



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

## Response to: Budget 2024-25 Equality Impact Assessment

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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)

**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

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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

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 2024-25 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 impacted more on women, the worsening of existing inequalities as a result of the Coronavirus 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.

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<sup>2</sup> <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-eqia.pdf>

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**1.6** We remain extremely concerned about the budget cuts which have already taken place within the Department and the proposed budget cuts which have been outlined in this consultation. Many of the cuts proposed will impact on 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 Cliff Edge Coalition NI both of which the Women's Regional Consortium is a member. We reference the importance of the mitigations package in Section 2.3.

## **2.0 General Comments**

The consultation document states that the Department will face both resource and capital shortfalls and acknowledges that: *“managing resource and capital shortfalls of this magnitude will undoubtedly have a continued significant and adverse impact on the Department’s ability to deliver public services in 2024-25”*. There is no doubt that with cuts being faced across Departments, cumulative cuts within many Departments, single year budgets, recent high levels of inflation, increased demand for public services, pressure on wages/benefit levels and the ongoing Cost of Living Crisis that the situation is extremely concerning. We wish to highlight the following points which we believe must be taken into consideration when considering likely cuts as a result of this Budget.

### **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 Coronavirus pandemic, the adverse impacts of Brexit particularly in Northern Ireland (for example, Brexit has had an indirect impact on addressing violence against women and girls in Northern Ireland, which is the only nation without a strategy in place to address the issue<sup>3</sup>) 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.

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<sup>3</sup> The Impact of Brexit on Women in Northern Ireland, Equality Commission for NI, February 2024  
[https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/DMU/Brexit-Impact-on-Women\(Feb2024\).pdf](https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/DMU/Brexit-Impact-on-Women(Feb2024).pdf)

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The CEDAW Committee has also cautioned on the dangers of gender neutrality. CEDAW calls for substantive equality<sup>4</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>5</sup>

Gendered social norms restrict and limit women's roles in the economy, thereby contributing to women's economic disadvantage relative to men.<sup>6</sup> Childcare and unpaid care responsibilities combined with other cross-cutting inequalities such as inadequate advancement on women-specific health issues means women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure 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>7</sup> has highlighted that rather than gender-neutral aspects of UC disproportionately affect women. This includes

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<sup>4</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>5</sup> Ibid, paragraph 8

<sup>6</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>7</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/>

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>8</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 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 Census results show that the majority of single parent households are headed by a woman (93%)) are even more vulnerable to poverty. 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>9</sup>

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<sup>8</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>

<sup>9</sup> A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women’s Budget Group, February 2019  
<https://fabians.org.uk/a-female-face/>

***“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 the ones who often give up/do without to absorb debt rather than let it impact on their children. I’ll do without spuds and put the spud on the child’s plate. Women are at the frontline of this.”***

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

As previously stated, 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 by the ongoing Cost-of-Living Crisis.

***“I am now scraping along to provide food and keep a roof over mine and my child’s heads. The cost to survive is atrocious.”***

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

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 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>10</sup> These welfare reform and austerity measures have tended to limit the ability of the system to protect against poverty.<sup>11</sup>

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<sup>10</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>11</sup> Protecting dignity, fighting poverty and promoting social inclusion in devolved social security, Dr Mark Simpson, Ulster University, June 2018



Locally, an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)<sup>12</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>13</sup> and on the impact of Universal Credit<sup>14</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)*

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>15</sup> The Committee

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[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>12</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>13</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>14</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>

<sup>15</sup> Concluding Observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, CEDAW/C/GBR/CO/8, March 2019 (para 17)

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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>16</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 numbers of women with adult care responsibilities, a weak labour market, high numbers of women working part-time and in precarious jobs and wages lower than the UK average.<sup>17</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)*

### **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>18</sup> The New Decade, New Approach agreement<sup>19</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.

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[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>16</sup> Ibid, para 18

<sup>17</sup> Shadow report for the examination of the UK by the Committee on the Convention to Eliminate Discrimination against Women, NIWEP, January 2019

<sup>18</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>19</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)

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The independent Welfare Mitigations Review Report<sup>20</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>21</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 poverty especially for those most impacted.<sup>22</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.

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<sup>20</sup> [Welfare Mitigations Review \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/welfare-mitigations-review)

<sup>21</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.

<sup>22</sup> <https://www.lawcentreni.org/wp-content/uploads/2023/04/CEC-Full-Member-Briefing-May-2023-.pdf>

While we welcome the fact that the EQIA commits earmarked funding in full for the existing welfare mitigations we are very concerned that the EQIA provides no allocation to deliver on new mitigations including offsetting the two-child limit 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>23</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.

***“Universal Credit has put me into debt. At no point before this was I without electric, wondering how I was going to feed my kids for the next few days and sitting with no heat, but now with Universal Credit I am.”***

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

***“What’s even worse is that you don’t get any money for your third child. I only get £40/month for my son through Child Benefit. He’s the one who needs the most – he uses up most of the electricity and gas as he’s anaemic and needs more heat.”***

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

## **2.4 The Impact of the Cost of Living Crisis on Women in Northern Ireland**

The Women’s Regional Consortium and Ulster University carried out detailed research with women on the impact of the Cost-of-Living Crisis on their lives and families. This research was carried out in February and March 2023 with 250 women across Northern Ireland. A research paper summarising the findings was published by the Women’s Regional Consortium and Ulster University in June 2023<sup>24</sup> and the main findings were:

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<sup>23</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>

<sup>24</sup> Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, Women’s Regional Consortium & Ulster University, June 2023 <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

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- 96% of the women felt their financial situation was worse than it was in the previous year.
- 91% of the women reported difficulty paying their bills as a result of cost of living increases.
- The bills the women were finding it most difficult to pay were:
  - 75% food shopping;
  - energy bills - 73% electricity, 52% gas, 30% home heating oil;
  - 38% travel costs;
  - 34% internet bills;
  - 27% school costs.
- The price increases reported as having the biggest impact on women's household budgets were increases in energy bills (90%) and increases in food bills (89%).
- Just over half of the women reported being in debt (56%) and of these 82% reported they had to borrow as a result of cost of living increases.
- 62% of the women reported they had been unable to save recently and 31% reported their savings had decreased. None of the women reported they had been able to increase their savings.
- 90% of the women felt that the Cost-of-Living Crisis had impacted on their physical or mental health or both.
- Of the women who had children, 78% felt that cost of living increases had negatively impacted on their children.
- 92% of the women reported that cost of living increases had negatively impacted on their ability to take part in social activities.
- The actions taken by the women to cope with cost of living increases were:
  - 86% buying cheaper items;
  - 81% cutting energy use;
  - 55% using charity shops/second hand websites;
  - 49% reduced the use of their car/public transport;
  - 47% relying on friends/family for help;
  - 43% skipped meals.

- 78% of the women had felt cold or hungry or both as a result of cost of living increases.
- 41% of the women had needed to use a foodbank/other charitable support due to increases in the cost of living.
- Women reported a number of areas that would help them cope better with increases in the cost of living:
  - 87% increased help with energy bills;
  - 53% cheaper public transport/help with fuel costs;
  - 46% increases in the value of social security benefits;
  - 38% increased help with school costs;
  - 36% better paid work;
  - 36% increased help with housing costs;
  - 31% cheaper borrowing for essential items;
  - 22% increased help with childcare.

The impact of the Cost-of-Living Crisis on women is best summarised by the following quote from a woman who took part in a focus group for the research who said: *“We’re not living, we’re just existing.”*

Rising prices for the most essential items, such as food, energy, transport and clothing meant that many women saw their household budgets being increasingly squeezed. This left little room to afford anything beyond the bare essentials and in some cases meant that women could not even afford the basics for themselves, their children and families. This took a significant toll on their lives impacting negatively on their health and wellbeing.

Women are more likely to do the grocery shopping, more likely to be responsible for household budgets and more likely to be responsible for children’s costs so they are more affected by cost of living increases which are especially noticeable in essential household items.

