





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

Response to: Draft Budget 2025-26 Consultation

Issued by: Department of Finance
March 2025

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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 of Finance (DoF) Draft Budget 2025-26. The Budget allocation for a number of Government departments most particularly the Department for Communities, Department of Agriculture, Environment and Rural Affairs (DAERA) and the Department of Education is vitally important to the lives of the women, children and families who the Women's Regional Consortium works on behalf of and represents. This funding covers important areas for women including social security, employment advice and support, housing and promoting social inclusion through gender equality, anti-poverty, sexual orientation, disability, child poverty and active ageing, rural support and childcare. 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 of the Cost-of-Living Crisis and the adverse impacts of Brexit all of which gives rise for concern about women's equality and economic wellbeing.
- **1.5** 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 also endorse the response made by the Rural Community Network (RCN). We fully endorse their responses

and urge the Northern Ireland Executive to take their evidence fully into
consideration. We make particular reference to the need for gender budgeting and
the urgent need to address issues of care including childcare and unpaid care which
have significant gendered impacts included in the NIWBG response.

2.0 General Comments

The consultation on the Draft Budget 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.

The Consultation Timeframe

While we welcome having the opportunity to respond to this important consultation we have concerns about the consultation process. While on the face of it, it looks like there was 12 weeks for this consultation process this is not the case. The consultation opened on 19 December and included the Christmas holiday period. Allowances must be made for holiday periods. In order to enable genuine and meaningful consultation the consultation timeframe should be at least 12 working weeks. In addition, respondents had to wait even longer to see the actual budget document shortening further the consultation period. We agree with our WPG colleagues that this is "poor practice and will not lead to a useful consultation exercise."

As the Women's Regional Consortium we want to ensure that women from the most disadvantaged and rural areas of Northern Ireland are given the chance to share their valuable experiences and opinions to help influence and shape the actions of Government. A shorter consultation timeframe severely limits the opportunities to organise engagement with local groups to explain the contents of the consultation, facilitate discussion and meaningfully collect the views of those impacted by its contents. It means that organisations like ourselves have insufficient time to properly consult with affected women so that their views/experiences which are so critical remain outside the process.

This consultation was published alongside a number of other Government consultations which also require detailed responses by the Community and Voluntary sector. The volume of consultations continues to put huge pressure on an already

overstretched and under-resourced sector who are facing significant challenges due to funding cuts, insecure contracts and increased demand for our services.

We refer the Department to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.² 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.

Rural Needs Assessment

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.

We are disappointed to note that the draft budget has not 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.³

 $\underline{https://wrda.net/wpcontent/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf}$

https://www.daera-ni.gov.uk/publications/mid-year-estimates-population-change

² Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017

³ Mid-Year Population Estimates – Urban/Rural Change, NISRA

Mitigating Impacts

We support the call from our NIWBG colleagues which encourages the Department to incorporate guidance from the Equality Commission⁴ on 'Practical Guidance on Equality Impact Assessment' in their analysis and development of the draft Budget and its EQIA. Considering the scope and impacts of the Budget the analysis and mitigation of impacts must be thorough. We particularly point the Department to the consideration of measures which might mitigate any adverse impact and alternative policies which might better achieve the promotion of equality of opportunity:

The consideration of mitigating measures and alternative policies is at the heart of the EQIA process. Different options must be developed which reflect different ways of delivering the policy aims. The consideration of mitigation of adverse impacts is intertwined with the consideration of alternative policies. Mitigation can take the form of lessening the severity of the adverse impact.

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

⁴Equality Commission for Northern Ireland. (2005). Section 75 of the Northern Ireland Act 1998: Practical Guidance on Equality Impact Assessment.

⁽https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance(2005).pdf)

- 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?

Clear evidence of the consideration of the impacts of alternatives must be apparent in the relevant consultation documentation.

International Obligations

Northern Ireland is bound by the international human rights obligations of the UK, as a State Party to all key human rights conventions, including the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). States Parties to human rights conventions accept obligations to put in place legislation and policy implementing provisions in the conventions, and are monitored by the relevant UN expert committees regularly. A common thread throughout the nine core Conventions is that States Parties commit to take action to promote equality across population groups, and this is clearly stated in the International Bill of Rights, which includes the Universal Declaration of Human Rights, as well as the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR).

