



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

### **Response to: Changes to the Discretionary Support Scheme EQIA**

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**Prepared by: Siobhán Harding  
Women's Support Network  
Email: [policy@wsn.org.uk](mailto:policy@wsn.org.uk)**



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) Changes to the Discretionary Support Scheme Equality Impact Assessment (EQIA). The main functions of the Department include: *"a social welfare system including focused support to the most disadvantaged areas", "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."* We believe that the reduction in funding outlined in this EQIA, compared to expenditure in the previous year, results in a significant challenge to the ability of the Department to fulfil these functions.

**1.5** 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 remain extremely concerned about the cuts outlined in this consultation document which target those who are the most vulnerable including those on the lowest incomes many of whom will be women.

**1.6 We wish to endorse the responses made by the Women’s Policy Group (WPG), the Northern Ireland Women’s Budget Group (NIWBG) both of which groups the Women’s Regional Consortium is represented on and the response made by Ulster University colleagues Dr Ciara Fitzpatrick, Professor Gráinne McKeever and Dr Mark Simpson. 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>2</sup>. We

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<sup>2</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/>

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 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 place at the very end of the budget planning process or after the budget has been finalised. The OECD<sup>3</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

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<sup>3</sup> OECD (2023), OECD Best Practices for Gender Budgeting, *OECD Journal on Budgeting*, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

budgetary process through gender analysis of data supported by experts from civil society.

## 2.0 General Comments

The consultation document states that the Department is “*facing a very constrained financial position in 2023-24, with £111.2m of a non-ring-fenced funding gap*”. 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 especially for those on the lowest incomes.

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.

The Independent Review into Discretionary Support<sup>4</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 2022-23 Discretionary Support grants baseline budget was £13.7m. With additional funding allocated to the Department in November 2022, to support the increased level of demand, the final grant spend in 2022-23 was £40.3m.*” It then goes on to say that “*The Department’s financial position following the announcement of the 2023- 24 Budget will not allow for this level of spending to continue.*” The EQIA then states: “*In terms of Discretionary Support grants, the baseline budget has been increased by 46% to £20m in 2023-*

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<sup>4</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>

24.” This essentially means the Fund will be cut in half from last year in the midst of a Cost-of-Living Crisis.

These proposed cuts to Discretionary Support will impact the most on the poorest communities in Northern Ireland and on the Section 75 groups within those communities even more. These cuts are likely to have long-term consequences for their health and wellbeing and put pressure on already stretched services including the Health Service. We believe that cuts to Discretionary Support will particularly impact on women for all of the reasons outlined below.

## **2.1 Gender Inequality**

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

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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\\_3733\\_E.pdf](https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1_Global/INT_CEDAW_GEC_3733_E.pdf)

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.

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.

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,

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<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>

<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/>



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.

## **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 women)<sup>10</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>11</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>12</sup> This is likely to be further worsened by the Cost-of-Living Crisis.

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

***“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

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<sup>10</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>11</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>12</sup> A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women’s Budget Group, February 2019  
<https://fabians.org.uk/a-female-face/>

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 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>13</sup> These welfare reform and austerity measures have tended to limit the ability of the system to protect against poverty.<sup>14</sup>

Locally, an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)<sup>15</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>16</sup> and on the impact of Universal Credit<sup>17</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.

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<sup>13</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>14</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>15</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>16</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>17</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>

***“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)*

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>18</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>19</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>20</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)*

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<sup>18</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>19</sup> Ibid, para 18

<sup>20</sup> Shadow report for the examination of the UK by the Committee on the Convention to Eliminate Discrimination against Women, NIWEP, January 2019

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 Poverty Coalition<sup>21</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 Women and Debt**

Women's Regional Consortium research on Women Living with Debt<sup>22</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 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.

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 women will be more likely to feel the impact of funding reductions to

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<sup>21</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>22</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>

Discretionary Support. 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>23</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

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<sup>23</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>

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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>24</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>25</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).

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 reduce the levels of grant support through Discretionary Support. Reducing access to this important source of crisis help for those on the lowest incomes will only serve to drive the most vulnerable households to expensive and sometimes dangerous forms of lending. We suggest that particularly during a Cost of Living Crisis where budgets are so stretched that more investment is needed in this Scheme and not less.

