



## **Consortium for the Regional Support for Women in Disadvantaged and Rural Areas**

**Response to: Peace Plus Programme (2021-2027)**

**Issued by: Special EU Programmes Body (SEUPB)**

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# **Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas**

## **1. Introduction**

**1.1** This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

**1.2** The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.<sup>1</sup> The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

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<sup>1</sup> Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisation

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**1.3** The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

**1.4** The Women's Regional Consortium appreciates the opportunity to respond to the Special EU Programmes Body (SEUPB) consultation on the Peace Plus Programme. These funding programmes are an important way of supporting peace and prosperity in local communities. Women and the organisations that represent women are an important, and often unacknowledged, part of peacebuilding work in local communities. We believe it is important that any funding available for supporting peace and prosperity should acknowledge and address the importance and centrality of women and women's organisations to these issues.

## **2.0 General Comments**

The Women's Regional Consortium appreciates the opportunity to respond to this consultation. We wish to make some general comments before answering the specific questions asked in the consultation document.

### **2.1 The Consultation Process**

While we welcome having the opportunity to respond to this important consultation we have concerns about the consultation process in terms of the short turnaround for responses with consultees only being given nine weeks to respond. We believe that this is a short deadline for an issue of such importance and it goes against all existing

good practice on consultation timeframes: *“When government consults it must build a realistic timeframe for the consultation, allowing plenty of time for each stage of the process.”*<sup>2</sup>

The Covid19 pandemic has had a huge impact on all our lives and on our ability to work and communicate with each other. For the community and voluntary sector the impacts of lockdown have meant that the ability to carry out normal ways of working have been severely curtailed. This has been particularly challenging for carrying out research work and in trying to effectively gather the views of people in relation to consultation exercises.

This consultation came at a time when the women’s sector and indeed the wider voluntary and community sector has come under significant pressure with the sheer volume of consultations ongoing. Many of these consultations are also significant in terms of their importance and many have particular implications for the women’s sector so have required an investment of time and resources to produce detailed responses.

Despite the fact that there is a challenging work environment the timeframe for responses did not make any allowances for this therefore putting significant pressure on an already over-worked and under-resourced voluntary and community sector.

We would suggest that given the nature and importance of this Consultation and a range of external factors such as Covid19 restrictions on carrying out research and an already busy consultation environment that the deadline should have been longer to enable genuine and meaningful consultation.

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<sup>2</sup> nidirect <https://www.nidirect.gov.uk/articles/public-consultations>

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We would refer the SEUPB to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.<sup>3</sup> This guidance contains five top tips based on the many years of experience that women's groups have in promoting women's participation in public policy making. These include the need to work together with the women's community and voluntary sector, making time for accessible face to face engagement, keeping language accessible and relevant, listening to the stories from women and making women visible in the product as well as the process.

We are disappointed that the SEUPB did not organise any consultation events around the content of this consultation. This would have helped to explain the detail of the programme, enable consultees to get more information and have the ability to ask questions. This is particularly important in a consultation of this nature which involves a lot of information and where there are multiple strands within each theme which may warrant further explanation and analysis.

We wish to acknowledge the work of the Rural Community Network (RCN) in organising an online webinar to discuss the contents of this consultation. These events are critical to ensure knowledge of the content of consultations as well as providing consultees with the ability to share knowledge and experience of the issues. Once again this important work was undertaken by the community and voluntary sector who as previously outlined are already over-worked and under-resourced.

The Women's Regional Consortium also has concerns about the format of some of the consultation questions. It asks a number questions each of which has range of options followed by a space to expand the answer. As WRDA guidance on public consultations<sup>4</sup> states: "the binary 'agree/disagree' nature of many questions hides the complexity of how people feel about different issues." We would urge extreme

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<sup>3</sup> Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017

[https://wrda.net/wpcontent/uploads/2018/10/WRDA\\_WomenAtTheHeartOfPublicConsultation.pdf](https://wrda.net/wpcontent/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf)

<sup>4</sup> Ibid

caution on using statistics on responses to these binary questions as the basis for making conclusions on the proposals.

The answer to these 'agree/disagree' questions needs careful analysis alongside the accompanying text. Careful consideration must be given to the fact that people may select one of these options but clarify this in the space below. They may have several qualifications to their answer and if these are not addressed their answer may be different. The results from the 'agree/disagree' answers must not be considered in isolation or presented in such a way that they paint a misleading picture of responses. We would encourage the SEUPB not to use results from these binary questions as the basis for any decision making. If they are to be used they should not be used in isolation from any clarifications given within the accompanying text.

We are also concerned about the small amount of space given over to the text boxes accompanying these 'agree/disagree' questions. These provide a maximum of 500 characters (not words) to explain or qualify your answers. It would seem that the consultation is seeking to limit the feedback which can be given around these important areas and we believe this is to the detriment of this process.

## **2.2 Women's Involvement in Peace Processes**

Given the extensive role of women in the peace process in Northern Ireland and the success of women's involvement in peace negotiations around the world it is vital that women's needs and experiences are central to the themes, investment areas and activities of Peace Plus. "*The marginalisation of women can delay or undermine the achievement of sustainable peace, security and reconciliation.*"<sup>5</sup>

Research across the world has shown the importance of women's involvement in peace and reconciliation work. Peacebuilding work should therefore be informed by women's perspectives. "*Sustainable and durable peace requires the participation of*

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<sup>5</sup> Women and peace and security, Report of the Secretary-General, S/2010/173, April 2010  
[Etpu \(securitycouncilreport.org\)](http://Etpu (securitycouncilreport.org))

*women and girls, as well as the integration of gender perspectives in all reconstruction processes.”<sup>6</sup>*

### **2.3 The Women’s Sector**

We believe that the women’s sector has a huge amount to contribute to sustainable peace and prosperity within local communities. Women are a significant presence in local communities and within victims and community organisations in both providing and receiving services.

Many women’s centres opened in the heart of communities where the impact of the conflict had been greatest and are often located in areas of greatest deprivation. They opened in response to a need in their local communities which was not being met by Government or anyone else.

The women’s sector and women’s centres have been carrying out peacebuilding, reconciliation and anti-poverty work for many years. They deal with many issues arising out of the Troubles, welfare reform and austerity as well as more recently issues arising out of the Covid19 pandemic. These women’s groups already carry out a range of work to help women and families deal with the impact of these issues. This includes work to address trauma, mental health issues, alcoholism, addictions to prescription and illegal drugs, domestic violence, parenting issues, isolation and poverty and debt.

Women’s centres are often best placed to contribute to addressing these issues because they operate within local communities and are trusted to do this work. They are able to reach and engage those who are the most marginalised and potentially some of those most affected by the legacy of the Troubles, austerity/welfare reform and the impact of Covid19.

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<sup>6</sup> Women, Peace and Security, Study submitted by the Secretary-General pursuant to Security Council resolution 1325 (2000), p111, United Nations, 2002, <http://www.un.org/womenwatch/daw/public/eWPS.pdf>

There is much to learn from work already undertaken by the women's sector in terms of peace building, reconciliation, fighting against poverty and in engagement with marginalised groups. It is important that this valuable learning and experience is recognised and rewarded through the availability of funding for this work which does so much to promote peace and prosperity in local communities.

While we are pleased to see that the consultation document states that the Programme will place particular emphasis on providing support to those most marginalised within our communities including women (page 31) we do not think that this goes far enough. We do not see that the Peace Plus Programme provides adequate opportunity for women's sector organisations, groups and centres to apply for this funding. We stress again the importance of the need for this funding to be available to grassroots community organisations, such as Women's Centres, who can access those who are the most marginalised.

***“Women’s Centres, like Footprints, have been doing peace and reconciliation work for years.”***

*(Participant at Consultation Event)*

***“Our groups have been working with victims and survivors for years. They need to give resourcing to groups who already do this kind of work. Our groups hear these stories every day. Put money into groups on the ground who are working with victims and survivors and who can support them.”***

*(Participant at Consultation Event)*

***“If they would invest this money into community groups who are already doing this work, in particular in the women’s movement, then this would work. I haven’t heard any sectarianism in any of the women’s groups we work with and we have been working together since the start of the Troubles. We have been doing peace and reconciliation work for over 30 years since before the Good Friday Agreement.”***

*(Participant at Consultation Event)*

***“Women have held communities together yet services for women are being cut and cut and cut.”***

*(Participant at Consultation Event)*

### **2.3.1. Funding for the Women's Sector**

Despite the central role played by women in securing and negotiating peace in Northern Ireland, and their role in the provision of essential services to women and communities throughout the conflict, funding for women's services is being cut. This is further compounding the marginalisation of women often those who are the most at risk of poverty and social isolation.

Funding for the women's sector in Northern Ireland has been continually diminishing over the past ten years. In the last five years alone, the women's sector has faced cuts of 2 – 5% per year from budgets. Women's organisations have seen a shift from core funding to short-term project funding. This limits their ability to respond to emerging issues, retain key staff and develop any long term planning to meet the needs of women.

