

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

## WPG NI Response to the Department of Finance Consultation on Revenue Raising Measures

17th January 2024

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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.

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
- Siobhán Harding - Women's Support Network
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- Sophie Nelson - HERe NI
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- Caoímhe McNeill - UNISON
- Jonna Monaghan - Women's Platform
- Robyn Scott – CAJ

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 Regional Consortium.

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

The WPG, and its associated member organisations, have published a wide range of evidence through various evidence submissions, public consultation responses and specific briefings on issues relating to the impact of the budget cuts on people in Northern Ireland. Responses made by the WPG, and some of our members, in relation to these issues include:

- WPG NI (2023) Response to DfC EQIA on Changes to the Discretionary Support Scheme. Available [here](#).
- WPG NI (2024) Response to DoH Consultation on the re-introduction of hospital parking charges. Available [here](#).

The Women's Policy Group NI also responded to all of the 2023-2024 Budget EQIAs published by NI Departments in 2023. These responses included:

- WPG NI Response to The Department for Education Spending Plans EQIA – August 2023. Available [here](#).
- WPG NI Response to The Department for the Economy's Spending Plans for 2023–2024 Equality Impact Assessment – June 2023. Available [here](#).
- WPG NI Response to the Department of Health's Spending Plans for 2023–2024 Equality Impact Assessment – June 2023. Available [here](#).
- WPG NI Response to Department for Infrastructure's Spending Plans for 2023–2024 Equality Impact Assessment – June 2023. Available [here](#).
- WPG NI Response to the Department for Communities' Spending Plans for 2023–2024 Equality Impact Assessment – June 2023. Available [here](#).
- WPG NI Response to The Executive Office's Spending Plans for 2023–2024 Equality Impact Assessment – June 2023. Available [here](#).

Other relevant publications produced by the Women's Policy Group in recent years include:

- WPG 'Where's Our Democracy?' Campaign (2023) Common Sense Budget for Northern Ireland. Available [here](#).
- WPG Letter with Cross-Party Support to Secretary of State (August 2023) The Impact of Budget Cuts. Available [here](#).
- WPG Letter to Secretary of State (May 2023) The Impact of Budget Cuts. Available [here](#).
- WPG (2022) Open Letter on the Cost of Living Crisis in Northern Ireland. Available [here](#).
- WPG (2021) Relunched WPG COVID-19 Feminist Recovery Plan. Available [here](#).
- WPG (2020) Original WPG COVID-19 Feminist Recovery Plan. Available [here](#).

### 3. General Comments on the Revenue Raising efforts

Northern Ireland is facing yet another financial crisis. As of January 2024, we are nearly 2 years without an Executive and more than 14 months without Ministers. In 2023, the Secretary of State imposed an extremely punishing budget on the people of NI, with spending decisions overseen by Permanent Secretaries that we cannot hold to account. The budget for 2024 is expected to be similar, and now the Secretary of State has asked the Permanent Secretaries to find ways of raising revenue. This is unfair, undemocratic and financially unsustainable.

The 2023 budget cuts have already had a devastating impact on organisations and communities in Northern Ireland. The Secretary of State has argued that the cuts had to be made in order to repay public debt, but the impact of the cuts will not save money. Instead, they will worsen people's quality of life and their health and, in turn, increase dependence on the public purse.

Cutting government spending and implementing revenue raising measures during a financial crisis will not save the government money, it will cost the government more in the long term and have disproportionate impacts on the most vulnerable communities. Asking Northern Ireland to generate additional revenue at a time when our public services are on their knees will not lead to economic prosperity, it will simply plunge the most vulnerable communities further into poverty. Savings to the public purse should not be made on the backs of people in Northern Ireland who are already struggling to make ends meet.

Northern Ireland is experiencing both a cost of living crisis and a crisis of democracy, at a time when having a government in place has never been more important. We are calling on Departments to resist the implementation of revenue raising measures and listen to the voices of communities in Northern Ireland who will bear the brunt of the financial hardship that will come with reducing funding for public services. To find out more about the need for common sense to be applied in regards to the NI budget, you can read the 'Where's Our Democracy?' Campaign's 'Common Sense Budget (2023) [here](#).

#### 3.1 Super-parity

Super-parity is the argument that the Secretary of State is using when seeking to raise revenue. The argument may seem simple; "why should Northern Ireland be better off than Great Britain in these ways?" but it's not as simple as it first appears. Many of the differences are there because we recognise that NI is systematically disadvantaged in comparison with GB, and the Executive has made decisions as to where to direct the Block Grant in order to subsidise these areas. Areas where NI has super-parity include:

domestic water charges, welfare reform mitigations, university tuition fees, concessionary transport fares and charges for domiciliary care.

### **3.2 Sub-parity**

Sub-parity is rarely, if ever mentioned in these discussions. This refers to areas where Northern Ireland receives comparatively less spending than GB. Areas where NI has sub-parity include: childcare, mental health spending, public sector pay.

All of these choices are policy choices, like any other: they are not written in stone. There is room to deviate from practice in GB. And yet, the room to manoeuvre is limited while the block grant remains as it is. This is why, as we begin a process of public consultations on “revenue raising measures” that put every one of the areas of super-parity on the chopping block, we must fight to ensure that we do not end up in even more areas of sub-parity.

We must also fight to have the block grant increased to reflect the degree of need in Northern Ireland and its unique situation and circumstances. We note also that the areas of sub-parity are areas that especially impact the most vulnerable and, particularly in the case of childcare, women. Women are much more likely not to be in paid work in Northern Ireland specifically because of caring responsibilities, so failure to act on this contributes directly to the welfare of the NI economy.

We are calling for an approach to this exercise that recognises that restricting people's choices not only harms them, but also harms the economy as a whole. Years of underfunding, short-term budgets, and ‘quick-fix’ responses to structural crises have left our public services vulnerable. The punishing 2023 Budget, implemented by the Secretary of State to Northern Ireland, has only exacerbated this, putting our basic public services on the brink of collapse.

### **3.3 Fiscal floor**

In November, we recommended the introduction of a needs-based funding floor for Northern Ireland, similar to that which is in place in Wales. This would ensure that the funding floor for Northern Ireland is calculated at a needs-based level that the Block Grant can not dip below - with the aim of correcting the underfunding of public services. We note that this recommendation was part of the package offered to political parties by the Secretary of State in December 2023. We welcome this offer and remain hopeful that this package will be accepted by all parties and mark a positive change to the way Northern Ireland is funded.

