



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

Response to: Draft Equality Impact Assessment - Draft DfC Budget 2021-2022

**Issued by: Department for Communities
January 2021**

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Women's Centre Derry
ACCESS & EMPOWERMENT



**Foyle Women's
Information
Network**



Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.¹ The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

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

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

1.4 The Women's Regional Consortium appreciates the opportunity to respond to the Department for Communities (DfC) Draft Equality Impact Assessment on the Draft DfC Budget 2021-2022. As stated in the consultation document the funding provided by the Executive enables the DfC to provide support to *"meet the needs of some of the most disadvantaged people, families and communities across Northern Ireland."*² As such the DfC is one of the Departments which is most closely aligned to the work of the Women's Regional Consortium in 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 predicted worsening of existing inequalities as a result

² Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 3.6

of the Coronavirus pandemic and the likely adverse impacts of Brexit all of which gives rise for concern about women's equality and economic wellbeing.

1.6 Throughout this response the Consortium has sought to ensure the voices of women are represented. We believe that it is essential for policy makers and Government to listen to the voices of the people who live here and for whom issues such as the Budget have such importance. We have attempted to include throughout this response some of what local women have said in relation to the issues which are important to them and which detail their lived experience of the issues at hand.

1.7 We wish to endorse the responses made by the Women's Policy Group (WPG) and the Northern Ireland Women's Budget Group (NIWBG) both of which groups the Women's Regional Consortium is represented on. We fully endorse their responses and urge the Northern Ireland Executive and the DfC to take their evidence fully into consideration. We make particular reference to the comprehensive Feminist Recovery Plan³ in the WPG's response and to the need for gender budgeting and the calls for a Caring Economy in the NIWBG response. We also wish to endorse the response made by the Cliff Edge Coalition NI of which the Women's Regional Consortium is a member. We reference the importance of the mitigations package in Section 2.4.

³ Covid-19 Feminist Recovery Plan, Women's Policy Group NI, July 2020
<https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>

2.0 General Comments

The consultation on the Draft Budget and associated EQIAs is very important for everyone who lives in Northern Ireland as it is likely to have a considerable impact on their lives. It is vital therefore that there is a consultation process and that engagement with this process is as wide as possible so that the resulting Budget can adequately meet the needs of the citizens who live here.

2.1 The Consultation Process

We welcome the fact that lessons have been learned in relation to the consultation process around the draft Budget. This follows the Equality Commission's findings that the Department of Finance "*failed to comply*" with its equality scheme in the preparation of the 2019/20 Budget. The Commission found that there was no public consultation during the budget development process for 2019/20, either on the draft budget and spending plans, draft budget allocations or on any Equality Impact Assessment of those plans.

The importance of proper consultation around this process was highlighted by the Chief Commissioner of the Equality Commission who said:

*"Consideration of the need to promote equality of opportunity and the desirability of promoting good relations while developing Northern Ireland's budget should be fundamental to the policy making process and not be side-stepped as it was in relation to the 2019-20 budget. This is a legal requirement, compliance is not optional, and compliance with the duties is a vital building block for good governance and accountability within a public authority."*⁴

While we welcome having the opportunity to respond to this important consultation we still have concerns about the consultation process in terms of the tight turnaround for responses with consultees only being given four weeks to respond. We

⁴ Geraldine McGahey, Chief Commissioner, Equality Commission for Northern Ireland, October 2020 <https://www.belfasttelegraph.co.uk/news/northern-ireland/departments-finance-failed-to-comply-with-equality-scheme-ahead-of-budget-39580975.html>

understand that the DfC Draft Equality Impact Assessment consultation was at the mercy of the short deadline for the Draft Budget itself but the concerns remain the same. This consultation opened on the 27th January 2021 with a closing date of just 4 weeks away on 25th February 2021.

This was an incredibly short deadline for an issue of such importance and such a short deadline goes against all existing good practice on consultations: *“When government consults it must build a realistic timeframe for the consultation, allowing plenty of time for each stage of the process.”*⁵

The Covid19 pandemic has had a huge impact on all our lives and on our ability to work and communicate with each other. We acknowledge that the pandemic has also had an impact on government and the work of the departments. For the community and voluntary sector the impacts of lockdown have meant that the ability to carry out normal ways of working have also been severely curtailed. This has been particularly challenging for carrying out research work and in trying to effectively gather the views of people in relation to consultation exercises.

The consultation also came at a time when the women’s sector and indeed the wider voluntary and community sector has come under significant pressure with the sheer volume of consultations ongoing. Many of these consultations are also significant in terms of their importance and many have particular implications for the women’s sector so have required an investment of time and resources to produce detailed responses. These include consultations on a proposed Bill of Rights for Northern Ireland, period poverty, domestic abuse leave and pay and forthcoming consultations on a Carer’s Bill, the draft Programme for Government Outcomes Framework and the Mental Health Strategy.

Despite the fact that there is a challenging work environment the timeframe for responses did not make any allowances for this therefore putting significant pressure on an already over-worked and under-resourced voluntary and community sector.

⁵ nidirect <https://www.nidirect.gov.uk/articles/public-consultations>

We would suggest that given the nature and importance of this Consultation and a range of external factors such as Covid19 restrictions on carrying out research and an already busy consultation environment that the deadline should have been longer to enable genuine and meaningful consultation. We echo the call from our Equality Coalition colleagues for an explanation from TEO as to why the draft budget was blocked from inclusion on the Executive's agenda until its approval on 18th January 2021.⁶ This significantly constrained the time available for consultation and consideration of the equality impacts of the draft budget.

We would refer the Northern Ireland Executive and all Government departments to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.⁷ This guidance contains five top tips based on the many years of experience that women's groups have in promoting women's participation in public policy making. These include the need to work together with the women's community and voluntary sector, making time for accessible face to face engagement, keeping language accessible and relevant, listening to the stories from women and making women visible in the product as well as the process.

We do however welcome the fact that the DfC quickly produced for consultation a detailed draft EQIA on the impact of the draft budget on its functions. We also welcome the fact that the DfC's Audit of Inequalities has identified that women may experience barriers to employment and economic participation.⁸ Importantly it also recognises the critical role that childcare plays in economic participation for women including lone parents and those from disadvantaged backgrounds.⁹ The Audit of Inequalities recognises that the impact of the Covid-19 pandemic will be felt more by certain groups including women who are more likely to work in sectors that have been shut down. We expand on this further in section 2.5.

⁶ [Ministerial Statement Public Expenditure: Draft Budget 2021-22, NI Assembly](#), 18th January 2021

⁷ Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017

https://wrda.net/wpcontent/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf

⁸ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.22

⁹ Ibid

2.2 Gender Inequality

A decade of welfare reform/austerity measures which have impacted more on women, the predicted worsening of existing inequalities as a result of the Coronavirus pandemic and the likely adverse impacts of Brexit particularly in Northern Ireland gives rise for concern about a deterioration in gender equality for women. These are issues that we firmly believe must be a consideration within the draft budget and associated EQIAs.

