



Review of the Poverty Proofing Process

Submission by the

Combat Poverty Agency

To The

Office for Social Inclusion

Department of Social and Family Affairs

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1. Introduction

Combat Poverty welcomes the opportunity to make a submission to the Office for Social Inclusion (OSI) on its review of poverty proofing. This review is timely, as we believe that poverty proofing needs to be re-energised and reinforced as a concept in the policy making arena. It is important to build on the conclusions and recommendations of the National Economic and Social Council (NESCC) Review of the Poverty Proofing Process (2001). We are supportive of the decision to develop a framework for mainstreaming poverty proofing and the decision to revise the current guidelines with the purpose of developing an adequate tool for proofing purposes.

Poverty Proofing – the mechanism for assessing policies and programmes for their impact on people in poverty or at risk of poverty – should be at the heart of policy making. Recent statistics show that 9% of Ireland's population are in consistent poverty, a total of 374,000 people, which reinforces the need to mainstream poverty proofing into the process of policy making at all levels of government and administration. If poverty is to be eliminated as set out in the National Anti-Poverty Strategy (NAPS), it needs those involved in the formulation of policy to take into consideration, in the decision making process, how proposed policies might impact on poverty levels.

In response to a letter sent from the Office for Social Inclusion (OSI) to Combat Poverty regarding the poverty proofing review, this paper outlines our views on the poverty proofing operation, provides comments on the current guidelines and expresses our support in relation to mainstreaming poverty proofing.

Section 2 outlines the Terms of Reference (TOR) and highlights the relevant sections where we comment on the various TOR objectives. Section 3 addresses conceptual issues, while Section 4 makes suggestions on the practical elements of poverty proofing. Section 5 outlines a brief commentary on a 'best practice' approach of poverty proofing and Section 6 summarises the key recommendations that emerge throughout the submission paper.

2. Terms of Reference

As stated in the Office for Social Inclusion's documentation "the overall objective of the current review is to develop meaningful and effective methods of poverty proofing for incorporation in the processes for evaluating and developing policies, in order to ensure a focus on policy impacts, including their potential for alleviation of poverty and social exclusion."

Table 1 highlights the various sections which address the related Terms of Reference (TOR) objectives.

TABLE 1: TERMS OF REFERENCE (TOR)	
Objectives	Relevant Sections
1. Review the stated objectives of poverty proofing and examine its effectiveness to date.	Section 3.1- Objectives
2. Examine existing guidelines and revise, in the context of the issues raised in the NESC <i>Review of the Poverty Proofing Process</i> , the consultation process and other developments that have taken place since the introduction of the original guidelines.	Mentioned in various Sections, particularly Section 4.1 - Guidelines
3. Set out a framework in relation to how the revised guidelines could be mainstreamed, having regard to the role of poverty proofing in raising awareness of social inclusion issues generally.	Section 4.2 - Delivery Approach & Responsibility
4. Consider how the development and application of performance indicators (e.g. no. of proposals poverty proofed at design stage, at review stage etc.) can assist in integrating poverty proofing into the policy evaluation and development processes and with ongoing monitoring and evaluation of the implementation and effectiveness of the poverty proofing process.	Section 3.3 - Proofing Sources.
5. Consider the extent to which, and how, the guidelines may need to be adapted for application to the specific policy areas of individual Departments.	Section 4.1 - Guidelines
6. Consider the extension of poverty proofing to the policies and programmes of local authorities and other relevant regional and local Government institutions, having regard to the work already done in this field by the Combat Poverty Agency.	Section 4.2 - Delivery Approach & Responsibility
7. Consider the possibility of integrating poverty proofing with other types of proofing having regard to the work already carried out in this area, for example, the Integrated Proofing Pilot Project.	Section 4.1 - Guidelines
8. Consider approaches taken in other countries, particularly in relation to impact assessment and policy evaluation, where appropriate.	Section 4.2 - Delivery Approach & Responsibility

3. Poverty Proofing Concept & Design

3.1 Objectives

Combat Poverty welcomes the opportunity to revisit the purpose of poverty proofing and related objectives. As noted in the NESR Review of the Poverty Proofing Process in 2001, "proofing as a term is problematic and needs to be clearly defined and explained". Combat Poverty see poverty proofing as a procedure which should result in enhanced outcomes for people who are in poverty. In addition, it is a procedure which has the ability to shift policies (if necessary) to take into consideration the needs of those who are experiencing poverty or at risk of poverty.