***“Women normally run the house and do the grocery shopping. I’m the one buying the kids their clothes and managing the finances. You take on the financial impact of it and the constant thinking about it.”***

***“I don’t think anyone recognises the impact of this Crisis on women especially. We have a high level of responsibility and it’s impacting really badly and Government are not taking enough notice. People are suicidal and feel like a failure. I’m lying in bed at night and getting really bad intrusive thoughts to the point where I look at my daughter and think if something happens to me who will look after her? I asked the person in charge in my hostel to ring me in the morning and check if I’m OK. It’s really, really impacting on people and Government need to be more aware of the impacts of this Crisis.”***

***“Sometimes you struggle between turning the heating on and feeding the children. 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.”***

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

## **2.5 Access to Independent Advice**

Women’s Regional Consortium research on the impact of austerity/welfare reform on women<sup>25</sup>, women and debt<sup>26</sup> the impact of Universal Credit on women<sup>27</sup> and women’s experiences of the Cost-of-Living Crisis<sup>28</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

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<sup>25</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>26</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>27</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>

<sup>28</sup> Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, Women’s Regional Consortium & Ulster University, June 2023 <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

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.”***

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

***“People really need help with money especially people with mental health problems. We [voluntary sector group] are helping a woman with mental health issues, severe anxiety and a child with a disability. The thought of sorting out the forms around getting free school meals and other financial help was overwhelming for her. Dealing with all the forms and the system was frightening for her and for many people struggling with mental health. They don’t know where to start. She really needs free school meals and is struggling with money and the worry of it all. People really need help with these things.”***

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

***“The benefits system is so complicated and constantly changing. They don’t make it easy for people to find out things, so you need advice.”***

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

## **2.6 Employment Support**

Over the last 15 years, economic inactivity in Northern Ireland has been consistently higher than the UK average. The latest economic inactivity rate for Northern Ireland is 27.4% which is 5.3 percentage points above the most recent UK rate of 22.1% and is the third highest of the twelve UK regions. The female economic inactivity rate (age 16 to 64) has also been consistently higher than the male economic inactivity rate – the most recent figures show the male rate is 24.1% and the female rate is higher at 30.6%.<sup>29</sup>

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<sup>29</sup> Northern Ireland Labour Market Report, NISRA, July 2024



In looking at the detail of economic inactivity it shows that around a fifth of women who were unavailable for work gave the reason for inactivity as family/home care (39,000 or 21.4%) and this was the least likely reason for male inactivity (at 7,000 or 5.3%). This is an important consideration in terms of employment support as it shows that women are in need of increased employment support in order to be able to move into 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.

## 2.7 Childcare

The Census shows that approximately 29% of households in Northern Ireland have dependent children.<sup>30</sup> Differing childcare support in Northern Ireland from GB means that parents in Northern Ireland are under greater financial pressure with regards to childcare costs. Families in Northern Ireland do not have access to the 30-hours free childcare per week available to eligible families in England with a three or four-year old child.

The Northern Ireland Childcare Survey report for 2023<sup>31</sup> has found that childcare is the biggest monthly bill faced by 41% of families in Northern Ireland costing more than their mortgage or rent payments. It found that the average cost of a full-time childcare place in Northern Ireland is £10,036 a year (an increase of 14% since 2021) and more than the maximum costs supported through Tax-Free Childcare.

The survey also found that:

- 81% of parents report there is not enough provision of childcare in their area.
- 88% of parents have had to change their work arrangements due to the cost of childcare.
- Parents in lower income households are more likely to have had to stop work

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[Northern Ireland Labour Market Report \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/northern-ireland-labour-market-report-2023/)

<sup>30</sup> [Census 2021 main statistics demography tables – household relationships | Northern Ireland Statistics and Research Agency \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/census-2021-main-statistics-demography-tables-household-relationships-northern-ireland/)

<sup>31</sup> Northern Ireland Childcare Survey 2023, Employers For Childcare, December 2023  
<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2023/>

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due to the cost of childcare.

- 63% of stay-at-home parents said they would be able to get back into work if they could access more affordable childcare.
- 89% of working parents said being able to access more affordable childcare would impact on their career including enabling them to progress (63%), or to participate in education, training or skills development (48%).

A report by Employers For Childcare and the Joseph Rowntree Foundation<sup>32</sup> stated that the childcare system has reached “*breaking point*” and that: “*Lower-income families are least likely to benefit from quality childcare, reducing household incomes as a result of working fewer hours or stopping work altogether. Disadvantaged children are therefore missing the benefits of quality provision.*” Of parents from lower income households, 17% with a household income of up to £20,000 reported that they had had to stop working altogether due to the cost of childcare compared to just 1% of parents with a household income of over £70,000.<sup>33</sup>

Compared with OECD member states (the Organisation for Economic Cooperation and Development), Northern Ireland is ranked third highest for the highest share of average household income spent on childcare costs.<sup>34</sup> It is clear from the research that the high cost of childcare in Northern Ireland affects the ability of parents to work and that childcare costs act as a significant barrier to parents entering and staying in the workforce.

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*

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<sup>32</sup> Tackling disadvantage through childcare in Northern Ireland, Employers for Childcare and Joseph Rowntree Foundation, January 2024

<https://www.employersforchildcare.org/report/childcare-brief/>

<sup>33</sup> Northern Ireland Childcare Survey 2023, Employers For Childcare, December 2023

<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2023/>

<sup>34</sup> Economic inactivity, key employment barriers and childcare costs potentially impacting those barriers: initial considerations for Northern Ireland, Northern Ireland Assembly, May 2024

[Assembly Research and Information Service Briefing Paper - Economic inactivity, key employment barriers and childcare costs potentially impacting those barriers: initial considerations for Northern Ireland \(niassembly.gov.uk\)](https://www.niassembly.gov.uk/assembly-research-and-information-service/briefing-papers/economic-inactivity-key-employment-barriers-and-childcare-costs-potentially-impacting-those-barriers-initial-considerations-for-northern-ireland/)

*progress in the workplace.”*<sup>35</sup> The Committee recommended that Government should ensure the availability of affordable and accessible childcare particularly in Northern Ireland.<sup>36</sup>

The availability of accessible, affordable childcare is a key consideration for women’s equality, financial independence, the 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)*

## **2.8 Women’s Sector Funding**

The DfC is an important source of funding for the women’s sector. The Department not only funds a range of activities within women’s sector organisations and Women’s Centres but also an important childcare offering through the Women’s Centres Childcare Fund.

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

The WCCF 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 14 women’s centres operating in disadvantaged communities were kept open pending an Executive decision about their future funding.

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<sup>35</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>36</sup> Ibid, para 46

WCCF enables Women's Centres to provide childcare places that are 100% supported for the most disadvantaged children and families. Women who avail of WCCF supported childcare have an opportunity to access a wide range of programmes available in their local Women's Centre. This support includes: parenting skills, training and education, back to work programmes, counselling, health and wellbeing programmes and a range of advice services. Therefore, WCCF enables the most excluded women in disadvantaged communities access to support as well as engagement in community development activities.

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

These sessional places (77,000 two-hour sessions) also ensure that disadvantaged children have an opportunity to experience a childcare setting, to socialize, interact, play and learn in a supported environment.

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 Anti-Poverty Strategy, the Child 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>37</sup>

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<sup>37</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)

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 contribution that it makes to reducing poverty and 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>38</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% up until 2022. In the last two years the Department has been able to increase this funding slightly to those Centres in receipt of it to enable them to meet cost of living increases.

The Women's Regional Consortium believes that this is a hugely important area of funding for women and children in disadvantaged areas. We argue that any progress on childcare provision in Northern Ireland must recognise the need for low cost/no cost childcare for marginalised women in disadvantaged and rural areas. The Consortium also believes that Government should recognise the case for properly sustaining childcare provision through the WCCF model on a ring-fenced, protected basis given the Fund's positive evaluation<sup>39</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)*

### **2.8.2. 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

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<sup>38</sup> <https://www.communities-ni.gov.uk/about-department-communities>

<sup>39</sup> Evaluation of Regional Support Arrangements for the Voluntary and Community Sector, Final Report, June 2015, DSD and DARD

building block in supporting women to rebuild their confidence and their capability to enter the workplace and is a means to maintaining overall wellbeing. Community based education and training is generally delivered based on local community needs and takes account of the complexity of women's lives and the barriers they face such as education, course fees and the academic environment.

Women's exclusion from participation 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.

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

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 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)*

### **2.8.3. 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 and communities. 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.

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. 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. Of the 14 Women's Centres, three receive funding under the Community Investment Fund (CIF) and/or Neighbourhood Renewal (People and Places) to support longer term community development via funding towards key essential staff salaries and some overhead costs. However, since 2012 these funds have been subject to austerity cuts which has resulted in little or no funding for overheads and in some cases a 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. While there was a small increase of 2% for salaries in 2022/23, well below inflation, and some additional support for running costs in both 2022/23 and 2023/24 to meet the cost of living increases this only went a small way towards meeting organisational overhead increases. The 2% increase in salaries due to be awarded again in 2023/24 was withdrawn due to Departmental budgetary constraints, the Minimum Wage increase was met but not the 'Real Living Wage'

which the Department had encouraged organisations to sign up to. These additional costs had to be met from organisational reserves.

