

# **Women's** **Policy Group NI**

WPG NI Response Department for Communities  
EQIA on Changes to the Discretionary Support  
Scheme

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**Contact:**

Elaine Crory  
Women's Sector Lobbyist  
[elaine.crory@wrda.net](mailto:elaine.crory@wrda.net)

## **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.

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](mailto:elaine.croory@wrda.net)

This response was prepared by the following WPG members:

- Elaine Crory – Women's Resource and Development Agency
- Aoife Mallon - Women's Resource and Development Agency
- Jonna Monaghan - Women's Platform
- Siobhan Harding - Women's Support Network
- Alex Brennan - NI Women's Budget Group

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.

### **1.1 Endorsements**

The WPG would like to endorse the response submitted to this call for evidence by the Women's Support Network.

## **2. Past Consultations Responses, Evidence Submissions and Briefings:**

Several members of the Women's Policy Group have been campaigning on matters relating to Discretionary Support for many years. The WPG has published a wide range of evidence through various evidence submissions, public consultation responses and specific briefings on issues relating to this issue. Responses made by

the WPG and some of our members, in relation to issues covered in this Consultation, include:

- WPG [Response](#) to DfC Spending Plans 2023-2023 EQIA (2023)
- WPG [Response](#) to DfC Debt Respite Policy (2023)
- WPG [Response](#) to DfC Audit of Inequalities (2022)
- WPG [Response](#) to DfC Housing Supply Strategy (2022)
- WRC [Research](#) on the impact of the Cost of Living Crisis on Women (2023)

### **3. WPG Feminist Recovery Plan:**

#### **3.1. Overview of WPG Feminist Recovery Plan:**

The WPG NI COVID-19 Feminist Recovery Plan highlights the disproportionate impact of the pandemic on women and makes several recommendations for addressing this impact. The Plan also provides detailed evidence of pre-existing gender inequalities in our society, which have become exacerbated as a result of the pandemic. The Plan covers a wide range of topics, including violence against women, health inequalities and women's poverty, within six main Pillars: Economic Justice, Health, Social Justice, Culture, Brexit, Human Rights and a Bill of Rights, and International Best Practice.

The WPG published a COVID-19 Feminist Recovery Plan in July 2020 (and a relaunched version in July 2021) that provided a comprehensive roadmap on how the NI Executive could not only address the disproportionate impact of COVID-19 on women, but also address the structural inequalities existed before the pandemic that led to such a disproportionate impact on women. A summary of recommendations from the Relaunched WPG Feminist Recovery Plan can be accessed [here](#).

### **4. General Comments on the proposed Changes to the Discretionary Support Scheme**

#### **4.1 Anticipated impact of proposed changes**

The proposed changes to the Scheme will have an impact on those most likely to need its support; in this case those living in poverty, including those who are close to destitute. This means that the proposed changes will disproportionately impact women and their children. Other groups that will be disproportionately impacted include people with disabilities and people with dependents; the latter category of whom are more likely to be women, since 97% of lone parent households are headed by women.

Research from the Joseph Rowntree Foundation indicates that, “Almost every low-income household on Universal Credit is going without the basics (90%) – either experiencing food insecurity, or going without basics like a warm home and essential journeys. This rises to 95% where deductions are being made, for example to repay debts to Government.”<sup>1</sup>

- It also shows that, for all low-income households in the bottom 40% of incomes:
  - 7.2 million households (62%) are going without essentials. This means that they have reported going hungry, or cutting down the size of meals or skipping meals in the last 30 days, or going without basics like showers or adequate clothing since June.
  - 4.7 million households (41%) are in arrears with at least one household bill and the average level of arrears remains above £1,600.
  - 4.3 million (37%) are going without essentials AND in arrears with at least one household bill, and
  - Over 3 million households (28%) have not been able to keep their home warm since June because they couldn’t afford to.

Action for Children<sup>2</sup>, who launched a Savanta ComRes poll in the winter of 2022, alongside LucidTalk in Northern Ireland, to gauge the levels of financial stress among families working either full or part time in Northern Ireland specifically, have found stark results:

- 53% of working parents in Northern Ireland were stressed about money concerns in the lead up to Christmas 2022
- 97% have worried about money in the last six months, with 46% having worried “often”
- 71% have cut back on heating their homes
- over half (51%) have had trouble sleeping
- more than two-fifths (45%) have tried to hide their money worries
- nearly two-fifths (38%) have noticed their mental health worsen
- a quarter (25%) have become upset or stressed in front of their children, and
- two fifths (40%) have had an argument with a partner due to financial worries.