To date poverty proofing has had a positive impact in sensitising individuals involved in the policy formation process to the needs of people in poverty. However, we believe poverty proofing now needs to place emphasis on ensuring that policies are designed and implemented in a way that benefits people living in poverty. The objectives of poverty proofing should reflect this.

Recommendation

A(i) To revisit and revise the **purpose** of poverty proofing and related **objectives**.

3.2 NAPS & NAP/Inclusion

Specifically the Poverty Proofing objectives should be explicitly linked to the National Action Plan against Poverty and Social Exclusion (NAP/Incl). When poverty proofing was first developed in 1998 it had the following objectives:

- a) to act as a tool in the implementation of Plan's to tackle poverty and social exclusion, in particular ensuring and subsequently measuring the degree to which the NAPS targets are being achieved;
- b) to assist Departments to assess the impact of their spending on anti-poverty measures and, if necessary, to refocus their expenditure to meet the NAPS targets;
- c) to ensure that policies and programmes do not contribute to greater poverty or inequality;
- d) to ensure that potential policies and programmes are developed in a way that benefits people living in poverty and prevents others from falling into poverty;
- e) to assist the subsequent monitoring and evaluation of the NAP/Incl.

These objectives now need to be updated to reflect the current National Action Plan against Poverty and Social Exclusion, 2003-2005(NAP/Incl), but also reflected in such a way that they are not time-bound, for example:

- a) to ensure that potential policies and programmes are developed in a way that benefits people living in poverty and prevents others from falling into poverty;
- b) to ensure that policies and programmes do not contribute to greater poverty or inequality;
- c) to act as a tool in the implementation of Plan's to tackle poverty and social exclusion, in particular ensuring and subsequently measuring the degree to which the NAPS targets are being achieved;
- d) to assist Departments to assess the impact of their spending on anti-poverty measures and, if necessary, to refocus their expenditure to meet the NAPS targets;
- e) to assist the subsequent monitoring and evaluation of the NAP/Incl.

A communication strategy is essential to keep policy makers informed about progress on the NAPIncl and on the application of poverty proofing. Mechanisms need to be put in place to ensure this information is disseminated to all policy makers and is readily available and updated as necessary. Website technology can assist in this process.

The Office for Social Inclusion has recently undertaken a review of the NAPS targets and in so doing requested that Departments provide reporting information on whether they are meeting the NAPS targets and to highlight what activities they are undertaking to meet these targets. Information and findings emerging from this review should add to the development of the poverty proofing process.

Recommendation

A(i) To revisit and revise the **purpose** of poverty proofing and related **objectives**, taking account of the National Anti-Poverty Strategy and the National Action Plan on poverty and social exclusion (**NAPS&NAP/Inclusion**).

A(ii) To encourage the use of poverty proofing to make progress towards achievement of the **NAPS/NAPIncl targets**.

A(iii) To put in place a **communication strategy** to inform policy makers of NAPS/NAPIncl and poverty proofing and ensure it is readily available and updated.

3.3 Addressing Policy Priorities

Policy proofing in general and poverty proofing in particular, needs to include a methodology for dealing with competing policy priorities. Policies to reduce poverty often compete with other national policy priorities for limited resources e.g. competitiveness. The national social partnership agreement may be a way of establishing such policy priorities.

Recommendation

A(iv) To ensure policy proofing and poverty proofing in particular has a methodology in place to deal with **competing policy priorities**.

3.4 Proofing Information Sources

3.4.1 Overview

The NESC review highlighted the importance of information to assist in the proofing process. Essentially this encompasses three broad areas – data and indicators, consultation and monitoring and evaluation.

3.4.2 Relevant Data & Indicators

“It is necessary to ensure that there is a clear understanding of poverty and how it is measured, so that measurement is operationalised in a way that is feasible for government officials”¹. As mentioned in the NESC review, rectifying data deficiencies and the identification of indicators is essential for successful proofing.