Northern Ireland's needs are significant; while Northern Ireland is one lowest contributors to revenue per head in the UK<sup>1</sup>, it has the highest per capita spend<sup>2</sup> at £118 identifiable expenditure on services per head<sup>3</sup>. However, this spend used to be greater before the pandemic, at £121 per head. Northern Ireland is the only nation to have not returned to or increased its pre-pandemic services per head spend. The NI Fiscal Council predict that this 'Barnett Squeeze' will worsen in Northern Ireland if there are no interventions<sup>4</sup>.

Northern Ireland is a 'low-wage' economy, with the highest rate of economic inactivity across the four nations. We have the highest uptake of Universal Credit and equivalent legacy benefits in the UK and more people cutting back on essentials than anywhere else in the UK. While spending may seem quite high relative to England and the other devolved nations, it is because the need in Northern Ireland warrants it. The Barnett Formula was never meant to be a permanent fixture to determine devolved spending<sup>5</sup> and if reforms can be made to rightfully protect Wales from underfunding, those same reforms can be made for Northern Ireland.

### 3.4 Programme for Government

For the past two financial years, Departments in Northern Ireland have been making decisions without Ministers, an Executive, and a Programme for Government (PfG). The last PfG - a draft document that was taken on by the Senior Civil Service - provided Departments and the public with a framework for some overall policy direction during a time with no government. Without a PfG, we have seen departmental overspends and a general lack of direction of resources. Budgeting without a guiding document like a PfG is bad practice, as the Budget needs to be informed by policy objectives, not the other way around<sup>6</sup>. In the midst of multiple crises, we need a PfG to guide a cross-departmental approach to budget decisions, specifically around maintaining public services.

A PfG also provides transparency for the public and allows for proper scrutiny. These crucial aspects of good budgeting have been absent in our budgeting process, especially in the most recent Budget set by the Secretary of State. Without a PfG, there

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<sup>1</sup> Office for National Statistics. (2022). *Country and regional public sector finances, UK: financial year ending 2021*. (<https://www.ons.gov.uk/economy/governmentpublicsectorandtaxes/publicsectorfinance/articles/countryandregion/publicsectorfinances/financialyearending2021>)

<sup>2</sup> Pigeon, C. (2012). *Pros and Cons of the Barnett Formula for Northern Ireland*. ([http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2012/finance\\_personnel/2912.pdf](http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2012/finance_personnel/2912.pdf))

<sup>3</sup> HM Treasury. (2023). *Public Expenditure Statistical Analyses 2023*. ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1171658/E02929310\\_HMT\\_PESA\\_2023\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1171658/E02929310_HMT_PESA_2023_Accessible.pdf))

<sup>4</sup> Ibid.

<sup>5</sup> Simon Hoare MP, Northern Ireland Affairs Committee. (2023). *The funding and delivery of public services in Northern Ireland - Oral evidence*. (<https://committees.parliament.uk/oralevidence/13777/pdf/>)

<sup>6</sup> OECD. (2002). *OECD Best Practices for Budget Transparency*. (<https://www.oecd.org/mena/governance/efficient-and-effective-budgeting.htm>)

is no mechanism for public engagement on the policies aligned to the Budget's resources. The only consultation that was given on this Budget was regarding the Equality Impact Assessments/equality screenings, which did not provide much scope for influencing policies so much as mitigating the worst of the impacts.

While a PfG will not be possible to sign off on without an Executive in place, a draft governance document to guide the direction of next financial year's spend, with the input of public consultation, is necessary to follow good budgeting practices.

### **3.5 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. 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. The benefits of gender budgeting would also help to improve the budgetary process as a whole.

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.

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 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.

### 3.6 Invest to save

The concept is simple; spending money now will save money in the long run, and the proposals we have set out below propose ways to save that involve an initial outlay. We all understand this concept in the management of our household budgets, although of course many of us simply do not have the financial freedom to spend in order to save in the long term. This is famously well-illustrated by the author Terry Pratchett in his book *Men at Arms*, as the character Sam Vimes reflects on how expensive it is to be poor:

*"The reason that the rich were so rich, Vimes reasoned, was because they managed to spend less money. Take boots, for example. ... A man who could afford fifty dollars had a pair of boots that'd still be keeping his feet dry in ten years' time, while a poor man who could only afford cheap boots would have spent a hundred dollars on boots in the same time and would still have wet feet."*<sup>7</sup>

We must always remember that the government budget is not the same as a household budget, and our domestic financial hard choices are not the same as the choices they face, armed with a significant pot of public money and the means to borrow without the same kind of restrictions that we face as individuals. If and when it is deemed necessary, money can be found for investment; in major infrastructure projects, for example, or in the case of emergencies like the Covid furlough scheme. The government is not forced, like Sam Vimes, to make choices that they know are a false economy due to a lack of options; when they choose to do so it is always a choice. Today we are calling on them to make a different, and better, choice.

We are calling on the government to 'spend-to-save' - a simple concept where investing money into preventative measures now will save the government from spending money in the future fighting the fires that could have been prevented or mitigated in the first place. The single-year budget cycle paired with short-term policy focuses have led to responsive spend that may cost less at the time but in the long-term will add up in comparison to sustainable, preventative investment.

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<sup>7</sup> Pratchett, Terry (1993). *Men at Arms*. London: Gollancz. p. 32



Revenue raising measures, like the reintroduction of hospital parking charges, water charges, prescription fees and increased student fees, will not raise enough to cover the overspend nor cover the funds needed to deliver good public services. Additionally, the projected revenue raised from many of the recommended revenue raising measures will not happen within months of implementation but within years, while the impact of these charges on those struggling financially will be felt immediately. The implementation of the revenue raising measures will also not be a cost-free policy decision. There will be administration costs associated with delivering the agreed revenue raising measure, which may be equal to or more than the revenue generated.

Ultimately, this is a short-term decision in response to the current budget crisis. It will not solve the budget crisis, but it will cause further economic burden on those struggling the most. We must realise that spending-to-save is not an idealistic approach to budgeting, but a necessary one.

### **3.7 Women's Ability to Pay for Proposed Charges**

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

These existing gender inequalities have been worsened by the Covid19 pandemic<sup>8</sup>, a decade of welfare reform and austerity policies that have hit women harder<sup>9</sup> and now the Cost-of-Living Crisis is compounding the worsening situation for women. The impact of all these issues coming together has helped to create a perfect storm where women on the lowest incomes are struggling to meet their most basic needs, having to access foodbanks and expensive credit to afford essential items. This raises grave concerns for future generations and the costs and impacts to individuals, communities, the economy, education and health.