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 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 equality¹⁰ to go beyond paying lip service to gender 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."*¹¹ The issue of gender neutrality is a significant barrier to women's equality and this issue must be recognised by the DfC in its actions arising from the draft budget.

¹⁰ General Recommendations Adopted by the Committee on the Elimination of Discrimination against Women, Thirtieth session (2004), General Recommendation No 25
https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1_Global/INT_CEDAW_GEC_3733_E.pdf

¹¹ Ibid, paragraph 8

Gendered social norms restrict and limit women's roles in the economy, thereby contributing to women's economic disadvantage relative to men.¹² 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 either for children or other family members which limits their ability to carry out paid 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. The Department of Work and Pensions has described its UC policy as gender-neutral. However, the Women's Budget Group¹³ has highlighted that rather than gender-neutral aspects of Universal Credit disproportionately affect women. This includes conditionality for parents and incentives for second earners as well as using a traditionally gendered 'male breadwinner' model. Locally, research by the Women's Regional Consortium¹⁴ 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 Universal Credit claimants.

¹² 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>

¹³ '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/>

¹⁴ 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>

“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)

“Women, the elderly and disabled are consistently at the bottom of the pile in terms of their importance and value.”

(Participant at Consultation Event)

“Women are the biggest percentage of people here but unfortunately we are not given priority.”

(Participant at Consultation Event)

“We have to keep knocking on doors and fighting for our rights. Women bear the brunt of a lot of issues. In families it is women who are fighting for rights.”

(Participant at Consultation Event)

“We should all go on strike! We saw what happened with Covid in the emergency responses women were always sidelined. There is a need to value what women do. Women are always the add on at the end and it’s totally frustrating.”

(Participant at Consultation Event)

“Caring work is not valued in society and is the bedrock of everything. The value of care and all the stuff normally done within the home. This is at the root of everything and why women can’t participate properly. There is a circular relationship between not valuing care work and undervaluing women. It is undervalued because it is something that women do – there is underlying misogyny.”

(Participant at Consultation Event)

2.3 Women, Poverty, Austerity 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 91% of lone parents are

women¹⁵) are even more vulnerable to poverty. In Northern Ireland 37% of single parents are living in poverty.¹⁶ 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.¹⁷

“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)

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 due to the Covid19 pandemic.

“At the end of the day women and mothers are left with the burden of these issues (referring to low-incomes and poverty). They worry about these things.”

(Quote taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)

The social security system has a vital role to play in easing the impact of poverty on people and families. As the Covid19 pandemic has shown, people need to be able to rely on the social security system when times get tough and they are hit by unexpected costs or lost earnings. A decade of austerity and welfare reform policies have disproportionately impacted on women. Research by the House of Commons

¹⁵ Census 2011 – Key Statistics for Gender, Research and Information Service Research Paper, Ronan Savage and Dr Raymond Russell, Northern Ireland Assembly, 5 September 2014
<http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2015/general/3415.pdf>

¹⁶ Households Below Average Income: Northern Ireland 2018/19, DfC & NISRA
<https://www.communities-ni.gov.uk/system/files/publications/communities/hbai-2018-19.pdf>

¹⁷ A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women’s Budget Group, February 2019
<https://fabians.org.uk/a-female-face/>

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.¹⁸ These welfare reform and austerity measures have tended to limit the ability of the system to protect against poverty.¹⁹

Locally, an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)²⁰ showed that across most income levels the overall 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.

“I don’t know how anyone does it as a single parent. The cost of milk, nappies. There is a ripple effect on children.”

(Quote taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)

Research by the Women’s Regional Consortium on the impact of austerity²¹ and on the impact of Universal Credit²² 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

¹⁸ 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>

¹⁹ 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

²⁰ Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019

https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

²¹ 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>

²² 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>

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 recent 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.”*²³ The Committee recommended that the UK government *“undertake a comprehensive assessment on the impact of austerity measures on the rights of women and adopt measures to mitigate and remedy the negative consequences without delay.”*²⁴

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 the draft budget for Northern Ireland and actions by individual departments arising from the draft budget recognises the contextual factors which increase women’s vulnerability to poverty. These include high rates of female economic inactivity, no childcare strategy, high number of women with adult care responsibilities, a weak labour market, high number of women working part-time and in precarious jobs and wages lower than the UK average.²⁵

²³ 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

²⁴ Ibid, para 18

²⁵ Shadow report for the examination of the UK by the Committee on the Convention to Eliminate Discrimination against Women, NIWEP, January 2019

“The benefits system forces women with children to go out to work. But there is a lack of jobs available and the jobs that are available are often the lowest paid which means that women can’t afford childcare or you end up paying to work.”

(Participant at Consultation Event)

“It would be better if there was a decent amount of benefits to let women stay at home and look after their kids if they want to not this constant pressure to work.”

(Participant at Consultation Event)

“The social security system does not allow people to live lives with dignity.”

(Participant at Consultation Event)

“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)

“Even before Covid there were lots of people reliant on foodbanks because of Universal Credit, the 5-week wait, 2 child limit, etc. These things only push people into poverty. UC is not fair to people it just penalizes people. I feel there are not the right benefits in place.”

(Participant at Consultation Event)

2.4 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.²⁶ This included important mitigation payments around the Benefit Cap and Bedroom Tax as well as providing some help around Universal Credit.

The New Decade, New Approach agreement²⁷ committed to both extending existing mitigations in Northern Ireland beyond March 2020 when they were due to run out

²⁶ 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>

²⁷ 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

and to carry out a review of the mitigation measures. The Cliff Edge Coalition²⁸ have been campaigning not only for the extension of the existing mitigations (and the closing of loopholes in the Benefit Cap and Bedroom Tax mitigations which mean that some claimants are not protected) but for their strengthening to include new challenges such as Universal Credit and the two-child limit.²⁹

We believe these mitigations are 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 vital in the context of the pandemic which is also hitting women so hard (see section 2.5). Strengthening the existing mitigations to provide protections around the two-child limit, Universal Credit and the private rented sector is necessary to protect people, including many women, from the devastating impact of Covid19 and the resulting economic crisis which will follow.

We are firmly of the belief that strengthening the mitigations is essential to provide protections from poverty and financial hardship and also to help with economic recovery. Money provided through benefits is spent in local economies therefore strengthening the mitigations 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 this crisis is a sensible approach.

We welcome the fact that the draft budget contains funding for the continuation of existing mitigations. However, we are very concerned that the draft budget provides no New Decade New Approach allocation to deliver on commitments made to fund new mitigations including offsetting the two-child policy which is likely to have a harsher impact in Northern Ireland due to larger average family sizes in Northern Ireland compared to GB. We also remain very concerned about the impact of the

²⁸ The Cliff Edge NI Coalition 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 member of the Coalition's Working Group and the Women's Regional Consortium is a Coalition member.