NESC recommended a framework for the development of indicators by which progress can be measured. Since the NESC review, there has been a report on social and economic indicators - an initiative to maximise administrative data.² A further development is the commitment to a NAPS data strategy led by the Office for Social Inclusion.

At European level, common indicators to measure poverty and social exclusion have been developed. In addition, Combat Poverty, building on earlier work³, is developing a periodic monitoring report on poverty and social exclusion. The report will give a comprehensive overview of trends in Poverty and Social Exclusion by combining the EU common indicators with a set of national-specific indicators. The national indicators will have two components:

- indicators which relate to the main themes in the National Anti-Poverty Strategy/National Action Plan on Poverty and Social Exclusion: education; housing; health; income; employment. It may also be possible to develop indicators for access to key services, such as transport, financial services, and legal services;
- indicators which relate to the vulnerable groups/areas in the National Anti-Poverty Strategy/National Action Plan on poverty and social exclusion: children; women; older people; people with disabilities; members of the Traveller Community; ethnic minorities;

¹ National Economic and Social Council, *Review of the Poverty Proofing Process*, 2001

² CSO, *Measuring Ireland's Progress, Indicator Report 2003*

³ Palmer G & Rahman M, *Monitoring Progress on Poverty, A Policy Guide on the Use of Social Indicators*, Combat Poverty Agency 2002; Corrigan C, Fitzgerald E, & Matthews A, *Data Sources on Poverty*, Combat Poverty Agency, 2002.

disadvantaged urban areas; disadvantaged rural areas. It is also proposed to explore possible indicators for other groups such as people who are homeless, drug users, asylum seekers and prisoners.

The indicators will be chosen following consultation with relevant stakeholders drawn from government, the social partners, people experiencing poverty (and their representatives) and research experts. This report will contribute relevant indicator information to the poverty proofing process.

For poverty proofing to be effective there will be a need to provide a reference guide to the main information sources and ensure that these are readily available e.g. through the web.

Recommendation

A(v) To ensure the development of **data sources** and **performance indicators** which can inform the assessment process.

3.4.3 Involvement & Participation

Combat Poverty believes that consultation should inform policy development and implementation. Policies intended to tackle poverty are much more likely to work if the people and communities they are designed for are involved in their planning and implementation. There are in existence a number of mechanisms and structures to facilitate the involvement of people experiencing poverty in the policy process. These include:

- County and City Development Boards;
- Community Forums;
- Strategic Policy Committees;
- County Childcare Committees;
- Vocational Education Committees.

Combat Poverty is currently implementing a Practice to Policy Programme which seeks to strengthen the voice of people and communities living in poverty. Combat Poverty believes that people have a right to influence and participate in the decisions that affect them and to have their views and experiences listened to and acted on.

For effective poverty proofing the involvement of people experiencing poverty and their representatives should be part of the process. Officials involved in poverty proofing should be made aware of existing consultation mechanisms and information, which they can avail of, to inform policy decisions.

