



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

**Response to: Consultation on Department for Communities Budget 2025-26 allocations**

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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 2025-26 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/2025-05/dfc-budget-2025-26-draft-eqia.pdf>

**1.6** We remain extremely concerned about the challenging budgetary position faced by the Department. Operating under a challenging budget position will undoubtedly have impacts 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 and we support the following statement from the Women's Policy Group (WPG) in relation to this EQIA:

*“While we are engaging with this EQIA, and indeed engaged with the 2024-25 Budget EQIA, out of hope that we may influence in-year monitoring rounds and/or future EQIAs, please do not construe our engagement as endorsement of the Department's process in relation to Section 75 and budget formation this year. We are gravely concerned that the Department may be, in large part, copying the processes that they carried out just a few months ago across to this document without changing anything and without properly engaging with the guidance from the Equality Commission about the EQIA process.*

*We raise this point to make it clear that going forward, we expect the Department to properly equality screen, carry out an EQIA and then publicly consult on the draft budget. We also expect that the final EQIA will reflect the Department's actions to mitigate adverse impacts in line with ECNI guidance.”*

**1.7** We wish to endorse the response made by the WPG of which the Women's Regional Consortium is a member. We also wish to endorse the response made by our colleagues in Housing Rights.

## 2.0 General Comments

The consultation document acknowledges that: “*the Department’s 2025-26 Budget position is challenging*”. There is no doubt that with cuts being faced across Departments, cumulative cuts within many Departments, single year budgets, continuing inflationary pressures, 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 allocation of budgets.

### 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.

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

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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)

<sup>4</sup> General Recommendations Adopted by the Committee on the Elimination of Discrimination against Women, Thirtieth session (2004), General Recommendation No 25

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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 adequate 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 conditionality for parents and incentives for second earners as well as using a traditionally gendered 'male breadwinner' model.

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[https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1\\_Global/INT\\_CEDAW\\_GEC\\_3733\\_E.pdf](https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1_Global/INT_CEDAW_GEC_3733_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/>

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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>

***“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.”***

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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/>

*(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>

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

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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  
[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



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 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 recommended that the UK government *"undertake a comprehensive assessment on the impact of*

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[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)  
[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)

*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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<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)

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 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>

- 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 26.9% compared to the UK rate of 21.3% and is the second highest of the twelve UK regions.<sup>29</sup> The female economic inactivity rate has also been consistently higher than the male economic inactivity rate – the most recent figures show the male rate is 22.3% and the female rate is higher at 31.4%.<sup>30</sup>

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<sup>29</sup> Northern Ireland Labour Market Report, NISRA, June 2025

<https://datavis.nisra.gov.uk/economy-and-labour-market/labour-market-report-june-2025.html>

<sup>30</sup> Ibid



In looking at the detail of economic inactivity it shows that around a quarter of women who were unavailable for work gave the reason for inactivity as family/home care (49,000 or 26.2%) and this was the least likely reason for male inactivity (at 7,000 or 5.7%). 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>31</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>32</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 due to the cost of childcare.

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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>31</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>32</sup> Northern Ireland Childcare Survey 2023, Employers For Childcare, December 2023  
<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2023/>

- 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>33</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>34</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>35</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>33</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>34</sup> Northern Ireland Childcare Survey 2023, Employers For Childcare, December 2023

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

<sup>35</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/)

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*progress in the workplace.”*<sup>36</sup> The Committee recommended that Government should ensure the availability of affordable and accessible childcare particularly in Northern Ireland.<sup>37</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>36</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>37</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 contribute to their communities thereby tackling disadvantage. As such the impact of the WCCF funding strongly aligns with government policy to tackle disadvantage and poverty in all its forms. It also aligns with one of the 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>38</sup>

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<sup>38</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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Whilst DfC has no policy responsibility to provide 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>39</sup>*

Despite the importance of this funding 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 few years the Department has been able to increase this funding slightly to meet increasing wage bills and the cost of living increases. We welcome the additional funding allocation of £2.8 million for 25/26 which will help community organisations meet the increases in Employer National Insurance Contributions (NIC), the minimum and living wage and persistently high running costs.

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 tackling poverty 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 the WCCF model on a ring-fenced, protected basis given the Fund's positive evaluation<sup>40</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)*

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<sup>39</sup> <https://www.communities-ni.gov.uk/about-department-communities>

<sup>40</sup> Evaluation of Regional Support Arrangements for the Voluntary and Community Sector, Final Report, June 2015, DSD and DARD

### **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 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 childcare, transport, 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. The fourteen Women's Centres receive funding under the Community Investment Fund (CIF) and/or Neighbourhood Renewal (People and Places) to support longer term community development via funding to support some of the key essential staff and some overhead costs. However, from 2012 to 2022 these funds have been subject to austerity cuts which 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, work-based pension schemes introduced with contributions gradually rising, a cost-of-living crisis and now the increase in National Insurance, all of which have substantially increased the gap between what was originally funded and what can actually be covered now. There were small percentage increases and payments towards increased running costs over the last three years but these increases still did not align with inflation-impacted actual costs.

