



25 March 2022

Dear Stakeholder,

## **Draft DFC Section 75 Audit of Inequalities – Engagement**

The Department for Communities (DFC) is undertaking an Audit of Section 75 Inequalities. The aims of an Audit are to identify key inequalities that exist for Section 75 categories among our service users and those affected by our policies and identify the areas where we may be able to take steps to better promote Equality of Opportunity among the relevant Section 75 categories.

We recognise the importance of engagement in all aspects of the implementation of our statutory equality duties. It is important therefore that the Audit is shaped and developed with input from key stakeholders.

As one of our key stakeholders, the Department is keen to hear your views on the Draft Audit and to receive any additional relevant evidence, information and research that we may not have considered.

We have included a template for completion at the end of the Draft Audit and details of how to return your comments to the Equality Unit. If you wish to discuss any aspect of the Audit please get in touch with the team.



It is important that we get our Audit right as it will inform the development of the Department's 2<sup>nd</sup> Section 75 Equality Action Plan, which will seek to address inequalities identified among the Section 75 categories.

If you wish to receive a copy of the Draft Audit in an alternative format please get in touch. Contact details are provided below.

Following this engagement stage the Department will finalise the Draft Audit and start work to develop a Section 75 Action Plan which will be subject to public consultation later in the year.

Please return any comments by **Friday 06 May 2022** to  
[equality.unit@communities-ni.gov.uk](mailto:equality.unit@communities-ni.gov.uk)

Your assistance is very much appreciated.

Kind regards,

**DfC Equality Unit**

**Contact**

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## Response template

### Confidentiality of Information

The Department for Communities processes personal data in accordance with the General Data Protection Regulation and in most circumstances this means that personal data will not be disclosed to third parties.

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1. Do you agree with the key inequalities among Section 75 categories that have been identified in the Draft Audit?

Yes/No

**No**

2. Are there any key Section 75 inequalities not identified that you feel should be included? If so, please outline the inequalities and provide supporting evidence below.

There is additional evidence of inequalities faced by women that has not been included in this audit of inequalities. In particular, there is vast evidence from the Women's Policy Group Feminist Recovery Plan which should have been included in this audit, particularly as we have prepared several briefings and summaries for the Department for Communities including:

- [WPG COVID-19 Feminist Recovery Plan Relaunch: One Year On](#)
- [WPG COVID-19 Feminist Recovery Plan - Summary of Recommendations](#)
- [WPG COVID-19 Feminist Recovery Plan Executive Summary](#)
- [WPG COVID-19 Feminist Recovery Plan Relaunch - Putting Women's Voices at the Core \(includes research with 150+ women\)](#)
- [WPG Violence Against Women and Girls Research \(includes research with 1000+ women in NI\)](#)
- [WPG Feminist Recovery Plan Briefing for Committee for Communities](#)
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- [WPG Carers Key Briefing](#)
- [WPG Gender Based Violence Key Briefing](#)



The WPG conducted research with 150+ women across Northern Ireland for the WPG Feminist Recovery Plan relaunch. Within the quantitative research, we found that:

- 82.1% of respondents said that their mental health had declined during the pandemic,
- 57.9% of respondents said that their mental health had declined during the pandemic,
- 65/4% suffered financially either with less savings, increased debt or struggling to pay bills,
- 65/8% of rural women stated that they struggled with unstable internet connection,
- 81.1% of respondents who designated as carers said that their caring responsibilities had increased during the pandemic,
- 58.4% of respondents had experienced either one or multiple of the following: domestic abuse, stalking, harassment, hate crime and assault
- 92.3% of respondents who attended school in Northern Ireland said they did not feel they had received an adequate relationships and sexuality education (RSE)
- 98.5% of respondents said that they would or might support the introduction of a Bill of Rights for Northern Ireland
- 50% of respondents from an ethnic minority community said that they had experienced issues in attempting to access health services

It is crucial that research and evidence from the women's sector is included when undertaking any audit of inequalities, particularly as this evidence has been summarised for the Department for Communities on several occasions.



In relation to the audit of inequalities specifically, we would like to add the following comments:

- **Work and Health:**

It is shocking that women were not included here as a potential inequality and S75 group impacted, particularly given our research that found that 82.1% of women's mental health declined during the pandemic, 57.9% of women's physical health declined and 81.1% of women's caring responsibilities declined.

In addition, throughout the Feminist Recovery Plan and the Gender Equality Strategy Expert Advisory Panel Report, there is vast evidence of inequalities women face in relation to employment that must be accounted for within this.

For instance, pre-pandemic:

- over 30% of women are considered "economically inactive", which the number one reason for this being due to "family and home commitments" which is the least common reason for me,
- women accounted for 82% of all part-time workers (often in low-paid and precarious work),
- women accounted for 79% of the HSC workforce,
- women accounted for 79% of all workers ineligible for Statutory Sick Pay and much more.