Women often bear the brunt of poverty in the home managing household budgets to shield their children from its worst effects. This means that women end up acting as the 'shock absorbers' of poverty going without food, heat or clothes in order to meet

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<sup>8</sup> NI Covid-19 Feminist Recovery Plan: Relaunch One Year On, Women's Policy Group NI, July 2021.

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

<sup>9</sup> Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017. <http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

the needs of children and/or other family members when money is tight<sup>10</sup>. These actions taken by women are often unseen within the home and given little attention or focus in terms of policy. Indeed, this has not been acknowledged in this consultation even though many women are likely to be considerably impacted by many of the proposed measures in this consultation and in other revenue raising consultations.

The following paragraphs highlight how women have been impacted by welfare reform and austerity policies, a constrained budget for Northern Ireland, the impact of debt and the Cost-of-Living Crisis. The points made in the following paragraphs should be considered in identifying the gendered impacts across the full range of revenue raising consultations.

### ***3.7.1 Welfare Reform/Austerity Policies and Women***

The safety net provided by the social security system has been weakened by a decade of welfare reform changes meaning that many people are unable to meet the costs of essential items such as food, heat and clothing and are unable to cope with unexpected life events such as a washing machine breaking down. Welfare reform and austerity policies have disproportionately impacted on women. Research by the House of Commons Library shows that 86% of the savings to the Treasury through tax and benefit changes since 2010 will have come from women<sup>11</sup>.

In Northern Ireland an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)<sup>12</sup> showed that across most income levels the overall cash impact of the reforms is more negative for women than for men. Their most striking finding was that households with children experience much larger losses as a result of the reforms than those without children. This is particularly the case for lone parents (who are mostly women) who lose £2,250 on average, equivalent to almost 10% of their net income.

### ***3.7.2 Universal Credit and Women***

There is substantial evidence that Universal Credit, and in particular problems with the five-week wait at the start of a Universal Credit claim, are causing widespread financial hardship, debt and increased reliance on food banks. Women's Regional

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<sup>10</sup> A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women's Budget Group, February 2019. <https://fabians.org.uk/a-female-face/>

<sup>11</sup> Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017. <http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

<sup>12</sup> Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019. [https://www.nihrc.org/uploads/publications/Final\\_CIA\\_report\\_Oct\\_2019.pdf](https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf)

Consortium research on the Impact of Universal Credit on Women<sup>13</sup> painted an overwhelmingly negative picture of life for women living on Universal Credit fraught with financial insecurity, worry, debt and in some cases cold and hunger.

The research found that almost all of the women reported negative impacts due to the five-week wait for Universal Credit. Many had needed to borrow money from family members/friends (61%) or lenders (25%) to survive. Some had been forced to cut back on food/essentials to make ends meet (53%) and others had resorted to selling their possessions (18%) or using a foodbank (21%). Others had reported getting behind with their bills (42%) and sadly some of the women reported that the five-week wait had impacted negatively on their children (39%) or that they had felt cold/hungry (30%) due to a lack of money.

### **3.7.3 Discretionary Support and Women**

Changes to the Social Fund as a result of welfare reform have meant that there is less help available through the social security system for those with extreme, exceptional or crisis situations. Since the Social Fund has been replaced by Discretionary Support (DS) there has been a weakening of this safety net for the most vulnerable borrowers meaning that it no longer provides the support it once did.

Funding cuts across Departments as a result of a constrained Budget imposed by the Secretary of State for Northern Ireland has seen further cuts to Discretionary Support with a reduction in the funding available for Discretionary Support grants to £20m in 2023-24 from £40.3m in 2022-23<sup>14</sup>. The Department for Communities emphasises that this cut will reduce the number of times and/or circumstances where help can be made available for those suffering financial hardship.

Statistics show that 67% of those in receipt of Discretionary Support Grants are women. Reducing access to this important source of crisis help will therefore be particularly detrimental for women who are already suffering great financial pain as a result of welfare reform and the impact of the Cost-of-Living Crisis. It will also mean that those on the lowest incomes and some of the most vulnerable households in Northern Ireland will be driven to expensive and sometimes dangerous forms of lending.

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<sup>13</sup> The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020. <https://womensregionalconsortiumni.org.uk/wp-content/uploads/2021/04/September-2020-The-Impact-of-Universal-Credit-on-Women.pdf>

<sup>14</sup> Changes to the Discretionary Support Scheme, Draft Equality Impact Assessment, Department for Communities, July 2023. <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-changes-to-the-discretionary-support-scheme-eqia.pdf>

### **3.7.4 Women and Debt**

Borrowing and debt is far from gender neutral. As women's incomes are generally lower over their lifetimes this leaves them more vulnerable to short-term financial problems or income shocks making them more likely to have to rely on borrowing and debt to make ends meet.

Research by the Women's Regional Consortium<sup>15</sup> on Women Living with Debt in Northern Ireland showed a significant amount of women reported having difficulty meeting their debt repayments and/or missing repayments (60%). The majority of the women's borrowing had been to fund essential items or to make ends meet. It also found that many (51%) had resorted to high-cost lending. The impact of the Cost-of-Living Crisis on women's debts was evident with 60% of the women reporting their debts had been impacted by rising energy prices and 60% also reporting their debts had been impacted by rising food prices.

Single parents are more likely to be impacted by financial hardship and debt. In Northern Ireland Census results show that the majority of single parent households are headed by a woman (93%). Research by the Joseph Rowntree Foundation<sup>16</sup> has found that single parents are by far the most likely of any family type to be struggling with poverty. Further research by the Joseph Rowntree Foundation<sup>17</sup> shows that the risk of living in very deep poverty has increased by a third for people in lone-parent families, to reach 19% or 900,000 people.

Low-income households are more likely to have to rely on high-cost credit as they are often unable to access cheaper forms of borrowing due to their low-income and/or other debts. Many of these borrowers are forced to use expensive forms of lending to buy essential goods and larger purchases they otherwise could not afford. This leaves these households vulnerable to exploitation through high interest charges, illegal lending and the likelihood of problem debt.

