

**Northern Ireland Council  
for Ethnic Minorities  
(NICEM)**

**Submission to  
the Northern Ireland Office  
in consideration of  
the Department of Education  
on  
Policy on supporting ethnic-  
minority children and  
young people who  
have English as an  
additional language**

**1 May 2007**

## **1. Introduction**

1.1 NICEM is an umbrella organisation representing the interests of black and minority ethnic groups in Northern Ireland. Currently we have 23 affiliated black and minority ethnic groups as our full member, which represents most of the black and ethnic minority communities in Northern Ireland. Our vision is of a society where differences are recognised, respected and valued, a society free from all forms of racism and discrimination, where human rights are guaranteed. NICEM works in partnership, to bring about social change, by achieving equality of outcome and full participation in society.

1.2 NICEM welcome the Department's initiative to set up the draft "Policy on supporting ethnic-minority children and young people who have English as additional language" which is the document for the purpose of this consultation. The main purpose of this Policy is to set up a regional Ethnic Minority Achievement Service (EMAS). **In viewing the current government policy on the Racial Equality Strategy for Northern Ireland 2005-2010 and the requirement of the Action Plan from individual Department, it will be more at strategic level to develop Policy on Ethnic Minority Achievement Service instead and EAL and Travellers' Special Education needs will be the key components of it.** It will not be too late for the Department to do it now and then EAL Policy will be subsumed to it. (see appendix on the proposed aims and policy statement of the "Ethnic Minority Achievement Policy")

1.3 NICEM makes it clear that the provision of EAL (both quality and quantity) will affect the academic achievement of minority ethnic student, which in turn will affect their career future (both higher and further education and the opportunity for open employment). The recent data from the Good Relations Baseline Data Report showed that 6.4 % of minority ethnic people left school without any qualification (compare with 5% of the local population). **If the Department does not do it right at this stage (forget about the past that the Department does not have any policy at all), it will create a structural discrimination against minority ethnic people in Northern Ireland.**

1.4 In this submission we highlights the fact that this consultation through the Departments' Response Questionnaire is not only restrictive, but also mislead the people to tick the box on the limited areas which is not for the purpose of policy comments. **This is reflected in the questionnaire which gives no scope for informed debate on the policu issues facing teachers with and without EAL teaching skills. In our view the so-called draft Policy document has no contents in relation to the EAL Policy per se instead focus on the Ethnic Minority Achievement Service and other related issues with parents. It confuses everyone on the sole purpose of this consultation. (see 2.1.6 and 2.1.7 below for details)** Therefore our submission is in two parts: first part deals with the policy issues arising from the draft "Policy on supporting ethnic-minority children and young people who have English as an additional language"; the second part deals with the response questionnaire. **The Department cannot choose and pick the second part without refers to the policy issues in the important first part of this submission.**

## **2. General Comments on the draft Policy Document**

### **2.1 Background**

2.1.1 NICEM appreciates that a considerable amount of background research has been carried out by Price Waterhouse Coopers (PWC) and their reports are very informative. These together with the Inspectorate's 2006 report are useful in identifying the good work which has been going on in schools across the Province and the experience which has been built up by the professionals working in the Education and Library Boards over the years. They also highlight the areas where change or additional expertise is required.

2.1.2 Bearing in mind the expertise already available in Northern Ireland, **it was surprising that there was in the draft policy document no significant reference to or acknowledgment of this or of the research existing prior to the PWC work or the Equality Commission's Racial Equality in Education Good Practice Guidelines issued in 2001.** The draft policy refers several times to being based on "best practice" but does not clarify what this is or how the policy represents this. Furthermore, the draft policy has a number of references to the importance of carrying out future research to determine what constitutes good practice in this area.