We welcome the additional investment of £2.8 million across the community and voluntary sector, however we are concerned that this will only go a small way in meeting the needs of some organisations in terms of the substantial increase in Employer NICs and the increase in both minimum and living wage as well as persistently high running costs. For example, Women's Centres often employ part-time/job share posts, the majority of which would have fallen below the £9,400 threshold of when an employer would have had to start paying Employer NICs. With the threshold now lowered to £5,000, contributions are required to be paid for all staff at the increased rate of 15%. These are now additional costs that didn't exist before and were not budgeted for but which now must be met.

The Women's Regional Consortium is funded by the DfC in partnership with DAERA through the Regional Infrastructure 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 24 consultations, published a research paper on the Barriers to Work that women face and have brought the lived experience of local women and their views to 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 International Human Rights Obligations**

In the context of the draft EQIA, it is essential to note that Northern Ireland is bound by the international human rights obligations of the UK, as State Party to all key Human Rights Conventions, including the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). Progressive realisation of rights is a key principle of the international human rights framework, in recognition that implementation is affected by many factors including resourcing. However, this incorporates a complementary principle that existing rights cannot be rolled back or weakened. This is central in the context of budget cuts, as it is vital to ensure that, in particular, people with protected characteristics are not disadvantaged and to put in place relevant mitigating action. Recommendations to the UK from UN human rights frameworks set out a clear roadmap for this.

The full set of recommendations for Northern Ireland and the UK from UN monitoring bodies is extensive, ranging from over 300 recommendations from the Universal Periodic Review in 2022 to the report from the follow up to the Inquiry of the Rights of Disabled People under the UN Convention on the Rights of People with Disabilities, issued in April 2024. With regard to women and gender equality, it is relevant to note that the most recent Concluding Observations for the UK express concern that protections for women in Northern Ireland are falling behind those of women elsewhere in the UK and a key recommendation is ‘to put protections in Northern Ireland on an equal footing with those in England, Scotland and Wales’.

The likely impact of proposed cuts, across Departments, is to reduce the realisation of rights set out in CEDAW, in particular in relation to women’s economic independence and safety from violence. This will further widen the gap between Northern Ireland and other devolved administrations in the UK, serving to deepen the disadvantage of women and girls in Northern Ireland. Therefore, it is urgent and vital

to undertake the fullest possible analysis of how proposed cuts will impact on women and girls, and identify key mitigations wherever possible. Cuts now are likely to create long term negative consequences, with associated public costs, and it is essential that this is clearly understood in decision making, in particular if ‘invest to save’ mechanisms are outside possible options.

### *2.9.1 Section 28E of the Northern Ireland Act 1998*

We agree with our colleagues in the Women’s Policy Group who have highlighted that the Department has a statutory duty to target resources on the basis of objective need under Section 28E of the Northern Ireland Act 1998. Justice Treacy’s High Court judgement concluded that there is a statutory provision to allocate resources on the basis of objective need. Given the disproportionate impact of the proposed decisions on women, children and disabled people, who are recognised as most at risk of poverty and deprivation, the proposals in this draft Budget do not meet the statutory requirements of Section 28E.

## **2.10 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. Women 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>41</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 within this current budget cycle, but the benefits would help to improve the overall 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 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

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<sup>41</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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OECD<sup>42</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.

A Gender Budget Statement is just one of a suite of tools that can be employed with the implementation of gender budgeting. Published alongside the annual budget, the statement is an opportunity for the Department to highlight where resources were allocated to promote gender and wider equality, as well as noting equality gaps and addressing impacts. Using gender as the foundation for this equality analysis is key, as it helps to facilitate an intersectional approach to analysis as opposed to viewing each equality ground in a silo.

In Victoria, a state in south eastern Australia, an annual [Gender Equality Budget Statement](#) is published alongside the budget. It provides an overall snapshot of how they allocated spend to promote gender equality and then breaks down the spend, giving the context of the issue, what they are spending and why they are spending the funds in that way. In the 2024-25 Statement<sup>43</sup> the following was highlighted:

- More than 130 Budget initiatives were assessed as having a positive impact on gender equality. Nine initiatives were identified as having a significantly positive impact, with a total investment of \$352 million.
- \$657 million for services including addressing the 'pain gap' in women's health.
- \$1.8 billion to increase women's economic security by supporting workers in women-dominated sectors and helping women to reskill and retrain.

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<sup>42</sup> OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

<sup>43</sup> Victoria State Government (2024). *Helping Families: Gender Equality Budget Statement*. <https://s3.ap-southeast-2.amazonaws.com/budgetfiles202425.budget.vic.gov.au/2024-25+State+Budget+-+Gender+Equality+Budget+Statement.pdf>

- \$292 million to assist with cost of living pressures that disproportionately affect women.
- \$216 million to support Victorians experiencing homelessness into housing, including women.
- \$269 million to prevent family violence and support women's safety.

Acknowledging the issues at hand and demonstrating how resources will be used to mitigate/eradicate inequalities is not only useful for the Department, it also brings greater transparency to the budgeting process, with clearer links to where public money goes and the positive impact it can have on society.