Some of the most vulnerable borrowers are forced into using illegal lending or 'loan sharking' because of a more urgent need for money. In Northern Ireland illegal lending is often linked with perceived paramilitary activity<sup>18</sup>. Research conducted by Advice NI on behalf of the Consumer Council<sup>19</sup> in Northern Ireland has highlighted

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<sup>15</sup> Women Living with Debt, Women's Regional Consortium, September 2022.m

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

<sup>16</sup> UK Poverty 2022, Joseph Rowntree Foundation, January 2022. <https://www.jrf.org.uk/report/uk-poverty-2022>

<sup>17</sup> Going without: deepening poverty in the UK, Joseph Rowntree Foundation, July 2022. [Going without: deepening poverty in the UK | JRF](https://www.jrf.org.uk/report/going-without-deepening-poverty-in-the-uk)

<sup>18</sup> Expensive Lending in Northern Ireland, Centre for Economic Empowerment, NICVA, May 2013.

[https://www.nicva.org/sites/default/files/d7content/attachments-resources/cee\\_expensive\\_lending\\_in\\_northern\\_ireland\\_2013.pdf](https://www.nicva.org/sites/default/files/d7content/attachments-resources/cee_expensive_lending_in_northern_ireland_2013.pdf)

<sup>19</sup> Illegal Lending – The Human Story, Advice NI, September 2019. <https://www.adviceni.net/policy/publications/illegal-lending-human-story>

that one of the themes around illegal lending is low income and lack of access to mainstream credit. Two pieces of research by the Women's Regional Consortium<sup>20</sup> with women in Northern Ireland found examples of borrowing through loan sharks including paramilitaries.

Research by the University of Ulster found that Universal Credit was repeatedly described as a driver for illegal lending<sup>21</sup> particularly around the harm caused by the five-week wait and issues with short-term benefits loans that were repaid from future benefits. This ensured that benefit claimants were often short of the funds they needed to support their household, leading them to look to other means of getting the money they needed.

An independent Review into Discretionary Support<sup>22</sup> has found that it provides an important source of borrowing for those on the lowest incomes and can help to divert people from illegal lending such as paramilitaries. The Review found that 11% of their survey respondents (19 out of 172) said they managed the impact of not getting a Discretionary Support award by borrowing from a local money lender.

### ***3.7.5 The Impact of the Cost-of-Living Crisis on Women***

Economic crises tend to hit women harder and the Cost-of-Living Crisis is no different. In February and March of 2023 the Women's Regional Consortium and Ulster University carried out research with 250 women in Northern Ireland on the impact of the Cost-of-Living Crisis on their lives<sup>23</sup>.

The findings from this research paint a stark picture of women's lives which are increasingly occupied with hunger, cold, debt, anxiety and concerns about the outlook for themselves and their children:

- 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>20</sup>Making Ends Meet: Women's Perspectives on Access to Lending, Women's Regional Consortium, February 2020. <https://womensregionalconsortiumni.org.uk/wp-content/uploads/2021/04/Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf>

<sup>21</sup> Women Living with Debt, Women's Regional Consortium, September 2022. <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>. Illegal Money Lending and Debt Project, Research Report of Findings, Ulster University and the Consumer Council, March 2020. [https://www.consumerCouncil.org.uk/sites/default/files/2020-07/Illegal\\_Money\\_Lending\\_Report.PDF](https://www.consumerCouncil.org.uk/sites/default/files/2020-07/Illegal_Money_Lending_Report.PDF)

<sup>22</sup> Independent Review of Discretionary Support, Department for Communities, February 2022. <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-independent-review-of-discretionary-support-22.pdf>

<sup>23</sup> Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023. <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

- The price increases reported as having the biggest impact on women's household budgets were increases in energy bills (90%) and increases in food bills (89%).
- Just over half of the women reported being in debt (56%) and of these 82% reported they had to borrow as a result of cost of living increases.
- 62% of the women reported they had been unable to save recently and 31% reported their savings had decreased. None of the women reported they had been able to increase their savings.
- The actions taken by the women to cope with cost of living increases were:
  - o 86% buying cheaper items;
  - o 81% cutting energy use;
  - o 55% using charity shops/second hand websites;
  - o 49% reduced the use of their car/public transport;
  - o 47% relying on friends/family for help;
  - o 43% skipped meals.
- 78% of the women had felt cold or hungry or both as a result of cost of living increases.
- 41% of the women had needed to use a foodbank/other charitable support due to increases in the cost of living.
- Many of the women were skipping meals, living in cold homes and going without other necessities such as clothing to protect their children and families from financial hardship and poverty.
- Lack of awareness around existing help through the benefits system meant that some women missed out on financial support that could have significantly helped their household budgets and emotional wellbeing.
- Rural women faced additional issues particularly around transport costs, lack of public transport, reliance on unregulated home heating oil, rising prices/availability of broadband, increased isolation due to cost of living pressures and less choice in terms of price/products when shopping in smaller, local shops.
- Women who were asylum seekers with No Recourse to Public Funds (NRPF) found it really difficult to cope with the rising cost of food (particularly healthy food), transport costs and children's costs. This meant that they often had to rely on charity or borrowing from friends/family to make ends meet.

### **3.7.6 Unpaid Care and Women**

Caring remains a gendered issue and it is still very much seen to be seen to be "women's work". According to the 2021 Census, there are over 220,000 people providing unpaid care in Northern Ireland. The Family Resources Survey shows that 57% of unpaid carers are women and 43% are men in Northern Ireland. A recent

consultation by the Department of Health<sup>24</sup> has proposed cuts to domiciliary care packages which will mean that more people, many of them women, may end up acting as unpaid carers for elderly or disabled family members.

Research from Carers NI in 2022 found that a significant number of unpaid carers were experiencing financial pressure and 1 in 6 said they were struggling with the cost of food<sup>25</sup>. Trussell Trust research shows that one in four people (27%) providing unpaid care for sick or disabled loved ones in Northern Ireland are experiencing food insecurity – more than twice the rate of non-carers (12%)<sup>26</sup>.

A report by the Carer Poverty Commission in Northern Ireland also showed that one in four unpaid carers in Northern Ireland are living in poverty which is significantly higher than the non-carer population (16%) and higher than the carer poverty rate in the rest of the UK (23%)<sup>27</sup>. It showed that carers are being driven to poverty by a combination of the high extra costs of caring for a sick or disabled person, barriers to employment and inadequate support from the social security system. This severe financial pressure is leaving carers struggling to afford the price of food, borrowing money from loan sharks, living in cold homes and relying on charity shops to get by.

