



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

Response to: Consultation on policy changes to the Social Fund Winter Fuel Payment Scheme

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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.¹ 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 Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women's Regional Consortium appreciates the opportunity to respond to the Department for Communities (DfC) Consultation on policy changes to the Social Fund Winter Fuel Payment Scheme.

1.5 We wish to endorse the response made by the Women's Policy Group of which we are a member and urge the Department to take their evidence fully into consideration.

2.0 General Information

The Women's Regional Consortium supports the following statements from Age NI and the Fuel Poverty Coalition with reference to the decision to means test the Winter Fuel Payment:

“Age NI is profoundly disappointed at the decision by the NI Executive to means test Winter Fuel Payment. This decision, we believe, will leave so many older people not receiving the vital help they need to stay warm this winter.....Our fear is that more older people will have to choose between heating their home or eating. We also know the detrimental impact living in a cold home can have on health, such as increased risk of respiratory infections, heart attacks and stroke, so this is a decision that could potentially affect an older person's health as well as their finances, which will inevitably lead to increased pressures on our health service.....We are calling on the Communities' Minister to urgently publish the Anti-Poverty Strategy and identify how they will support older people who will now be at greater risk of poverty and in need of extra help this winter.”²

“FPC members remain deeply concerned about the changes to the Winter Fuel Payment eligibility, which leave many low-income, vulnerable pensioners – especially those just above the threshold – without support, increasing their risk of living in cold, damp homes. Older people can also face additional energy expenses due to disability or care needs, and they are more likely to have larger heating bills due to living in poorly insulated homes with inefficient heating systems. While further analysis of the changes' impact should be conducted, it won't address the immediate issues for next winter. Urgent action is needed to plan and provide support for affected pensioners now and in the years ahead.”

² <https://www.ageni.org/news/statement-from-age-ni-regarding-communities-minister-decision-to-means-test-winter-fuel-payment/>

We wish to highlight a number of reasons why the decision to means test the Winter Fuel Payment will have a greater impact on women:

- Women are more likely to live in poverty and have been more impacted by welfare reform policies
- Women are more likely to be in receipt of social security benefits
- Women have longer life expectancy
- Women are more likely to be in low-paid, part-time and insecure work keeping their incomes lower over their lifetimes
- Women are more likely to provide care either for children or other family members limiting their ability to undertake paid work
- Women are more likely to have to make up for cuts to public services through unpaid work
- Pension wealth for women is much lower than men and women are less likely to have retirement savings than men.

All these factors contribute to keeping women's incomes generally lower over their lifetimes and therefore puts them at greater risk of living on a low-income and in poverty.

As highlighted by the Gender Equality Strategy Expert Panel Report³ there are strong links between low income, unemployment and fuel poverty. The expert panel report referred to data from the House Condition Survey 2016, which is now badly out of date, but it does indicate that more female households are likely to be in fuel poverty – 31% of households with a female household reference person are in fuel poverty compared to 16% of households with a male household reference person.

Benefit statistics show that of those claiming the state pension 54% are women and 46% are men. For Pension Credit (which provides a top up to the state pension for

³ 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://communities-ni.gov.uk)

those on low incomes) 60% of claimants are women compared to 40% of men (November 2024).⁴

Women make up the majority of older people yet they are more likely than men to retire with no other pension income and lower pension pots. By the time a woman reaches state pension age (currently 67), they will have average pension savings of £69,000. This is £136,000 less than the average man, who will have saved £205,000.⁵ Low pay and part-time work mean that women's pension contributions are considerably smaller than those of men and large numbers of women do not qualify to be auto-enrolled or are ineligible.

The average pension pot size in Northern Ireland is £13,844 compared to the UK average of £20,077. PensionBee research revealed a 38% gap between male and female pension pots across the UK. The figures for Northern Ireland show a 44% gap (male £16,390 and female £9,136).⁶

2.1 The Impact of the Cost-of-Living Crisis

Research by the Consumer Council shows 90% of consumers in Northern Ireland are concerned about the rising cost of basics. The cost of home energy tops consumer concerns at 91%, followed by food and non-alcoholic drinks (80%). To cope with these rising costs over a quarter (27%) of consumers reported eating poorer quality or less nutritious food and 24% said they had been skipping meals or eating fewer times in the day (23%).⁷

The Women's Regional Consortium and Ulster University carried out detailed research with 250 women in Northern Ireland on the impact of the Cost-of-Living Crisis on their lives and families. A research paper summarising the findings along