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<sup>1</sup> Joseph Rowntree Foundation, Going Under and Without, 2022  
<https://www.jrf.org.uk/report/going-under-and-without-jrfs-cost-living-tracker-winter-202223>

<sup>2</sup> Action for Children  
<https://www.actionforchildren.org.uk/our-work-and-impact/our-work-around-the-uk/our-work-in-northern-ireland/>

Research by the Women's Regional Consortium into women living with debt in Northern Ireland<sup>3</sup>, has found that:

- 51% of the women had used high-cost credit with 6% borrowing through loan sharks including paramilitaries.
- 32% reported borrowing from friends/family.
- 19% had borrowed through Discretionary Support with many reporting issues with the application process/eligibility.
- 51% chose the lender because they knew they would get the money with only 2% choosing the lender because of the total cost of the credit.
- 60% of the women had difficulty meeting and/or missed debt repayments.
- 35% had to use a food bank as a result of debts/making ends meet.
- 44% said they had got into debt/worse in debt as a result of Covid.
- 60% of the women reported their debts had been impacted by rising energy and rising food prices, 75% reported their debts had been impacted by changes to social security.
- 72% said they were negatively impacted by being in debt, mainly around mental health/wellbeing, 47% said their children had been negatively impacted by their debts.
- It was clear that living on benefits or in low paid work often did not provide enough income for women to afford the essentials/meet household bills without resorting to debt.
- Issues with Universal Credit particularly the five-week wait and the repayment of Advance Payments causes financial hardship and encouraged debt.
- The rising cost of living is putting increasing pressure on women's budgets leaving them more vulnerable to debt as they struggle to make ends meet.
- Women often went without food, clothes and heat themselves to make sure their children were provided for.

More recent research by the Women's Regional Consortium on the impact of the Cost-of-Living Crisis on Women<sup>4</sup> has shown that many women are struggling to afford the most basic of items including food and energy bills during this Cost-of-Living Crisis. This research found that:

- 96% of the women felt their financial situation was worse than it was in the previous year.
- 91% of the women reported difficulty paying their bills as a result of cost of living increases.

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<sup>3</sup> Women Living With Debt, Women's Regional Consortium, 2022  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

<sup>4</sup> Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium, June 2023 <https://www.womensregionalconsortiumni.org.uk/research/>

- 91% of the women felt that the Cost-of-Living Crisis had impacted on their physical or mental health or both.
- 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.

The research clearly shows the disproportionate harm that the Cost-of-Living Crisis is having on women and children. Women shared their experiences of not being able to buy basic foods including baby formula and healthy food, particularly fresh fruit and vegetables, having to use food banks, eating out-of-date food and going without meals altogether.

Many of the women also reported suffering from poor mental and physical health as they strive to protect their children from the significant toll that the economic crisis is having on their lives through missing meals, living in cold homes and getting deeper and deeper into debt. Women are having to make torturous decisions around feeding themselves and their families and heating their homes. Often they are faced with no other choice but to go without themselves to make ends meet and the stark reality is that they are unable to live dignified, healthy lives.

Due to the fact that women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time, or precarious work and more likely to have responsibility for managing household budgets and paying household/children's bills they are more likely to need to access Discretionary Support if they are unable to make ends meet. This is evidenced by the statistics outlined in the EQIA document which show that 67% of those in receipt of Discretionary Support Grants are women.

The Department's own statistics show that women are more likely to access the Discretionary Support Scheme. There are a number of reasons why women are more likely than men to find themselves in financial precarity, a number of which, such as the cost of and inaccessibility of childcare, and the greater likelihood of women to find themselves in low-paid, precarious work, are identified as urgent areas for us to address in the work undertaken towards a Gender Equality Strategy for Northern Ireland<sup>5</sup>.

