



**Response to the Department of Employment and Learning's
Consultation on Pathways to Success -**

**Establishing an initial broad strategic direction and supporting
cross- Departmental actions to reduce the number of young people
most at risk of remaining outside education, employment or
training (NEET)**

SUMMARY DOCUMENT

July 2011

This document contains the Executive Summary and Recommendations from Include Youth's comprehensive response to DEL's consultation on Pathways to Success.

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Executive Summary

Introduction

1. Include Youth is an independent NGO that has been in existence since 1979. The organisation promotes the rights and best interests of and best practice with young people in need or at risk. We undertake activities aimed at influencing public policy and policy awareness in the areas of youth justice and education, employment and training of young people. Include Youth works directly with young people to support them to be engaged with policy decision making processes and to improve their employability. We produce resources and provide training, information and support to practitioners and organisations.

Include Youth's Give and Take Scheme aims to improve the employability and increase the self esteem of young people in need or at risk from across Northern Ireland. The Scheme works with approximately 135 young people from a care or criminal justice background. The Scheme aims to support young people to overcome particular barriers that prevent them from moving into mainstream training or employment and towards independent living.

General Comments

3. Include Youth welcomes the opportunity to respond to this consultation by the Department for Employment and Learning (hereafter DEL) on 'Pathways to Success'. The issue of young people not in education, training or employment is one of the main policy priorities for the organisation and as such is one we have a considerable amount of expertise and learning which we are keen to share in our response.
4. This submission is informed by evidence from published and unpublished research, relevant international human rights standards and guidance, critical policy analysis, extensive practitioner based experience within and beyond Include Youth and the views of young people from Include Youth and other organisations.
5. Include Youth welcomes the recognition of the issue of young people who are not in education, employment or training as a high priority for the Northern Ireland Executive and as such it will be vital that the Pathways to Success implementation is explicitly referenced in the forthcoming Programme for Government and associated Departmental Business plans.

6. The cross departmental nature of the proposed Strategy is vital to its success and therefore extremely positive. While a number of government departments have a contribution to make Include Youth would envisage the Department of Education as taking a particular lead role alongside DEL in the delivery of this Strategy.
7. In relation to Section 75 it would appear that DEL has only examined the potential impact of its Strategy on the age ground. DEL appears to have overlooked the fact that young people have multiple identities and the potential for adverse impact that the application and implementation of the Strategy may have on other Section 75 grounds. Include Youth recommends that DEL carries out a full and comprehensive screening process and an EQIA of its Pathways to Success Strategy.
8. Include Youth was surprised to find no reference to relevant human rights standards within the consultation document. The proposed Strategy would benefit from the enumeration of a set of underpinning principles based on international human rights standards. Such principles would make it clear that government is adopting a human rights based approach to addressing the issue of NEETs.

Strategic Focus

9. A major weakness of the consultation document is its failure to provide any analysis of the wider historical, social, economic, political or cultural context within which the Strategy is being developed and how it influences the proposals contained within it. The conflict and its legacy have created and/or sustained, in part or many of the underlying reasons for young people becoming NEETs as well as determining many of the key characteristics of our economy.
10. The absence of any discussion or analysis of either the local or wider economic context, beyond a passing reference to the impact of the global economic difficulties on levels of youth unemployment, is difficult to understand in the context of a Strategy that aims to reduce youth unemployment. Include Youth recommends that the Strategy include a detailed analysis of the likely impact on the government's scope to create/sustain youth employment of a range of both micro and macro economic factors including public sector cuts, the welfare reform agenda, increasing privatisation of services and the downward push on wages.
11. While the consultation document recognises that all sectors, including employers and businesses, have a role to play in tackling the issues affecting young people who are NEET, the document does not include any plans for high level engagement with

employers. Include Youth would strongly recommend that the strategy includes a specific focus on employers. The increasing difficulties in securing work placements for young people also underscores the pressing need for a concerted, high level approach to engaging with employers.

