

**Stronger From the Start Infant Mental Health Alliance**

Comments on the Department of Education’s EQIA Consultation Report on the 2023-24 Resource Budget

August 2023

**Introduction**

The Stronger from the Start Alliance is a collaboration between the Association for Infant Mental Health Northern Ireland (AIMH NI) and organisations from across the community and voluntary sector in Northern Ireland.

Our member agencies are committed to collaborating in the best interests of infants and their families. We are working together to amplify infant mental health in Northern Ireland and to campaign for meaningful change in policy, practice and life experiences.

Stronger from the Start was established in response to the absence of sufficient actions and outcomes relating to infant mental health within the draft Mental Health Strategy for Northern Ireland issued for consultation in 2021.

The group brings a collective voice to campaigning and lobbying for the importance of the first 1001 days, and the need to prioritise infants and their families in strategy development and service delivery.

The following organisations sit on the Stronger from the Start steering group:

* Action for Children
* Barnardo’s NI
* NSPCC
* National Children’s Bureau
* Save the Children
* Sure Start (South Belfast and East Belfast)
* TinyLife

**Responses to Consultation Questions**

1. **Are there any data needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 5 and 6 of the EQIA consultation document? If so, what are they? Please provide details.**

We are disappointed to note an absence of reference to the **science of early childhood development** in this EQIA - most notably in respect of race and disability - and the extent to which children in these protected groups disproportionately experience adversity. Children who are exposed to prolonged periods of suffering, difficulty and hardship are adversely affected in their life chances, not only in their childhood years but into adulthood.

Children who belong to minority ethnic groups and those who live with disabilities are particularly vulnerable to Adverse Childhood Experiences (ACEs)[[1]](#footnote-1) [[2]](#footnote-2). The NI Review of Children’s Social Care Services also painted a stark picture of increasing demand and unmet need for children’s social care services. Northern Ireland is experiencing proportionately more referrals to statutory children’s social care services, with a higher proportion of our child population seen as ‘children in need’[[3]](#footnote-3). A significant proportion of children in care will have had some adverse childhood experiences, given that abuse and neglect are the most common reasons for entering care[[4]](#footnote-4).

**Children in care and those belonging to section 75 groups therefore require more early intervention and prevention to improve their life outcomes, which in turn results in long-term savings for public expenditure[[5]](#footnote-5)**. Northern Ireland spends a total of £536 million per year on late intervention[[6]](#footnote-6). This equates to £288 per head, or £1,166 per child. Late intervention issues are often related and cumulative. Successful early intervention should tackle the root causes of these issues and consider the connections between the different issues which children and young people face. The case for investing in these services is clear - Sure Start centres, for example, act as a ‘one stop shop’ encompassing health services, parenting support programmes and access to childcare and early education. Attendance at Sure Start services reduces hospitalisations during childhood and adolescence, strengthening infants’ immune systems and supporting socio-emotional and behavioural development[[7]](#footnote-7).

We also note that the data used in this EQIA relates to school-aged children. The impacts of this budget on children aged 0-5 have therefore presumably not been considered. One example of the failure to adequately consider the needs of pre-school aged children is the impending closure of nurseries in special schools, which will have major detrimental impacts on our youngest children living with disabilities.

We are also concerned that the data used to determine the number of children enrolled in pre-schools is taken only from school census data. This does not capture the numbers of children living in Sure Start areas, making it difficult to assess the impact of cuts to pre-school programmes on the youngest and most vulnerable children.

1. **Are there any adverse impacts in relation to any of the Section 75 equality categories that have not been identified in section 6 of the EQIA consultation document? If so, what are they?**

It is difficult for us, as an alliance advocating for infant mental health, to identify specific adverse impacts in the absence of detail on how this budget will affect different age groups - notably, those aged 0-4.

