



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

**Response to: Budget 2023-2024 Equality Impact Assessment**

**Issued by: Department for Communities  
May 2023**

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Foyle Women's  
Information

Network



# **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

**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 Department for Communities (DfC) Budget 2023-24 Equality Impact Assessment (EQIA). As stated in the consultation document the Department provides support to *“meet the needs of some of the most disadvantaged people, families and communities across Northern Ireland”* and that the Department *“delivers a diverse range of functions that impact on the lives of everyone in our society.”*<sup>2</sup> As such the DfC is one of the Departments which is most closely aligned to the work of the Women's Regional Consortium through its work with women in disadvantaged and rural areas of Northern Ireland.

**1.5** The Budget allocation for DfC is therefore vitally important to the lives of the women, children and families who the Women's Regional Consortium works on behalf of and represents. The DfC functions cover important areas for women including around social security, employment advice and support, housing and promoting social inclusion through gender equality, anti-poverty, sexual orientation, disability, child poverty and active ageing. These issues are increasingly more and more important following a decade of welfare reform/austerity changes which have

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<sup>2</sup> <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2023-24-eqia.pdf>

impacted more on women, the worsening of existing inequalities as a result of the Covid19 pandemic, the likely adverse impacts of Brexit and an ongoing Cost of Living Crisis all of which gives rise for concern about women's equality and economic wellbeing.

1.6 We understand that the proposed cuts outlined in the EQIA are due to the constrained budget that has been imposed by the Secretary of State. We are aware that civil servants are in the unenviable position of having to make these difficult decisions with no Ministers in place. Nevertheless, we are extremely concerned about the proposed budget cuts which are outlined in this consultation document many of which seem to target those who are the most vulnerable including those on the lowest incomes many of whom will be women. We do not believe that this EQIA sufficiently addresses the gendered impact of these proposals.

**1.7 We wish to endorse the responses made by the Women's Policy Group (WPG) and the Northern Ireland Women's Budget Group (NIWBG) both of which groups the Women's Regional Consortium is represented on. The Women's Regional Consortium also endorses the following statement prepared by the NIWBG and Ulster University in response to this EQIA:**

It is important to acknowledge that the current budget process is particularly abnormal, and we understand that the budget allocations delivered by the Secretary of State are not only highly restrictive but put undue pressure on officials to make decisions they should not have to make. The abnormality of this budget cycle also means that planning procedures that occur during a typical budget process have not taken place. Without the fulfilment of these procedures, the equality screening and impact assessment consultation comes too late in the process and is inadequate for full consideration of the impact of these spending decisions on women.

Gender Budgeting requires government departments to analyse the different impact of a budget on people of different genders, starting as early in the budget cycle as

possible. The aim of gender budgeting is to ensure that the distribution of resources creates more gender equal outcomes. Over time, gender analysis should become embedded at all stages of the budget process. Women's intersecting identities are also included in this analysis and policy-makers are expected to promote these areas of equality as well. There is widespread political support for gender budgeting in Northern Ireland and a growing evidence base that it can help create a more equal society. In the current budget crisis women will experience particular disadvantages due to the pre-existing socio-economic conditions. For example, there is strong evidence that women have suffered disproportionately from over a decade of Westminster austerity measures, the pandemic, and the cost-of-living crisis<sup>3</sup>. We cannot afford to continue making decisions at the expense of women and risk further degradations to gender equality and additional intersecting equalities as well.

Not only is there an immediate need for gender budgeting in our current crisis, but the benefits would help to improve the budgetary process. Gender budgeting is good budgeting; it encourages greater transparency of government processes, more in-depth assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures will create a firewall to prevent such disproportionate disadvantages in future.

We recognise that the current equality screening and impact assessment duties under Section 75 provide policy infrastructure that could be used to progress gender

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<sup>3</sup> MacDonald, E.M. (2018) The gendered impact of austerity: Cuts are widening the poverty gap between women and men. British Politics and Policy at

LSE. <https://blogs.lse.ac.uk/politicsandpolicy/gendered-impacts-of-austerity-cuts/>

Charlton, E. (2023) This is Why Women are Bearing the Brunt of the Cost of Living Crisis According to Research. World Economic Forum. <https://www.weforum.org/agenda/2023/01/cost-of-living-crisis-women-gender-gap/>

budgeting. The EQIA process allows space to identify budget impacts on women and opportunities to promote more gender equal outcomes. However, too often the analysis included in these documents focuses only on equal treatment or stops at the point of acknowledging pre-existing inequalities. For gender budgeting to be fully implemented, the next stage must be to reformulate budgets and budgetary policy with targeted measures to improve outcomes for women and girls. Additionally, Section 75 screening and impact assessment typically takes places at the very end of the budget planning process or after the budget has been finalised. The OECD<sup>4</sup> highlights that best practice for gender budgeting is to embed it at all levels of policy- and budget-making: planning, formulation, approval, implementation, monitoring and reformulation. It is crucial that gender equality obligations are not a ‘tick-box exercise,’ but rather that gender equality is mainstreamed in every area of the budgetary process through gender analysis of data supported by experts from civil society.

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<sup>4</sup> OECD (2023), OECD Best Practices for Gender Budgeting, *OECD Journal on Budgeting*, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

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## **2.0 General Comments**

The consultation document states that this is “*the most challenging budget in recent history*” and acknowledges the backdrop against which a funding gap of £111.2m (15.5%) for the Department will take place. There is no doubt that without a functioning local Government, high inflation, pressure on wages/benefit levels and the ongoing Cost of Living Crisis that the situation is extremely concerning.

The proposed cuts will impact the most on the poorest communities in Northern Ireland and on the Section 75 groups within those categories even more. While our response focuses mainly on the negative impacts on women we point the Department to the need to consider intersectionality and the likelihood that the most vulnerable will be impacted in different ways depending on their circumstances as we have outlined in our response to Question 4.

## **2.1 Gender Inequality**

A decade of welfare reform/austerity measures which have impacted more on women, the worsening of existing inequalities as a result of the Covid19 pandemic, the likely adverse impacts of Brexit particularly in Northern Ireland and an ongoing Cost of Living Crisis gives rise for concern about a deterioration in gender equality for women. These are issues that we firmly believe must be a consideration within this EQIA.

A gender-neutral approach to policy and decision making has been the standard across Government and this has not served women well as it fails to take account of the different experiences of men and women as a result of existing gender inequalities. A failure to account for these gender dynamics means that the design of policies and budgets, and indeed cuts to budgets, can aggravate existing gender inequality and may not benefit women and men equally.

The Gender Equality Strategy Expert Panel report<sup>5</sup> highlights the harm that results from decades of gender-neutral policy making:

*“A gender-neutral policy-making approach exists in Northern Ireland and has prevented progress on tackling gender-based violence and misogyny. The issue of gender neutrality acts as a significant barrier to women’s equality and major reforms are needed in order to make progress in this area.”*

The CEDAW Committee has also cautioned on the dangers of gender neutrality. CEDAW calls for substantive equality<sup>6</sup> to go beyond paying lip service to gender mainstreaming and demonstrate the meaningful integration of an equalities perspective into all systems and policies. It states that a purely formal approach is not sufficient to achieve women’s equality with men and requires that women are given an equal start and empowered by an enabling environment to achieve equality of results. *“It is not enough to guarantee women treatment that is identical to that of men. Rather, biological as well as socially and culturally constructed differences between women and men must be taken into account.”*<sup>7</sup>

Gendered social norms restrict and limit women’s roles in the economy, thereby contributing to women’s economic disadvantage relative to men.<sup>8</sup> Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work and also more likely to be providing care either for children or other family members which limits their ability to carry out paid work. This contributes to keeping women’s incomes generally lower over their lifetimes and therefore means they are more likely to be dependent on men or the state through social security benefits.

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<sup>5</sup> Gender Equality Strategy, Expert Advisory Panel Report, December 2020  
[Gender Equality Strategy \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/gender-equality-strategy)

<sup>6</sup> General Recommendations Adopted by the Committee on the Elimination of Discrimination against Women, Thirtieth session (2004), General Recommendation No 25  
[https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1\\_Global/INT\\_CEDAW\\_GEC\\_37\\_33\\_E.pdf](https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1_Global/INT_CEDAW_GEC_37_33_E.pdf)

<sup>7</sup> Ibid, paragraph 8

<sup>8</sup> Violence against Women and Girls and women’s economic inequality, Eva Neitzert, March 2020  
<https://wbg.org.uk/wp-content/uploads/2020/07/Violence-and-womens-economic-equality.pdf>



Any decision-making, policies and budgets must recognise the different circumstances with which women and men experience systems and economies. In practice men and women are rarely in similar circumstances due to existing gender inequalities and gendered social norms. An example of this is provided by Universal Credit (UC). The Department of Work and Pensions has described its UC policy as gender-neutral. However, the Women's Budget Group<sup>9</sup> has highlighted that rather than gender-neutral aspects of UC disproportionately affect women. This includes conditionality for parents and incentives for second earners as well as using a traditionally gendered 'male breadwinner' model.

Locally, research by the Women's Regional Consortium<sup>10</sup> also analyses a number of key design features of Universal Credit which are likely to have disproportionate impacts on women including the single payment, conditionality, work allowances, childcare payments as well as the impact of the five-week wait, two-child limit and Benefit Cap on women as UC claimants.

***"In the NI Assembly they are gender neutralising everything. They don't want to address women's issues, they don't want to open doors for women, they don't see across the different types of women. They want to remove women from things – if they do something for women then they have to do it for men. They don't see the impact of Universal Credit, Covid, etc on women."***  
*(Participant at Consultation Event)*

## **2.2 Women, Poverty, Austerity and Welfare Reform**

Poverty is already an issue which impacts on the lives of many women in Northern Ireland and is harmful not only to the women themselves but to their children, families and wider communities. Women are generally more likely than men to live in poverty across their lifetimes. Lone parents (in Northern Ireland 93% of lone parents are

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<sup>9</sup> 'Gender-neutral': Universal Credit Equality Impact Assessments, Women's Budget Group, January 2019

<https://wbg.org.uk/blog/gender-neutral-universal-credit-equality-impact-assessments/>

<sup>10</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>

women)<sup>11</sup> are even more vulnerable to poverty. In Northern Ireland the family type at the highest risk of relative poverty was single parents at 34%.<sup>12</sup> Women often bear the brunt of poverty in the home managing household budgets to shield their children from its worst effects. This means that women end up acting as the ‘shock absorbers’ of poverty going without food, clothes or warmth in order to meet the needs of other family members when money is tight.<sup>13</sup>

***“As long as my two kids are fed and watered I don’t care if I eat.”***

*(Quote taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)*

Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work and also more likely to be providing care which limits their ability to carry out paid work. This contributes to keeping women’s incomes generally lower over their lifetimes and therefore puts them at greater risk of poverty. These existing gender inequalities are also likely to be further worsened due to the Cost of Living Crisis.