⁴ Northern Ireland Benefits Statistics Summary November 2024, NIRSA & DfC, February 2025
<https://www.communities-ni.gov.uk/system/files/2025-02/benefits-statistics-summary-nov-2024.pdf>

⁵ <https://www.nowpensions.com/about-us/fair-pensions-for-all/gender-pensions-gap/>

⁶ <https://www.pensionbee.com/uk/pension-landscape>

⁷ Consumers' views and behaviours in response to the rising cost of basics, The Consumer Council, March 2024
<https://www.consumercouncil.org.uk/news/90-consumers-concerned-about-rising-cost-basics>

with a shorter summary document and a topic summary specific to the costs of education are all available on the Women's Regional Consortium website here:

- **Full research paper:**

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

- **Summary leaflet:**

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/03/The-Impact-of-the-Cost-of-Living-Crisis-on-Women-in-NI-In-Brief-1.pdf>

Women often bear the brunt of poverty in the home managing household budgets to shield other family members from its worst effects. This means that women end up acting as the 'shock absorbers' of poverty going without food, heat or clothes in order to meet the needs of children and/or other family members when money is tight.⁸ These actions taken by women are often unseen within the home and given little attention or focus in terms of policy.

"They put the old age pension up so I'm getting an increase in April but the forecast on my broadband /TV is going to eat it all up. My rent is going up too. It's all going up so I won't see it, I won't be any better off. It disappears before you even get it."

I go to things like this [focus group] or other programmes that get me out of the house and I can keep warm and not put my own heat on. I just go and sit anywhere else when I'm cold to get heat in other places. I have gas heating and it's very expensive."

"My husband and I are both on blood thinners – we need the heat on because we really feel the cold."

"I am a carer for my husband and he has to be kept warm it doesn't matter what, I have to keep the heat on. He has a very low immune system and I have to make sure he's kept warm and fed well. The cold weather brings him down. We had to have the heating on 24/7 regardless of the price. We had to have 3 fills of oil during the Winter - £900 a time. There are things you just have to do."

⁸ A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women's Budget Group, February 2019
<https://fabians.org.uk/a-female-face/>

“Times I would be changing the bed every other day due to my husband’s sweating. In terms of your electricity costs I just have to go with it. These are the things that other people don’t realise when you’re a carer. You’re doing without other things to pay for the things you have to pay for.”

“I care for my mother who is 84 and immobile. Her heating has had to be on more and it is taking way more money for gas than it did trying to keep her warm enough. She has a hospital bed (she needs it because it’s adjustable), a hoist, an electric cushion to stop her getting bedsores. All these extra electric things are running as well all day every day. Her electricity has really soared as well not just in terms of how much it is used but in the cost of it as well it’s crazy. I’m trying to take her out an odd time for a wee break and change of scene but the money’s just not there for it anymore. I have access to accessible transport and they’re great, I pay £2.50 for it. But it’s taking that much now for the basics. I’m trying to buy in things to give her some variety and choice but even with that I’m having to be cautious what I’m buying as the money’s just not there.”

“My elderly parents live with me, my mother is paralysed and I have to have the heat on constantly as she is always freezing – this has had a massive impact on my gas bill.”

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

2.2 Welfare Reform/Austerity Policies and Women

The social security system has a vital role to play in easing the impact of poverty on people and families. As the Covid19 pandemic 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. However, the safety net provided by the social security system has been weakened by a decade of welfare reform changes meaning that many people are unable to meet the costs of essential items such as food, heat and clothing and are unable to cope with unexpected life events such as a washing machine breaking down.

Welfare reform and austerity 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.⁹

⁹ 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>

In Northern Ireland an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)¹⁰ showed that across most income levels the overall cash impact of the reforms is more negative for women than for men.

2.3 Unpaid Care, Women and Poverty

People providing unpaid care for sick or disabled family members collectively save Northern Ireland's health service £5.8 billion in care costs each year.¹¹ Providing unpaid care is a gendered issue with women more likely to provide this care. Nearly 60% of unpaid carers are women and women have a 70% chance of providing care in their adult life and are more likely to care early in their life.¹² Nationally statistics show that by the time they are aged 46, half of women have been a carer.¹³ This has clear implications for gender equality and the ability of women to work and reach their full potential.

Women's Regional Consortium research with Carers NI¹⁴ shows that inadequacies in wider support services, including social services, healthcare, education and childcare, are stopping women with unpaid caring roles from staying in employment altogether or limiting the amount of work they can do. This research also showed that women "juggle" their caring role and employment often at the detriment of their own career, finances and health and wellbeing.

