

Women's **Policy Group NI**

WPG NI Response to The Department for the Economy's Spending Plans for 2023–2024 Equality Impact Assessment

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1. Introduction:

The Women's Policy Group (WPG) is a group of policy experts and practitioners who advocate collectively for women and girls by promoting gender equality through an intersectional feminist lens. We challenge systemic injustice and discrimination affecting women and girls by informing society and influencing policy and law. Our work is informed by women and girls' lived experiences and rooted in international human rights law.

The WPG is made up of women from trade unions, grassroots women's organisations, women's networks, feminist campaigning organisations, LGBTQ+ organisations, migrant groups, support service providers, NGOs, human rights and equality organisations and individuals. Over the years this important network has ensured there is good communication between politicians, policy makers and women's organisations on the ground. The WPG is endorsed as a coalition of expert voices that advocates for women in Northern Ireland on a policy level.

Please note that this response also includes evidence from other WPG work, compiled by a range of WPG members, and not all member organisations have specific policy positions on all the areas covered in this response. If you have any questions or queries about this response, or would like to discuss this evidence further with the WPG, please contact Elaine Crory, Women's Sector Lobbyist at elaine.croory@wrda.net

The following WPG member organisations were involved in drafting this response:

- Women's Resource and Development Agency
- Women's Platform
- The Rainbow Project
- The Northern Ireland Women's Budget Group
- UNISON

1.1 Endorsements

We would like to endorse the responses made to this consultation by the Northern Ireland Women's Budget Group.

1. Past Consultations Responses, Evidence Submissions and Briefings:

The WPG has published a wide range of evidence including various evidence submissions, public consultation responses and specific briefings on issues relating to the gendered impacts of budgets. For example, the following documents have been produced by the WPG and member organisations in recent years which highlight these specific impacts.

- WPG NI COVID-19 Feminist Recovery Plan (2021)¹
- WPG Letter to Secretary of State regarding budget cuts (2023)²
- WPG Response to DfE 10X Performance Management Framework (2022)³
- WPG Letter to Executive Ministers regarding Welfare Mitigations and Spending Cuts (2021)⁴
- WPG Briefing on Capital Investment and Investment Strategy Northern Ireland (2021)⁵
- Women's Budget Group response to Consultation on draft Programme for Government Outcomes Framework 2021
- Women's Budget Group response to Consultation on 2021-2022 Draft Budget

1. General Comments on the Department for the Economy's Spending Plans for 2023-2024 Equality Impact Assessment

We are acutely aware that the budget presented here, and the proposed cuts, come from a situation not of the Department's making. We are aware that this is a challenging time and that no Ministers are in place to make decisions on what is a very constrained budget imposed by the Secretary of State. With all of this said, there are serious repercussions for the people the WPG represent - primarily women in all their variance - as a consequence of these choices, and as such it is incumbent on us to highlight these.

Gender Inequality is a reality in our society and progress to address this is slow. This is at least partially because of a deeply embedded and deeply conservative approach to budgeting and policy making that insists upon a gender neutral approach. This approach again and again makes choices that disproportionately harms women but fails to recognise the gendered nature of these choices because men are also impacted - failing to recognise that the disproportionate nature of the harm is not a coincidence, not an accident, but due to a failure to take into account the reality of the gendered economy and society we live in. For example, almost all savings made by the series of policies known collectively as austerity were made at the expense of women and their

¹ WPG NI COVID-19 Feminist Recovery Plan (2021) Available at: <https://wrda.net/wp-content/uploads/2021/07/WPG-COVID-19-Feminist-Recovery-Plan-Relaunch-One-Year-On.pdf>

² WPG Letter to Secretary of State regarding budget cuts (2023) Available at: <https://wrda.net/wp-content/uploads/2023/05/WPG-letter-to-SoS-re-budget-cuts.pdf>

³ WPG Response to DfE 10X Performance Management Framework (2022) Available at: <https://wrda.net/wp-content/uploads/2022/10/WPG-Response-to-DfE-10X-Performance-Management-Framework.pdf>

⁴ WPG Letter to Executive Ministers regarding Welfare Mitigations and Spending Cuts (2021) Available at: <https://wrda.net/wp-content/uploads/2021/08/WPG-Letter-to-Executive-Ministers-Welfare-Reform-Mitigations-August-2021-1.pdf>

⁵ WPG Briefing on Capital Investment and Investment Strategy Northern Ireland (2021) Available at: <https://wrda.net/wp-content/uploads/2021/02/WPG-FRP-Briefing-on-ISNI.pdf>

children⁶, with lone parents suffering more than most. Policy makers know that most single parents are women, 93% in Northern Ireland.