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, Poverty 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 ten consultations, published a research paper, completed field work for another research paper and have brought the lived experience of local women and their views to Government consultations, calls for evidence, policy forums and meetings, strategy formulation and campaigns. 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.



## 2.9 Gender Budgeting and Equality Responsibilities

The Women's Regional Consortium endorses the following statement on Gender Budgeting from our colleagues in the NI Women's Budget Group:

Gender budgeting requires government departments to analyse the different impact of the 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>40</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

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<sup>40</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/>

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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 places at the very end of the budget planning process or after the budget has been finalised. The OECD<sup>41</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>41</sup> OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

## 2.10 Winter Fuel Payment

The Women's Regional Consortium supports the following statement on the Winter Fuel Payment from our colleagues in Age NI:

We are deeply concerned at the Minister's statement on 31<sup>st</sup> August to inform the Assembly that the Northern Ireland Executive has decided to maintain parity with the UK government on the transition of Winter Fuel Payments to a means-tested entitlement. The statement outlines that the First Minister and Deputy First Minister have used the Urgent Procedure process to take this decision following Executive discussion.

Whilst we acknowledge the Minister's opposition to this change in policy, we do not believe the Department should bring this change into effect in Northern Ireland. **In particular, we believe there is a need to undertake an equality impact assessment as there is significant evidence that it will have differential impacts on some Section 75 groups, including a disproportionate adverse impact on women.**

Much of the public response to this unpopular change in policy has focused on the large numbers of older people who will no longer qualify for winter fuel payments but whose income is still small enough that they are struggling with the cost of living. The well-established body of research on the Gender Pension Gap suggests that the people in that income bracket are more likely to be women than men.

The Pensions Policy Institute reports that women have poorer retirement outcomes than men, primarily due to lower lifetime earnings and a great likelihood of career breaks due to childcare and adult care responsibilities. They highlight that women in their late 50s have less than two-thirds of the pension savings as men on average in the UK, a difference that they say is causing significant harm to women's quality of life and dignity in older age.<sup>42</sup> Data from the UK's Family Resources Survey (FRS)

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<sup>42</sup> <https://www.pensionspolicyinstitute.org.uk/media/ysgmnwtl/20240207-underpensioned-defining-the-gender-pension-gap-final.pdf>

2023 demonstrates that the average pension income for single women is £30 per week lower than that for single men.<sup>43</sup>

If the Department implements means testing of Winter Fuel Payments according to the UK government's criteria, it will cause most financial hardship to the older people whose income is slightly above the threshold for means-tested benefits but still relatively low in relation to consistently high living costs. Age UK research from earlier this year demonstrates that energy costs continue to be the greatest source of anxiety for older people with regard to their finances and that 59% of over 60s with a household income under £20,000 worry about their ability to heat their home.<sup>44</sup> Research indicates that the groups most at risk of being in poverty in retirement are single women, people living alone, people who are amongst the oldest age group (over 85 years), people from BAME communities, people who rent from private or social housing, people with a disability, people with caring responsibilities and those who are self-employed. It is clear that this policy change will potentially have differential impacts on a number of Section 75 groups with women most at risk of being pushed into financial hardship.

**We urge the Department to pause the implementation of this harmful policy until a full equality impact assessment has been undertaken, including an exploration of alternative policies and/or mitigating measures to prevent differential adverse impacts on women and other Section 75 groups.** We acknowledge that the cost of Winter Fuel Payments is not part of the DfC budget and would need an additional allocation of resources to be maintained as a universal entitlement. However, we do not think this significant policy and budgetary decision should be taken forward without a full understanding of the equality impacts.

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<sup>43</sup> <https://www.gov.uk/government/statistics/pensioners-incomes-financial-years-ending-1995-to-2023/pensioners-incomes-financial-years-ending-1995-to-2023#overall-income-trends>

<sup>44</sup> <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/cold-at-home-energy-and-col-report.pdf>

### 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 impacts in relation to gender:

- Universal Credit statistics are not currently broken down by gender. However, latest figures available show 39% of Universal Credit claimants were lone parents (the majority of lone parents are women).<sup>46</sup>
- There is no Wealth and Assets survey in Northern Ireland which provides information on the distribution of wealth according to gender.
- Child Maintenance statistics are not publicly available broken down by gender.<sup>47</sup>

It is disappointing to note that the consultation document does not refer to the following reports and research despite the fact that these were all commissioned

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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> Universal Credit Statistics, DfC & NISRA, February 2024  
<https://www.communities-ni.gov.uk/publications/universal-credit-statistics-february-2024>

<sup>47</sup> <https://www.communities-ni.gov.uk/publications/northern-ireland-child-maintenance-service-statistics-data-september-2023-official-statistics>

by the Department and carried out locally. They could provide useful data in relation to gender and other impacts which are relevant to this consultation:

- Career or care, Women, unpaid caring and employment in Northern Ireland, Women's Regional Consortium & Carers NI, February 2024  
[Career or Care \(womensregionalconsortiumni.org.uk\)](https://www.womensregionalconsortiumni.org.uk)
- Women's experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023  
[Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf \(womensregionalconsortiumni.org.uk\)](https://www.womensregionalconsortiumni.org.uk/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf)
- Women living with Debt, Women's Regional Consortium, September 2022  
[Women-Living-with-Debt-1.pdf \(womensregionalconsortiumni.org.uk\)](https://www.womensregionalconsortiumni.org.uk/Women-Living-with-Debt-1.pdf)
- Report from the Gender Equality Strategy Expert Advisory Panel, published by the Department for Communities, March 2021  
[Report from the Gender Equality Strategy Expert Advisory Panel | Department for Communities \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/Report-from-the-Gender-Equality-Strategy-Expert-Advisory-Panel-Department-for-Communities)
- Report from the Anti-Poverty Strategy Expert Advisory Panel, published by the Department for Communities, March 2021  
<https://www.communities-ni.gov.uk/publications/report-anti-poverty-strategy-expert-advisory-panel>
- Report from the Disability Strategy Expert Advisory Panel, published by the Department for Communities, March 2021  
<https://www.communities-ni.gov.uk/publications/report-disability-strategy-expert-advisory-panel#:~:text=The%20Disability%20Strategy%20Expert%20Advisory%20Panel%20was%20appointed%20in%20October,it%20should%20seek%20to%20address>
- Report from the Sexual Orientation Strategy Expert Advisory Panel, published by the Department for Communities, March 2021  
<https://www.communities-ni.gov.uk/publications/report-sexual-orientation-strategy-expert-advisory-panel>
- Discretionary Support Independent Review, published by the Department for Communities, March 2022

<https://www.communities-ni.gov.uk/publications/discretionary-support-independent-review>

- Welfare Mitigations Review – Independent Advisory Panel Report, published by the Department for Communities, October 2022

<https://www.communities-ni.gov.uk/publications/welfare-mitigations-review-independent-advisory-panel-report>

**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 the delivery of benefits, Discretionary Support and employment support. It is vitally important that the Department recognises the contextual factors which increase women's vulnerability to poverty and which impact on their participation in the economy (as outlined in Section 2 of this response) 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:

**Potential Impact of Proposals:**

**i. Social Security Benefit and Pension Delivery, and Child Maintenance**

The consultation document states that the caseload for Universal Credit remains high and there have also been increases in the disability benefits and pensions caseloads. Budgetary shortfalls have meant curtailing recruitment so that 600 full time equivalent posts which were unaffordable in the last year will remain vacant in 2024-25. Added to this funding for staff will reduce by a further 95 full time equivalent posts in 2024-25 representing a 16% increase on the critical vacancies not filled in 2023-24.

This has left the Department operating with insufficient staffing levels which the Department states is “*presently impacting on operational delivery areas.*” The consultation goes on to say that in the longer-term the failure to secure the necessary funding would lead to “*delays in benefit payments, impact on telephony and service delivery performance, and place working age customers in financial hardship.*”

This is very concerning as social security benefits have a vital role to play in easing the impact of poverty. Research already shows that many social security benefit claimants are struggling to make ends meet. Almost every low-income household on Universal Credit is going without the basics (90%) – either experiencing food insecurity, or going without basics like a warm home and essential journeys rising to 95% where deductions are being made, for example, to repay debts to Government.<sup>48</sup>

More people in Northern Ireland have to rely on social security for their income<sup>49</sup> putting them at higher risk of poverty. The number of individuals in working-age families in receipt of Universal Credit or the legacy benefits it replaces is the highest of any of the four UK nations at around a third of families compared to a quarter in the other nations.<sup>50</sup> This is an argument for increased investment in the delivery of these benefits in Northern Ireland. Yet the DWP has recruited significant numbers of additional staff to administer their increased caseloads and Northern Ireland is curtailing recruitment.

