

Report on	Draft Consultation Response to the following consultations: <ul style="list-style-type: none"> • DEARA's consultation on Bovine TB • Northern Trust's consultation, 'how we propose to purchase domiciliary care provided by non-statutory providers' • Department of Finance Paper on Northern Ireland Budgetary Outlook 2018-2020
Reporting Officers	Philip Moffett, Head of Democratic Services Mark Kelso, Director of Public Health & Infrastructure JJ Tohill, Director Finance
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Is this report restricted for confidential business?	Yes	
If 'Yes', confirm below the exempt information category relied upon	No	x

1.0	Purpose of Report
1.1	<p>To inform members of the consultation response developed on behalf of Mid Ulster District Council in response to the following consultations:</p> <ul style="list-style-type: none"> • DEARA's consultation on Bovine TB-Eradication of bovine tuberculosis (bTB) • Northern Trust's consultation, 'how we propose to purchase domiciliary care provided by non-statutory providers' • Department of Finance Paper on Northern Ireland Budgetary Outlook 2018-2020
2.0	Background
2.1	Members were informed of the above consultation at December Full Council. Members requested that consultation responses were developed on behalf of Council.
3.0	Main Report
3.1	<p>DEARA's consultation on Bovine TB-Eradication of bovine tuberculosis (bTB)</p> <p>This consultation response details Council's concerns in relation to the proposed financial implications of the proposals. It is also pointed out that it is unrealistic to expect farmers to pay for TB testing. The Department were also urged to explore suitable solutions to the link between wildlife and the spread of bTB. The response is attached as Appendix A.</p>
3.2	<p>Northern Trust's consultation, 'how we propose to purchase domiciliary care provided by non-statutory providers'</p> <p>In this response Council the Trust was urged to ensure that the key priorities identified by the service users be embraced and championed by the service delivery providers who are awarded the contract. Responses to specific questions in relation to; the preferred model for purchasing, geographical breakdown of services, equality screening and rural impact assessment. The response is attached as Appendix B.</p>

3.3	<p>Department of Finance Briefing Paper on Northern Ireland Budgetary Outlook 2018-2020</p> <p>The Department of Finance published a briefing paper on the broad strategic issues that will help inform decisions on a Northern Ireland Budget for 2018-19 and 2019-20 (and 2020-21 for Capital). This was produced by the Department in the absence of Ministers and includes information on the major issues they have identified and will need to be addressed before a Budget can be agreed. The Briefing Document sets out a number of scenarios, although the Department states that they are not proposed budget settlements and no decisions have been made. The Departments states that the scenarios are to illustrate the kinds of choices that will need to be considered by Ministers in reaching agreement on a Budget. Suggested feedback from the Council is provided as Appendix C to this report.</p>
4.0	Other Considerations
4.1	<p><u>Financial & Human Resources Implications</u></p> <p>Financial: N/A</p> <p>Human: N/A</p>
4.2	<p><u>Equality and Good Relations Implications</u></p> <p>N/A</p>
4.3	<p><u>Risk Management Implications</u></p> <p>N/A</p>
5.0	Recommendation(s)
5.1	That members consider, comment as necessary and approve the draft responses for submission.
6.0	Documents Attached & References
6.1	<p>Appendix A: Mid Ulster District Council's draft response to the DEARA's consultation on Bovine TB</p> <p>Appendix B: Mid Ulster District Council's draft response to Northern Trust, 'how we propose to purchase domiciliary care provided by non-statutory providers</p> <p>Appendix C: Mid Ulster District Council feedback to the Department of Finance Briefing Paper on Northern Ireland Budgetary Outlook 2018-2020</p>

3 January 2018

Bovine TB Consultation

bTB Branch, Animal Health and Welfare Policy Division
Department of Agriculture, Environment and Rural Affairs
Room 714 Dundonald House
Upper Newtownards Road
Ballymiscaw
Belfast, BT4 3SB

Ref: Bovine TB Consultation- Eradication of bovine tuberculosis (bTB)

To whom it may concern:

Mid Ulster District Council would like to take this opportunity to put forward its views and concerns in relation to the proposals detailed in the above mentioned consultation. Council agrees with the Department of Agriculture, Environment and Rural Affairs (DEARA) that it is necessary to find a solution to support the eradication of bovine tuberculosis (bTB).