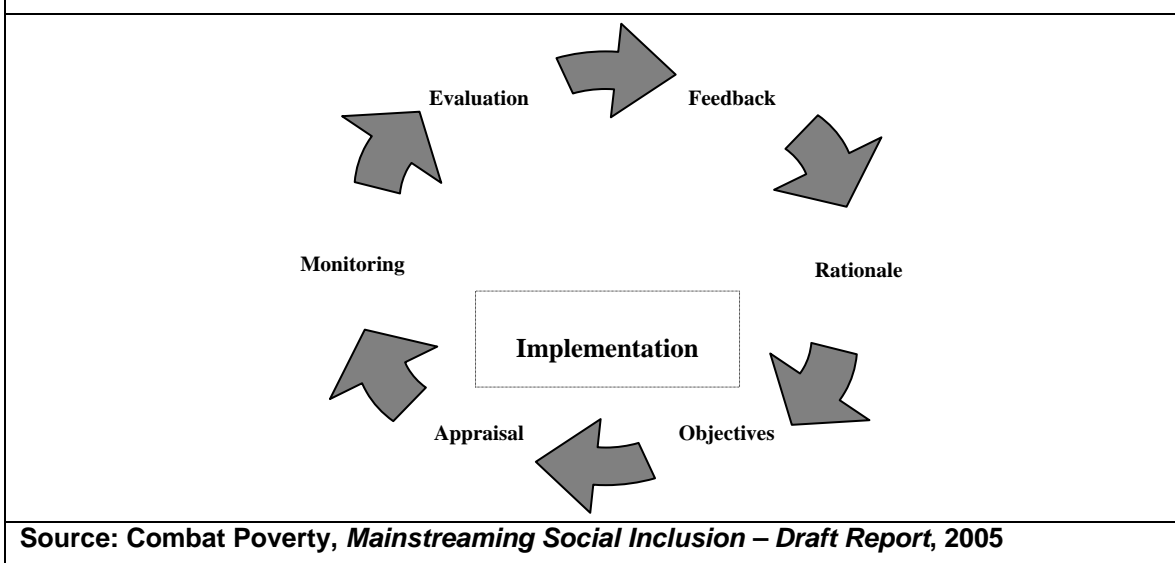
Recommendation

A(vi) To encourage **consultation** at all levels for policy development and implementation and to draw upon current structures which are already in place to facilitate the **involvement of people experiencing poverty** in the policy process e.g. Community Forums and County & City Development Boards.

3.4.4 Monitoring & Evaluation

Policy evaluation should form part of the policy cycle as illustrated in Figure 1. As well as proofing policies at design stage for their impact on poverty it is also critical to assess the impact of the policies on people living in poverty, this was also raised in the NESC review where it stated that “in addition to first-level proofing of all proposals for likely impact on poverty and associated inequalities as at present, the practice of in-depth policy impact assessment should be undertaken”.

Figure 1: Poverty Proofing At Various Stages Along The Policy Cycle



Source: Combat Poverty, *Mainstreaming Social Inclusion – Draft Report, 2005*

Through the European Transnational Exchange Programme (TEP), Combat Poverty are leading a transnational project on mainstreaming social exclusion (MSI). Poverty proofing is a tool for mainstreaming social exclusion which is “*the integration of poverty and social inclusion issues, including an equality perspective, into all areas and levels of policy-making and that is promoted through the participation of public bodies, social partners, NGOs and other relevant actors*”⁴. As part of the project Combat Poverty and its partners have developed an evaluation framework for

⁴ Combat Poverty, *Mainstreaming Social Inclusion*, Draft Report, 2005

assessing the extent of mainstreaming and its impact on poverty. There is the potential to “adapt” such an approach to assess the impact of policies on people living in poverty.

Recommendation

A(vii) To embed **monitoring** and **evaluation** processes in the poverty proofing procedure.

4. Poverty Proofing Approach

4.1 Guidelines

4.1.1 Overview

This section addresses the specific application of poverty proofing through the application of revised guidelines. While guidelines have the drawback that they may become a tick box exercise, they do provide a structured approach to poverty proofing. However, they must be applied in such a way that they assist the policy development process and improve outcomes for people living in poverty. Thus, they must support the policy maker, through capacity building and training and not be just “another bureaucratic task”.

4.1.2 NESCS Recommendations

Combat Poverty concurs with the recommendations outlined in the NESCS Review of the Poverty Proofing Process, 2001, where it states that “the guidelines must be revised to present a more streamlined approach to impact assessment”. It recommends that the “revised guidelines must:

- be customised to the policy domains of individual Department in co-operation with those Departments;
- address the issue of operationalisation and measurement of poverty;
- outline a framework for the development of indicators by which achievements can be measured and progress audited;
- provide information on data sources including data at a disaggregated level”.

Recommendation

B(i): To revise the **guidelines** to present a more streamlined approach to poverty proofing as suggested in the NESCS review.