Research carried out by the Women's Regional Consortium & Ulster University on the impact of the Cost-of-Living Crisis on women<sup>28</sup> highlighted the issues for those providing unpaid care. Around 28% of the women who took part in the research were providing unpaid care and it was clear that increases in the cost of living had put a strain on them causing them to struggle to make ends meet, to heat their homes adequately, to afford travel costs for medical appointments, impacting on what activities they can do with the person they care for and causing significant anxiety and stress.

*"I care for my mother who is 84 and immobile. Her heating has had to be on more and it is taking way more money for gas than it used to try to keep her warm enough. She has a hospital bed (she needs it because it's adjustable), a hoist, an electric cushion to stop her getting bedsores. All these extra electric things are running as well all day every day. Her electricity has really soared as well not just in terms of how much it is used but in the cost of it as well which is*

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<sup>24</sup> <https://www.health-ni.gov.uk/sites/default/files/consultations/health/doh-budget-egia-cons.pdf>

<sup>25</sup> State of Caring in Northern Ireland 2022, Carers NI, November 2022.

<https://www.carersuk.org/reports/state-of-caring-in-northern-ireland-2022/>

<sup>26</sup> [Hunger in Northern Ireland, Trussell Trust, June 2023. 2023-Hunger-in-Northern-Ireland-report-web-updated-10Aug2023.pdf. \(trusselltrust.org\)](https://www.trusselltrust.org/2023-hunger-in-northern-ireland-report-web-updated-10aug2023.pdf)

<sup>27</sup> The experiences of poverty among unpaid carers in Northern Ireland, the Carer Poverty Commission in NI, August 2023. <https://www.carersuk.org/media/jb0ah2xh/the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf>

<sup>28</sup> Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023. <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

*crazy. I'm trying to take her out an odd time for a wee break and change of scene but the money's just not there for it anymore."*

*"My son has a serious brain condition, he's in a wheelchair and has spinal, brain and kidney problems. We're filling our car up two or three times a week to travel to his hospital and care appointments. That broke things for us, the first time we have ever been in debt. It destroyed us. Nobody recognises this and we don't get any help for any of it. We have him every other weekend and the heat in the house has to be on 24/7 it's not easy. As far as food we only eat off the bargain shelves that's it."*

(Quotes from Focus Group participants in Women's Regional Consortium Research on the Impact of the Cost-of-Living Crisis on Women)

### **3.7.7 Lived Experiences of Women**

The voices of those in poverty are often missed in these discussions around revenue raising. We have raised in the preceding paragraphs how women's financial wellbeing has been impacted by a range of factors over the last number of years leaving those women on the lowest incomes struggling to afford the essentials and to be able to live dignified, healthy lives. It is abundantly clear from the wealth of evidence and research that many women and families are not in a position to be able to pay additional charges of any kind. Many of these women are already going without the essentials of life, including food and heat, to try and provide for their children and families. Asking these women to contribute to revenue raising is simply unconscionable.

The Women's Regional Consortium has a wealth of lived experience from women who have taken part in our research. This is extremely valuable in illustrating the precarious financial situation of many women and families at the present time. We include a selection of quotes from the women who took part in Women's Regional Consortium research on the impact of the Cost-of-Living Crisis to help Government understand the financial pressures women are facing and to ensure that their voices are front and centre of considerations around revenue raising. We also refer the Department to the addendum to the research paper: [Quotes from Women's Regional Consortium Focus Group Research on Women's Experiences of the Cost-of-Living Crisis](#). We urge the Department to consider this lived experience carefully in making any decisions around revenue raising:

*"We're not living, we're just existing."*



*"I don't understand them saying inflation is 10% sure the prices have doubled! Everything is going up more than that. Gas is the same it has at least doubled for me, I just can't get out of the emergency."*

*"I spent £30 on one bag of shopping which had about 6 items in it. It's shocking. We're all eating chicken strips and chips, that's all we eat for 4 days is chicken strips because I can't afford anything else."*

*"I've had to sit in a cold apartment which is causing damp. I've had to wash in cold water and go without food."*

*"I've had to skip meals to make sure my children eat or I just eat toast."*

*"I'm having to borrow for the way I normally live. I used to have a certain amount of money to cover my ordinary bills but that's not there anymore. I'll have another week until I get paid so I'll use my credit card to get whatever I need. It's all essential stuff, it's just for living."*

*"I had £400 saved and I had to go into it, it's gone. I put it away as a fund for my oldest. It's horrible going into your kid's money, I feel so guilty about it but we had to eat."*

*"The extras are all gone now, going out is a luxury, we were hardly able to do it in the first place. Even the special occasion treats are gone now like for birthdays, etc. There's no spare income for it now."*

*"I live off cereal or toast. My son is 17 months old and I'm starting to potty train him early to save money on nappies. You're having to start to do things earlier because of the price of things."*

*"I'm only heating the room I'm in which with a new baby isn't ideal. I'm cutting back and going out places so that I'm not having to use my own electric."*

*"I had to superglue the soles of my boots back together because they started talking to me. I walk a lot especially now as I can't afford the bus. I'm sewing my coats and missing meals, anything to save money."*

*"Our Government need to get back up on the hill [Stormont] to do more for people. Their people are struggling, on their knees, starving, cold. Why are they not up there fighting our corner?"*

*"Government need to increase benefits. There needs to be an increase in income whether people are working through a Living Wage and if you can't work on a benefits system that gives you enough of an income that you're able*

*to live and not struggle. At the minute anyone on benefits is existing they're not living."*

*"I don't think anyone recognises the impact of this Crisis on women especially. We have a high level of responsibility and it's impacting really badly and Government are not taking enough notice. People are suicidal and feel like a failure. I'm lying in bed at night and getting really bad intrusive thoughts to the point where I look at my daughter and think if something happens to me who will look after her? I asked the person in charge in my hostel to ring me in the morning and check if I'm OK. It's really, really impacting on people and Government need to be more aware of the impacts of this Crisis."*

*"My kids go to Breakfast Club in school and that's a godsend. If I didn't have that I don't know what I'd do. There are times I've went three or four days with very little to eat, maybe I'd grab an apple just so I have something in my stomach and I'm not going to bed with hunger pains and growling in my stomach."*

*"My pay does not stretch to cover food costs and fuel. We have been buying cheaper brands to make it through the month. I only put £70 in my car per month so going to see family who live 45 miles away is a no go, we can only do it once every few months."*

### **3.8 Impact on international human rights obligations**

As a context to more detailed comments, 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>29</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.

