



Department of Health  
Castle Buildings  
Stormont  
Belfast  
Northern Ireland  
BT4 3SQ

28<sup>th</sup> August 2024

Dear Department of Health,

Due to pressure of time and workload we are unable to complete a full response to the Department's Budget Outcome for 2024-25 Equality Impact Assessment (EQIA). We wish to fully endorse the Women's Policy Group response (of which we are a member).

Therefore, please accept this letter as the Women's Regional Consortium<sup>1</sup> response highlighting the following concerns and calling on the Department to fully consider the detail of the Women's Policy Group response:

- 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. 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 mitigating measures and

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<sup>1</sup> The Women's Regional Consortium in Northern Ireland 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. The seven groups are: Training for Women Network (TWN), Women's Resource and Development Agency (WRDA), Women's Support Network (WSN), Northern Ireland Rural Women's Network (NIRWN), WomensTEC, Women's Centre Derry and Foyle Women's Information Network (FWIN)

alternative policies is at the heart of the EQIA process. Equality Commission for NI (ECNI) guidance<sup>2</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.

- In terms of the **consideration of available data** we are concerned that updated versions of reports are not being used. By way of examples the EQIA refers to the State of Caring Survey 2022 but an updated version for 2023 is available: [the-impact-of-caring-on-health-in-northern-ireland.pdf \(carersuk.org\)](https://www.carersuk.org/research/state-of-caring-2023) Another example is the Life Expectancy in NI report where the EQIA refers to the 2019-21 report but an updated version for 2020-22 is available: [Life Expectancy in Northern Ireland 2020-22 \(health-ni.gov.uk\)](https://www.health-ni.gov.uk/life-expectancy-in-northern-ireland-2020-22) A final example is the Big Parenting Survey where the EQIA refers to the 2021 findings but an updated version for 2023/24 is available: [Big-Parenting-Survey.pdf \(parentingfocus.org\)](https://parentingfocus.org/big-parenting-survey-2023-24)

- It is disappointing to note that the consultation document does not refer to the following reports and research as 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)
  - Health Inequalities in Northern Ireland: The Impact of the Cost of Living Crisis on Women's Health, WRDA, February 2024  
<https://wrda.net/wp-content/uploads/2024/02/Key-Research-Findings-CoL-Crisis-Health.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/publications/report-gender-equality-strategy-expert-advisory-panel)
  - 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%20see%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>
- We are generally concerned about the lack of gender related data which has been considered in the EQIA and believe that this could be a reason why some of the gendered and other impacts have not been properly identified.
- **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>3</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.

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<sup>3</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>

- We point the Department to the need for **Gender Budgeting** which has the aim of ensuring that the distribution of resources creates more gender equal outcomes. We support the following statement on Gender Budgeting from our colleagues in the Northern Ireland Women’s Budget Group: *“Gender budgeting is good budgeting; it encourages greater transparency of government processes, more in-depth assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures will create a firewall to prevent such disproportionate disadvantages in future.”*
- There is no mention in the EQIA of funding for the promised **Mother and Baby Unit** which would have continued adverse impacts on women if funding is not allocated.
- **No 2024/25 pay settlements for Health and Social Care staff.** The EQIA rightly identifies that no budgetary provision for 2024-25 pay settlements to staff will have greater adverse impacts for women who are more likely to be employed in Health & Social Care (over three quarters (78%) of staff were female and 22% were male).<sup>4</sup>
- **Cease Core Grant Funding completely in 2024/25.** We have serious concerns over the proposal to cease core grant funding completely in 2024/25. A 50% cut to core grant funding last year has already threatened the sustainability of organisations and is damaging to the sector as a whole. Children in Northern Ireland’s survey of core-funded organisations in 2023 showed that 62% would risk collapsing if the grant scheme ceased in 2024/25.<sup>5</sup> The complete loss of core grant funding to organisations like Women’s Aid Federation would have adverse impacts for women as the majority of victims and this was not identified in the EQIA.
- **Reduction in payments for support services provided by the Community and Voluntary Sector.** The EQIA did not identify that women would be disproportionately adversely impacted by this reduction. If services are reduced in the community this is likely to impact more on women who are more likely to provide unpaid care than men (60% of unpaid carers are women in Northern Ireland).<sup>6</sup> In addition, most staff within the Community and Voluntary sector are women, with women comprising almost three quarters of paid employees.<sup>7</sup>
- **Reductions in Waiting List Initiative (WLI) activity.** Northern Ireland has some of the worst waiting lists in the UK with a quarter of the population on a

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<sup>4</sup> [Northern Ireland Health and Social Care Workforce Census March 2024 \(health-ni.gov.uk\)](https://www.health-ni.gov.uk/news/2024/03/2024-workforce-census)

