

# WPG NI Response to The Executive Office's Spending Plans for 2023–2024 Equality Impact Assessment

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#### **Contact:**

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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 <a href="mailto:elaine.crory@wrda.net">elaine.crory@wrda.net</a>

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 Women's Regional Consortium and the Northern Ireland Women's Budget Group.

## 2. 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)<sup>1</sup>
- WPG Letter to Secretary of State regarding budget cuts (2023)<sup>2</sup>
- WPG Response to DfE 10X Performance Management Framework (2022)<sup>3</sup>
- WPG Letter to Executive Ministers regarding Welfare Mitigations and Spending Cuts (2021)<sup>4</sup>
- WPG Briefing on Capital Investment and Investment Strategy Northern Ireland (2021)<sup>5</sup>
- 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

# 3. General Comments on The Executive Office'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.

<sup>&</sup>lt;sup>1</sup> 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-Ye ar-On.pdf

<sup>&</sup>lt;sup>2</sup> 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

<sup>&</sup>lt;sup>3</sup> WPG Response to DfE 10X Performance Management Framework (2022) Available at: <a href="https://wrda.net/wp-content/uploads/2022/10/WPG-Response-to-DfE-10X-Performance-Management-Framework.pdf">https://wrda.net/wp-content/uploads/2022/10/WPG-Response-to-DfE-10X-Performance-Management-Framework.pdf</a>

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

<sup>&</sup>lt;sup>5</sup> WPG Briefing on Capital Investment and Investment Strategy Northern Ireland (2021) Available at: <a href="https://wrda.net/wp-content/uploads/2021/02/WPG-FRP-Briefing-on-ISNI.pdf">https://wrda.net/wp-content/uploads/2021/02/WPG-FRP-Briefing-on-ISNI.pdf</a>

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 children<sup>6</sup>, 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 report<sup>7</sup> 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."<sup>8</sup>

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

Gender Equality Strategy (communities-ni.gov.uk)

<sup>&</sup>lt;sup>6</sup> Women's Budget Group, The Impact of Austerity on Women in the UK, available at: <a href="https://www.ohchr.org/sites/default/files/Documents/Issues/Development/IEDebt/WomenAusterity/WBG.p">https://www.ohchr.org/sites/default/files/Documents/Issues/Development/IEDebt/WomenAusterity/WBG.p</a>

<sup>&</sup>lt;sup>7</sup> [1] Gender Equality Strategy, Expert Advisory Panel Report, December 2020

<sup>&</sup>lt;sup>8</sup> General Recommendations Adopted by the Committee on the Elimination of Discrimination against Women, Thirtieth session (2004), General Recommendation No 25 <a href="https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1\_Global/INT\_CEDAW\_GEC\_3733\_E.pdf">https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1\_Global/INT\_CEDAW\_GEC\_3733\_E.pdf</a>

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.

It cannot be avoided that TEO is the Department responsible for the EVAWG Strategy. This Strategy was long fought and campaigned for, and the team from TEO who curated the co-design process took great pains to ensure that the Strategy is the best that it can be. It has the potential to be transformative to our society in the best possible way, and it will save lives for generations to come. Without hyperbole, it is among the most important work to come from the NI Assembly ever. This cannot be allowed to sit on a shelf, the Strategy must be resourced and implemented in full.

In addition, we are aware that the roll out of free period products will be delayed as a result of budgetary pressures. While not subject to this EQIA in a formal sense, this is a decision, however reluctantly taken, that will have an obvious impact on women and girls, as well as on transgender men and non-binary people. This decision is deeply regrettable.

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.

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 crisis<sup>9</sup>. 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-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 OECD<sup>10</sup> 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

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/

<sup>&</sup>lt;sup>9</sup> 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/

<sup>&</sup>lt;sup>10</sup> OECD (2023), OECD Best Practices for Gender Budgeting, *OECD Journal on Budgeting*, vol. 23/1, https://doi.org/10.1787/9574ed6f-en.

the budgetary process through gender analysis of data supported by experts from civil society.

## 4. 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 TEO has gathered the necessary data to inform its decisions around the allocation of its budget?

We commend TEO for working to take an intersectional approach to this EQIA process, something WPG has long urged and which is necessary for all government departments. While this is very welcome, the lack of a Rural Needs Impact Assessment (RNIA) is noticeable throughout; many of the proposed decisions, including the reduction of Good Relations programmes and the potential reduction of activities from the EVAWG Strategy will have additional impacts on women in rural communities, who are furthest from help and who research shows struggle more than urban women to leave domestic abuse situations, for instance<sup>11</sup>. Also absent is the use of gender disaggregated data, and where this is acknowledged it is not framed as evidence of an inequality that must be mitigated, simply as a fact. As aware as we are of budgetary pressures, this is not sufficient and does not fulfil the purpose of an EQIA.

In addition, we are unclear as to the reasons that no impact on the LGBTQI+ community has been found. Evidence from WPG research into VAWG reiterates what has been widely recognised in worldwide research for some time; lesbian, bisexual and transgender women are impacted by VAWG in unique ways<sup>12</sup>, often intersecting with other parts of their identity, and bisexual women experience sexual violence at rates that exceed that of heterosexual women.