### 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 groups that have not been identified in Section 6 of the EQIA consultation document?**

☒ Yes

☐ No

**If so, what are they?**

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>44</sup> This lack of data in relation to gender makes it difficult to fully assess and address objective need. Without access to up-to-date data disaggregated by gender and indeed across all the Section 75 groups analysis of impact and intersectionality issues is made more difficult. Having access to this data is also vital in determining where actions should be directed to effectively address inequalities.

There are a range of data gaps where it would be useful to have Section 75 statistics published regularly to enable analysis and to address gendered and other Section 75 impacts:

- Discretionary Support claimants and awards
- Contingency Fund (New Claims Grant) claimants and awards
- Benefit Cap and Bedroom Tax Mitigations payments
- Universal Credit 5-week wait:
  - Section 75 statistics on those waiting longer than 5 weeks
  - Section 75 statistics on claimants and awards of Advance Payments

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<sup>44</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>

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- Section 75 statistics on those having difficulties repaying Advance Payments.
- Universal Credit additional elements in payment by Section 75 group particularly in relation to housing, care and disability.

We continue to note that there is no Wealth and Assets survey in Northern Ireland which provides information on the distribution of wealth according to gender. There have also been delays with Universal Credit statistics with the latest available figures for February 2025.

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 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:

- Women, Skills and 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](https://www.womensregionalconsortiumni.org.uk/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf)  
 [\(womensregionalconsortiumni.org.uk\)](https://www.womensregionalconsortiumni.org.uk)
- Women living with Debt, Women's Regional Consortium, September 2022  
[Women-Living-with-Debt-1.pdf](https://www.womensregionalconsortiumni.org.uk/Women-Living-with-Debt-1.pdf) (womensregionalconsortiumni.org.uk)
- 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 |](https://www.communities-ni.gov.uk/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 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 the Section 75 equality groups that have not been identified in Section 7 of the EQIA consultation document?**

☒ Yes

☐ No

**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, the Voluntary and Community Sector, 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 budgets.

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. Benefit Delivery**

We disagree with the potential impacts identified in this section. The Department states that no adverse impact is expected on a range of Section 75 groups including on gender. The table fails to include any relevant statistics in this section. We believe that at the very least this should include statistics on Universal Credit claimants and ideally relevant statistics across the full range of social security benefits to determine impacts.

We include the statistics in relation to Universal Credit and Carer's Allowance by way of illustration of the gendered impacts of any failure to have sufficient staffing levels in place:

- The latest available Universal Credit statistics (February 2025) show that women are more likely to claim Universal Credit - 61% (134,210) claimants were female compared to 39% male (84,730).<sup>45</sup>
- The latest available Carer's Allowance statistics (February 2025) show that 65% of Carer's Allowance claimants are women and 35% are men. Of Carer's Allowance recipients 70% are women and 30% are men.<sup>46</sup>

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<sup>45</sup> <https://www.communities-ni.gov.uk/publications/universal-credit-statistics-february-2025>

<sup>46</sup> <https://www.communities-ni.gov.uk/publications/benefits-statistics-summary-publication-accredited-official-statistics-february-2025>

The consultation document states that the caseload for Universal Credit remains high and this has left the Department operating with insufficient staffing levels which are impacting on operational delivery areas. The consultation goes on to say that *“failure to have sufficient staffing levels in place would pose a risk of delay in benefit payments, including completion of the Move to Universal Credit, would impact on telephony and service delivery performance, and would place working age customers in financial hardship.”*

While we welcome the Executive’s allocation of an additional £16.9m Earmarked Resource funding for welfare benefit delivery in 2025- 26 we stress the need for recurrent funding to appropriately resource benefit delivery.

Recurrent funding is critical as social security benefits have a vital role to play in easing the impact of poverty. Research continues to show that many social security benefit claimants are struggling to make ends meet. JRF research found that 86% of low-income households on Universal Credit went without essentials and that around 9 in 10 low-income households receiving the Limited Capability for Work element (90%) and Limited Capability for Work and Work-Related Activity element (88%) were going without essentials in October 2024. Families on Universal Credit are almost twice as likely to be going without 4 or more essentials than families not on any benefits in (45% compared to 24%).<sup>47</sup>

More people in Northern Ireland have to rely on social security for their income<sup>48</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>49</sup> This is an argument for increased investment in the delivery of these benefits in Northern Ireland.

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<sup>47</sup> <https://www.jrf.org.uk/cost-of-living/jrfs-cost-of-living-tracker-winter-2024>

<sup>48</sup> <https://www.consumercouncil.org.uk/research/q4-2024-northern-ireland-household-expenditure-tracker>

<sup>49</sup> <https://www.jrf.org.uk/report/poverty-northern-ireland-2022>

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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).

***“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)*

Budget cuts leading to inadequate staffing and the potential for delays in benefit payments/child maintenance payments will have serious impacts for many Section 75 groups. 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 insufficient 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).

### *Move 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 refer the Department to Advice NI’s report ‘The Move to Universal Credit: Get Ready’.<sup>50</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

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<sup>50</sup> The Move to Universal Credit: Get Ready, Advice NI, May 2023  
<https://www.adviceni.net/policy/publications/move-universal-credit-get-ready>

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.