There is a common thread across the Conventions that States Parties accept obligations to take specific action to promote equality for groups experiencing discrimination. Each of these Conventions sets out specific requirements for States Parties to protect and promote the equality of the focus group in the Convention.:

- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- Convention on the Elimination of All Forms of Racial Discrimination (CERD)
- Convention on the Rights of People with Disabilities (CRPD)
- Convention on the Rights of the Child (UNCRC)
- Convention against Torture and other inhuman, cruel or degrading treatment or punishment (CAT)

- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families
- International Convention for the Protection of All Persons from Enforced
 Disappearance

For example, CEDAW specifically requires States Parties to take action to promote gender equality on issues from equal pay for equal work, equal access to education, social protection and services and equality in family life to equal access to healthcare and strengthening women's role in decision making at all levels. We agree with our colleagues in Women's Platform that it would be very helpful to undertake a full assessment of how provisions in the human rights framework relate to equality law in Northern Ireland, and how these principles can be integrated in modern legislation.

Progressive realisation of rights is a key principle of the international human rights framework, in recognition that implementation is affected by many factors including resourcing, and means that equality can be implemented incrementally, as long as core provisions are achieved. However, this incorporates a complementary principle that existing rights cannot be rolled back or weakened. This is central in the context of equality legislation, as it creates a central principle for a legislative framework.

The full set of recommendations for Northern Ireland and the UK from UN monitoring bodies is extensive running to over 300 recommendations. With regard to women and gender equality, it is relevant to note that the most recent Concluding Observations for the UK express concern that protections for women in Northern Ireland are falling behind those of women elsewhere in the UK, and a key recommendation is "to put protections in Northern Ireland on an equal footing with those in England, Scotland and Wales". The CEDAW Concluding Observations urge in particular for action on violence against women, the gender pay gap and improved representation of women in public life.

The European Convention on Human Rights (ECHR) is a relevant and essential framework for equality law. The ECHR is incorporated within domestic law through

the Human Rights Act 1998, which covers Northern Ireland and provides a clear framework of legal remedies for breaches and violations of rights. It is important that equality law in Northern Ireland is aligned with the ECHR and the Human Rights Act, as the cornerstones of a rights-based legislative system. In this regard, it is notable that the Concluding Observations from CERD find that Northern Ireland is not fully compliant with the Human Rights Act, and recommends in particular that provisions in CERD are fully implemented in equality legislation that sets out a clear definition of racial discrimination.

The ECHR also provides the framework for the European Convention on Action Against Violence Against Women, known as the Istanbul Convention. The Istanbul Convention holds that all state actors are obliged to conform to the requirements of the Convention; key among these are requirements to implement effective legislation to protect women and girls from violence, ensure adequate resourcing for action, and implement gender-sensitive policies. Importantly, the Convention emphasises data collection as the basis of action, and stresses the role of meaningful data in prevention. It also mandates work with men and boys to change cultures, attitudes and behaviours, and provides detailed guidance on the development of judicial systems and responses. The Council of Europe has also recently published guidance on education for prevention under the Istanbul Convention, which emphasises gender equality and non-violent approaches, and provides examples of good practice from a number of countries as well as a checklist for developing national good practice. The Council of Europe undertook a baseline assessment of the UK under the Istanbul Convention in early 2024, and a report is expected in Spring 2025.

Gender Budgeting

The Women's Regional Consortium supports the need for Gender Budgeting and agrees with the following statement from the NI Women's Budget Group on Gender Budgeting:

Gender budgeting requires government departments to analyse the different impact of the budget on people of different genders, starting as early in the budget cycle as possible. The aim of gender budgeting is to ensure that the distribution of resources creates more gender equal outcomes. Over time, gender analysis should become embedded at all stages of the budget process. Women's intersecting identities are also included in this analysis and policy-makers are expected to promote these areas of equality as well. There is widespread political support for gender budgeting in Northern Ireland and a growing evidence base that it can help create a more equal society. In the current budget crisis women will experience particular disadvantages due to the pre-existing socio-economic conditions. For example, there is strong evidence that women have suffered disproportionately from over a decade of Westminster austerity measures, the pandemic, and the cost-of-living crisis⁵. We cannot afford to continue making decisions at the expense of women and risk further degradations to gender equality and additional intersecting equalities as well.