Any proposed cuts to support services will have a direct impact on the LGBTQIA+ community. Many LGBTQIA people experience multiple intersecting inequalities and barriers, which can interact to increase their vulnerability for example, by being deaf and disabled, a migrant trans person, an older lesbian woman, LGBTQIA+ homeless young person, or belonging to a minority ethnic group.

<sup>12</sup> Women's Policy Group, Violence Against Women and Girls in Northern Ireland, 2022, <a href="https://wrda.net/wp-content/uploads/2022/04/WPG-VAWG-Research-Report.pdf">https://wrda.net/wp-content/uploads/2022/04/WPG-VAWG-Research-Report.pdf</a> p.34

Women's Policy Group NI, Response to the Draft Domestic and Sexual Abuse Strategy, 2023, <a href="https://wrda.net/wp-content/uploads/2023/05/WPG-Response-to-DSA-Strategy-.pdf">https://wrda.net/wp-content/uploads/2023/05/WPG-Response-to-DSA-Strategy-.pdf</a> p.33
 Women's Policy Group, Violence Against Women and Girls in Northern Ireland, 2022,

Unfortunately, in Northern Ireland, there are significant gaps in data collection which leads to gaps in protection for LGBTQIA people. Within Northern Ireland, there is a failure of local government and public bodies to monitor sexual orientation and gender identity in their data collection, to identify gaps or potential service improvements. Therefore it is key that public authorities and stakeholders are monitoring for sexual orientation and gender identity.

Over the last year, we have seen an increase in hate crime and in particular incidents of homophobic and transphobic hate crimes connected in or around people's homes. In 2021/2022 there has been an increase of over 35% in homophobic incidents and 11% in Transphobic incidents. This is the highest year to date for anti-LGBTQIA hate crimes according to PSNI statistics. Any cut to work in terms of T:BUC or Good Relations work will have a knock on effect for the LGBTQIA+ community and the wider section 75 grouping.

Additionally, there is a direct need for key investment into the development and longevity of the sector to support and tackle disadvantages that the LGBTQIA+ Community still experienced.. The sector receives little or no core funding regarding policy development for key governmental strategies, this includes key TEO Strategies such as EVAWG or Period Dignity. There is also no funding towards service delivery and supporting clients experiencing domestic abuse and sexual violence.

As a whole, evidence is listed and noted, but no statistical data is drawn out from the list of sources to explain or account for how certain choices were made and certain programmes will be cut, delayed or reduced. This is an essential part of the process and must be accounted for.

#### 2. Do you agree with TEO's assessment of the options for budget reductions?

We are mindful that TEO - like all Government Departments - are presently facing a very difficult set of decisions. Given these restrictions, good and important work will be impacted.

This includes Good Relations work, which will impact organisations delivering this work immediately, the communities they serve in the short and medium term, and in the longer term will have a harmful impact on the ability of our society as a whole to heal from past harms and to ensure good relations prevails. Potential cuts to planned spend on the implementation of the EVAWG Strategy will have an obvious impact on women and girls, compounded on those women who are further marginalised in our society, including by virtue of rurality, disability, or membership of the LGBTQI+ community.

It is difficult to be precise as to the long term impacts of reducing or delaying this work, but since we still live in a divided society a quarter century after the Belfast / Good Friday Agreement we can conclude that Good Relations work, particularly with young people, will be central to moving away from that and, as such, we cannot afford to treat it as an optional extra. With regards to delays or cuts to the planned work of the EVAWG Strategy, the WPG has long campaigned for this, been centrally involved in the co-design process, and many member organisations are involved in front line service provision in the field of VAWG. For these reasons and especially because our society has a serious, endemic and fatal problem with VAWG, this work is urgent and cannot be delayed any further.

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 resourcing; however, this incorporates a complementary principle that existing rights cannot be rolled back or weakened. 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 2022<sup>14</sup> to forthcoming Concluding Observations on the UN Convention on the Rights of the Child, for which the UK was examined in May 2023.<sup>15</sup> 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

<sup>&</sup>lt;sup>13</sup> See <u>International Covenant on Economic, Social and Cultural Rights</u> for a discussion of both principles

<sup>&</sup>lt;sup>14</sup> Human Rights Council (January 2023) Report of the Working Group on the Universal Periodic Review: United Kingdom of Great Britain and Northern Ireland

<sup>&</sup>lt;sup>15</sup> 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'

footing with those in England, Scotland and Wales'. The CEDAW Concluding Observations also urge for full implementation of the recommendations of the Inquiry into abortion legislation in Northern Ireland 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.

## 3. Do you agree with TEO's assessment of equality impacts of the options considered for budget reductions?

As outlined above and in addition to the adverse impacts noted by the EQIA, this budget will have impacts on members of the LGBTQI+ society, particularly women from that community and transgender people of all genders and none, and on rural communities.