Funding for the women's sector is essential in ensuring that women can be empowered to help build peaceful and thriving communities as well as providing for the needs of some of the most marginalised women in our society. Women's centres provide trusted spaces situated within local communities and are able to reach and engage those who are the most marginalised. The women's sector must be adequately resourced to continue and strengthen its work on fighting poverty, peace and reconciliation within and between communities.

***“It needs people working at grass roots level. There needs to be a bottom-up approach so that everyone's voices will be heard.”***

*(Participant at Consultation Event)*

***“The community needs to have a bigger role in this – there's trust at community level.”***

*(Participant at Consultation Event)*

## 2.4 Sustainable Development Goals (SDGs)

We very much welcome that Peace Plus has been developed with the UN Sustainable Development Goals in mind. The SDGs are an important blueprint for the next 15 years of the world's development and provide an important context within which this Programme sits. The SDGs contain 17 goals and targets on tackling poverty and reducing inequalities with a specific goal on achieving gender equality and empowering all women and girls (Goal 5).<sup>7</sup> While there is a specific goal on gender equality it cuts across all 17 SDGs and is reflected in 45 targets and 54 gender-specific indicators.<sup>8</sup> The fundamental role of gender equality within the SDGs means that investments in gender equality can be crucially important to achieving the goals.

## 2.5 European Green Deal

The International Labour Organization (ILO)<sup>9</sup> has argued that without consistent gender mainstreaming, sustainability in a green economy is inconceivable arguing that *“gender equality must be at the core of promoting green economies that are low-carbon, resilient and sustainable.”*

In an analysis of existing Green New Deal plans in the UK, Cohen and MacGregor<sup>10</sup> state that these plans place far more emphasis on the green aspects and that gender roles, norms and relations are not meaningfully considered. This results in a lack of acknowledgement of the links between the climate crisis and gender inequality and therefore that addressing gender inequality is not considered in plans for decarbonising the economy.

It is therefore vital that gender inequality is considered within the Green Deal and in how the Peace Plus Programme will contribute to this.

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<sup>7</sup> <https://sdgs.un.org/goals/goal5>

<sup>8</sup> <https://www.undp.org/content/undp/en/home/blog/2019/what-does-equality-have-to-do-with-the-sdgs-.html>

<sup>9</sup> Gender Equality and Green Jobs, International Labour Organization Policy Brief, 2015 [wcms\\_360572.pdf \(ilo.org\)](https://www.ilo.org/wcms/360572.pdf)

<sup>10</sup> Towards a Feminist Green New Deal for the UK, A paper for the WBG Commission on a Gender-Equal Economy, Maeve Cohen and Sherilyn MacGregor, 2020 [Towards-a-feminist-Green-New-Deal-for-the-UK.pdf \(wbg.org.uk\)](https://www.wbg.org.uk/Towards-a-feminist-Green-New-Deal-for-the-UK.pdf)

## 2.6 Political Context

We acknowledge and welcome the reference to a Childcare Strategy within this section of the consultation document and suggest that the lack of affordable, accessible childcare in Northern provides an important context within which this funding programme will operate.

Northern Ireland still does not have a Childcare Strategy, nor adequate childcare provision, despite the commitments in New Decade, New Approach. The Women's Regional Consortium, as members of the Childcare for All Campaign, have been calling on Government to introduce a fully costed Childcare Strategy, underpinned by legislation, that meets the needs of children, parents, childcare providers and benefits the local economy.

Research shows that 40% of families in Northern Ireland (around 350,000 workers) have dependent children.<sup>11</sup> Childcare is the biggest monthly bill faced by 33% of families in Northern Ireland costing more than their mortgage or rent payments and for 60% of parents their childcare bill is their largest or second largest monthly outgoing.<sup>12</sup> The World Economic Forum found that UK parents pay the highest childcare costs in Europe and the second highest in the world.<sup>13</sup>

Differing childcare support in Northern Ireland from GB means that parents in Northern Ireland are under greater financial pressure with regards to childcare costs. Families in Northern Ireland do not have access to the 30-hours free childcare per week available to eligible families in England with a three or four-year old child.

Research by Employers for Childcare<sup>14</sup> in Northern Ireland shows that families in Northern Ireland can expect to pay a greater proportion of their household income on

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<sup>11</sup> Employment and access to childcare during the Covid-19 crisis, Nevin Economic Research Institute, May 2020

<https://www.nerinstitute.net/research/employment-and-access-childcare-during-covid-19-crisis>

<sup>12</sup> Northern Ireland Childcare Survey 2020, Employers for Childcare, November 2020

<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2020/>

<sup>13</sup> <https://www.weforum.org/agenda/2019/04/these-countries-have-the-most-expensive-childcare/>

<sup>14</sup> Northern Ireland Childcare Survey 2020, Employers for Childcare, November 2020

<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2020/>

childcare than households across the UK as a whole with the average cost of a full-time childcare place equating to 35% of the median household income before housing costs. This is amongst the highest in the OECD countries.

The CEDAW Committee has also raised the issue of childcare costs specifically in Northern Ireland noting its concern *“that childcare costs remain excessive, particularly in Northern Ireland, which constitutes an obstacle for women to enter and progress in the workplace.”*<sup>15</sup> The Committee recommended that Government should ensure the availability of affordable and accessible childcare particularly in Northern Ireland.<sup>16</sup>

The availability of accessible, affordable childcare is a key consideration for women’s participation in the economy and for women’s education and training. Childcare plays a crucial role in getting people into employment and in helping to tackle disadvantage and gender inequality. The Women’s Regional Consortium believes that childcare and the development of a fully funded Childcare Strategy is a key issue in addressing many of the issues within the current political and economic context of the Peace Plus Programme.

***“There are a lot of impacts for lone parents – it is no joke for them. There are no crèche facilities/childcare in this area. Women can’t afford the childcare that does exist.”***

*(Participant at Consultation Event)*

***“I am a lone parent, there is a lack of suitable jobs in the area, expensive childcare and I have mental health issues. I would struggle financially if working full-time with childcare costs, rent and regular expenses so it isn’t really a viable option.”***

*(Participant at Consultation Event)*

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<sup>15</sup> Concluding Observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, CEDAW/C/GBR/CO/8, March 2019, para 45  
[https://tbinternet.ohchr.org/\\_layouts/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8&Lang=En](https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8&Lang=En)

<sup>16</sup> Ibid, para 46

***“I can’t afford childcare as I don’t get any support with it. I am lucky I have family to look after my kids. Without them I would need to leave work. My salary is not enough to pay the mortgage and childcare without some help.”***

*(Participant at Consultation Event)*

***“I have two children under four. The cost of childcare is extortionate. It is our biggest outgoing. Despite help from grandparents we struggle to make these payments.”***

*(Participant at Consultation Event)*

***“Childcare is one of the key things for women. It is one of the biggest barriers women face to taking part socially, politically and economically.”***

*(Participant at Consultation Event)*

## **2.7 Economic Context**

The consultation document sets out a number of different aspects of the economic context within which the Peace Plus Programme will operate. The document outlines the wide ranging impacts of the Covid19 pandemic which are likely to dominate the economic context for some considerable time. We wish to raise the following issues for women with regards to the economic context of this funding programme and ask that SEUPB takes these into account as an important part of this context.

### **2.7.1. The Impact of Covid19 on Women**

The ongoing Covid19 pandemic has created unprecedented challenges across the world. The crisis affects men and women differently and in many cases deepens the inequalities that women already experience. Women are more likely to bear the brunt of this crisis for a number of reasons:

- Women are more likely to be low paid and in insecure employment. Women were the majority of low paid earners (69%) the majority of those in part-time employment (74%), involuntary part-time employment (57%), temporary employment (54%), zero-hours contracts (54%) and part-time self-employment (59%).<sup>17</sup>

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<sup>17</sup> Submission to the Women and Equalities Select Committee inquiry: Unequal impact? Coronavirus and the gendered economic impact, Women’s Budget Group, June 2020  
<https://wbg.org.uk/wp-content/uploads/2020/06/WBG-Gender-economic-impact-submission.pdf>

- Female employees were more likely than male employees to be working in jobs paying the National Minimum Wage. Low paid women were more likely than low paid men to remain stuck in low paid jobs;<sup>18</sup>
- Women are twice as likely to be key workers as men, 65% of key workers are female compared to 47% of the whole working population;<sup>19</sup>
- In Northern Ireland women make up 79% of health and social care staff.<sup>20</sup>
- Many of the workers in health and social care sectors are low paid. 98% of the 1 million high exposure key workers being paid less than 60% of median average wages are women.<sup>21</sup>
- Employed women were a third more likely than employed men to work in shutdown sectors over the first national lockdown with one in six (17%) of female employees in such sectors compared to one in seven (13%) of male employees<sup>22</sup> making them at particular risk of job loss.
- HMRC statistics show that across the UK more women than men were furloughed with 1.92 million females furloughed at 30 November 2020 compared with 1.79 million men.<sup>23</sup>
- On average, women carried out 60% more unpaid work than men reducing the time available for paid work meaning that they earn less, own less and are more likely to be living in poverty.<sup>24</sup>