We have had positive engagement with the Department on exploring the place of gender budgeting within the Budget Sustainability plans, as the benefits would help to improve the budgetary process. Gender budgeting is good budgeting; it encourages greater transparency of government processes, more in-depth assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures will create a firewall to prevent such disproportionate disadvantages in future.

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

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⁵ MacDonald, E.M. (2018) The gendered impact of austerity: Cuts are widening the poverty gap between women and men. British Politics and Policy at LSE.

Charlton, E. (2023) This is Why Women are Bearing the Brunt of the Cost of Living Crisis According to Research. World Economic Forum. (https://www.weforum.org/agenda/2023/01/cost-of-living-crisis-women-gender-gap/)

We recognise that the current equality screening and impact assessment duties under Section 75 provide policy infrastructure that could be used to progress gender budgeting. The EQIA process allows space to identify budget impacts on women and opportunities to promote more gender equal outcomes. However, too often the analysis included in these documents focuses only on equal treatment or stops at the point of acknowledging pre-existing inequalities. For gender budgeting to be fully implemented, the next stage must be to reformulate budgets and budgetary policy with targeted measures to improve outcomes for women and girls. Additionally, Section 75 screening and impact assessment typically takes places at the very end of the budget planning process or after the budget has been finalised. The OECD⁶ highlights that best practice for gender budgeting is to embed it at all levels of policyand budget-making: planning, formulation, approval, implementation, monitoring and reformulation. It is crucial that gender equality obligations are not a 'tick-box exercise,' but rather that gender equality is mainstreamed in every area of the budgetary process through gender analysis of data supported by experts from civil society.

A gender budget statement is just one of a suite of tools that can be employed with the implementation of gender budgeting. Published alongside the annual budget, the statement is an opportunity for the Department to highlight where resources were allocated to promote gender and wider equality, as well as note equality gaps and address impacts. Using gender as the foundation for this equality analysis is key, as it helps to facilitate an intersectional approach to analysis as opposed to viewing each equality ground in a silo. In Victoria, a state in southeastern Australia, an annual *Gender Equality Budget Statement* is published alongside the budget. They provide an overall snapshot of how they allocated spend to promote gender equality, and then breakdown the spend – giving the context of the issue, what they are spending, and why they are spending the funds in that way. In the 2024-25 Statement⁷, the following was highlighted:

⁶ OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, (https://doi.org/10.1787/9574ed6f-en).

https://s3.ap-southeast-2.amazonaws.com/budgetfiles202425.budget.vic.gov.au/2024-25+State+Budget+-+Gender+Equality+Budget+Statement.pdf

- More than 130 Budget initiatives were assessed as having a positive impact on gender equality. Nine initiatives were identified as having a significantly positive impact, with a total investment of \$352 million.
- \$657 million for services including addressing the 'pain gap' in women's health.
- \$1.8 billion to increase women's economic security by supporting workers in women-dominated sectors and helping women to reskill and retrain.
- \$292 million to assist with cost of living pressures that disproportionately affect women.
- \$216 million to support Victorians experiencing homelessness into housing, including women.
- \$269 million to prevent family violence and support women's safety.

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

3.0 Specific Questions

1. Do you agree with the prioritisation of funding within the 2025-26 draft Budget document?

We agree with our WPG colleagues that it is difficult to respond to this question. It is unclear what has been prioritised in the Budget document unless this question refers to the ring fenced funding, much of which refers to ongoing projects and work already underway rather than a specific, identifiable funding priority.

We stress the need for the prioritisation of funding to be informed by the agreed Programme for Government (PfG) and agree with this statement from the NIWBG about the link between the Budget and the PfG:

According to The Organisation for Economic Cooperation and Development (OECD), aligning the annual budget with strategic policy goals and priorities is key to good budgeting⁸. For the first time in many years, we've not only had a Programme for Government (PfG) but a draft version of the over-arching policy was published *ahead* of the draft Budget 2025-26. It is positive to see some reference to the PfG in the consultation document. However, the PfG and the Budget should be sister documents – completely intertwined, with the priorities of the PfG being the priorities of the Budget.