Many claimants also struggle with the complexity of the social security system and need access to information, advice and support in order to claim what they are rightfully entitled to. Inadequate staffing numbers will also impact on the ability of the Department to provide information, support and very necessary awareness raising work around entitlement to benefits (see Section 2.5).

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<sup>48</sup> <https://www.jrf.org.uk/report/going-under-and-without-jrfs-cost-living-tracker-winter-202223>

<sup>49</sup> <https://www.consumercouncil.org.uk/sites/default/files/2023-04/FINAL%20VERSION%20-%204%20April%202023%20-%20Household%20Expenditure%20Tracker%20Q4%202022%20%28Oct-Dec%29.PDF>

<sup>50</sup> <https://www.jrf.org.uk/report/poverty-northern-ireland-2022>



***“The pressure they put on you to go into work and the process of trying to sort out your Universal Credit is very stressful. The letters are so confusing. They don’t want to talk to you either – it’s so confusing for people.”***

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

We wish to highlight concerns about inadequate staffing levels within the Child Maintenance Service also. We are unable to find statistics on the Department’s website which detail the gender breakdown of recipients of child maintenance but would assume that the Department has access to this information. It is likely that these figures will show that the majority of child maintenance payments are made to women and therefore women will be more adversely impacted by inadequate staffing levels within the Service. We suggest that these figures should be used to identify possible adverse impacts.

Budget cuts leading to inadequate staffing and delays in benefit payments/child maintenance payments will have serious impacts for many Section 75 groups and these adverse impacts have been identified in the consultation document. The consultation rightly identifies that women are more likely to claim social security benefits and are more likely to earn less over their lifetimes and have poorer pension provision. We reiterate 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, more likely to be lone parents, more likely to have unpaid caring responsibilities and the economic inactivity figures for women are consistently higher (see Section 2).

### *Debt Stock*

We are also 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>51</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 and 60% reported an impact of rising food prices.
- 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.

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.

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<sup>51</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>

***“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.”***

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

***“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?”***

***“There is no give anymore – this time last year I had a wee bit of money set aside if something breaks down or the car needs repaired. But I don’t have that now and it’s worrying. Anything breaks down I just don’t know what to do – it will have to go on a credit card but in the long run that just makes it worse as then you have to pay that off.”***

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

The Women’s Regional Consortium also wish to raise concerns about possible increases in paramilitary lending in Northern Ireland.<sup>52</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.

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<sup>52</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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In addition, research by the University of Ulster found that Universal Credit was repeatedly described as a driver for illegal lending<sup>53</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>54</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 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.

#### *Move to Universal Credit*

We also note with concern that the consultation details *“an immediate risk to service delivery given the additional staff required to deliver on the UK Government led Move to Universal Credit Programme, whereby all individuals on working age legacy benefits will be migrated to Universal Credit.”*

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 in order for the migration process to be successful. We note with concern that the consultation highlights the

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<sup>53</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.consumercouncil.org.uk/illegal-money-lending-report.pdf)

<sup>54</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/policy-report-final-for-web.pdf)

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possibility of 24,000 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 is impacting on service delivery and risks to the wellbeing of staff.

We refer the Department to Advice NI’s report ‘The Move to Universal Credit: Get Ready’.<sup>55</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.

We believe that inadequate staffing for tax credits claimants moving to Universal Credit is bound to affect women disproportionately given that they are the main recipients of Child Tax Credit and that this should also have been noted in the consultation document.

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<sup>55</sup> The Move to Universal Credit: Get Ready, Advice NI, May 2023  
<https://www.adviceni.net/policy/publications/move-universal-credit-get-ready>

### *Universal Credit*

Research by the Women's Regional Consortium on the Impact of Universal Credit on Women<sup>56</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 a strengthening of the existing welfare mitigations package including action to resolve the five-week wait in Universal Credit.<sup>57</sup> While the consultation document states that funding has been provided in full for the existing welfare mitigations it

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<sup>56</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>57</sup> Cliff Edge Coalition, Member Briefing, May 2023 <https://www.lawcentreni.org/wp-content/uploads/2023/04/CEC-Full-Member-Briefing-May-2023-.pdf>

does not include any funding for the strengthening of the mitigations package. This will have implications for 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 39% of Universal Credit claimants were lone parents (the majority of lone parents are women).<sup>58</sup> We believe that inadequate 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 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 2.5) 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 2.8). 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.

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<sup>58</sup> Universal Credit Statistics, DfC & NISRA, February 2024  
<https://www.communities-ni.gov.uk/publications/universal-credit-statistics-february-2024>

## 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>59</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 grant demand has rose to unprecedented levels during the Cost-of-Living Crisis, that £40.3m of grants were issued in 2022-23 and that the Department recognises the vital support that Discretionary Support provides. It goes on to state that in order *“to avoid impacting the current support available to any vulnerable individual or household facing financial hardship, particularly during this continued cost-of-living crisis, the Department will top up the DS Grant Baseline from £13.7m to £22.0m for 2024-25.”* The Department has rightly highlighted in the consultation document that *“with rising poverty levels, failure to sustain Discretionary Support will impact most on those already disproportionately impacted by the Cost-of-Living crisis, including low-income families, disabled people, older people, and women.”*

We welcome the fact that the Department is increasing the DS Grant Baseline to £22.0m for 2024-25 in recognition of the ongoing Cost-of-Living Crisis and rising poverty levels. However, we suggest that even with the increase in the baseline this will be insufficient to meet rising demand for this important source of help for those

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<sup>59</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>

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who are the most vulnerable and marginalised and this is likely to adversely impact on the groups identified by the Department above.

The consultation states that monitoring of the data following cuts to the DS budget in 2023-24 to live within available budgets found no greater adverse impact on any particular Section 75 group and specific to women *“The monitoring data, compiled following the policy changes introduced in July 2023, showed no greater negative impact on lone parents and females compared to claims from all Section 75 groups.”* The Department has not provided the details of this data in the consultation for analysis. Statistics show that 67% of those in receipt of Discretionary Support Grants are women.<sup>60</sup> We therefore find it difficult to understand how restrictions in the levels of funding provided for DS will not have an adverse effect on lone parents and women.

Reductions in the funding for Discretionary Support in 2023-24 and proposed for 2024-25 are concerning given the continued Cost-of-Living Crisis. The consultation document accepts that the Cost-of-Living crisis is ongoing and we know that while inflation has fallen prices are still rising just not as quickly and many people are struggling to afford the essentials. Without access to Discretionary Support, it begs the question if those on the lowest incomes cannot access this 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.

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<sup>60</sup> Changes to the Discretionary Support Scheme July 2023, Draft Equality Impact Assessment, Department for Communities, July 2023  
<https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-changes-to-the-discretionary-support-scheme-eqia.pdf>

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>61</sup> show record levels of need with over 90,300 emergency food parcels distributed in 2023/24, this is an 11% increase on the previous year and the highest number of parcels that the Trussell Trust in Northern Ireland has ever distributed. It is also higher than the respective figures for England, Scotland and Wales. These figures represent more than a 143% increase in the number of parcels distributed five years ago in 2018/19. This points to growing numbers of people in financial difficulty and in crisis situations who may be in need of access to the emergency support provided by Discretionary Support.

Research by the Women's Regional Consortium on the impact of the Cost-of-Living Crisis on Women<sup>62</sup> has shown that many women are struggling to afford the most 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

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<sup>61</sup> Emergency food parcel distribution in Northern Ireland: April 2023 – March 2024, Trussell Trust <https://www.trusselltrust.org/wp-content/uploads/sites/2/2024/05/EYS-Northern-Ireland-Factsheet-2023-24.pdf>

<sup>62</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/>

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.”***

***“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.

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.

### **iii. Employment Support Interventions**

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 specific focus across Government departments.

As we have already outlined in Section 2.6 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 30.6% compared to 24.1% for men.<sup>63</sup>

An analysis of the detail around the female economic inactivity rate shows that around a fifth of women who were unavailable for work gave the reason for inactivity as family/home care (39,000 or 21.4%) and this was the least likely reason for male inactivity (at 7,000 or 5.3%). 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>63</sup> Northern Ireland Labour Market Report, NISRA, July 2024  
[Northern Ireland Labour Market Report \(nisra.gov.uk\)](https://www.nisra.gov.uk/northern-ireland-labour-market-report)

We have detailed in Section 2 that 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.