***“At the end of the day women and mothers are left with the burden of these issues (referring to low-incomes and poverty). They worry about these things.”***

*(Quote taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)*

The social security system has a vital role to play in easing the impact of poverty on people and families. As the Covid19 pandemic and the Cost of Living Crisis has shown, people need to be able to rely on the social security system when times get tough and they are hit by unexpected costs or lost earnings. A decade of austerity and welfare reform policies have disproportionately impacted on women. Research by the House of Commons Library shows that 86% of the savings to the Treasury

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<sup>11</sup> [Census 2021 main statistics demography tables – household relationships | Northern Ireland Statistics and Research Agency \(nisra.gov.uk\)](https://www.nisra.gov.uk/census-2021-main-statistics-demography-tables-household-relationships-northern-ireland)

<sup>12</sup> Households Below Average Income: Northern Ireland 2019/20, DfC & NISRA  
<https://www.communities-ni.gov.uk/system/files/publications/communities/hbai-2019-20.pdf>

<sup>13</sup> A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women’s Budget Group, February 2019  
<https://fabians.org.uk/a-female-face/>

through tax and benefit changes since 2010 will have come from women. It shows that, by 2020, men will have borne just 14% of the total burden of welfare cuts, compared with 86% for women.<sup>14</sup> These welfare reform and austerity measures have tended to limit the ability of the system to protect against poverty.<sup>15</sup>

Locally, an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)<sup>16</sup> showed that across most income levels the overall cash impact of the reforms is more negative for women than for men. This is particularly the case for lone parents (who are mostly women) who lose £2,250 on average, equivalent to almost 10% of their net income.

Research by the Women's Regional Consortium on the impact of austerity<sup>17</sup> and on the impact of Universal Credit<sup>18</sup> on women shows the extent to which changes to the social security system have worsened women's ability to provide for their children and families and made them more vulnerable to financial hardship and poverty. Gendered policies such as the two-child limit and Benefit Cap as well as the introduction of Universal Credit which has been described as discriminatory by design have caused many women to struggle to afford the basics and to feed and provide for their children and families.

***"It's degrading – how can I provide for my family? Kids ask can we get this, can we get that and I have to say no all the time."***

*(Quote taken from Women's Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)*

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<sup>14</sup> Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017

<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

<sup>15</sup> Protecting dignity, fighting poverty and promoting social inclusion in devolved social security, Dr Mark Simpson, Ulster University, June 2018

[http://www.niassembly.gov.uk/globalassets/documents/raise/knowledge\\_exchange/briefing\\_papers/series\\_7/simpson060618.pdf](http://www.niassembly.gov.uk/globalassets/documents/raise/knowledge_exchange/briefing_papers/series_7/simpson060618.pdf)

<sup>16</sup> Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019

[https://www.nihrc.org/uploads/publications/Final\\_CIA\\_report\\_Oct\\_2019.pdf](https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf)

<sup>17</sup> Impact of Ongoing Austerity: Women's Perspectives, Women's Regional Consortium, March 2019

<http://www.womensregionalconsortiumni.org.uk/sites/default/files/Impact%20of%20Ongoing%20Austerity%20Women%27s%20Perspectives.pdf>

<sup>18</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>

Concerns about austerity measures have been raised internationally by the CEDAW Committee. Following its recent examination of the UK, the CEDAW Committee raised concerns about the impact of austerity measures on women stating its concern about the *“disproportionately negative impact of austerity measures on women, who constitute the vast majority of single parents and are more likely to be engaged in informal, temporary or precarious employment.”*<sup>19</sup> The Committee recommended that the UK government *“undertake a comprehensive assessment on the impact of austerity measures on the rights of women and adopt measures to mitigate and remedy the negative consequences without delay.”*<sup>20</sup>

Addressing women’s disadvantage in the economy requires action to ensure that women are able to be economically independent not only through paid work but also including through a properly supportive social security system which provides a safety net when women are not able to work. It is important that proposals around cuts recognise the contextual factors which increase women’s vulnerability to poverty. These include high rates of female economic inactivity, no childcare strategy, high number of women with adult care responsibilities, a weak labour market, high number of women working part-time and in precarious jobs and wages lower than the UK average.<sup>21</sup>

***“The benefits system doesn’t help people to go out and seek work. The jobs women do are often the lowest paid. If they leave benefits for low paid work they just end up getting further into the poverty trap.”***  
(Participant at Consultation Event)

Women’s poverty is especially harmful because of the strong links between female poverty and child poverty. A report by Loughborough University for the End Child

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<sup>19</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 17)  
[https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8%20&Lang=En](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8%20&Lang=En)

<sup>20</sup> Ibid, para 18

<sup>21</sup> Shadow report for the examination of the UK by the Committee on the Convention to Eliminate Discrimination against Women, NIWEP, January 2019

Poverty Coalition<sup>22</sup> gives cause for concern around rising child poverty levels. The data in the report is for the year ending March 2022 so does not cover when the Cost of Living Crisis really took hold or the impact of rising inflation on the costs of food and fuel. The statistics show that more than one in five children (22.5%) live in poverty in Northern Ireland after housing costs and 37% of children in lone parent households (mostly women) live in poverty.

### **2.3 Welfare Reform Mitigations**

In Northern Ireland a package of mitigation measures was agreed by the Northern Ireland Executive to protect some claimants from the harshest impacts of welfare reform.<sup>23</sup> The New Decade, New Approach agreement<sup>24</sup> committed to both extending existing mitigations in Northern Ireland beyond March 2020 when they were due to run out and to carry out a review of the mitigation measures.

The independent Welfare Mitigations Review Report<sup>25</sup> has recommended retaining the existing mitigations for the Benefit Cap and the Bedroom Tax and a number of new mitigations for Northern Ireland including offsetting the two-child policy and help during the Universal Credit five-week wait. Their recommendations to strengthen the mitigations package target households on a low income and those containing an adult and/or a child with a disability alongside benefitting women in particular.

The Cliff Edge Coalition<sup>26</sup> is campaigning for the strengthening of the mitigations package in Northern Ireland. The campaign has three key asks which would help to strengthen the social security system and provide important protections against

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<sup>22</sup> Local indicators of child poverty after housing costs, 2021/22, Loughborough University, June 2023 [https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Local-indicators-of-child-poverty-after-housing-costs\\_Final-Report-3.pdf](https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Local-indicators-of-child-poverty-after-housing-costs_Final-Report-3.pdf)

<sup>23</sup> Welfare Reform Mitigations Working Group Report, Professor Eileen Evason, January 2016 <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/welfare-reform-mitigations-working-group-report.pdf>

<sup>24</sup> New Decade, New Approach, January 2020 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/856998/2020-01-08\\_a\\_new\\_decade\\_a\\_new\\_approach.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf)

<sup>25</sup> [Welfare Mitigations Review \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/welfare-mitigations-review)

<sup>26</sup> The Cliff Edge Coalition NI is a group of over 100 organisations from across Northern Ireland who came together to express concerns about the end of welfare reform mitigations in March 2020. The Women's Support Network is a Coalition member.

poverty especially for those most impacted.<sup>27</sup> These are working to resolve the five-week wait in Universal Credit, mitigating the two-child limit and providing support to private renters affected by the Local Housing Allowance.

We believe these mitigations would provide vital protections for the people of Northern Ireland especially for the many women who have been so adversely affected by welfare reform policies. They are even more necessary in the context of the Cost of Living Crisis which like any other economic crisis tends to hit women harder.

We are firmly of the belief that strengthening the mitigations package is essential to provide protection from financial hardship and poverty and also to help with economic recovery. Money provided through benefits is spent in local economies, therefore strengthening the mitigations package increases the amount of money available to spend, increasing demand at a time when action is needed to create jobs and revive local businesses. Investing in the benefits system to help people get through the Cost of Living Crisis is a sensible approach.

We are very concerned that the EQIA provides no New Decade New Approach allocation to deliver on commitments made to fund new mitigations including offsetting the two-child policy which is likely to have a harsher impact in Northern Ireland due to larger average family sizes compared to GB. We also remain very concerned about the impact of the Universal Credit five-week wait particularly on low income families and women. Our research with women<sup>28</sup> clearly shows its very negative impacts and along with our colleagues in the Cliff Edge Coalition we have called on Government to mitigate the impact of the five-week wait.

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<sup>27</sup> <https://www.lawcentreni.org/wp-content/uploads/2023/04/CEC-Full-Member-Briefing-May-2023-.pdf>

<sup>28</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>

***“I just think it is a shambles the way Universal Credit is structured. I only get money for two of my children and nothing for the baby. The only money I get for the baby is Child Benefit.”***

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

## **2.4 Access to Independent Advice**

Women’s Regional Consortium research on the impact of austerity/welfare reform on women<sup>29</sup>, women and debt<sup>30</sup> and the impact of Universal Credit on women<sup>31</sup> all highlighted the importance of access to free, independent advice. Given the impact of austerity/welfare reform, the complexity of the benefits system, the impact of Covid19 and the Cost of Living Crisis as well as issues around poor financial literacy and capability there has never been a greater need for access to independent advice. The Women’s Regional Consortium has consistently recommended the need for increased funding for community level information, advice and advocacy work that reaches out to those who are the most vulnerable and marginalised to ensure they can access the advice they need and their rightful entitlements.

***“A lot of the letters are confusing, it’s the way they word things and I don’t understand them. I panic and worry about what they mean so I need help.”***

***“People need advice and they are cutting funding for advice when people need it. People need to get independent advice from someone that understands the system.”***

*(Quotes taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)*

## **2.5 Employment Support**

Northern Ireland has the highest rate of economic inactivity of the twelve UK regions and the Northern Ireland rate has been consistently higher than the UK average over

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<sup>29</sup> Impact of Ongoing Austerity: Women’s Perspectives, Women’s Regional Consortium, March 2019  
<http://www.womensregionalconsortiumni.org.uk/sites/default/files/Impact%20of%20Ongoing%20Austerity%20Women%27s%20Perspectives.pdf>

<sup>30</sup> Making Ends Meet: Women’s Perspectives on Access to Lending, Women’s Regional Consortium, February 2020  
<http://www.womensregionalconsortiumni.org.uk/sites/default/files/Making%20Ends%20Meet%20-%20Women%27s%20Perspectives%20on%20Access%20to%20Lending.pdf>

<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>



the last 15 years. The Northern Ireland economic inactivity rate is 26.2% which is 5.1 percentage points above the overall UK rate (21.1%).<sup>32</sup>

The female economic inactivity rate is 30.4% compared to 22% for men.<sup>33</sup> In looking at the detail of economic inactivity it shows that around a quarter of women who were unavailable for work gave the reason for inactivity as family/home care (43,000 or 24%) and this was the least likely reason for male inactivity (at 9,000 or 7%).<sup>34</sup> This is an important consideration in terms of employment support as women are therefore in need of increased employment support in order to be able to move into and stay in work. It is evident that some form of childcare support tied to schemes helping women back into work would be beneficial specifically to address this area of economic inactivity which has been so high for many years.