One in four unpaid carers in Northern Ireland (25%) are living in poverty – significantly more than Northern Ireland's non-carer population (16%) and higher than

¹⁰ 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

¹¹ Valuing Carers 2021, Northern Ireland, Carer's NI and Centre for Care, November 2023

<https://www.carersuk.org/media/irkn5e00/valuing-carers-northern-ireland.pdf>

¹² Career or Care, Women, unpaid caring and employment in Northern Ireland, Women's Regional Consortium & Carers NI, February 2024

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>

¹³ Will I care? The likelihood of being a carer in adult life, CarersUK, November 2019

http://www.carersuk.org/images/News_campaigns/CarersRightsDay_Nov19_FINAL.pdf

¹⁴ Career or Care, Women, unpaid caring and employment in Northern Ireland, Women's Regional Consortium & Carers NI, February 2024

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>

the carer poverty rate across the UK (23%). This means around 55,000 unpaid carers are living in poverty.¹⁵

¹⁵ The experiences of poverty among unpaid carers in Northern Ireland, Carer Poverty Commission, August 2023
<https://www.carersuk.org/media/jb0ah2xh/the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf>

3.0 Specific Questions

1. Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 3 of the EQIA consultation document? If so, what are they, please provide details?

It is disappointing to note that there is no information or data recorded for male and female Winter Fuel Payment recipients as statistics on gender is not a variable that is held in the Winter Fuel Payment data. We suggest that going forward that the gender breakdown (as well as data on other Section 75 equality categories) should be recorded.

The consultation refers to the most recent House Condition Survey (published in 2018) in relation to fuel poverty. We are concerned that the data in this survey is now considerably out of date and therefore of limited use for this consultation. We refer the Department to LucidTalk polling commissioned by NEA NI which suggests that *“over 40% of adults in the country say they are spending more than 10% of their total household expenditure on energy costs, meaning they are fuel poor.”*¹⁶ This polling also shows that 27% of households said they went without heating (oil/gas) or electricity at a point during the last 24 months because they could not afford the costs of energy.

Respondents also said other coping mechanisms to deal with the rising energy prices and the cost of living included:

- reducing the use of central heating in their home (70%)
- using alternative heating sources such as coal fires and fan heaters (36%)
- sitting in a cold house wearing coats, blankets or using a hot water bottle (36%)
- reduced use of hot water (27%)
- skipping meals (9%).

We also suggest that the Department should have made reference to Census figures on the composition of the Northern Ireland population who are aged 65+.

¹⁶ <https://www.nea.org.uk/publications/lucidtalk-nea-ni-september-2024-northern-ireland-ni-attitudinal-poll/>

Census figures show that 326,477 residents are aged 65+ of which 176,199 are females (54%) and 150,278 are males (46%).¹⁷ Analysing NISRA data for older pensioners shows that in mid-2023, males accounted for 36.7% of those aged 85 and over and females for 63.3%.¹⁸ These figures show the longstanding trend for women to live longer than men. This means that women are more likely to benefit from the Winter Fuel Payment and therefore reducing eligibility for the payment will impact more on women than men.

The consultation document makes no reference to important data produced by the Community and Voluntary sector which could be useful in terms of providing a fuller picture of how changes to this policy impact different equality groups. There is a need for Government departments to look beyond 'official' data and to take into account data that exists from other sources in all cases but especially where there is no or limited official data. We suggest the Department should have considered data, needs and issues identified from the following sources:

- Women's Regional Consortium research on Women's Experiences of the Cost-of-Living Crisis, June 2023
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>
- Women's Regional Consortium research on Women living with Debt, September 2022
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/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/government/uploads/system/uploads/attachment_data/file/100000/Report_from_the_Gender_Equality_Strategy_Expert_Advisory_Panel_Department_for_Communities.pdf)
- Report from the Anti-Poverty Strategy Expert Advisory Panel, published by the Department for Communities, March 2021

¹⁷ <https://www.nisra.gov.uk/publications/census-2021-main-statistics-demography-tables-age-and-sex>

¹⁸ <https://www.nisra.gov.uk/system/files/statistics/MYE23-summary.pdf>

<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>

- NEA NI commissioned LucidTalk polling on Fuel Poverty, November 2024
<https://www.nea.org.uk/publications/lucidtalk-nea-ni-september-2024-northern-ireland-ni-attitudinal-poll/>

- A New Fuel Poverty Strategy for Northern Ireland, National Energy Action NI, Fuel Poverty Coalition, October 2023
<https://fuelpovertyni.org/wp-content/uploads/Fuel-Poverty-Strategy-for-NI-Report-Final.pdf>

- The experiences of poverty among unpaid carers in Northern Ireland, Carer Poverty Commission, August 2023
<https://www.carersuk.org/media/jb0ah2xh/the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf>

Also the Department should note an ARK research paper¹⁹ which found that around 25% of households in Northern Ireland could not afford to pay an unexpected £500 bill and just over 24% of households reported having to turn the heating down or off due to costs (over half (52.1%) of respondents who described themselves as low income had turned the heating down or off because they could not afford it). Respondents who reported financial hardship were asked to identify how they have been coping and 44.6% reported borrowing from friends and family and 26.6% reported increasing credit card debt.

