



Department for Infrastructure
Clarence Court
10-18 Adelaide Street
Belfast
BT2 8GB

3rd September 2024

Dear Department for Infrastructure,

Due to pressure of time and workload we are unable to complete a full response to the Department's Budget 2024-25 Equality Impact Assessment (EQIA) consultation. We wish to fully endorse the Women's Policy Group (WPG) response (of which we are a member).

Therefore, please accept this letter as the Women's Regional Consortium¹ response highlighting the following concerns and calling on the Department to fully consider the detail of the Women's Policy Group response:

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

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

policies is at the heart of the EQIA process. Equality Commission for NI (ECNI) guidance² states:

Ways of delivering policy aims which have a less adverse effect on the relevant equality category, or which better promote equality of opportunity for the relevant equality category, must in particular be considered. Consideration must be given to whether separate implementation strategies are necessary for the policy to be effective for the relevant group. The following must be considered:

- How does each option further or hinder equality of opportunity?
- How does each option reinforce or challenge stereotypes which constitute or influence equality of opportunity?
- What are the consequences for the group concerned and for the public authority of not adopting an option more favourable to equality of opportunity?
- How will the relevant representative groups be advised of the new or changed policy or service?
- If an economic appraisal is necessary – What are the costs of implementing each option? Will the social and economic benefits to the relevant group of implementing the option outweigh the costs to the public authority or other groups?
- Does the public authority have international obligations which would be breached by, or could be furthered by, each of the options?

It is clear that the Department has not adequately complied with ECNI guidance in relation to considering mitigating measures and alternative policies in its EQIA. We expect to see the final EQIA comply with ECNI guidance, otherwise it is open to a complaint against the Department for breaching the terms of their equality scheme.

- We are concerned about about the Department's budget shortfall of £117m and the proposed options to reduce spending options outlined in the EQIA. It is clear that this means that important areas of work are not being progressed and this is likely to have adverse impacts across the full range of Section 75 groups.
- In terms of the **consideration of available data and research** we are pleased to see that the Department has considered a wide range of data and research including those from the community and voluntary sector. The Department is to be commended for this example which unfortunately has not been replicated in other departmental EQIAs. We particularly welcome the inclusion of the Gender Equality Strategy Expert Advisory Panel report, the

Anti-Poverty Strategy Expert Advisory Panel report, NIRWN and Women's Regional Consortium research.

- We commend the Department on a fairly comprehensive identification of adverse impacts across the range of options to reduce spending plans.
- This consultation was issued on 11th June 2024 with interested parties encouraged to respond by 9th July 2024 to inform the Department's allocation of funds. This leaves just four weeks to respond to this important consultation. While the consultation states a final closing date of 6th September 2024 in reality organisations need to respond by 9th July in order to have any influence over the allocation of funds so therefore this is the de facto date. We suggest that given the nature and importance of this consultation that the deadline should have been longer to enable genuine and meaningful consultation.
- We also note that section 3.13 of the Department's Equality Scheme states that consultation periods should last *"for a minimum of 12 weeks to allow adequate time for groups to consult amongst themselves as part of the process of forming a view."*³
- We refer the Department to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.⁴ 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.
- The EQIA details a significant **reduction in funding for Translink (19.4%)** and rightly identifies that in respect of public transport this will have greater impacts for women than men. Women are less likely to hold a driving licence, have greater dependency on public transport and have more unpaid care responsibilities necessitating more short journeys. A funding cut of this magnitude will have adverse impacts for women's participation in society and public life and especially for rural women.
- **Remove funding for annual programme of footway enhancement on poor footways.** The Travel Survey shows that 24% of all journeys are made by walking in 2021 with statistics showing that women made a slightly higher proportion of journeys on foot (26%) than men (23%). Failing to fund footway enhancement will therefore have a greater impact on women and on people with disabilities as identified in the EQIA.
- **Fund Winter Service to December 2024 and seek additional funding in year.** We would be concerned if the Winter Service was unable to be continued after December 2024 due to limited funds. Taking a gender-neutral approach to decision-making in this area has the potential to adversely impact on women. While men mostly commute to and from work, women often make more shorter journeys to run errands and to provide unpaid care and women are also more likely to make journeys on foot. In Sweden, the city council looked at the data and prioritised ploughing side roads and side walks before roads. This had a big impact reducing the number of people, particularly

³ <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/dfi-equality-scheme.pdf>

⁴ 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

women, admitted to emergency departments. They found that it was less dangerous to drive through a few inches of snow than to walk through the snow.⁵ Older and disabled people are more likely to have limited mobility making it more likely for them to fall on slippery surfaces and it is also disproportionately more likely for them to suffer major injury after a fall.

- Our previous point makes the case for **Gender Budgeting** which has the aim of ensuring that the distribution of resources creates more gender equal outcomes. We support the following statement on Gender Budgeting from our colleagues in the Northern Ireland Women’s Budget Group: *“Gender budgeting is good budgeting; it encourages greater transparency of government processes, more in-depth assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures will create a firewall to prevent such disproportionate disadvantages in future.”*
- **Unrepaired street lighting outages and/or street lighting switched off completely** has greater adverse impacts for women and girls in the context of endemic violence against women and girls. Gender-based violence in public spaces is a barrier to safe mobility and participation in public life for women and girls.
- **Funding of Community Transport remains at the total level provided in 2023- 24.** We welcome the Department’s commitment to protecting Community Transport. While the funding remains for this important service it has not been increased and that essentially means a real terms cut given rising prices. Community Transport does so much to tackle rural poverty and social isolation. It is an intrinsic part of communities complementing the work of other agencies in the development of rural communities and supporting a wide range of community activities. As has been highlighted in the EQIA women tend to use Community Transport services more than men. We believe that Community Transport should therefore have ring-fenced multi-year funding to protect these vital and important services.
- **Remove Climate Action Plan forecast requirements to deliver against draft Climate Action Plan.** Any reduction in progress on actions for climate change will have greater impacts for women. As highlighted by the Women’s Budget Group: *“Although climate change will impact on everyone on the planet, we know it is women who will experience the most acute effects. The climate emergency disproportionately impacts women because on average they are poorer than men, they have less savings, they are less financially resilient, and they often bear the brunt of economic crises compared to men. The climate emergency therefore amplifies and exacerbates existing gender*

⁵ <https://99percentinvisible.org/episode/invisible-women/>

inequalities.”⁶ We are in agreement with our colleagues in the Women’s Budget Group that: “Addressing the climate emergency through a gender lens is crucial for building a fair and sustainable future.”

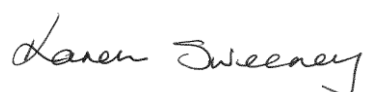
- It is important to recognise the inter-connectedness of the spending cuts outlined in this EQIA. For example, if there are cuts to investment in public transport this will have detrimental impacts on climate change targets. Therefore, each of these proposals cannot be viewed in isolation from the others.
- We welcome the fact that a detailed **Rural Needs Assessment** has been carried out this year (there was no RNA for the 2023-24 Budget EQIA). Many of the reductions in funding outlined in the EQIA will have greater adverse impacts on rural dwellers.

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

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

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

Kind Regards



Karen Sweeney
Director, WSN

⁶ Climate and gender, Briefing for a new government, UK Women’s Budget Group, July 2024
<https://www.wbg.org.uk/wp-content/uploads/2024/07/Climate-and-gender-WBG-Briefing-2024.pdf>