## 2.6 Childcare

The Census shows that approximately 29% of households in Northern Ireland have dependent children.<sup>35</sup> Childcare is the biggest monthly bill faced by 34% of families in Northern Ireland costing more than their mortgage or rent payments and for 57% of parents their childcare bill is their largest or second largest monthly outgoing.<sup>36</sup> Research by Employers for Childcare<sup>37</sup> in Northern Ireland shows that the average cost of a full-time childcare place equates to 34% of the median household income. This is amongst the highest in the OECD countries. The World Economic Forum found that UK parents pay the highest childcare costs in Europe and the second highest in the world.<sup>38</sup>

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<sup>32</sup> Northern Ireland Labour Market Report, NISRA, April 2023  
[Northern Ireland Labour Market Report \(nisra.gov.uk\)](https://www.nisra.gov.uk/northern-ireland-labour-market-report)

<sup>33</sup> Ibid

<sup>34</sup> Labour Force Survey Tables – April 2023, Table 2.4a Economic inactivity by reason, aged 16 to 64, numbers and rates

[Labour Market Report – April 2023 | Northern Ireland Statistics and Research Agency \(nisra.gov.uk\)](https://www.nisra.gov.uk/labour-market-report-april-2023)

<sup>35</sup> [Census 2021 main statistics demography tables – household relationships | Northern Ireland Statistics and Research Agency \(nisra.gov.uk\)](https://www.nisra.gov.uk/census-2021-main-statistics-demography-tables-household-relationships)

<sup>36</sup> Northern Ireland Childcare Survey 2021, Employers for Childcare, November 2021  
<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2021/>

<sup>37</sup> Ibid

<sup>38</sup> <https://www.weforum.org/agenda/2019/04/these-countries-have-the-most-expensive-childcare/>



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.

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>39</sup> The Committee recommended that Government should ensure the availability of affordable and accessible childcare particularly in Northern Ireland.<sup>40</sup>

The availability of accessible, affordable childcare is a key consideration for women’s equality, financial independence, ability to access education and training and women’s participation in the economy.

***“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 Women’s Sector Funding**

Independent analysis by Alma Economics for the Women’s Budget Group, shows that the benefits generated by Women’s Centres outweighs the cost across different funding scenarios. The analysis found that a hypothetical Women’s Centre provided with a £1m investment could generate £2.75m in socio-economic benefits, including savings for frontline public services and significant gains for approximately 650

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<sup>39</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>40</sup> Ibid, para 46

women and their children.<sup>41</sup> While this research is not specific to Northern Ireland it shows the return on investment provided by Women's Centres.

In Northern Ireland the DfC is an important source of funding for the women's sector. The Department funds/part funds core positions through the Community Investment Fund (CIF), the Neighbourhood Renewal Fund, the Women's Centres Childcare Fund (WCCF) and the women's strand of the Regional Infrastructure Support Programme (RISP).

### **2.7.1 Funding for Women's Centres and the Women's Regional Consortium**

The services delivered by Women's Centres and groups across Northern Ireland provide a lifeline to local people. They provide wrap-a-round services that support not only the woman but the whole family. Services include personal development and confidence building, trauma counselling, adult training & education, advocacy for vulnerable adults, programmes and initiatives that support families and/or tackle addictions in addition to providing a full range of childcare and early education.

In addition to the range of services provided in Women's Centres, these are trusted local organisations that women and families are more likely to turn to or accept being referred to for support and advice at times of stress and difficulty, particularly during the current Cost of Living Crisis which has seen unprecedented levels of need and demand for services. Frontline services delivered through these organisations complement current statutory provision ensuring that the objectives and outcomes of strategies, programmes and policy frameworks for Northern Ireland are met in relation to children and families.

In order to be able to deliver community-based frontline services in disadvantaged and rural areas women's centres and groups must secure a cocktail of funding, often from different departments either directly or through their agencies. However, levels of funding were static since 2012 and were subject to austerity cuts (2016/17, 2017/18) which resulted in little or no funding for overheads and in some cases a

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<sup>41</sup> [The Case for Sustainable Funding for Women's Centres - Womens Budget Group \(wbudgetgroup.org.uk\)](https://wbudgetgroup.org.uk/)

reduction in funded staff hours. In addition to the cuts, over this period the Living Wage has increased, employee pensions have been introduced and contributions raised which has increased substantially the gap between what was originally funded and what can actually be covered now. DfC, in response to the Cost of Living Crisis and as a fair wage employer did make increases to organisational budgets in 2022/23, with a further 2% increase for salaries planned for 2023/24. However, this increase will not now happen as funding has only been awarded for the first three months of 2023/24 at the 2022/23 budget rates.

The Women's Regional Consortium is funded by the DfC in partnership with DAERA through the Regional Infrastructure and Support Programme (RISP). The Consortium provides thematic regional support for women's sector organisations across Northern Ireland, which meet the needs of marginalised and isolated women in disadvantaged and rural areas. The seven women's organisations that make up the Consortium work in partnership to provide specialist support, advice, information and training on a range of topics to increase capacity, skills, physical resources and structures to benefit women and undertake research on issues that are impacting women such as Universal Credit, Childcare and Welfare Reform.

The Consortium also operates as the link and point of contact between government and the sector to ensure women on the ground have their voices heard through consultations, surveys and policy developments that impact on women. In the last year alone the Consortium have responded to nine consultations and calls for evidence, published a research paper on Women and Debt and is about to publish another research paper on Women and the Cost of Living Crisis. The Consortium have also brought the lived experience of local women and their views to the development of both the Gender Equality and Anti-Poverty Strategies. Funding for the Consortium has also been significantly reduced due to austerity measures.

These vital services delivered locally by community organisations such as Women's Centres and supported by the work of the Women's Regional Consortium are vital to tackling disadvantage and promoting gender equality. These local services which

support statutory provision are the most cost effective way of ensuring that local needs are met and ensures the best outcomes for the communities they service. Much greater value must be placed on these unique and trusted services.

The quotes below all taken from Women's Regional Consortium research with local women on the impact of the Cost of Living Crisis (not yet published) show the importance and value of the Women's Centres in the lives of these women.

*“Without Atlas Women’s Centre I don’t know where I’d be. It’s literally a godsend. At Christmas they helped me with food and toy parcels. They were able to give me vouchers for heating and electric too.”*

*“I’d be screwed if I didn’t have Ballybeen Women’s Centre. They can sort out foodbank vouchers, they can sort out gas and electricity vouchers. They can help with so much even just making phone calls on your behalf, filling in forms, etc. Anything to do with my son – I wouldn’t be where I am without their help. They helped me get my child statemented, he has so many health professionals involved and one phone call from the Centre and they helped to sort it all out.”*

*“I come to Chrysalis Women’s Centre so I’m not putting my own heat on. I’m very grateful to the Centre it provides amazing support to me both in the things they do and being able to come here. It’s a safe and welcoming space.”*

*“Footprints Women’s Centre have been brilliant with us. They organise events and bring in holistic therapies and that’s good for your mental health and stress management. It’s a place where you can come and meet other women, have a wee cup of tea and it doesn’t cost you anything – so many women can’t go out as they can’t afford it now.”*

*“Shankill Women’s Centre has been invaluable for me, the last few years have been really tough and I’ve been awful lonely and isolated. Coming here for classes you feel a sense of belonging, I’ve made new friends. You have to do something, I wasn’t going out at all. To come here was great.”*

### **2.7.2. The Women’s Centres Childcare Fund (WCCF)**

This fund was established in April 2008 and followed on from the Children and Young Peoples Fund (C&YPF) as part of an emergency Departmental response to ensure key childcare services provided in women’s centres operating in

disadvantaged communities were kept open pending an Executive decision about their future funding.

This fund enables Women's Centres to provide childcare places that are 100% supported for the most disadvantaged children and families. These sessional places ensure that while their mother/carer avails of services including training and education children have an opportunity to experience a childcare setting, to socialise, interact, play and learn in a supported environment.

For some women (especially ethnic minorities and lone parents) the prospect of increased economic participation, employment and reduction of the adverse effects of poverty 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.

WCCF contributes to reducing child poverty, provides opportunities for parents to better themselves and contributes to their communities thereby tackling disadvantage. As such the WCCF strongly aligns with a number of government strategies including: the Child Poverty Strategy, the Anti-Poverty Strategy and the Gender Equality Strategy. It also aligns with one of the immediate priorities of the Executive: *'Delivering a fair and compassionate society that supports working families and the most vulnerable'* as detailed in New Decade, New Approach.<sup>42</sup>

Whilst DfC has no policy responsibility to provide regional childcare in Northern Ireland, the rationale to continue to provide funding through the WCCF is the

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<sup>42</sup> New Decade, New Approach, January 2020

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/856998/2020-01-08\\_a\\_new\\_decade\\_a\\_new\\_approach.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf)

contribution that it makes to reducing child poverty. It therefore directly contributes to meeting the Department's strategic priority of:

*“Tackling disadvantage and promoting equality of opportunity by reducing poverty, promoting and protecting the interests of children, older people, people with disabilities, and other socially excluded groups; addressing inequality and disadvantage.”<sup>43</sup>*

Despite the importance of this childcare offering in tackling disadvantage and promoting equality WCCF continues to be administered on an annual basis and has been subject to Departmental cuts/austerity measures since 2012 which has seen the overall allocation reduced by just over 20% in that period. The Women's Regional Consortium believes that this is a hugely important area of funding for the department. We argue that any progress on childcare provision in Northern Ireland must recognise the need for low cost/no cost childcare provision for marginalised women in disadvantaged and rural areas. The Consortium also believe that government should recognise the case for properly sustaining this model on a ring-fenced, protected basis to tackle poverty and inequality, given the Fund's positive evaluation<sup>44</sup> in terms of need, impact and value for money.