2.1.3 Northern Ireland has come lately to many of the issues raised by a large influx to schools of ethnic minority children. **The OFMDFM's Practical Guide to Policy Making makes it quite clear that, not only must a new policy be evidence based but so also must it draw from the experience of other jurisdictions. Little cognisance appears to have been taken of developments and lessons learned in England and Wales over the years which have fed into the "Aiming High" policy regarding the achievement of ethnic minority children. It is vital that the EMAS is not burdened with endeavouring to carry out research and re-invent programmes and procedures which are already in place and working elsewhere.**

2.1.4 The OFMDFM Policy Making guide also requires policy makers to take a "cross cutting" and "joined up" approach which unfortunately is not apparent in the draft policy. EAL as a policy and the needs and rights of minority ethnic pupils need to be looked at not only in the area of race relations, human rights and providing equality of opportunity but also in the area of overall language planning for Northern Ireland in recognition of the valuable resources speakers of other languages can provide.

2.1.5 Other than acknowledging that there is an increase in the number of languages spoken in Northern Ireland **there is little recognition in the draft policy document of developing the EAL policy in a way which will complement the proposed Languages Strategy for Northern Ireland.** Furthermore, developments in the context of extended or full service schools may also be relevant to EAL provision and the EMAS.

2.1.6 Whilst many of the issues faced by ethnic minority children and their parents are identified, **it is unclear whether the draft document is a policy on the teaching of English as an Additional Language (as had originally been intended) or a policy for improving the achievement of ethnic minority pupils whether or**

**not they need additional language support. Each is important for the overall improvement of the educational opportunities for these children and young people. There requires to be clarification of**

1. the more narrow issue of the determining what is the actual EAL policy and what are its aims and objectives and
2. the broader remit of the EMAS and its delivery of services (including EAL) to and support of ethnic minority pupils, their families and schools needs to set out clearly.

**2.1.7 This confusion of purpose is clear from the wording of the questions in the EIA as they largely relate to the EMAS and not to teaching of EAL per se. Furthermore, it is difficult to understand how a draft policy can be genuinely under consultation where the consultation period ends in May 2007 and one of the main proposals under consultation relates to a service which commenced operation on 1st April 2007. It is put the cart before the horse and we strongly question that it is in breach of s.75 duty.**

## **2.2 Substantial comments on each Section of the draft Policy document**

### **Section A**

1. In paragraph 1 it should be clarified that EAL is an academic subject to be taught and is not a label for children;
2. It would be helpful if the “main suggestions” clarified what relates to the teaching and provision of EAL and what relates to the management of the needs of ethnic minority children and facilitates their overall achievement, whether as a classroom or whole school issue. It may also be useful to explore the overlap (if any) with citizenship and the curriculum.

### **Section B**

1. In the context of education, the real relevance of the Race Relations Order (RRO) is that it specifically relates to the issue of “access” to services. The importance of the legislation is in its protection of the rights of minority ethnic pupils to have genuine access to education and adequate provision of English language support facilitates this.
2. On a point of information, the Human Rights Act does not bring the ECHR “into local law”. It gives people here the right to rely on the ECHR in our local courts rather than having to take their case to the European Court of Human Rights.
3. For accuracy it should perhaps be noted that paragraph 5 does not accurately reflect the legal position as the UK government entered a reservation restricting its obligation to respect parents’ wishes.
4. For information purposes it could be noted that s75 applies to Education and Library Boards and the Department but not, as yet, to Boards of Governors.

### **Section C**

1. **The aims relate mainly to the overall education needs and management of children whose first language is not English but there are no aims directed specifically to ensuring the availability of teachers who have the skills required in teaching EAL. Rather than incorporate the aims in the**

**Executive Summary** it would be useful to have aims and objectives regarding the EAL policy and aims and objectives of the EMAS set out in separately.

2. Paragraph 4 is drafted in terms of learning from what happens in due course rather than acknowledging and drawing on the knowledge base and skills already available. The monitoring and evaluating of any policy are of course important but identifying, acknowledging and harnessing the best practices already in place is both encouraging for and supportive of those already working in the field. **This section also fails to recognise the wisdom and extensive or recent experience of other education systems (eg Australia, England and Wales, the Republic of Ireland) which will be invaluable in developing EAL and the EMAS in Northern Ireland.**
3. In paragraph 7 opportunity could be taken to recognise the importance of an interdisciplinary and inter-professional approach to the education of ethnic minority children and to the problems faced by them and their families.