### **Labour Market Partnerships (LMP)**

Labour Market Partnerships are an attempt to localise employment support and it is welcome that this funding will continue. However, given Northern Ireland's poor economic inactivity figures, disability employment gap and gender pay gap it needs a long-term strategy to address these wider structural issues and considerable investment in these areas. While the funding remains for these it has not been increased and that essentially means a real terms cut given rising prices.

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 community and voluntary sector partners to support 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.

### **JobStart (Youth 16-24 year olds) and other parity employment interventions**

It is very concerning that the consultation states that *“the Department will be unable to progress an extension of its very successful JobStart Scheme and take forward other parity employment support interventions in 2024-25.”* It is particularly concerning as the Department states that the Scheme has been *“very successful”*. In light of Labour Force Survey data on young people not in education, employment or training (NEET)<sup>64</sup> which shows that there were an estimated 15,000 young people (aged 16 to 24 years) who were NEET in October to December 2023 this is very short-sighted. This data further shows that the NEET rate was 7% for males and 8.2% for females. The inability to progress an extension to this Scheme will therefore have greater adverse impacts for young women.

The consultation goes on to state that *“given the absence of parity funding and continued year-on-year squeeze on Budgets, the Department will be undertaking further review of its existing suite of employment programmes and their longer-term viability.”* As we have outlined in the section above on Employment Support Interventions employment programmes to support and enable people to stay in work are critical given Northern Ireland’s poor economic inactivity figures and the largest disability employment gap in the UK. Any reductions in or the removal of funding for employment programmes would be very worrying especially for women, people with disabilities and minority ethnic communities who are more likely to need employment support.

#### **iv. Supporting People Programme**

Supporting People provides housing support services to assist vulnerable people in to live independently and as the consultation states the Programme helps 19,500 vulnerable people each year. We therefore welcome the increase in funding for this important work which helps to address homelessness and support people with disabilities. This will see benefits across the Section 75 groups including for women

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<sup>64</sup> <https://www.nisra.gov.uk/news/young-people-not-education-employment-or-training-neet-october-december-2023#:~:text=In%20October%20to%20December%202023%20there%20were%20an%20estimated%2015%2C000,males%20and%208.2%25%20for%20females.>

through Women’s Aid refuges. This work is particularly important given the rise in homelessness and addictions that have recently reported in the media.

Homelessness support organisations have highlighted an increase in their work around homelessness and drug abuse without any increase in resources to effectively deal with these problems.<sup>65</sup>

## **v. Homelessness**

As previously outlined there have been noted increases in homelessness and addictions in the media. The Welcome Centre (a Belfast-based charity providing services for people affected by homelessness) has said they have seen a *“real increase in homelessness and in drug taking”* but are meeting these increases *“with the same resources we had available to us 10 years ago.”*<sup>66</sup>

We support the comments made by our colleagues in Housing Rights who have stated in response to this budget allocation that it will be *“devastating to the ability to prevent and alleviate homelessness for years to come. We recognise, however, that the source of this insufficient budget is the Northern Ireland Executive’s decision that, despite a housing crisis and record levels of homelessness, the Department was not allocated adequate funding.”*<sup>67</sup>

The statistics outlined in the Housing Rights response<sup>68</sup> to this consultation are stark and illustrate the scale of the cross-tenure housing crisis in Northern Ireland:

- the current social housing waiting list stands at over 47,000 households.
- 4,784 households, including 5,106 children, are living in Temporary Accommodation, and spending on this has risen to £34.5 million.
- In the Private Rented Sector, which will see a knock-on impact as a result of this budget, average monthly rent has risen from £664 in Q4 2020 to £830 in Q4 2023 driven by a lack of supply in the face of increasing

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<sup>65</sup> [Welcome Organisation: 'Arson attack won't stop us helping' - BBC News](#)

<sup>66</sup> [Welcome Organisation: 'Arson attack won't stop us helping' - BBC News](#)

<sup>67</sup> Response to Consultation on the Department for Communities Budget 2024-25 allocations, Housing Rights, June 2024

[dfc-response-june-2024.pdf \(housingrights.org.uk\)](#)

<sup>68</sup> Ibid

demand. Consequentially, the average private renter spends almost £2,000 more per year to keep a roof over their heads than three years ago.

- Although likely protected to some degree by their tenure status, low-income homeowners face challenges to keep their homes amid the sharp rises in the mortgage interest rate implemented over the last two years. Indeed, there is evidence that this is beginning to have an impact, as the number of possession cases received by the Chancery Division of the Northern Ireland High Court has steadily risen over the same period.

As statistics show there is a housing crisis and a clear need for increased investment in tackling homelessness and providing supports for people who are at risk of homelessness. The consultation highlights that an inability of the Department to increase the homelessness funding allocation for 2024-25 will have impacts across the Section 75 groups but has the potential for greater adverse impacts on:

- Younger people significantly at risk of homelessness
- LGBTQI+ people
- Women and men fleeing domestic violence
- Single people and families
- The disabled and those with complex housing requirements due to their health needs.

Domestic violence is a highly gendered crime as 68% of victims are female and 83% of offenders are male.<sup>69</sup> Therefore insufficient funding to address housing for victims of domestic violence will have a greater impact on women than men.

Access to housing must be complaint with the Istanbul Convention. Article 20 of the Convention<sup>70</sup> states: *“Parties shall take the necessary legislative or other measures*

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<sup>69</sup> <https://www.health-ni.gov.uk/sites/default/files/consultations/health/doh-dsas-draft.PDF>

<sup>70</sup> Council of Europe Convention on preventing and combating violence against women and domestic violence, April 2011  
<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168046031c>



*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.”*

#### **vi. Arms Length Bodies (ALBs)**

The consultation states that the resource allocation for Arms Length Bodies will be held at the Department’s 2023-24 budget position funding level. While the funding remains at current levels it essentially means a real terms cut given rising prices.

The consultation states that the Minister accepts a flat budget allocation is “*not ideal*” and adverse impacts are noted for rights-based work for children and young people and older people. The Department works with a wide range of ALBs therefore a flat budget allocation is likely to have impacts across the Section 75 groups who interact with these bodies.

#### **vii. Voluntary and Community Sector**

We welcome the additional funding for the Community and Voluntary Sector which is included within the EQIA and which recognises the pressures on the sector as well as recognising the “*vital contribution of the Voluntary and Community sector in representing the interests and values of people and communities and in promoting societal wellbeing and resilience.*” We have outlined extensively in Section 2.8 the value of the Women’s Centres and women’s sector in the lives of women, children, families and communities. We ask the Department to note the continued importance of this work and the need for adequate longer-term investment in it.

#### **viii. Rates Support Grant**

The consultation documents a £1.8m reduction on the Rates Support Grant provided in 2023-24. While this has no direct impact on rate payers a reduction in funding to less wealthier Councils during a Cost-of-Living Crisis may have an impact on the provision of Council services. This may in turn have an indirect impact on rate payers. We know that certain groups of people have been more impacted by the Cost-of-Living Crisis including women and this could potentially mean these groups are adversely impacted by this reduction in support.

## **ix. New Build Social Housing and Other High Priority Capital**

Media coverage on an inadequate budget allocation for social housing has highlighted concerns about reductions in new social housing units for this year.<sup>71</sup> The figures will mean that only 400 new social homes would be built in 2024-25 rather than the target of 2,000. We support the assertion made by our colleagues in Housing Rights that this reduction will undermine their commitments in the New Decade, New Approach Agreement to ensure that *“every household has access to a good quality, affordable and sustainable home that is appropriate for its needs.”*<sup>72</sup>

The number of households in priority need of social housing in Northern Ireland is at the highest level on record. In March 2023 there were 45,105 applicants on the social housing waiting list and of these 32,633 were in ‘housing stress’.<sup>73</sup> This can have particularly negative impacts for women, LGBTQI+, ethnic minority communities and disabled people leaving them unable to access suitable housing. Reductions in social housing stock therefore have a disproportionate impact on women who are overrepresented amongst social renters, largely because there are overrepresented amongst those on lower incomes and in housing need.<sup>74</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 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

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<sup>71</sup> <https://www.bbc.co.uk/news/articles/cd1034x9kg4o>

<sup>72</sup> Response to Consultation on the Department for Communities Budget 2024-25 allocations, Housing Rights, June 2024 (Page 5)  
[dfc-response-june-2024.pdf \(housingrights.org.uk\)](#)

<sup>73</sup> <https://datavis.nisra.gov.uk/communities/northern-ireland-housing-statistics-2022-2023.html>

<sup>74</sup> Housing and Gender, Women’s Budget Group, March 2020  
[final-housing-2020.pdf \(wbg.org.uk\)](#)

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.