Unfortunately, it seemed like some of the priorities of the PfG were footnotes in the Budget. For example, only £2 million of funding is attached to the Ending Violence Against Women and Girls (EVAWG) Strategy, and most of that money was already announced and allocated at the start of the year. It is noted in the draft Budget that, "General allocations to departments should also contribute to PfG and work is underway to ascertain how proposed departmental spending will align with PfG priorities, missions and wellbeing domains." While we can hope that there are clearer linkages between departmental budgets and the PfG priorities, it is deeply

⁸ OECD (2019). OECD Good Practices for Performance Budgeting (<u>https://www.oecd.org/en/publications/oecd-good-practices-forperformance-budgeting_c90b0305-en.html</u>)

frustrating that consultees are not able to feed into that part of the budgeting process.

The Women's Regional Consortium response to the draft PfG⁹ highlighted a number of areas that we strongly felt should have been afforded more priority within the PfG namely the need to address poverty and unpaid care both of which have gendered impacts. We also wanted to see the PfG address the need for increased investment in community education to help address persistently high levels of economic inactivity in Northern Ireland particularly for women. We are disappointed that these areas have not been given priority in the final PfG and therefore will not attract the same priority in terms of financing.

2. What services should be prioritised in the 2025-26 Budget?

We are concerned about this question as it is subjective in nature. What is a priority for one person/organisation may not be a priority for another. Every person and organisation will have priority issues some of which may be in competition with each other. We agree with the WPG who have concerns about how this question will generate useful feedback as it will inevitably pit some pieces of work against others.

We also agree with the WPG that as a general point the budget and resources should be targeted at areas that can advance equality across departments. This would help to ensure the efficient use of public resources. In future it would be useful if the Department of Finance could request that departments outline their spending plans in more detail than is provided in the consultation and in good time so that respondents can see more clearly whether or not the spending is targeted in the right way. This would help to provide constructive feedback rather than a list of personal preferences that this question seems to be inviting.

3. Are there services that no longer need to be delivered or can be reduced in 2025-26?

⁹ https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/11/Womens-Regional-Consortium-Response-to-draft-PfG-Our-Plan.pdf

Once again, we are concerned about the subjective nature of this question and would go so far as it say that it is dangerous to ask it in this way. We point to the WPG answer to this question which states that there are some functions of Government that some people do not value regardless of what they provide to society and others that will divide opinion. The WPG gives the example of the Ending Violence Against Women and Girls Strategy where some people object to funding it in principle as they simply do not care about the issue of VAWG. If there is the suggestion that some services could be stopped or reduced on the basis of the responses to this question then this is concerning.

4. Do service charges need to be considered for some services?

Alongside our colleagues in the WPG we are concerned about this question as the only mention of service charges is in the question itself. The consultation document does not include an explanation of what is meant by service charges leaving it difficult to make an informed answer to this question. There needs to be clarity over what the department is referring to by service charges as this leaves it difficult to answer especially for members of the public who may not be as familiar with these issues.

If this question is referring to revenue raising measures we repeat our opposition to the introduction of revenue raising measures as outlined in our consultation response to this issue in January 2024. For many people in Northern Ireland, particularly those on the lowest incomes, there is simply no capacity to pay any additional charges no matter where they are introduced. Proposals for the introduction of charges/fees fail to take account of the environment in which we are living after a decade of welfare reform and austerity changes closely followed by a global pandemic and now an ongoing Cost of Living Crisis. These have all had greater impacts on those on the lowest incomes and it is hard to see how many people will be able to afford to pay for any additional expense given the increased pressures on their incomes.