4.1.3 Categorise Policies

To maximize effectiveness and impact and minimise bureaucracy, Combat Poverty proposes that policies should be screened. Some policies should undergo in-depth proofing while others should

undergo less rigorous proofing. From MSI work we would suggest that the following classifications might assist in screening policies and legislation:

- *“targeted policies:* developed specifically to direct resources at a particular problem and to fast track a solution such as reduction in long term unemployment, the promotion of social housing or community regeneration;
- *specific policies:* which have a direct impact on people and vulnerable groups at risk of poverty and social exclusion, such as social security, employment, housing, education or health. The NAPIncl is an example of an overarching policy in this category;
- *global policies:* which are the extensive range of other policies such as communication, transport, environment or agriculture, not specifically designed to tackle poverty but which, nevertheless, have an impact on those in poverty and at risk of been socially excluded”⁵.

Specific elements of the guidelines could include targeted information and examples on how to proof each policy category, for example, guidelines in varying degrees of detail could be devised for each of the types of policies, stimulated by an initial few questions.

Recommendation

B(ii) To categorise polices at the pre-assessment screening stage;

4.1.4 Policy Documentation

Poverty proofing is mandated in:

- the preparation of SMI Statements of Strategy and Annual Business Plans;
- designing policies and preparing Memoranda to Government on significant policy proposals;
- the preparation of the Estimates and Annual Budget proposals –including expenditure reviews and programme evaluations;
- the preparation of the National Development Plan and other relevant EU Plans and Programmes;
- the preparation of legislation.

Although this is the case, implementation of poverty proofing in all of these policy types is not yet evident and so Combat Poverty would like the review to suggest ways in which the guidelines can be tailored to take account of the various types of policy documentation.

⁵ Combat Poverty, Mainstreaming Social Inclusion, Draft Report, 2005

Recommendation

B(iii) To tailor the guidelines in order to take account of the various types of policy documentation e.g. plans, proposals, legislation etc.

4.1.5 Proofing Integration

Combat Poverty welcomes point seven under the TOR, where the review aims to “consider the possibility of integrating poverty proofing with other types of proofing having regard to the work already carried out in this area”. The development of such an approach is essential to improve effectiveness in addressing poverty, exclusion and inequality while at the same time minimising bureaucracy.

The findings from the Integrated Proofing Pilot Project, which has applied integrated proofing across two policies – *Back to Education Initiative and National Action Plan Against Racism*– is a useful starting point for the development and application of an integrated approach.

Recommendation

B(iv) To **assess** the findings from the **Integrated Proofing** Pilot Project in order to consider the possibility of **integrating poverty proofing** with other types of proofing.

4.2 Delivery Approach & Responsibility

4.2.1 Delivery at National Level

From an initial review of existing approaches it would seem to us that there are a number of ways that application of poverty proofing could be supported at national level. While we envisage this will be part of the ongoing review we would suggest that the following approaches be considered:

1. developing capacity to poverty proof by integrating poverty proofing into the current policy making process and by ensuring government officials and administrators are skilled in the area of poverty proofing. There could be a particular emphasis on integrated proofing here;
2. developing a cross-departmental panel of experts who are skilled in poverty proofing to poverty audit all policies;
3. NESCC's recommendation to have a central specialist unit (e.g. OSI) with expertise in impact assessment, which would have a clear role to ensure a poverty proofing focus from the strategic planning level right through to the operational and service delivery level;

4. ensure that there is a number of policy proofing experts ,at senior official level, available in all Departments whose specific role is to assess policy for various impacts on society, including poverty, as well as to support and resource officials involved in the policy proofing process;
5. make poverty proofing a statutory requirement and mandate Combat Poverty to have a regulatory role in ensuring compliance with the requirement (similar to the Equality Commission and Section 75 Legislation in Northern Ireland and the Environmental Protection Agency in Ireland and Environmental Impact Assessments);
6. “to consider approaches taken in other countries”, as per objective 8 of the TOR.

Combat Poverty acknowledges that there are costs and benefits to the various approaches which will be examined as part of the review in order to determine a suitable approach, and we also acknowledge that the approaches are not mutually exclusive. However, we currently favour option four, which includes having skilled policy proofing experts in Departments, who would have the responsibility of delivering the process. We support this approach as it will:

- aim to integrate proofing in all Departments rather than diverting it to a specific unit
- provide a resource to senior officials in policy design;
- support the integral development of policy proofing across Government;
- ensure a commonality approach which is tailored to Departments needs;
- address the issue of staff turnover.

