



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

Via email to: [DoHbudgetconsultation@health-ni.gov.uk](mailto:DoHbudgetconsultation@health-ni.gov.uk)

1<sup>st</sup> June 2026

Dear Department of Health,

Due to pressure of time and workload we are unable to complete a full response to your consultation on the Draft Budget 2026-29/30. We wish to fully endorse the Women's Policy Group response (of which we are a member).

Therefore, please accept this letter as the Women's Regional Consortium<sup>1</sup> response highlighting the following issues:

- We support the concerns raised by our colleagues in the Women's Policy Group that Departments continue to ask the community and voluntary sector to identify **mitigations** to their budget proposals. This is not the role of the sector but is the responsibility of the Departments themselves. The purpose of EQIAs is for Departments to consider the potential impacts on Section 75 groups, to not only identify the disproportionate impacts but to identify ways of mitigating against them and seeking opportunities to promote equality for these protected groups. While this EQIA identifies multiple adverse impacts it does not take an intersectional approach and this means that it has failed to identify some of the impacts. The EQIA also fails in relation to seeking to mitigate these impacts. The consideration of mitigating measures and alternative policies is at the heart of the EQIA process.

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<sup>1</sup> The Women's Regional Consortium in Northern Ireland consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion. The seven groups are: Training for Women Network (TWN), Women's Resource and Development Agency (WRDA), Women's Support Network (WSN), Northern Ireland Rural Women's Network (NIRWN), WomensTEC, Women's Centre Derry and Foyle Women's Information Network (FWIN)

- Equality Commission NI guidance states that EQIAs should show *“that the need to promote equality of opportunity and the desirability of promoting good relations were properly taken into account through the consideration of mitigating measures, or alternative policies that would not have those adverse impacts, or that may even have positive impacts.”*<sup>2</sup>

We agree with our Women’s Policy Group colleagues who have highlighted that it is important that the Department recognise that a mitigation is a specific measure taken to limit or nullify the disproportionate impacts of a cut or change elsewhere in the budget.

- Under the heading ‘Mitigating Actions’ it states: *“The Department has taken forward a number of measures in relation to savings, productivity and efficiency to reduce impacts on frontline services and through this to safeguard patients and protect the population including Section 75 groups.”* There is limited information in relation to these savings and efficiencies. We agree with our Women’s Policy Group colleagues that these are not mitigations. They are ways of finding efficiencies and not mitigations which involve finding alternative approaches that will have a less adverse impact on relevant Section 75 categories.
- The EQIA document states: *“As part of the mitigating actions the Department will prioritise the available funding towards the areas of greatest need, reducing the impact of the cuts to section 75 groups and better promoting equality of opportunity within the Health Service where possible.”* However, there is no detail in the document as to how this prioritisation will be made.
- Alongside our Women’s Policy Group colleagues, we welcome that the EQIA has identified that pressures on services and an increasing need to rely on unpaid care are likely to negatively impact those providing care to dependents. However, despite the fact that the EQIA identifies that unpaid carers are more likely to be women elsewhere in the document, it would be beneficial to cross reference this with the gendered impacts. This highlights the importance of an intersectional approach across the Section 75 characteristics which would help to identify these layered impacts.
- We agree with the Women’s Policy Group who have encouraged the Department to be aware of how their decisions regarding budget prioritisation impact on other Departments and the priority actions agreed in the Programme for Government. The example given by the Women’s Policy Group relates to the greater numbers of women who are economically inactive as a result of caring responsibilities. Caring responsibilities are a major driver of gender inequality. Therefore, it is evident that a decision by the Department of Health has a direct impact on the work of the Department for Communities and on the Department for the Economy. Any cuts to

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<sup>2</sup> <https://equalityni.org/public-authorities/section-75/budget-advice-public-authorities>

packages for care will have a direct impact on both these work streams and make an already bad situation worse.