¹⁰ https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/01/Womens-Regional-Consortium-Response-to-Financial-Context-for-Revenue-Raising-Consultations.pdf

An ARK Research update¹¹ has highlighted some issues from the Northern Ireland Life and Times Survey which point to likely problems meeting any additional expenditure from low income levels. It found that around 25% of households could not afford to pay an unexpected £500 bill. The research paper suggests that this should not be a surprise given that the Family Resources Survey 2019-20 found that 36% of households have no savings. Responses to the question "Did your household turn heating down or off because you could not afford the costs last winter, even though it was too cold in the house/flat?" reveal a concerning situation for low income households. Even in Winter 2020, before the soaring costs of energy and while Universal Credit claimants received a £20 a week uplift, over half of respondents (52.1%) who described themselves as low income had turned the heating down or off because they could not afford it.

Women's Ability to Pay for Proposed Charges

Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work, more likely to be providing care either for children or other family members which limits their ability to carry out paid work and more likely to have to make up for cuts to public services through unpaid work. All these factors contribute to keeping women's incomes generally lower over their lifetimes and therefore puts them at greater risk of living on a low-income and in poverty.

These existing gender inequalities have been worsened by a decade of welfare reform and austerity policies that have hit women harder¹² and now the Cost-of-Living Crisis is compounding the worsening situation for women. 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

¹¹ The Other Division in Northern Ireland: public attitudes to poverty, economic hardship and social security, ARK Research Update Number 146, May 2022 https://www.ark.ac.uk/ARK/sites/default/files/2022-05/update146.pdf

¹² 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

absorbers' of poverty going without food, heat or clothes in order to meet the needs of children and/or other family members when money is tight.¹³

Women's Regional Consortium and Ulster University research with 250 women in Northern Ireland on the impact of the Cost-of-Living Crisis on their lives¹⁴ showed clearly the impact of this economic crisis on women. The findings from this research paint a stark picture of women's lives which are increasingly occupied with hunger, cold, debt, anxiety and concerns about the outlook for themselves and their children:

- 91% of the women reported difficulty paying their bills as a result of cost-ofliving increases.
- The price increases reported as having the biggest impact on women's household budgets were increases in energy bills (90%) and increases in food bills (89%).
- Just over half of the women reported being in debt (56%) and of these 82%
 reported they had to borrow as a result of cost-of-living increases.
- 62% of the women reported they had been unable to save recently and 31% reported their savings had decreased. None of the women reported they had been able to increase their savings.
- 78% of the women had felt cold or hungry or both as a result of cost-of-living increases.
- 41% of the women had needed to use a foodbank/other charitable support due to increases in the cost of living.
- Many of the women were skipping meals, living in cold homes and going without other necessities such as clothing to protect their children and families from financial hardship and poverty.

https://fabians.org.uk/a-female-face/

¹³ A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women's Budget Group, February 2019

Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023

https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf

This research shows that many women in deprived and rural areas of Northern Ireland can least afford to pay any additional charges. As we have highlighted they are struggling to meet their most essential bills including for food and energy. They would be therefore hardest hit by any revenue raising measures. Introducing these measures would therefore only serve to deepen existing levels of poverty and drag even more women, children and families into poverty.

We also wish to raise the issue of rural poverty which is of concern in a Northern Ireland context where we have a significant rural population. To consider bringing in service charges during a Cost-of-Living Crisis, where there is no Anti-Poverty Strategy in place will have even greater impacts for rural areas. Rural dwellers suffer from access poverty in relation to a range of services and many are struggling to make ends meet especially for the most basic items like food and energy. A lack of access to public transport and the costs of transport lead to additional problems for those in rural areas adding to the costs of the most basic of items. Rural dwellers have less choice/ability to shop around for cheaper items and in relation to energy costs 62% of households in Northern Ireland rely on unregulated home heating oil and most of these are rural households.

Finally, we point to the report from the UK Women's Budget Group (UKWBG) to HM Treasury. This research found that free, universal childcare would create more jobs and as a result, generate additional tax revenue. Furthermore, it would alleviate the responsibility of childcare on mothers and would allow those who left the labour market for childcare reasons to return to the paid economy. We reiterate the call from the Women's Budget Group Commission for a Gender-Equal Economy for investment in A Caring Economy. Investing in the care sector is an important way of addressing the impending jobs crisis, as well as taking steps towards gender equality, wellbeing

WBG-Budget-2020-FINAL.pdf

¹⁵ Budget Representation to HM Treasury: Invest in Social Infrastructure, Women's Budget Group, February 2020