***“I can only do a course if it has childcare available.”***  
*(Participant at Consultation Event)*

### **2.7.3. Community-based training and education**

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 takes account of the complexity of women's lives and the barriers they face in accessing training and education such as childcare,

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<sup>43</sup> <https://www.communities-ni.gov.uk/about-department-communities>

<sup>44</sup> Evaluation of Regional Support Arrangements for the Voluntary and Community Sector, Final Report, June 2015, DSD and DARD

transport and course costs. Women's centres and groups provide wrap-around support services that address these barriers to training and employment.

Women's exclusion from participation in the workforce 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.

Historically, community based training and education has relied heavily on European funding through the Peace Programme and the European Social Fund (ESF). Initially 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) to provide locally based opportunities for women that addressed barriers to participation. However, the levels of funding provided specifically for women only programmes have been steadily declining from 2007. The final call for ESF (2021) resulted in only 8.2% allocated to women only organisations and this has now been reduced further with only 3.7% being awarded to women's organisation through the UK Shared Prosperity Fund (UKSPF) which was set up by the UK Government to replace European funding post-Brexit.

The Women's Regional Consortium believes that investing in community-based training and education and integrated childcare is an important factor in enabling low income households to access the training and education they need to make the move into work. Once again this should be an important consideration within this EQIA to address poverty, inequality and the high economic inactivity figures especially for women.

***“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)*

### 3.0 Specific Questions and Comments on Assessment of Impacts

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

We are generally concerned about a lack of gender disaggregated data an issue that has been raised in the Gender Equality Strategy Expert Panel Report which stated: “*the lack of robust, disaggregated data is a major challenge.*”<sup>45</sup> This lack of data in relation to gender makes it difficult to fully assess and address objective need. Without access to data disaggregated by gender and across all the Section 75 groups analysis of impact and intersectionality issues is made more difficult. It is also vital in determining where actions should be directed to effectively address inequalities.

We note in particular the following data gaps which make it difficult to assess the impacts in relation to gender:

- Universal Credit statistics are not currently broken down by gender. However, latest figures available show 37% of Universal Credit claimants were lone parents (the majority of lone parents are women).<sup>46</sup>
- The consultation document notes that it “*does not collect information on dependents*”. This suggests there is no gender disaggregated data about those with dependents in Northern Ireland.
- There is no Wealth and Assets survey in Northern Ireland which provides information on the distribution of wealth according to gender.

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<sup>45</sup> Gender Equality Strategy Expert Advisory Panel Report, December 2020  
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

<sup>46</sup> Northern Ireland Benefits Statistics Summary, DfC & NISRA, November 2022  
<https://www.communities-ni.gov.uk/system/files/publications/communities/benefit-statistics-summary-nov-2022.pdf>



**2. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in section 7 of the EQIA Consultation document? If so, what are they?**

We welcome the fact that section 7 of the EQIA consultation document acknowledges the adverse impacts for women in a number of areas including in terms of barriers to employment and economic participation, employment support, childcare and the welfare mitigations.

However, we are concerned that despite the fact that the adverse impacts have been highlighted in these areas, in most cases, mention of impacts on women are accompanied by an impact on men. While it is true that in some of these areas men will also be impacted, women will suffer greater adverse impacts than men due to the gendered social norms and an increased likelihood of poverty as we have highlighted in Sections 2.1 and 2.2. This suggests that the Department will take a default 'gender neutral' approach in these areas which does not address the adverse impacts which will be experienced by women. It is vitally important that the Department recognises these contextual factors which increase women's vulnerability to poverty and which impact on their participation in the economy in making decisions around budget cuts.

We will address some of the headings within Section 7 of the EQIA consultation document in turn in relation to adverse impacts:

**Actions already taken to live within 2022-23 Budget:**

- **Robust vacancy control so as not to increase the Department's overall headcount, despite resource pressures and critical vacancies**  
– this is likely to have impacts on people needing help with social security benefits and employment support who are often the most vulnerable and marginalised. We suggest that women are more likely to be impacted by these pressures on staffing levels as they are more likely to claim social security benefits, more likely to be in low-paid, part-time work and the economic inactivity figures for women are consistently higher.

- **No additional investment in Employment Programmes, despite high levels of economic inactivity and the largest disability employment gap in the UK** – the Department has rightly highlighted that a lack of investment in employment programmes will impact more on people with disabilities which is hugely concerning given Northern Ireland has the largest disability employment gap in the UK. While the Department points to the high levels of economic inactivity here we suggest that this will have greater impacts for women also who are consistently more likely to be economically inactive than men.
- **No funding to Executive and New Decade New Approach commitments, including Social Inclusion strategies and associated legislation** – the suite of Social Inclusion Strategies is an attempt to address poverty and inequality in a range of areas and it is extremely concerning that no funding has been allocated to these despite being committed to in the New Decade New Approach Agreement. It was clear from each of the Expert Panel Reports on the Social Inclusion Strategies the urgent need to address existing inequalities and therefore a lack of funding to progress these will have adverse impacts across all the Section 75 groups. This is a huge concern for the future and community and voluntary organisations have long been calling for these Strategies to be fully funded and implemented to enable long-term planning and accountability and to ensure that much needed progress is made on these important issues.

## **Potential Impact of Proposals:**

### **i. Social Security Delivery**

#### **Universal Credit**

The consultation document states that the caseload for Universal Credit remains high as a result of the pandemic. Stopping recruitment means operating “*insufficient staffing levels which is presently impacting on operational benefit delivery areas.*”

The document also states that in the longer-term this could lead to delays in benefit payments and place customers in financial hardship.

Research by the Women's Regional Consortium on the Impact of Universal Credit on Women<sup>47</sup> highlighted a range of design flaws with Universal Credit including the five-week wait, problems with Advance Payments, the online nature of the benefit, how childcare costs are paid, the single payment, the rigidity of Universal Credit assessment periods and increased conditionality and sanctions. Many of these problems are likely to have greater impacts for women.

This research found that almost all of the women reported negative impacts due to the five-week wait for Universal Credit. Many had needed to borrow money from family members/friends (61%) or lenders (25%) to survive. Some had been forced to cut back on food/essentials to make ends meet (53%) and others had resorted to selling their possessions (18%) or using a foodbank (21%). The personal impacts of the five-week wait were severe with 89% of the women suffering stress/anxiety as a result of the wait and the worry about how they would provide for their families. Sadly, some of the women reported that the five-week wait had impacted negatively on their children (39%) or that they had felt cold/hungry (30%) due to a lack of money.

With these figures in mind it is simply unconscionable to accept that the initial wait would be lengthened in any way as a result of staff shortages within the Department to process and pay Universal Credit. This will have significant impacts for Universal Credit claimants making the application process even more difficult and causing increased financial hardship, worry and debt.

The Women's Regional Consortium and our partners in the Cliff Edge Coalition have called for action to resolve the five-week wait in Universal Credit.<sup>48</sup> The EQIA document makes it clear that any strengthening of the mitigations package has not been allocated within this Budget settlement. This will have implications for

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<sup>47</sup> The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020 <https://womensregionalconsortiumni.org.uk/wp-content/uploads/2021/04/September-2020-The-Impact-of-Universal-Credit-on-Women.pdf>

<sup>48</sup> Cliff Edge Coalition, Member Briefing, May 2023 <https://www.lawcentreni.org/wp-content/uploads/2023/04/CEC-Full-Member-Briefing-May-2023-.pdf>

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Universal Credit claimants particularly women who are more likely to claim benefits and who are more likely to be in low-paid, part-time work.

It is difficult to quantify the impact of these issues on women as Universal Credit statistics are not currently broken down by gender. However, latest figures available show 37% of Universal Credit claimants were lone parents (the majority of lone parents are women).<sup>49</sup> We believe that this likely reduction in staffing levels will have particular adverse impacts for women for all the reasons already outlined in this response.

***“We had to wait 6-7 weeks on the first payment of UC and it was an absolute nightmare. We really struggled. We had to go to the foodbank and call St Vincent de Paul for help.”***

***“Not getting anything for 5 weeks during the wait is a disgrace. Do they really think kids don’t need to eat or be warm for that time?”***

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

We are also extremely concerned about references to increasing debt stock in this consultation document. With reference to prioritising new benefit claims it states that this will lead to *“slippage in lower priority areas, such as debt referrals and increase the overall debt stock.”*

Women’s Regional Consortium research on Women Living with Debt<sup>50</sup> has shown that debt was a feature of the lives of many of the women who took part in the research. The research found that 60% of the women reported having difficulty meeting their repayments and/or missing repayments, 35% of the women reported having to use a foodbank as a result of their debts and trying to make ends meet, 75% reported their debts had been impacted by changes to social security benefits

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<sup>49</sup> Northern Ireland Benefits Statistics Summary, DfC & NISRA, November 2022  
<https://www.communities-ni.gov.uk/system/files/publications/communities/benefit-statistics-summary-nov-2022.pdf>

<sup>50</sup> Women Living with Debt, Women’s Regional Consortium, September 2022  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

or other issues. 60% of the women reported their debts had been impacted by rising energy prices, 60% reported an impact of rising food prices and 26% of the women reported the Universal Credit cut had impacted on their debts. 72% of the women reported being negatively impacted by being in debt with most reporting issues around their mental health and wellbeing as well as a struggle to pay essential bills and provide for children. Many felt they had little chance of escape from their debt situation.

Women are particularly vulnerable to debt as their incomes are generally lower as a result of reduced working hours, precarious working patterns and the impact of caring responsibilities. This reduced income can leave them more likely to have to borrow often for essential items. For some groups of women, such as single parents, the likelihood of being in debt is even greater.

Given these findings and the greater likelihood for women to be in debt we are worried that staffing pressures will lead to increasing debt levels. This is particularly concerning during a Cost of Living Crisis where increasingly women are finding it difficult to make ends meet and provide for their children and families on social security benefits or in low paid work. Indeed, the research found that increases in the cost of living were the issue most commonly reported as impacting on the women's debts and on their ability to make ends meet more generally.

