



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

9th April 2025

Dear Department of Health,

Due to pressure of time and workload we are unable to complete a full response to the Department's Draft Budget 2025-26 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 Consortium¹ 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

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)

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 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 note improvements in the Department's Budget EQIA from last year in terms of the consideration of available data. We particularly welcome the inclusion of the Gender Equality Strategy Expert Panel Report. However, it is a major omission that it does not refer to the remaining Social Inclusion Strategies listed below. We also remain disappointed that the consultation document fails to include valuable and relevant research and data from the community and voluntary sector which is relevant to this consultation including:
 - Women, Skills & Barriers to Work, Women's Regional Consortium, December 2024

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/12/Women-Skills-Barriers-to-Work-1.pdf>

- 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/Career-or-Care)
- 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's experiences of the Cost-of-Living Crisis in Northern Ireland: Mental Health (Summary report), June 2023
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/09/Mental-Health-Summary-from-Women-Cost-of-Living-Research.pdf>
- Health Inequalities in Northern Ireland: The Impact of the Cost of Living Crisis on Women's Health, WRDA, February 2024
<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/670e4ec37296d232ca200688/1728990916910/Key-Research-Findings.pdf>
- 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 wish to specifically highlight our concern about the omission of the Anti-Poverty Strategy Expert Advisory Panel report given the disproportionate impact of poverty on women with resulting health impacts. As we have outlined in our own research (listed above) women act as the 'shock absorbers' of poverty in their homes going without food, heat and clothing when money is tight to protect their children and other family members. Our research found many examples of women missing meals, living in cold homes and being unable to afford to take part in social activities all of which has impacts on both their physical and mental health. Living in poverty and the ongoing impacts of the Cost-of-Living Crisis have meant that many women are being forced to buy cheaper, processed food and are having increasing difficulty affording healthier foods such as fruit and vegetables. This will have both short and long-term health impacts for these women and their families. Our research on the impact

of the Cost-of-Living Crisis on Women in Northern Ireland³ specifically found that:

- 89% of the women said that their food bills were having the biggest impact on their household budget.
 - 90% felt that the Cost-of-Living Crisis had impacted on their physical or mental health or both.
 - 92% reported that cost of living increases had negatively impacted on their ability to take part in social activities.
 - 78% said they felt cold or hungry or both as a result of cost of living increases.
- We agree with our Women's Policy Group colleagues about the overall lack of detail in the EQIA with regards to how prioritisation was carried out and that more clarity is needed in this area. By way of example on page 36 the document makes the following statement: *"In general men suffer for worse health outcomes than women, however there are some issues that affect women specifically."* This statement adds nothing to our understanding of the sources used or what the issues are despite evidence highlighting the disproportionate health impacts on women (see consideration of data list above).
- We also agree with WPG colleagues that the tables in the document are unclear, miss impacts and generally do not explain how decisions have been made. We provide a number of examples as follows:
 - Page 32 – against *"Reduction in payments for support services provided by the Community and Voluntary Sector"* fails to include gender despite the fact that women are more likely to work in the Community and Voluntary Sector and are more likely to have to make up for cuts to services through unpaid care work.
 - Page 37 – against *"Children's Social Care Reform and Adult Social Care Reform"* both fail to include gender despite the fact that women are more likely to provide care both for children and other family members and will be more impacted by a lack of funding to support reform.
- **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).⁴ In addition, most staff within the Community and Voluntary sector are women, with women comprising almost three quarters of paid employees.⁵
- **A restriction in waiting list activity.** Northern Ireland has some of the worst waiting lists in the UK with a quarter of the population on a hospital waiting list

³ 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)

⁴ <https://www.niassembly.gov.uk/globalassets/documents/raise/publications/2022-2027/2024/economy/0824.pdf>

⁵ [Workforce | NICVA](#)

and half of patients waiting over a year for treatment.⁶ 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.

- **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.⁷ The EQIA fails to recognise these disproportionate impacts on women.
- **Reduction of 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.
- **A reduction in staffing.** 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.
- **Reduction of Hospital Beds.** 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.
- We are pleased to see that a **Rural Needs Assessment** has been attempted however 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).⁸ 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.

⁶ <https://www.economist.com/britain/2024/05/30/half-of-northern-irish-patients-wait-over-a-year-for-treatment>

⁷ [Northern Ireland Health and Social Care Workforce Census March 2024 \(health-ni.gov.uk\)](https://health-ni.gov.uk/northern-ireland-health-and-social-care-workforce-census-march-2024)

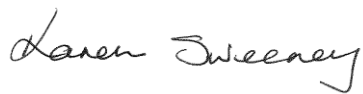
⁸ Mid-Year Population Estimates – Urban/Rural Change, NISRA
<https://www.daera-ni.gov.uk/publications/mid-year-estimates-population-change>

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

A handwritten signature in black ink that reads "Karen Sweeney". The script is cursive and fluid, with the first name "Karen" and the last name "Sweeney" clearly distinguishable.

Karen Sweeney
Director, WSN