## **2.4 Women and the Cost-of-Living Crisis**

Research by the Women's Regional Consortium on the impact of the Cost-of-Living Crisis on Women<sup>26</sup> has shown that many women are struggling to afford the most

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<sup>24</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>25</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/Policy-Report-Final-For-Web.pdf)

<sup>26</sup> Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium, June 2023

<https://www.womensregionalconsortiumni.org.uk/research/>

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basic of items including food and energy bills during this Cost-of-Living Crisis. The research clearly shows the disproportionate harm that the Cost-of-Living Crisis is having on women and children. Women shared their experiences of not being able to buy basic foods including baby formula and healthy food, particularly fresh fruit and vegetables, having to use foodbanks, eating out-of-date food and going without meals altogether.

Many of the women also reported suffering from poor mental and physical health as they strive to protect their children from the significant toll that the economic crisis is having on their lives through missing meals, living in cold homes and getting deeper and deeper into debt. Women are having to make torturous decisions around feeding themselves and their families and heating their homes. Often they are faced with no other choice but to go without themselves to make ends meet and the stark reality is that they are unable to live dignified, healthy lives.

***“We’re not living, we’re just existing.”***

***“My wee one is on Aptamil formula it’s £16 a tin now. I was going without food to make sure she had it. I was eating dry cereal just so she could get the formula she needed. The stress of getting down to the bottom of her milk tin and thinking will I have enough to get her her milk.”***

***“Heat, electricity and food the things you need to survive are literally like luxuries now. You’re having to make decisions if my child wants to eat and be warm what am I going to have to do without?”***

***“They keep saying inflation is 9% or 10% but the real Cost of Living for me is more like 40% since last year. The Government don’t know this – for them it’s just a fraction of their salary – they don’t understand. The people who are making the decisions are affected less by all this. They don’t know about families like me who are stuck in this Crisis – on Universal Credit.”***

***“I’m having to borrow for the way I normally live. I used to have a certain amount of money to cover my ordinary bills but that’s not there. So I’ll have another week until I get paid so I’ll use my credit card to get whatever I need. It’s all essential stuff, it’s just living.”***

*(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)*

Due to the fact that 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 household budgets and paying household/children's bills they are more likely to need to access Discretionary Support if they are unable to make ends meet.

The research found that many women are at crisis point. A decade of welfare reform policies and the Covid-19 pandemic have hit women harder and now the Cost-of-Living Crisis has created a perfect storm for women. In addition, Northern Ireland is facing an environment of severe budget cuts, a chronic lack of funding for essential services including health, social care, childcare and education which too often means women are forced to make up for cuts to these services through unpaid work and there has been no devolved Government since 2022.

The cumulative result of all these factors as well as the fact that 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 household budgets and paying household/children's bills means that women are more likely to need to access Discretionary Support if they are unable to make ends meet.



### 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 3 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>27</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 believe the Department should have referenced some additional sources of information/data in this section including:

- The Independent Review of Discretionary Support<sup>28</sup> commissioned by the then Minister for Communities, Deirdre Hargey, to make improvements to the system. The Review 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 cuts outlined in this EQIA undermine the important work/recommendations of this Review.
- Data contained in research papers published by the Women’s Regional Consortium on ‘Women Living with Debt’ (September 2022) and ‘Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland’ (June 2023)<sup>29</sup> which show the gendered nature of these issues and therefore the importance of Discretionary Support to women.

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<sup>27</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>28</sup> The Independent Review of Discretionary Support, February 2022  
<https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-independent-review-of-discretionary-support-22.pdf>

<sup>29</sup> <https://www.womensregionalconsortiumni.org.uk/research/>

- Data contained in the Advice NI report ‘The Move to Universal Credit: Get Ready’<sup>30</sup> which 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 suggest more people may find themselves in crisis and needing to access Discretionary Support and point to the need for increased support not less. 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>31</sup> We acknowledge that the EQIA states that the Universal Credit Contingency Fund will remain unaffected. However, Women’s Regional Consortium research<sup>32</sup> showed that 86% of the women who took part in the research had not heard about the Universal Credit Contingency Fund and may therefore be more likely to rely on access to Discretionary Support.

**2. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in section 4 of the EQIA Consultation document? If so, what are they?**

We welcome the fact that section 4 of the EQIA consultation document has acknowledged *“the changes to the Discretionary Support scheme will have a significantly greater impact on females than males.”*

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<sup>30</sup> The Move to Universal Credit: Get Ready, Advice NI, May 2023

<https://www.adviceni.net/policy/publications/move-universal-credit-get-ready>

<sup>31</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>32</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>

As we have highlighted in Section 2.2 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 household budgets and paying household/children's bills as well as being more likely to be in debt, they are more likely to need to access Discretionary Support if they are unable to make ends meet. This is evidenced by the statistics outlined in the EQIA document which show that 67% of those in receipt of Discretionary Support Grants are women.