12. Disappointingly, despite being a cross-departmental Strategy, the consultation document does not convey a sense of inter-connectedness or alignment with other high level strategies. The Pathways to Success Strategy needs to be much more clearly aligned with a number of other key strategies, most notably the ten year Children and Young People's Strategy, the Care Matters Strategy and the Northern Ireland Suicide Prevention Strategy and Action Plan.
13. In addition to the lack of coherence **across** Departmental Strategies there would appear to exist a lack of an integrated, co-ordinated policy response **within** DEL - the effective exclusion of the core group of young people who are NEET, the majority of whom are below NQF Level 2, from the Success through Skills Strategy 2 is hugely concerning and must be addressed within the context of the development of the Pathways to Success Strategy.
14. Include Youth is in broad agreement with the twin foci set out in paragraph 2.1 of the consultation document i.e. to prevent young people from becoming NEET; and to focus on re-engaging those young people aged 16-19 who are already in the NEET category. The second outcome however should be more specific in what the purpose is of re-engaging young people who are in the NEET category.
15. While understanding the rationale Include Youth has concerns that the proposed prioritisation of work with 16-19 year olds will effectively mean that the Strategy's focus is limited to this age grouping. Include Youth recommends that this proposal should be re-considered with a view to developing a seamless Strategy that effectively addresses the needs of all young people from 16- 24 but also under 16s.
16. Aside from a proposal to assess the overall impact of current interventions, including preventative early interventions, the consultation document does not reflect an adequate emphasis on early intervention and preventative work. Include Youth recommends the inclusion of a strategic objective specifically targeted at preventative work with pre 16s.
17. The Pathways to Success Strategy should give primacy to a model of service provision which is predicated on generic early intervention, provision of universal

services and service provision that is preventative and diversionary to the greatest extent possible.

18. Include Youth believes that the projected time frame for the Strategy of three years is inadequate for a high level cross departmental Strategy designed to tackle an issue as complex and deep rooted as youth unemployment and recommends a time frame of ten years as being more appropriate.
19. The statistical categories presented need both greater explanation and expansion in relation to which young people are envisaged as fitting within each of the three categories presented.
20. While the list of 'at risk categories' presented is reasonably comprehensive, and includes the caveat that it is non-exhaustive, there are nonetheless a number of significant omissions which warrant highlighting including the impact of conflict related inter-generational trauma, racist and homophobic discrimination, asylum seeker status, low attainment levels, emotional and behavioural difficulties, offending behaviour and geographical isolation.
21. Of concern to Include Youth in the discussion of risk factors within the consultation document is the construction of barriers as being predominantly internal to the individual rather than being located externally within the structures of society. It is Include Youth's view that the lack of any analysis of the social and economic context to the NEETs issue at the outset of the consultation document contributes to this rather individualised assessment of risk factors or barriers.

Measuring Success

22. The consultation document acknowledges that there are several possible limitations to the figures currently available for young people who are NEET, an observation Include Youth would concur with. There is an need for clarity regarding the definition of NEET utilised by different government departments and agencies i.e. what is considered 'a substantial amount of time outside of any form of education, employment or training', as it is not always clear on what basis young people either fall in or out of this categorisation.
23. The Department of Justice has a key role to play, in collaboration with other government departments, agencies and with local communities in addressing the issue of young people who are NEET. For example the Department of Justice and its

agencies expend significant resources to address this issue and Include Youth would argue that resources and strategic objectives must be given due considerations when agreeing outcomes and developing services.

