifelong learning. If the targets are to be achieved particular consideration will have to be given to ensuring effective access by people with disabilities, and those whose first language is not English.
16. **DED 17:** We presume that "equitable" means a fair reflection of the levels of need across all new TSN areas, rather than an "evenly balanced" distribution which ignores need? The latter would be quite unacceptable, especially in a plan about Targeting Social Need.
17. **DED 18:** People with disabilities in the scheme should be monitored on basis of age, gender, community background, race etc.
18. **DED 20:** It is CAJ's understanding that the "Ulster Supported Employment Ltd" is sponsored by the T&EA and has as its core activity the establishment

of segregated sheltered workshop provision. We are not sure how this is seen as part of the Targeting Social Need programme?

19. **DED 21-23:** This does not specifically refer to the need to target new TSN areas and trainees meeting TSN criteria, but presumably this is the intent? There should also be an explicit recognition of the needs of non-geographically concentrated but socially excluded groups such as minority ethnic communities. Targets should be set for the inclusion of minority ethnic communities in initiatives such as this.
20. **DED 28:** This objective of encouraging foreign investment into TSN areas has been somewhat criticised in the past, since there seemed to be no parallel encouragement for companies to recruit locally. The programme should develop mechanisms to avoid subsidising companies which financially benefit from locating in or adjacent to a TSN area, but which make no economic or employment contribution to the area. See also above for recommendations from the NI Affairs Committee that such initiatives be measured against their capacity to reduce the unemployment differential.
21. **DED 30 a:** Is 10% an optimum proportion or should this be more ambitious? Alternatively, has consideration been given to making a higher rate of help available to those companies who recruit higher proportions of long term unemployed people.
22. **DED 32-33:** These are important objectives and the IDB and LEDU should be in regular communication with the Equality Commission to agree joint action in targeting New TSN area based companies and in developing policies for the inclusion of underrepresented groups through measures such as positive action. Clear targets and timetables could be set in this regard.
23. **DED 37:** The IDB should specifically target one of these community businesses to be established each year for minority ethnic communities. Given the excellent research report "Out in the Country" which addressed the Traveller economy, the IDB has important research data to draw upon, at least with regard to Irish Travellers, who have a long history of self-reliance and have skills in areas such as recycling.
24. **DED 38:** Many people with disabilities are attracted to self-employment and specific resources and support should be directed to support such initiatives.
25. **DED 43-44:** Restricting the survey to postcode areas assumes that the community background will be the sole criterion for determining need, when there are constituencies of need (people with disabilities, ethnic minorities etc) which cannot always be identified by postcode details.
26. **DED 49-50:** DED should consider how to best target resources at low income households who may benefit from New TSN and whose outgoing can be

minimised through renewable energy schemes and how those in those areas could be best employed in such schemes. These objectives should make it clear that the Energy Trust Fund is to be targeted at those in most need; we understand that this may not be the priority currently.

Department of Education

1. **Paragraph 3:** DENI comments on the fact that it has been "top-slicing" 5% of its annual budget since 1993-1994 but does not mention that this was criticised by the NI Affairs Committee in 1997 when studying "Under achievement in NI secondary schools". In reporting this fact, SACHR's major 1998 report into the operation of TSN noted the NI Committee's belief that "the allocation of 5% to TSN was merely old money with a new name". SACHR went on to say that "Moreover a 5% top slicing does not begin to address the disparity between, for example, the notional 'cost' of a student from the highest and lowest social class, public spending on the former being about 64% higher than that on their poorer counterpart". There are many examples in the SACHR report of funding decisions which are not effectively targeting need², and indeed of some practices which contribute to increasing inequalities in educational provision. While disappointingly little reference is made explicitly to these problems in the text, several proposed objectives will allow for a thorough overhaul of all the department's current policies and procedures (see for example DENI 4a).
2. **Paragraph 6:** Is "Making a Good Start" targeted at either areas or pupils in social need? We understand that it is not, and if this is the case it is misleading to comment on it in this way. Can/should it be re-formulated to allow for a skewing of resources to those in greatest social need?