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<sup>5</sup> Gender Equality Strategy Expert Advisory Panel Report, Department for Communities, 2020  
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

| Gender     | Number | Percentage |
|------------|--------|------------|
| Female     | 19,777 | 66.99      |
| Male       | 9,637  | 32.64      |
| Non-binary | 60     | 0.2        |
| Other      | 47     | 0.16       |

## 4.2 Impacts on UK international obligations

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<sup>6</sup>.

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>7</sup> to Concluding Observations on the UN Convention on the Rights of the Child, for which the UK was examined in May 2023<sup>8</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,

<sup>6</sup> See [International Covenant on Economic, Social and Cultural Rights](#) for a discussion of both principles

<sup>7</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>8</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](#)'

and a key recommendation is 'to put protections in Northern Ireland on an equal footing with those in England, Scotland and Wales'<sup>9</sup>.

The CEDAW Concluding Observations also urge action to redress the impacts of austerity and welfare reform, in particular the two child limit, which it has found to be against CEDAW principles. The Committee on the Rights of the Child, meanwhile, has recommended that the Northern Ireland budget is scrapped, due to the severe impact on children and young people.<sup>10</sup>

The likely impact of the proposed reduction in Discretionary Support Grant is to reduce realisation of rights set out in CEDAW, in particular in relation to the ability of women and girls to have access to adequate social protection systems<sup>11</sup>. This is also a basic entitlement in the International Covenant on Economic, Social and Cultural Rights (ICESCR)<sup>12</sup>, which defines destitution as a violation of the inalienable human rights of every individual. It should be noted that the UK will be examined under both ICESCR and CEDAW over the next 18 months, and that the need to address and mitigate the increasing poverty, inequality and destitution following austerity and welfare reform has been highlighted across UN human rights treaty bodies in recommendations to the UK from previous examinations.

## **5. Response to Survey Questions**

### ***1. Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 3 of the EQIA consultation document? If so, what are they and can you provide details?***

There are a number of issues with how this EQIA has been approached and many of these are as a result of the approach taken towards collating and analysing data, which has resulted in some realities being overlooked in the analysis. There is no intersectional analysis provided which hides the true extent of budget impacts on protected groups and the multifaceted ways these impacts are felt. Further, rather than identifying impacts and potential mitigation measures, this EQIA merely lists impacts and provides no suggestions for mitigations.

The analysis offered here is weakened by the fact that it is drawn exclusively from the most recent data as to who has accessed the Discretionary Support funds, without

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<sup>9</sup> CEDAW Committee (March 2019) [Concluding Observations on the 8<sup>th</sup> periodic report of the UK](#)

<sup>10</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](#)'

<sup>11</sup> CEDAW [Article 11](#)

<sup>12</sup> [International Covenant on Economic, Social and Cultural Rights](#) 1976



recognising that there are several people in need of the funds who are unaware of them. Research from the Women's Regional Consortium has shown that there are many people who are or have been unaware of all the supports that are available to them in times of crisis:

*"In NI, there is a lack of awareness of sources of financial support such as 'Discretionary Support' (DS) which provides short-term financial support for people in severe financial hardship, the 'Universal Credit Contingency Fund' (UCCF) which can support people through the five week wait and the 'Adviser Discretion Fund' (ADF) which can be used to access funds to pay upfront childcare costs. The opaque names of the schemes, which do not describe what they provide, is viewed as a constraining factor in ensuring those who are in greatest need can access the support. There is also a lack of consistent communication from Government departments, which means that the knowledge is not being effectively communicated to those who need it most, creating scope for misinformation and a lack of awareness."*<sup>13</sup>

Therefore, it is likely that, if there was more awareness among all communities and especially the most marginalised, applications to the fund would be higher, and therefore the data would suggest different impacts. In addition, as the Cost of Living Crisis deepens and we move into a second winter, there will be people applying to the fund for the first time who will not be represented in this data; as data sets obviously shift over time.

We urge the Department to look at a wider data set, including data on those most likely to experience poverty and those who are currently paid least. This may result in a different analysis, including a reconsideration of the surprising conclusion reached in this EQIA that the changes proposed will have a greater impact on those without dependents. It is clear from both the government's data and independently gathered data that lone parents with child dependents (of which 93% are women) are most likely to experience poverty.<sup>14</sup> If this part of the population were more aware of the assistance that is available to them, demand is likely to rise from people with dependents.

