



PfG and NICS of the Future Division
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(Submitted via email to: PfGconsultation@executiveoffice-ni.gov.uk)

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Dear Executive Office,

Due to pressure of time and workload we are unable to complete a full response to the Executive Office's draft Impact Assessments conducted for the draft Programme for Government 2024-2027 'Our Plan: Doing What Matters Most'. We wish to fully endorse the Women's Policy Group (WPG) response (of which we are a member).

Therefore, please accept this letter as the Women's Regional Consortium¹ response highlighting the following concerns and calling on the Executive Office 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 Government Departments continue to ask the community and voluntary sector to identify **mitigation measures for adverse impacts and alternative options to promote equality of opportunity and good relations**. 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 the EQIA identifies multiple adverse impacts, it does not identify them all and

¹ 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)

it also fails in relation to seeking to mitigate these impacts. The consideration of mitigating measures and alternative policies is at the heart of the EQIA process. Equality Commission for NI (ECNI) guidance² 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 Executive Office 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 for breaching the terms of their equality scheme.

- The EQIA process flow chart is provided in Figure 1 on page 3 of the draft Equality Impact Assessment document but is not reflective of the actual process used in this instance particularly around levels of engagement.
- In terms of the **consideration of available data and research** we are disappointed that a more complete range of data has not been considered including that from the community and voluntary sector which provides often missing qualitative data which would be invaluable in formulating the Programme for Government and assessing the equality impacts. We provide below a list of some reports and research (not exhaustive) which we believe

should have been used to provide useful data in relation to gender and other impacts which are very 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/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%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>
- "When you know what they are capable of": Paramilitary-related Gendered Coercive Control, September 2024
<https://foylewomensaid.org/when-you-know-what-they-are-capable-of-paramilitary-related-gendered-coercive-control/>
- Call for evidence on the effect of paramilitaries on society in Northern Ireland, Women's Regional Consortium submission to the Northern Ireland Affairs Committee, 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>
- We point The Executive Office to the good example provided by The Department for Infrastructure's Budget 2024-25 EQIA³ in terms of its consideration of data and available research.
- In terms of the data presented on gender for example it appears to be a list of random data. There does not seem to any rationale for the data presented and

³ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/eqia-consultation-budget-2024-25.pdf>

no apparent link between some of the data presented and how it connects to the Programme for Government. The assessment of impacts section in relation to gender is therefore weak because of the limited amount of data used. This section also refers to progress on the Social Inclusion Strategies. However, the Department for Communities have confirmed that progress is ongoing on the Anti-Poverty Strategy and the Disability Strategy but not on the Gender or LGBTQI+ Strategies so in reality this is inaccurate and misleading.

- 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.
- We agree with Women's Policy Group concerns about the format of this consultation exercise with a poorly drafted tick box grid format which we are concerned will not provide any useful information and could undermine the purpose of the impact assessment. There are few options presented to choose from and no way to capture the fact that some actions will have one impact and others will have another. In some instances the impacts are not clear cut and the format of the consultation is too narrow boxing people into a limited choice of options.
- The EQIA consultation does not list the priority areas in the Programme for Government and the actions coming from these individually so it is impossible to detail the impacts. We agree with our Women's Policy Group colleagues that suggesting that *"the whole PfG will have a specific outcome for one demographic or another is misleading as it inevitably cannot capture all of the actions implied by the Programme for Government as a whole."*
- An EQIA is only as good as the policy it is assessing. Unfortunately, we had a number of concerns about the draft Programme for Government including that some important priority areas were missed and that it was weak on detail around actions, timescales and outcomes. This can only result in weak EQIAs.
- **Intersectionality** recognises that people can experience discrimination on the basis of multiple and intersecting identities. As highlighted by the Gender Equality Strategy Expert Panel⁴ 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 despite identifying multiple impacts.
- We share the confusion of our Women's Policy Group colleagues about the grid on page 55. This may have provided an overall analysis of the impacts but we cannot understand how any groups are not considered under the "people" mission (currently does not include sexual orientation or marital status) and why under the "peace" mission disabled people and dependants are not included. Using this grid format also does not help in terms of any intersectional analysis.

⁴ 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>

- **Rural Needs Assessment** – we are concerned about the methods/information sources used to identify the social and economic needs of people in rural areas. This has disappointingly not included consultation with rural stakeholders which we suggest should have been part of this process. The RNA provides a list of seemingly random statistics but no proper analysis has been carried out in relation to rural impacts and none of the adverse impacts that are identified have details of any mitigations included (see above point in relation to Equality Commission guidance on the identification of mitigations).
- **Child Rights Assessment** – the quality of this document is to a much higher standard as it links the actions to children’s human rights instruments and measures the commitments against these. This is clearly testament to the involvement of NICCY who are best placed to do this work and have significant direct engagement with young people which is essential to this process.
- Finally, 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 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. Intersectional 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 crisis⁵. 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

⁵ MacDonald, E.M. (2018) The gendered impact of austerity: Cuts are widening the poverty gap between women and men. British Politics and Policy at LSE. <https://blogs.lse.ac.uk/politicsandpolicy/gendered-impacts-of-austerity-cuts/>

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

budgeting; it encourages greater transparency of government processes, more in-depth assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures will create a firewall to prevent such disproportionate disadvantages in future.

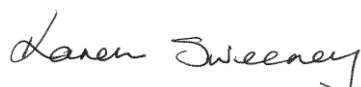
We recognise that the current equality screening and impact assessment duties under Section 75 provide policy infrastructure that could be used to progress gender budgeting. The EQIA process allows space to identify budget impacts on equality groups and opportunities to promote more gender equal outcomes. 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 gender equality outcomes. Additionally, Section 75 screening and impact assessment typically takes place at the very end of the budget planning process or after the budget has been finalised. The OECD⁶ 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.

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

⁶ OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.