There is also merit in considering option 4 in conjunction with option 5, based on the Northern Ireland experience under Section 75 legislation but with appropriate adaptations (see Section 4.4).

Recommendation

B(v) To consider various **proofing approaches**, in particular, the suggested option of having skilled policy proofing experts in Departments, who would have the responsibility of delivering proofing processes.

4.2.2 Delivery at Local Level

“It is important that we recognise the linkages between our national policies in relation to poverty and social inclusion and the work done of those on the front line of service delivery at a local level. These links are at the heart of what we are trying to achieve in the NAP/Inclusion as those with greater understanding can inform the development of policy in local areas”⁶.

⁶ Minister Seamus Brennan, Foreword, *A Guide to Developing a Local Anti-Poverty Strategy*, 2005

Although poverty proofing as a concept should be equivalent at national and local level, we believe that the practical element of poverty proofing should be delivered differently, due to the diversity of structures. Combat Poverty has developed brief guidelines to poverty proofing for Local Authorities in the recently published Local Anti-Poverty Strategy Guide. To develop this Combat Poverty is planning to undertake a pilot study to implement poverty proofing with a number of local service providers. The outcomes will expectantly be a refined set of poverty proofing guidelines including a practical poverty impact assessment tool. This will build on previous work which has been undertaken by Combat Poverty with a number of Local Authorities in order to develop local poverty profiles, indicators and an understanding of the social dimension of local authority areas.

We anticipate that this current review of poverty proofing will assist us in developing a suitable template for local service providers and will contribute to the development of Local Anti-Poverty Strategies for Local Authorities.

Recommendation

B(vi) To use the current review to inform Combat Poverty's **pilot study** on the delivery of poverty proofing at a **local level**.

4.3 Resources & Training

Additional resources are required to ensure that poverty proofing is effectively implemented. We concur with NESC's recommendation to "enhance resources and training" and hope that the current review will acknowledge the importance of resources and assess the costs/ benefits of a poverty proofing exercise. The main resources required are personnel, to undertake policy analysis of proofing as per 4.2.1 and training of policy analysts to a high level to undertake this work. Also to undertake a level of training and awareness raising with all civil and public servants.

Recommendation

B(vii) To ensure the commitment of **resources** as it is necessary for Departments to have the appropriate **skills and knowledge** in the area of poverty reduction.

4.4 Legislation

In the review of poverty proofing consideration should be given to placing it on a legislation basis. This would be appropriate under the TOR Objective 8, when reviewing other national and international situations e.g. Environmental Impact Assessments regulated by the Environmental Protection Agency, Section 75 in Northern Ireland which requires "public authorities in carrying

out their functions to have due regard to the need to promote equality of opportunity”⁷ and the French Rights-Based legislation where there are two relevant laws for social cohesion – the law on the fight against social exclusion and the law on programmes for social cohesion. Consideration could be given to whether it might be appropriate for Combat Poverty to fulfill a regulatory function in this regard.

Recommendation

B(viii) To consider **legalisation** which sets out poverty proofing as a requirement to policy design and implementation and have a regulatory body, such as Combat Poverty, to ensure compliance.

4.5 Transparency

In order to enhance greater transparency of policy development, Combat Poverty, recommends that policies which are proofed should be made publicly available through a central source i.e. website. The NESG review also notes this, as it recommends that “a commitment to transparency must be an integral element of the poverty impact assessment process. The basis on which decisions are reached must be clearly specified and should be readily accessible to members of the public”.

Recommendation

B(ix) To enhance **greater transparency** by ensuring that proofing documentation is made publicly available through central sources i.e. websites.

5. Best Practice

5.1 Overview

In reviewing policy processes it is useful to draw on examples where poverty proofing has taken place and to draw elements of best practice approach from these examples. We have highlighted one example of good practice in this submission paper.

5.2 National Budget

The poverty proofing exercise undertaken by the Department of Finance in the Budget documentation is an example of good practice. Since 2001, the Department of Finance have

⁷ Department of Trade and Industry, Equality Scheme, Section 75 Northern Ireland Act, 1998

included a statement in the Budget titled “Examination of the Budget using the National Anti-Poverty Strategy Guidelines” (i.e. the current poverty proofing guidelines).