#### **Section D**

1. With respect, the “thinking behind the policy” is set out in a somewhat simplistic manner and lacks a depth of analysis of the issues facing the EAL services over the past few years including the many problems presented by the rapid growth in numbers and by the financial difficulties which arose in 2004/2005. To set the policies in context, it would be useful to have a brief overview of the development of EAL in Northern Ireland and how the system previously and currently works and the problems with which it is faced which have led to the recognition of a need for production of a formal EAL policy and ethnic minority achievement policy for schools. The clear move in 2005 from peripatetic support of children in the classroom to support of teachers from centre requires to be explained and justified.
2. Although there is some reference to the legislative background, the document does not set this proposed policies in the context of current government strategies, eg the Review of Public Administration, A Shared Future, the Racial Equality Strategy 2005-2010, the Bain Report and the proposed Languages Strategy for Northern Ireland.
3. Paragraphs 5 and 6 are again somewhat simplistic ignoring the very extensive literature on and research into the needs of children learning a second language, the benefits of bilingualism for the individual and for society and the appropriate and relevant education theories and practices. **There is no analysis of the purpose and role of EAL and skilled EAL teachers or recognition that it is a specific skill to be taught and acquired. No thorough consideration has been given to the respective merits and disadvantages of withdrawal of children for individual tuition or their immersion in the everyday life of the classroom. It is not appropriate for an EAL policy to say only that there are “different opinions about teaching English” and so different teaching methods should be used.**
4. Paragraph 14(a) begs the question – what is the new policy? Or no EAL policy at all save the provision of EMAS. The suggestions again relate to the management of ethnic minority pupils and their families and have little to do with the nuts and bolts of teaching EAL. This is reflected in

**the questionnaire which gives no scope for informed debate on the issues facing teachers with and without EAL teaching skills.**

5. If the point of 14(p) is to enhance the availability of bilingual support for eg children of migrant workers from other parts of Europe, this should be clarified.
6. Paragraph 14(r) – one would rather expect that a government department is itself responsible for ensuring that it follows relevant laws.
7. It is encouraging to note the increasing provision of interpreting and translating services for the pupils, families and schools. It is vital that this should not put any additional financial burden on schools or parents.
8. Paragraphs 22-24 – it is unfortunate that there is no recognition of the skills available at the Universities in the Province or of the contribution that they can make both to Initial Teacher Training and to early and continuing professional development. The University of Ulster, for example, is developing classes and courses on these areas.
9. The issue of recognition by the Department of TESOL/EAL qualifications needs to be acknowledged and addressed so that people with relevant skills can make a contribution to the development of EAL in the schools and that their contribution is appropriately remunerated.
10. Paragraphs 14(o) and 24 – evidence of good practice is readily available both within Northern Ireland and from other jurisdictions. What is required is a system of appropriate monitoring and evaluation of the outworking of the proposed policy.

#### **Section E**

**This is again drafted in terms that would suggest that assessment tools are not already in operation or readily available. Recognition needs to be given to the extensive expertise already available in the Province and in adjacent jurisdictions.**

#### **Section F**

1. It is not clear what is meant by “conditions” of educating pupils with EAL. Can the Department clarify it?
2. It would be useful to have an informed examination of the correlation or overlap between the rights and needs of ethnic minority pupils and their families, the needs of schools and the requirements of the curriculum including citizenship. It is hard to see how the section on admissions criteria in schools relates to an EAL policy or the EMAS and perhaps this could be clarified.

#### **Section G**

1. The first report of the Education and Training Inspectorate on EAL released in

**2006 gives a very useful insight into how EAL is being delivered and the problems facing schools dealing with the education of increasing numbers of ethnic minority pupils. One of the main areas of concerns which arose following the changes introduced by the introduction of the Common**

**Funding Formula is the lack of correlation between the funding of schools for EAL pupils and the delivery of services. If the Inspectorate's brief is to inspect the EMAS it begs the question of how the delivery of EAL is to be monitored and evaluated.**

**2. The Department should have a contract compliance clause under the Common**

**Funding Formula to the effect that if the school fails to provide the EAL service to the number of targets of minority ethnic pupils, the Department has the rights to claw back the resources available to the school.**