Current and Planned Strategic Actions

24. Include Youth is supportive of the notion of tracking young people's paths in relation to education, employment or training. However, given the ethical considerations involved in tracking, including issues around use of information, protection of personal privacy, accountability for consequences of information systems and standards to safeguard system quality, it is of utmost importance that these issues are all properly addressed in advance of the introduction of a tracking system.
25. Include Youth is supportive of plans to make access to the Careers Service available to all post-primary pupils in Northern Ireland, including those in education other than at school and those in the colleges.
26. Among the specific issues affecting 16 and 17 year olds which need to be addressed by the Strategy are lack of entitlement to social welfare benefits and difficulties obtaining appropriate accommodation. In this context outstanding proposals to amend legislation in order to give 'priority need' status to 16 and 17 year olds who are homeless but do not fall within the legislative remit of social services should be advanced without delay.
27. Include Youth welcomes the recognition in the consultation document of the role youth work can play in contributing to a range of outcomes for all young people, particularly in relation to education and employment. Yet despite this formal recognition of its value it is Include Youth's view that in practice youth work is still considered as more of an 'add-on' rather than an integral part of the education system in its broadest sense.
28. Include Youth recommends that those key elements of a youth work led approach to essential skills training which have been proven to work with young people who are NEET or at risk of becoming NEET, including the adoption of a holistic approach to learning and development, specialised training for tutors and flexible provision in a non threatening environment be incorporated into any model of provision being developed by DEL.

29. Consideration should also be given to extending such an approach to young people under 16 years of age in mainstream education but who would benefit from Essential Skills provision rather than the traditional GCSE route.
30. In view of ongoing difficulties around parity of recognition by employers of Essential Skills qualifications with other qualifications clear guidance should be given to employers and employment agencies in relation to this matter.
31. The current inequitable situation regarding entitlement to a training allowance, whereby young people participating on specialised pre-vocational training programmes are denied this allowance needs to be addressed within the context of government's response to the joint Review of Education Maintenance Allowance.
32. Recent years have witnessed a significant programme of education reforms which should impact positively on young people at risk of becoming NEET. However despite this the reality continues to be that the education system is not working for too many young people in Northern Ireland.
33. While outcomes from education for care leavers are undoubtedly moving in the right direction as a result of the strategic focus and targeted investment there remains a stark discrepancy between outcomes for looked after children and their peers.
34. The current 'cut off' at 16 years of age within education is problematic when considering many of those young people vulnerable to ending up within the NEETs category.
35. Include Youth supports the Review of Alternative Education currently underway and looks forward to its findings being released.
36. The challenge for mainstream education is how to transfer the understanding, skills, expertise and attitude from the alternative sector into mainstream education in order to ensure that all children and young people can receive a high quality, effective education within the mainstream system where at all possible.

Initial Plans for Further Work

37. The Initial Plans for Further Work section of the consultation document requires further development. There is clearly a need for some additional, focused, creative and high level strategic planning if a real reduction in the numbers of young people at risk of being NEET or already within the NEET category is to be achieved.
38. Currently specialised pre-vocational programmes such as Include Youth's Give and Take scheme, while working successfully with young people who are NEET do not get the recognition that is accorded to Registered Training Organisations and Further Education colleges.
39. Include Youth suggests that there is considerable merit in DEL reviewing its system of training provision, with a view to moving away from the current situation where all training is through a recognised training organisation with specific requirements concerning attendance and participation, to a more inclusive model which supports a continuum of service provision encompassing both mainstream training programmes such as TfS but also specialised pre-vocational training programmes such as Give and Take. Include Youth believes that a more integrated, flexible model would much better meet the needs of those young people who are NEET as well as young people at risk of becoming NEET.
40. Consideration should be given to how best to share the knowledge and skills of specialist programmes such as Give and Take in engaging with 'at risk' young people with training organisations more generally with a view to enabling those training organisations to effectively engage these young people wherever possible.
41. A more flexible, inclusive model should also address the current limitations of training provision whereby programmes only run during 'term time' as it were, leaving those young people who are already vulnerable at increased risk during the summer months as a result of the lack of structure and focus in their lives.
42. It is well recognised that young people at risk are most vulnerable when moving from one service/situation to the next, whether that be from education into training or training to employment or from supported accommodation to independent living or indeed a range of other moves. The need for support also applies for young people moving from custody back into the community.