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<sup>18</sup> Unequal impact? Coronavirus and the gendered economic impact, Women & Equalities Committee, UK Parliament, February 2021

<https://publications.parliament.uk/pa/cm5801/cmselect/cmwomeq/385/38502.htm>

<sup>19</sup> Risky business, Economic impacts of the coronavirus crisis on different groups of workers, Resolution Foundation Briefing, April 2020

<https://www.resolutionfoundation.org/app/uploads/2019/10/Risky-business.pdf>

<sup>20</sup> Who Runs Northern Ireland? A Summary of Statistics Relating to Gender and Power in 2020, Northern Ireland Assembly Briefing Paper, January 2020

[http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2017-2022/2020/assembly\\_exec\\_review/0120.pdf](http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2017-2022/2020/assembly_exec_review/0120.pdf)

<sup>21</sup> Low-paid women in UK at 'high risk of coronavirus exposure', The Guardian, March 2020

<https://www.theguardian.com/world/2020/mar/29/low-paid-women-in-uk-at-high-risk-of-coronavirus-exposure>

<sup>22</sup> Sector shutdowns during the coronavirus crisis: which workers are most exposed? Institute for Fiscal Studies Briefing Note BN278, April 2020

<https://www.ifs.org.uk/uploads/BN278-Sector-Shutdowns.pdf>

<sup>23</sup> Coronavirus Job Retention Scheme statistics: January 2021, HMRC

<https://www.gov.uk/government/statistics/coronavirus-job-retention-scheme-statistics-january-2021/coronavirus-job-retention-scheme-statistics-january-2021>

<sup>24</sup> Women shoulder the responsibility of 'unpaid work', Office for National Statistics, November 2016

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/articles/womenshouldertheresponsibilityofunpaidwork/2016-11-10>

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- Women are less likely to be eligible for Statutory Sick Pay (SSP) because they are overrepresented in low paid work and on zero hours contracts. Women’s Budget Group calculations find that 15.5% of women and 10.6% of men do not earn enough to qualify for SSP.<sup>25</sup> This points to a disproportionate financial impact of self-isolation on women.

In July 2020 the Women’s Policy Group Northern Ireland published a comprehensive Feminist Recovery Plan<sup>26</sup> highlighting many of these issues and calling on decision-makers across the UK to take action to ensure a gender-sensitive response in the transition from crisis response to recovery. This plan provided clear evidence for how to prioritise actions coming out of the pandemic. Despite this call there has been little progress in alleviating the impact of the pandemic on women.

It is imperative that as society emerges from the Covid19 pandemic and resulting recession that women must not pay the price as they did for the previous financial crash. Women have already suffered immensely due to a decade of austerity policies and this must not be allowed to happen again. There is a real need in for targeted support to ensure that those who have been impacted the most by this pandemic are given the help they need to prevent and reduce poverty.

***“Women don’t have equal rights and Covid has highlighted a lot of that. Women are struggling with homeworking, looking after children and working at the same time. Men’s jobs are seen as more important.”***

*(Participant at Consultation Event)*

***“It’s a real hard time for everyone especially women.”***

*(Participant at Consultation Event)*

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<sup>25</sup> Submission to the Women and Equalities Select Committee inquiry: Unequal impact? Coronavirus and the gendered economic impact, Women’s Budget Group, June 2020  
<https://wbg.org.uk/wp-content/uploads/2020/06/WBG-Gender-economic-impact-submission.pdf>

<sup>26</sup> Covid-19 Feminist Recovery Plan, Women’s Policy Group NI, July 2020

<https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>

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### **2.7.2. The impact of Covid19 on Youth Unemployment**

The consultation document refers to rises in unemployment and highlights that the increase in the unemployment figures was driven by those under 35 years (page 14). The issue of youth unemployment is an area of major concern as research shows that more than one in 10 people aged 16 – 25 have lost their job and just under 6 in 10 have seen their earnings fall since the Covid19 pandemic began.<sup>27</sup> This research found that young workers were twice as likely to have lost their jobs compared to older employees and that employment and earnings losses are more pronounced for women, the self-employed and those who grew up in a poor family.

The Institute for Fiscal Studies found that the lockdown hit young people the hardest.<sup>28</sup> This report also states that on the eve of the crisis the sectors that are shut down as a result of social distancing measures employed nearly a third (30%) of all employees under the age 25 (25% of young men and 36% of young women). So it is clear therefore that young women will be more impacted by youth unemployment as a result of the Covid19 pandemic than young men.

### **2.7.3. The Impact of the Coronavirus pandemic on the Social Security System**

Job losses, reductions in working hours and the need to provide increasing levels of care as a result of the Covid19 pandemic is likely to increase dependence on social security benefits. The consultation document references the increases in the claimant counts as a result of the pandemic.

In Northern Ireland new claims to Universal Credit experienced a massive increase as a result of the lockdown rising to 35,420 new claims in March 2020 from 6,630 new claims in February 2020. There are now 114,530 households on Universal Credit in Northern Ireland an annual percentage increase in claimant numbers of 156.7%.<sup>29</sup> Unfortunately, Universal Credit statistics are currently unavailable broken

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<sup>27</sup> Generation COVID and Social Mobility: Evidence and Policy, Centre for Economic Performance, October 2020 <https://cep.lse.ac.uk/pubs/download/cepcovid-19-011.pdf>

<sup>28</sup> Sector shutdowns during the coronavirus crisis: which workers are most exposed? Institute for Fiscal Studies Briefing Note BN278, April 2020 <https://www.ifs.org.uk/uploads/BN278-Sector-Shutdowns.pdf>

<sup>29</sup> Northern Ireland Benefits Statistics Summary, DfC & NISRA, August 2020

down by gender. However, the latest figures available show 28% of Universal Credit claimants were lone parents (the majority of lone parents are women).<sup>30</sup>

The numbers of people claiming Universal Credit are likely to continue to rise even further as a result of the recession arising out of the pandemic and the fact that many people will be unable to get work due to economic constrictions. This will mean more people, including many women, relying on Universal Credit to provide for themselves and their families.

Women's Regional Consortium research on the impact of Universal Credit on Women<sup>31</sup> has shown that women's experiences living on Universal Credit are overwhelmingly negative. The research highlights how the design of Universal Credit does little to protect women and their children from living on low incomes and in poverty. The research recommended that in its recovery response Government should apply an intersectional gender lens to social security policy, particularly in relation to Universal Credit, so that policies are developed and implemented to specifically support women who have been impacted by the Covid19 crisis.

***“With just Universal Credit it’s no life to live. We can’t have the heating on just when it’s really cold because we can’t afford the gas, we had to have just hot water bottles at night. Thank God for food banks otherwise eating would have been much worse. No new clothes! I’m glad my little one is only small and doesn’t seem to pick up on trends and knows we don’t have much money so she doesn’t ask for much because I can never afford it.”***

*(Quote taken from Women’s Regional Consortium Research on the Impact of Universal Credit on Women, September 2020)*

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[NI Benefits Statistics Summary - August 2020 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk)

<sup>30</sup> Northern Ireland Benefits Statistics Summary, DfC & NISRA, August 2020

[NI Benefits Statistics Summary - August 2020 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk)

<sup>31</sup> The Impact of Universal Credit on Women, Women’s Regional Consortium, September 2020

<http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

Increases in demand for working age benefits as a direct result of Covid19 related unemployment are likely to continue for a considerable time. Increased numbers of people will require employment support to help them enter employment and reduce their dependence on benefits. Funding is needed to address these issues which are likely to impact on a number of Section 75 groups. We believe that this will have more adverse implications for women and their dependents for all the reasons previously outlined in section 2.6.1.

#### **2.7.4. Economic Inactivity**

The consultation document references the fact that economic inactivity rates in Northern Ireland remain significantly higher than the UK average (page 14) but does not analyse this further. The Northern Ireland economic inactivity rate has increased to 27% and it is consistently above the UK average (now at 20.7%). The female economic inactivity rate is 30.9% compared to 23% for men.<sup>32</sup> In looking at the detail of economic inactivity it shows that more than a third of women who were unavailable for work gave the reason for inactivity as family/home commitments (61,000 or 34%) and this was the least likely reason for male inactivity (at 8,000 or 6%).<sup>33</sup> This is an important consideration in terms of education, training, childcare and employment support as women are clearly in need of increased support in order to be able to move into work.

### **2.8 SWOT Analysis**

The consultation document outlines the SWOT analysis commissioned by the SEUPB which includes the impact of Covid19 (pages 17 – 19). We wish to raise a number of points around the Weaknesses outlined in the document which do not address the gender-specific nature of these impacts.