²⁹ Cliff Edge Briefing Paper, September 2020

<https://lawcentreni.s3.amazonaws.com/Cliff-Edge-Coalition-Briefing-Dec-2019v2.pdf>

Universal Credit five-week wait and its impact on low income families and women. Our research with women³⁰ (see section 2.6) clearly shows its very negative impacts and along with our colleagues in the Cliff Edge Coalition we have called on government to introduce local mitigations to help alleviate the impact of the five-week wait.

“I just think it is a shambles the way Universal Credit is structured. I only get money for two of my children and nothing for the baby. The only money I get for the baby is Child Benefit.”

“It would really help if you got a payment in the initial wait that you didn’t have to pay back. It would help you not get into any more debt.”

“If I had known about the Contingency Fund that would have really helped. Now they are taking £75/month off me and I’m really struggling and getting into more debt.”

(Quotes taken from Women’s Regional Consortium Research on the Impact of Universal Credit on Women, September 2020)

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, welfare reform has impacted more on women and Covid19 has increased the numbers of people relying on social security benefits many of whom will be women. The impact of this is made more difficult to quantify due to a lack of statistics broken down by gender particularly in relation to Universal Credit. However, latest figures available show 28% of Universal Credit claimants were lone parents (the majority of lone parents are women).³¹ Equality statistics on the mitigation payments themselves show that these were paid to more women than men.³²

³⁰ 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>

³¹ Northern Ireland Benefits Statistics Summary, DfC & NISRA, August 2020
[NI Benefits Statistics Summary - August 2020 \(communities-ni.gov.uk\)](http://communities-ni.gov.uk/publications/benefits-statistics-summary-august-2020)

³² Northern Ireland Welfare Supplementary Payment Schemes, Section 75 statistics November 2017 to April 2019, DfC
<https://www.communities-ni.gov.uk/publications/welfare-supplementary-payments-discretionary-support-standards-advice-assistance-and-sanctions>

As members of the Cliff Edge Coalition we are also concerned about the lack of budget to strengthen the welfare mitigations package to protect low-income private renters impacted by cuts to housing benefits over the last decade paid at the Local Housing Allowance (LHA) rate. Single parents (91% of whom are female) are disproportionately impacted by cuts to the LHA rate. By 2019, 45% of single parent households were living in the private rented sector (compared to 23% in 2003).³³ Single parent households are more likely to be impacted by poverty and are therefore more likely to be in need of support to pay for their housing costs.³⁴

Furthermore, women with children have been disproportionately affected by reduced hours and earnings as a result of the pandemic.³⁵ Single parents are also more likely to live in two-bedroom properties and the rents for these types of properties have increased disproportionately from other types of properties³⁶ particularly at the lower end of the market, which would be the properties which low income single parent households are more likely to occupy. This suggests that single parent households will be more adversely affected by any cuts to the LHA rates.

2.5 The Impact of the Coronavirus pandemic on Women

The ongoing Covid19 pandemic has created unprecedented challenges across the world. The crisis affects men and women differently and in many cases deepens the inequalities that women already experience. Women are more likely to bear the brunt of this crisis for a number of reasons:

- Women are more likely to be low paid and in insecure employment. Women were the majority of low paid earners (69%) the majority of those in part-time employment (74%), involuntary part-time employment (57%), temporary employment (54%), zero-hours contracts (54%) and part-time self-employment (59%).³⁷

³³ <https://www.communities-ni.gov.uk/publications/family-resources-survey-report-2018-2019>

³⁴ <https://www.communities-ni.gov.uk/publications/households-below-average-income-northern-ireland-201819>

³⁵ NERI blog post, August 2020

<https://www.nerinstitute.net/blog/womens-livelihoods-must-not-be-sacrificed-after-lockdown>

³⁶ <https://www.housingrights.org.uk/sites/default/files/policydocs/Falling%20Behind%20LHA%20full%20research%20Oct%202019.pdf>

³⁷ Submission to the Women and Equalities Select Committee inquiry: Unequal impact? Coronavirus and the gendered economic impact, Women's Budget Group, June 2020
<https://wbg.org.uk/wp-content/uploads/2020/06/WBG-Gender-economic-impact-submission.pdf>

- Female employees were more likely than male employees to be working in jobs paying the National Minimum Wage. Low paid women were more likely than low paid men to remain stuck in low paid jobs;³⁸
- Women are twice as likely to be key workers as men, 65% of key workers are female compared to 47% of the whole working population;³⁹
- In Northern Ireland women make up 79% of health and social care staff.⁴⁰
- Many of the workers in health and social care sectors are low paid. 98% of the 1 million high exposure key workers being paid less than 60% of median average wages are women.⁴¹
- Employed women were a third more likely than employed men to work in shutdown sectors over the first national lockdown with one in six (17%) of female employees in such sectors compared to one in seven (13%) of male employees⁴² making them at particular risk of job loss.
- HMRC statistics show that across the UK more women than men were furloughed with 1.92 million females furloughed at 30 November 2020 compared with 1.79 million men.⁴³
- On average, women carried out 60% more unpaid work than men reducing the time available for paid work meaning that they earn less, own less and are more likely to be living in poverty.⁴⁴

³⁸ Unequal impact? Coronavirus and the gendered economic impact, Women & Equalities Committee, UK Parliament, February 2021

<https://publications.parliament.uk/pa/cm5801/cmselect/cmwomeq/385/38502.htm>

³⁹ Risky business, Economic impacts of the coronavirus crisis on different groups of workers, Resolution Foundation Briefing, April 2020

<https://www.resolutionfoundation.org/app/uploads/2019/10/Risky-business.pdf>

⁴⁰ Who Runs Northern Ireland? A Summary of Statistics Relating to Gender and Power in 2020, Northern Ireland Assembly Briefing Paper, January 2020

http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2017-2022/2020/assembly_exec_review/0120.pdf

⁴¹ Low-paid women in UK at 'high risk of coronavirus exposure', The Guardian, March 2020
<https://www.theguardian.com/world/2020/mar/29/low-paid-women-in-uk-at-high-risk-of-coronavirus-exposure>

⁴² Sector shutdowns during the coronavirus crisis: which workers are most exposed? Institute for Fiscal Studies Briefing Note BN278, April 2020

<https://www.ifs.org.uk/uploads/BN278-Sector-Shutdowns.pdf>

⁴³ Coronavirus Job Retention Scheme statistics: January 2021, HMRC

<https://www.gov.uk/government/statistics/coronavirus-job-retention-scheme-statistics-january-2021/coronavirus-job-retention-scheme-statistics-january-2021>

⁴⁴ Women shoulder the responsibility of 'unpaid work', Office for National Statistics, November 2016
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/articles/womenshouldertheresponsibilityofunpaidwork/2016-11-10>

- Women are less likely to be eligible for Statutory Sick Pay (SSP) because they are overrepresented in low paid work and on zero hours contracts. Women's Budget Group calculations find that 15.5% of women and 10.6% of men do not earn enough to qualify for SSP.⁴⁵ This points to a disproportionate financial impact of self-isolation on women.