3. **DENI 1-6:** The objectives and timescales in this section are all most welcome. The focus on the gathering of baseline data (DENI 2) and the review of policy (and especially potential policy conflicts) is particularly welcome.
4. **DENI 8-11:** These are all welcome objectives but suggest that additional resources may be required. At the very least, this work should be undertaken with a view to preparing for ministers a better analysis of real needs on the ground if the objectives established are in fact to be achieved. This may require close cooperation with other departments. CAJ understands that the Sure Start Programme is only being extended to NI in April this year (see

² In one example cited, the then funding procedures led to Methodist College, where less than 1.5% of the enrolled students qualified for free meals, receiving £10,276 of TSN funds. Elsewhere Grosvenor (with 93 'free school meal' students) received no such monies, but St Michaels, in Lurgan, with 91 such students, received £25,975 TSN funding (p.173).

reference in the DHSS plan), and already serious concerns have been expressed as to the insufficient level of funding being allocated to this important programme. Certainly, it is widely accepted that the greatest single contribution which can be made to improved education for all our young people is support for the most disadvantaged at the earliest possible age, which is the very purpose of the Sure Start Programme.

5. **DENI 12:** This puts forward some good ideas but some questions arise. Firstly, the timescale for the Information Communication Technology measures (2002) seem quite long, especially as major ICT initiatives are currently underway in schools. Secondly, given that those most disadvantaged are less likely to have easy access to ICT hardware and the range of software at home, measures to make such access easier in schools would be vital.
6. **DENI 13:** It would seem imperative that new TSN criteria are introduced with regard to capital priorities & this would presumably apply to both major and minor capital works? What is the thinking behind "considering the feasibility" of this measure?
7. **DENI 14-16** are all welcome though one must ask why the monitoring processes suggested in DENI 15g and 15h are only to be introduced in 2002? Also it would be helpful if it were indicated (15h) why pupils from ethnic minority backgrounds are being picked out here - is the idea that other disadvantaged groups will be similarly monitored even if over a longer timeframe?
8. **DENI 17:** CAJ was unclear as to what this objective meant. Would it, for example, include reviewing the practice of selective education at 11 years of age?
9. **DENI 18:** This is a good example of the kind of procedural problem that the SACHR research highlighted and this objective is to be welcomed (as is 19)
10. **DENI 20-26:** CAJ felt that these objectives showed an excellent sense of how one could operationalise new TSN in a specific sector of work. We in fact wondered if this model should not be more frequently replicated in other departmental plans?
11. **DENI 27-28:** Our only slight hesitation with regard to these targets is that a reader might think that community relations problems are assumed to be more acute in schools in socially disadvantaged areas. There is, to our knowledge, no clear evidential basis to support this. Unless there is such a clear rationale, one needs to be careful about what would constitute the most appropriate skewing of resources. Perhaps the department should commit itself to work with local communities to assess need in this sector, if it has not already been done? It would certainly be worthwhile to study how the nature

of, and/or the response to, community relations problems varies depending on the socio-economic environment, since this could then inform future priority setting.

12. **DENI 29:** It is clear that TSN has not been widely promoted in the area of higher and further education until now. It is particularly important that 29d is operationalised effectively and does not remain a vague aspiration.
13. **DENI 30-31:** Why is there no mention of a review of the current arrangements for both student fees and maintenance grants in the light of new TSN? And why is there to be an embedding of TSN objectives within the FE funding mechanism but no similar commitment regarding HE? Studying NICVA comments on this segment one must wonder if it is simply because TSN criteria have "been on the go for several years" in further education. However, if this is the case, the objective as currently framed denotes nothing new, and is disappointingly not accompanied by any commitment to rectify omissions in the higher education field.
14. **DENI 32-33:** These targets are to be warmly welcomed

Department of the Environment

1. The DOE makes some very positive commitments to objectives to be realised within six months (e.g. DOE 29, 46). Several projects however, sound vague and are without mention of a time-frame (e.g. DOE 10 and 25d). In particular, while there is frequent mention of partnerships, strategic alliances and the like, there is little detail on the development or operation of same.
2. CAJ welcomes a number of the clear commitments made in the Action Plans. For example TSN impact assessments of policy are to be incorporated more systematically than before (see DOE 28 - land-use, and DOE 35 - roads). There is frequent mention made of undertaking reviews, establishing baselines, agreeing performance indicators, monitoring, and publishing annual reports on new TSN.
3. However, we do have concerns at the lack of specific reference to the impact of the statutory equality duty which is bound to raise important policy issues for the department (see recent disputes over housing in the North Belfast area, and persistent concerns around Traveller provision). Neither is there reference to the Equality Commission and the relationship the Department will need to develop with it in ensuring that it targets need effectively.