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<sup>32</sup> Northern Ireland Labour Market Report, NISRA, January 2021  
<https://www.nisra.gov.uk/system/files/statistics/labour-market-report-january-2021.pdf>

<sup>33</sup> Women in Northern Ireland 2020, NISRA, June 2020  
[https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/Women%20in%20NI%202020\\_0.pdf](https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/Women%20in%20NI%202020_0.pdf)

### **2.8.1. Low Paid Work**

The region with the highest proportion of jobs paid below the Living Wage in April 2020 was Northern Ireland (25.3%). Women are significantly more affected by low pay than men with more women earning less than the Living Wage in the UK (23.8% compared to 16.6%). Part-time jobs (35.9% or 2.8 million jobs) were much more likely to be paid below the Living Wage in April 2020 than full-time jobs (14%).<sup>34</sup>

Women are significantly more likely to work part-time than men with 79% of part-time employees being women. This has a significant impact on women's income as women often struggle to increase their hours of work due to caring responsibilities. Providing care limits both the number of hours a person can work and the distance they travel for work and this can leave many women locked in poverty especially when jobs are low paid.

Women are also more likely to be employed on a zero-hours contract than men with 3.6% of women employed on these contracts compared to 2.8% of men across the UK.<sup>35</sup> Single parents are twice as likely to have a zero-hours contract as other family types.<sup>36</sup> This puts them at greater risk of job insecurity particularly as a result of the Covid19 pandemic.

### **2.8.2. Community based education and training**

The consultation document mentions the issues of long-term unemployment, economic inactivity and low-paid work as weaknesses (page 18). However, while access to training and education is briefly mentioned in other areas of the SWOT analysis there is no specific mention of the importance of community based education and training.

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<sup>34</sup> Employee jobs paid below the Living Wage: 2020, Living Wage Foundation, November 2020  
<https://www.livingwage.org.uk/employee-jobs-paid-below-living-wage-2020>

<sup>35</sup> People in employment on zero hours contracts, Office for National Statistics, August 2020  
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/emp17peopleinemploymentonzerohourscontracts>

<sup>36</sup> Caring without sharing, Gingerbread, November 2020  
<https://www.gingerbread.org.uk/wp-content/uploads/2020/11/Gingerbread-Caringwithoutsharing-v3.pdf>

The right to education is an important means to achieve gender equality and in enabling people to achieve their full potential. It is important that education and training is provided over the course of a lifetime and adapts to changing life circumstances. Community based education and training is vitally important to women in disadvantaged and rural areas reflecting their individual needs. It is a fundamental building block in supporting women to rebuild their confidence and their capability to enter the workplace and is a means to maintaining overall wellbeing. Community based education and training is generally delivered based on local community needs and takes account of the complexity of women's lives and the barriers they face such as education, course fees and the academic environment.

Women's exclusion from participation may be significantly impacted by educational disadvantage which can profoundly restrict a person's life prospects and wellbeing. Community-based women's education and training has emerged and evolved in response to this educational disadvantage with the express aim of accommodating unmet learner need. Improved employment prospects for mothers through education and training can translate as improved outcomes for children and the reverse is also true restricting wellbeing for the mother and also the wider family.

Effective policy responses to addressing women's disadvantage can rely on the integrated availability at community level of appropriate childcare and learning pathways to potential employment such as that provided by the Women's Centre Childcare Fund (WCCF).

The Women's Regional Consortium believes that investing in community-based training and education and integrated childcare is an important factor in enabling women in low income households to access the training and education they need to make the move into work. This must be an important consideration within the Programme for Government in that it helps deliver on a number of key priorities including gender equality, employment support, anti-poverty and child poverty work.

It is worth noting that there is no Government funding allocated to community-based education and training. There is no money from Government for this important work and it has had to rely on funding from the EU and from other charitable organisations/funders.

***“Education for women has been cut in the last 10 years and reduced away to nearly nothing. Things need to be resourced.”***

*(Participant at Consultation Event)*

For some women (including ethnic minorities and lone parents) the prospect of increased economic participation can depend on the availability of appropriate integrated childcare and access to education/training opportunities at community level. A lack of appropriate integrated childcare and community education acts as a fundamental barrier to the engagement of socioeconomically disadvantaged women in education and training and in employment. This is the kind of integrated provision that is provided by WCCF and which is so vital to these women.

***“I can only do a course if it has childcare available.”***

*(Participant at Consultation Event)*

### **2.8.2.1. Women and the Peace Programmes**

Historically training and education was acknowledged as key to economic growth which in turn was essential to establishing and sustaining peace in Northern Ireland. When the first European Union (EU) Programmes were secured for Northern Ireland including the PEACE I Programme, economic growth was a key driver. Within these programmes there was also special provision made for women and children in terms of services, training and development to ensure equality of access and provision to the labour market.

Training and education was seen as an integral pathway to empower women to make their own choices and increase opportunities to improve life chances for them and their children. This was and still is particularly important for women escaping poverty, domestic violence, isolation and poor mental health. Locally based training and education was accessible for women as it addressed the barriers to

participation: childcare, travel, timing of classes as well as providing one to one study support, group study support and access to IT. These projects provided a pathway to empowerment and employment for women.

Women only measures were established in both the PEACE 1 and PEACE 2 Programmes and the forerunner to ESF, the Building Sustainable Prosperity Programme (BSP). These measures were delivered through both community and voluntary organisations and statutory agencies and proved to be highly successful in terms of the numbers of women trained, retrained and gaining employment. They also led to the establishment of high quality trusted childcare provision in disadvantaged communities for the first time.

To give some idea of the successes of the women only measures, the following statistics are taken from one regional organisation, TWN who at the time acted as an Intermediary Funding Body (IFB) for the delivery of PEACE funding to projects that supported training and development for women:

PEACE 1: 4271 women availed of training; 347 gained employment\*

PEACE 2: 5723 women availed of training; 4020 gained accredited qualifications;  
1718 gained employment\*

PEACE 2: 6542 women availed of training; 3537 gained accredited qualifications;  
896 (extension) gained employment\*

\*this was six months after the closure of the programme and does not account for those who progressed into employment after this period or as direct result of qualifications and training acquired through the programme.

PEACE 3 saw the removal of the women only measure and a change in the main aim of the programme which focussed on the peace and reconciliation outputs as opposed to economic outputs in terms of training and employment.

### **2.8.3. Apprenticeships**

The consultation discusses investing for the future in terms of apprenticeships to enhance employability and support economic growth (page 11). We are supportive of the need for apprenticeships to achieve these aims and we believe that employability programmes are crucial in the achievement of the objectives of this funding namely peace and prosperity.

However, we wish to stress that apprenticeships and employability programmes must not solely be for younger people and should be open to people of all ages. This is particularly the case for women who may have been looking after children/families and may wish to return to work later in their lives but may need support and access to training/education in order to do so.

We also wish to highlight the urgent need for apprenticeships in the community sector not just in traditional areas which are often more likely to be available to men. Women in focus groups discussions talked about the crisis within the community sector in terms of getting new people to take on community development and good relations roles. One woman who worked in a community development role talked about having to defer her pension for two years as there was no one to fill her role. These are critical roles within local communities yet funding for these roles is short-term. This means that these jobs are not attractive and do not provide job security or the ability for these workers to be financially secure.

Women also raised issues about the level of pay for apprenticeships. The current level of pay is often too low keeping many people out of these schemes as they simply do not provide a decent wage.

***“It is really hard to get women into community development work. There is no future in it with the short term funding. If they are looking to get a mortgage and working in community work they won’t get one. It has to be more attractive but it is not at the minute with only one year’s funding for these posts.”***

*(Participant at Consultation Event)*

***“All the funding for apprenticeships is for young people. There are a lot of older women with a passion for peacebuilding who have built up trust and relationships with people who have lived through the Troubles who would benefit from an apprenticeship. Many of them are volunteering at this work but haven’t had the opportunity for employment in the community.”***

*(Participant at Consultation Event)*

***“Peace building work is at a crucial stage right now with grassroots communities. If you look at the Women’s Centres many of the staff are older women. They are coming to the end of their working life but there are few younger women to take over. There is not the same drive for grassroots community work yet it is crucial for peacebuilding.”***

*(Participant at Consultation Event)*

***“Employability needs to be a peacebuilding measure. Mixing in workplaces builds trust and friendships and helps to build peace. It was at the heart of the original peace but many do not see that employment creates peace. People worked together across communities and that is what helped to build relationships and through that to build peace.”***

*(Participant at Consultation Event)*

#### **2.8.4. Mental Health**

The consultation makes mention of a number of health inequalities which persist in Northern Ireland including mental health (page 18). The figures around mental health problems in Northern Ireland are stark. Northern Ireland has the highest prevalence of mental health problems in the UK, with a 25% higher overall prevalence of mental health problems than England.<sup>37</sup> The legacy of the Troubles is recognised as having a significant impact on mental health in Northern Ireland with 39% of the population in Northern Ireland experiencing a traumatic event relating to the Troubles.<sup>38</sup> The figures for young people are equally concerning showing the likelihood of continuing high levels of mental health problems long into the future in Northern Ireland. Anxiety and depression is 25% more common in children and young people in Northern Ireland compared to other parts of the UK.<sup>39</sup>

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<sup>37</sup> Mental Health Strategy 2021-2031 Consultation Draft, December 2020

<https://www.health-ni.gov.uk/sites/default/files/consultations/health/doh-mhs-draft-2021-2031.pdf>

<sup>38</sup> Ibid

<sup>39</sup> Ibid

Figures from the Department of Health<sup>40</sup> show that women are more likely than men to experience mental health problems. 20% of women scored a high GHQ12 score (indicating a possible psychiatric disorder) compared to 16% of men with those in the most deprived areas more likely to record a high score compared to those in the least deprived areas. The age groups most likely to report a high score were women aged 55 – 64 followed by men aged 16 – 24 and women aged 45 – 54. Research shows that women are more likely to suffer from depression than men<sup>41</sup> with 22% of men and 28% of men over 65 suffering from depression.<sup>42</sup>

There are a number of factors affecting women's mental health. Women are more likely to live in poverty than men and women are more likely to be providing care either for their children or for other family members. Poverty and working in the home can mean that women are more likely to be isolated and social isolation is linked to mental health problems. In addition, women are also more likely to be exposed to gender-based violence than men which can have long-term impacts on their mental health. When women find it hard to talk about difficult issues or are not given the support they need to deal with mental health issues they can internalise these issues and this can lead to depression, eating disorders and self-harm.