The Gender Equality Strategy Expert Panel report⁷ highlights the harm that results from decades of gender-neutral policy making:

“A gender-neutral policy-making approach exists in Northern Ireland and has prevented progress on tackling gender-based violence and misogyny. The issue of gender neutrality acts as a significant barrier to women’s equality and major reforms are needed in order to make progress in this area.”

The CEDAW committee shares these concerns, stressing that a purely formal approach cannot achieve gender equality, equality and requires that women are given an equal start and empowered by an enabling environment to achieve good outcomes:

“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.”⁸

The purpose of an EQIA is not to encourage us to throw up our hands and despair at yet more gender inequality brought about by Government policy or economic choices, it is to ask Departments to identify differential impacts and to address them - in fact it asks Departments to identify opportunities to encourage equality of opportunity. In practice, it rarely happens.

This not only fails to assist in the work of achieving gender equality, it actively entrenches inequality. It directly contributes to a situation where women are poorer throughout their lives, have fewer opportunities in work and in society, and consistently have the barriers they face reinforced by government.

With its pivotal role that incorporates further and higher education and the economic development of NI, DfE holds the keys to one of the areas of life that has been slowest to change with regards to gender equality. The world of work was not only difficult for women to enter, it remains a place where women are systemically disadvantaged in terms of pay and conditions, where the “motherhood penalty” is real, and where fields dominated by women are almost

⁶ Women’s Budget Group, The Impact of Austerity on Women in the UK, available at: <https://www.ohchr.org/sites/default/files/Documents/Issues/Development/IEDebt/WomenAusterity/WBG.pdf>

⁷ [1] Gender Equality Strategy, Expert Advisory Panel Report, December 2020
[Gender Equality Strategy \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/gender-equality-strategy)

⁸ 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

universally devalued and underpaid. While we are not suggesting that DfE holds responsibility for these realities, it is undeniable that DfE can influence change in this regard. Regrettably, this budget shows no willingness to do so and no curiosity about why some of the phenomena that pervade our working lives do so. This budget EQIA is a missed opportunity for change.

It is important to acknowledge that the current budget process is particularly abnormal, and we understand that the budget allocations delivered by the Secretary of State are not only highly restrictive but put undue pressure on officials to make decisions they should not have to make. The abnormality of this budget cycle also means that planning procedures that occur during a typical budget process have not taken place. Without the fulfilment of these procedures, the equality screening and impact assessment consultation comes too late in the process and is inadequate for full consideration of the impact of these spending decisions on women.

1.1 The importance of gender budgeting

Gender Budgeting requires government departments to analyse the different impact of a 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 crisis⁹¹⁰. 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.

Not only is there an immediate need for gender budgeting in our current crisis, but 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-

⁹ MacDonald, E.M. (2018) The gendered impact of austerity: Cuts are widening the poverty gap between women and men. British Politics and Policy at LSE. <https://blogs.lse.ac.uk/politicsandpolicy/gendered-impacts-of-austerity-cuts/>

¹⁰ 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/>

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.

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 place at the very end of the budget planning process or after the budget has been finalised. The OECD¹¹ highlights that best practice for gender budgeting is to embed it at all levels of policy- and 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.

2. Response to Consultation Questions

This section of our response will provide specific responses to each of the EQIA Consultation questions.

- 1. Do you agree that DfE has gathered the necessary data to inform its decisions around the allocation of its budget? If not, what other sources of data should the Department consider?*

Strongly Disagree.