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<sup>29</sup> See [International Covenant on Economic, Social and Cultural Rights](#) for a discussion of both principles

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>30</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>31</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 footing with those in England, Scotland and Wales'.<sup>32</sup> The CEDAW Concluding Observations also urge for full implementation of the recommendations of the Inquiry into abortion legislation in Northern Ireland<sup>33</sup>, and note that action is required on the impact of welfare reform and poverty.

The likely impact of proposed revenue raising mechanisms, across Departments, is to reduce realisation of rights set out in CEDAW, in particular in relation to the ability of women and girls to fulfil their potential and have the widest range of future options available. For girls, this will have significant long term impacts, as women's earnings lag behind men's, and women disproportionately experience long term low income, with many unable to participate in the labour market due to caring commitments<sup>34</sup>[6]. Specifically, reductions in public services will increase women's poverty, as the caring and unpaid work burden on women will increase and will force many women to leave paid work, entrenching poverty including child poverty and intergenerational poverty.

### 3.8.1 Building on CEDAW

It would be helpful for CEDAW to be recognised in this work as an international obligation of the UK<sup>35</sup> that provides the framework for effective action on gender equality; across devolved administrations and policy areas. At a minimum, CEDAW recommendations should inform policy and decision making, to ensure decision making remains in line with international law and good practice on gender equality.

In short, CEDAW requires States Parties to implement a rights based agenda that ensures legislation, policies and programmes are non-discriminatory and focus on progressive realisation of equal rights for all. The Concluding Observations provide a

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<sup>30</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>31</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>32</sup> CEDAW Committee (March 2019) [Concluding Observations on the 8<sup>th</sup> periodic report of the UK](#)

<sup>33</sup> CEDAW Committee (February 2018) [Inquiry into abortion legislation in Northern Ireland under Article 8 of the Optional Protocol to CEDAW](#)

<sup>34</sup> See eg. NISRA (March 2022) [Women in Northern Ireland 2020-21](#) for an overview of income differences between men and women, and the reasons for these; family commitments are a key factor.

<sup>35</sup> [Convention on the Elimination of All Forms of Discrimination against Women](#) (CEDAW, 1979), articles 1 and 2. The UK signed the Convention in 1981 and ratified in 1986

roadmap for progressing gender equality, and the most recent set of recommendations emphasises access to justice and support for victims and survivors, as well as increasing action on prevention and culture change. Importantly, this covers action on ensuring equal access to support and protection for low income and marginalised women, who are at the greatest risk of long term poverty and associated harms.

Recognising CEDAW would also create effective links across Departments and strategies, which helpfully can act as a mechanism for creating a coherent framework for addressing gender equality. This, in turn, is vital, as the critical message of this response is that the disproportionate impact of cost of living increases on women is a result and expression of gender inequality and patriarchal norms, and cannot be sustainably addressed without action on gender equality in its widest sense.

#### **4. Response to Consultation Questions**

##### **Q1. Are there other revenue raising measures that should be considered?**

The WPG believes that it is not appropriate for us to make such recommendations and again opposes the introduction of revenue raising measures, particularly at this time, as people are struggling already to manage their costs in a cost of living crisis and after many years of financial hardship brought on by austerity measures. The WPG reiterates the arguments made in section 3 above, and we stress that women and marginalised communities are being most impacted by the cost of living crisis and by austerity, and will be hardest hit by any revenue measures also. Quite simply, as demonstrated by the lived experience of the women quoted in the Women's Regional Consortium's research above, people cannot afford these measures, and proceeding with them at this time will lead to deeper poverty for many and will drag more families into poverty.

Analysis by the Consumer Council for Northern Ireland on Discretionary Income<sup>36</sup> shows that 50% of Northern Ireland's households have less than £80 per week left over after all spending on essentials (see image below). Those in the lowest earning households at the bottom 25% of the income distribution (Quartile 1) have discretionary income of just £26.81 per week after spending on the basics. In this context, new revenue raising measures, particularly several measures arriving in a condensed time frame, are not only impractical - people will simply not be able to pay their bills, and expenditure will be generated in the efforts to collect debts, etc - but unconscionable.

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<sup>36</sup> Q2 2023 Northern Ireland Household Expenditure Tracker, Consumer Council for Northern Ireland, November 2023

If, in some cases, exemptions will be granted to some low earners and/or for people on certain benefits, the cost of implementing these exemptions will be significant, and the stress for those who already live on or below the poverty line will be significant. Many of the proposed revenue raising measures will take time to implement - water charges being an example - and by the time it begins to generate revenue will likely have taken significant funds from other parts of the economy as people reduce spending elsewhere to ensure they can pay this bill. The overall damage to the economy may far outweigh the benefits - while the harm caused by those who are already struggling will be very significant. Once again, women will suffer the most with the introduction of revenue raising measures, and as we have outlined above, are least well equipped to pay. Balancing the books on the backs of those suffering most from cuts and austerity policies is unacceptable. On the other hand, supporting those who are struggling will mean that they can spend more and actively contribute to the local economy.

Instead, the WPG proposes an entirely different approach to this issue, focused instead on supporting people to contribute to the economy and to their local economy in particular. This involves an approach of investing to save, and we have outlined much of this in section 3 above. We are calling on the government to 'spend-to-save' - a simple concept where investing money into preventative measures now will save the government from spending money in the future fighting the fires that could have been prevented or mitigated in the first place. The single-year budget cycle paired with short-term policy focuses have led to responsive spend that may cost less at the time but in the long-term will add up in comparison to sustainable, preventative investment.

Revenue raising measures, like the reintroduction of hospital parking charges, water charges, prescription fees and increased student fees, will not raise enough to cover the overspend nor cover the funds needed to deliver good public services. Additionally, the projected revenue raised from the majority of the various measures proposed to date will not happen within months of implementation but within years, while the impact of these charges on those struggling financially will be felt immediately. The implementation of the revenue raising measures will also not be a cost-free policy decision. There will be administration costs associated with delivering the agreed revenue raising measure, which may be equal to or more than the revenue generated.

Ultimately, this is a short-term decision in response to the current budget crisis. It will not solve the budget crisis, but it will cause further economic burden on those struggling the most. We must realise that spending-to-save is not an idealistic approach to budgeting, but a necessary one.