While we welcome the funding proposed for youth mental health we are concerned that the issue of adult mental health has not been addressed within this Programme. The Covid19 pandemic will have had untold mental health impacts on people of all ages. It has been a total lifestyle change for many people and the impact of this will be huge. This is particularly the case for women many of whom have had taken on unpaid caring roles for elderly parents/relatives. This had led to issues with social

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<sup>40</sup> Health Survey Northern Ireland 2018/19, Department of Health, January 2020

<https://www.health-ni.gov.uk/publications/health-survey-northern-ireland-first-results-201819>

<sup>41</sup> Mental Health in Northern Ireland, Northern Ireland Assembly Research and Information Service, January 2017

<http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2016-2021/2017/health/0817.pdf>

<sup>42</sup> Mental Health Strategy 2021 – 2031, Consultation Draft, Department of Health, December 2020  
<doh-mhs-draft-2021-2031.pdf> ([health-ni.gov.uk](http://health-ni.gov.uk))

isolation and poor physical and mental wellbeing. Much of this work is invisible and unrecognised and this can have profound implications for mental health.

***“There needs to be better care for mental health issues. I had issues with my mental health and without being able to be referred by my work to places for support I wouldn’t have got anywhere in the normal health sector. Mental health is a bigger problem for women, it comes at women from more directions than men.”***

*(Participant at Consultation Event)*

***“Mental Health issues are not new. It has been rising like a volcano for the last 20-30 years.”***

*(Participant at Consultation Event)*

***“There is nothing in this funding for adult mental health. This is going to be a huge issue. Many people will struggle with their mental health going back to work, going out of the house again but there is no funding to help with these issues.”***

*(Participant at Consultation Event)*

### *Mental Health and Rural Needs*

Northern Ireland has a significant rural population with 36% of the population living in rural areas.<sup>43</sup> Those who live in rural areas often have less access to health services including mental health services than those in urban areas. Rural dwellers often have specific needs and experiences. NIRWN’s 2018 research<sup>44</sup> uncovered that many rural women felt that they were “*becoming more isolated, with many of our support agencies being located in urban settings.*”

There was agreement amongst those surveyed that rural women needed a place to meet and a reason to meet up. The conversations around this primarily linked inextricably to the provision of education and training for women in rural areas and the lack thereof. In relation to addressing social isolation those NIRWN spoke with

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<sup>43</sup> Mid-Year Population Estimates – Urban/Rural Change, NISRA

<https://www.daera-ni.gov.uk/publications/mid-year-estimates-population-change>

<sup>44</sup> Rural Voices Report, NIRWN, 2018

<https://www.nirwn.org/wp-content/uploads/2018/03/NIRWN-Rural-Voices-Research-Report-March-2018.pdf>

concluded that being able to provide any class locally, should it be: yoga, craft classes, information talks etc, created a mechanism to engage those who were socially isolated.

NIRWN's member groups operate within their local area and as such hold local knowledge such as, who has recently suffered a bereavement, who is experiencing a difficult time, who has overwhelming caring responsibilities and as such they quietly and discreetly attempt to engage these people in their activities and offer to bring them along. This however is only possible if they are in a position to deliver activities locally; without exception all were finding that *"It is increasingly difficult to find funding to support overheads like room rental to be able to run any activities."*

NIRWN members can clearly identify themselves the impact of social isolation on health and wellness and the positive effect community-based activities and education can have on addressing this. They did not believe that decision makers, particularly at government level understood the impact that small amounts of money invested in local rural groups could potentially save the health sector, which is currently in crisis.

Whilst the nature of rural isolation and its associated impacts would seem to vary, it is clear that there will be individuals who experience negative impacts such as mental health issues, the risk of suicide and potentially reduced life expectancy.<sup>45</sup> Given these potentially negative impacts, the existence and even apparent growing impact of many of the potential causal factors identified such as the increases in people living alone<sup>46</sup> may raise concerns going forward.

Social networks and local community support play a critical role in helping people either to avoid or to overcome their experience of disadvantage, by providing

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<sup>45</sup> Rural isolation, poverty and rural community/farmer wellbeing – scoping paper, Northern Ireland Assembly scoping paper, Mark Allen, June 2014  
<http://www.niassembly.gov.uk/globalassets/documents/agriculture-and-rural-development/reviews/anti-poverty/rural-isolation-poverty-and-rural-community-farmer-wellbeing---scoping-paper.pdf>

<sup>46</sup> <https://www.communities-ni.gov.uk/publications/northern-ireland-housing-statistics-2019-20>

emotional or practical support such as help with shopping, transport and money. Research<sup>47</sup> has highlighted the increasing importance of lack of community support and social isolation leading to disadvantage, as rural social networks are breaking down. UK research indicates that the additional costs of providing social care for older people may be exacerbating this problem.<sup>48</sup>

### *Women's Centres work on Mental Health*

Many of the Women's Centres carry out a range of work and programmes in relation to Mental Health in local communities across Northern Ireland. This important work has continued during lockdown and many have seen considerable increases in demand for their wellbeing and mindfulness classes as well as for one to one counselling as a result.

Some of the examples of the courses, programmes and services that the Centres provide include the Maternal Advocacy and Support (MAS) project, Mindfulness, 5 Steps to Wellbeing, Art as Therapy, Declutter Your Mind, Managing Stress, Mood Matters, Benefit Checker and Financial Support (to support women who have difficulties understanding the benefits system), offering social spaces which are women-only safe spaces for women to meet, talk and make friends and the Centres also have close links with Womens Aid NI, social services, the Probation Board, PSNI, Health Trusts, Mental Health nurses, social workers, psychiatrists, local churches and community and voluntary organisations to provide holistic services to these women and their families.

Women's Centres play a crucial role in relation to mental health services in local communities. They provide trusted, local spaces where women and men can access help in relation to mental health. The services provided are holistic so that the full range of issues that are impacting on a person's mental health can be addressed.

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<sup>47</sup> Rural Disadvantage Reviewing the Evidence, Commission for Rural Communities, September 2006  
[https://www.basw.co.uk/system/files/resources/basw\\_33716-5\\_0.pdf](https://www.basw.co.uk/system/files/resources/basw_33716-5_0.pdf)

<sup>48</sup> Social isolation experienced by older people in rural communities, Commission for Rural Communities, September 2012  
[http://cdn.basw.co.uk/upload/basw\\_111815-1.pdf](http://cdn.basw.co.uk/upload/basw_111815-1.pdf)

Early intervention is an important area of their work to ensure that mental health issues do not get the chance to take hold and cause even greater problems for those impacted. The fact that the Women's Centres provide childcare to enable people to avail of courses and counselling is a major aspect of this work. It enables people to take advantage of help with their mental health without having to disclose to friends/family if they do not wish to do so and removes a significant barrier to access for these important services especially for women.

***“I think we are just at the start. I think we are going to get a pandemic of mental health issues after the Covid pandemic.”***

*(Ruth McKeever, Manager of Chrysalis Women's Centre, Craigavon)*

***“Atlas women's centre is so important in this area and the services we provide will be needed even more coming out of lockdown. We don't care what women want to do as long as they feel they can come in and have a chat, many of them just want a connection with someone.”***

*(Gay Sherry-Bingham, Manager of Atlas Women's Centre, Lisburn)*

***“During lockdown many of our classes moved online via Zoom. In order to provide appropriate support we have been making regular weekly calls to all participants to ensure they are supported and can be directed to appropriate services during the pandemic. We also created a local 'lockdown' specific directory for all services across the Borough which was designed to help people by making it easier to avail of services and local support.”***

*(Alison Blayney, Manager of Kilcooley Women's Centre, Bangor)*

## **2.9 Sustainable Prosperity**

There is an undoubted climate emergency and its impacts are not equally felt with socially vulnerable groups such as older people, the very young, people in poor health and people in low incomes tending to be the worst affected.<sup>49</sup>

The Commission on a Gender-Equal Economy have proposed the creation of a 'Caring Economy'<sup>50</sup> based on gender equality, wellbeing and sustainability as a way

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<sup>49</sup> <https://www.climatejust.org.uk/socially-vulnerable-groups-sensitive-climate-impacts#:~:text=Older%20people,%20the%20very%20young,to%20others%20in%20the%20populati on>

<sup>50</sup> Creating a Caring Economy: A Call to Action, Commission on a Gender-Equal Economy, Women's Budget Group, October 2020

to build back better after the Covid19 pandemic. A Caring Economy would prioritise care for each other and for the environment in which we live. Women's Budget Group research<sup>51</sup> found that a 2% GDP investment in care (for example, social care, childcare, parental leave and care leave) creates double the number of jobs for women and almost as many for men than the same investment in construction. Investment in free, universal childcare especially returns almost all of its initial investment.