¹⁶ Ibid

¹⁷ Creating a Caring Economy: A Call to Action, Commission on a Gender-Equal Economy, September 2020

WBG Commission on a Gender-Equal Economy - Womens Budget Group

and sustainability. Recent research has shown that investment of 1% of GDP in the care sector would produce 2.7 times as many jobs in the economy overall as an equivalent investment in construction.¹⁸

5. Please respond to the following statement: Public sector pay should be prioritised.

We are not providing an answer to this question the way it is currently framed. The way it is framed is unhelpful and like our WPG colleagues we agree that many people may be in support of the need for increases in public sector pay but perhaps not at the expense of other vital services. The question does not tell respondents what may need to be sacrificed in terms of services to prioritise public sector pay. We share the WPG concerns that in the online consultation the answer to this question is by tick box only which allows no room to express nuance despite the context of this being incredibly important. We agree with the WPG who have highlighted that it is unorthodox to ask about a policy priority within a budget. The budget is set to fund the priorities agreed in the Programme for Government, not the other way around.

We also take this opportunity to raise the issue about pay in the Community and Voluntary Sector (CVS). The sector is continuing to sustain communities and address inequalities and often is best placed to reach those who are the most marginalised in our society yet there is no priority in budgets for this work. The sector is enabling social change and preventing the inequalities and hardships that have resulted from previous tight budgets and austerity policies. In many areas the sector is standing in the gap helping people including some of the most vulnerable and marginalised in our society from negative impacts in a range of areas.

NICVA research has found that 49% of organisations in the sector have reported recruitment difficulties due to uncompetitive salaries compared to other sectors, short-term funding, and staff burnout driven by increased service demand.¹⁹ The

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¹⁸ Ibid

¹⁹ https://www.nicva.org/article/nicva-launches-2024-voluntary-and-community-sector-workforce-report

Women's Regional Consortium agrees with NICVA who are calling for immediate structural reforms to address these challenges, including stable, long-term funding. Government contracts must ensure that people are paid the Living Wage so that those working so hard in the CVS have sufficient income to meet their bills and afford a decent standard of living.

6. Have you any other views?

As outlined we are concerned about the quality of this consultation given the way some of the questions have been asked as these are not likely to result in useful feedback.

We are also concerned about the short time frame for analysis of responses to the consultation given that this is such an important issue. This can lead to the impression that the Budget is effectively agreed at this stage and that the consultation is more of a tick box exercise.

We note and welcome the fact that the Department has attempted a cumulative EQIA. We share the concerns of the WPG that the EQIA is not sufficient. While we recognise that the Department is basing this on the information made available to them much of it is incomplete leading to a poor quality EQIA. As we have outlined in Section 2 we agree with the NIWBG and WPG that the Department should publish a gender budget statement looking at all equality measures through a gendered lens.

We are concerned about the end of the Restoration Package and the resulting cliff edge which will result.

We are disappointed that no RNIA has been carried out for the draft Budget as outlined in Section 2 of this response and agree with our colleagues in RCN who have stated: "Whilst we appreciate that individual departments will carry out RNIAs as part of their individual budget consultations, an overarching RNIA would have been usual to disaggregate down if the budget is giving due regard to rural needs as a whole of government document."

We fully support the statements made by the NIWBG in relation to **Care and Economic Inactivity** as follows:

One of the key issues identified in the draft Budget 2025-26 was the fact that the labour market is tight. Currently, we face the problem of the lowest unemployment rate of the 12 UK regions paired with the fourth lowest employment rate and the highest economic inactivity rate at 28.5%²⁰. This issue was referenced a number of times at the outset of the consultation, setting the context for further issues around productivity and economic prosperity and how this impacts on the wider financial situation in Northern Ireland.

Despite references to the increasing level of long-term sickness amongst 16-64 yearolds contributing to higher rates of economic inactivity, the Department failed to acknowledge the role that unpaid caring plays in keeping people, particularly women, out of work. While long-term sickness was the most popular reason women gave for being economically inactive, one in four (25%) of women said that family/home responsibilities was the reason for their economic inactivity – family/home responsibilities was the least common reason given by men²¹.