### *Universal Credit*

Research by the Women's Regional Consortium on the Impact of Universal Credit on Women<sup>51</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

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<sup>51</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>

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>52</sup> While the consultation document states that funding has been provided in full for the existing welfare mitigations it 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.

***“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

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<sup>52</sup> Cliff Edge Coalition, Member Briefing, May 2023  
<https://www.lawcentreni.org/wp-content/uploads/2023/04/CEC-Full-Member-Briefing-May-2023-.pdf>

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.

## **ii. Voluntary & Community Sector**

We welcome the recognition by the Minister in the consultation document of 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 also welcome the acknowledgment of the pressures the sector is under and that given these pressures the Department will increase Voluntary and Community Sector funding by £2.8m on the Department's 2024-25 Final EQIA Budget position funding level. However, the consultation document does not provide any detail of how this funding will be allocated to determine impacts.

While this additional funding is welcome it is simply not enough to address the long-term issues that the Community and Voluntary sector are facing. A report by NICVA has found that 49% of organisations in the sector report recruitment difficulties due to uncompetitive salaries compared to other sectors, short-term funding, and staff burnout driven by increased service demand, the sector is facing rising pressures all amid the ongoing cost-of-living crisis.<sup>53</sup>

The consultation document acknowledges that the sector accounts for a bigger share of the active workforce in Northern Ireland than at UK level (7% in NI compared to 3% at UK level) and that women account for a greater share of the

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<sup>53</sup> Making a difference, Reflections from the challenges facing the Voluntary and Community Sector workforce, NICVA, July 2024  
<https://www.nicva.org/sites/default/files/2025-01/Workforce%20Report%20July%202024%20FINAL.pdf>

workforce of the sector compared to the overall NI workforce. Gender data on employees working within the Community and Voluntary sector should therefore be included in the analysis of impact table. Women are more likely to be disadvantaged by inadequate funding of the Community and Voluntary sector and while additional funding has been provided it is insufficient to address the resourcing needs of the sector meaning that women are more likely to be impacted.

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.

#### **iv. Supporting People Programme and Homelessness**

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 proposal by the Minister to provide an additional £3.7m above the 2024-25 Budget to help bring forward new and extended services which align to the 3 year Supporting People Strategy and aim to prevent homelessness.

We support the following comment and recommendation from our colleagues in Housing Rights about strategic prevention initiatives:

*“While Housing Rights welcomes the suggestion as outlined in the EQIA that strategic prevention initiatives should support innovation and delivery through partners, including the community and voluntary sector, we would highlight that this type of partnership requires long term planning and support for the pressures facing community and voluntary partners with increases in minimum wage and employer National Insurance contributions. Given the strategic reliance on community and voluntary sector partners for delivery of innovative prevention services, it is imperative that the Department and other statutory partners including the NIHE, consider a vision for partnership which is long term, adequately resourced and rooted in respect.*

***To provide for at least some long-term stability which would create the space for planning and resource allocation, Housing Rights would urge the***

***Department to make the Homeless Prevention allocation a multi-annual, ring-fenced allocation.”***

### *Women, Housing and Homelessness*

Women are particularly vulnerable to issues around housing availability and affordability because women have lower incomes and lower levels of wealth than men making it more difficult for them to secure adequate housing on their own. Women’s ability to afford their own home or to rent privately is determined by their access to paid employment and to social security benefits. As previously stated women are more likely to be in low-paid, part-time and insecure work as well as being more likely to claim social security benefits. 59% of Housing Benefit claimants are women<sup>54</sup> reflecting women’s lower incomes. Once again, these are older statistics obtained through a request to DfC by Women’s Support Network. This is yet another example of a data gap and we suggest that these statistics should be routinely published as part of the benefit statistics publications.

As the Women’s Budget Group states housing is a feminist issue: *“Women are doubly impacted by the housing crisis as a result of their disadvantaged economic position and their disproportionate responsibility for care work.”*<sup>55</sup>

Since 2010 there has been a reduction in overall government spending through welfare reform and austerity measures, reductions in housing benefit rates and eligibility and changes to the size and status of the social housing sector. All these changes have eroded the housing safety net provided by the social security system which will have greater impacts for low-income women who are more likely to claim social security benefits.

Safety is a key issue for women in relation to housing. Domestic abuse and other forms of violence against women are a key cause of homelessness for women and children. A lack of suitable, affordable homes means that women suffering from

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<sup>54</sup> Information provided in an email to Women’s Support Network from the DfC in November 2020

<sup>55</sup> A home of her own, Housing and Women, Women’s Budget Group, July 2019  
<https://wbg.org.uk/wp-content/uploads/2019/07/WBG19-Housing-Report-full-digital.pdf>



domestic abuse are forced into the impossible choice of staying with their abuser or making them and their children homeless.

Figures from Women's Aid in Northern Ireland show that in the financial year 2023/24, **527 women** and **291 children** stayed in one of their emergency accommodation refuges throughout Northern Ireland.<sup>56</sup> These specialised and secure refuges are key to ensuring that victims, particularly women, have somewhere to turn when trying to escape abuse. It is essential that these services receive secure funding which keeps pace with increases in the cost of living so that they can properly support women through the provision of refuge accommodation.