The Budget documentation provides an analysis for the impact of income tax changes. For example the 2004 Budget statement (presented in Annex B) outlines the primary objective of the income tax measures and highlights how the measures:

- help prevent people falling into poverty;
- ameliorate/decreases (or increases) the effects of poverty;
- contribute to the achievement of the NAPS targets;
- reach the target groups.

It presents the rationale and basis of the assessment and outlines what changes might be introduced to change the effect on poverty.

In response to the Budget statement, Combat Poverty undertakes an analysis of the Budget on an annual basis, examining the measures introduced by the Budget and assessing the impact of tax/welfare changes on income distribution and poverty.

This is a useful overall approach to assessing the impact of the Budget on poverty and could usefully be undertaken in relation to other areas of the Budget, as well as for the income tax measures. Also evidence of changes made as a result of the poverty proofing process would be useful.

Combat Poverty would recommend the review to examine the budgetary statements on poverty proofing since 2001 and Combat Poverty’s post- Budget analysis as part of the review, to note the change in policy developments and to comment how this can be progressed further.

Recommendation

B(x) To examine the **Budgetary statements** on poverty proofing since 2001 and Combat Poverty’s **post- Budget analysis** as part of the review, to assess this as a ‘**good practice**’ approach, to note the change in policy developments and to comment how this can be progressed further.

6. Summary of Key Recommendations

In conclusion we welcome the Office for Social Inclusion’s review to develop the poverty proofing process. We believe that poverty proofing needs to be developed conceptually and at a practical application level. Throughout the submission we have outlined a number of principles that can

inform the review and in addition we have highlighted a number of recommendations, which should be considered. These are listed below.

A. Conceptual

At a conceptual level we purpose to:

- i. revisit and revise the **purpose** of poverty proofing and related **objectives**, taking account of the National Anti-Poverty Strategy and the National Action Plan on poverty and social exclusion (**NAPS&NAP/Inclusion**);
- ii. encourage the use of poverty proofing to make progress towards achievement of the **NAPS/NAPIncl targets**;
- iii. put in place a **communication strategy** to inform policy makers of NAPS and poverty proofing;
- iv. ensure policy proofing and poverty proofing in particular has a methodology in place to deal with **competing policy priorities**;
- v. ensure the development of **data sources** and **performance indicators** which can inform the assessment process;
- vi. encourage **consultation** at all levels for policy development and implementation and to draw upon current structures which are already in place to facilitate the **involvement of people experiencing poverty** in the policy process e.g. Community Forums and County & City Development Boards;
- vii. embed **monitoring** and **evaluation** processes in the poverty proofing procedure.

B. Practical

At a practical level we propose to:

- i. revise the **guidelines** to present a more streamlined approach to poverty proofing as suggested in the NESC review;
- ii. **categorise policies** at the pre-assessment screening stage and develop appropriate guidelines for the various policy categories;

- iii. tailor the guidelines in order to take account of the various **types of policy documentation** e.g. plans, proposals, legislation etc.
- iv. assess the findings from the **Integrated Proofing Pilot Project** in order to consider the possibility of **integrating poverty proofing** with other types of proofing;
- v. consider various **proofing approaches**, in particular, the suggested option of having skilled policy proofing experts in Departments, who would have the responsibility of delivering proofing processes;
- vi. use the current review to inform Combat Poverty's **pilot study** on the delivery of poverty proofing at a **local level**;
- vii. ensure the commitment of **resources** as it is necessary for Departments to have the appropriate **skills and knowledge** in the area of poverty reduction;
- viii. consider **legalisation** which sets out poverty proofing as a requirement to policy design and implementation and have a regulatory body, such as Combat Poverty, to ensure compliance;
- ix. enhance **greater transparency** by ensuring that proofing documentation is made publicly available through central sources i.e. websites;
- x. examine the **Budgetary statements** on poverty proofing since 2001 and Combat Poverty's **post- Budget analysis** as part of the review, to assess this as a '**good practice**' approach, to note the change in policy developments and to comment how this can be progressed further.

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