We also have concerns about the likely adverse impacts of these proposals on lone parents (93% of lone parents are women). The EQIA outlines that 68% of those who were awarded a grant were single but goes on to say *"there is no indication if these claimants have dependants who could also be indirectly impacted by the changes to the Discretionary Support scheme."* The EQIA document also states that 29% of respondents had care for children but again does not provide any further analysis on gender or marital status within this group. This once again illustrates the importance of robust, disaggregated data in determining intersectional impacts across Section 75 groups.

As we have already outlined in Section 2.2 women and especially lone parents have been disproportionately impacted by welfare reform and austerity changes over the last decade. A local analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)<sup>33</sup> showed that across most income levels the overall cash impact of the reforms is more negative for women than for men and is particularly the case for lone parents who lose £2,250 on average, equivalent to almost 10% of their net income.

Women's Regional Consortium research on the impact of the Cost-of-Living Crisis on women in Northern Ireland (see Section 2.4) also found significant impacts of rising prices for essentials on lone parents (who constituted 43% of respondents). This research showed that lone parent families are often the most

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<sup>33</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)

exposed to the Cost-of-Living Crisis. Lone parents often have no one to share their costs with making it more difficult for them to maintain their living standards in the face of rising prices. Lone parents have fewer savings<sup>34</sup> to fall back on to cope with unexpected financial shocks leaving many vulnerable to financial hardship, poverty and debt.

We also wish to raise the cumulative impact of spending cuts within and across Departments on women and lone parents. We raise the following examples:

- **Within Departments – A lack of funding to take forwards new welfare mitigations** – one of the main recommendations from the Welfare Mitigations Review<sup>35</sup> was to include measures to offset the impact of the two-child limit with lone parents disproportionately impacted by the policy. An inability to introduce new welfare mitigations is likely to have significant impacts for women and particularly for lone parents who have been so impacted by welfare reform.
- **Across Departments - The end of the Holiday Hunger Payments Scheme (Department of Education)** - eligibility rules mean it is more likely that children living in single-earner households will be entitled to this help and therefore the loss of this Scheme will impact more on lone-parent households.

Given these statistics it is clear that there will be a greater adverse impact on women and lone parents if the cuts to Discretionary Support proposed in this EQIA go ahead. We want to see the Department measure the impact of the changes already being implemented (as of 3 July 2023) on lone parents given how impacted they have been by welfare reform, austerity and the Cost-of-Living Crisis.

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<sup>34</sup> <https://www.theguardian.com/business/2022/apr/30/single-parent-families-most-exposed-to-cost-of-living-crisis-in-great-britain>

<sup>35</sup> <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf>

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

The proposed cuts to Discretionary Support are hugely concerning impacting on those on the lowest incomes who can least afford it, who are already bearing the brunt of the Cost-of-Living Crisis. If they cannot access a Discretionary Support grant 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 getting into debt, often through expensive 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.

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>36</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.

Sections 2.3 and 2.4 of this response detail findings from Women's Regional Consortium research on Women Living with Debt and Women's Experiences of the Cost-of-Living Crisis. This research has shown that many women are struggling to afford the most basic of items including food and energy bills. Many do not have even small amounts of money to spare to deal with financial shocks such as a washing machine, fridge or cooker breaking down. These are exactly

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<sup>36</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>

the situations where the Discretionary Support Scheme is so needed. Figures for last year show increasing levels of demand for this help “*the 2022-23 Discretionary Support grants baseline budget was £13.7m. With additional funding allocated to the Department in November 2022, to support the increased level of demand, the final grant spend in 2022-23 was £40.3m.*”

Given the increasing demand for Discretionary Support and the impact of the Cost-of-Living Crisis we are hugely concerned about the adverse impacts of the contents of this EQIA on women, lone parents, children and people with disabilities. 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 increased investment is needed in Discretionary Support and not less.

Approximately half of the Discretionary Support budget (£10m) has already been spent in Quarter One of this year, leaving the remaining £10m to cover nine months including the Christmas and winter period.<sup>37</sup> This is the time when many of those on the lowest incomes will really need access to his help especially during a Cost-of-Living Crisis where energy bills and the cost of food remains high.