Measures that the Department could - and should - consider with regards to the cost of living crisis would be better if they focused on the root causes of inequality in society rather than seeking to take from the pockets of those who can ill-afford to pay. Corporation tax is low at present in comparison with the majority of our neighbours, despite the recent rate increase. This is the case on the premise that this low rate encourages inward investment and therefore increases Northern Ireland's economic output. This theory is not always borne out in reality; as the Institute for Public Policy Research (IPPR) puts it:

*"The way corporation tax cuts are justified goes something like this: the UK has low levels of productivity and low levels of capital investment, and both need to rise. By cutting tax rates, this reduces the tax bill of firms, putting money on their balance sheet that they will then invest in capital or research and development (R&D), which will result in economic growth. A secondary aim is that by having a 'competitive' tax rate (ie lower than comparable countries) the UK will be a more attractive investment destination.*

*The problem with this story is that it has not turned out like that. Whilst UK corporation tax rates have fallen since 2007, private sector investment is still amongst the lowest in the OECD, the lowest in the G7, and far below the average among developed economies. Corporate tax cuts have failed on their own promise."*<sup>37</sup>

In addition, Northern Ireland's persistent issues with political instability means that there are factors beyond its corporation tax rates to dissuade potential investors, and in fact our unique circumstances has made us attractive to investors for other reasons, with the US Special Envoy for Trade stressing in 2023 that renewed stability would bring greater US investment - triple the current amount - should institutions return<sup>38</sup>. In addition, some of the measures proposed in this raft of revenue raising measures - such as increasing student fees - may do more harm to inward investment than an increase in corporation taxes; Northern Ireland has a significant knowledge-based economy and we should not risk young people moving away for university and never returning.

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<sup>37</sup> Institute for Public Policy Research, 2022, Cutting corporation tax is not a magic bullet for increasing investment. Available at: <https://www.ippr.org/blog/cutting-corporation-tax-not-magic-bullet-for-increasing-investment>

<sup>38</sup> The Guardian, 19th April 2023, Hike in corporation tax will not deter US investors in NI, says Joe Kennedy III. Available at: <https://www.theguardian.com/uk-news/2023/apr/19/hike-in-corporation-tax-will-not-deter-us-investors-in-ni-says-joe-kennedy-iii#:~:text=Kennedy%20was%20asked%20by%20reporters,in%20the%20Republic%20of%20Ireland.>

**Q2. Are there any services/ programmes that should be stopped or reduced to divert funding to more critical services?**

Again, the WPG believes that it is not appropriate for us to make such recommendations and again opposes revenue raising measures, particularly at this time. We also oppose short-term approaches that will appear to save money in the short term but will be counter-productive in the long run and will lead to both an increase in costs elsewhere in the system, and to untold human suffering.

Our colleagues at Carers NI have made the following argument, with specific regard to domiciliary care measures:

*"In 2017, for example, a mandated process to identify budget savings in each Health Trust saw widespread proposals to cut domiciliary care packages; proposals which were eventually dropped following public opposition. While the details of the pending consultation on domiciliary care charges are still outstanding, Carers NI would be strongly opposed to any future reform which resulted in community care becoming less accessible to those who need it.*

*While such a move would undoubtedly save money in the short term, it would also be entirely counter-strategic – leading to more unmet need, greater rates of delayed discharge from hospital and even more pressure on an unpaid carer population that is already at breaking point.<sup>39</sup>"*

This makes the point concisely; and the same argument makes sense across a range of the currently proposed revenue raising measures; prescription charges may result in those most in need simply not filling their prescriptions, and requiring more intensive care or hospital care at a later date. Students facing an increase in fees may simply go elsewhere to study, resulting both in a total loss of revenue from that individual, and contributing also to a brain drain. A failure to treat wastewater will have public health and environmental impacts that can have a devastating impact on the economy. Short-term thinking is bad for the economy, and bad for individual people. Rather than an easy option or sensible economics, it should be seen as bad governance.

We recognise that, despite our best arguments, Departments may go ahead with cuts anyway. At this stage we stress that every one of these potential measures must be properly consulted on and subject to EQIA and RNIA that are available for the public to view before responding to the consultation. In addition, and in the interests of good governance, any changes should be fully costed in the long term as well as in the short

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<sup>39</sup> Women's Regional Consortium (2024) Response to DoF Consultation on Revenue Raising Measures.

term, for example choices that may generate small amounts of revenue now should be measured against the impact on the environment, on our commitments flowing from the Climate Change Act 2022, on public health, on the knowledge economy, and so on, long into the future.

Instead of asking ‘are there any services/ programmes that should be stopped or reduced to divert funding to more critical services?’ the Department of Finance should be asking: ‘How can we best support people living in Northern Ireland through the cost of living crisis and how can we allocate funds accordingly?’ At the very minimum, the Department should be asking themselves: ‘If we stop or reduce funding in these selected areas, how will it impact pre-existing inequalities and impact those who are already vulnerable and reliant on these services?’

### **Q3. Are there public services that could be delivered in a different way?**

Yes - the WPG believes that a great number of things could be improved about the way that our public services are designed and delivered. We believe that these improvements would help the Department realise its goals, outlined in its consultation document, of ensuring efficiency and transformation. In 2020, the Women’s Policy Group published a COVID-19 Feminist Recovery Plan<sup>40</sup> and relaunched this with updated evidence in 2021<sup>41</sup>. While these are lengthy documents, they are thorough in explaining how this recovery could be achieved. For accessibility, this publication was accompanied by briefing documents<sup>42</sup> which were sent to a number of committees and government departments and a webinar series<sup>43</sup>. We recommend that the Department familiarise themselves with this document in the context of this revenue raising consultation. An executive summary including all recommendations is also available<sup>44</sup>.

We have long accepted the need for transformation of services but at the same time we reject the idea that there is a need for revenue raising. We cannot make any revenue raising recommendations without all the relevant data and information which is available to government departments but not to the general public, but again we reiterate the need to invest to save in the long term, and that measures that

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<sup>40</sup> WPG (2020) Original WPG COVID-19 Feminist Recovery Plan. Available at: <https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>

<sup>41</sup> Women’s Policy Group NI, 2021 Feminist Recovery Plan: 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>42</sup> Women’s Policy Group, Key Briefings on the Feminist Recovery Plan: <https://wrda.net/covid-19-feminist-recovery-plan-briefing-papers/>

<sup>43</sup> Women’s Policy Group, Feminist Recovery Plan webinar series: <https://wrda.net/feminist-recovery-plan-webinar-series/>

<sup>44</sup> Women’s Policy Group NI, 2021 Feminist Recovery Plan: Executive Summary. Available at: <https://wrda.net/wp-content/uploads/2021/11/FRP-Executive-Summary-2021.pdf>



seek to take money from those who have suffered the most in recent years of austerity, Covid-19 and the cost of living crisis is unacceptable and untenable.