43. Based on its extensive experience of preparing and supporting young people to move on to other education, training or employment options Include Youth firmly believes that there is a real need for an after care service from one service to the next; such a service would fit along the continuum of service provision being advocated for by Include Youth in this submission.
44. Include Youth views as a vital component of the particular continuum of services for care experienced young people not in education, employment or training the provision of the employability services currently operated across the five Health and Social Care Trusts. Consideration should be given to the replication of these services with other group of young people who are NEET such as those involved with the criminal justice system.
45. Include Youth supports the recommendation by the Employment and Learning Committee's NEET Inquiry report which recommended that the NEET Strategy must take into account that interventions should be community based where possible and that these should be holistic, involving the young person's family where possible.
46. The merits and feasibility of providing the type of 'one stop shop' within local communities, providing the co-location of services, deserves serious examination.
47. Greater consideration needs to be given within the Pathways to Success Strategy's plans for further work as to how the additional financial, childcare and other supports required by parents, carers and families will be put in place to ensure that they can play an effective supportive role in their children's individual pathways to success.
48. It is widely accepted that government alone cannot tackle the issue of young people who are not in education, employment or training. Engagement with Northern Ireland's business people and employers is absolutely central to this effort.
49. Include Youth recommends the formation of a regional Employers Forum or Task Force made up of dedicated employers that have a regional presence and can help to offer placements, training and jobs. The representation of the Equality Commission on such a body would also be required in order to provide advice and guidance on equality related matters within targeted employment initiatives which may be developed.

Steering and Implementation Mechanism

50. The lack of detail provided in the consultation document in relation to proposed steering and implementation mechanisms makes it difficult to provide an in depth commentary.
51. Include Youth has been actively involved in the Steering Group on NEETs and is supportive of the proposed forum group for stakeholders, with representation from this forum onto the joint steering and implementation body. The importance of parity of representation from the voluntary and community sector with civil servants and others on this joint body cannot be over emphasised.
52. Key to the successful implementation of the Strategy will be the existence of a high level cross departmental group to co-ordinate delivery of its objectives and actions. It will need to be included on the agenda of the Ministerial Sub-Committee on Children and Young People.
53. Include Youth believes that the new approach to children's services planning being led by the Health and Social Care Board at a regional level provides the optimal vehicle through which to take forward the implementation of the Pathways to Success Strategy. This regional approach to joint planning and commissioning of services for children and young people through the Children and Young People's Strategic Partnership should facilitate implementation of the Strategy from regional agency level down to local level.

Recommendations

1. Include Youth recommends that the Pathways to Success Strategy is underpinned by a set of human rights principles in line with international human rights obligations.
2. The strategy needs to be informed to a much greater degree by an analysis of the specific social and economic context for the development of the Pathways to Success Strategy.
3. The Pathways to Success Strategy and related implementation plans needs to be explicitly referenced in the forthcoming Programme for Government and the associated Departmental Business plans.
4. There is a need for much greater alignment of the Pathways to Success Strategy with other high level Strategies which directly impact on young people at risk of becoming or already in the NEET category.
5. Include Youth recommends that DEL carries out a full and comprehensive screening process and an EQIA of its Pathways to Success Strategy.
6. There is a need for a greater focus on structural rather than individualised barriers facing young people in accessing education, employment and training opportunities.
7. Greater emphasis should be placed within the consultation document on universal service provision, preventative work and early intervention.
8. The time frame for the Pathways to Success Strategy should be expanded from 3 to 10 years.
9. Include Youth recommends that the proposed age bands, with the proposed prioritisation of the 16-19 year age band, should be re-visited with a view to ensuring the development of a seamless strategy that effectively addresses the needs of all young people from 16-24 years but also those of under 16s.
10. Include Youth recommends that much greater emphasis should be placed on preventative work pre 16 years of age.
11. There is a need for clarification regarding the definition of NEET utilised by different government departments and agencies for counting purposes i.e. what is considered

a 'substantial amount of time outside of any form of education, employment or training'?