The spread of bTB has become more than evident within Mid Ulster District in recent times. It was previously a district least effected by TB in Northern Ireland but unfortunately this is no longer the case. Councillors have been made aware of farm businesses within our District where animals had to be destroyed due to bTB. This includes one herd in the Dungannon area losing 56 head of cattle. Council therefore fully supports the eradication of bovine tuberculosis (bTB) and recognises that it is one of the most difficult challenges facing the agriculture industry. It is clear that it

has a devastating impact on many individual farm businesses and livelihoods, presenting a huge threat to the industry overall. Therefore, Council urges the Department to move on this important issue due to the fear and concern amongst the farming community created by the fall in herd numbers from TB. Council does have concerns about some of the suggestions proposed by this consultation. These concerns are, in the main, linked to the capping of the payment for destroyed livestock which have contracted bTB together with the proposal that additional costs be met by farmers. The introduction of an additional cost to farmers compounded by implications of a reduction in financial compensation would create an added financial burden for farm businesses. As such, the Council is of the view that it is not realistic to expect farmers to pay to have cattle tested for bovine tuberculosis.

Also, farmers have frequently pointed out that there is little point in tackling TB in cattle if it is not simultaneously addressed in wildlife. Given the link between badgers and the spread of bTB, the Council would support further consultation in order to identify the best way to address the culling of badgers. While it is recognised that there are negatives with badger culling, there have also been positives associated with this course of action. This includes in the Republic of Ireland where badger culling was linked to a 40% decrease in the instances of bTB. Conservationists have argued against a culling that would see healthy badgers put down. They've also said that a cull causes badgers to move to other areas, effectively spreading the problem. However, Council is aware of studies carried out in the Banbridge and Sixmilecross areas. Council would urge the Department to evaluate the outcome of these studies and identify the potential for identifying badgers, culling those infected with TB and inoculating those not.

It is clear that the cost of TB (estimated to be in the region of £40m per year) is unsustainable and as such Mid Ulster District Council is supportive of the Department attempting to find a workable solution to reducing these costs. However it is clear that the measures identified within this consultation would have a deeply detrimental financial impact on the livestock industry. It is therefore important for the Department to note that Council would suggest maintaining the current financial

processes that currently exist for farmers. Available resources should be used to reduce the spread of the disease which would in turn reduce the associated cost of providing compensation for animals lost to bTB as well as the cost of their slaughter and disposal.

In conclusion, it is evident that Bovine TB poses a huge risk to Northern Ireland's livestock industry, however it is Council's view that the proposed amendments will have a significantly negative impact on farmers and their livestock. It is clear that the industry has faced significant financial challenges in recent years and Members would like it noted that a long term solution should be sought to address the threats posed by bTB. Proposed changes should not be solely based on a cost-cutting approaches. Further consideration also needs to be given to the appropriate and effective action to reduce the overall instances of bTB. Council would also like to again reinforce the level of fear and concern that the proposed changes have generated amongst the farming community.

Finally, Council looks forward to receiving the information on any further consultations that may follow in relation to bTB, particularly in relation to solutions to the role that wildlife plays in the spread of TB.

Yours sincerely

9 January 2018

Equality Unit

Route Complex

8e Coleraine Road

Ballymoney

Co Antrim

BT53 6BP

**Ref: Northern Health & Social Care Trust-How We Propose to Purchase
Domiciliary Care Provided by Non-Statutory Providers**

To whom it may concern:

Mid Ulster District Council would like to take this opportunity to put forward its views and opinions in relation to how the Trust proposes to Purchase Domiciliary Care Provided by Non-Statutory Providers for the Northern Trust area.