- 3. As a tax payer we are more concern on public accountability. If the school cannot deliver it is not for the public interests to continue to fund the school with the perception that they will deliver. It is a public scandal!**

**Section H**

- 1. The document is silent on the very real problems which arose in the education of ethnic minority pupils following the introduction of the Common Funding Formula in April 2005. It is important that opportunity is given for an open debate on the appropriate method of provision of services for ethnic minority pupils and, in particular, whether funds paid into school budgets should continue to be part of a global sum or whether they should be ring –fenced.**
- 2. Paragraph 9 - If schools are expected to spend the allocated money on support and services related to EAL there requires to be a full examination of how this is to be done and what the money can and cannot be spent on. This again raises the question of the recognition of TESOL qualifications and payment of those with the required EAL skills. There should also be provision for training of principals and Boards of Governors on issues relating to the education of minority ethnic pupils**
- 3. With the anticipated rise in numbers of children requiring EAL and EMAS support being at least 30% per year (para D3) then clearer guidance on the availability and use of contingency funds is required.**

**3. Conclusion**

In summary, it appears that **the proposed “Policy on supporting ethnic-minority children and young people who have English as an additional language” relates largely to the setting up and operation of a Ethnic Minority Achievement Service.** Such a development is encouraging provided that necessary resources are made available to permit it to operate in a comprehensive manner. It is to be hoped that such a service will make a valuable contribution to the education and well being of our ethnic minority children and young people and be of support to their families and schools.

**However, given the history of the development of EAL in Northern Ireland since 1990 and the problems which arose in 2005, it is vital that a specific policy for the delivery of EAL is formulated which takes into consideration the particular circumstances of Northern Ireland drawing on existing evidence of best practice here and in other jurisdictions.**

**In viewing the current government policy on the Racial Equality Strategy for Northern Ireland 2005-2010 and the requirement of the Action Plan from individual Department, it will be more at strategic level to develop Policy on Ethnic Minority Achievement Service and put EAL policy and Travellers' Special Education needs policy will be the key components of it. We would like to request the Department considers this option as part of their commitment to implement Action Plan for the purpose of the Racial Equality Strategy 2005-2010 and at the same time develop a real EAL policy as we raise our concerns and comments above.**

If you have any question about this submission, please do not hesitate to contact:

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**NICEM would like to acknowledge Ms. Anne Brown who assist NICEM to make this submission which is based on the consultation meeting for the sector in March 2007.**



#### **4. Response Questionnaire**

**Draft Response to Policy on Supporting Ethnic-Minority Children and Young People who have English as an Additional Language**

**Response Questionnaire on Policy on supporting ethnic-minority children and young people who have English as an additional language  
(including equality impact assessment)**

## **Ethnic Minority Achievement Service (EMAS)**

- (1) Do you agree with the Department establishing a regional Ethnic Minority Achievement Service (EMAS) to provide support for ethnic-minority children and young people who have English as an additional language?**

<b>Strongly Agree</b>	<b>Agree</b>	<b>No Strong Opinion</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
√				

**If you ‘Disagree’ or ‘Strongly Disagree’ please provide your reasons why and suggestions for improvement.**

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- (2) Do you agree with this service having regional teams of fully trained English as an additional language teachers and advisers?**

<b>Strongly Agree</b>	<b>Agree</b>	<b>No Strong Opinion</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
			√	

**If you ‘Disagree’ or ‘Strongly Disagree’ please provide your reasons why and suggestions for improvement.**

<ul style="list-style-type: none"><li>• This is a narrow definition of the role.</li><li>• There should be clarification of roles and responsibilities of all those working within the service.</li><li>• We do not envisage peripatetic teaching to be effective and sustainable in the long term (Section D Para 10). It may be more appropriate to place additional teachers in schools to support class teachers and pupil learning.</li></ul>
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**(3) Do you agree with the proposed responsibilities of the Ethnic Minority Achievement Service in relation to English as an additional language provision?**

Strongly Agree	Agree	No Strong Opinion	Disagree	Strongly Disagree
			√	

**If you ‘Disagree’ or ‘Strongly Disagree’ please provide your reasons why and suggestions for improvement.**

We disagree in part, and outline below areas of disagreement.