In July 2020 the Women's Policy Group Northern Ireland published a comprehensive Feminist Recovery Plan⁴⁶ highlighting many of these issues and calling on decision-makers across the UK to take action to ensure a gender-sensitive response in the transition from crisis response to recovery. This plan provided clear evidence for how to prioritise actions coming out of the pandemic. Despite this call there has been little progress in alleviating the impact of the pandemic on women.

A Women and Equalities Committee report⁴⁷ into the gendered economic impact of the Coronavirus crisis has highlighted how existing gendered inequalities in the economy have been ignored and sometimes exacerbated by the pandemic policy response. The Committee stated: *"We are concerned that the Government Equalities Office (GEO) did not anticipate how inequalities were likely to be exacerbated by the pandemic and ensure that it influenced the policy response, including in relation to employment, welfare, childcare and pregnancy and maternity. We have seen little evidence that the Government has conducted any robust or meaningful analysis of the gendered impact of its economic policies during the Coronavirus crisis."*

Following the publication of this report a coalition of organisations including the Trades Union Congress (TUC), Amnesty International, Save the Children and the Fawcett Society have signed a letter to the Equality and Human Rights Commission

⁴⁵ Submission to the Women and Equalities Select Committee inquiry: Unequal impact? Coronavirus and the gendered economic impact, Women's Budget Group, June 2020

<https://wbq.org.uk/wp-content/uploads/2020/06/WBG-Gender-economic-impact-submission.pdf>

⁴⁶ Covid-19 Feminist Recovery Plan, Women's Policy Group NI, July 2020

<https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>

⁴⁷ Unequal impact? Coronavirus and the gendered economic impact, Women & Equalities Committee, UK Parliament, February 2021

<https://publications.parliament.uk/pa/cm5801/cmselect/cmwomeq/385/38502.htm>

(EHRC) arguing that the government has failed in its duty to consider the impact of key policies on women and other groups protected under the Equality Act.⁴⁸ The letter states: *“This is a time of crisis for women. The coronavirus pandemic is having a significant and disproportionate impact on women’s health, jobs and livelihoods. The policy decisions taken by government and other key public bodies in response to coronavirus are worsening the impact of the pandemic and deepening inequalities faced by women. The consequences of these decisions will affect women for years to come.”*

It is clear that some groups are particularly affected by pandemic. The low paid, young and female workers stand out as the groups putting their lives at risk by continuing to work in close proximity to others, and most likely to be experiencing direct financial pain from the economic shut down.⁴⁹ This must therefore be the focus of the actions coming from all the government departments in Northern Ireland and particularly the DfC as the department responsible for social security benefits, employment support and promoting social inclusion including gender equality.

We welcome the fact that the DfC’s draft EQIA identifies that women are one of the groups more affected by the Coronavirus crisis.⁵⁰ While this has rightly been identified the draft budget itself does little to provide for the targeted help needed to address the impact and needs of women as a result of the pandemic.

It is imperative that as society emerges from the Covid19 pandemic and resulting recession that women must not pay the price as they did for the previous financial crash. Women have already suffered immensely due to a decade of austerity policies and this must not be allowed to happen again. There is a real need in Government recovery planning for targeted support to ensure that those who have

⁴⁸ <https://www.theguardian.com/society/2021/feb/15/ehrc-urged-to-investigate-ministers-for-equality-failures-in-covid-response>

⁴⁹ Risky business, Economic impacts of the coronavirus crisis on different groups of workers, Resolution Foundation Briefing, April 2020
<https://www.resolutionfoundation.org/app/uploads/2019/10/Risky-business.pdf>

⁵⁰ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.22

been impacted the most by this pandemic are given the help they need to prevent and reduce poverty.

“Women don’t have equal rights and Covid has highlighted a lot of that. Women are struggling with homeworking, looking after children and working at the same time. Men’s jobs are seen as more important.”

(Participant at Consultation Event)

“It’s a real hard time for everyone especially women.”

(Participant at Consultation Event)

“Caring mostly falls to women, it’s a big issue for women.”

(Participant at Consultation Event)

“There is still the assumption that it is women who will provide care. If there is care needed it is assumed that women will provide it whether for parents, children or grandchildren. Women are expected to care yet there are not the services there to support them.”

(Participant at Consultation Event)

2.6 The Impact of the Coronavirus pandemic on the Social Security System

Job losses, reductions in working hours and the need to provide increasing levels of care as a result of the Covid19 pandemic is likely to increase dependence on social security benefits. The social security system has a vital role to play in easing the impact of financial hardship and poverty on people and families. This is particularly the case for Universal Credit as the main benefit claimed by those who are experiencing reduced incomes.

It is important to note the impact of the Covid19 pandemic on Universal Credit claimant numbers. In Northern Ireland new claims to Universal Credit experienced a massive increase as a result of the lockdown rising to 35,420 new claims in March 2020 from 6,630 new claims in February 2020. There are now 114,530 households on Universal Credit in Northern Ireland an annual percentage increase in claimant numbers of 156.7%.⁵¹

⁵¹ Northern Ireland Benefits Statistics Summary, DfC & NISRA, August 2020

The numbers of people claiming Universal Credit are likely to continue to rise even further as a result of the recession arising out of the pandemic and the fact that many people will be unable to get work due to economic constrictions. This will mean more people, including many women, relying on Universal Credit to provide for themselves and their families and will put a focus on the ability of Universal Credit to enable families to weather this storm.

As society emerges from the Coronavirus pandemic and the resulting recession it is imperative that women do not pay the price as they did for the previous financial crash. Part of the solution must be to ensure that the benefits system (particularly Universal Credit as the Government's main welfare provision) provides sufficient support to the large numbers of women likely to be impacted by the crisis due to existing gender norms.

Women's Regional Consortium research on the impact of Universal Credit on Women⁵² has shown that women's experiences living on Universal Credit are overwhelmingly negative. The research highlights how the design of Universal Credit does little to protect women and their children from living on low incomes and in poverty. The research recommended that in its recovery response Government should apply an intersectional gender lens to social security policy, particularly in relation to Universal Credit, so that policies are developed and implemented to specifically support women who have been impacted by the Coronavirus crisis.

“With just Universal Credit it’s no life to live. We can’t have the heating on just when it’s really cold because we can’t afford the gas, we had to have just hot water bottles at night. Thank God for food banks otherwise eating would have been much worse. No new clothes! I’m glad my little one is only small and doesn’t seem to pick up on trends and knows we don’t have much money so she doesn’t ask for much because I can never afford it.”