***“Sometimes I struggle between turning the heating on and feeding the kids. As a mother you’d go without to make sure the kids have what they need. I’ve made dinner sometimes and there hasn’t been enough for everyone so I’ve lied and said it’s alright I’ve eaten so that I can try and make it stretch.”***

***“Some weeks I either get electric or gas but I can’t get both. Some weeks I just have to put coats on and use hot water bottles for heat. I use about three to keep me warm. If I prioritise the electric then I go without heat. I am struggling with the increases in the energy bills especially electric which has more than doubled for me. I use a meter and before it was around £5/week I’m now putting in £15/week.”***

***“There are nights I’ve sat and cried when no one else is around worrying how I’m going to cope with my debts. The next day you just have to get up and get on with it. If I fell apart the whole house would fall apart.”***

*(Quotes taken from Women’s Regional Consortium Research on Women Living with Debt, September 2022)*

The Women’s Regional Consortium also wish to raise concerns about possible increases in paramilitary lending in Northern Ireland.<sup>51</sup> We believe that there are a range of external factors which can drive people to use paramilitary lending as well as other forms of illegal lending including the impact of the Covid19 pandemic, welfare reform/austerity policies and cost of living increases. The impact of all these issues coming together has helped to create a perfect storm where those on the lowest incomes are struggling to make ends meet and are therefore more likely to be driven towards this type of lending as they are unlikely to be able to source the money they need elsewhere.

In addition, research by the University of Ulster found that Universal Credit was repeatedly described as a driver for illegal lending<sup>52</sup> particularly around the harm caused by the five-week wait and issues with short-term benefits loans that were repaid from future benefits. This ensured that benefit claimants were often short of the funds they needed to support their household leading them to look to other means of getting the money they needed. Research by the Trussell Trust<sup>53</sup> has concluded that the minimum five-week wait for Universal Credit has led to acute and immediate financial hardship and worsened households’ longer-term financial resilience. This included signs of indebtedness (multiple debts, high-risk loans, suspended utilities).

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<sup>51</sup> Women’s Regional Consortium response to the NI Affairs Committee Call for Evidence on the effect of paramilitaries on society in Northern Ireland, May 2022

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/05/Womens-Regional-Consortium-response-to-NI-Affairs-Committee-Call-for-Evidence-on-Paramilitaries.pdf>

<sup>52</sup> Illegal Money Lending and Debt Project, Research Report of Findings, Ulster University and the Consumer Council, March 2020

[Illegal Money Lending Report.PDF \(consumercouncil.org.uk\)](https://www.consumer-council.org.uk/wp-content/uploads/2020/03/Illegal-Money-Lending-Report.pdf)

<sup>53</sup> #5WeeksTooLong, Why we need to end the wait for Universal Credit, The Trussell Trust, September 2019

[PolicyReport\\_Final\\_ForWeb.pdf \(trusselltrust.org\)](https://www.trusselltrust.org/wp-content/uploads/2019/09/PolicyReport_Final_ForWeb.pdf)

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In light of all the concerns detailed above on increasing debt levels, and in particular dangerous forms of lending such as paramilitary lending, it gives real cause for concern to see the Department refer to the likelihood of an increasing debt stock. We suggest that particularly during a Cost of Living Crisis where budgets are so stretched that more investment is needed in debt referrals and in the administration of social security benefits and not less.

We also wish to stress that not only is there a need for sufficient staffing levels within the Department to better support people with the complexity of the benefits system and with Universal Credit but there is equally a need for sustainable, long-term funding for voluntary and community sector partners to help with this work. We suggest that there is an increasing need for independent advice (as we have outlined in Section 2.4) and funding for trusted community based organisations, like Women's Centres, who are often able to reach those who are the most marginalised (see Section 2.7). Providing funding to Women's Centres ensures that women can access wraparound services and get the information, advice and support they need in a way that is accessible to them and often in ways that the Department may not be able to deliver.

### **Move to Universal Credit**

The successful managed migration of around 250,000 legacy benefit claims to Universal Credit in Northern Ireland should call for a significant investment of resources. Moving to a new benefit often causes concern, questions and problems with the process particularly given the fact that Universal Credit is largely online – this suggests the need for greater levels of support not less. We note with concern that the consultation highlights the possibility of 55,000 Tax Credit claimants losing access to welfare support if they are not migrated to Universal Credit. The document also outlines that the aim to progress the move to Universal Credit with the existing staff complement is *“not without significant risk”* and will further adversely impact on service delivery.

We refer the Department to Advice NI's recently published report 'The Move to

Universal Credit: Get Ready'.<sup>54</sup> This report highlights the concerns of legacy benefit claimants about moving to Universal Credit. 71% of claimants were concerned about managing financially including the impact of the five-week wait and getting into debt, upfront childcare costs, etc. 47% were concerned about their ability to cope with the digital process and online journal, confusion and lack of certainty about the process. These statistics illustrate the need for increased staff resources and support to ensure that claimants do not lose access to vital welfare support which is even more crucial in a Cost of Living Crisis.

We wish to reiterate that it is not only about having sufficient Departmental staff to administer the move to Universal Credit. It is vitally important that funding is also provided to community and voluntary sector partners to provide help to people in the format they need to make the move to Universal Credit. Community and voluntary sector organisations are often best placed to reach those who are the most vulnerable and who need the most help with complex issues such as the move to Universal Credit. Women's Centres, for example, provide trusted local spaces where women can address the issues and can access information, advice and support in the way that best works for them.

***“My kids got free school meals for the first time since I started work because Greenway Women’s Centre helped me to fill in the form and with their help I sent in the right documentation.”***

*(Participant at Consultation Event)*

We have already outlined our concerns about delays to benefit payments, financial hardship caused to claimants and increases in debt stock and the likely adverse impacts particularly for women who are more likely to claim benefits, more likely to be in low-paid, part-time work and who are more likely to be in debt and to live in poverty across their lifetimes.

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<sup>54</sup> The Move to Universal Credit: Get Ready, Advice NI, May 2023  
<https://www.adviceni.net/policy/publications/move-universal-credit-get-ready>

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## **Health Assessments**

The EQIA document highlights a significant increase in health-related claims during the Cost of Living Crisis which has increased demand for health assessments. The document raised impacts including a diminished service leading to increased backlogs, waiting times and the possibility of benefits not being received by some of the most vulnerable in our society particularly people with a disability or health condition and older people.

We have concerns about the impact of the Cost of Living Crisis on women. Research carried out by the Women's Regional Consortium (not yet published) highlights how women act as the shock absorbers of poverty in the home going without food, heat and clothes to protect their children and other family members when money is tight. The research shows that 78% of the women reported that they had felt cold or hungry or both as a result of cost of living increases. 90% of the women felt that cost of living increases had impacted on their physical or mental health or both. Our research would indicate that many women are feeling the negative impacts of the Cost of Living Crisis on their lives and this has the potential to result in an increase in health-related claims from women.

It would be helpful to have access to disaggregated data around the increases in health-related claims to accurately determine the full range of impacts (including on gender) of a diminished service in this area.

## **Close Departmental Offices 1 day a week**

The consultation document suggests closing departmental offices one day per week but notes concerns about the impact on frontline customer service delivery especially for those who are the most vulnerable who require face to face support. The document rightly notes that this may impact on people with a disability and older people.

We suggest that this will adversely affect people who are suffering from mental health problems who are more likely to need intensive and face to face support.

Figures from the Department of Health<sup>55</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. Research shows that women are more likely to suffer from depression than men<sup>56</sup> with 22% of men and 28% of women over 65 suffering from depression.<sup>57</sup>

We also believe that this could potentially also impact on those suffering from anxiety but who may not have an official diagnosis. Women's Regional Consortium research (not yet published) with women on the impact of the Cost of Living Crisis shows increased levels of anxiety about making ends meet, financial hardship and debt. Many of the women are unable to cope with issues beyond the day to day needs of providing for themselves, their children and families. They need additional help to navigate complex processes such as benefits systems and the move to Universal Credit. Many stated a preference for face-to-face services especially for complex issues. Cutting access to face-to-face support during a Cost of Living Crisis where people are experiencing increased levels of anxiety, stress and mental health issues could have adverse impacts on a number of Section 75 groups including women.

We repeat that it is not only important to have sufficient Departmental staff available in relation to a complex benefits system. It is also vitally important that funding is also provided to community and voluntary sector partners to provide independent information and advice to people in the way that best suits their needs. Community and voluntary sector organisations, like advice centres and Women's Centres, provide trusted local spaces where people can get information, advice and support in a holistic way that supports their needs.

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<sup>55</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>56</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>57</sup> Mental Health Strategy 2021 – 2031, Consultation Draft, Department of Health, December 2020  
[doh-mhs-draft-2021-2031.pdf](http://doh-mhs-draft-2021-2031.pdf) ([health-ni.gov.uk](http://health-ni.gov.uk))

## **Social Security Benefit Delivery Laptop Replacement Programme**

The consultation document states that failure to progress replacement of older laptops will pose a considerable risk to social security operational benefit delivery including the ability to pay all customers. We again refer the Department to the issues highlighted above in relation to the potential for delays to benefit payments, financial hardship for claimants and increased debt stock and the likelihood for women to be more adversely affected by these outcomes.

### **ii. Discretionary Support (DS) Grants**

Discretionary Support provides support to people in crisis or emergency situations providing important financial help for essential living expenses. Those who use Discretionary Support frequently meet the definition of destitution – they are unable to afford basic necessities. It is for real and urgent need which if not met by Discretionary Support will need to be met elsewhere.

An independent Review into Discretionary Support<sup>58</sup> found that users of the Scheme described the money they got as being lifesaving and that they would not have been able to cope without this help. The Scheme therefore enabled access to basic necessities, like electricity and food, which highlights the extremely precarious financial position of Discretionary Support applicants.

The EQIA document states that the budget for Discretionary support will be “*scaled back to live within budget available for 2023-24.*” The current demand for Discretionary Support grants stands at almost £40m but the baseline budget is £13.7m. The Department also acknowledges the vital support that Discretionary Support provides particularly during a Cost of Living Crisis and that this support is provided to vulnerable people and households in financial hardship.

The proposed cuts to Discretionary Support are hugely concerning impacting on some of the most vulnerable in our society. It will impact on those on the lowest

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<sup>58</sup> Independent Review of Discretionary Support, Department for Communities, February 2022 <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-independent-review-of-discretionary-support-22.pdf>

incomes, those who can least afford it, who are already bearing the brunt of the Cost of Living Crisis. If they cannot access Discretionary Support where will they go? They are by definition living on a low income, many will have poor credit ratings leaving them no other option than to look at other forms of credit, often expensive credit or even dangerous forms of lending like paramilitaries. As a society we already have significant issues with problem debt and concerns over paramilitary lending and cutting the amount of crisis help available especially in a Cost of Living Crisis will certainly make these issues worse.

Providing access to Discretionary Support can help to divert people from expensive and dangerous forms of credit. The ability to access a loan from Discretionary Support is more affordable than going to a local money lender who charges interest and who if you are unable to repay might harm you, your property or exclude you from your community.