The consultation document has rightly identified that this will have adverse impacts on women who are more frequently found in social housing and on lone parents who are overwhelmingly female and predominantly in either the private or social renting sector. We are therefore very concerned about the adverse impacts of this budget allocation.

### **Affordable Warmth**

The Affordable Warmth Scheme is an important Scheme, targeted at low-income households and addressing fuel poverty and energy inefficiency. The consultation states that *“Overall, the 2024-25 allocation will reflect only 50% of the total budget allocated in 2023-24.”* This is disappointing when there is a clear need to address energy efficiency where research shows that 60% of homes need to improve their energy efficiency to help Northern Ireland towards reaching its net zero goal.<sup>75</sup> Statistics also show that of all dwellings built before 1930 in Northern Ireland, approximately 90% were rated in bands D to G.<sup>76</sup>

There is also an urgent need to tackle fuel poverty levels where latest available figures show that the rate of fuel poverty in Northern Ireland is at 24%.<sup>77</sup> In September 2023, National Energy Action commissioned market research company LucidTalk to evaluate the impacts of rising energy prices on households. This poll found that 41% of households in Northern Ireland were spending more than 10% of their income on their home energy costs.<sup>78</sup>

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<sup>75</sup> <https://www.bbc.co.uk/news/uk-northern-ireland-65715957>

<sup>76</sup> <https://x.com/NEANIREland/status/1818649603597545597>

<sup>77</sup> <https://www.communities-ni.gov.uk/articles/fuel-poverty-and-just-transition#:~:text=Background%20to%20fuel%20poverty,-The%20extant%20Fuel&text=Fuel%20poverty%20levels%20in%20Northern,in%20recent%20years%2C%20increasingly%20volatile.>

<sup>78</sup> <https://www.nea.org.uk/fuel-poverty-map/fuel-poverty-in-ni/>

We know that many women struggle with the cost of energy particularly during this Cost-of-Living Crisis. Women’s Regional Consortium research<sup>79</sup> shows that 90% of the women who took part in the research said the price increases which had the biggest impact on their household budget were energy bills. This research also found that 78% of the women reported being cold or hungry or both as a result of cost of living increases once again how women once again act as the shock absorbers of poverty in the home – going without heat to protect their children and families from poverty.

***“I don’t put the heat on as much. I don’t like a cold house but I maybe just have it on for one hour for when my son is waking up. The living room is very cold. But we have to watch when we put the heat on.”***

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

***“I’m worried about it being too cold for the baby but I can’t afford to put the heating on.”***

***“Last week I had no money for gas whatsoever. I had to choose between gas and food. We had no gas for a week and it was cold.”***

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

The Consumer Council’s Annual Consumer Insight Survey (August 2023) showed that home energy prices were the top issue about which respondents were most likely to be concerned (85%).<sup>80</sup> A Consumer Council Review of Fuel Poverty levels also showed that women indicated being more worried about fuel costs across the measures included in the survey, for example, women are more likely to say ‘heating our home is a worry at the moment’ (57% compared to 51% of men) and are ‘more

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<sup>79</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/>

<sup>80</sup> The Consumer Council Consumer Insights Survey, February 2023

<https://www.consumer council.org.uk/research/consumer-insights-survey-2023>

likely to want to spend more on heating our home but cannot afford to' (56% compared to 48% of men).<sup>81</sup>

These statistics should also be used in determining the likely adverse impacts on women of a reduction in funding for the Affordable Warmth Scheme.

### **The Urban Regeneration programme**

Stopping investment in urban regeneration projects which aim to create town and city centres where people want to live, work, shop and visit would also likely have adverse impacts on women. A study by the UN Development Program says that “The ‘penalties’ women pay for living in cities include violence, poverty, unequal amounts of unpaid care work, limited job opportunities, and a lack of power in public and private decision-making.”<sup>82</sup>

In most cases, women’s needs are not prioritised in planning, design, and budget for public infrastructure and services. As a result, gender-based inequalities worsen, and many aspects of city life are simply not as safe or accessible for women as they are for men. An example is public transport where research in cities around the world shows significant differences in travel patterns between women and men. Women undertake shorter and more frequent trips for work and are more likely to travel at off-peak hours. Because safety is a primary concern, women navigate more complex routes to access essential services. As a result, their access to public transport is unequal, which hinders their social and economic opportunities.<sup>83</sup>

The consultation points out that *“the retail and hospitality sectors are often predominant in town and city centres”* but fails to note that women are more likely to be employed in these sectors. Research shows that women are more likely to be

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<sup>81</sup> A Review of Fuel Poverty Levels in Northern Ireland, The Consumer Council, May 2022  
[https://www.consumercouncil.org.uk/sites/default/files/2022-10/Research\\_Report\\_Review\\_of\\_Fuel\\_Poverty\\_Levels\\_in\\_NI\\_1.pdf](https://www.consumercouncil.org.uk/sites/default/files/2022-10/Research_Report_Review_of_Fuel_Poverty_Levels_in_NI_1.pdf)

<sup>82</sup> <https://www.weforum.org/agenda/2022/10/designing-cities-for-women-undp-report/>

<sup>83</sup> <https://afsee.atlanticfellows.lse.ac.uk/en-gb/blogs/iwd-why-cities-designed-for-women-work-better-for-everyone>

employed in caring, leisure and other services occupations and in sales and customer service occupations.<sup>84</sup>

### **Capital projects in Culture, Arts and Heritage, Sports and Green growth**

The consultation states that “Capital projects in Culture, Arts and Heritage, Sports and Green growth will either be significantly curtailed or stopped completely in 2024-25.” This is very disappointing given that the previous Executive had agreed to prioritise Green Growth and Social Housing. As has rightly been identified by the Department this will have a negative impact across the Section 75 groups.

### **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 support the concerns raised by our colleagues in the Women’s Policy Group that Departments continue to ask the community and voluntary sector to identify mitigations to their budget proposals. This is not the role of the sector but is the responsibility of the Departments themselves. The purpose of EQIAs is for Departments to consider the potential impacts on Section 75 groups, to not only identify the disproportionate impacts but to identify ways of mitigating against them and seeking opportunities to promote equality for these protected groups.

Guidance from the Equality Commission for Northern Ireland (ECNI)<sup>85</sup> states: *“[Equality] Screening should consider equality impacts, mitigation measures and/or opportunities to further promote equality of opportunity. The higher the level of relevance of a policy to the promotion of equality of opportunity, then the more detailed the consideration of those matters will be required.”*

While this EQIA identifies multiple adverse impacts it does not take an intersectional approach and this means that it has failed to identify some of the impacts. The EQIA also fails in relation to seeking to mitigate these impacts. The consideration of

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<sup>84</sup> Women and the UK economy, House of Commons Library Research Briefing, March 2024  
<https://researchbriefings.files.parliament.uk/documents/SN06838/SN06838.pdf>

<sup>85</sup>  
[https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance\(2005\).pdf](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance(2005).pdf)

mitigating measures and alternative policies is at the heart of the EQIA process. Equality Commission for NI (ECNI) guidance<sup>86</sup> states:

Ways of delivering policy aims which have a less adverse effect on the relevant equality category, or which better promote equality of opportunity for the relevant equality category, must in particular be considered. Consideration must be given to whether separate implementation strategies are necessary for the policy to be effective for the relevant group. The following must be considered:

- How does each option further or hinder equality of opportunity?
- How does each option reinforce or challenge stereotypes which constitute or influence equality of opportunity?
- What are the consequences for the group concerned and for the public authority of not adopting an option more favourable to equality of opportunity?
- How will the relevant representative groups be advised of the new or changed policy or service?
- If an economic appraisal is necessary – What are the costs of implementing each option? Will the social and economic benefits to the relevant group of implementing the option outweigh the costs to the public authority or other groups?
- Does the public authority have international obligations which would be breached by, or could be furthered by, each of the options?

It is clear that the Department has not adequately complied with ECNI guidance in relation to considering mitigating measures and alternative policies in its EQIA. We expect to see the final EQIA comply with ECNI guidance, otherwise it is open to a complaint against the Department for breaching the terms of their equality scheme.