We therefore understand why the Department has chosen not to go with Option 1 and do nothing which would mean that the budget would be exhausted by the Autumn, leaving people with no access to support during the months when it is potentially needed the most. Option 2 to restrict awards to basic needs and extend the repeat item exclusion period allows for the budget to be extended over the difficult Winter months. The Department acknowledges that “*Option 2 does not represent an ideal solution*” and we agree with this assessment. As we have already outlined many times during this response cutting support to the most vulnerable during a Cost-of-Living Crisis is extremely detrimental and will cause long-term impacts on health, wellbeing, problem debt and poverty.

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<sup>37</sup> <https://twitter.com/KevinHiggins27/status/1684486915913809922?s=20>

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We are pleased to see that the Department *“will maintain exceptions for those in a disaster situation such as a flood or fire and for those ‘setting up’ home from a situation such as leaving care, custody or domestic violence.”*

However, given the greater adverse impacts on women identified in the EQIA document (67% of grants made to women) the EQIA contains no specific measures to explicitly address the gendered impacts of these proposals. In order to effectively address the adverse impacts resulting from these proposals there would need to be greater targeting of the existing budget to the groups most impacted by the reduction in funding.

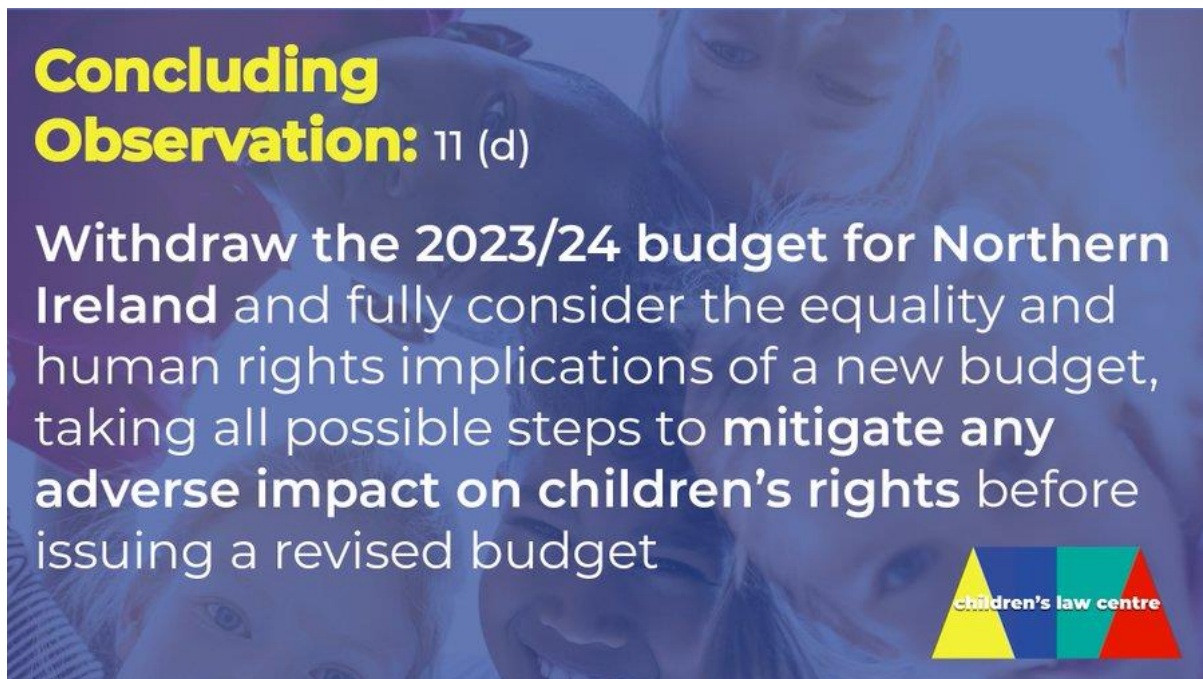
We also agree with our colleagues in Ulster University on a number of points around potential actions that could reduce/eliminate any adverse impacts:

- The Department *“should make a public commitment that current restrictions are temporary. If additional money becomes available in upcoming monitoring rounds the restrictions should be reviewed immediately with a view to reversing them.”*
- Further increase the debt threshold for Discretionary Support loans to those who may have a higher debt tolerance *“providing controlled access to more regulated, interest free credit will further protect families from resorting to more dangerous forms of lending, like pay-day loans, loan sharks/paramilitary lenders.”*
- Research by the Women’s Regional Consortium and Ulster University (see Section 2.4) showed that the Healthy Start Scheme has the lowest uptake in Northern Ireland at just 55% providing important help during pregnancy and in a child’s younger years to buy milk, fruit and vegetables. While the promotion of this Scheme falls under the Department of Health (DoH) *“it is suggested that DfC work in partnership with DoH to promote uptake more widely.”*

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>38</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.