<sup>5</sup> <https://www.ci-ni.org.uk/open-letter-to-minister-of-health-re-core-grant-funding/>

<sup>6</sup> <https://www.niassembly.gov.uk/globalassets/documents/raise/publications/2022-2027/2024/economy/0824.pdf>

<sup>7</sup> [Workforce | NICVA](#)

hospital waiting list and half of patients waiting over a year for treatment.<sup>8</sup> This should therefore be a priority for action. Poor provision in terms of health and social care contributes to Northern Ireland's high levels of economic inactivity something which the Department for the Economy is keen to address. This will therefore inevitably have impacts for work in other areas of Government and the EQIA fails to recognise the inter-connectedness of these issues.

- **Reduction in funding for Enhanced GP Services.** We note that the EQIA states that this will include cessation of services including those for carer's health. The EQIA fails to identify that this will have disproportionate adverse impacts for women who are more likely to provide unpaid care. Living in poverty is a major driver of ill-health, and more than two-thirds of carers (69%) said the increased cost of living is having a negative impact on their physical or mental health.<sup>9</sup> This illustrates the need for focus and investment in the health and wellbeing of unpaid carers who are saving Northern Ireland's health service £5.8 billion in care costs each year.<sup>10</sup>
- **Restriction of domiciliary care packages.** Cuts to domiciliary care packages will disproportionately impact on women who provide the majority of unpaid care and who are more likely to work in the care sector. Over three quarters (78%) of those employed in Health & Social Care were female.<sup>11</sup> The EQIA fails to recognise these disproportionate impacts on women.
- **Reduction of 500 independent sector care home beds.** The EQIA fails to identify the disproportionate adverse impacts on women who are more likely to provide unpaid care and more likely to be employed in the health & Social Care sector.
- **Reduction of Hospital Beds.** Once again, the EQIA fails to identify the disproportionate adverse impacts for women who are more likely to have to provide increased levels of unpaid care to service users waiting on these beds. A reduction in hospital beds may also result in a reduction in associated health care staff who as previously outlined are more likely to be female.
- **A reduction in staffing of 1,200 provincewide.** The EQIA rightly identifies that this will have a differential impact on women who are more likely to be employed in the Health and Social Care sector. However, it fails to also acknowledge that reductions in health service staffing pushes the care for service users onto unpaid carers who are more likely to be women.

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<sup>8</sup> <https://www.economist.com/britain/2024/05/30/half-of-northern-irish-patients-wait-over-a-year-for-treatment>

<sup>9</sup> <https://www.carersuk.org/media/gftldxlp/the-impact-of-caring-on-finances-in-northern-ireland.pdf>

<sup>10</sup> <https://www.carersuk.org/news/unpaid-carers-saving-ni-s-health-service-5-8-billion-per-year-research-shows/#:~:text=year%2C%20research%20shows-,Unpaid%20carers%20saving%20NI's%20health%20service,billion%20per%20year%2C%20research%20shows&text=People%20providing%20unpaid%20care%20for,the%20ESRC%20Centre%20for%20Care.>

<sup>11</sup> [Northern Ireland Health and Social Care Workforce Census March 2024 \(health-ni.gov.uk\)](https://www.health-ni.gov.uk/news/northern-ireland-health-and-social-care-workforce-census-march-2024)

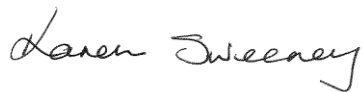
- While we are pleased to see that a **Rural Needs Assessment** has been attempted this year (there was no RNA for the 2023-24 Budget EQIA) it is extremely light on detail and fails to identify the rural impacts in a region with a significant rural population (36% of the population live in rural areas).<sup>12</sup> Many of the reductions outlined in the EQIA will have greater adverse impacts on rural dwellers who are more likely to have to travel greater distances to access limited services.

This response has been undertaken collaboratively by the Women's Regional Consortium and endorsed by the following Women's Centres:

Ballybeen Women's Centre  
Chrysalis Women's Centre, Craigavon  
First Steps Women's Centre,  
Dungannon  
Footprints Women's Centre  
Greenway Women's Centre, Belfast  
Strathfoyle Women's Activity Group

Women's Centre Derry  
Waterside Women's Centre  
Windsor Women's Centre  
Falls Women's Centre  
Shankill Women's Centre  
Kilcooley Women's Centre  
ATLAS Women's Centre, Lisburn

Kind Regards



Karen Sweeney  
Director, WSN

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<sup>12</sup> Mid-Year Population Estimates – Urban/Rural Change, NISRA  
<https://www.daera-ni.gov.uk/publications/mid-year-estimates-population-change>