12. There is a need for clarification of the taxonomy used; in particular there is a need for more information on the kinds of young people and the barriers they face who are envisaged as falling into Group C i.e. 'no identifiable barrier.'
13. The list of at risk categories should be expanded to include inter-generational trauma, low attainment levels, emotional and behavioural problems, homophobic and racist bullying, asylum seeker status, rural isolation and offending behaviour.
14. While Include Youth is supportive in principle of plans to explore the tracking of young people's paths in relation to education, employment or training but given all of ethical considerations involved it is of utmost importance that these are properly addressed in advance of the introduction of a tracking system.
15. Include Youth recommends that DEL review its system of training provision, with a view to moving away from the current situation where all training is through a recognised training organisation, to a more inclusive model which supports a continuum of service provision encompassing both mainstream training programmes such as Tfs, with built in specialist support where required, but also specialised pre-vocational training programmes such as Give and Take Scheme.
16. A more flexible, inclusive model of training provision should also address the current limitations of training provision whereby programmes only run during 'term time' to ensure provision throughout the year.
17. The ongoing review of Alternative Education should address some of the difficulties young people experience in accessing its provision; some of these relate to lack of flexibility regarding admission while others relate to under resourcing.
18. Include Youth recommends the provision of a non means tested training allowance to young people who are on the Give and Take scheme or similar schemes.
19. Include Youth recommends that those key elements of a youth work approach to Essential Skills training which has been proven to work with young people who are NEET or at risk of becoming NEET be incorporated into any model of provision being developed by DEL.

20. Consideration should also be given to extending such an approach to young people under 16 years of age in mainstream education but who would benefit from Essential Skills provision rather than the traditional GCSE route.
21. Clear guidance should be given to employers and employment agencies on the equivalency of Essential Skills qualifications with other qualifications.
22. Include Youth recommends that government ensure the provision of after care services specifically designed support young people's transition from one service to the next; such a service would fit along the continuum of service provision recommended above.
23. Specific issues/barriers for 16-18 year olds including access to appropriate accommodation and provision of benefits should be addressed within the context of the Pathways to Success Strategy. Outstanding proposals to amend legislation in order to give 'priority need' status to 16 and 17 year olds who are homeless but do not fall within the remit of social services, similar to legislative provisions which exist in Scotland and England, should be advanced without delay.
24. Greater consideration needs to be given within the Pathways to Success Strategy's plans for further work as to how the additional financial, childcare and other supports required by parents, carers and families will be put in place to ensure that they can play an effective supportive role in their children's individual pathways to success.
25. Include Youth supports the recommendation by the Employment and Learning Committee's NEET Inquiry report which recommended that the NEET Strategy must take into account that interventions should be community based, holistic and, involve the young person's family where possible.
26. The merits and feasibility of providing the type of 'one stop shop' within local communities, providing the collocation of services as suggested by young people and also as recommended by the House of Commons Children, Schools and Families report on Young People Not in Education, Employment or Training deserves serious examination.
27. Include Youth recommends much greater prioritisation of engagement with business and employers within the Strategy. Specifically Include Youth recommends the formation of a regional Employers Forum or Task Force made up of dedicated employers that have a regional presence and can help to offer placements, training

and jobs to young people not in education, training or employment. Equality Commission representation on such a body would also be required in order to provide advice and guidance on equality related matters within any targeted employment initiatives to be developed.

28. Parity of representation from the voluntary and community sector with civil servants on the joint steering and implementation body must be ensured.
29. Implementation of the Pathways to Success Strategy must come within the purview of the Ministerial Sub-Committee on Children and Young People.
30. Include Youth recommends that the Children and Young People's Strategic Partnership acts as the main implementation vehicle for the Pathways to Success Strategy from regional agency level down to local level.