The Gender Equality Strategy Expert Advisory Panel report also provided significant detail on the gender pay gap, which DfC has responsibility for, and it is extremely disappointing that it was excluded from this audit. Further, pregnancy and maternity discrimination continues to be the [largest single category of sex discrimination complaints in Northern Ireland](#), yet this has not been mentioned.

Across the Gender Equality Strategy Expert Advisory Panel Report and the WPG Feminist Recovery Plan, there is vast evidence of the economic inequalities women face and evidence of the need for a women's employment strategy.



- **Supporting People:**

Under this strategic cross-cutting theme, we appreciate that anti-poverty is included but would argue that Gender Equality should also be a cross-cutting theme, particularly given the vast amount of evidence in the Gender Equality Strategy Expert Advisory Panel report and the previously mentioned women's sector resources.

Further, whilst it is referenced that 'women may experience barriers to employment and participation', it should also be noted that women are the "shock absorbers" of children's poverty and that 92% of single parents in NI are women, that women overwhelmingly carry out caring responsibilities (both paid and unpaid), that older women face greater levels of poverty compared to men, and that disabled women earn 22.1% less than able-bodied men and 11% less than disabled men.

To us, simply stating that "women *may* experience barriers to employment and economic participation" does not go far enough - as it is a fact that over 30% of women in Northern Ireland are considered "economically inactive" and cannot enter the formal labour market due to "family and home commitments" which is the least common reason for men's economic inactivity (NISRA). In addition, for women within the workforce, it is known that sex discrimination (particularly in relation to pregnancy, maternity and sexual harassment) are still prevalent across Northern Ireland, as acknowledged by the [Equality Commission](#).

Further, when listing research under this theme, it is disappointing that no gender-specific research has been included.



- **Engaged Communities:**

Under **Infrastructure Planning and Delivery**, women should also be included here as they rely more on public transport and also undertake a disproportionate amount of caring responsibilities.

Under **sport**, it is good to see reference to women participating in sport at lower levels, but it is disappointing that no specific research on women and sport has been included here. There is a wealth of research on women and sport that should also be included.

Under **historic environment** there should also be reference to women, as women rely more on public transport than men and undertake a disproportionate amount of childcare and caring responsibilities which can make historic environments inaccessible.

Under **financial wellbeing**, it is good to see reference to the fact that women face inequalities in financial wellbeing and reference to the 'Making Ends Meet' report. However, there is much more evidence available here that should be considered from the Women's Regional Consortium and the Women's Policy Group, which has been highlighted previously.

Under **T:BUC Uniting Communities** women should also be included here due to the vast cuts towards the women's sector, particularly in relation to good relations and adult education and training programmes.

Under **People and Place Strategy is delivered through the Neighbourhood Renewal, Areas at Risk and Small Pockets of Deprivation programmes**, again the same comments as raised previously:

*whilst it is referenced that 'women may experience barriers to employment and participation', it should also be noted that women are the "shock absorbers" or children's poverty and that 92% of single parents in NI are women, that women overwhelmingly carry out caring responsibilities (both paid and unpaid), that older women face greater levels of poverty compared to men, and that disabled*





*women earn 22.1% less than able-bodied men and 11% less than disabled men.*

*To us, simply stating that “women may experience barriers to employment and economic participation” does not go far enough - as it is a fact that over 30% of women in Northern Ireland are considered “economically inactive” and cannot enter the formal labour market due to “family and home commitments” which is the least common reason for men’s economic inactivity (NISRA).*

*Further, when listing research under this theme, it is disappointing that no gender-specific research has been included.*

In addition, it is crucial that the additional barriers and discrimination that ethnic minority women is included in line with the need for greater understandings of intersectionality and the multiple levels of inequalities women face.

Under **Community Empowerment**, we agree with the inclusion of the under-representation of women in community development and leadership roles in public decision making. WRDA has produced various reports in relation to this which should be included with the research:

- [WRDA Putting Women at the Heart of Public Consultations](#)
- [WRDA - Gender Inequality in Northern Ireland: Where are we in 2020?](#)
- WPG Feminist Recovery Plan Relaunch One Year On (included specific recommendations in relation to addressing this issue).

We are also concerned that the [Gender Equality Strategy Expert Advisory Panel Report](#) is not included within the research for this section, or throughout this audit. This was led by DfC and it is disheartening to see this evidence not being used, particularly when discussing research relating to women’s inequality.



- **Housing, Urban Regeneration & Local Government**

Under **Supporting People Policy**, women should be included here too particularly given the high levels of economic inequality and the disproportionate level of childcare and caring responsibilities women face.

Under research, we would recommend again the inclusion of:

- The WPG Feminist Recovery Plan (as there is vast evidence relating to health, violence against women and much more),
- the WPG VAWG report with evidence from 1000+ women,
- The WPG Feminist Recovery Plan Health Pillar Summary for the Department of Health,
- The WPG Feminist Recovery Plan Culture Pillar Summary for the Department of Justice,
- As before, the Gender Equality Strategy Expert Advisory Panel Report should also be included here.