We are very concerned about the adverse impacts of the constrained budget allocation across all Departments including the Department for Communities. Given that DfC has responsibility for anti-poverty and equality issues as well as social security and

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[https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance\(2005\).pdf](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance(2005).pdf) (page 30)

employment support it is vital that the department has the necessary budget to work on these important issues. The wider environment with the ongoing impacts of welfare reform and a Cost-of-Living Crisis and long-term gender inequalities means that the services provided by the DfC 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 the draft budget as we believe that more expenditure is needed not less.

*As the Nevin Economic Research Institute (NERI) states “Northern Ireland’s current funding per head allocation is below that what is needed to provide public services on par with England. This has been the case for a number of years.....Getting into place a fiscal framework which addresses current underfunding and our ongoing funding needs to ensure that Northern Ireland can provide public services in a sustainably financed manner is the only show in town.”<sup>87</sup>*

*Commenting on the budget allocation for this year NERI goes on to say “One of the most significant elements of this budget was the allocation to the Department of Health, which was less than the £1bn sought by its minister. In the budgetary announcement it was stated that it was not sustainable for health to eat up more and more of the budget year on year. This is absolutely true. It is clear that we have to transform health..... But seeking to achieve transformation by just saying ‘you’ve got your fair share’ and thinking that this will force transformation ignores the complexity and cross-departmental changes which are required to transform health. The reasons for the massive increase in health spending do not lie solely in the health service. Social welfare, housing and education all have a role to play here.”*

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, social security, childcare, housing and measures to tackle inequalities including gender.

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<sup>87</sup> <https://www.nerinstitute.net/blog/northern-irelands-budget-and-navigating-northern-irelands-fiscal-challenges>



We believe that given the current circumstances that priority should be given to the payment of adequate social security benefits to provide a safety net for people in these difficult times. We also believe that it is vital that the current mitigations package is strengthened as a matter of priority (see section 2.3). Investing in the social security system is an important way to tackle some of the most adverse impacts of welfare reform and the impact of the pandemic and will benefit many Section 75 groups including women, people with disabilities, people with dependents and people from different racial groups.

We also 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 would damage recovery efforts as it 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>88</sup>

The Cambridge University economist Ha Joon-Chang argues that the mainstream political narrative that welfare spending is a drain and should be reduced is illogical. He asserts that *‘a lot of welfare spending is investment’* and believes that appropriate funding in areas such as unemployment benefits can improve productivity and workforce capability.<sup>89</sup> We are very much in agreement with these statements as spending on social security benefits is spent and not saved and it is spent in local economies. This means that investment in these areas not only provides better results in terms of the individuals concerned but to the wider economy and society in general.

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<sup>88</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/>

<sup>89</sup> Ibid

We are also very much of the belief that spending within the social security system saves money in the long-term as it works to prevent poverty and all the harmful impacts which come from living in poverty. Poverty is harmful to people, families and local communities. Living in poverty has negative physical and mental health impacts and these are often long-term affecting educational attainment, happiness and wellbeing, life chances and even life expectancy. Women's poverty is especially harmful because of the strong links between female poverty and child poverty. It is simply too costly to let poverty take hold and destroy the lives of future generations in Northern Ireland so it must be a priority for the draft budget and for all the actions which come from it.

We suggest that the DfC could use a more targeted approach to spending plans within the draft budget allocation. This would ensure that those who have been the most impacted by the Cost-of-Living Crisis, welfare reform, inequality and poverty are given the help they need to live their lives to their full potential. We encourage the DfC not to take a gender-neutral approach to decision-making and budget allocation (see section 2.1). This would ensure that women who have been disproportionately impacted by these issues are given targeted help to improve their lives and the lives of their children.

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

We have addressed a range of issues throughout Section 2 of this response and we appeal to the Department to take note of the issues raised here by way of mitigating the adverse effects outlined in this consultation. If the issues highlighted in Section 2 are addressed they could make a real difference to the lives of women, families and communities in Northern Ireland. We urge the Department not to take a gender-neutral response in its actions flowing from the budget so that objective need can be properly and effectively addressed.

### *Guidance on Equality Impact Assessment including Mitigations*

We support the following statement from the Women's Policy Group in relation to the Department's EQIA:

*“While we are engaging with this EQIA out of hope that we may influence in-year monitoring rounds, please do not construe our engagement as endorsement of the Department's process in relation to Section 75 and budget formation this year. We believe that the Department has breached their equality scheme in failing to equality screen and EQIA the draft budget at the earliest stage of policy formation. The timing of the current process is such that many of the decisions in the EQIA have already been taken, breaching the legally binding commitments in the Department's equality scheme.*

*We raise this point to make it clear that going forward, we expect the Department to equality screen, EQIA and publicly consult on the draft budget - a process that will be coming up shortly. We also expect that the final EQIA will reflect the Department's actions to mitigate adverse impacts in line with ECNI guidance.”*

We refer the Department to our answer to Question 3 which details ECNI guidance in relation to the identification of mitigations.

### *Timescale to Respond*

While the final date for responses to this consultation is 3<sup>rd</sup> September 2024 allowing for a 12-week consultation period we have been made aware that it is a phased consultation process. Our colleagues at Housing Rights have stated *“although there is a deadline for the length of the consultation of the 3<sup>rd</sup> September 2024 in line with the Department's statutory obligations, the Department is encouraging responses to be submitted earlier if organisations wish to influence policy proposals. In effect, this offers much less time for consultees to make a response and undermines the Department's compliance with its section 75 obligations. In this instance, it has been*

*indicated to Housing Rights that in order to influence decision-making, responses should be received prior to 1<sup>st</sup> July 2024.”*<sup>90</sup>

This leaves just three weeks to respond to what is an important consultation with 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 3 September in reality organisations need to respond by 1 July in order to have any influence over the allocation of funds so therefore this is the de facto date. This 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>91</sup> It is also not compliant with the Department’s statutory obligations under Section 75.

The Women’s Regional Consortium shares Housing Rights concerns that the consultation on this EQIA is phased, particularly since there is no indication on the Department’s website that this is the case.

The Women’s Regional Consortium has raised concerns about this practice previously as it undermines the ability of consultees to influence final budgetary decisions and as our colleagues in Housing Rights state: *“the ability of the Department to comply with its statutory equality obligation to take into account the views expressed by consultees under Schedule 9 paragraph 9(2) of the Northern Ireland Act 1998.”*<sup>92</sup> The Women’s

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<sup>90</sup> Response to Consultation on the Department for Communities Budget 2024-25 allocations, Housing Rights, June 2024 (Page 5)

[dfc-response-june-2024.pdf \(housingrights.org.uk\)](https://www.housingrights.org.uk/dfc-response-june-2024.pdf)

<sup>91</sup> nidirect <https://www.nidirect.gov.uk/articles/public-consultations>

<sup>92</sup> Response to Consultation on the Department for Communities Budget 2024-25 allocations, Housing Rights, June 2024 (Page 5)

[dfc-response-june-2024.pdf \(housingrights.org.uk\)](https://www.housingrights.org.uk/dfc-response-june-2024.pdf)

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Regional Consortium was unable to make a response to the EQIA by 1<sup>st</sup> July due to pressure of existing work.

We refer the Department again to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.<sup>93</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.

### *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>94</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 expected 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>95</sup> The Women's Regional Consortium highlighted the lack of a Rural Needs Assessment in its response to the

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<sup>93</sup> Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017

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

<sup>94</sup> Rural Women's Manifesto, NIRWN, September 2015

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

<sup>95</sup> Mid-Year Population Estimates – Urban/Rural Change, NISRA

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

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Department's Budget EQIA 2023-24 alongside a number of sector colleagues so it is disappointing to see that this was not carried out again.

### *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. Cuts to employment support will adversely impact on women who are more likely to be economically inactive and this will have implications for the Department of the Economy's work to tackle economic inactivity. Taking a silo approach to these cuts by individual Departments is further contributing to the problem.

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>96</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 single mother, 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. A woman from an ethnic minority background who lives in a rural area may be impacted by reductions in social housing provision (proposed by DfC), no increase in funding to the Community Transport scheme

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<sup>96</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>

resulting in decreased availability (proposed by DfI) and no budgetary provision for 2024/25 pay settlements because she works in the health service (proposed by DoH). There is a real need for oversight across the Departments on the cumulative impacts of the proposals within these EQIAs as well as a need for oversight around the development of any potential mitigations taking all these cumulative impacts into account.