(Quote taken from Women's Regional Consortium Research on the Impact of Universal Credit on Women, September 2020)

[NI Benefits Statistics Summary - August 2020 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/nl-benefits-statistics-summary-august-2020)

⁵² 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>

It is arguable that there has never been a greater need for Universal Credit and the social security system to help people navigate their way through these unprecedented circumstances and to help prevent financial hardship and poverty. This need is likely to remain well into the future not just during lockdown restrictions as the economy is unlikely to recover for some considerable time.

The DfC's EQIA rightly identifies the increases in demand for working age benefits as a direct result of Covid19 related unemployment. In addition, it recognises that increased numbers of people will require employment support to help them enter employment and reduce their dependence on benefits.⁵³ It also acknowledges that the draft budget allocation does not provide funding to address this need which is likely to impact on a number of Section 75 categories. We believe that this will have more adverse implications for women and their dependents for all the reasons previously outlined in section 2.5.

Given the impact of the pandemic on claimant numbers for Universal Credit and the negative impacts of Universal Credit for women we have significant concerns about the implications of the lack of a Covid19 allocation in the draft budget.⁵⁴ This allocation was to address the need to increase staffing numbers to process and pay working age benefits. The DfC's EQIA states that this will have to be "*significantly scaled back*" as the draft settlement provides no Covid19 allocation to enable the necessary increase in staff. The Department explained that this will mean increases in processing times for new claimants and that payment to customers will be delayed as well as delays in processing changes of circumstances.

Women's Regional Consortium research⁵⁵ showed the harsh impacts of the Universal Credit five-week wait on women and their families. Almost all of the women reported negative impacts due to the five-week wait. Many had needed to borrow money from family members/friends or lenders to survive. Some had been

⁵³ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.6

⁵⁴ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.11

⁵⁵ 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>

forced to cut back on food/essentials to make ends meet and others had resorted to selling their possessions or using a foodbank. The personal impacts of the five-week wait were severe with 89% of the women suffering stress/anxiety as a result of the wait and the worry about how they would provide for their families. Others reported getting into debt or further in debt and getting behind with their bills. Sadly, some of the women reported that the five-week wait had impacted negatively on their children or that they had felt cold/hungry due to a lack of money.

“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.”

“The five-week wait was horrendous. I sold my sofa and had to borrow as well.”

“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)

It is simply unconscionable to accept that this wait would be lengthened in any way as a result of staff shortages within the DfC 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 local mitigations to help address the impact of the five-week wait in Northern Ireland. It is clear with this proposed budget allocation that that this will not be possible and indeed that the five-week wait is likely to increase. This will have huge implications for Universal Credit claimants including the many women who will need to claim it as a result of the Coronavirus pandemic.

It is difficult to quantify the impact of these issues on women as Universal Credit statistics are not currently broken down by gender. However, latest figures available show 28% of Universal Credit claimants were lone parents (the majority of lone

parents are women).⁵⁶ We believe that this likely reduction in staffing levels will have particular adverse impacts for women for all the reasons already outlined in this response.

2.7 Access to Independent Advice

Women's Regional Consortium research on the impact of austerity/welfare reform on women⁵⁷, women and debt⁵⁸ and the impact of Universal Credit on women⁵⁹ 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 issues around poor financial literacy and capability there has never been a greater need for access to independent advice. The Women's Regional 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.

We are disappointed that in this current climate of an unemployment crisis as a result of the pandemic that no resource allocation has been made in the draft budget to support the independent advice sector. The DfC EQIA states: *"The Department's proposed Budget 2021-22 allocation also includes no allocation for the independent advice sector to support welfare change. This equates to a £1.5m reduction in funding to the advice sector which provides help and support to some of the most vulnerable in our society, including young people, older people and people with disabilities. Lack of funding for the advice sector, is also likely to impact on a number*

⁵⁶ Northern Ireland Benefits Statistics Summary, DfC & NISRA, August 2020
[NI Benefits Statistics Summary - August 2020 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/nibss/)

⁵⁷ 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>

⁵⁸ 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>

⁵⁹ 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>

of Section 75 categories.”⁶⁰

Advice NI have detailed a number of reasons why they expect demand for their advice services to grow⁶¹ including increases in the claimant count, the end of the furlough scheme and increases in Universal Credit claimants to name but a few. Bob Stronge from Advice NI said: *“The proposal not to prioritise this funding within its budget is very short-sighted, will impact our most vulnerable at a time when they need all the independent advice they can get.”*⁶²

We simply cannot understand how resources can be effectively cut for the advice sector at a time when demand for their services is likely to be at its highest. Many people will be applying for benefits for the first time as a result of the pandemic and will need help to navigate complex social security systems and ensure that they can access their rightful entitlements. This reduction in advice provision is likely to create significant impacts on Section 75 groups particularly on people already disproportionately impacted by the pandemic including women, people with dependents, people with disabilities and BAME communities.

“You need someone with knowledge to help people with the system. It is so complex, the language used confuses people.”

“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.”

“It doesn’t make sense to me – it’s so confusing. People don’t understand the system they just want to get their money.”

“People need advice and they are cutting funding for advice when people need it. People need to get independent advice from someone that understands the system.”

(Quotes taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)

⁶⁰ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.19

⁶¹ <https://www.adviceni.net/blog/advice-ni-proposed-department-communities-budget-bombshell>

⁶² Ibid

2.8 Employment Support

The DfC's EQIA acknowledges that increased numbers of people will now require employment support to help them enter employment and reduce their dependence on benefits.⁶³ This type of employment support will be needed now more than ever due to the increased numbers of people who are unemployed and claiming social security benefits as a result of Covid19. The EQIA goes on to state that the draft budget allocation provides no additional funding to address this and that will likely adversely impact several Section 75 groups.

In its Audit of Inequalities, the DfC EQIA states that this lack of funding to provide employment support is likely to adversely impact on both men and women.⁶⁴ We suggest that while this will undoubtedly adversely impact both men and women it will have worse impacts for women than men. This is as a result of all the reasons already outlined in section 2.5 of this document. Women are more likely to be in receipt of social security benefits, more likely to be in part-time, insecure work, more likely to be economically inactive, more likely to have caring responsibilities limiting their time available for work and more likely to have lost their jobs as a result of the Covid19 pandemic.

The Northern Ireland economic inactivity rate has increased to 27% and it is consistently above the UK average (now at 20.7%). The female economic inactivity rate is 30.9% compared to 23% for men.⁶⁵ In looking at the detail of economic inactivity it shows that more than a third of women who were unavailable for work gave the reason for inactivity as family/home commitments (61,000 or 34%) and this was the least likely reason for male inactivity (at 8,000 or 6%).⁶⁶ This is an important consideration in terms of employment support as women are clearly in need of increased employment support in order to be able to move into work. It is clear that

⁶³ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.6

⁶⁴ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.22

⁶⁵ Northern Ireland Labour Market Report, NISRA, January 2021

<https://www.nisra.gov.uk/system/files/statistics/labour-market-report-january-2021.pdf>

⁶⁶ Women in Northern Ireland 2020, NISRA, June 2020

https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/Women%20in%20NI%202020_0.pdf

some form of childcare support tied to schemes helping women back into work would be beneficial (see also section 2.9).