Eurostat data suggests that the care industry is 30% less polluting (in terms of Greenhouse Gas emissions) than the construction industry and that the education industry is 62% less polluting than the construction industry.<sup>52</sup> This makes investment in this type of social infrastructure economically, environmentally and equality sound.

## **2.10 Covid-19 Pandemic**

The consultation document acknowledges that the pandemic will have profound and lasting socioeconomic consequences (page 22) and that this means it is vital that appropriate mitigation measures are incorporated within the Peace Plus Programme design. We strongly urge SEUPB to take note of the particular implications of the pandemic for women as outlined in Section 2.7.1. of this response. Many of these issues are expanded in great detail in the Women's Policy Group's Feminist Recovery Plan<sup>53</sup> which provides evidence of the impact of the pandemic on women across a range of areas.

We are pleased to see the consultation document mention the impact of the pandemic on young people and on health inequalities but would again urge SEUPB

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<https://wbg.org.uk/wp-content/uploads/2020/10/WBG-Report-v10.pdf>

<sup>51</sup> Investing in the Care Economy: A gender analysis of employment stimulus in seven OECD countries, International Trade Union Confederation, March 2016

[Investing in the Care Economy - International Trade Union Confederation \(ituc-csi.org\)](https://ituc-csi.org)

<sup>52</sup> WBG calculations from Eurostat data

<https://ec.europa.eu/eurostat/data/database>

<sup>53</sup> Covid-19 Feminist Recovery Plan, Women's Policy Group NI, July 2020

<https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>

to take note of the gender specific nature of these impacts as outlined in Section 2.7.2. and Section 2.8.4. of this response.

### **2.11 Community Focus in the Peace Plus Programme**

Focus group work with women in local communities has always stressed the importance of a community-led approach to peace building and reconciliation work believing that a grassroots approach would ensure better engagement and trust.

We welcome the statement in the consultation document (page 23) for the need for the Programme themes and structure to encompass civil society at all levels, in relation to the development and implementation of actions and initiatives to address societal and community challenges. In this response we have already highlighted the importance and value of the voluntary and community sector in providing a community focus.

However, this work is often under-funded and under-valued by Government and we are concerned that a large proportion of the funding available through this programme may not be available to the voluntary and community sector for this work. We would therefore be concerned that the funding would not allow for effective delivery of community engagement at a local level.

It has unfortunately been the experience of many grassroots women's organisations that more recent Peace funding has mostly gone to local authorities and not to grassroots organisations. It seems from the detail of the consultation document that much of the funding for Peace Plus will be delivered in the same way.

In discussions with local women working in grassroots organisations it was felt that Peace Plus would just result in more funding for local councils and statutory organisations to "top-up" their existing funding. The tender process for some of this funding means that many smaller groups cannot apply as they do not have sufficient funds to apply for these tenders or the necessary experience to write successful tender submissions. There was a general feeling that a tender process discriminates

against smaller community organisations who are already doing this work on the ground. In addition, it was also reported that some of the previous funding did not even go out to tender that the funding just went to local Councils to do the work in-house. These must be important considerations for SEUPB in taking this work forwards and SEUPB should take action to mitigate against this in awarding funding.

We wish to stress to SEUPB that the work of community groups must not be viewed as an add-on or completely ignored. The work of the community sector must be valued as part of this process. Many of the organisations working within the community and voluntary sector have years of experience of doing peace and reconciliation work and years of experience of tackling poverty and disadvantage. They are skilled at reaching the most marginalised within communities and provide trusted spaces and skilled people to do this work. This must not be taken for granted or ignored. It is valuable work that must be recognised and rewarded as such.

***“The work of the women’s sector and women’s centres is not valued. We are just fed crumbs of funding. Yet the sector is constantly firefighting doing the work on the ground to help keep the peace but the funding always goes elsewhere.”***

*(Participant at Consultation Event)*

***“The Shared Space money went in-house. The only places that got the money were Council properties. All the Council Community Centres got the money so everything was run by the Council. We couldn’t even apply.”***

*(Participant at Consultation Event)*

***“We got Peace money before and we built up lots of contacts. But the Council are doing it all now and the community groups have had to dip out of this work. It wasn’t put out to tender.”***

*(Participant at Consultation Event)*

***“We are working in partnership with the local Council on a project but they have no sense of what is required on the ground to make it work. They just don’t understand how it works at community level.”***

*(Participant at Consultation Event)*

***“If they gave us the money we could spend the money in the best possible way for the women. Our focus is on the women and it has to be women driven. It is not for the Women’s Centre or the local Council but for the women. There needs to be a focus on the women not the organisations.”***

*(Participant at Consultation Event)*

***“I can tell you who will get this funding now.”***

*(Participant at Consultation Event)*

***“They get big organisations tendering for these programmes across all the partnerships but they do not have the ability to deliver. For them to deliver they need us but the community sector are always the forgotten ones.”***

*(Participant at Consultation Event)*

***“In community planning all the established parties are there, they can all afford to be around the table and send people for meetings. It is all stitched up, there is no room for the community sector.”***

*(Participant at Consultation Event)*

***“In Community Planning the Council just jump on the back of the work we do within the community sector.”***

*(Participant at Consultation Event)*

***“I thought the whole idea of Peace funding was that it wouldn’t fund what statutory organisations are supposed to do. It looks like Peace Plus is just going to top up statutory services?”***

*(Participant at Consultation Event)*

***“I don’t see much in this whole Programme where the community has control over the funding. It looks like another tick box for statutory agencies/bodies yet they can’t do what we do! This money is just going to top them all up.”***

*(Participant at Consultation Event)*

***“This money is moving further and further away from communities accessing it. Is it even worth putting a bid in? It’s just so much work!”***

*(Participant at Consultation Event)*

***“This looks like continuation or extension of existing Peace funding it is not new money. It’s a closed shop.”***

*(Participant at Consultation Event)*

***“True partnership working can make a massive difference but the way it works with Councils now is not partnership it is the Council trying to dictate what’s happening. It is not a level playing field. There’s partnership and there’s partnership – Councils are just using the partnership but they don’t truly see community organisations as a partner. They don’t get it at all.”***

*(Participant at Consultation Event)*

***“I believe there should be a women’s only fund like their used to be in the Peace funding which is earmarked for women’s groups and organisations including smaller organisations. Many of these groups are run by volunteers in local communities but they are being left behind.”***

*(Participant at Consultation Event)*

### 3.0 Consultation Questions

#### **Section A. About You**

**A. Are you responding on behalf of an organisation or as an individual?**

- Organisation
- Individual

**B. Please state which of the following best describes your type of organisation.**

- N/A
- Business Organisation
- Community/Voluntary Organisation
- Social Enterprise
- Cross Border Group
- Education
- Environmental Organisation
- Government Agency
- Government Department
- Higher Education
- Local Authority
- Political Party
- Private Sector
- Research Organisation

- Youth Organisation
- Other (please specify):

**C. Please state which of the following best describes your interest in this consultation?** (Select as many as applicable)

- I am a stakeholder associated with the management of the PEACE or INTERREG Programme
- I receive or have previously received funding from the PEACE or INTERREG Programmes (as a lead partner, project partner or a subcontracted organisation)
- I have applied for funding from the PEACE or INTERREG Programmes but my application was not accepted
- I have been a participant or beneficiary of a PEACE or INTERREG funded project
- I would like to get involved with this PEACE PLUS Programme
- Other (please specify):

**\* D. Contact Details** (Required)

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**E. How did you hear about this consultation? (Select as many as applicable)**

- Social media post (i.e. Facebook, LinkedIn or Twitter)
- Advert in a newspaper (print and/or online version)
- Word of mouth
- Email (sent directly to you)
- Email (sent from a friend or colleague)
- Article in a newspaper
- Other (please specify):

**Section B. Themes and Investment Areas**

**Q1. Theme 1 - Building Peaceful and Thriving Communities. To what extent do you agree or disagree with the Investment Areas within Theme 1?**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or Disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
<b>Co-Designed Local Community Peace Action Plans</b>			✓		
<b>Empowering Communities</b>		✓			
<b>Building Positive Relations</b>		✓			
<b>Re-imaging Communities</b>			✓		

**Q2. Please outline your reasons for your answers in Q1 (Max 500 characters per Investment Area)**

**Co-Designed Local Community Peace Action Plans (499 characters)**

- We are concerned that funding may be concentrated within local authorities and not in voluntary/community sector organisations who already do much of this work. We fear that the funding will become institutionalised leaving meaningless amounts of funding for the voluntary/community sector.
- Women have played a central role in peacebuilding/reconciliation work for many years yet are not mentioned here. Their role and contribution should be recognised and built on, not side-lined or ignored.