4. We felt that in some of the targets set it might have been better to formulate commitments and assessments in terms of percentage changes rather than in raw figures.
5. **Paragraphs 4.3-4.5:** The importance of housing is acknowledged insofar as “decent housing helps to promote social well-being and cohesion”. The provision of proper housing is in fact also a basic human right which is part of government’s international commitments (under the Council of Europe's Social Charter, and the UN's International Covenant on Economic, Social and Cultural Rights). Although it is good to see that the numbers of people in urgent housing need has decreased, the time period of eighteen years is a long one, and it is very disappointing to see how many are still in urgent need.

6. **DOE 3c** is worth quoting to illustrate the importance of plain English in government publications. “To nurture strategic alliances to create a viable city centre together with creative delivery mechanisms in collaborative approaches that systematically link the city centre.” This is incomprehensible to the average reader. By contrast, the objectives set for the regeneration strategy in the north west are much clearer and more specific.
7. **DOE 9:** While in principle one would normally welcome any proposal to concentrate more attention on the needs of Travellers, there is also a sense in which Traveller needs have already been sufficiently analysed and researched. The problem seems to be not so much in determining what the needs are, but in ensuring that the resources are in fact effectively directed at responding to those needs. Presumably this work will be done in close consultation with members of the Traveller community? This is one particular area of work where one could and should set very clear and measureable targets.
8. **DOE 11:** The clear and specific time-limits are welcome here.
9. **DOE 12-14:** It is interesting to note the commitment to distribute funding through the District Partnership Boards on the basis of TSN. This is in fact only possible because local lobbying ensured that the disciplines of PAFT and TSN were written into the European guidelines, and this is a positive lesson for the future about the positive impact local policy making can have on European funding programmes. However, it was not clear from the comments about District Partnerships as to the extent to which these structures are seen to have been effective in targeting social need - this may only be clear once the consultants' evaluation is completed? To the extent that they have been successful, it would be vital to build on those positive experiences and diversify the ways in which Partnerships are encouraged to address poverty in their locality. Their work, in other words, should be more effectively "mainstreamed" rather than seen as peripheral and totally dependent on the continuation of special discrete European funding.

10. **DOE 16:** Was there any discussion as to why the Laganside Corporation did not already have a TSN Action Plan, given the fact that New TSN is a re-direction of energies not an entirely new initiative? And given this fact, is the deadline of a year ahead ambitious enough?
11. **DOE 18:** This is one of the instances where numbers, as well as percentages, would have been helpful for the reader to understand the level of demand. Indeed, in order to monitor improvements in current arrangements over time, it would also be necessary to have some indication of what the current response rate is. Thus, it would be necessary to know if the response rate is currently 10% or 90% to assess whether a commitment to a 95% response rate appeared sufficiently realistic. Alternatively, should the emphasis be on reducing the time-scale involved?
12. **DOE 22b:** The completion of four pilot accommodation projects is to be welcomed, but it would have been useful to mention the numbers that would be accommodated, and confirm the degree to which the project is being undertaken in consultation with members of the Traveller community. In the absence of more statistical data about the overall level of need and of response, it is difficult to judge whether this is a major attack on the serious deprivation suffered by Travellers, or a largely tokenistic measure.
13. **DOE 22-4:** It would have been useful to mention the total number of 'social housing' estates. – how many and what percentage of the total are already deemed “run down”.
14. **DOE 25:** The issue of fuel poverty is clearly an area where TSN can make a very significant impact, but only if the issue is clearly defined and strategically addressed. CAJ welcomes plans to address energy inefficiency, but several of these objectives do not indicate that they will be specifically targeted at need. Moreover, the reference to selected pilot schemes seems to reflect more current programmes within the Department than any strategic assessment of need. For example, no reference is made to the particular energy efficiency needs of rural areas, where the problem is different to, and often worse than, that faced in urban areas.
15. **DOE 28-30** very appropriately commit the government to a TSN impact assessment of development plans, policies and advice and are very welcome.
16. **DOE 32:** The capacity-study of previously developed sites is positive; presumably this too will be undertaken with a view to redeveloping areas most in social need.
17. **DOE 40:** Public transport facilities (or lack of them) is an issue for a wide range of people, for example for people with disabilities. This is a good example of somewhere in the text where a clear reference ought to have been made both to TSN and to the new statutory duty.