The only data sources considered by the Department to inform this EQIA were the following:

- Statistical Bulletin Training for Success 2013/2017 Quarterly Statistics from May 2013 to July 2022: NISRA/ Department for the Economy

¹¹ OECD (2023), OECD Best Practices for Gender Budgeting, *OECD Journal on Budgeting*, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

- Skills For Life infographic quarter ending Jan 2022: NISRA/ Department for the Economy
- ApprenticeshipsNI Bulletin - Department for the Economy
- Higher Level Apprenticeships at FE Colleges and CAFRE - Statistical Bulletin 2017-18 to 2021/22 – Department for the Economy
- Higher Level Apprenticeships Statistical Bulletin: Department for the Economy
- Further Education enrolments statistics/ NISRA publications: Department for the Economy
- Traineeship statistics: Vocational Educational Training publications - Department for the Economy
- Higher Level Apprenticeships statistics 2017-18 to 2019-20: Department for the Economy
- Labour Force Survey - NI employment statistics: NISRA
- Northern Ireland Census figures 2011, 2021: NISRA
- Invest NI Activity statistics by Type of Support 2016-17 to 2020-21: Invest NI

The following data sources should also have been considered:

- ARK Working Paper 2: Apprenticeship Strategy¹²
- Gender Equality Strategy Expert Panel Report¹³
- WPG NI COVID-19 Feminist Recovery Plan (2021)¹⁴
- WPG Primary Research Report: The Impact of COVID-19 on Women: Putting Women's Voices at the Core¹⁵

The issue with a very limited dataset is that the evidence will give the impression that there are no impacts, while a wider dataset would show that there may be several. That may seem obvious, but it is absolutely essential that a wide net is cast and that the Department makes a conscious effort to find the data most likely to identify the information that will be relevant to the various Section 75 groups.

¹² Professor Joan Ballantine, Dr Michelle Rouse, Professor Ann Marie Gray (2021) 'Gender Budgeting: Working Paper 2 Case Study: Apprenticeships in Northern Ireland,' Available at: https://www.ark.ac.uk/ARK/sites/default/files/2021-02/Gender_Budgeting-2.pdf

¹³ Gender Equality Strategy Expert Advisory Panel Report (2020) Available at: <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

¹⁴ Women's Policy Group (2021) WPG COVID-19 Feminist Recovery Plan: Relaunch - One Year On. Available at: <https://wrda.net/wp-content/uploads/2021/07/WPG-COVID-19-Feminist-Recovery-Plan-Relaunch-One-Year-On.pdf>

¹⁵ Women's Policy Group (2021) 'Primary Research Report: The Impact of COVID-19 on Women: Putting Women's Voices at the Core.' Available at: <https://wrda.net/wp-content/uploads/2021/07/WPG-Feminist-Recovery-Plan-Research-Report-Womens-Voices-at-the-Core.pdf>

This is the case for all groups, and with regard to our specific area of expertise, also the case for the impacts of these decisions on women. Given the scope of this budget EqIA includes work on apprenticeships, and reaches the conclusion based on DfE figures that men will be especially impacted, the ARK Working Paper on Apprenticeships in Northern Ireland is particularly relevant and should have been included at a minimum.

This paper highlights the way that apprenticeships in Northern Ireland favour men over women, enhancing their employability skills, earning potential and social mobility over the equivalent for women. For these reasons and others - including the social reality that apprenticeships are often focused on work that men are more likely to undertake than women, and the reality of childcare and other caring duties, for example - it is unsurprising that this conclusion was reached:

“A wide range of analysis, however, suggests that apprenticeship programmes may reflect existing inequalities in labour market participation and as a policy intervention which establishes career paths and trajectories, may actually serve to consolidate and reinforce gendered inequalities...which result in locking in lower pay, gendered occupational segregation and unequal labour market participation. While occupational segregation restricts choices for both men and women, the jobs that are likely to be done by women are more likely to be associated with low pay and limited potential for career progression.”¹⁶

Further, DfE investment in apprenticeships disproportionately favours the apprenticeships that men tend to favour over those dominated by women:

“Economic analysis of the apprenticeship data in NI reveals that the estimated GVA per participant for men is £78,400 while the GVA for women is estimated to be less than half at £35,900. These figures reflect the fact that women’s representation is dramatically lower in those subjects which lead to high wage jobs, and ultimately a higher standard of living for women and their families. Public expenditure on apprenticeships in NI overwhelmingly benefits participants who are men as a result of men’s overrepresentation in general and men’s colonisation of more resource intensive programmes (HLAs). Whilst ostensibly neutral, apprenticeship policy and expenditure in NI are, in fact, highly gendered in operation and perpetuate gender norms which inhibit women’s engagement with the labour market in Northern Ireland.”¹⁷

¹⁶ Ballantine, Rouse and Gray, ARK Working Paper 2: Apprenticeships in Northern Ireland. Available online at: https://www.ark.ac.uk/ARK/sites/default/files/2021-02/Gender_Budgeting-2.pdf

¹⁷ Ibid p.2

This evidence alone demonstrates why taking the data held by DfE may give the impression that men will suffer more for cuts in apprenticeships programmes, but given that we can see that men benefit disproportionately from the current status quo, there is a strong argument that women - whose apprenticeships are in general worth less than men's - will suffer even more from any cuts.

The fact that this DfE data is laid out in the consultation document next to analysis from Invest NI that recognises that:

“Women are under-represented in the highest paid and highest status occupations and over-represented in lower status and lower paid occupations. There are a variety of contributing factors to explain this disparity, however evidence suggests that a greater proportion of female economic inactivity is as a result of home and caring responsibilities compared with males...”

A reduction of activity among INI programmes would reduce potential employment opportunities that may otherwise have materialised and would therefore have likely adverse impacts upon people in most or all Section 75 groups. However, restrictions upon programmes to address under-representation of women, and women - returners to the labour market, would have a disproportionate adverse impact upon women generally.”

This data seems to contradict the analysis by DfE and contradicts the overall conclusion that while all groups are impacted, no one group is impacted more than any other. A full and sincere attempt at an EQIA would have paused at this point and considered whether their conclusions were correct and whether or not some data was missing from the original analysis, leading to contradictory statements.

2. *Do you agree with DfE's assessment of the proposals for budget reductions? If not, what other areas of the Department's spend should be considered?*

Strongly Disagree.

Firstly, this EQIA only provides an assessment of two areas of the Department's work, namely, Apprenticeships & Youth Training and Invest NI. All areas of Department spending should have been considered in this EQIA, particularly since the Department recognises at the beginning of the EQIA that 'the nature of DfE's work will result in the impact being felt across all section 75 groups.'

Secondly, the assessment of the two areas of work that are considered in this EQIA is extremely lacking. The assessment lacks detail, depth, intersectionality and a meaningful understanding of where inequalities exist.

3. Do you agree with DfE's assessment of equality impacts of the options considered for budget reductions? If not, what other equality impacts does the Department need to take account of?

Strongly Disagree.

In DfE's EQIA, it states that:

The nature of DfE's work will result in the impact being felt across all section 75 groups, therefore, as no one section is disproportionately impacted at the expense of another, this has resulted in most business areas being screened out.

It is hard to believe that all Section 75 groups will be impacted equally by these cuts, and no evidence is provided to suggest that this statement is based on any particular evidence. This blanket statement speaks to a lack of data and understanding by the Department as to where inequalities exist and the impact of the Department's work on different parts of the community. As a result, this EQIA is only based on two areas of DfE's work: Apprenticeships & Youth Training and one ALB (Invest NI). This immediately limits the scope of DfE's analysis and omits several important areas of DfE's work that should have been screened for equality impacts. Consequently, it limits stakeholders' ability to provide meaningful feedback on the equality impacts of the spending proposals, and pigeon-holes the analysis into two very specific workstreams. Overall, this EQIA provides an extremely limited analysis that lacks detail, depth and any reference to the intersectional impacts of these spending plans.

Looking specifically at the two areas of work assessed in this EQIA, there are several equality impacts that the Department has not taken account of. In summary, these include:

- No differential impacts identified for people of different religious belief, racial group or sexual orientation
- No disproportionate impacts on women identified for DfE Apprenticeships Youth & Training
- Limited intersectional analysis between Section 75 groups e.g., specific impacts on disabled women, women with dependants or young women

- Despite acknowledging that care responsibilities create significant barriers to women entering the labour market, in the assessment of impacts on people with dependants, no mention is made of the fact that women are more likely than men to have dependants. This demonstrates a clear lack of intersectional analysis between Section 75 groups and seriously weakens the credibility of this analysis.
4. *Do you agree that DfE has correctly identified all relevant mitigations that could help reduce the adverse equality impacts of the budget reductions? If not, what additional mitigation measures should the Department consider?*

Strongly Disagree.