In addition, the DfC's EQIA highlights the issue of youth unemployment. This is an area of major concern as research shows that more than one in 10 people aged 16 – 25 have lost their job and just under 6 in 10 have seen their earnings fall since the Covid19 pandemic began.⁶⁷ This research found that young workers were twice as likely to have lost their jobs compared to older employees and that employment and earnings losses are more pronounced for women, the self-employed and those who grew up in a poor family. The DfC's EQIA references a report by the Institute for Fiscal Studies which found that the lockdown hit young people the hardest.⁶⁸ This report however also states that on the eve of the crisis the sectors that are shut down as a result of social distancing measures employed nearly a third (30%) of all employees under the age 25 (25% of young men and 36% of young women). So it is clear therefore that young women will be more impacted by youth unemployment as a result of the Covid19 pandemic than young men.

The Women's Regional Consortium is greatly concerned that in the absence of funding in the draft budget a decision has been taken to postpone the launch of a number of employment support programmes.⁶⁹ This includes the JobStart programme for 16 – 24 year olds and Advisory Discretion Fund Expansion including the payment of upfront childcare costs to support parents to return to employment.⁷⁰ We believe that both these labour market response offerings would have been particularly beneficial to women.

Kickstart the GB equivalent of JobStart was launched in GB in September 2020 to help 16 – 24 year olds find employment. As the DfC's EQIA acknowledges the lack

⁶⁷ Generation COVID and Social Mobility: Evidence and Policy, Centre for Economic Performance, October 2020 <https://cep.lse.ac.uk/pubs/download/cepcovid-19-011.pdf>

⁶⁸ Sector shutdowns during the coronavirus crisis: which workers are most exposed? Institute for Fiscal Studies Briefing Note BN278, April 2020 <https://www.ifs.org.uk/uploads/BN278-Sector-Shutdowns.pdf>

⁶⁹ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.14

⁷⁰ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.13

of funding for programmes such as these will leave Northern Ireland “*as the only region on these islands that will not be adequately resourced to support people who face unemployment in the middle of the biggest economic crisis faced in our lifetime.*”

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2.9 Childcare

Research shows that 40% of families in Northern Ireland (around 350,000 workers) have dependent children.⁷² Childcare is the biggest monthly bill faced by 33% of families in Northern Ireland costing more than their mortgage or rent payments and for 60% of parents their childcare bill is their largest or second largest monthly outgoing.⁷³ The World Economic Forum found that UK parents pay the highest childcare costs in Europe and the second highest in the world.⁷⁴

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.

Research by Employers for Childcare⁷⁵ in Northern Ireland shows that families in Northern Ireland can expect to pay a greater proportion of their household income on childcare than households across the UK as a whole with the average cost of a full-time childcare place equating to 35% of the median household income before housing costs. This is amongst the highest in the OECD countries.

The CEDAW Committee has also raised the issue of childcare costs specifically in Northern Ireland noting its concern “*that childcare costs remain excessive,*

⁷¹ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.16

⁷² Employment and access to childcare during the Covid-19 crisis, Nevin Economic Research Institute, May 2020

<https://www.nerinstitute.net/research/employment-and-access-childcare-during-covid-19-crisis>

⁷³ Northern Ireland Childcare Survey 2020, Employers for Childcare, November 2020

<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2020/>

⁷⁴ <https://www.weforum.org/agenda/2019/04/these-countries-have-the-most-expensive-childcare/>

⁷⁵ Northern Ireland Childcare Survey 2020, Employers for Childcare, November 2020

<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2020/>

*particularly in Northern Ireland, which constitutes an obstacle for women to enter and progress in the workplace.”*⁷⁶ The Committee recommended that Government should ensure the availability of affordable and accessible childcare particularly in Northern Ireland.⁷⁷

We are pleased to see the DfC EQIA acknowledge the importance of childcare particularly to women. The EQIA states: *“Childcare can also act as a barrier to moving towards employment or obtaining, retaining or progressing within employment, particularly for women, lone parents and those from disadvantaged backgrounds.”*⁷⁸ The availability of accessible, affordable childcare is a key consideration for women’s participation in the economy and for women’s education and training.

Despite the importance of childcare to women’s economic participation and the running of the economy it was extremely concerning to note that childcare was completely absent from the Northern Ireland Executive’s Roadmap to Recovery. Neither did childcare feature in the UK or Ireland’s recovery roadmaps. Childcare is a vital part of our economic infrastructure and it is therefore essential that it is a key component in any pathway to recovery and properly supported both now and into the future. We are in agreement with our campaign partners in Childcare for All that *“the childcare needs of everyone in the Northern Ireland workforce must be at the forefront of planning to ensure parents and providers are not facing unnecessary risks or barriers to work.”*⁷⁹

If the pandemic has taught us anything it is the importance of childcare to the running of the economy and this must become a higher priority for policymakers. Childcare

⁷⁶ 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

⁷⁷ Ibid, para 46

⁷⁸ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.22

⁷⁹ Childcare for All Campaign – COVID-19 Statement, May 2020
<https://www.childcareforallni.com/post/childcare-for-all-campaign-covid-19-statement>

plays a crucial role in getting people into employment and in helping to tackle disadvantage and gender inequality. The Women's Regional Consortium believes that childcare must be given a stronger focus within the draft budget for Northern Ireland in order to help with many of the issues outlined including increasing unemployment levels, high levels of economic inactivity for women and an economic downturn.

“There are a lot of impacts for lone parents – it is no joke for them. There are no crèche facilities/childcare in this area. Women can’t afford the childcare that does exist.”

(Participant at Consultation Event)

“I am a lone parent, there is a lack of suitable jobs in the area, expensive childcare and I have mental health issues. I would struggle financially if working full-time with childcare costs, rent and regular expenses so it isn’t really a viable option.”

(Participant at Consultation Event)

“I can’t afford childcare as I don’t get any support with it. I am lucky I have family to look after my kids. Without them I would need to leave work. My salary is not enough to pay the mortgage and childcare without some help.”

(Participant at Consultation Event)

“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)

2.10 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.

2.10.1 The Women's Centres Childcare Fund (WCCF)

It 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.

WCCF enables Women's Centres to provide childcare places that are 100% supported for the most disadvantaged children and families. These sessional places (77,000 two-hour sessions) ensure that disadvantaged children have an opportunity to experience a childcare setting, to socialise, interact, play and learn in a supported environment.

Parents who avail of WCCF supported childcare also access a wide range of programmes available in their communities. Many of the services involve support to parents including: parenting skills, back to work programmes, advice services and health programmes. Therefore, WCCF enables the most excluded in disadvantaged communities to access support and engage 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.