Therefore in addition to the data already included we urge the Department to consider also the data contained in the following reports:

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<sup>13</sup> Women's Regional Consortium, Women's Experiences of the Cost of Living Crisis, 2023. Available at: <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf> p.13

<sup>14</sup> Save the Children, Ten Years Too Long: A Decade of Child Poverty in Northern Ireland report. Available at: [https://www.savethechildren.org.uk/content/dam/gb/reports/ten\\_years\\_too\\_long\\_a\\_decade\\_of\\_child\\_poverty\\_in\\_northern\\_ireland.pdf](https://www.savethechildren.org.uk/content/dam/gb/reports/ten_years_too_long_a_decade_of_child_poverty_in_northern_ireland.pdf)

- Gender Equality Strategy Expert Panel Report<sup>15</sup>
- Anti-Poverty Strategy Expert Panel Report<sup>16</sup>
- WPG NI COVID-19 Feminist Recovery Plan (2021)<sup>17</sup>
- WPG Primary Research Report: The Impact of COVID-19 on Women: Putting Women's Voices at the Core<sup>18</sup>
- The Consequences of the Cuts to Education for Children and Young People in Northern Ireland<sup>19</sup>
- Women's Regional Consortium Research on Women's Experiences of the Cost of Living Crisis in Northern Ireland<sup>20</sup>

This EQIA should also sit alongside a RNIA that takes account of the greater impacts for those who live in rural communities. We have no way of making full assessments of negative impacts of changes without the full picture of those impacts. They should always be done alongside each other so that the impacts can be considered in full.

With regards to the data that is considered, there is a failure to consider that many people fall into multiple protected groups under Section 75 and will therefore be impacted in unique ways depending on what groups these include. We know, for example, that women are especially negatively impacted, and that people with disabilities will be especially negatively impacted. It follows that women with disabilities will be especially impacted twice over, and this kind of compounded impact must be taken into account by way of applying an intersectional analysis to this data. This issue will be expanded upon in response to Question 2 below.

Moreover, this document acknowledges that the proposals will have a "significant" adverse impact on women, and yet it offers no mitigations to avoid these impacts. This rather misses the purpose of an EQIA process, which is not simply to identify

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<sup>15</sup> 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>

<sup>16</sup> Anti-Poverty Strategy Expert Advisory Panel Report (2020) Available at:

<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf>

<sup>17</sup> 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>

<sup>18</sup> 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>

<sup>19</sup> The Consequences of the Cuts to Education for Children and Young People in Northern Ireland (2023) Available at:

<https://www.stran.ac.uk/wp-content/uploads/2023/06/The-Consequences-of-the-Cuts-to-Education-for-Children-and-Young-People-in-Northern-Ireland-Final.pdf>

impacts, but to mitigate against adverse impacts when they are identified. This issue will also be explained in more detail in our response to Question 2 below.

***2. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in Section 4 of the EQIA Consultation document? If so, what are they?***

There are likely to be adverse impacts both arising from the fact that limited data was considered, and from the manner in which the data was considered, without considering how belonging to various demographics at once will mean that some people will be negatively impacted in multiple ways, rather than in just one way. This approach, known as intersectionality, could have made clear to the Department that some choices are beyond consideration because the impacts will be too great on some of the most vulnerable people in Northern Ireland.

As covered in detail in response to Question 1, appropriate data should have been considered that measures both the objective need within various demographics alongside data on who actually accesses the Discretionary Support fund. Quite obviously there are barriers to applying, even if these are barriers due to lack of information, because some groups that we know to be especially vulnerable to poverty, most notably lone parents, are not accessing the fund as much as would be expected. This is not a reason to conclude that those most impacted will be single people without dependents, rather it is a reason to conclude that this fund is not reaching the most vulnerable to poverty. The lessons from this should be both to increase the data pool when examining the evidence, and to increase public awareness of the fund.

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>21</sup>, with lone parents suffering more than most. Policy makers know that most single parents are women, 93% in Northern Ireland.