The Cost of Living Crisis has brought issues of low pay and insufficient benefit levels to the fore and highlights that in this current crisis many more people are unable to make ends meet living on a low income. Figures from the Trussell Trust in Northern Ireland provide cause for concern in terms of the population's ability to meet the cost of the most essential items including food. The latest end of year statistics for the Trussell Trust in Northern Ireland<sup>59</sup> show record levels of need with a 141% increase in the number of emergency food parcels given out in the last five years. This points to growing numbers of people in financial difficulty and in crisis situations needing access to the emergency support provided by Discretionary Support.

Research by the Women's Regional Consortium on Women Living with Debt<sup>60</sup> has shown that many women are struggling to afford the most basic of items including food and energy bills and even more so in the Cost of Living Crisis. Many do not

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<sup>59</sup> Emergency food parcel distribution in Northern Ireland: April 2022 – March 2023, Trussell Trust <https://www.trusselltrust.org/wp-content/uploads/sites/2/2023/04/EYS-Northern-Ireland-Factsheet-2022-23.pdf>

<sup>60</sup> Women Living with Debt, Women's Regional Consortium, September 2022 <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

have even small amounts of money to spare to deal with financial shocks such as a washing machine, fridge or cooker breaking down.

We suggest that because women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time work and more likely to have responsibility for managing the household budget and paying household/children's bills they are more likely to need to access Discretionary Support if they are unable to make ends meet. This is evidenced by statistics (Tables 1, 2 and 3 below) from the Department which were received in response to a Freedom of Information request by WSN on 5 June 2023.

These tables show increasing numbers of female claimants over the last number of years with statistics for the last year (2022/23) showing that women make up 60% of claimants where an award of Discretionary Support is made and around 58% of claimants where no award is made. This would mean a greater adverse impact on women if the cuts to Discretionary Support proposed in this EQIA go ahead.

**Table 1**

Gender	Gender by Financial Year, claim where award made					
	20/21		21/22		22/23	
Female	32402*	54.12%	46230	58.81%	61470	60.56%
Male	27468*	45.88%	32373	41.19%	40036	39.44%
Total	59870*		78603		101506	

**Table 2**

Gender	Gender by Financial Year, claim where nil award made					
	20/21		21/22		22/23	
Female	13922*	53.35%	20793	57.18%	22495	57.95%
Male	12175*	46.65%	15570	42.82%	16326	42.05%
Total	26097*		36363		38821	

**Table 3**

Gender	Gender by Financial Year, overall claims					
	20/21		21/22		22/23	
Female	46324*	53.89%	67023	58.30%	83965	59.84%
Male	39643*	46.11%	47943	41.70%	56362	40.16%
Total	85967*		114966		140327	

***\*The data provided for the 20/21 financial year includes only claims processed using Discretionary Support Computer System, clerical claims taken during this time in response to Covid-19 pandemic could not be included as gender information was not recorded.***

### **iii. Employment Support**

Government plans over the last number of years have focused on getting job-ready people off Universal Credit and into work. The success of these plans is dependent on a range of different supports to enable people to be able to make the move into work and to stay in work. Employment support is critical particularly for those who are the most marginalised and furthest removed from the world of work. We believe that this is a highly gendered issue and which needs more focus within this EQIA.

As we have already outlined in Section 2.5 Northern Ireland's economic inactivity figures make for concerning reading. Northern Ireland consistently has higher economic inactivity rates than other regions of the UK and has done so for well over a decade. In addition, the female economic inactivity figure is particularly high at 30.4% compared to 22% for men.<sup>61</sup>

An analysis of the detail around the female economic inactivity rate shows that around a quarter of women who were unavailable for work gave the reason for inactivity as family/home care (43,000 or 24%) and this was the least likely reason for male inactivity (at 9,000 or 7%).<sup>62</sup> This is an important consideration in terms of the ability of women to access education, training, childcare and employment support in order to help them move into and stay in work. Without targeted and long-term employment support in these important policy areas it will not be possible to address these high economic inactivity figures and enable women to avail of the opportunities provided through employment.

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<sup>61</sup> Ibid

<sup>62</sup> Labour Force Survey Tables – April 2023, Table 2.4a Economic inactivity by reason, aged 16 to 64, numbers and rates

[Labour Market Report – April 2023 | Northern Ireland Statistics and Research Agency \(nisra.gov.uk\)](https://www.nisra.gov.uk/labour-market-report-april-2023)

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As we have outlined in Section 2.2 women are more likely to be in receipt of social security benefits, more likely to be in part-time, insecure work, more likely to have caring responsibilities limiting their time available for work and more likely to have to make up for cuts in services through unpaid work. We stress that the provision of employment support is particularly important for women and therefore any cuts in these areas will have greater negative impacts for women.

While it is important that employment support is provided by the Department through the Labour Market Partnerships (LMPs) in each council area, we also wish to highlight that there is also an increasing need for long-term, sustainable investment for voluntary and community sector partners to help with this work. Trusted community based organisations, like Women's Centres, provide important employment support by addressing barriers to participation including childcare, often to the most marginalised and to women who are furthest from the workplace.

The Women's Regional Consortium believes that employment support must include access to training and education at community level supported by childcare. This is an important factor in enabling women in low income households to access the training and education they need to make the move into and stay in work. Women's Centres provide wraparound services to women so that they can get the education, training, childcare, information, advice and support they need in a way that is accessible to them and often in ways that the Department may not be able to deliver. This must also be an important consideration within this EQIA, helping as it does to deliver on a number of key priorities for the Department including gender equality, employment support, anti-poverty and child poverty work.

#### **vii. Supporting People Programme**

The EQIA outlines the important housing support services provided to 19,000 vulnerable people each year through the Supporting People programme. It also details the significant shortfalls in supply of housing support and lists as one of the groups particularly impacted women who are at risk of domestic violence. The EQIA states there is a service shortfall of 49% or approximately 650 units. Domestic abuse is a highly gendered crime as 68% of victims are female and 83% of offenders

are male.<sup>63</sup> This is extremely concerning and means greater adverse impacts for women.

Access to housing must be complaint with the Istanbul Convention. Article 20 of the Convention<sup>64</sup> states: *“Parties shall take the necessary legislative or other measures to ensure that victims have access to services facilitating their recovery from violence. These measures should include, when necessary, services such as legal and psychological counselling, financial assistance, housing, education, training and assistance in finding employment.”*

### **Social Housing**

The number of households in priority need of social housing in Northern Ireland is at the highest level on record. In March 2022 there were 44,426 applicants on the social housing waiting list and of these 34,407 were in ‘housing stress’.<sup>65</sup> This can have particularly negative impacts for women, LGBTQI+, BAME and disabled people leaving them unable to access suitable housing. In terms of gender, statistics show that more women are social housing tenants (23%) than men (12%).<sup>66</sup> Changes to social housing therefore have a disproportionate impact on women who are overrepresented among those in housing need and among social renters.<sup>67</sup>

Insufficient social housing stock can have serious implications in domestic violence situations leaving victims (68% of victims are female) trapped in coercive and abusive situations as they have nowhere to go. The ability of survivors of domestic abuse to rebuild their lives can be severely limited by a lack of suitable housing which is appropriate for their particular needs including the needs of disabled women

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<sup>63</sup> <https://www.health-ni.gov.uk/sites/default/files/consultations/health/doh-dsas-draft.PDF>

<sup>64</sup> Council of Europe Convention on preventing and combating violence against women and domestic violence, April 2011  
[Council of Europe Convention on preventing and combating violence against women and domestic violence \(coe.int\)](https://www.coe.int/t/t09/Convention/Convention_en.asp)

<sup>65</sup> Northern Ireland Housing Statistics 2021-22, NISRA & DfC, December 2022  
<https://www.communities-ni.gov.uk/system/files/publications/communities/ni-housing-stats-21-22-full-copy.pdf>

<sup>66</sup> NIHE House Condition Survey 2016  
<https://www.nihe.gov.uk/Working-With-Us/Research/House-Condition-Survey>

<sup>67</sup> Housing and gender, Briefing from the UK Women’s Budget Group on the impact of changes in housing policy since 2010 on women, November 2017  
[Microsoft Word - housing pre-budget nov 2017 final.docx \(wbgroup.org.uk\)](#)



and children. The situation is even worse in rural areas where there is even less social housing available in the locality and victims are reluctant to move their children from local social networks and schools. The social housing sector already understands how domestic abuse presents and the impact it has on victims the majority of whom are women. This model of housing provision is therefore important and any move away from this model of provision will be detrimental for victims and survivors of domestic abuse.

### **Affordable Warmth**

We are concerned that the EQIA suggests closing the Affordable Warmth Scheme to new applicants. The EQIA highlights that this could potentially impact vulnerable, low-income households most at risk of fuel poverty. This is extremely worrying particularly during a Cost of Living Crisis where people are really struggling with their energy bills. Research by the Women's Regional Consortium on the impact of the Cost of Living Crisis on Women (not yet published) shows that energy costs were one of the top bills having the biggest impact on their household budgets. When asked what would help them cope better with Cost of Living increases the top answer from the women was increased help with energy bills.

Research by National Energy Action (NEA) in Northern Ireland found that 75% of households in Northern Ireland had worries about paying for energy either currently or during the winter ahead.<sup>68</sup> Research by the University of York<sup>69</sup> found that 45% of Northern Ireland households were found to be in Fuel Poverty with Northern Ireland set to be worst affected part of the UK in terms of fuel poverty levels with 71.7% of families falling into fuel poverty by January 2023. This research also found that the households most likely to be fuel poor will be large families with children, lone-parent families and pensioner couples. It found that single parent households across the UK with two or more children will bear the brunt of fuel poverty at 88%. Research also shows that rural areas face specific challenges which can exacerbate their vulnerability to fuel poverty.<sup>70</sup>

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<sup>68</sup> <https://www.nea.org.uk/wp-content/uploads/2022/07/NEANI-LTJune22-MAINREPORT-PubNonQualitative-EXTERNAL.pdf>

<sup>69</sup> [Fuel poverty: updated estimates for the UK | CPAG](#)

<sup>70</sup> <https://www.handiheatproject.eu/>

It is therefore clear there are significant issues with fuel poverty in Northern Ireland and is impacting on the most vulnerable low-income households many of whom will be women. Single parents often struggle to afford energy costs and are at greater risk of fuel poverty (the majority of single parents are women). As we have already outlined women are at greater risk of poverty over their lifetimes, are more likely to be providing care, are more likely to claim social security benefits and to be in low-paid, part-time work which impacts on their ability to afford their energy bills. We again suggest that any cuts to help address fuel poverty including to the Affordable Warmth Scheme will have greater adverse impacts for women.