Access to housing, secure tenancies and the appropriate funding of refuges must be compliant with the Istanbul Convention. Article 20 of the Convention<sup>57</sup> states: *"Parties shall take the necessary legislative or other measures 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."* In addition, an explanatory report to the Convention recommends: *"safe accommodation in specialised women's shelters, available in every region, with one family place per 10 000 head of population."*<sup>58</sup>

It is clear that the ability of survivors of domestic abuse to rebuild their lives can be severely limited by a lack of suitable housing at the same time as refuge services are under-funded. It is also important that the housing available to survivors is appropriate for their particular needs including the needs of disabled women and children.

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<sup>56</sup> <https://www.womensaidni.org/resources/regionalstatistics2324/>

<sup>57</sup> Council of Europe Convention on preventing and combating violence against women and domestic violence, April 2011  
[Council of Europe Convention on preventing and combating violence against women and domestic violence \(coe.int\)](https://conventions.coe.int/Treaty/Html/108.htm)

<sup>58</sup> Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence  
[CETS 210 - Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence \(coe.int\)](https://conventions.coe.int/Treaty/Html/108.htm)

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We note with alarm the shortfall statistics for housing support detailed in the consultation document and that out of the groups listed this is the group with the highest percentage shortfall: *“Women who are at risk of domestic violence (service shortfall of 49% or c.650 units.)”* This is hugely concerning and we call for more funding to provide housing support in this area given the extent of the problem of violence against women and girls in Northern Ireland and our unenviable title of being one of the most dangerous places in Western Europe to be a woman.

We support the following statement from our colleagues in the WPG:

*“We have reservations about the conclusions the department has reached about this area. There is an absurdly high shortfall of units for DA survivors which is particularly stark given the Minister’s announcement earlier this year regarding the points allocation, whereby the department indicated its intention to ensure that survivors were not disadvantaged in the housing points system. The Minister said that **“Applicants who have experienced violence or abuse, or who are at risk of violence or abuse, whatever the motivation or perpetrator, will continue to be assessed and provided with emergency assistance under the homelessness legislation.”** The inclusion of domestic abuse survivors is very welcome, but this statement is meaningless when there is such a shockingly large shortfall in provision. Further, since the Minister’s own statement on announcing the change acknowledged that this is a gendered phenomenon, the department must also recognise that there are disproportionate negative impacts on women as compared to men as a result of this shortfall.”*

## **v. Employment Support**

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.

In December 2024 the Women's Regional Consortium published research into Women, Skills and Barriers to Work.<sup>59</sup> This research highlighted the range of issues impacting on women's ability to access education, training and skills and their ability to work.

Over half of the women surveyed by the Consortium about the barriers to work they faced said it was due to childcare related issues - 45% said they were out of work because they're looking after children and 17% said the cost and availability of childcare was the main barrier for them. Other barriers that emerged that prevented women from getting the jobs they really wanted to do were:

- 43% reported sickness/ill health/disability;
- 38% said they needed education/training/skills;
- 30% reported a lack of confidence;
- 30% said a lack of flexible working opportunities;
- 25% said there weren't enough suitable jobs;
- 22% reported unpaid care responsibilities;
- 20% said a fear of coming off benefits and being worse off in low-paid work;
- 20% reported the cost/availability of transport.

***"It started off with childcare, then illness and then the kids have additional needs. My biggest barrier now is my own confidence after getting out of a domestic violence situation."***

***"If you've no childcare you can't do nothing, you can't train, you can't go to work if you've no one to mind your kids."***

***"It's a confidence thing. I've been out of work for 5 years since my son was born."***

***"Sometimes you're better off on benefits than in low paid work and you get help with your rent."***

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<sup>59</sup> Women, Skills and 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>

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***“There’s no money for training in areas of community work, youth work or care work, the things I’d be interested in.”***

***“All the training is aimed at different skills but not enough for building confidence or self-esteem. That’s really important for people who have been out of work for so long.”***

***“Government need to take a more individual approach to everybody’s employability.”***

*(Quotes taken from Women’s Regional Consortium Research on Women, Skills & Barriers to Work, December 2024)*

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 therefore particularly important for women and investment is needed in this area to address the considerable barriers that women face.

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 31.4% compared to 22.3% for men.<sup>60</sup> Around a quarter of women who were unavailable for work gave the reason for inactivity as family/home care (49,000 or 26.2%) and this was the least likely reason for male inactivity (at 7,000 or 5.7%). 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>60</sup> Northern Ireland Labour Market Report, NISRA, June 2025  
<https://datavis.nisra.gov.uk/economy-and-labour-market/labour-market-report-june-2025.html>

We are surprised that these statistics on economic inactivity have not been included in the assessment of impacts table in this section. These are very relevant statistics in relation to the need for employment support and should have been provided here.