WCCF contributes to reducing child poverty, provides opportunities for parents to better themselves and contributes to their communities thereby tackling

disadvantage. As such the WCCF strongly aligns with a number of government strategies including: the Child Poverty Strategy, the Anti-Poverty Strategy and the Gender Equality Strategy. It also aligns with one of the immediate 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.⁸⁰

Whilst DfC has no policy responsibility to provide regional childcare in Northern Ireland, the rationale to continue to provide funding through the WCCF is the contribution that it makes to reducing 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.”⁸¹

Despite the importance of this childcare offering 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% in that period. The Women’s Regional Consortium believes that this is a hugely important area of funding for the department. We argue that any progress on childcare provision in Northern Ireland (see section 2.9) must recognise the need for low cost/no cost childcare provision for marginalised women in disadvantaged and rural areas. The Consortium also believe that government should recognise the case for properly sustaining childcare provision through the WCCF model on a ring-fenced, protected basis given the Fund’s positive evaluation⁸² in terms of need, impact and value for money.

⁸⁰ 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

⁸¹ <https://www.communities-ni.gov.uk/about-department-communities>

⁸² Evaluation of Regional Support Arrangements for the Voluntary and Community Sector, Final Report, June 2015, DSD and DARD

“I can only do a course if it has childcare available.”
(Participant at Consultation Event)

2.10.2. Community-based training and education

The right to education is an important means to achieve gender equality. It is important that education and training is provided over the course of a lifetime and adapts to changing life circumstances. 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 education, course fees and the academic environment.

Women's exclusion from participation 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 as outlined in section 2.10.1.

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 budget allocation given that it helps in the achievement of a number of the department's

priorities including gender equality, employment support and anti-poverty and child poverty work.

“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)

2.10.3. 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. 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. Of the 14 women’s centres, three receive funding under Neighbourhood Renewal and 11 under the Community Investment Fund (CIF) to support longer term community development via funding towards essential staff salaries and key overhead costs. However, since 2012 these funds have been subject to austerity cuts which has 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, employee pensions have been introduced and contributions raised which has

increased substantially the gap between what was originally funded and what can actually be covered now.

The Women's Regional Consortium is funded by the DfC in partnership with DAERA through the Regional Infrastructure and 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 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 thirteen consultations, produced two research papers and have brought the lived experience of local women and their views to the development of both the Gender Equality and Anti-Poverty Strategies. Funding for the Consortium has also been significantly reduced due to austerity measures.

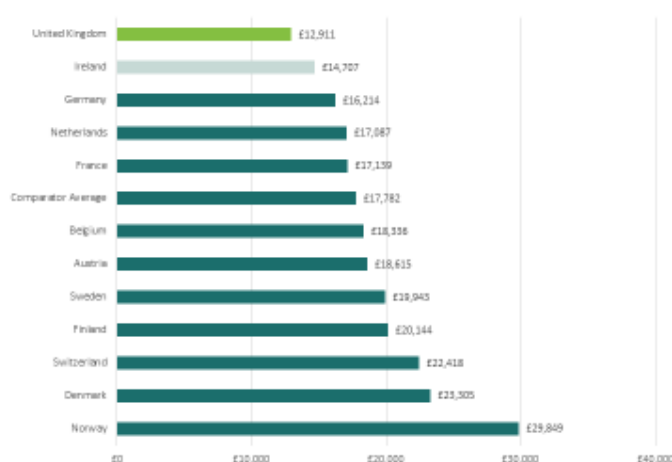
These vital services delivered locally by community organisations such as Women's Centres and supported by the work of the Women's Regional Consortium are vital to tackling disadvantage and promoting gender equality. These local services which support statutory provision are the most cost effective way 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.

2.11 Draft Budget Spending

We wish to highlight some issues raised by the Nevin Economic Research Institute (NERI) in relation to the draft budget which give cause for concern. While Northern

Ireland has seen an increase in funding through the Barnett formula for this year the entirety of this funding must meet obligations set out in New Decade New Approach. The reality is that Northern Ireland has more or less the same budgetary settlement that it started out with over a decade ago during the global financial crisis. This is combined with the fact that the UK is a low-spend state with the UK government spending over £4,800 less per person than the average comparator (see graph below). Northern Ireland is therefore constrained by this set of policy choices and this low level of public spending is accompanied by low levels of revenue.

Public spending per person western Europe



Graph: Courtesy of NERI

NERI maintains that if Northern Ireland is to escape from this current cycle of budget inadequacy it will require action beyond the remit of the Northern Ireland Executive. If the chronically underfunded public services that currently exist are to survive and if we wish to go further and provide new supports like decent social insurance and childcare then bold action is required.

2.12 Rural Needs

In June 2017 the Rural Needs Act (Northern Ireland) 2016 was introduced and placed a statutory duty on public authorities to have due regard to rural needs when

developing, adopting, implementing or revising policies, strategies and plans, and when designing and delivering public services. The Act was introduced to ensure that consideration of the needs of people in rural areas becomes more firmly embedded within public authorities in Northern Ireland.

Research by NIRWN shows that rural women are under increasing pressure from the economic climate leaving them experiencing more poverty and social isolation than ever before.⁸³ Rural women are particularly vulnerable to access poverty meaning that they are unable to address their financial poverty if they lack access to affordable childcare and transport to allow them to access better paid, better quality jobs.

We are disappointed to note that neither the draft budget itself or the DfC's EQIA have included a Rural Needs assessment. This is supposed to be carried out at the early stages of policy development including in the development of draft budgets. The Women's Regional Consortium would have liked to have seen a rural needs assessment carried out particularly given the fact that Northern Ireland has a significant rural population with 36% of the population living in rural areas.⁸⁴

⁸³ Rural Women's Manifesto, NIRWN, September 2015
<https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf>

⁸⁴ Mid-Year Population Estimates – Urban/Rural Change, NISRA
<https://www.daera-ni.gov.uk/publications/mid-year-estimates-population-change>

3.0 Specific Questions

1. Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 5 of the EQIA consultation document? If so, what are they? Please provide details?

We are concerned that there is a lack of gender disaggregated data in a number of areas including in some areas of benefits (most importantly in Universal Credit), in the government's furlough scheme, redundancies and in poverty and wealth data. This paucity of data in relation to gender makes it extremely difficult to fully assess and address objective need. Without access to data disaggregated by gender and across all the Section 75 groups analysis of impact and intersectionality issues is made more difficult. It is also vital in determining where actions should be directed to effectively address the issues. In some cases there is no data available for Northern Ireland, for example, there is no survey in Northern Ireland that gathers information on wealth.

2. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in section 6 of the EQIA Consultation document? If so, what are they?