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<sup>21</sup> 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/IFDebt/WomenAusterity/WBG.pdf>

The Gender Equality Strategy Expert Panel report<sup>22</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>23</sup>*

The choice to take a position of gender neutrality as well as the choice not to carry out an intersectional analysis on the data found is especially disappointing from the Department for Communities, which has responsibility for all Social Inclusion strategies including the Gender Equality Strategy. As such it has commissioned the Expert Panel Report quoted above, and worked closely with the Co-Design Group for that Strategy for over two years. Several member organisations of the WPG and the WPG itself was represented on that group, and throughout the process we reiterated repeatedly the need for gender disaggregated data, for a gender-sensitive approach to interpreting data, and for intersectional approaches.

The fact that this has not been adopted in the approach to an EQIA, of all things, at this most critical time for the livelihoods and survival chances for women and for those whose identities mean that they face multiple intersecting barriers. These can vary from their rural location, their disability, their sexual orientation, their gender identity and the fact that they have dependents. These kinds of policy decisions and budgetary measures need to be understood as things that impact on the whole lives of people - not one part of their identity at a time, but the whole person, all at once. With that kind of an approach, policy and budget choices can, and should, raise

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<sup>22</sup> Gender Equality Strategy, Expert Advisory Panel Report, December 2020 [Gender Equality Strategy \(communities-ni.gov.uk\)](https://communities-ni.gov.uk)

<sup>23</sup> 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](https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1_Global/INT_CEDAW_GEC_3733_E.pdf)

warning flags that then, in turn, should halt proposals that will enormously impact some people, at enormous personal cost.

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.

***3. Please state what action you think could be taken to reduce or eliminate any adverse impacts in the allocation of the Department's Discretionary Support grant budget.***

The options presented do not represent a meaningful choice and we cannot advocate for either approach in good conscience. Both will lead to harm and suffering for groups that already face systemic and structural disadvantage and inequality.

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>24</sup>. We cannot afford to continue making decisions at the expense of women and risk further degradations to gender equality and additional intersecting inequalities 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>25</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

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<sup>24</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/>

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>25</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. Are there any other comments you would like to make in regard to this proforma or the consultation process generally?***

As stated above we are acutely aware that these difficult decisions are made against a backdrop not of the Department'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, but it does not 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.

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 Department for Communities is a key part of the social security system, and a bridge between the Government and Community and Voluntary sector - and, indeed, the people it serves. In this position, we urge the Department to take seriously the disproportionate impacts that the changes to this Fund will have on the most vulnerable in society, alongside the wider package of cuts. This will be compounded by the impact that other cuts to core services will have on the Community and Voluntary sector; the part of our society that always steps into the gap and serves the most vulnerable when crisis arises.

If there ever was a time of crisis for these vulnerable people, this is it. The Department has an opportunity to do all that it can to preserve these communities, and this EQIA can be the first step in doing so.

## **6. Concluding Remarks**

The Discretionary Support fund supports those who need it most at their time of greatest need. If anything, it is under-utilised by those who most need it, and therefore awareness raising measures are necessary. We recognise, again, the difficult circumstances faced by the Department that has led to this review and reconsideration of the scope of the fund, and we are grateful that the fund will continue in some form.

The need for these cuts, alongside other cuts made to the Department's budget, and to the budget of every Department, stems from the Budget laid out by the Secretary of State, and we urge Departments as a collective to work to mitigate the damage caused by the cuts made on a collective basis. In our work as the Women's Policy Group it is clear that women will be impacted by all Departmental cuts, as will people with disabilities, and people living in rural areas. This demands a collective response. For our part, we are joining with colleagues across sectors in civil society to lobby the Secretary of State with regard to this punishing budget.

Finally, we reiterate again the need for a gender-sensitive approach to all policy making including all budget-setting decisions. Gender budgeting would eliminate the need for the kinds of arguments set out above, because if this approach was taken at the outset and steps were taken to ensure that women were not disproportionately disadvantaged, it would not be necessary for us to lay out objections and concerns on the grounds that negative impacts were identified but not mitigated.



ENDS

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

- Elaine Crory, Women's Sector Lobbyist at WRDA: [elaine.croory@wrda.net](mailto:elaine.croory@wrda.net) or
- Aoife Mallon, Women's Sector Lobbyist Policy Assistant at WRDA: [aoife.mallon@wrda.net](mailto:aoife.mallon@wrda.net)