We also refer the Department to the Women's Regional Consortium response to the Pathways to Work Green Paper<sup>61</sup> which outlines our strenuous objections to the proposals to cut disability benefits. We believe that the proposals contained in the Pathways to Work Green Paper will have even greater impacts in Northern Ireland due to higher rates of disability, a higher proportion of people claiming disability benefits, higher levels of benefit dependency in Northern Ireland, worse levels of mental ill health and a consistently higher disability employment gap in Northern Ireland compared to the rest of the UK. The Women's Regional Consortium is also concerned about the gendered impacts of the proposals contained in the Green Paper because women are more likely to claim social security benefits, are more likely to be providing unpaid care and are more likely to be economically inactive. This means that women are more likely to be adversely impacted by the Green Paper proposals than men.

Instead, the Women's Regional Consortium believe that what is needed is investment in the social security system to ensure that it provides the safety net of support that disabled people can rely on and in the long term reduces the pressure on other services, including the health service, which is so impacted by inadequacies in social security support for disabled people.

## **vi. Discretionary Support**

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

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<sup>61</sup> Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper, Women's Regional Consortium, June 2025  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2025/06/Womens-Regional-Consortium-Response-to-Pathways-to-Work-Green-Paper.pdf>

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>62</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.

We welcome the fact that the EQIA document acknowledges the *“continued financial pressures faced by many people”* and that the Minister will maintain the Discretionary Support Grant Budget at £25.5m for 2025-26. The Department has rightly highlighted in the consultation document that *“with rising poverty levels, failure to sustain Discretionary Support would impact most on those already disproportionately impacted, including low-income families, disabled people, older people, women and children.”*

However, we suggest that even with maintaining the increase in the baseline figure this will be insufficient to meet rising demand for this important source of help for those who are the most vulnerable and marginalised. This is likely to adversely impact on the groups identified by the Department above.

The consultation states that 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>63</sup> We

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<sup>62</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>

<sup>63</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>

therefore find it difficult to understand how restrictions in the levels of funding provided for Discretionary Support will not have an adverse effect on lone parents and women. The Department should include statistics on Discretionary Support grants and loans by Section 75 groups to allow for assessment of impacts

We support the following concerns raised by our colleagues in Housing Rights in relation to Discretionary Support grants eligibility:

*“The Consultation Report following the policy change in 2023 stated that the Department’s statistical analysis indicated a decline in grant decisions, a decline in the average grant amount awarded, an increase in nil awards, and an increase in both loan awards made and the loan amounts awarded.”<sup>64</sup>*

*Indeed, following the policy changes, the subsequent Departmental allocations in the 2024/25 Budget forecast a 30% reduction in Discretionary Support grant spend over the financial year.<sup>65</sup> It is clear, then, that the Department’s goals have been achieved, and access to grants has been successfully limited.*

*The policy changes in question were to ‘restrict grant awards to basic needs only except in “setting up” and disaster situations’ and to ‘extend the repeat item exclusion period.’<sup>66</sup>*

*It is concerning, then, that the Minister, in his statement to the Assembly on 2<sup>nd</sup> June 2025, said, ‘I intend to maintain the Discretionary Support Grant Budget but will be introducing reforms to protect this money from fraud and protect those who really need it.’ While fully supporting the idea that Discretionary Support should go to those who really need it, Housing Rights is concerned that reforms could lead to further narrowing of an already recently narrowed eligibility to apply for a grant, thereby depriving people who really need it of the opportunity to avail of one.*

*Housing Rights would be concerned about the impact of any further restrictions or narrowing of the eligibility for access to Discretionary Support, as this may have the double impact of making people who are in need ineligible, as well as costing the Department elsewhere in homelessness spend. Housing Rights recommends that a full Equality Impact Assessment of any proposed reforms is carried out before implementation.”*

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<sup>64</sup> [Changes to the Discretionary Support Scheme Consultation Report](#)

<sup>65</sup> [Budget 2024-25](#)

<sup>66</sup> [Changes to the Discretionary Support Scheme](#)

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>67</sup> show that 77,000 emergency food parcels were distributed in 2024/25. The longer-term trend is stark. The number of parcels distributed in 2024/25 is significantly higher (71%) than the same period five years ago (2019/20) and more than four times the amount distributed then years ago in 2014/15. 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>68</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 feeding themselves and their families and heating their homes. Often they are faced

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<sup>67</sup> Emergency food parcel distribution in Northern Ireland: April 2024 – March 2025, Trussell Trust [https://cms.trussell.org.uk/sites/default/files/2025-05/EYS\\_factsheet\\_NI\\_2025.pdf](https://cms.trussell.org.uk/sites/default/files/2025-05/EYS_factsheet_NI_2025.pdf)

<sup>68</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/>



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.