¹⁹ The Other Division in Northern Ireland: public attitudes to poverty, economic hardship and social security, ARK Research Update, May 2022
<https://www.ark.ac.uk/ARK/sites/default/files/2022-05/update146.pdf>

We are also disappointed that there is no mention of rural impacts in the EQIA. This is particularly concerning as rural pensioners are more likely to experience relative poverty than their urban counterparts (19% in rural areas, 13% in urban areas).²⁰ Many rural pensioners experience higher living costs including for heating. Consumer Council NI research²¹ shows that those living in rural areas (50% vs 37%) were more likely to say their home is cold or uncomfortably cold in winter. Those living in rural areas (58% vs 50%) reported being more likely to want to spend more on heating their home but cannot afford to.

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

The lack of data in the EQIA which relates to the Section 75 equality groups makes it more likely that possible adverse impacts for these groups will not be identified. The Department should consider the additional data listed in our answer to Question 1 in order to better identify adverse impacts.

We also refer the Department to Section 2.0 of our response which outlines the reasons why women may be more adversely impacted.

The Women's Regional Consortium also wish to support the adverse impacts identified by UNITE the Union which are:

- Older pensioners (80+) at higher risk from cold-related illnesses. The Women's Regional Consortium would add that older pensioners are more likely to be women as detailed in Section 2.0 of this response.
- Disabled pensioners with higher energy needs.
- Ethnic minorities facing language barriers who are excluded due to lack of outreach.

²⁰ <https://www.daera-ni.gov.uk/news/key-rural-issues-2023-publication>

²¹ 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

3. For those pensioners who will no longer receive the Winter Fuel Payment, what are your views on the mitigations as outlined in this EQIA consultation document?

We welcome the fact that the Department has outlined mitigations to help address the adverse impacts of removing the Winter Fuel Payment from some pensioners in the EQIA.

While the Women's Regional Consortium welcomes the proposed £100 Emergency Winter Fuel Payment Scheme it is a temporary measure and not a long-term solution to fuel poverty for older people which is so desperately needed in order to prevent hardship, excess winter deaths and illness associated with cold homes. We welcome the fact that the payments are automatic and there is no application process but we remain concerned about the short-term nature of the mitigation as a proposal to address the long-term problem of fuel poverty for pensioners.

As the consultation document outlines Pension Credit uptake statistics show that 72% of those families entitled to Pension Credit received with an estimated 26,300 (28%) potentially entitled to Pension Credit but not receiving it. The Women's Regional Consortium is extremely concerned about the number of people who are potentially missing out on this important help and who will therefore not be in receipt of a Winter Fuel Payment as a result of these changes.

The issue of under-claiming of Pension Credit has been around for many years with research showing that Pension Credit uptake has stagnated below 66% for the past 10 years.²² Despite efforts to encourage take-up the rates of unclaimed Pension Credit remain very high. The Women's Regional Consortium while supportive of efforts to encourage uptake of Pension Credit are sceptical whether this is going to be an effective mitigation to offset the negative impacts of the removal of the Winter Fuel Payment. We suggest that in order for it to be successful it would require a significant investment of time and resources.

²² Credit where it's due: A briefing on low uptake of Pension Credit, Independent Age, November 2022 https://www.independentage.org/sites/default/files/2022-11/Pension-Credit-briefing_Nov-2022_Independent-Age_0.pdf

The Department should consider the following from Independent Age²³:

- The data on who isn't receiving Pension Credit is sparse and the DWP has said that it knows very little about eligible non-recipients.
- In 2010 the DWP carried out detailed research into the barriers that prevent people from receiving Pension Credit, conducting a survey of people the DWP had identified as eligible non-recipients. Its findings concluded that the primary barrier was people assuming they are not, or are no longer, eligible – 65% of eligible non-recipients felt they had too much money to qualify.
- Polling commissioned by Independent Age suggests not much has changed: among respondents who said they would be unlikely to claim Pension Credit if they were struggling financially, 83% gave their reason for being unlikely to claim as 'I don't think I'd be eligible'.
- Other secondary barriers include perceived stigma from claiming. In the DWP research, a third of eligible non-recipients surveyed agreed they would 'feel bad' about claiming Pension Credit, and 16% agreed that their family or friends would have a negative view of them claiming Pension Credit.
- **Better data for targeting eligible non-recipients is crucial if uptake is to improve.**