18. **DOE 41** – The review of the formula for Council funding to take account of socio-economic disadvantage is a positive move, though it is not clear if this was not done previously (TSN has of course been part of government policy since 1991), or it is intended to be a re-assessment of past policies to ensure that they are achieving what they set out to achieve - ie target social need effectively.

19. **DOE 44:** This objective and the targets set to achieve it seemed very vague. Surely the DOE's Environmental and Heritage Service offer a lot of potential in terms of employment, services, and outreach work which would be of benefit to the most economically disadvantaged?

20. **DOE 46:** It was very refreshing to read such a frank and courageous objective as “changing the departmental culture”. TSN will not be effective unless all staff are fully trained, motivated, and regularly assessed in terms of their commitment to departmental objectives. It would be useful to include some more specific targets or actions in this regard.

Department of Finance and Personnel

1. **Paragraphs 3 and 5:** It is our understanding that CCRU has moved to the Office of the First and Deputy First Minister as the new Equality Unit. This is welcome since it gives a clear signal of the central importance which local government wishes to accord to the equality agenda and to the objective of targeting social need. We are, however, unclear as to what extent, if any, some TSN responsibilities will also stay with the DFP? The DFP is the lead department in all financial and funding debates and it seems therefore important that there should be some continuing DFP portfolio so that the TSN agenda is pursued actively within its own department, and in its discussions with other departments. We would be grateful for some clarification on this point.

In fact, given the move of the CCRU into the Equality Unit in the Office of the First and Deputy First Minister, it is unclear if any of the objectives DFP 1-15 apply any longer. Indeed, it is unclear if NISRA is providing the research capacity within the DFP still, or whether that also will be moving out. If the latter were the case only eight of the 28 objectives would remain under the DFP umbrella. The rest of this commentary will therefore concentrate on the objectives of the Central Finance Group.

2. **DFP 21:** This is an important objective and highlights the lead-role that the DFP should still be expected to play even if the TSN Unit is moved out to the Office of the First and Deputy First Minister.

4. **DFP 22:** Given our concerns about the fact that different departments may be using different indices of deprivation, has the DFP considered how it will develop "more precise new TSN expenditure definitions"? Is it confident that, despite different departmental approaches, it will be able to track inter-departmental programmes and assist in assessing their contribution to the TSN priority? There was even a suggestion in the DED approach that the "unemployed claimant count" was being used because of the delay in being able to rely on appropriate Robson Index data (which will only be updated after 2001). Does this suggest that departments will use different baseline data every few years; will this not make the monitoring process totally unwieldy? Is NISRA aware of and supportive of this flexibility in data gathering; and if not should the approach be reconsidered?

In general terms, it was surprising that under this rubric particularly, there was so little reference to the statutory duty to promote equality of opportunity (the reference to the issue in DFP 15 is quite insufficient). It is vital that all the data-gathering tools (especially the 2001 Census) are being geared to gathering appropriate data to assist public bodies comply with their duties in this matter? We would like some assurance that this is in fact underway.

Department of Health and Social Services

CAJ understands that, since this report was drafted, the creation of additional departments had brought about important changes in the DHSS with, for example, the Voluntary Activity Unit moving to the Department of Social Development. It has been suggested to us that this transfer of staffing and programme was made without a simultaneous transfer of financial resources. If this is the case, it would seem to risk undermining in a very serious and damaging way many important initiatives in the area of community development. For the purposes of Targeting Social Need, any undermining of the area of community development is likely to be very problematic. We would appreciate any clarification of this issue that can be given.

1. **DHSS 1:** Demonstrating a top level commitment to new TSN must include ensuring that the overall resources have been allocated, and continue to be allocated, on the basis of need. It is not clear to us from this report how these determinations are made and who makes them; what monitoring systems are in place; and what measures can be taken to rectify any funding problems that arise. It is our understanding, for example, that the initial funding allocations as between different Board and Trust areas are quite different, and are not necessarily determined by the level of social need in the respective areas. If key funding allocation decisions like this are not skewed at the outset, any other TSN initiatives will be largely irrelevant (this issue is raised in general terms in our introductory comments)

2. **DHSS 3:** This is a welcome objective and the targets and actions are more detailed than elsewhere, though more could probably be done. By way of example, we mentioned in the introduction the importance of very specific and measurable targets, and gave the example of government indicating the reduction in infant mortality in the Traveller community it sought in the coming period.