Council welcomes the fact that the Trust's proposals are informed by a service user consultation. Council would urge the Trust to ensure that the key priorities identified by the service users be embraced and championed by the service delivery providers who are awarded the contract. The fulfilment of the requests made by the service users will be paramount to the successful delivery of the contract. The key priorities identified include the following:

- Strong preference for care worker call times to be more consistent
- Strong preference for the care workers not to 'chop and change' – reinforcing continuity of care.

- The need for the service user to not feel rushed or hurried by the care worker.
- The need for improved communication between the care worker and the service user.
- The importance of adequate care worker training to better meet the individual needs of the service user.

The consultation questionnaire responses are each examined in turn below:

Question 1: Do you agree with the reasons and the need for change outlined in the document?

Council support this outlined change if it can guarantee that the change in provision will create a more equitable service delivered on a needs led basis. Council is also supportive of the implementation of longer term contracts assuming that this will decrease the associated administration and/or contract set up costs in comparison to doing so on an annual basis. Council supports this on the basis of ensuring overall better value for money in relation to the delivery of domiciliary care.

Question 2: Do you agree with the Trust's proposed model for purchasing services from non-statutory providers?

Council agrees that a model who can provide an equitable, flexible approach to the provision of domiciliary care would be most suitable.

Question 3: Do you agree with the creation of geographical areas or lots within the Trust area?

In relation to the Mid Ulster District Council it seems practical that Magherafelt and Cookstown would be placed in the same geographical areas/lots for service delivery. However, Council would seek assurance that given that some neighbouring areas in Cookstown are spilt between the Southern and Northern Trust areas, that a degree of flexibility would be available in emergency and/or exceptions circumstances. While Council understand that there may be complications in setting up such an understanding, in practical terms it is quite straightforward; vulnerable people in

close proximity to each other should all equitable levels of the care they require regardless of whether or not they fall into one Trust area or another.

Question 4: An outcome of initial equality screening considerations is available on the Trust website. Do you agree with the outcome of this screening?

Mid Ulster District Council would suggest that the changes to services detailed in this consultation has the potential to have a major impact on Section 75 groups and therefore may require an EQIA. This requirement should be identified via the 'on-going screening' that has been committed to by the Trust. Where adverse impact is identified the required mitigation should be communicated clearly to the effected group and the monitoring of the success of the mitigating measures should also be carried out.

Question 5: The Rural Needs Act NI 2016 places a duty on public authorities, including government departments, to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans and when designing and delivering public services. Do you have any evidence to suggest that the proposal within this document would create an adverse differential impact?

Mid Ulster District Council recognises the challenges of providing domiciliary care to patients who reside in rural areas. However as identified by the Trust via service user consultations the importance of consistency and continuity in the provision of domiciliary care has been highlighted. The commitment to providing high quality domiciliary services should be standard regardless of the whether the patient resides in an urban or rural area. Therefore patient outcomes should not be impacted upon as a result of the type of location they are resident in.

In general terms Mid Ulster District Council would like to express its concern at the reported delays in patients not being able to be discharged from hospital because of

the Trust's inability to provide appropriate care packages. The Council would hope that the proposals detailed in this consultation would allow for a more patient led approach to care and a greater focus on positive outcomes for patients who depend on domiciliary care as a vital part of their care packages.

Research has suggested that patients who have a supported return home after a hospital stay have much better health outcomes than patients who are subjected to much longer, sometimes unnecessary hospital stays. Therefore an improved process for the provision of domiciliary care should very much aim to improve the current challenges faced by many vulnerable people who rely on this practical support in order for them to remain in their own homes.

Finally, Council would also like to take this opportunity to remind the Trust that as stated in the consultation documentation; the care provided should not depend on the individual care worker, a high level of service delivery should be standard and received by all service users. Council wishes to thank you the NHSCT for the opportunity to respond to this important consultation and awaits the outcome of the consultation process.