### **Empowering Communities (486 characters)**

- We welcome the Small Grants Programme which states it is designed to empower people and organisations at a grass roots level. Community and voluntary sector organisations must be allowed to avail of this funding and be rewarded for the significant contribution they make to empowering their local communities.
- We welcome reference to community education as an area of focus and stress its importance for gender equality and women's participation in the economy (see Section 2.8.2)

### **Building Positive Relations (476 characters)**

- We welcome the emphasis put on providing support to those most marginalised within communities including women, minority communities, those with disabilities and LGBT people.
- Too often women and those from other marginalised groups are not represented in public and political life and their views, needs and experiences are therefore ignored. There must be an urgent and concerted effort to increase the participation of women and other minority groups in these roles.

### **Re-imagining Communities (497 characters)**

- We wish to highlight that women are more likely to experience poverty and inequality and are therefore more likely to face social exclusion. The disproportionate impacts of welfare reform/austerity, poverty, inequality and Covid19 on women must be taken into account (see Section 2.7)
- We believe that women should have been included as a Thematic Area given their importance to peace/reconciliation work in local communities and their greater likelihood of experiencing poverty and inequality.

**Q.3 Theme 2 - Delivering Economic Regeneration and Transformation. To what extent do you agree or disagree with the Investment Areas within Theme 2?**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or Disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
<b>SME Development and Transition</b>			✓		
<b>Innovation Challenge Fund</b>			✓		
<b>Programme Area Skills Development</b>			✓		
<b>Smart Towns and Villages</b>			✓		

**Q4. Please outline your reasons for your answers in Q3 (Max 500 characters per Investment Area)**

**SME Development and Transition (415 characters)**

- There is no community element within this Investment Area.
- It is purely business focused and fails to see that work at community level also has an economic driver and is an important part of local economies.
- It mentions post Covid19 recovery but does not address the fact that women have been more economically impacted by the pandemic and therefore may need additional support to work in these organisations.

### **Innovation Challenge Fund (401 characters)**

- Once again there is no community element within this Investment Area.
- There is a need to ensure that STEM based initiatives which provide opportunities for young people from disadvantaged areas are not solely or predominately available or targeted to boys.
- There is a need to ensure that the actions to be supported under this section provide equal opportunities for girls and boys, women and men.

### **Programme Area Skills Development (498 characters)**

- We support the need for skills development and stress the importance of lifelong training/education at community level for the most marginalised (see Section 2.8.2).
- Training and education supports peacebuilding, equality and fighting poverty particularly in disadvantaged communities and funding must be targeted in these areas.
- We stress the importance of the need to address barriers to participation including childcare/caring responsibilities which are most often carried out by women.

### **Smart Towns and Villages (422 characters)**

- Once again we stress the need for this funding to be available at community level.
- The importance of community work in rural areas in addressing digital access poverty in terms of both technology and access to the internet is important work which must be funded and developed. The work carried out by rural community groups provides important benefits to mental health and reduces social isolation (see Section 2.8.4).

**Q.5 Theme 3 – Empowering and Investing in our young people. To what extent do you agree or disagree with the Investment Areas within Theme 3?**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or Disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
<b>Shared Learning Together Education Programme</b>			✓		
<b>PEACE PLUS for Youth Programme</b>			✓		
<b>Youth Mental Health and Wellbeing</b>		✓			

**Q6. Please outline your reasons for your answers in Q5 (Max 500 characters per Investment Area)**

**Shared Learning Together Education Programme (437 characters)**

- Education is vitally important in peacebuilding providing opportunities for relationship building, understanding and reconciliation. This does not only take place in formal school settings but in community based education and training also which is particularly important for those most disengaged by the formal education sector.
- We remain concerned about the lack of space for funding at community level within this Investment Area.

**PEACE PLUS for Youth Programme (499 characters)**

- We reiterate the need for training/education at community level including short courses leading to qualifications which improve employability.

- Employability programmes are essential to peacebuilding helping to build relationships and work against poverty and should be given more prominence within this funding, particularly at community level.
- In order to be effective there must be meaningful dialogue between groups. If it is a tick box exercise and there is no learning it will not work.

**Youth Mental Health and Wellbeing (497 characters)**

- The need for work on mental health is undisputed particularly coming out of the Covid19 pandemic and this must be addressed among the young. However, adult mental health is a huge issue (see Section 2.8.4) and has not been addressed within this funding.
- The voluntary and community sector do important work to address the impacts of trauma, mental health, wellbeing, poverty and deprivation in local communities. Funding must be available at community level to continue and develop this work.

**Q.7 Theme 4 – Healthy and Inclusive Communities. To what extent do you agree or disagree with the Investment Areas within Theme 4?**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or Disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
<b>Collaborative Health and Social Care</b>			✓		
<b>Rural Regeneration and Social Inclusion</b>			✓		
<b>Victims and Survivors</b>			✓		

**Q8. Please outline your reasons for your answers in Q7 (Max 500 characters per Investment Area)**

**Collaborative Health and Social Care (499 characters)**

- We do not see a space for grassroots community organisations to apply under this Investment Area but rather seems to top up the funding of statutory services.
- Health inequalities and poor wellbeing often come from living in poverty and disadvantage and we believe that this must be an important part of this work which has not been addressed within this Area.
- A huge amount of work is undertaken at community level to address poverty/deprivation and this should be properly valued and resourced.

**Rural Regeneration and Social Inclusion (419 characters)**

- We support the need for specific funding for rural communities who face increased social isolation and access poverty in relation to key services such as transport, childcare, health, etc.
- Once again, we cannot see adequate space for rural grassroots organisations to apply under this Investment Area despite their valuable work on social inclusion and tackling all kinds of access poverty including digital poverty.

**Victims and Survivors (451 characters)**

- The needs of victims and survivors are looked after not only by those organisations who work in this area. Many grassroots organisations, including Women's Centres, provide a range of services to cater for the needs of victims and survivors and are trusted spaces within local communities.
- We are concerned that those grassroots organisations who also serve the needs of victims and survivors will not be able to avail of funding in this area.

**Q9. Theme 5 – Supporting a Sustainable and Better Connected Future. To what extent do you agree or disagree with the Investment Areas within Theme 5?**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or Disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
<b>Biodiversity, Nature Recovery and Resilience</b>			✓		
<b>Marine and Coastal Management</b>			✓		
<b>Water Quality and Catchment Management</b>			✓		
<b>Water Quality Improvement Programme</b>			✓		
<b>Geothermal Energy Demonstration Programme</b>			✓		
<b>Enhanced Sustainable Travel Connectivity</b>			✓		

**Q10. Please outline your reasons for your answers in Q9 (Max 500 characters per Investment Area)**

**Biodiversity, Nature Recovery and Resilience (318 characters)**

- We support the need to protect and preserve nature, biodiversity and green infrastructure and the need to reduce pollution.
- We point to the need for a Caring Economy as outlined by the Commission on a Gender-Equal Economy which prioritises care for each other and the environment in which we live (see Section 2.9).

**Marine and Coastal Management (313 characters)**

- We support the need for the development of marine environment specific climate change mitigation and adaptation plans.
- We point to the need for a Caring Economy as outlined by the Commission on a Gender-Equal Economy which prioritises care for each other and the environment in which we live (see Section 2.9).

**Water Quality and Catchment Management (275 characters)**

- We support the need to promote access to water and sustainable water management.
- We point to the need for a Caring Economy as outlined by the Commission on a Gender-Equal Economy which prioritises care for each other and the environment in which we live (see Section 2.9).

**Water Quality Improvement Programme (275 characters)**

- We support the need to promote access to water and sustainable water management.
- We point to the need for a Caring Economy as outlined by the Commission on a Gender-Equal Economy which prioritises care for each other and the environment in which we live (see Section 2.9).

### **Geothermal Energy Demonstration Programme (481 characters)**

- We support the need to promote energy efficiency, reduce green-house gas emissions, reduce reliance on fossil fuels and increase the uptake of renewable energy sources.
- We welcome the reference to energy efficiency studies focused on areas most affected by fuel poverty.
- The poorest and most disadvantaged communities as well as small voluntary and community organisations must be able to take advantage of the energy efficiency measures provided through green technologies.

### **Enhanced Sustainable Travel Connectivity (439 characters)**

- We are concerned, once again, that there is little potential for funding at grassroots level within this Area.
- The proposals focus on the economic corridor between Belfast and Dublin but fail to see the economic drivers that may exist elsewhere. They also do not take into account the totally inadequate rural public transport in areas of Northern Ireland particularly in the West.
- Women are more likely to rely on public transport.