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

This year has seen yet more media coverage on Northern Ireland's failure to meet the target for building new social homes.<sup>69</sup> The budget provided by Stormont will only fund work on around 1,000 new social homes this year which falls short of the Northern Ireland Executive's target. On the basis of the current budget the number of homes started this year will be lower than the 1,504 started last year

The number of households in priority need of social housing in Northern Ireland is at the highest level on record. In March 2024 there were 47,312 applicants on the social housing waiting list and of these 35,464 were in 'housing stress'.<sup>70</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>71</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>69</sup> <https://www.bbc.co.uk/news/articles/cjrnqpp13glo>

<sup>70</sup> <https://datavis.nisra.gov.uk/communities/northern-ireland-housing-statistics-2023-24.html>

<sup>71</sup> Housing and Gender, Women's Budget Group, March 2020  
[final-housing-2020.pdf \(wbg.org.uk\)](https://www.wbg.org.uk/final-housing-2020.pdf)

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 and support the following statement from our colleagues in Housing Rights:

*“Housing Rights is disappointed that housing new build targets will be missed by a significant margin, and would urge the Department and the Minister to prioritise bids for additional funding to close the shortfall between new-builds started and the housing targets as outlined in the Housing Supply Strategy and the Programme for Government during 2025-26’s in year monitoring rounds.”*

Statistics for Northern Ireland show that more women are private rented sector tenants compared to men.<sup>72</sup> We have been unable to find more up to date statistics on the gender breakdown of private renters in Northern Ireland and suggest that this is another data gap where it would be useful to have regular, up-to-date statistics for Northern Ireland. We share Housing Rights concerns about private rented tenants and support the recommendations they have made in response to this consultation:

*“The absence of a specific budget allocation towards practical measures to assist private tenants will impact across section 75 groups.....The private rented sector is on an extremely worrying trajectory and is increasingly relied upon to meet housing need. Households experiencing inequality living in the sector have faced increased rents, reducing supply and amongst the lowest levels of legal protections in the UK.*

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<sup>72</sup> NIHE House Condition Survey 2016

<https://www.nihe.gov.uk/Working-With-Us/Research/House-Condition-Survey>

*This is evidenced in Housing Rights work, with private renters routinely disproportionately represented amongst the households requiring our assistance.<sup>73</sup>*

*The impact of the continued underfunding of the supply of new social homes and the use of private rented stock to meet the (increasing) temporary accommodation demand intensifies supply issues at the cheapest end of the private rented sector. This leads to increasing private rented sector rents, increased competition for stock and worsens the housing opportunity available to low-income households.*

***Housing Rights would encourage the Department to consider making a specific budgetary allocation to low-income private renters affected by the affordability challenges in the sector. We note that the recommendations of the independent Welfare Review panel included a costed proposal to introduce a Financial Inclusion Service<sup>74</sup> and we recommend further consideration of this proposal as part of future measures to prevent homelessness.”***

***“To tackle acute affordability issues in the Private Rented Sector, Housing Rights also recommends that a fund be set aside within a strengthened mitigation package for a specialist comprehensive Financial Inclusion Service to support low-income private renters impacted by LHA cuts to address the totality of affordability issues they face. This service would also include access to a grant to meet pressing need not met by existing support. It is anticipated that not only would the grant element help to mitigate the impact of LHA cuts but it would encourage both tenants and landlords to engage with the financial inclusion service.”***

## **Affordable Warmth**

The Affordable Warmth Scheme is an important Scheme, targeted at low-income households and addressing fuel poverty and energy inefficiency. 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>

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<sup>73</sup> Despite accounting for approximately 17% of households in the last census, private renters routinely make up over 33% of the contacts to Housing Rights housing advice helpline.

<sup>74</sup> [Welfare Mitigations Review](#)

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

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

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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>

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)*

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<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/>

<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/>

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 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 be used in determining the likely impacts on women of changes to the funding for the Affordable Warmth Scheme.

**3. Please state what action you think could be taken to reduce or eliminate any adverse impacts in allocation of the Department's 2025-26 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>82</sup> states: *"[Equality] Screening should consider equality impacts, mitigation measures and/or opportunities to further promote equality of opportunity. The higher the level of*

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

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

<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.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)

*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 mitigating measures and alternative policies is at the heart of the EQIA process. Equality Commission for NI (ECNI) guidance<sup>83</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.

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<sup>83</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) (page 30)

Indeed, we raised this issue in responding to the Department's 2024-2025 Budget EQIA and yet there are the same issues are being repeated in the 2025-2026 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 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>84</sup>

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.

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

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<sup>84</sup> <https://www.nerinstitute.net/blog/northern-irelands-budget-and-navigating-northern-irelands-fiscal-challenges>



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>85</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>86</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.

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

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<sup>85</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>86</sup> Ibid

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. Moving forward, to support development of the Executive's comprehensive 5-year budget sustainability plans, the Department has commenced development of its own 5-year Departmental Plan. Please provide your views on how the Department should shape future service delivery, and how this could be achieved with limited resources, for example, through revenue raising, savings delivery measures, or other options.**

As we have outlined in our answer to Question 1 it is absolutely vital that budgetary decisions are based on relevant, comprehensive and up-to-date data. We are concerned, along with our WPG colleagues, that reports which have been commissioned by the Department are not included in the consideration of available data and research.

We also wish to reiterate the value of Community and Voluntary sector research which provides important qualitative and lived experience data (as well as including an intersectional perspective) which is relevant to many of the issues contained

within this EQIA. The fact that this is routinely ignored by the Department in successive EQIAs diminishes the value of this research and is particularly damaging as the Department for Communities has responsibility for the Community and Voluntary sector. This runs contrary to the messaging from the Department which highlights the value of the work of the sector yet at the same time ignoring some of its most valuable research and insights.