Yours sincerely

XX January 2018

By email and first class post

Budgetary Outlook 2018/20
Room S1
Rathgael House
Balloo Road
BANGOR
BT19 7NA

Dear Sir,

Ref: Briefing on Northern Ireland Budgetary Outlook 2018-20

I refer to the Department of Finance's Briefing Paper on Northern Ireland Budgetary Outlook 2018-20 which was published on 18 December 2017.

Mid Ulster District Council (Council) welcomes the opportunity to respond to the consultation but notes with disappointment that the ability of other potential consultees to reply is likely to be severely compromised by the publication of the Briefing Paper immediately prior to Christmas.

Council recognises that the continued absence of the Assembly has created a difficult, if not that unusual dynamic, for the Civil Servants who are charged with taking such matters forward. However, it also notes that the Civil Service is a vastly experienced organisation who have an intimate knowledge of Northern Ireland's fiscal affairs, challenges and political dynamics. As such Council believes that the Civil Service has had sufficient time and resources to develop and produce a robust and informative Budgetary Outlook.

Unfortunately, however, if the Civil Service has indeed fully considered Northern Ireland's Budgetary Outlook, Council does not consider the Briefing Paper to be a sufficient distillation of the key facts, issues and potential options available to an incoming Executive to facilitate as meaningful a debate within the wider community and submission of informed responses as might otherwise be reasonably expected.

Alternatively, if the Briefing Paper is reflective of what could be considered to be a cursory and protectionist review of existing central government departmental programmes and pressures, Council would be highly critical of such an approach, which would offer little or nothing in terms of advancing the much needed transformation agenda within the Northern Ireland public service.

Notwithstanding Council's reservations as expressed above, the following response attempts to challenge the Civil Service to look again at the potential distribution of available financial resources with a view to ensuring that the aims of the Programme for Government (PfG) are realised for Northern Ireland's population on an equitable and transparent basis which will not appear to protect vested interests within existing departmental structures.

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Summary Response

Council is concerned to note that, despite reiterating on multiple occasions throughout the document “no decisions have yet been taken”, the Briefing Paper appears to suggest that the outworking of the ultimate budgetary process will be one of the three scenarios, none of which are presented in a context which confirms that the relevant departments have critically reviewed the current baseline expenditure.

The Northern Ireland fiscal environment has been perceived as challenging for a considerable period of time and it is hard to believe that the Civil Service has not anticipated a need to critically review its operations in advance of this stage of the current budget cycle. However, despite the structure and tone of the Briefing Paper suggesting that its preparation was co-ordinated and delivered to a template, the document lacks key financial information and comes across as protectionist in terms of potential impact on central government departments.

Broad choices

Council agrees that an incoming Executive will have three broad choices. However, it believes that the choices would be better stated as follows:

After reflecting on the aims of the PfG and the extent to which existing expenditure contributes to the delivery of desired outcomes, to:

1. Cut departmental allocations and allow the Departments to manage the consequences as they deem appropriate;
2. Cut departmental allocations and introduce a framework within which the Departments are challenged to deliver the desired outcomes; and
3. Cut departmental allocations but mitigate the effect of same by providing the Departments with an incentive to introduce both cost saving and income generation measures which are consistent and congruent with the aims of the PfG and introduce a framework within which the Departments are challenged to deliver the desired outcomes.

Council does **not** believe that the Departments should take associated decisions independently. The PfG aims are inter-related and interdependent and it would be naïve to think that expedient cost saving measures in one department could not impact disproportionately on the PfG.

Resource DEL and Capital DEL

Council agrees that it is appropriate to consider the two budgets separately. However, Council would make the point that the two expenditure streams do impact on each other; in other words capital investment or lack of investment does have revenue consequences.

Council also agrees that Capital DEL must be allocated on a priority basis with contractual and health and safety projects being funded first. Flagship projects are of course important but they cannot supersede contractual commitments and health and safety issues.