Under the **Housing Strategy**, we welcome the recognition that women-led households are smaller homes, more commonly rented and living in higher levels of poverty. In addition, we welcome the recognition that older women more frequently live in poor housing conditions. We would suggest that this section also recognises the poor housing conditions for ethnic minority women and refugee and asylum seeker women, particularly in the North-West. We welcome the more intersectional analysis of age, religion, ethnicity, dependents, marital group etc. and would like to note that when examining these additional protected characteristics, women almost always are facing the greatest levels of inequality within these cohorts.



Again, the Anti-Poverty Expert Advisory Panel Report as well as the LGBTQI+ Strategy Expert Advisory Panel Report have been referenced but **there is no reference to the Gender Equality Strategy Expert Advisory Panel Report, which contains a vast amount of evidence in relation to women's poverty. It is extremely disappointing that the DfC has consistently overlooked this report.**

- **Strategic Policy & Professional Services**

Under the **Executive Social Inclusion Strategies**, it is again extremely disappointing to see how scarce the data and research is for women; especially as the Gender Equality Strategy Expert Advisory Panel Report was by far the most detailed and largest report; given the vast evidence of gender inequality that women face across every sphere of Northern Ireland.

Women's inequality goes far beyond the four points raised in this section, and we have provided a detailed list of additional evidence that DfC should be promoting as key research on this point.

**It is very disappointing to see consistently that women's inequality, and the vast amount of evidence of this, has been left out of this audit and we urge the DfC to analyse the research highlighted throughout this response and update this audit accordingly.**

Again - **the Gender Equality strategy Expert Advisory Panel Report has been left out here (which is the only social inclusion strategy expert report to be excluded).** Why is this the case?

Under **public appointments**, we would recommend incorporating the research from the WPG Feminist Recovery Plan on women's representation in politics, public life and peacebuilding.



Under **health transformation project** we would recommend referencing that women and pregnant people still need to travel outside of Northern Ireland to access reproductive healthcare. Further, NI is further behind with perinatal mental health services and equal access to IVF treatments.

The WPG Feminist Recovery Plan has a vast amount of data on women's health outcomes and there is significant evidence on health in the Gender Equality Strategy Expert Advisory Panel Report that should be included.

3. Are there any key inequalities among Section 75 categories identified in the Draft Audit which you feel should be excluded? If so, please outline these and provide evidence below.

No



#### 4. Any other general comments you wish to make?

The women's sector consistently produces additional evidence and data of women's inequalities in Northern Ireland and should be considered within this audit of inequalities alongside other evidence used. This includes:

- [WPG COVID-19 Feminist Recovery Plan Relaunch: One Year On](#)
- [WPG COVID-19 Feminist Recovery Plan - Summary of Recommendations](#)
- [WPG COVID-19 Feminist Recovery Plan Executive Summary](#)
- [WPG COVID-19 Feminist Recovery Plan Relaunch - Putting Women's Voices at the Core \(includes research with 150+ women\)](#)
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- [WPG Women's Workers' Rights Briefing](#)
- [WPG Carers Key Briefing](#)
- [WPG Gender Based Violence Key Briefing](#)
- [WRDA Disabled Women and Discrimination: Facts We Need You to Know](#)
- [WRDA Women at the Cutting Edge Report: The Impact of Spending Cuts on Women's Community & Voluntary Organisations in Northern Ireland](#)
- Women's Regional Consortium Reports including:
  - [The Impact of Universal Credit on Women.](#)
  - [Making Ends Meet - Women's Perspectives on Access to Lending](#)
  - [The Impact of Ongoing Austerity: Women's Perspectives](#)
- [Northern Ireland Rural Women's Network - Rural Voices Research Report](#)



There is also further evidence from the women's sector and broader voluntary and community sector that should be included and accounted for within this audit of inequalities including, but not limited to:

- [Employers for Childcare Annual Childcare Survey Report 2021](#)
- [Irish Congress of Trade Unions Childcare Report 2020](#)

In addition, there are many intersectional inequalities that women face which should be considered cross cutting. For instance, the disproportionate levels of poverty women face and additional barriers and discrimination that women who are disabled, LGBTQ+, rural, travellers, ethnic minorities, migrants, from low-socioeconomic backgrounds and more.

The Gender Equality Strategy Expert Advisory Panel Report highlights how women face additional discrimination and require further action and focus across all social inclusion strategies. Actions on poverty, disability, LGBTQ+ equality and racial equality cannot ignore the distinct and intersectional experiences of women.

It is extremely disappointing that it was consistently left out of this audit, when all other social inclusion strategy expert panel reports were included. DfC must rectify this.

Thank you for completing this proforma.

Please return your completed proforma to

[Equality.unit@communities-ni.gov.uk](mailto:Equality.unit@communities-ni.gov.uk) on or before 06 May 2022