**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*

Interested parties are encouraged to make responses by 11 August 2023, which will be used to inform a planned review of the decisions taken on the delivery of Discretionary Support by the Department. This leaves just over five weeks (including a holiday period) to respond to this consultation. This EQIA was published alongside a number of other EQIA's from other Government departments in relation to the Budget which also require responses from the

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[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)



community and voluntary sector. This puts significant 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 final date for responses is 25 September 2023 in reality interested parties need to respond by the earlier date in order to influence the review of decisions and so therefore this is the de facto date for responses. This 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>39</sup> We suggest 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>40</sup> This guidance contains five top tips based on the many years of experience that women’s groups have in promoting women’s participation in public policy making. These include the need to work together with the women’s community and voluntary sector, making time for accessible face to face engagement, keeping language accessible and relevant, listening to the stories from women and making women visible in the product as well as the process.

#### *Discretionary Support Independent Review*

An independent panel of experts was appointed by Communities Minister Deirdre Hargey in 2021 to complete a comprehensive review of the Discretionary Support Scheme. The Review was published in March 2022 but due to the collapse of devolved Government in Northern Ireland nothing has been done to take forward the important recommendations in this Review. In publishing the Review, Professor Gráinne McKeever from Ulster University, Chair of the independent review panel said *“The insights we gathered from scheme claimants, together*

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<sup>39</sup> nidirect <https://www.nidirect.gov.uk/articles/public-consultations>

<sup>40</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)

*with the perspectives shared with us by community, advice and voluntary sector organisations, reinforce that Discretionary Support is critically important and should be protected. It can help to take people out of destitute circumstances, and this will come into even sharper focus as the cost-of-living increases continue to escalate.”*

We believe that the proposals outlined in this EQIA undermine the important work of the independent Review Panel who along with the Minister were motivated to make improvements to this important Scheme. We believe it is unacceptable in light of this important work to reduce funding to Discretionary Support and we would like to see the recommendations from the independent review implemented.

#### *Rural Needs Assessment*

The EQIA document refers to the fact that the Department conducted a Rural Needs Impact Assessment but the detail of the assessment is not provided. It is important to have access to the Rural Needs Assessment to understand how the Department “*determined there will be no difference in the impact on people living in rural areas.*” We do not agree with the Department’s assertion that the proposals in the EQIA will impact rural and urban equally. 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>41</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.

#### *International Mechanisms*

We have already mentioned Government’s obligations under CEDAW (see Section 2.2). In its last report the Committee raised concerns about the “*disproportionately negative impact of austerity measures on women, who*

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<sup>41</sup> Rural Women’s Manifesto, NIRWN, September 2015  
<https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf>

*constitute the vast majority of single parents and are more likely to be engaged in informal, temporary or precarious forms of employment.” 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>42</sup>*

We agree with our colleagues in Ulster University<sup>43</sup> that cuts to the Discretionary Support budget pose a risk to rights under the European Convention on Human Rights (ECHR) namely Article 3 (the right to protection from inhuman and degrading treatment) and Article 8 (the right to family life).

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

There has been no analysis of the cumulative impacts of the proposed cuts within and across Government departments. Multiple cuts across Departments will have an impact often on the same Section 75 groups causing multiple layers of harm. However, there is no acknowledgement of this across the EQIAs. 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). She may also be more likely to be impacted by the cut to the Holiday Hunger Scheme (through the Department of Education) if she has children and the reduced availability of community transport services (proposed by DfI) if she lives in a rural area. 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.

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>44</sup> report *“Disadvantage and discrimination based on*

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<sup>42</sup> Ibid, para 18

<sup>43</sup> Legal Protection Against Destitution in the UK: the Case for a Right to Subsistence Minimum, M Simpson, G McKeever & C Fitzpatrick, *Modern Law Review* 465, November 2022  
<https://onlinelibrary.wiley.com/doi/full/10.1111/1468-2230.12773>

<sup>44</sup> Gender Equality Strategy, Expert Advisory Panel Report, December 2020

*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.