The gendered nature of unpaid care is clear and it is facilitated by unaffordable, inaccessible childcare and crises within the social care system. According to the Employers for Childcare *Northern Ireland Childcare Survey 2023*, 88% of parents said they had to change their working arrangements due to the cost of childcare²². Additionally, 95% of parents cited 'childcare stress' as impacting on their work productivity²³.

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 $[\]frac{https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/regionallabourmarket/october2024#:~:text=In%20June%20to%20August%202024,Ireland%20 (28.5%25)%20and%20the$

²¹ <u>https://datavis.nisra.gov.uk/economy-and-labour-market/women-in-northern-ireland-2023.html</u>

²² https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2023/

²³ https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2023/

While lack of childcare provision impacts on women's ability to get into work, the majority of people who work in childcare, a sector that is low-paid and precarious, are women²⁴. The £50 million funding commitment to the Childcare Strategy is a positive change from the zero-investment received in the past. However, it is unclear how these funds will be utilised to benefit both childcare users and workers.

A similar crisis is unfolding in the area of adult social care. The responsibility of providing unpaid care for sick or disabled adults typically falls on women. Women have a 70% chance of providing unpaid care in their adult life and are more likely to care early in their life, with many becoming carers whilst still at working age. By the time they are aged 46, half of women have been an unpaid carer; men have the same 50/50 chance by age 57, 11 years later.²⁵ Research from CarersNI shows that unpaid carers save the government £5.8 billion in care costs ever year²⁶, yet 75% of carers in employment said they are struggling to juggle paid work and care²⁷. Furthermore, 27% of carers said they had to reduce their hours, 14% said they had to take on lower paid and/or more junior roles to balance care, and 29% said they had to leave work altogether²⁸. There is no mistaking the economic contribution of unpaid carers, yet the undervaluing of this contribution and the lack of action to improve work-care-life balance for unpaid carers directly feeds into Northern Ireland's high rate of economic inactivity.

At the moment, one in six people in Northern Ireland are over the age of 65 – this is meant to increase to one in five by 2030 and to one in four by 2040²⁹. The NHS is already under an extreme amount of pressure and relies on unpaid carers as the system alone could not manage the amount of people that require care. An

²⁴ https://www.education-

ni.gov.uk/sites/default/files/publications/education/RSM%20%282023%29%20DE%20Review%20of% 20Childcare%20Services%20in%20NI%20-%20Final%20Report.PDF

²⁵ https://www.carersuk.org/media/warllcph/carersrightsdaynov19final-2.pdf

https://www.carersuk.org/reports/the-economic-value-of-unpaid-care-in-northern-ireland/#:~:text=People%20providing%20unpaid%20care%20for,%C2%A30.7%20million%20per%20hour.

²⁷ https://www.carersuk.org/media/fr5fixqo/state-of-caring-ni-2024-finances-employment.pdf lbid.

https://copni.org/news/articles/the-commissioner-for-older-people-and-age-ni-call-for-northern-irelands-ageing-population-to-be-prioritised-in-programme-for-government#:~:text=One%20in%20six%20people%20in,one%20in%20four%20by%202040.

imbalance of those who need care to those who provide care would add significant pressures to the health system, creating a dangerous environment for those working in and using the health and social care system.

Like the childcare sector, the social care workers are predominantly women, and the sector is low-paid and precarious. The crises in both care systems, which will likely get worse with inaction, massively contributes to high economic inactivity and low employment despite low unemployment. Therefore, it is greatly disappointing that this was not recognised by the Department as a funding priority. Even £50 million for the Childcare Strategy won't go far without ring-fenced funding aimed at increasing development and investment in skills associated with care.

The NIWBG recommends that career pathways and pay progression are put in place for low-paid, precarious work like care, and that funding is increased for apprenticeships that are considered highly skilled yet require low-level qualifications, such as social care apprenticeships. Additionally, Women's Centres and community centres must be included in funding arrangements aimed at reducing economic inactivity, as they are supportive lifelong learning environments, based in and trusted by local communities, offer childcare, and reach the most marginalised women³⁰.

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³⁰ <u>https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/12/Women-Skills-Barriers-to-Work-1.pdf</u>