- Elements of the responsibilities, as outlined, illustrate a lack of understanding of the legislative responsibilities of ETI, Boards of Governors, schools, teachers and support authorities.
- The role of EMAS should be to deliver government policy rather than to “deal” with issues (Section D Para 11).
- Role of EMAS should be to determine the most effective strategies, roles and responsibilities for the effective implementation of DE policy.
- We disagree that it should be the responsibility of EMAS to the ‘check the information’ sent from schools (Section H Para 11). It is the responsibility of schools to complete census returns. Internal auditing procedures apply. (See attached document which outlines further the response of the ELBs).
- The professionalism of school staff and responsibilities of Boards of Governors and ETI are undermined in paragraphs 11 and 12 (Section H).
- It is not feasible that EMAS staff should produce software.
- We would support a fundamental review of the Common Formula Funding element of this policy.
- Please note additional comments section.
- Clarity required on ‘monitor the number of pupils who take part in language development’.

**Interpreting and translating documents**

**(4) Do you agree with the Department setting up an interpreting service for children and young people who have English as an additional language, their parents and schools to make use of?**

Strongly Agree	Agree	No Strong Opinion	Disagree	Strongly Disagree
√				

**If you ‘Disagree’ or ‘Strongly Disagree’ please provide your reasons why and suggestions for improvement.**

- Such a service should be funded by DE and operationalised by EMAS.

- (5) Do you agree with the Department setting up a translating of documents service for schools to make use of?

Strongly Agree	Agree	No Strong Opinion	Disagree	Strongly Disagree
√				

If you 'Disagree' or 'Strongly Disagree' please provide your reasons why and suggestions for improvement.

- Such a service should be funded by DE and operationalised by EMAS.

### Information for parents

- (6) Do you agree with the development of standard welcome packs for parents of children and young people who have English as an additional language, to provide practical information about the Northern Ireland school system and curriculum in the relevant mother tongue?

Strongly Agree	Agree	No Strong Opinion	Disagree	Strongly Disagree
				√

If you 'Disagree' or 'Strongly Disagree' please provide your reasons why and suggestions for improvement.

- The production of hard copy packs for parents is not cost-effective.
- It can be more cost-effective through information session for the minority ethnic parents with interpreters provided at the information session.
- This function may also be met by the setting up of the regional multi-lingual educational information website.

- (7) Do you agree that one of the best ways to communicate with parents of children and young people who have English as an additional language is to set up a website which will contain important school documents translated into various languages?

Strongly Agree	Agree	No Strong Opinion	Disagree	Strongly Disagree
			X	

If you 'Disagree' or 'Strongly Disagree' please provide your reasons why and suggestions for improvement.

- Partly disagree. The Department should understand that not all parents are IT literate. The website can be one of many other options, but not the only option in terms of communication.

Bear in mind, too, communication is a both way communication. Website is a one way traffic!

### **Training and curriculum support**

- (8) Do you agree that the Ethnic Minority Achievement Service will be responsible for the continuous professional development of all education professionals in schools, in all aspects of English as an additional language awareness?

<b>Strongly Agree</b>	<b>Agree</b>	<b>No Strong Opinion</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
√				

If you 'Disagree' or 'Strongly Disagree' please provide your reasons why and suggestions for improvement.

- Professional development for school staff should support all aspects of ethnic minority achievement including English as an Additional Language.

### **Assessment**

- (9) Do you agree that a single assessment tool should be created and used to individually assess the English skills of each pupil who has English as an additional language on enrolment into school?

<b>Strongly Agree</b>	<b>Agree</b>	<b>No Strong Opinion</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
	√			

If you 'Disagree' or 'Strongly Disagree' please provide your reasons why and suggestions for improvement.

- The statement demonstrates a lack of understanding of the complexity of the process.

## Section 75

- (10) Do you think any of the recommendations discussed would have any adverse impact on equality of opportunity and/or good relations for any of the categories listed below?

Please tick 'Yes' or 'No' beside the relevant group.

