

include YOUTH

**Response to DSD's Consultation on the
Provision of Discretionary Support 2013 - A Consultation on
the service design**

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Introduction

Include Youth is an independent NGO that actively promotes the rights and best interests of and best practice with disadvantaged and vulnerable young people. We do this through direct service provision via our Give and Take employability scheme targeted at 16-21 year olds as well as delivering an employability service for young people in or leaving care on behalf of two of the five Health and Social Care Trusts. We also engage in policy advocacy work in the areas of employability and youth justice.

Initial consultation with the young people Include Youth works with indicated that quite a number of them have accessed both community care grants and crisis loans in the past. Based on their previous experience of accessing the Social Fund, which they report as mixed, the young people were keen to contribute their views and recommendations regarding the design of a new replacement service.

This response does not address all of the consultation questions in their entirety – rather it focuses on those issues of most relevance to the young people. The responses represent the views of young people on the Give & Take scheme in the following areas: Derry, Ballymena, Omagh, Enniskillen and Newtownards.

Q 1: Design Principles

While Include Youth is in general agreement with the 6 design principles it was unclear from the consultation document as to the status of these design principles. At paragraph 2.7 it states that Minister McCausland had already approved the high level design principles for a replacement service in July 2012. **We would question therefore whether in fact scope exists to amend the high level design principles?**

Q3: Proposal regarding direct provision of goods

Young people had mixed views on this proposal in general.

A central concern highlighted by a number of the young people was the potentially disempowering impact of removing elements of choice and decision making from the individual through the introduction of direct provision; *“(the young person) is losing a key skill and decision making power about what furniture should go into their own house”*. More fundamentally perhaps, the potential for loss of dignity and of agency by young people was also raised: *“it’s a ‘take what you’re given’ attitude”*.

Young people also raised a number of practical concerns such as the need for government to secure value for money and their belief that they might be the more thrifty shoppers (!) and ensuring that white goods supplied physically fitted into their house. One would assume that all of these issues have been fully considered in any discussions around a potential pilot direct provision service.

In support of direct provision some young people felt that this delivery mechanism would ensure that individuals received the items that they had requested. They also highlighted that there can be a cost incurred in shopping for goods by themselves which would be avoided with direct provision. A concern was also raised about the ability of vulnerable young people to properly manage larger amounts of cash received, suggesting that direct provision might be circumvent such difficulties arising.

4. Delivery mechanism for direct provision of goods

In light of the comments made above Include Youth would emphasise that if a decision is made to go ahead with a direct provision of goods pilot, serious consideration needs to be given to ensuring that the delivery mechanism is non stigmatising and that it does not disempower vulnerable and disadvantaged young people even further.

5. Reduction in maximum debt level from £1500 to £1000

Again there were mixed views on this proposal with some young people agreeing with the stated rationale of not increasing peoples' level of debt. However quite a number of young people drew attention to the fact that this proposed reduction was coming at a time of severe economic recession as well as all of the planned welfare reforms, meaning that more people will be likely to have incurred higher levels of debt, "*people are struggling as it is*", but that given the circumstances this should not debar them from applying for a loan.

16 Proposals to deliver services

Young people were generally supportive of the replacement service continuing to be delivered by the Social Security Agency using the same access channels as previously. Their preference was for face to face access, although the importance of front line advisers having the necessary information and the decision making process being as speedy as possible was emphasised; "*advisers at the desk must be fully informed*"; an example was given of a young person who had made a face to face application having to wait for a lengthy period while the advisers consulted with three different managers.

6.0 Equality

The consultation document states that the new Discretionary Support service proposals have been submitted to ‘initial equality screening’ and have been screened out on the basis that *“the new provision will assist a wider range of customers than the current Social Fund Scheme and it is not possible to accurately predict the composition of the new customer base in advance of implementation”*¹. Predicting the potential impact of a new policy on the named section 75 groups is precisely what is required under Section 75- lack of data is not an adequate reason for the screening out of a policy.

The consultation document goes on to say that the impact of the proposed new provision on Section 75 groups *“will be monitored post implementation to identify any adverse impacts and appropriate mitigation as required”*. The Equality Commission’s guidance on Section 75 is very clear as to the sequencing of steps involved for public authorities in fulfilling their statutory duties under Section 75 – steps involved in the screening process are set out in a flow chart at page 59 of the guidance.² The guidance also underlines the importance of following the stages of the process correctly *“It is important that public authorities use the assessment of policies for impact on equality of opportunity, including screening and equality impact assessment, as part of their policy development process, rather than as an afterthought when the policy has been established”*³

It is clear that the Department’s approach to conducting a screening exercise in this instance is not in compliance with the statutory guidance. **Include Youth recommends that DSD revisits its equality screening and ensures that it complies fully with statutory guidance.**

Concluding remarks

We hope that these comments will be useful to the Department in the development of the new discretionary support service. We would appreciate feedback in due course as to how the views expressed in this response have been taken on board. As you’ll understand we have an obligation towards the young people consulted with in this regard. We would also like to be kept informed as to the outcome of the consultation and the next steps in the process.

¹ Department of Social Development (January 2013) Provision of Discretionary Support 2013 A consultation on the service design, page 31

² Equality Commission Northern Ireland (2010) Section 75 of the Northern Ireland Act 1998 A Guide for Public Authorities

³ Ibid page 13