It was not always clear how the desired outcomes meshed with the targets set. So, for example, it is excellent that the Department wants to ensure greater involvement of local people in decision-making, but it was not always clear to the reader how this was to be pursued in the specific targets. One might imagine inserting "in consultation with local/affected constituencies" in several of the targets. Indeed, 3g moves from sounding quite abstract and aspirational, to being more concrete and measurable, if specific reference is made to working with the groups at risk to ensure that they receive the support they need. It is not clear from this, or other objectives, where the necessary baseline data derives from. Thus if one is to work to prevent domestic violence, how reliable is current data on the level, nature and causes of the problem. Without a solid statistical basis of this kind, it will be difficult if not impossible to measure change.

3. **DHSS 4:** Childcare needs to be consistently targeted at those in most need and most of the targets suggest that this will be done. But this objective is not referred to specifically in (f) and (g), and while an information system does not necessarily have to be targeted at particular users, it is not clear why para (g) does not make specific reference to those in need.
4. **DHSS 5-6:** It is perhaps surprising that there is very little reference to children's needs per se, other than as dependants of adults (childcare) or as teenage parents. Somewhere (though it is not necessarily only in this departmental plan) it would be good to make some reference to the need to comply with international human rights law with regard to children and keep their "best interests" always to the fore of all decision making. Issues around participation are also fundamental (and promoted under international law) but are not mentioned specifically in objective 6. In fact the difficulties inherent in effectively consulting children and young people highlight the need for resourcing the welcome objective which commits the department to local empowerment.
5. **DHSS 9:** The "stability of the HSS Board allocation formula for populations of varying sizes" deserves particular attention, given the point about mainstream funding above. What are the allocation formula, and is population size the only criterion, or one of many? We understand that the "impact of the Troubles" was seen as an important measure in determining the likely health needs in any area, and we wonder if this has had any impact on the allocation formula? Certainly it is inconceivable if government intends to target need effectively that the allocation formula not be reviewed with a view to the level of social need in any particular Board area.

6. **DHSS 10:** Presumably this "equity monitoring system" is the response to the obligation on public bodies to monitor the delivery of equality of opportunity and data will be being collected across a range of social categories? As raised in the response to other departmental plans, it is strange that this appears to only now be happening when TSN has in fact existed since 1991, and PAFT since 1994, and there is no justification given for waiting until March 2002. Nor is it clear why the target is restricted to the "utilisation of, and access to services". Surely the department's Equality Scheme will have to review a whole range of policies to determine whether they are promoting, or undermining, greater equality of opportunity?
7. **DHSS 11:** The programme of research appears to be being agreed internally. Will there be an opportunity for local community and public involvement in advising upon and determining the priorities here?
8. **DHSS 16:** Why are (a) - GP practice lists - and (b) - capitation based methodology - considered to be Targeting Social Need? They seem to be specifically untargeted.
9. **DHSS 18:** Surely the whole point of TSN and New TSN is to skew resources to those in need, so it is not clear why one would wait until February 2001 to agree procedures for linking resource decisions to needs assessment?
10. **DHSS 19:** the general section seems to cover "social care needs" as well as healthcare, but there is no reference to such needs in the list of inequalities to be tackled by HSS Boards (see 19c)
11. **DHSS 20:** See comments on the fair skewing of resources earlier.
12. **DHSS 21:** There is a lot of welcome emphasis here on community development and community involvement but it will be important to monitor closely that statutory responsibilities are not being 'delegated' to volunteer bodies with insufficient training and resources.
13. **DHSS 22:** Is there sufficient data already (and if not should research be commissioned) to assess access to discretionary funding and take-up rates across the various equality constituencies (race, gender, religion etc.)?
14. **DHSS 26:** It is surprising that, given that the Social Security Agency will play such a major role in any programme aimed at targeting social need, only one objective is proposed. CAJ believes that there needs to be a comprehensive review of the current services and programmes to ensure that they target need effectively. The November 1999 report from NIACAB highlights particular problems of access, but there are also issues around the question of the Agency's "duty of care" which need to be addressed.