### **Private Sector Grants and Major Adaptations**

The EQIA outlines the possibility of a reduction in grant approvals for Disabled Facility and Repairs grants. The document states that this would have a disproportionate impact particularly on those with a disability and on low-income households. We have outlined throughout this response the range of circumstances which mean that women are more likely to live on low-incomes and poverty across their lifetimes.

Focus group research carried out by the Women's Regional Consortium highlighted a frequently raised concern was the issue of housing conditions. Many of the women reported that the quality of their existing housing (often private rented) was inadequate. They reported that poor housing conditions impacted greatly on their wellbeing, their mental and physical health, the health and wellbeing of their children and other family members and their sense of place and community.

We share the concerns raised by our colleagues in Housing Rights about the low standards and high levels of disrepair in the private rented sector and this was reflected in our focus group research with women. Available statistics from both the Northern Ireland Housing Executive (NIHE) and Housing Rights point to issues within the private rented sector. NIHE figures show that the private rented sector had a higher proportion of non-decent homes (10.7% or 14,300 properties)

compared to 3.1% of social housing properties.<sup>71</sup> Housing Rights figures show that between April 2020 and March 2021 they dealt with over 3,200 issues relating to housing conditions of which 71% came from the private rented sector compared to 23% in the social housing sector.

The experiences of private renters point to the impact which poor conditions in private rented sector properties can have on tenant's ability to manage their budgets effectively and to pay their rent.<sup>72</sup> Housing Rights advisers found that poor fuel efficiency and condition of properties in general had a major impact on their clients' ability to maintain their tenancies.<sup>73</sup> Advisers also found that clients who were able to access affordable properties found that months later inefficient heating and poor insulation meant they were spending excessive amounts of money heating their homes.<sup>74</sup> This is particularly concerning given the impacts of the Cost of Living Crisis.

It is clear that the issue of poor quality housing has implications for access to repairs but beyond this it also has impacts for household budgets and health and wellbeing. It is difficult to understand in the midst of a Cost of Living Crisis that help with repairs could be cut especially for the most vulnerable households.

## **Section 75 Categories Potentially Impacted**

The EQIA states that the actions being proposed by the Department as a result of budget constraints will have a *“dramatic impact on public services delivery.”* We agree with this statement and are extremely concerned about the impact this is likely to have particularly on the most vulnerable in our society.

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<sup>71</sup> House Condition Survey, Main Report 2016, NIHE  
<https://www.nihe.gov.uk/Documents/Research/HCS-2016-Main-Reports/HCS-Main-Report-2016.aspx>

<sup>72</sup> Preventing Homelessness and Sustaining Tenancies in the Private Rented Sector: Scoping Project, Dr Martina McAuley, Housing Rights, September 2020  
<https://www.housingrights.org.uk/sites/default/files/policydocs/Preventing%20Homelessness%20and%20Sustaining%20Tenancies%20in%20the%20PRS.pdf>

<sup>73</sup> Ibid

<sup>74</sup> Ibid

We want to raise a number of issues with the adverse impacts identified by the Department in relation to the categories of **Men and women generally** and **People with or without dependants**.

### **Men and women generally**

We are disappointed to note that in the adverse impacts identified by the Department mentions of impacts on women are balanced with an equivalent impact on men.

This suggests that the Department is taking a default gender-neutral approach. We have already detailed the difficulties and dangers with this approach in Section 2.1 and point the Department to the need to consider the gendered impacts of the actions proposed within the EQIA for women as outlined below.

The EQIA states: *“women may experience barriers to employment and economic participation whilst men may be subject to health problems leading to higher rates of morbidity and mortality associated with poverty. “Lack of funding to provide employment support is likely to adversely **impact on both men and women**.”*

**Women will experience greater adverse impacts due to a lack of funding to provide employment support because they are more likely to experience barriers to employment and are more likely to be economically inactive – see Sections 2.2, 2.5 and 2.6.**

While economic inactivity has been briefly mentioned within the consultation at no point does it address the gendered nature of this issue as we have outlined in Section 2.5. We point to the necessity of analysing the gendered nature of these figures. It is only by acknowledging and addressing these gendered issues that effective actions can be developed and implemented to make a real difference in this area. We again caution on taking a gender neutral approach to policy making in this regard as outlined in Section 2.1.

The EQIA states: *“Additionally, both men and women will be impacted by the constrained funding available to support **parity social security benefit delivery** and*

*Move to Universal Credit which will also impact on their households and dependents.”*

**Women are likely to experience greater adverse impacts due to constrained funding for social security benefit delivery because they are more likely to claim social security benefits, more likely to be in low-paid, part-time work, more likely to be economically inactive, more likely to have caring responsibilities and more likely to live in poverty across their lifetimes – see Sections 2.2, 2.5 and 2.6.**

The EQIA states: *“Men and women will also be impacted by lack of funding to take forward new **welfare mitigations.**”*

**Women will experience greater adverse impacts due to a lack of funding to take forward new welfare mitigations.**

We believe that a lack of funding for strengthening the mitigations package will disproportionately impact on women and that this should have been identified within this EQIA – see Section 2.3. There are a number of reasons for this namely that women are more likely to claim social security benefits, are more likely to have caring responsibilities and have been much more adversely impacted by welfare reform – see Section 2.2. The impact of this is made more difficult to quantify due to a lack of statistics broken down by gender particularly in relation to Universal Credit. Latest figures available show 37% of Universal Credit claimants were lone parents (the majority of lone parents are women).<sup>75</sup> Equality statistics on the mitigation payments themselves show that these were paid to more women than men.<sup>76</sup>

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<sup>75</sup> Northern Ireland Benefits Statistics Summary, DfC & NISRA, November 2022  
<https://www.communities-ni.gov.uk/system/files/publications/communities/benefit-statistics-summary-nov-2022.pdf>

<sup>76</sup> Northern Ireland Welfare Supplementary Payment Schemes, Section 75 statistics November 2017 to April 2019, DfC  
<https://www.communities-ni.gov.uk/publications/welfare-supplementary-payments-discretionary-support-standards-advice-assistance-and-sanctions>

The independent Welfare Mitigations Review Report<sup>77</sup> has recommended a number of new mitigations for Northern Ireland including offsetting the two-child policy and providing help during the Universal Credit five-week wait. The report's recommendations would help low-income households including carers, adults and children with disabilities alongside benefitting women in particular. The impacts of not strengthening the mitigations package will have adverse impacts across a number of Section 75 groups – women, people with a disability and people with dependants.

As members of the Cliff Edge Coalition we are also concerned about the lack of budget to strengthen the welfare mitigations package which we believe is so important in protecting low-income households. The harsh impacts of new welfare challenges, as well as the ongoing Cost of Living Crisis are increasingly affecting these households throughout Northern Ireland. This has prompted Cliff Edge to restate their three key asks around the strengthening of the mitigations package:

- **Resolve the five-week wait for Universal Credit** – as we have previously outlined research by the Women's Regional Consortium<sup>78</sup> has shown the very negative impacts of the five-week wait on women. Women are more likely to claim social security benefits, more likely to be in low-paid, part-time work, more likely to be economically inactive, more likely to have caring responsibilities and more likely to live in poverty across their lifetimes. Universal Credit statistics also show that 37% of claimants were lone parents and most lone parents are women.
- **Mitigate the two-child limit** – the two-child limit is a highly gendered policy impacting particularly on women. Women are more likely to provide care for children and economic inactivity figures show that many more women cite family/home care as the main reason for economic inactivity compared to men leaving them more reliant on social security – see Section 2.5. In addition, most lone parents are women. This policy also has a larger impact in

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<sup>77</sup> [Welfare Mitigations Review \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/welfare-mitigations-review)

<sup>78</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>

Northern Ireland where families are larger. Typically, the average family size is larger in Northern Ireland with 21.4% of families having three or more children compared to 14.7% in the UK.<sup>79</sup>

- **Provide support for private renters affected by the Local Housing Allowance (LHA)** - with LHA rates frozen since April 2021 and average rents rising by 8.4% in the past year, many private renters face a significant shortfall between their rent and the amount of LHA they receive, as well as a lack of affordable properties. The affordability issues are highlighted by statistics showing that in 2021 approximately 50,400 households are paying 25% or more of their income in the private rental sector.<sup>80</sup> Single parents (93% of whom are women) are disproportionately impacted by cuts to the LHA rate. In 2019/20, 36% of single parent households were living in the private rented sector (compared to 23% in 2003).<sup>81</sup> Single parent households are more likely to be impacted by poverty and are therefore more likely to be in need of support to pay for their housing costs.<sup>82</sup>

The EQIA does not detail the likely adverse impacts of proposed cuts to Discretionary Support for women. As previously outlined we believe that because women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time work and more likely to have responsibility for managing the household budget and paying household/children's bills they are more likely to need to access Discretionary Support if they are unable to pay their bills. As we have previously outlined (see Tables 1, 2 and 3) statistics from the Department show that women are more likely to claim Discretionary Support and therefore would experience a greater adverse impact if the cuts to Discretionary Support proposed in this EQIA go ahead.

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<sup>79</sup> Member Briefing, Cliff Edge Coalition, May 2023

<https://www.lawcentreni.org/wp-content/uploads/2023/04/CEC-Full-Member-Briefing-May-2023-.pdf>

<sup>80</sup> Ibid

<sup>81</sup> [Family Resources Survey report 2019 - 2020 | Department for Communities \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/family-resources-survey-report-2019-2020)

<sup>82</sup> [Official Sensitive- Prior to publication at 09:30 on 3rd September 2020 \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/official-sensitive-prior-to-publication-at-0930-on-3rd-september-2020)

### **People with or without dependants**

Firstly, the fact that the Department does not collect information on dependents shows a significant data gap in terms of identifying the impact on this Section 75 group. It is likely that this group will be largely women given that the majority of lone parent households are women.

The EQIA rightly acknowledges that childcare can act as a barrier to moving towards employment or obtaining, retaining or progressing within employment, particularly for women, lone parents and those from disadvantaged backgrounds.

Childcare is a huge issue for women's economic participation and the cost and availability of childcare is a significant issue in Northern Ireland – see Section 2.6. The provision of flexible, affordable childcare is central to tackling women's disadvantage and gender inequality.

We raised the issue of integrated childcare and community education in Section 2.7 and highlighted the value of the Women's Centre Childcare Fund which is so vital to women from disadvantaged backgrounds and lone parents. 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.

At no point does the EQIA identify that children are more likely to be impacted by potential cuts to social security provision as they are more likely to live in poverty – see Section 2.2.