Category	Examples of Group	Yes	No
Age	Those under 18; People aged between 18 and 65; People over 65	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marital status	Married people; Unmarried people; Divorced or separated people; Widowed people	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gender	Men and women generally; Transgendered people; Transsexual people	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disability	Person with a disability as defined in the Disability Discrimination Act 1995	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Dependants	Person with primary responsibility for care of a child; person with a disability or dependent elderly person	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Political opinion	Unionists generally; Nationalists generally; Members/supporters of any other Political party	<input type="checkbox"/>	<input type="checkbox"/>
Racial group	Chinese; Irish Traveller; Indian; Pakistani; Bangladeshi; Black African; Black Caribbean; Mixed ethnic group; Any other ethnic group/nationality	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religious belief	Catholic; Protestant; Hindu; Jewish; Muslim; Sikh; Buddhist; Other religion; No religious belief	<input type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	Gay; Lesbian; Bisexual; Heterosexual	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

**If you answered ‘Yes’ to any of the Section 75 categories, please outline the issues you feel would adversely impact on that category.**

- The policy does not address issues such as cultural awareness or school ethos.

**Please indicate how you feel these adverse impacts could be reduced or alleviated.**

- By extending the focus of the policy to include ethnic minority achievement including EAL.

**If you believe such adverse impacts cannot be reduced or alleviated, can you suggest alternative proposals, which might reduce the differential impact on the category you have mentioned?**

**Any other comments you wish to make regarding the policy to provide support to ethnic-minority children and young people who have English as an additional language would be greatly appreciated. (Please attach any additional sheets if necessary).**

#### **The Distinctiveness of EAL**

Pupils learning English as an Additional Language (EAL) share many common characteristics with pupils whose first language is English, and many of their needs are similar to those of other children and young people learning in our schools. However, EAL pupils also have distinct and different needs from other pupils. The most significant distinction is that they are learning through a language other than their first language, and that they come from backgrounds and communities with different understandings and expectations of education, language and learning. It is important to recognise that all EAL pupils are not one homogeneous group.

#### **The Development of Language Acquisition**

Language development needs are often masked by competence in oral language. Research has shown that pupils may take up to 2 to 3 years to develop survival/playground English. This conversational fluency is described as Basic Interpersonal Skills (BICS). It takes between 5 and 7 years for EAL pupils to operate on par with their monolingual peers. However, it may take longer to become proficient in using academic English, which is described as Cognitive Academic Language Proficiency (CALP) (Cummins J 1986).

#### **The Importance of First Language**

Research evidence shows that bilingualism has a positive effect on intellectual performance. Pupils learning EAL are already proficient in one or more other languages. They are able to transfer their linguistic and cognitive skills from one language to another. This reinforces the importance of continuous development in the first language for pupils while they are learning an additional language.

EAL pupils will make greater progress if they are aware that their knowledge of their first language is valued and that schools respect their cultural and religious traditions.

## **APPENDIX**

### **The Ethnic Minority Achievement Policy Aims:**

- **Address the educational needs of minority ethnic pupils;**
- **Raising standards for minority ethnic pupil achievement;**
- **Assist schools to provide minority ethnic pupils with enhanced access to the whole school curriculum;**
- **Ensure teaching professional achieve a greater understanding, knowledge and skills of the stages of language acquisition through which bilingual learners progress;**
- **Provide schools confidence and competence through appropriate support and training;**
- **Support home school links;**
- **Assist schools in tackling racism and in particular racial bullying; and promoting intercultural awareness.**

### **Policy Statement**

**The proposed Policy Statement is to develop positive actions which would ensure that:**

- **Minority ethnic pupils have full access to the Northern Ireland curriculum;**
- **Minority ethnic pupils have the opportunity to achieve their educational potential;**
- **School have the capacity to support minority ethnic pupils appropriately (culturally and otherwise);**
- **Schools have equitable access to high quality continuous professional development;**
- **Positive partnerships are developed;**
- **Approaches are based on “best practice” locally, nationally and internationally;**
- **Access is available to “joined up” services across a range of key partners;**
- **Government department policies, practices and funding are aligned.**