14. **DHSS 27:** There is also the issue of assessing the current location of health services, and future planning in this realm, so that it is responsive to the need to promote a TSN and equality of opportunity approach.

Northern Ireland Office

1. **Paragraph One:** The wording "rights and identities of all traditions in NI" is not taken directly from the Good Friday Agreement to our knowledge but may have been used on the assumption that TSN is essentially directed at rectifying communal inequalities. While this is one of the objectives of TSN, it clearly addresses issues of socio-economic disadvantage, regardless of the "tradition" one belongs to, or indeed whether or not one belongs to a clearly recognisable tradition at all - eg people with disabilities, the elderly etc.
2. **Paragraph 2 and 3:** In the same vein, although it may be correct that many NIO functions are not going to be very directly impacted by the TSN priority, they will be impacted by the statutory duty to promote equality of opportunity, and the two policies overlap to a considerable degree. Accordingly, it will be vital that the various bodies outlined in paragraph 3 gather baseline data and monitor their activities to ensure that they are in fact promoting equality of opportunity. The Promoting Social Inclusion objective of government would require bodies like the NIO and its constituent elements to give consideration to its treatment of ethnic minorities, Travellers, teenage parents etc.
3. **Paragraph 5:** The Compensation Agency may have a statutory responsibility to provide compensation, but it will be required under section 75 of the NI Act to monitor who it is working with. This may, in turn, highlight some policy issues which require addressing.

4. **NIO 3:** We understand, and welcome, the importance of providing training in TSN for the Executive and for Assembly members, since this programme, in tandem with the equality agenda, is to be a central plank of government policy. We do not however see why the NIO would be responsible for training political parties per se - what is the thinking here? No information is given about how this training might happen and we would recommend, as we do elsewhere in the report, that the skills and know how of bodies outside the public service be more effectively drawn down. Training in race awareness, disability, etc. are all best provided by the sectors concerned rather than by public servants. The composition of the public service is not fully representative of the society it serves, and accordingly, it is particularly important to draw on the talents of people and groups outside public service to remedy these deficiencies.
5. **NIO 4:** Is there a clear definition as to what constitutes "victims of the Troubles" in this objective? For example, would this include funding groups that work generally with children and young people (who have known nothing

other than conflict), prisoners and ex-prisoners, victims of state violence, injured security force members, or is it any of these categories that are not actively catered for under other funding rubrics? What is the specific link to the objective of Targeting Social Need - are "victims" (however defined) to be considered as in social need, or is it those victims who are socio-economically deprived who will have resources specifically skewed to their needs. If the latter, this is not clear.

6. **NIO 5:** All public bodies are meant to have been pursuing a TSN programme since the early 1990s, and new TSN is merely a re-emphasising and re-tooling of what went before. Given this, why do the Probation Board and Compensation Agency need until January 2001 to prepare their plans?
7. **NIO 6:** It is good (but not we think replicated in any other departmental plans?) that the department is notifying the groups it funds of TSN as best practice and encouraging them to act in accordance with the principle to the extent possible. At the same time, nothing is said about the funding priorities of the NIO vis-à-vis voluntary organisations and the priority that should be given to those groups working with the most socio-economically disadvantaged.
8. **NIO 8:** This will be a very useful mapping exercise. It will also be important to build in some indices which capture how the criminal justice system deals with "blue collar" and "white collar" crime; what the levels of policing are in different areas; and the socio-economic profile of the victims and the perpetrators of juvenile and other crime. Serious consideration will have to be given to the findings of such research since if close correlations are made between socio-economic indices and crime, the answer may well not be additional policing resources to the area, but rather in increased housing/educational/leisure provision to the communities concerned.
9. **NIO 9e:** The Patten Commission recommended that stop and search activity be much more closely recorded and there are many ways in which English (and presumably other forces) do this when dealing with racial monitoring. It seems to us highly unlikely that BT postcodes as a proxy indicator will be a sufficient response, and in any event section 75 means that the police should look beyond religious and political categorisations.
10. No reference is made in the objectives to the findings of the soon-to-be-published Criminal Justice Review. This, as did the Patten report, is likely to raise questions about the representative composition of all those operating the criminal justice service. The review may also pose questions as to the extent to which the whole service is accessible to and responsive to the needs of those in socio-economically deprived communities in Northern Ireland. The NIO will need to review its TSN plans in the light of these two major studies.