### **3. Please state what action you think could be taken to reduce or eliminate any adverse impacts in allocation of the Department's budget.**

We are hugely concerned about the adverse impacts of the contents of this EQIA. Given that the Department has responsibility for anti-poverty and gender equality issues as well as social security and employment support it is vital that it has the



necessary budget to work on these important issues. The wider environment that we are currently experiencing including the ongoing impacts of the pandemic, welfare reform, long-term gender inequalities and the Cost of Living Crisis means that the services provided by the Department have never been more important or necessary. It is difficult therefore to provide suggestions for action that could be taken to reduce or eliminate any adverse impacts resulting from this EQIA as we believe that more expenditure is needed in many of these areas and not less.

We desperately need a budget allocation that will allow Northern Ireland to address some of the key systemic issues that are holding us back such as investing in anti-poverty measures, childcare and measures to tackle inequalities including gender.

We believe that it makes economic sense to invest in the social security system. Reducing support to those on the lowest incomes through the benefits system especially during a Cost of Living Crisis reduces the amount of money that people have to spend in local economies reducing demand at a time when action is needed to create jobs and revive businesses. Professionals working in the advice sector have long advocated the principles of the 'multiplier effect'. This argues that there are economic advantages to high levels of benefit take-up as claimants spend money on goods and services in the local community. Ambrose and Stone (2003) found that a multiplier effect of 1.7 exists, meaning each pound raised in benefit entitlements for claimants should be multiplied by 1.7 to give a much greater overall financial benefit to the economy.<sup>83</sup>

We suggest that given the current Cost of Living Crisis, no local Government and a very challenging budgetary situation that the migration of claimants to Universal Credit in Northern Ireland should be delayed. This would relieve the pressure on staff within the Department and on the community and voluntary sector who provide important supports to people going through this process. We have

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<sup>83</sup> Four reasons why welfare reform is a delusion, London School of Economics Blog, June 2017 <https://blogs.lse.ac.uk/politicsandpolicy/four-reasons-why-welfare-reform-is-a-delusion/>

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already outlined the considerable negative impacts of the Move to UC without adequate resourcing in our answer to Question 2.

We refer the Department to the work of the Children's Law Centre in Northern Ireland who recently attended and observed the UN Committee on the Rights of the Child examination of the UK government. They presented to the Committee briefing materials about the NIO's budget for Northern Ireland. The Committee's conclusions and recommendations have very recently been published<sup>84</sup> and they include a specific call to withdraw the budget for Northern Ireland such is the concern about the cumulative impact of the cuts and the likely harms to children and young people if they do take place.

## **Concluding Observation:** 11 (d)

**Withdraw the 2023/24 budget for Northern Ireland** and fully consider the equality and human rights implications of a new budget, taking all possible steps to **mitigate any adverse impact on children's rights** before issuing a revised budget



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<sup>84</sup>

[tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGBR%2FCO%2F6-7&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGBR%2FCO%2F6-7&Lang=en)

**4. Are there any other comments you would like to make in regard to this pro forma or the consultation process generally?**

*Timescale to respond*

This consultation was issued on 10 May 2023 with interested parties encouraged to respond by 7 June 2023 to inform the Department's allocation of funds. This leaves just four weeks to respond to what is a hugely important document with very concerning impacts for the women, families and communities we represent. This EQIA was published alongside a number of other EQIA's from other Departments which also require responses by the community and voluntary sector. This has put huge pressure on an already overstretched and under-resourced community and voluntary sector who are facing significant challenges as a result of the Cost of Living Crisis. While the consultation does state a final closing date of 2 August in reality organisations need to respond by 7 June in order to have any influence over the allocation of funds so therefore this is the de facto date.

This was an incredibly short deadline for an issue of such importance and such a short deadline goes against all existing good practice on consultations: *"When government consults it must build a realistic timeframe for the consultation, allowing plenty of time for each stage of the process."*<sup>85</sup> We suggest that given the nature and importance of this consultation and the impact of the Cost of Living Crisis that the deadline should have been longer to enable genuine and meaningful consultation.

We refer the Department to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.<sup>86</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

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<sup>85</sup> nidirect <https://www.nidirect.gov.uk/articles/public-consultations>

<sup>86</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)

relevant, listening to the stories from women and making women visible in the product as well as the process.

### *Rural Needs Assessment*

We are disappointed that the consultation did not include a Rural Needs Assessment. Research by NIRWN shows that rural women are under increasing pressure from the economic climate leaving them experiencing more poverty and social isolation than ever before.<sup>87</sup> Rural women are particularly vulnerable to access poverty meaning that they are unable to address their financial poverty if they lack access to affordable childcare and transport to allow them to access better paid, better quality jobs.

A Rural Needs Assessment is supposed to be carried out at the early stages of policy development including in the development of draft budgets. The Women's Regional Consortium would have liked to have seen a Rural Needs Assessment carried out particularly given the fact that Northern Ireland has a significant rural population with 36% of the population living in rural areas.<sup>88</sup>

### *Importance of the Community and Voluntary Sector*

We have attempted to highlight in Section 2.7 of this response just how crucial the work of community organisations, such as Women's Centres and the wider women's sector, are to the women, children, families and communities we represent. These community and voluntary organisations are able to reach some of the most vulnerable and marginalised in our communities who are likely to be the most adversely affected by these proposed budget cuts.

The community and voluntary sector proved to be essential during the Covid19 pandemic. Former Communities Minister Carál Ní Chuilín praised the work of the voluntary and community sector during the pandemic and said: "*As we transition*

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<sup>87</sup> Rural Women's Manifesto, NIRWN, September 2015

<https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf>

<sup>88</sup> Mid-Year Population Estimates – Urban/Rural Change, NISRA

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

*from the lock-down period I want to reflect on how grateful I am to the voluntary and community sector for their incredible efforts in supporting communities and individuals through the pandemic. Right across the sector, we have seen voluntary and community based organisations mobilise their own support activities at pace, while feeding into and supporting Government led responses.”*<sup>89</sup> There is no doubt that the Department relied on the community and voluntary sector infrastructure and their vital local connections to people to help respond to the pandemic.

The same is now happening with the Cost of Living Crisis. Community and voluntary sector organisations have once again been called on to ‘stand in the gap’ to provide support and services to some of the most vulnerable and marginalised people in our communities who are now being so negatively impacted by the Cost of Living Crisis. The Department relies on the sector to reach into local communities and to access people ‘on the ground’ in ways they are not able to.

The Department has outlined in the EQIA the *“inescapable pressures”* they face but this is also the same for the Community and Voluntary Sector in terms of the impacts of the Cost of Living Crisis. Cost of Living impacts are not unique to Government departments and Community and Voluntary organisations experience the same issues without any increases in funding to cope with the increased costs they face.

In her engagement with groups from across the Voluntary and Community sector, Communities Minister Deirdre Hargey said she was hearing *“about the challenges they are faced with as a result of the on-going cost of living crisis and the negative impact this is having on the groups and communities they serve.”* She stated that she wanted to assure these groups that *“I am listening to the concerns raised and I am committed to doing everything I can to support the delivery of vital services to those in need.”*<sup>90</sup> The Minister has stated that the: *“Voluntary and Community sector is critical. The Voluntary and Community*

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<sup>89</sup> <https://www.northernireland.gov.uk/news/voluntary-and-community-organisations-praised-covid-19-response>

<sup>90</sup> <https://www.communities-ni.gov.uk/news/hargey-continues-engagement-voluntary-and-community-sector-cost-living-crisis-continues>

*Sector organisations have served their communities with professionalism and have shown both innovation and a readiness to adapt services to meet the new challenges that have arisen.”<sup>91</sup>*

Despite the vital role of the Community and Voluntary Sector we are being put in the unconscionable position of having to respond to these proposed cuts in services for the people and communities we represent. It is our job to advocate on their behalf to ensure that they are protected from any adverse impacts. However, this is essentially putting Community and Voluntary sector organisations in direct competition with the beneficiaries of these services. If cuts have to be made (and we provide evidenced arguments why the cuts proposed in the EQIA should not be made to protect the people we represent) then will the Department look to make these cuts in the Community and Voluntary Sector? DfC have already effectively made a 2% cut to the sector as funding for April to June 2023 has been frozen at the 2022/23 rate, with the planned 2% salary increase for April 2023 withdrawn. This is an unfair position to put the sector in when it is clear just how vital and irreplaceable its work is as has been highlighted by previous Communities Ministers.

#### *Cumulative Impact of the Proposed Cuts and Intersectionality*

There has been no analysis of the cumulative impacts of the proposed cuts, across Government departments. For example, cuts to Discretionary Support may mean that people can't afford to buy the food or heat they need which may cause them to become physically or mentally ill which could impact on the health service and cuts to Supporting People may have implications for women escaping domestic violence situations if they are unable to access the accommodation they need which has implications for the forthcoming Violence Against Women and Girls Strategy. Taking a silo approach to these cuts by individual Departments is further contributing to the problem.

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<sup>91</sup> <https://www.communities-ni.gov.uk/news/hargey-announces-increased-wages-and-protections-workers-voluntary-and-community-sector>



Intersectionality recognises that people can experience discrimination on the basis of multiple and intersecting identities. As highlighted by the Gender Equality Strategy Expert Panel<sup>92</sup> report *“Disadvantage and discrimination based on gender is inextricably linked to other identities, factors and experiences such as age, race, disability, sexual identity and poverty. Utilising the concept of intersectionality provides the opportunity to recognise, and address through policy, multiple, intersecting disadvantages.”* This is an important consideration within this EQIA yet it contains no intersectional analysis.

No account has been taken of how all the proposed cuts (both cuts within a single Department and across Departments) will have multiple impacts on the Section 75 groups. For example, cuts to Discretionary Support (proposed by DfC) may impact on a low-income woman, who could also be impacted by delays to her UC payments because of inadequate staffing within UC (proposed by DfC) as women are more likely to claim benefits. She may also be more likely to be impacted by reduced street lighting (proposed by the Department of Infrastructure (DfI)) and the reduced availability of community transport services (proposed by DfI) if she lives in a rural area and because women use these services more than men. She may also suffer negative impacts due to a lack of funding for the Violence Against Women and Girls Strategy (proposed by The Executive Office) as women are more likely to be victims than men. There is a real need for oversight across the Departments on the cumulative impacts as well as a need for oversight around any potential mitigations.

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<sup>92</sup> Gender Equality Strategy, Expert Advisory Panel Report, December 2020  
[Gender Equality Strategy \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/gender-equality-strategy)

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