We note that the Department considers that some groups will experience only minor negative impacts from budget reductions to specific programmes, including:

* Children belonging to minority ethnic groups (Healthy Happy Minds, Engage Programme, Extended Schools)
* Children and young people in general (Playboard NI Play Policy, BookStart Programme)
* Children living with disabilities (Belfast-wide Early Years Pilot under Fair Start, Playboard NI Play Policy, Engage Programme, Extended Schools)

**We firmly believe that each of these groups will experience major, rather than minor, negative impacts from budget reductions to these and other mental health and emotional wellbeing services in early years.** As referenced in our answer to question 1 above, the lack of data relating to early childhood development in the EQIA is likely responsible for this misclassification. Regarding the proposed cuts to the BookStart scheme, there is a wealth of evidence to support the view that shared book reading at home supports positive parent-child interaction and lays an important foundation for the development of comprehension and vocabulary[[8]](#footnote-8). The BookStart scheme reached 20,000 families across NI and was an excellent example of successful collaboration between education and health in successful early childhood intervention. Without it, infants in NI will be the only children in the UK who do not receive this support.

It is important to adequately classify the impacts of cuts to services that set children on a positive developmental trajectory from the earliest possible stages. **Only some of these major adverse impacts will be felt during the 2023/24 budget year - the majority will be experienced in the years to come and well into adulthood.**

1. **Please state what action you think could be taken to reduce or eliminate any adverse impacts in seeking to manage the Department’s resource budget.**

We note that the mitigating measure for cuts to the Belfast-wide Early Years Pilot under Fair Start is that the *“voluntary and community sector partner will absorb reduction to ensure that service delivery is maintained at current level”*. It cannot be assumed that the community and voluntary sector will act as a mitigating factor to reduce the impact of or justify budget cuts. The sector is in an extremely fragile position due to funding cuts and service pressures. It cannot be assumed that community and voluntary organisations will be able to fill the ever-widening gaps in statutory provision.

The EQIA states that the Department has already considered its ability to deliver internal efficiencies prior to the need to reduce or stop service delivery or any reduction to ALBs and the community and voluntary sector. However, no details of this review of internal efficiencies are given, making it difficult for stakeholders to identify any additional possible efficiencies that could be made. We recommend that the Department undertakes a thorough, transparent and public review of its own spending and procurement processes to ensure that best value for money is truly being achieved.

We also recommend that the Department ring-fences budget allocations that relate to early years services and programmes, in recognition of the fact that investment in early years is a previously-established Executive priority[[9]](#footnote-9). It is even more important that funding is ring-fenced for services designed to reach the most vulnerable children and young people - namely, those belonging to section 75 groups and especially those occupying multiple section 75 characteristics.

Aside from these measures, it is very difficult to determine what other savings might be made without seeing more detail of all budget allocations and their subsequent impacts. No other alternative options to each reduction have been proposed, costed and equality impact-assessed in this EQIA.

Equality Commission Guidance highlights the importance of considering mitigating measures and alternative policies during the EQIA process. It is the Department’s responsibility to consider ways of delivering policy aims that have a less adverse effect on relevant section 75 groups, or that better promote equality of opportunity for these groups[[10]](#footnote-10).

In addition, the United Nations Committee on the Rights of the Child (CRC) General comment No. 19 on public budgeting for the realisation of children’s rights states:

*“In times of economic crisis, regressive measures may only be considered after assessing all other options and ensuring that children are the last to be affected, especially children in vulnerable situations. States parties shall demonstrate that such measures are necessary, reasonable, proportionate, non-discriminatory and temporary and that any rights thus affected will be restored as soon as possible. …* ***The immediate and minimum core obligations imposed by children’s rights shall not be compromised by any retrogressive measures, even in times of economic crisis****.”[[11]](#footnote-11)*

As the Department of Education has lead responsibility for children’s rights, we request to see evidence of efforts to meaningfully protect and enhance children’s rights.

This proposed budget would see a deterioration in the existing level of enjoyment of children’s rights, without adequate mitigations identified. The majority of mitigations listed in the EQIA simply identify alternative services that are already in existence[[12]](#footnote-12).

In this context, earlier this summer the UN CRC recommended that the 2023/24 NI budget is withdrawn, and that equality and human rights implications of a new budget are fully considered with all possible steps being taken to mitigate any adverse impact on children’s rights[[13]](#footnote-13). **We ask that DE’s budget be withdrawn and similarly revised, in order to ensure that the Department meets its obligations under the United Nations Convention on the Rights of the Child**.

1. **Are there any other comments you would like to make in regard to the consultation process generally?**

We appreciate that the Department is faced with some extremely difficult financial and operational challenges resulting from a budget that was imposed by the NI Secretary of State. However, we believe that the content of this budget reflects a fire-fighting, ‘crisis mode’ mindset and does not recognise that the proposed cuts will have wide-reaching and long-term consequences on infants and children as they grow up, as well as presenting significant challenges for future budgets and public spending.