We refer the Department to the Women's Regional Consortium response to the Department of Finance's consultation on the Financial Context for Revenue Raising consultations.<sup>87</sup> We have made clear in this response that there is a need for changes to the public finances in Northern Ireland but that cuts and savings should not be made from those who have the least and who are already struggling to make ends meet in the context of an ongoing Cost-of-Living Crisis.

While we understand the difficult budgetary situation we are in, we believe that revenue raising is the wrong approach to take. The need for reform has been conflated with the need for cuts and charges for services. We firmly believe that there is an urgent need for investment in our public services rather than cuts, in order to save money in the longer term. We support the need to 'Invest to Save' - to invest in Northern Ireland now in order to save the economy money in the long run. We believe that revenue raising proposals will have a disproportionate impact on those on the lowest incomes (many of whom will be women) and on the most marginalised in our society who can least afford to pay. The consultation already acknowledges that women are more likely to rely on benefits, more likely to suffer financial vulnerability, earn less and have less to retire on than men. The document acknowledges that women have lower earnings, career breaks for family care and provide more unpaid care leaving them in a financially poorer position. It is unconscionable, therefore, to ask women in these positions to suffer further cuts or to have to pay more for services.

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<sup>87</sup> Women's Regional Consortium response to Financial Context for Revenue Raising consultations, Department of Finance, October 2023  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/01/Womens-Regional-Consortium-Response-to-Financial-Context-for-Revenue-Raising-Consultations.pdf>

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Investment in our public services and in our people is vitally important particularly in challenging times. We believe that supporting people to get through these difficult times is the best way to secure the long-term prosperity and wellbeing of people and the economy. For example, investing in social security support for those on the lowest incomes through welfare mitigations and in the social security system more generally will help tackle poverty, health and education inequalities. This money is spent in local shops and businesses therefore improving local economies and communities.

As Lisa Wilson from NERI highlights in relation to the introduction of water charges *“it is important to recognise that the amount estimated as foregone or spent does not necessarily equate to the amount that could be raised or saved. So, if water charges were implemented, it does not necessarily follow that we would raise £345 million. The amount that would be raised would ultimately depend on the final charging model that would be applied and would have to take into consideration the fact that many households in Northern Ireland would severely struggle or be unable to pay anything at all. Such are the dire straits under which many live.”*<sup>88</sup>

**5. 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.

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<sup>88</sup> <https://www.nerinstitute.net/blog/we-are-not-partying-super-parity>

### *Rural Needs Assessment*

We welcome the fact that a Rural Needs Assessment has been carried out this year as this was absent last year. We welcome the reference to the Anti-Poverty Strategy Expert Panel Report included in the RNA which is missing from the EQIA itself. We are again disappointed that no reference to potentially relevant and useful Community and Voluntary Sector data has been included in the RNA – see our answer to Question 1.

### *Cumulative Impact of the Proposed Cuts and Intersectionality*

There has been no analysis of the cumulative impacts of the proposed cuts, across Government departments. 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>89</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. 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.

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<sup>89</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>

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## *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>90</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.
- 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

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<sup>90</sup> [Review education policies - Education GPS - OECD: Economic & social outcomes](#)

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 “*constrained financial position*” and 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 £2.8m 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>91</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>92</sup>

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>93</sup>

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<sup>91</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>92</sup> Northern Ireland Welfare Supplementary Payment and Discretionary Support Schemes Section 75 statistics November 2017 to March 2023, DfC

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

<sup>93</sup> <https://www.lawcentreni.org/cliff-edge-coalition/>



- **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>94</sup>
- **Provide support for private renters affected by the Local Housing Allowance (LHA).** As Housing Rights have outlined in their response: *"In the Private Rented Sector, rent prices continue to inflate at an alarming rate, reaching an average of £960 per month in Northern Ireland and climbing to over £1,100 in Belfast."*<sup>95</sup> *This inflation is causing a serious affordability crisis across Northern Ireland, particularly for the lowest-income tenants who need support most. In Northern Ireland, the poorest quarter of renters in the cheapest quarter of tenancies pay 43.1% of their income on rent alone. In Belfast, the situation is worse, with the lowest-income tenants in the cheapest homes paying almost half (49.8%) of their income on rent alone. This is before factoring in expenses such as heating and food."* Single parents (93% of whom are women) are disproportionately impacted by restrictions to the LHA rate. We are unable to locate up-to-date figures on the proportion of single parent households living in the private rented sector (which should be included as another data gap) single parent households are more likely to reside in the private rented sector. The family type at the highest risk of being in relative poverty was single with children at 35%<sup>96</sup> and for all these reasons single parents are therefore more likely to be in need of support to pay for their housing costs.

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<sup>94</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>95</sup> [NI Housing Market Update: Q1 2025 - Market Reports - News And Analysis - PropertyPal](#)

<sup>96</sup> Northern Ireland Poverty and Income Inequality Report, 2023/24, NISRA & DfC, March 2025  
[https://datavis.nisra.gov.uk/communities/PII\\_report\\_2324.html](https://datavis.nisra.gov.uk/communities/PII_report_2324.html)

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