**Q4. Are there public services that could be delivered by others (e.g. local government, voluntary & community sector or private sector) or are there any other areas in which greater collaboration could deliver better outcomes?**

While these parts of society have unique strengths that should be recognised and rewarded, there is a real danger of outsourcing public services to these bodies without providing adequate financial and other supports that are absolutely necessary to deliver quality services. The community and voluntary sector can and does reach the most marginalised, but increasingly it finds itself “standing in the gap” and trying to pick up the pieces of the past decade of austerity, the consequences of the Covid-19 pandemic, and the ongoing cost of living crisis. It is also doing this on a shoestring budget, working in insecure circumstances and in many cases with no job security, operating often on annual contracts.

In short, we are facing the same increasing pressures as the public sector and being expected to deliver more with less. The proposal here, which appears to ask the sector to deliver more, has to be qualified and explained in more detail; if it is proposed as a revenue raising or money-saving measure, presumably the hope is that the community and voluntary sector can deliver the same service for less. Given the starkness of what this is implied by this calculation, it is not surprising that the sector and its staff feels that it is not valued or respected - to say nothing of being underpaid and taken advantage of. While greater collaboration would be welcome, this proposal smacks of passing on the responsibility without the necessary funding and structural support, such as long term contracts and the job security that comes with such contracts. In short, as it stands this proposal is unfair and untenable.

We also note that the Department of Communities is currently consulting on proposals for improving and strengthening relationships with the community and voluntary sector. The following quote has been taken from this DfC Consultation document:

*This document puts forward draft proposals to support a thriving Voluntary and Community Sector in Northern Ireland through a commitment to continued government investment in sector infrastructure and to improving the way that government works with and for the sector.<sup>45</sup>*

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<sup>45</sup> <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-voluntary-community-sector-infrastructure-support-framework-consultation.pdf>

Without the relevant financial resources and supports, this proposal risks contradicting that by leaning unduly on that sector without supporting it, which could lead to strained relationships between the public sector and voluntary and community sector going forward. The Department of Finance should work closely with the Department for Communities to assess the potential impacts of any future out-sourcing of public services to the sector, and the financial support that will be required in order to do so.

With regard to outsourcing services to local government, it is entirely likely that Councils in NI would probably welcome more responsibility but only with the relevant funding and powers to direct the work, rather than acting as a contractor for the government departments. Any such move would require robust mechanisms to ensure fairness to local government, and at the same time transparency and accountability to ensure the decisions happen with appropriate oversight and in full public view - particularly so in light of some controversial decisions by local Councils made behind closed doors in a way that would be unthinkable for the Assembly.

The WPG is firmly against the privatisation of public services, which appears to be what is implied by the suggestion that some public services should be delivered by the private sector. There is no reason, assuming that robust procurement policies are in place, that the private sector should be in a position to deliver these services at a lower cost than the public sector can, and there are a number of reasons to be very concerned that the use of public money to prop up private sector organisations will lead to profiteering at the expense of the public services that we pay for through our taxes.

The WPG is firmly in favour of greater communication between all government departments and collaboration across all the departments to deliver shared goals. This includes social inclusion strategies and other major pieces of work about the strategic direction of public policy in Northern Ireland that ideally should come from TEO and require all of the departments to pull in the same direction, along with their respective civil servants. Siloed thinking is part of the issue we have with this proposal; it seems to contradict some of what other departments are working on. We welcome greater collaboration with other sectors, but it has to mean more than syphoning off responsibility without the requisite support in place.

In addition, there is a need to standardise the equality and rural needs screening processes, and to standardise the manner of public consultation. Public consultations should run for a minimum of 12 weeks, any proposals should be subject to a full Equality Impact Assessment and Rural Needs Impact Assessment, they should be fully costed both in the long term and in the short term, and the questions and proposals therein should be easily understood by a lay person with no specific policy experience or knowledge. This is a minimum standard; ideally they should also be accompanied

by accessible public information sessions during which citizens can ask and receive answers to questions.

In 2017, WRDA produced a robust piece of work on this called Women at the Heart of Public Consultation<sup>46</sup>, which we recommend to all government departments and policy makers. Following this series of consultations, and indeed the sheer variety in quality of budget EQIAs produced by some government departments in 2023 on their budget proposals, the Women's Policy Group will be following up with all departments on the issues that need to be addressed in this process.

## 5. Additional Comments

To conclude, we fully understand the financial situation in which Northern Ireland finds itself, and the reasons why we are in this situation. We believe that these revenue raising measures overall are the wrong approach to take to the crisis, which instead needs a “spend to save” approach, rather than one that prioritises short term corner-cutting measures while deeper crises develop for future Ministers to deal with. It is not sustainable and not good fiscal policy. We have explained the alternatives in great detail in section 3.

In addition we have argued here that the revenue raising measures will have a disproportionate impact on those most marginalised and who can least afford to pay; those living in poverty, women including women in low-paid jobs, people with disabilities and those who live in rural areas. These groups of people are already suffering with the restrictions to income that flow from the cost-of-living crisis, and it is both unfair to balance the books on their backs which are already so overburdened, and it is ineffective.

On another note, it would benefit the Department, and indeed all Departments, as well as the public at large, if the questions asked in consultations like this were less vague and more specific. A member of the public will not necessarily know some of the things that policy workers will know, for example that the Department for Communities has a consultation open at present that seems to contradict some of the suggestions here. They also may not be able to draw on examples from other ongoing and upcoming consultations. There is little to “sink the teeth into” in this consultation, without considerable background knowledge and/or research. In practice this creates unnecessary barriers to participation that benefit nobody - including the Department itself who will have to sift through responses that will not be helpful.

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<sup>46</sup> WRDA, 2017, Women at the Heart of Public Consultation. Available at: [https://wrda.net/wp-content/uploads/2018/10/WRDA\\_WomenAtTheHeartOfPublicConsultation.pdf](https://wrda.net/wp-content/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf)

The Women's Policy Group NI strongly recommends that the Department rethinks its approach to this issue, and that other Departments join them in this rethink; there are better, fairer and more financially sound ways to approach the economy.

*ENDS*

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

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