This question is highly confusing as DfE has not identified any relevant mitigations that could help reduce adverse equality impacts. We would like to remind the Department that when conducting an EQIA, it has an obligation to consider how potential impacts on protected groups can be reduced. The Equality Commission for Northern Ireland state that¹⁸:

If screening identifies that a policy has major potential to impact on equality of opportunity and good relations, then it should be subjected to a more detailed analysis - an Equality Impact Assessment (EQIA). This means if a policy shows a possible 'adverse impact' on any group, the public authority must consider how this might be reduced. This would include how an alternative policy might lessen this effect and serve to promote equality of opportunity.

This EQIA published by DfE highlights a failure by the Department to identify ways to reduce negative impacts on protected groups, as no mitigating measures were identified. Not only does this fall short of the Department's responsibilities under Section 75, it negatively impacts the ability of key stakeholders to meaningfully engage with this public consultation and support the Department in its equality screening duties.

In the context of the draft EqIA, it is essential to note that Northern Ireland is bound by the international human rights obligations of the UK, as State Party to all key human rights conventions, including the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). Progressive realisation of rights is a key principle of the international human rights framework, in recognition that implementation is affected by many factors including

¹⁸ Equality Commission Northern Ireland (2023) 'Section 75 Duties for Public Authorities' Available at: <https://www.equalityni.org/S75duties#:~:text=Section%2075%20requires%20public%20authorities,a%20disability%20and%20persons%20without>

resourcing; however, this incorporates a complementary principle that existing rights cannot be rolled back or weakened.¹⁹ This is vital in the context of budget cuts, as the impact may affect the ability of some rights holders to enjoy and exercise their rights, and therefore must be assessed with alternatives and relevant mitigating action considered. The relevant guidance to the UK in this regard is provided through recommendations from UN monitoring bodies for each of the nine core frameworks, which set out actions for the UK to strengthen realisation of rights for all.

The full set of recommendations for Northern Ireland and the UK from UN monitoring bodies is extensive, ranging from over 300 recommendations from the Universal Periodic Review in 2022²⁰ to forthcoming Concluding Observations on the UN Convention on the Rights of the Child, for which the UK was examined in May 2023.²¹ 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’.²² The CEDAW Concluding Observations also urge for full implementation of the recommendations of the Inquiry into abortion legislation in Northern Ireland²³ and implementation of the women, peace and security agenda.

The likely impact of proposed cuts, across Departments, is to reduce realisation of rights set out in CEDAW, in particular in relation to women’s economic independence and safety from violence and domestic abuse. This will further widen the gap between Northern Ireland and other devolved administrations in the UK, serving to deepen disadvantage of women and girls in Northern Ireland.

The WPG recommend the following mitigation measures to be considered by the Department:

- Urgently work to incorporate gender budgeting into all financial decision-making processes and work with key stakeholders such as the Northern Ireland Women’s Budget Group and the Women’s Policy Group to identify the most effective and workable implementation approaches

¹⁹ See [International Covenant on Economic, Social and Cultural Rights](#) for a discussion of both principles

²⁰ Human Rights Council (January 2023) [Report of the Working Group on the Universal Periodic Review: United Kingdom of Great Britain and Northern Ireland](#)

²¹ UN Office of the High Commissioner on Human Rights press release 19 May 2023 ‘[Experts of the Committee on the Rights of the Child Note Progress in Addressing the Age of Marriage in the United Kingdom, Ask about High Poverty Rates among Families with Children with Disabilities and the Proposed Illegal Migration Bill](#)’

²² CEDAW Committee (March 2019) [Concluding Observations on the 8th periodic report of the UK](#)

²³ CEDAW Committee (February 2018) [Inquiry into abortion legislation in Northern Ireland under Article 8 of the Optional Protocol to CEDAW](#)

- Re-examine the EQIA carried out here with a wider range of data, as suggested above, as well as including a RNIA and examine all proposals through an intersectional lens, avoiding those choices that will have multiple impacts for some parts of the community.
- Consider ring-fencing of some parts of the budget that will most impact those most likely to suffer multiple impacts.