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Centrally Held Budgets

Council notes that the consultation specifically seeks opinion in relation to centrally held budgets. However, these matters are out with Council's remit and this response is therefore silent in relation to same.

Corporation Tax

Council notes that the Briefing Paper largely ignores the introduction of devolved corporation tax. It considers this to be an appropriate approach as this matter is a complex issue and could yet be impacted by factors outside the Executive's control.

Balancing the Budget

Council is disappointed that the Briefing Paper is confusing in terms of how it communicates the Northern Ireland fiscal environment and the Departments' perceptions of how they might be impacted by the anticipated budgetary pressures.

In particular, it appears strange that, despite the "Assumptions Common to All Scenarios"¹ stating "the Resource budgets of the Department of Health and the Department of Education would be exempt from reductions", the Briefing Paper draws no further attention to this fact. Indeed the analysis of the implications of each of the three budget scenarios on both the Department of Health² (DH) and Education³ (DE) repeatedly emphasises that both departments will receive no uplift to address pay and price inflation while simultaneously downplaying the fact that neither department will face any budget reductions. This is emotive and detracts from the fact that **all** public bodies, and not just central government departments, will face inflationary pay and price pressures in the relevant years.

The criticism (above) of the repeated emphasis of pay and price inflation pressures is equally applicable to each of the other departments' analysis of the implications of each of the three budget scenarios on them. The repeated suggestion that existing payroll and running costs must be protected reflects badly on how much effort the relevant departments have expended in considering the absorption of inflationary pressures or indeed the transformation of their service delivery models to become more efficient. Council's opinion is that PfG outcomes could be better delivered by applying the limited resources to key services and funding streams as opposed to protecting departmental payroll and goods and services budgets.

Notwithstanding the above, Council is particularly dismayed by the fact that the Briefing Paper is drafted in a manner which scaremongers by foretelling emotive events such as:

- Deferring planned expenditure in respect of the TB Strategic Partnership Group and Sustainable Agricultural Land Management Strategy (Department of Agriculture, Environment and Rural Affairs (DAERA));
- Scaling back existing Rural Development and Environmental programmes (DAERA);
- Cessation of all Rural Affairs programmes (DAERA);
- Delay of core programmes, including CAP (DAERA);
- Failing to meet commitments in relation to breaking cycles of deprivation, reducing anti-social behaviour and increasing civic participation (Department for Communities (DfC));

¹ Page 41 of Briefing Paper

² Pages 72 to 77 of Briefing Paper

³ Pages 64 to 66 of the Briefing Paper

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- Cuts to funding of Arms-Length Bodies and Rates Support Grant (DfC);
- Amendment of legislation to stop Grant programmes (DfC);
- Reduction in, if not elimination of, the current level of skills programmes, which is couched in terms of “damaging the employment prospects of thousands of the most risk disadvantaged young people particularly when the skill of our workforce is going to become increasingly important for our economic growth and social inclusion” (Department for the Economy (DfE));
- Potential cessation of support for Post Graduate Studentships (DfE);
- Potential reductions in support to Invest NI and Tourism NI “reversing any gain of the last few years” (DfE); and
- Reductions to the funding of Early Years and Youth Services (DfE)

while patently failing to demonstrate that the various departments have subjected their existing payroll and other expenditure to appropriate scrutiny with a view to identifying and implementing proportionate cost saving and/or income generation measures.

Council notes that the Department of Finance (DF) with 12% (£17.124m) and in excess of 70% (£99.89m) of its budget (£142.7m in 2017/18) currently allocated to “providing strategic finance, policy and statistical services to central government” and “delivering shared services to the public sector” appears to perceive itself above identifying, let alone implementing any potential reduction to its existing budget. This is very disappointing.

Council also notes that, although the DF perceives its ability to maximise regional and rate collection is directly related to the level of funding available for managing this service, the Briefing Paper neither quantifies the current cost, payroll or otherwise, of this apparently noteworthy service nor acknowledges that local government, if not central government, pays for the collection service via a top slicing of its Rate income. Council is uncertain what to make of the DF’s disclosure in the Briefing Paper; is it merely a poorly drafted commentary or is it an attempt to unsettle district councils that the DF incorrectly assumes do not understand the financial costs to them of the Rate collection process?