We welcome the fact that section 6 of the EQIA consultation document acknowledges the adverse impacts for women in a number of areas including in terms of barriers to employment and economic participation, employment support, childcare and the impact of the lockdown. Throughout our response in Section 2.0 we have highlighted a range of areas where we believe that women will feel even more adverse impacts than men including:

- the need to acknowledge that women experience the economy differently than men – they are more likely to be in low paid, part-time, insecure work, more likely to be in receipt of social security benefits, more likely to be providing care and more likely to have to make up for cuts in services through unpaid work;

- women's different experience of the economy means that they are more likely to have lower incomes over their lifetimes and are more vulnerable to poverty;
- women act as the 'shock absorbers' of poverty in the home often going without food, clothes or warmth in order to meet the needs of other family members when money is tight;
- women have been disproportionately impacted by a decade of austerity/welfare reform policies;
- gendered welfare reform policies such as the two-child limit and Benefit Cap have had much greater adverse impacts on women;
- the introduction of Universal Credit has also had greater negative impacts on women and it has been described as discriminatory by design;
- it is vitally important that the draft budget and actions by individual departments, particularly the DfC, recognises these contextual factors which increase women's vulnerability to poverty and which impact on their participation in the economy;
- a lack of funding to strengthen the existing mitigations package will more adversely impact on women as they are more likely to claim social security benefits and have been more impacted by welfare reform. Specifically, the two-child limit has greater impacts for women and greater impacts overall in Northern Ireland due to larger family sizes here;
- the Covid19 pandemic has hit women harder with women more concentrated in low-paid work and more likely than men to have been employed in sectors that have been shut down such as retail, hospitality and travel. Women have also carried out more unpaid work and care work than men as a result of the pandemic;
- despite the gendered economic impact of the pandemic the government response has ignored this and sometimes made existing gender inequalities worse. Targeting government help to those most affected by the crisis, including women, must be the focus of actions from all the government departments in Northern Ireland to address the impacts and needs of women as a result of the pandemic;

- as women are more likely to claim social security benefits, be in low paid, part-time work, more likely to be providing care and have been more adversely impacted by the pandemic they are much more likely to be adversely impacted by reductions in staffing numbers to process and pay working age benefits, increased waiting time for benefits and reductions in access to independent advice;
- for all the reasons listed above and because of higher economic inactivity levels for women in Northern Ireland as well as issues around access to affordable childcare the proposed reductions in the provision of employment support are likely to have disproportionate impacts for women who are likely to need more support getting into work;
- the postponement of the launch of the JobStart programme and other help with childcare costs will have greater impacts for women. Young women have been more impacted by shut downs as a result of the pandemic than young men;
- childcare is a huge issue for women's economic participation and the cost and availability of childcare is a significant issue in Northern Ireland. This must be given a stronger focus in the draft budget and in actions by government departments as it is central to tackling women's disadvantage and gender inequality.

We also believe that there will be a range of adverse equality impacts on ethnicity as a result of the draft budget proposals and suggest that ethnicity is added to the final EQIA. Minority ethnic groups appear to be over-represented in precarious low-grade, low-paid jobs and unemployment is also problematic. It has been acknowledged that people from minority ethnic groups may be at risk of disadvantage and poverty.⁸⁵ These groups can also experience language barriers in access to employment and services. It is therefore evident that those from different racial groups will suffer adverse impacts from reductions in advice

⁸⁵ Poverty and Ethnicity in Northern Ireland an Evidence Review, Joseph Rowntree Foundation, January 2013 <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/poverty-ethnicity-northern-ireland-full.pdf>

provision, increased waiting times for the processing of benefits/changes of circumstances and reductions in employment support.

3. Please state what action you think could be taken to reduce or eliminate any adverse impacts in allocation of the Department's draft budget?

We are very concerned about the adverse impacts of this draft budget particularly for the DfC. Given that DfC has responsibility for anti-poverty and gender 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 that we are currently experiencing with the impact of the pandemic, welfare reform 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.

We refer to section 2.11 which shows that Northern Ireland has had more or less the same budgetary settlement for many years. This coupled with the fact that the UK is a low-spend state compared to other countries means that Northern Ireland is constrained by budgetary inadequacy. As NERI suggests this has implications for our chronically underfunded public services and the ability to provide new supports such as decent social insurance and childcare which are so desperately needed. 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, childcare and measures to tackle inequalities including gender.

We believe that given the current circumstances that priority must be given to the payment of adequate social security benefits to provide a safety net for people in these difficult times. We also believe that it is vital that the current mitigations package is strengthened as a matter of priority (see section 2.4). 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.⁸⁶

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.⁸⁷ We are very much in agreement with these statements as spending on social security benefits is spent and not saved and 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 issues 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,

⁸⁶ 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/>

⁸⁷ Ibid

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 pandemic, 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 2.2). This would ensure that women who have been so impacted by these issues are given targeted help to improve their lives and the lives of their children.

We point to the example of the Covid19 heating payment of how a lack of targeting according to evidenced need resulted in a significant spend by the DfC. We believe that this money could have been better targeted to ensure scarce resource is working as effectively as possible for those in the most need. The Covid19 heating payment is a one-off heating payment of £200 to those in receipt of Pension Credit or certain disability benefits in recognition of the additional costs arising from the pandemic.

However, looking at statistics on poverty levels it is clear that pensioner poverty is lower than working age poverty with 43,000 pensioners living in poverty compared to 201,000 working age people.⁸⁸ Furthermore the number of pensioners living in absolute poverty fell while the figures for working-age, children and individuals rose significantly.

⁸⁸ Poverty Bulletin: Northern Ireland 2018/19, NISRA & DfC
<https://www.communities-ni.gov.uk/system/files/publications/communities/ni-poverty-bulletin-201819.pdf>

Despite this evidence the Covid19 heating payment scheme was targeted at those in receipt of Pension Credit. Pension benefits have been largely protected from welfare reform in the last decade yet significant cuts have been made to the benefits for working-age people and families. In addition, these pensioners would also have received the Winter Fuel Payment.

Those who have faced the greatest financial impacts from the Covid19 pandemic are those of working age who have lost their jobs/livelihoods or suffered reductions in their working hours. Many of these will be women and many will have children. These women and families will also be subject to punitive welfare reform policies such as the two-child limit, the Benefit Cap and the Bedroom Tax. It is clear therefore that this scheme was not appropriately targeted in the context of the pandemic and lessons must be learned to ensure that the scarce resources available are directed to where the need exists.

We also wish to communicate our concern that the draft budget contains no funding allocation for progressing changes to the special rules for terminal illness committed to in New Decade New Approach.⁸⁹ We support the call from our colleagues in Marie Curie NI for the Department of Finance to add these crucial funds in the final budget.

4. Are there any other comments you would like to make in regard to this pro forma or the consultation process generally?

Please see our comments in Section 2.1 about the consultation process. There was insufficient time available to allow for proper or meaningful consultation on this important issue.

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. If the issues highlighted are addressed they could make a real difference to the lives of women,

⁸⁹ Equality Impact Assessment Draft DfC Budget 2021-22, Department for Communities, Para 6.18

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.