The lack of a Rural Needs Impact Assessment (RNIA) is noticeable throughout; many of the proposed decisions, including the reduction of Good Relations programmes and the potential reduction of activities from the EVAWG Strategy will have additional impacts on women in rural communities, who are furthest from help and who research shows struggle more than urban women to leave domestic abuse situations, for instance<sup>18</sup>.

Also absent is the use of gender disaggregated data, and where this is acknowledged it is not framed as evidence of an inequality that must be mitigated, simply as a fact. As aware as we are of budgetary pressures, this is not sufficient and does not fulfil the purpose of an EQIA.

In addition, we are unclear as to the reasons that no impact on the LGBTQI+ community has been found. Evidence from WPG research into VAWG reiterates what has been widely recognised in worldwide research for some time; lesbian, bisexual

<sup>&</sup>lt;sup>16</sup> CEDAW Committee (March 2019) <u>Concluding Observations on the 8<sup>th</sup> periodic report of the UK</u>

<sup>&</sup>lt;sup>17</sup> CEDAW Committee (February 2018) <u>Inquiry into abortion legislation in Northern Ireland under Article 8 of the Optional Protocol to CEDAW</u>

<sup>&</sup>lt;sup>18</sup> Women's Policy Group NI, Response to the Draft Domestic and Sexual Abuse Strategy, 2023, https://wrda.net/wp-content/uploads/2023/05/WPG-Response-to-DSA-Strategy-.pdf p.33

and transgender women are impacted by VAWG in unique ways<sup>19</sup>, often intersecting with other parts of their identity, and bisexual women experience sexual violence at rates that exceed that of heterosexual women.

In addition, failure to fill judicial vacancies will impact on women & girls as well as the groups identified due to long wait for cases on domestic and sexual abuse and violence. Long delays have been identified as a major issue in Gillen Review, Domestic and Sexual Abuse Strategy and in the work of the co-design group on the EVAWG Strategy, as well as by the PPS as a reason why victims drop out of cases. This should be listed as an impact on women and girls.

# 4. Do you agree that TEO has correctly identified all relevant mitigations that could help reduce the adverse equality impacts of the budget reductions?

Overall the approach to this issue is carefully considered and we commend the ring fencing of support for victims and survivors, however on some level it is clear that the import of some work - Good Relations and especially the work that will fall out of the EVAWG Strategy - have not been properly weighed in terms of their urgency and the lifesaving work that they will do.

With regards to the EVAWG Strategy, in section b the EQIA mentions "prioritising projects for funding where the safety of a group is at risk" and then section d mentions "that the emerging findings of good practice on Ending Violence Against Women and Girls are promulgated and widely embedded". The safety of women and girls is at risk - in fact the safety of women and girls has been constantly undermined by the continued refusal of the state to form a Strategy towards ending VAWG to date, not least as our position as one of the most dangerous places in Europe to be a woman is widely recognised. To face a situation where this has finally been accepted by government and recognised as a major problem, where the work has been done to prepare an excellent and thorough Strategy and there is a reasonable expectation of progress, only to see this weak and meaningless approach is both neglectful and actively dangerous.

From the beginning of this process the WPG has been clear that the only way that the Strategy will succeed in its goals is by real investment in the work that needs to be done. Some of this investment will indeed involve embedding good practice across all government departments and ensuring that the Strategy involves a new approach to all work. This is not enough, however, or even close to enough. This is a crisis that is killing and harming women and girls and this fact is not recognised by

<sup>&</sup>lt;sup>19</sup> Women's Policy Group, Violence Against Women and Girls in Northern Ireland, 2022, https://wrda.net/wp-content/uploads/2022/04/WPG-VAWG-Research-Report.pdf p.34

these mitigations as proposed. We urge TEO to consider ringfencing of funds towards the EVAWG Strategy because it belongs in the same category as much of the other worthy priority areas that have been ringfenced.

# 5. Do you agree with TEO's overall assessment of the business areas where budget reductions will need to be made?

No. Reductions will be made not only to vital work, but important work will be arrested and ALBs like the Equality Commission, which is there to safeguard the equality of our whole society, will be reduced in capacity and this will harm people in real time, in ways not easily resolved.

Most vitally the work of the EVAWG Strategy will be stalled and this is unacceptable and actively contributing to a society where the safety and the very lives of women and girls are not weighed appropriately by the people making decisions. Gender inequality and Violence Against Women and Girls perpetuate and buffer each other, worsening each other continually. A budget that deepens gender inequality and fails to act to tackle VAWG is the worst of both worlds, and speeds up the cycle, perpetuating the harm.

## 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 TEO'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 is already working on a shoestring, 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.

Finally, the WPG has members who were closely involved in the co-design process for the Ending Violence Against Women & GIrls (EVAWG) Strategy and we feel strongly that the work of this Strategy has both transformative potential and real urgency. Every year - indeed every day - that we fail to act on this issue is another opportunity missed to tackle this scourge. With consideration that this will be a multi-year strategy, we urge the prioritisation of less resource-heavy work in year one of the strategy and the ring-fencing of funds to support that work,, rather than postponing the implementation of the Strategy entirely - it simply cannot afford to wait.

**ENDS** 

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

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