### *Long Term Impacts on Government*

We believe that investing in women and families now will result in significant longer-term economic and social benefits in the future including:

- people with higher levels of education/training are more likely to find employment, remain employed and earn more over their working life relative to those with lower levels of education. They are also more likely to live longer and healthier lives.<sup>97</sup>
- providing free childcare through the Women's Centres for example has meant that women have been able to avail of training/education to enable them to apply for jobs they would otherwise not have been able to get resulting in significant improvements in their household finances and family circumstances. *"The whole environment of Women's Centre Derry is like a family, everyone is made to feel welcome and comfortable. I've been able to add to my qualifications at the Centre which has helped me get a job with better prospects and future for my kids. I was able to build my confidence and get the qualification I needed for my new job. Without the Women's Centre I wouldn't have been able to even think about it as childcare is the hardest thing to get and the crèche in the Centre is a huge help that enabled me to further my education and career."*
- addressing inequalities so that women can access long-term, stable employment not only has an impact on the woman herself but long-term has an impact on the future generations they are raising.

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<sup>97</sup> [Review education policies - Education GPS - OECD: Economic & social outcomes](#)

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- investing to remove or reduce barriers for women so that they are able to gain long-term employment puts less pressure on the social security budget leaving more to be distributed to those in need which has clear benefits for individuals and Government.

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

We have attempted to highlight in Section 2 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 proposed budgetary restrictions.

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 and to the ongoing 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 have experienced the same issues.

The consultation notes that the Minister *“values the vital role provided by the Voluntary and Community Sector”* and acknowledges the pressures on the sector providing a funding increase of £1.45m on the budget funding level from last year. It is positive to see this increase in funding which will allow for an uplift in salaries and running costs across the sector. This is much needed as the sector has been operating for many years without seeing the necessary investment in these areas leading to issues of staff burnout, staff retention, loss of experienced staff and



inescapable running costs which have seen significant inflationary rises in the last number of years.

The sector can only continue to support local communities, to advocate for the most vulnerable and contribute to the co-design and co-production of public services if it is adequately and sustainably resourced for this work.

### *Strengthening of the Welfare Mitigations*

As outlined in Section 2.3 we welcome the fact that the EQIA commits earmarked funding in full for the existing welfare mitigations. These important mitigations provide protections to many thousands of people across Northern Ireland against the harsh impacts of welfare reform. However, we are disappointed that the EQIA provides no allocation to deliver on a strengthening of the existing mitigations package.

The Cliff Edge Coalition NI in June 2024 stated in a briefing to the Public Accounts Committee: *“The harsh impacts of new welfare challenges which have emerged since the original mitigations were introduced, and which have been exacerbated by the ongoing cost-of-living crisis, are increasingly affecting households causing financial hardship and poverty. According to research conducted by Inspire in 2022, 79% of adults in Northern Ireland said that their mental health and wellbeing had been adversely impacted by the rising cost of living.”*<sup>98</sup>

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 the DfC’s EQIA. There are a number of reasons for this namely that women are more likely to claim social security benefits and that welfare reform and the ongoing Cost-of-Living Crisis have impacted more on women. Equality statistics on all the Welfare Supplementary Payments show that these were paid to more women than men (57% to women, 43% to men).<sup>99</sup>

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<sup>98</sup> Cliff Edge briefing to Public Accounts Committee Inquiry into Child Poverty, June 2024 <https://www.lawcentreni.org/wp-content/uploads/2024/06/Cliff-Edge-Coalition-Briefing-June-2024.pdf>

<sup>99</sup> Northern Ireland Welfare Supplementary Payment and Discretionary Support Schemes Section 75 statistics November 2017 to March 2023, DfC

As members of the Cliff Edge Coalition we are concerned that the EQIA provides no new allocation to deliver on new mitigations around its three key asks:<sup>100</sup>

- **Removing the two-child limit.** This is a highly gendered policy and likely to have a harsher impact in Northern Ireland due to larger average family sizes compared to GB.
- **Resolving the five-week wait in Universal Credit.** Research by the Women’s Regional Consortium clearly shows the negative impact of the five-week wait on low-income families and women<sup>101</sup>
- **Provide support for private renters affected by the Local Housing Allowance.** Rent has been rising at unprecedented levels in Northern Ireland, almost twice as fast as anywhere else in the UK. As of Q3 2023, the average price per month for a rental property in NI was £810 per month, a 17% increase on the same period in 2021, when it was £691. Single parents (93% of whom are women) are disproportionately impacted by restrictions to the LHA rate. In 2022/23, 40% of single parent households were living in the private rented sector (compared to 23% in 2003).<sup>102</sup> The family type at the highest risk of being in relative poverty was single with children at 38%<sup>103</sup> and are therefore more likely to be in need of support to pay for their housing costs.

### *Welfare Fraud and Error*

The consultation states that similar to the Department for Work & Pensions plans had been developed to increase investment in tackling rising levels of welfare fraud and error but in the absence of additional funding and constrained budgets the additional investment is not “*affordable at this time.*”

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<https://www.communities-ni.gov.uk/publications/welfare-supplementary-payments-discretionary-support-standards-advice-assistance-and-sanctions>

<sup>100</sup> <https://www.lawcentreni.org/cliff-edge-coalition/>

<sup>101</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>

<sup>102</sup> Family Resources Survey: Northern Ireland 2022/23, NISRA & DfC, May 2024  
[Family Resources Survey: Northern Ireland 2022/23 \(nisra.gov.uk\)](https://www.nisra.gov.uk/family-resources-survey-northern-ireland-2022-23)

<sup>103</sup> Northern Ireland Poverty and Income Inequality Report, 2022/23, NISRA & DfC, March 2024  
[Northern Ireland Poverty and Income Inequality Report, 2022/23 \(nisra.gov.uk\)](https://www.nisra.gov.uk/northern-ireland-poverty-and-income-inequality-report-2022-23)

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We suggest that cuts to departmental staffing levels which could help to ensure that claimants have access to the advice and support they need to make their claims effectively could help to tackle issues around fraud and customer error. If claimants are not getting the support they need to make/manage claims because of inadequate staffing levels there could potentially be errors in claims through no fault of the claimant. Latest available figures show that in 2020 it is estimated that 23.1 million was lost through customer error.<sup>104</sup>

We acknowledge the need to tackle benefit fraud with the latest available figures showing that in 2020 it is estimated that £65.2 million was lost through benefit fraud.<sup>105</sup> Despite the fact that no additional investment is outlined in the EQIA tackling benefit fraud has been an area of priority for the Department for a number of years. We suggest that focus must also be given to the areas of unclaimed benefits and official error which also see significant sums involved but which are the subject of much less attention and investment.

We note from our colleagues in Law Centre NI that overpayments in Universal Credit caused by official error rose from 9,596 in 2022-23 to 11,279 in 2023-24 – an increase of 17%. This also represents a financial increase of overpayments from £5,880,989 to £8,476,539.<sup>106</sup> This leaves some claimants facing financial difficulties and living on reduced incomes due to making repayments through no fault of their own. We also agree with Law Centre NI that releasing annual statistics on overpayments caused by official error would help with transparency and allow for improved decision-making processes.

We believe that underclaiming of benefits is a significant issue. It can lead to poverty and financial hardship which has long-term adverse impacts not only for the person who is missing out on the benefits but also for the wider economy and the health service. We could not find local statistics on this issue but nationally a report by

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<sup>104</sup> <https://www.communities-ni.gov.uk/articles/benefit-fraud-cost-and-results>

<sup>105</sup> <https://www.communities-ni.gov.uk/articles/benefit-fraud-cost-and-results>

<sup>106</sup> [Law Centre calls for greater transparency as instances of 'official error' overpayments in benefits continue to rise | Law Centre Northern Ireland \(lawcentreni.org\)](#)

Policy in Practice<sup>107</sup> estimates that the total amount of unclaimed income related benefits and social tariffs is now £22.7 billion a year. The report found that over eight million people could be missing out on an average of £2,700 per year in rights-based benefits. This is an increase of £4 billion on last year's report where they found that £19 billion was going unclaimed. These figures do not include disability benefits and discretionary support but the report estimates that including these elements pushes the true level of unclaimed support to over £30 billion. There is no doubt that the social security system is complex and many people are confused by their rights and entitlements. It is therefore important that investments in tackling this issue would be money well spent across Government departments.

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<sup>107</sup> Missing out 2024: £23 billion of support is unclaimed each year, Policy in Practice, April 2024  
<https://policyinpractice.co.uk/report-missing-out-19-billion-of-support-is-unclaimed-each-year/>

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