The Briefing Paper also goes to great lengths to emphasise the DF’s allocation of in excess of 70% of its expenditure to the delivery of shared services across the public sector. Council does not understand why the DF appear to suggest that approximately £99.89m (in 2017/18 terms) is incapable of efficiency or rationalisation without serious threat to the delivery of anticipated shared service outcomes. Equally, Council notes the DF’s comments which advise that its digital transformation agenda but wonders why this Department, of all departments, appears to consider that it cannot cut any budgets because it is investing in its IT systems. Council is confident that, in reviewing and considering loan applications for similar projects being proposed by district councils, if not other public sector bodies, the DF will be familiar with the concept of spend to save. Given the governance and risk management arrangements in place for district councils and it is assumed other public bodies, it seems incredible that the DF is unable to make a business case to support the replacement/upgrade of its IT systems which will enable it to also contribute to the management of the current budgetary pressures faced by the Assembly in a meaningful and responsible way.

Council also queries why the DF appears to consider that its participation in the implementation of the reform of property management must be funded from within its baseline budgets. This is similar to the replacement/upgrade of the IT systems and surely the costs of same will be significantly outweighed by the future anticipated benefits.

Although the DH appears to have strayed slightly from the template that the other departments appear to have followed, it also appears to be convinced that it should not be expected to at least attempt to absorb some of its pressures. Council accepts that it,

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together with the DE, is a demand led service facing which is facing challenging times but surely it is inexcusable for the Department to specifically quote the pressure of the “revenue consequences of capital expenditure” as a pressure when the associated business cases, assuming that they were adequate, must have flagged these costs up long before the capital projects were commissioned? Equally, Council wonders if the stated “workforce pressures as a result of recent increases in GP training numbers and increases in pre-registration nurse education” could not have been at least mitigated if cost saving measures in earlier years had not sought to reduce these numbers. Most disappointing, however, in relation to the DH is the tone of its suggestion that elective care and associated waiting lists will again be cut despite, as noted above, the stated assumption that “the Resource budgets of the Department of Health and the Department of Education would be exempt from reductions”. Council simply is unclear as to whether the author within the DH understood this assumption or whether the reference to elective care is intended to be as emotive as possible. Either way, Council is disappointed by the reference in the absence of any meaningful financial analysis to support same. Similarly, Council notes the explicit enunciation of the prognosis for community care services.

The commentary provided by the Department for Infrastructure (DfI) is equally depressing. Council, in particular, finds it difficult to understand how Translink has been allowed to sustain annual losses of “around £13 million” since the reduction in the subsidy for bus and rail services in 2014/15. Council’s incredulity is exacerbated by the Briefing Paper advising “these losses have been covered by drawing on their reserves but there is limited capacity for this to continue beyond the 2019/20 financial year”. This is simply incredible and Council must ask if the text is erroneous and, if not, enquire as to what level of scrutiny Translink’s operating and financial performance has been subject to since 2014/15. Surely the Civil Service, either the DfI, Northern Ireland Audit Office or the Executive Office has noted this performance and sought to implement an appropriate action plan to address the situation? Council notes that the DfI appears to suggest that its contractual commitments to Public Private Partnership (PPP) contracts are so onerous that they will effectively consume a very significant proportion of its available funds to the detriment of most other services. As such, and noting similar sentiments within the DfI’s comments in relation to the Roads Resource budget, Council again wonders what level of scrutiny has been afforded to these arrangements and whether appropriate lessons have been learned for the future.