We also point the Department to its own research on factors that enable or constrain take-up of Pension Credit.²⁴ This research showed a number of important points which are relevant to this consultation:

- The data analysis provides evidence that the estimated take-up rates tend to be lower in rural areas (65%) compared to urban areas (73%).
- There are a number of factors which may contribute to some pensioners not claiming their entitlement to Pension Credit:
 - unclear on the additional benefits of claiming Pension Credit.

²³ Ibid

²⁴ A Study on Factors that Enable or Constrain Take-Up of Pension Credit, Department for Communities & NISRA, December 2022
<https://niopa.qub.ac.uk/bitstream/NIOPA/15731/1/dfc-study-factors-that-enable-or-constrain-take-up-pension-credit-stage1.pdf>

- a general lack of awareness of the benefit.
- perceived stigma is a barrier to claiming and a question of whether a larger societal issue around Pension Credit was to blame.
- the application process was difficult in terms of the length and complexity of the forms and a lack of ability to complete online.
- The majority of Pension Credit claimants interviewed were helped to complete the form by family members or a community association/social worker.
- **Limited evidence is available on interventions that have improved take up of benefit entitlement amongst pensioners.**
- Interventions identified focus on addressing barriers to claiming and increasing the financial incentive to claim.

Once again, the Women's Regional Consortium would suggest that while increasing the uptake of Pension Credit is a worthy exercise in itself and something which the Department should continue to focus on it is not an effective enough mitigation to address the adverse impacts of the removal of the Winter Fuel Payment.

We also wish to stress the importance of independent advice in ensuring that people are able to access all the social security benefits they are rightfully entitled to. The provision of free, independent and impartial advice which is provided in trusted local spaces cannot be over-estimated particularly in reaching those who are the most marginalised. It is critically important that the independent advice sector is properly resourced for this work which can be time and resource intensive in order to reach those who are the most marginalised. The Department should continue to work in partnership with the Community and Voluntary sector who do so much valuable work in connecting those who are the most vulnerable and marginalised with the advice and support they need to address poverty and to claim their rightful entitlements.

4. Are there any other mitigations you would like to see implemented?

The Women's Regional Consortium would like to see the Winter Fuel Payment reinstated for all pensioners. The Consortium also supports the mitigations suggested by UNITE the Union:

- Subsidise home energy efficiency measures.

- Create a Fuel Poverty Mitigation Fund from windfall profits.
- Offer discounted energy tariffs for pensioners.
- Simplify the Pension Credit claim process.
- Raise the benefit threshold for pensioners.

5. Are there any other comments that you would like to make regarding this document or the consultation process?

Timeframe to respond to this Consultation

The final date for responses to this consultation is 2nd March 2025 (Sunday). While on the face of it, it looks like this gives respondents 12 weeks to respond to this consultation this is not the case. This consultation was published on the website on 9 December 2024 and ran over the Christmas holiday period. In effect, respondents had less than 12 weeks to respond and allowances must be made for holiday periods. In order to enable genuine and meaningful consultation the consultation timeframe should be at least 12 weeks.

As the Women's Regional Consortium we want to ensure that women from the most disadvantaged and rural areas of Northern Ireland are given the chance to share their valuable experiences and opinions to help influence and shape the actions of Government. A shorter consultation timeframe severely limits the opportunities to organise engagement with local groups to explain the contents of the consultation, facilitate discussion and meaningfully collect the views of those impacted by its contents. It means that organisations like ourselves have insufficient time to properly consult with affected women so that their views/experiences which are so critical remain outside the process. They should be given the time and space to discuss these issues in a format that they can understand and in ways where they feel comfortable and empowered to contribute.

This consultation was published alongside a number of other Government consultations which also require detailed responses by the Community and Voluntary sector. The volume of consultations continues to put huge pressure on an already overstretched and under-resourced sector who are facing significant

challenges due to funding cuts, insecure contracts and increased demand for our services.

We refer the Department to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.²⁵ 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.

6. Are you responding on behalf of an organisation? If so, which organisation?

- An individual
- On behalf of an organisation

Please comment:

Women's Regional Consortium, Northern Ireland

²⁵ 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