- We note improvements in the Department's Budget EQIA from last year in terms of the consideration of available data. While we welcome the inclusion of both the Gender Equality Strategy and the Sexual Orientation Expert Panel reports we believe that it is a serious omission that the remaining two Social Inclusion Strategy Expert Panel reports are still excluded from the consideration of available data (Anti-Poverty and Disability) particularly given the obvious links between both poverty, disability and poor health.
- We welcome the inclusion of a number of pieces of relevant research from the community and voluntary sector and in particular the Career or Care report from Carers NI and the Women's Regional Consortium, however, we remain disappointed that a number of pieces of research relevant to this consultation have not been included namely:
  - Women, Skills & Barriers to Work, Women's Regional Consortium, December 2024  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/12/Women-Skills-Barriers-to-Work-1.pdf>
  - The impact of unpaid caring on mental health in Northern Ireland, Carers NI, May 2024  
<https://www.carersuk.org/media/4hwbpwjk/the-impact-of-unpaid-caring-on-mental-health-in-northern-ireland.pdf>
  - 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))
  - Health Inequalities in Northern Ireland: The Impact of the Maternal Advocacy & Support Project, WRDA, January 2023  
<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/672b4f147f67bd726a51b8ac/1730891542981/WRDA-MAS-Research-Report-2023-1+%281%29.pdf>
  - Health Inequalities in Northern Ireland: The Impact of the Cost of Living Crisis on Women's Health, WRDA, February 2024  
<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/670e4ec37296d232ca200688/1728990916910/Key-Research-Findings.pdf>
  - Health Inequalities in Northern Ireland: A Women's Health Strategy for Northern Ireland, WRDA, September 2025  
<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/68dcef057aea163a275c5bcf/1759309573046/Health+Inequalities+in+Northern+Ireland+Chapter+Three+A+Womens+Health+Strategy+for+Northern+Ireland.pdf>
  - Mental Health Matters for Women, Women's Regional Consortium, May 2026

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2026/05/Mental-Health-Matters-for-Women.pdf>

- **Mother and Baby Unit (MBU).** The EQIA does not mention the Mother and Baby Unit. While we welcome the public announcement of funding to begin work on an MBU we would like to see confirmation of full funding and details of support being put in place in the interim.
- **Women’s Health Strategy for Northern Ireland.** Northern Ireland is the only jurisdiction in the UK and Ireland without a Women’s Health Strategy. Research by WRDA advocates for the urgent development of a comprehensive Women’s Health Strategy for Northern Ireland.<sup>3</sup> The absence of a dedicated Women’s Health Strategy means that structural failures persist unaddressed, normalising inadequate care and often forcing community and voluntary sector providers to act as frontline mental health responders. We share the concerns of the Women’s Policy Group that there is no mention of the Women’s Health Action Plan that the Minister has committed to in the EQIA document. Alongside other women’s sector colleagues we have been advocating for a fully funded Strategy but in its absence, we would have expected to see details of the Women’s Health Action plan in this EQIA particularly as it extends to 2029/30.
- **Gender Budgeting.** 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. In the current budget crisis women will experience particular disadvantages due to the pre-existing socio-economic conditions. For example, there is strong evidence that women have suffered disproportionately from over a decade of Westminster austerity measures, the pandemic, and the cost-of-living crisis.<sup>4</sup> As the NI Women’s Budget Group and Women’s Policy Group highlights 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. The Women’s Regional Consortium supports Gender Budgeting as good budgeting bringing greater transparency to the budgeting process, with clearer links to where public money goes and the positive impact it can have on society.

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<sup>3</sup> Health Inequalities in Northern Ireland: A Woman’s Health Strategy for Northern Ireland, WRDA, September 2025

<https://static1.squarespace.com/static/66c475c740e7194ba8ee6a81/t/68dcef057aea163a275c5bcf/1759309573046/Health+Inequalities+in+Northern+Ireland+Chapter+Three+A+Womens+Health+Strategy+for+Northern+Ireland.pdf>

<sup>4</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.

[\(https://blogs.lse.ac.uk/politicsandpolicy/gendered-impacts-of-austerity-cuts/\)](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/>)

- We are pleased to see that a **Rural Needs Assessment** has been attempted however it is extremely light on detail and fails to identify the rural impacts in a region with a significant rural population (36% of the population live in rural areas).<sup>5</sup> Rural dwellers are likely to experience greater adverse impacts as a result of cost reductions as they are more likely to have to travel greater distances to access limited services.

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

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

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

Kind Regards



Siobhán Harding  
Research & Policy Officer, Women's Support Network

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<sup>5</sup> Mid-Year Population Estimates – Urban/Rural Change, NISRA  
<https://www.daera-ni.gov.uk/publications/mid-year-estimates-population-change>