The prognosis for NI Water is starkly stated. However, although Council, with no statutory responsibility for the supply of water and sewerage services in Northern Ireland, has a only a very limited knowledge of the pressures that NI Water face and the detail of the scrutiny applied by the Utility Regulator, it does note that the Utility Regulator’s Final Price Control Determination for the period 2015 to 2021 (PC15) stated “benchmarking information shows that NI Water is 22% less efficient than similar companies in England and Wales and spends £1.27 for every £1 spent by the more efficient companies. The UR has challenged NI Water to reduce their efficiency gap and deliver 2.3% per annum efficiency savings over PC15, saving the consumer £47m in 2012-13 prices”. Although the Utility Regulator’s Chief Executive at the time stated “As NI Water is partly funded by Government subsidy, any reductions in public expenditure allocations may impact on the implementation of the price control determination”, Council notes that PC15 challenged NI Water to improve efficiency by delivering “11.5% real terms reduction in total operating expenditure by 2021 - building upon improved efficiency achieved within our (the Utility Regulator’s) first two price controls”. In the light of this, Council would suggest that the stark prognosis would be better balanced if the DfI had included within its commentary some detail in relation to how NI Water was progressing towards the challenge set by the Utility Regulator.

Notwithstanding Council’s comments above in relation to the DfI’s statements about its commitments to PPP contracts associated with Roads, Council is shocked by the almost ‘nuclear winter’ scenarios presented in relation to future street lighting provision, grass

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cutting, gully emptying, pothole repairs and Winter salting and road clearance. Although, given the lack of a comprehensive financial analysis of the situation, it is impossible to take an informed view on the scenarios presented, Council can only state that, from a layman's perspective, if management of Roads Resource DEL has resulted in the anticipation of the need to protect payroll and other lesser budgets to the exclusion of all significant public services, it is a sad day for the DfL.

Council is also disappointed by the DfL's simple assertion that the scenarios presented within the Briefing Paper are likely to result in "reductions/cessation in services to the disabled and those in rural areas" without any indication of what efficiencies the Rural and Community Transport service area have anticipated making to mitigate these outcomes.

As regards the other departments referenced in the Briefing Paper Council would merely take the opportunity to note the Department of Justice's statement "reductions to budgets would impact significantly on the work and speed of legacy investigations in PSNI and the Police Ombudsman's historic investigation and legacy investigations in the Coroners Service." In this regard Council would enquire if, given the limited progression of these investigations, there have been underspends to date and, if so, how they were applied within the quarterly monitoring rounds.

Conclusion

Council is disappointed in the tone and content of the Briefing Paper which has been released for consultation. Notwithstanding its release immediately prior to Christmas, which is likely to impact on the ability of other potential consultees to reply, Council considers the Briefing Paper to be unprofessional in its contents insofar as it lacks useful relevant financial information to support the doomsday nature of its basic message and tends to suggest that departmental payroll and other internal budgets must be protected in all circumstances.

Council is also disappointed to interpret the purpose of the consultation as being to pave the way for defending whatever budgetary position is adopted on the basis that no useful response was received to the specific questions asked, none of which Council has chosen to reply to directly. It is Council's opinion that the consultation is brutish and serves no useful purpose.

Council would therefore suggest that the Civil Service resurrect whatever detailed analysis underpins the Briefing Paper to ensure that appropriate scrutiny of existing budgets has been undertaken in advance of the restoration of an Assembly. In doing so, Council would urge that the Civil Service reflect on the fact that they are public servants who are challenged to support the Assembly in the delivery of an equitable and transparent budget. In particular, Council would urge the Civil Service to also reflect on the rationale for the Rate Support Grant (RSG) and the impact that any reduction thereto would have on the less affluent district councils who, in the absence of an Assembly, have continued to provide statutory services to all sections of society. In Council's opinion, it would simply be a travesty for the RSG to be reduced and this must be avoided at all costs.

I appreciate that the reader may be dismayed by the bluntness of this response. However, Council takes its responsibility to its rate payers seriously and the points made in this reply reflect Council's very real disappointment in the Briefing Paper.

I trust that you will share this correspondence with all interested parties.

Yours faithfully,