The children and early years sector welcomed the Permanent Secretary’s decision not to cut funding to youth services and a range of early years programmes, including the Pathway Fund, Sure Start, Bright Start and Toybox, and not to proceed with the full scale of proposed cuts to Extended Schools. We strongly agree that the proposed cuts to these programmes would have represented a major change to long standing Ministerial programmes and policies, with significant negative, long-term impacts on infants, children, young people and families.

However, we are concerned that these cuts have only been temporarily parked. The community and voluntary sector still faces a significant amount of financial uncertainty, meaning that many organisations cannot plan services and staffing changes in an efficient and effective manner.

A lack of regular, inflationary increases in allocations to community and voluntary sector organisations delivering services on behalf of the Department has had the effect of driving down wages and terms and conditions for workers in the sector. This has, in turn, resulted in unacceptable inequalities between workers employed directly by government departments and arms length bodies and those working in the community and voluntary sector. This is of particular relevance to early years expenditure, where, outside of school nursery and some pre-school units, almost all other programmes and services are delivered by the community and voluntary sector.

In his review of children’s social care services in Northern Ireland, Professor Ray Jones recommends that the relationship between statutory funders of children’s services and the community and voluntary sector is re-set as a meaningful partnership, rather than a purchasing relationship. He also recommends longer-term funding commitments and increased funding and investment to respond to spiralling levels of poverty felt by infants, children and families. We wholly endorse these recommendations[[14]](#footnote-14). It is particularly disappointing that despite this Review’s call for an expansion of Sure Start and family support services in order to drive down the numbers of child protection and children in care, our current budgetary position has made these services so tenuous.

In a more normal year, if the Treasury awards a percentage uplift to the Department via the NI block grant, this uplift should be applied to the allocations given to the community and voluntary sector. However, we appreciate that the 2023/24 budget has not seen this uplift, forcing the Department into an extremely challenging financial position. Nevertheless, we wish to place on the record that community and voluntary organisations working in early years are also facing substantial, sector-wide pressures, and will be increasingly unable to fill the gaps in statutory provision.

The Stronger From the Start Alliance wrote to the Department on 6th July 2023,

expressing our concern about the implications of this budget in relation to early infant mental health. We received return correspondence from Lorraine Brown of the Early Years - Learning to Learn team, dated 17th July. In this letter, it is stated that “*investment in the Early Years remains a priority for the Department of Education”*. Ms Brown also highlights the *“Department’s continued commitment to high equality early years education and learning provision”*. There is clear dissonance between the commitment to early years and early intervention outlined in this correspondence and the budget decisions that are currently being made, as well as those that are further proposed.

The budget allocation for the ‘Fair Start’ action plan is just one example of the gap between the Department’s stated policy commitments and investment; £21m of investment was recommended by the Fair Start panel, but only £2.5m was allocated. The importance of early investment in child development cannot be overstated. The Heckman Curve clearly demonstrates that the earlier the investment (e.g. in prenatal programmes and programmes targeted toward the earliest years and pre-school), the greater the return on that investment[[15]](#footnote-15). The Fair Start panel recognised this, and made redirecting Departmental focus to early years a key priority. The previous draft Programme for Government in 2021 also identified early years as a key priority area, acknowledging the importance of children and young people having the best start in life. Similarly, one of the aims of the Children and Young People’s Strategy 2020 - 2030 is to focus “*on the impact that policies, strategies or programmes have on the well-being of children and young people, rather than on the amount of money spent”[[16]](#footnote-16)*. The Strategy recognises the importance of early and sustained help, support and intervention, making a commitment to ensuring that Children’s Authorities’ policies and programmes focus on the provision of help, support and early intervention - both universal and specific - and that services are structured to support children and young people as long as necessary.

**Investing in child development from the earliest possible stages will not only foster good relationships and promote mental, emotional and social wellbeing - it will also save DE (as well as other departments, public authorities and arms length bodies) significantly more money in the longer-term, when social, emotional and mental health issues might otherwise have become more entrenched or complex.**

As referenced above, our member organisations are increasingly having to focus on direct service delivery and providing support to children and families, with the depth and complexity of need meaning that practical action at ground level is, by necessity, prioritised over strategic influencing. We expect that many agencies will not, therefore, be in a position to make individual responses to this consultation exercise. The Department should not assume consent from that silence.