5. *Do you agree with DfE's overall assessment of the business areas where the proposed budget reductions will need to be made? If not, which areas of the Department's business would be better able to withstand reductions?*

This EQIA only provides an assessment of two areas of the Department's work, namely, Apprenticeships & Youth Training and Invest NI. EQIAs are only as useful as the information contained within them. To accurately and fully answer this question, we need more information regarding the breakdown of the department's budget so that we can indicate where other savings could be made.

In addition, this process should feed into meaningful engagement, the choices proposed here must not be a *fait accompli* but presented in the context of other options; costed and explained. Otherwise it is nearly impossible for civil society or affected individuals to be in a position to defend spend and suggest meaningful alternatives.

6. *Do you have any other comments you would like to add about this consultation?*

As stated above, we are acutely aware that these difficult decisions are made against a backdrop not of DfE's making and we are aware that these are not choices that are freely made, as such. With that said, the purpose of EQIAs in general is that the Department is obliged to consider impacts on protected groups. These Section 75 groups are listed in the first place because they are the groups most likely to be adversely impacted by taking an approach that does not include outliers. The purpose is not merely to identify disproportionate impacts but to actively mitigate against them and ideally to seek opportunities to promote equality for these groups.

Over time and in practice, we recognise that this is not always the approach taken by government departments, who are obliged to take part in this process but do not always do so effectively. As such, many EQIAs list no adverse impacts when data gathered and experience lived by individuals and the organisations that represent them indicate the opposite. To its credit, this EQIA identifies multiple adverse impacts, although not all that we anticipate, and does attempt to take an intersectional approach to these impacts. The next part of the duty is to seek to mitigate these, and this is where this process fails.

In addition, EQIAs are only as useful as the information contained within them. To accurately answer question 3 above we would need a line by line breakdown of the Department's budget so that we could indicate where savings could be made in places other than the proposed choices. In addition, this process should feed into meaningful engagement, the choices proposed here must not be a *fait accompli* but presented in the context of other options; costed and explained. Otherwise it is nearly impossible for civil society or affected individuals to be in a position to defend spend and suggest meaningful alternatives.

Adding to the challenges in responding to this consultation is the absence of a Rural Needs Impact Assessment (RNIA) which would provide a richer picture of the potential impacts of this budget. Alongside an intersectional approach, a RNIA would provide a fuller picture of the layering of impacts for some parts of society. The advantages of an intersectional approach is that it recognises the fundamental truth that no person is merely one thing, and that if a budget or policy disproportionately harms women, disabled people, people living in rural communities, and people with dependents, then it will vastly disproportionately impact women with disabilities and dependents who live in rural communities. This enormous impact should prioritise action to mitigate as many of those impacts as possible.

Further, the timescale for responses to these EQIAs is insufficient. Approaching a sector that faces significant resource constraints, standing in the gaps created by more than a decade of austerity and facing further cuts, and requesting a meaningful response in a short window of time is thoroughly unhelpful. There should also only be one deadline for consultation responses, as setting multiple deadlines for the same consultation is highly confusing and may lead to the exclusion of key voices from impacted sectors. In recent weeks, we have seen several Departments release consultations on their budget EQIAs with an official deadline of 12 weeks but with a disclaimer that if stakeholders want their feedback to be taken on board and incorporated into budget decision-making, responses must be received within four weeks. This is highly unhelpful and confusing.

The Department for the Economy plays a pivotal role in further and higher education in Northern Ireland as well as driving the economy. This field - arguably more than any other - therefore incorporates the field in which women are still most systematically disadvantaged, namely the world of work. It is deeply concerning to us that these centuries-long, misunderstood and recalcitrant issues are not recognised in any depth by the department, and that no actions are suggested to mitigate for the disproportionate impacts that will follow from the draft budget.

ENDS

For any questions or queries relating to this submission, please contact:

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