**Q.11 Theme 6 - Building and Embedding Partnership and Collaboration. To what extent do you agree or disagree with the Investment Areas within Theme 6?**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or Disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
<b>Strategic Planning and Engagement</b>			✓		
<b>Maintaining and Forging Relationships between Citizens</b>		✓			

**Q12. Please outline your reasons for your answers in Q11 (Max 500 characters per Investment Area)**

**Strategic Planning and Engagement (318 characters)**

- We see no place for funding at grassroots level in this Investment Area.
- The women’s sector suffers from a lack of long-term funding to allow for strategic planning and enhancing organisational capacity within the sector. The sector could greatly benefit from the ability to access funding for these areas of work.

**Maintaining and Forging Relationships between Citizens (343 characters)**

- Women’s Centres and groups have been successfully working across communities and borders for many years on community relations and peacebuilding work (see Section 2.3)

- Grassroots organisations, such as Women’s Centres, are best placed and trusted spaces for maintaining and forging relationships work between communities and across borders.

**Section C. Indicative Budget Allocations**

**Q.13 To what extent do you agree or disagree with the indicative budget allocations for the six key Themes outlined below?**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or Disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
<b>Theme 1: Building Peaceful and Thriving Communities (€210m)</b>		✓			
<b>Theme 2: Delivering Economic Regeneration and Transformation (€143m)</b>				✓	
<b>Theme 3: Empowering and Investing in our Young People (€110m)</b>		✓			
<b>Theme 4: Healthy and Inclusive Communities (€155m)</b>		✓			
<b>Theme 5: Supporting a Sustainable and Better Connected Future (€265m)</b>				✓	

<b>Theme 6: Building and Embedding Partnership and Collaboration (€47m)</b>				✓	
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**Q.14 Please outline your reasons why. (Max 500 characters per Theme)**

**Theme 1: Building Peaceful and Thriving Communities (471 characters)**

- We believe that this Theme should attract a higher proportion of the funding as it encompasses the overall objective of the Programme – to build peace and prosperity.
- We would like to see a large proportion of the available funding under this Theme go to the wider voluntary and community sector who have established working relationships, the ability to reach marginalised groups and a proven track record in this work within local communities and across borders.

**Theme 2: Delivering Economic Regeneration and Transformation (498 characters)**

- We acknowledge that economic regeneration is important especially coming out of the Covid19 pandemic we believe that this funding should be more about people and less about business organisations.
- We would like to see the funding available under this Theme deliver more for workers within these organisations increasing their skills levels and providing good quality, well paid jobs that deliver on equality. If not, then we believe this Theme should attract less of the overall funding amount.

**Theme 3: Empowering and Investing in our Young People (482 characters)**

- We suggest the amount of funding allocated to Youth Mental Health and Wellbeing is totally inadequate. Given the likely impact of the pandemic on mental health issues, the number of years over which the funding is to be provided and the geographical area it covers it is clear that this will be insufficient to make any real and meaningful difference in this area.

- We would like to see more funding under this Theme being made available to the voluntary and community sectors.

#### **Theme 4: Healthy and Inclusive Communities (494 characters)**

- We would like to see a greater share of the funding go to rural communities. Centralisation of support services has greater impacts for rural communities not just in terms of access poverty but also in terms of social isolation.
- Community-based activities and education can have very positive effects in addressing the impact of social isolation on health/wellbeing.
- We would like to see funding allocated to address poverty given that it is such a determinant of poor health and wellbeing.

#### **Theme 5: Supporting a Sustainable and Better Connected Future (380 characters)**

- While we are supportive of the need to achieve a more sustainable and better connected future we question why this Theme should attract the largest proportion of the available funding.
- We query whether this Theme will deliver as strongly on the Programme objectives of building peace and prosperity as the other Themes and so therefore warrant the largest share of the funding.

#### **Theme 6: Building and Embedding Partnership and Collaboration (499 characters)**

- We would like to see a greater share of the funding allocated to this Theme in the area of maintaining and forging relationships between citizens.
- We are strongly of the belief that more funding should be made available to support projects at grassroots level in the area of relationship building. This is the work that the community and voluntary sector is seen to do very well particularly among more marginalised communities. The sector must be valued and recognised for this important work.

**Section D. Administrative Arrangements**

**Q15. To what extent do you agree or disagree that the following proposals would help to reduce the administrative burden for applicants to the new Programme?**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or Disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
<b>Proposal to increase project development support</b>		✓			
<b>Proposal to introduce more participation and flexibility in calls for applications</b>	✓				
<b>Proposal to simplify the application process</b>	✓				
<b>Proposal to increase training opportunities for project partners</b>		✓			
<b>Proposal to make the monitoring system more user-friendly</b>		✓			
<b>Proposal to increase the use of simplified cost options</b>		✓			
<b>Proposal to increase flexibility in project management</b>		✓			

<b>Proposal to make indicators and reporting more focused on quality</b>		✓			
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**Q.16 Please outline your reasons why. (Max 500 characters per proposal)**

**Proposal to increase project development support (372 characters)**

- We are in agreement with greater support in terms of project development, application bids and assessment process. We would suggest that this should be made more available to small and more grassroots organisations who may not have the necessary resources or capacity to make bids or develop projects but who would be effective in meeting the objectives of the funding.

**Proposal to introduce more participation and flexibility in calls for applications (339 characters)**

- We would welcome more participation and flexibility in calls for applications particularly for smaller community organisations who may lack the capacity and time to make applications. The application process should not put off potential applicants no matter how small if they are in a position to do the work and achieve the outcomes.
- We welcome staggered calls for applications giving greater time to develop and submit applications.

**Proposal to simplify the application process (487 characters)**

- We can see no rationale for complex application processes, the result of which simply deters applications particularly for those organisations with limited resources and capability. Many of these organisations could be best placed to deliver this work so adding complexity only serves to keep them out of the process.
- It is imperative that the application and assessment processes are simplified and proportionate to the risk and value of projects reducing workload for all partners.

**Proposal to increase training opportunities for project partners (278 characters)**

- Simplicity and accessibility is key particularly for smaller community-based organisations who may struggle to get the time or resources to dedicate to this work. Simple and accessible training to allow for ease of management of projects is important for these organisations.

**Proposal to make the monitoring system more user-friendly (277 characters)**

- We reiterate the importance of simple and user-friendly systems for managing projects particularly for smaller community-based organisations. These organisations should be provided with all the necessary training and support to use any proposed electronic monitoring system.

**Proposal to increase the use of simplified cost options (431 characters)**

- We are supportive of any efforts to reduce the complexity of claims and evidence requirements. This is particularly onerous for small community groups who lack the staffing resources and time required to do this work.
- Complex claiming procedures and burdensome evidence requirements can act as a deterrent particularly to the delivery of smaller projects which are no less important to meeting the objectives of this Programme.

**Proposal to increase flexibility in project management (494 characters)**

- We believe that it is important to allow for flexibility in project management. Smaller community-based organisations in particular can benefit from this flexibility as they know what works best for different groups and can adapt their projects to accommodate this. They should have greater control over delivery of their projects without having to seek formal approval, adaptations made due to Covid-19 showed the creativity of organisations in delivery of projects while maintaining outcomes.

**Proposal to make indicators and reporting more focused on quality (387 characters)**

- We are in agreement with the need to shift the focus to quality rather than verification of the process. We believe that the results and outputs should be

allowed to speak for the success of projects rather than the amount of paperwork they generate. This funding must be focused on people and the quality of the outcomes for people and communities rather than the project process.

## **Section E. Equality Considerations**

**Q.17 Do you agree with the Equality screening findings for the PEACE PLUS Programme?**

- Yes
- No
- Don't Know

**Q. 18 If no, what additional actions do you think we need to take and why? (Max 1000 characters)**

We do not believe that the Equality Screening demonstrates sufficient analysis of the available evidence in relation to gender or sexual orientation. The screening shows limited use of the available evidence in relation to gender and almost completely excludes sexual orientation. We point to the comprehensive evidence outlined in the Women's Policy Group Feminist Recovery Plan<sup>54</sup> and also to the Expert Panel Reports for the four Social Inclusion Strategies in Northern Ireland which have recently been published.<sup>55</sup>

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<sup>54</sup> Covid-19 Feminist Recovery Plan, Women's Policy Group NI, July 2020

<https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>

<sup>55</sup> [Report from the Gender Equality Strategy Expert Advisory Panel | Department for Communities \(communities-ni.gov.uk\)](#)  
[Report from the Anti-Poverty Strategy Expert Advisory Panel | Department for Communities \(communities-ni.gov.uk\)](#)  
[Report from the Disability Strategy Expert Advisory Panel | Department for Communities \(communities-ni.gov.uk\)](#)  
[Report from the Sexual Orientation Strategy Expert Advisory Panel | Department for Communities \(communities-ni.gov.uk\)](#)

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We wish to caution against gender-neutrality which is a significant barrier to women's equality. This is the view that equality can be achieved by treating men and women the same or by inadequate/inappropriate use of the equality impact assessment mechanism to identify inequalities.

### **Section F. Strategic Environmental Assessment**

**Q.19 Do the findings from the Strategic Environmental Assessment (SEA) for the PEACE PLUS Programme cover all the relevant information?**

- Yes**
- No**
- Don't Know**

**Q.20 If no, what else do we need to consider and why? (Max 1000 characters)**