1. Forde et al (2019) The weathering hypothesis as an explanation for racial disparities in health: a systematic review. *Annals of Epidemiology, 33,* 1-18.e3 [↑](#footnote-ref-1)
2. Morgart et al (2021) Adverse childhood experiences and developmental disabilities: risks, resiliency, and policy. *Developmental Medicine & Child Neurology, 63(10),* 1149-1154 [↑](#footnote-ref-2)
3. Department of Health (2023) [*Report of the Independent Review of Children’s Social Care Services in Northern Ireland*](https://www.cscsreviewni.net/files/cscsreviewni/2023-06/The%20NI%20Review%20of%20Children%27s%20Social%20Care%20Services.pdf) [↑](#footnote-ref-3)
4. National Institute for Health and Care Excellence (2021) [*Looked-after children and young people*](https://www.nice.org.uk/guidance/ng205) [↑](#footnote-ref-4)
5. Heckmanequation.org (2012) [Invest in Early Childhood Development: Reduce Deficits, Strengthen the Economy](https://heckmanequation.org/resource/invest-in-early-childhood-development-reduce-deficits-strengthen-the-economy/) [↑](#footnote-ref-5)
6. Early Intervention Foundation (2018) [The cost of late intervention in Northern Ireland](https://documents-dds-ny.un.org/doc/UNDOC/GEN/G16/162/31/PDF/G1616231.pdf?OpenElement) [↑](#footnote-ref-6)
7. Institute for Fiscal Studies (2021) [*The Health Impacts of Sure Start*](https://ifs.org.uk/publications/health-impacts-sure-start) [↑](#footnote-ref-7)
8. See Grolig, L. (2020) Shared Storybook Reading and Oral Language Development: A Bioecological Perspective. *Frontiers in Psychology*, 11 and Leech, K.A. et al (2022) Unique effects of book-reading at 9-months on vocabulary development at 36-months: Insights from a nationally representative sample of Irish families. *Early Childhood Research Quarterly*, 58, 242-53 [↑](#footnote-ref-8)
9. Please see our answer to Q4 below for further detail. [↑](#footnote-ref-9)
10. Equality Commission (2005) [*Section 75 of the Northern Ireland Act 1998: Practical Guidance on Equality Impact Assessment*](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance(2005).pdf) [↑](#footnote-ref-10)
11. UN CRC (2016) [*General comment No. 19 (2016) on public budgeting for the realization of children’s rights (art. 4)*](https://digitallibrary.un.org/record/838730?ln=en#record-files-collapse-header), para. 31 [↑](#footnote-ref-11)
12. For example, the mitigation identified for the cessation of Healthy Happy Minds makes reference to alternative community and voluntary supports available to children and young people, the Education Authority’s Pupil Support Services, the Intercultural Education Service and Child and Adolescent Mental Health Service and Family Hubs. In the absence of Happy Healthy Minds, these services will only be put under even greater pressure. [↑](#footnote-ref-12)
13. UN CRC (2023) [*Concluding observations on the combined 6th and 7th periodic reports of the United Kingdom of Great Britain and Northern Ireland: Committee on the Rights of the Child*](https://digitallibrary.un.org/record/4013807) [↑](#footnote-ref-13)
14. Jones, R. (2023) [*The Northern Ireland Review of Children’s Social Care Services Report*](https://consultations2.nidirect.gov.uk/dfi-1/consultation-on-free-and-discounted-fares-on-publi/), p. 20 [↑](#footnote-ref-14)
15. Heckmanequation.org (2012) [Invest in Early Childhood Development: Reduce Deficits, Strengthen the Economy](https://heckmanequation.org/resource/invest-in-early-childhood-development-reduce-deficits-strengthen-the-economy/) [↑](#footnote-ref-15)
16. The Executive Office (2020) [*Children and Young People’s Strategy 2020 - 2030*](https://www.education-ni.gov.uk/sites/default/files/publications/education/final-execuitve-children-and-young-people%27s-strategy-2020-2030.pdf), p.16 [↑](#footnote-ref-16)