

# Women's Policy Group NI

## WPG NI Response to Department of Health's Budget EQIA 2024-25

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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
- Meghan Hoyt - Women's Resource and Development Agency
- Jonna Monaghan, Women's Platform
- Alex Brennan - NI Women's Budget Group
- Aoife Mallon - Ulster University
- Eliza Browning - Committee on the Administration of Justice (CAJ)
- Dara Keeve - Committee on the Administration of Justice (CAJ)
- Siobhán Harding - Women's Support Network
- Nuala Toman - Disability Action
- Sophie Nelson - HereNI

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, the NI Women's Budget Group, and Disability Action.

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

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

- WPG NI COVID-19 Feminist Recovery Plan (2021)<sup>1</sup>
- WPG NI response to Department for Health Budget EqIA 2023-24<sup>2</sup>
- WPG Letter to Secretary of State regarding budget cuts (2023)<sup>3</sup>
- WPG Response to DfE 10X Performance Management Framework (2022)<sup>4</sup>
- WPG Letter to Executive Ministers regarding Welfare Mitigations and Spending Cuts (2021)<sup>5</sup>
- WPG Briefing on Capital Investment and Investment Strategy Northern Ireland (2021)<sup>6</sup>
- Women's Budget Group response to Consultation on draft Programme for Government Outcomes Framework 2021

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

<sup>2</sup> WPG Response to DoH Budget EqIA 2023-24 Available at: <https://wrda.net/wp-content/uploads/2023/06/DoH-Budget-EQIA-23-24.pdf>

<sup>3</sup> WPG Letter to Secretary of State regarding budget cuts (2023) Available at: <https://wrda.net/wp-content/uploads/2023/05/WPG-letter-to-SoS-re-budget-cuts.pdf>

<sup>4</sup> WPG Response to DfE 10X Performance Management Framework (2022) Available at: <https://wrda.net/wp-content/uploads/2022/10/WPG-Response-to-DfE-10X-Performance-Management-Framework.pdf>

<sup>5</sup> WPG Letter to Executive Ministers regarding Welfare Mitigations and Spending Cuts (2021) Available at: <https://wrda.net/wp-content/uploads/2021/08/WPG-Letter-to-Executive-Ministers-Welfare-Reform-Mitigations-August-2021-1.pdf>

<sup>6</sup> WPG Briefing on Capital Investment and Investment Strategy Northern Ireland (2021) Available at: <https://wrda.net/wp-content/uploads/2021/02/WPG-FRP-Briefing-on-ISNI.pdf>

- Women's Budget Group response to Consultation on 2021-2022 Draft Budget

### **3. General Comments on the Department of Health's Budget EQIA Consultation**

While we are engaging with this EQIA out of hope that we may influence in-year monitoring rounds, please do not construe our engagement as endorsement of the Department's process in relation to Section 75 and budget formation this year. We believe that the Department has breached their equality scheme in failing to equality screen and EQIA the draft budget at the earliest stage of policy formation. The timing of the current process is such that many of the decisions in the EQIA have already been taken, breaching the legally binding commitments in the Department's equality scheme.

We raise this point to make it clear that going forward, we expect the Department to equality screen, EQIA and publicly consult on the draft budget - a process that will be coming up shortly. We also expect that the final EQIA will reflect the Department's actions to mitigate adverse impacts in line with ECNI guidance.

#### **3.1 Impact on human rights**

In the context of the draft EqIA, it is essential to note that Northern Ireland is bound by the international human rights obligations of the UK, as State Party to all key human rights conventions, including the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). Progressive realisation of rights is a key principle of the international human rights framework, in recognition that implementation is affected by many factors including resourcing; however, this incorporates a complementary principle that existing rights cannot be rolled back or weakened.<sup>7</sup> This is central in the context of budget cuts, as it is vital to ensure in particular people with protected characteristics are not disadvantaged, and put in place relevant mitigating action. Recommendations to the UK from UN human rights frameworks set out a clear roadmap for this.

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>8</sup> to the report from the follow up to the Inquiry of the Rights of Disabled People under the UN Convention on the Rights of People with Disabilities,

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<sup>7</sup> See [International Covenant on Economic, Social and Cultural Rights](#) for a discussion of both principles

<sup>8</sup> Human Rights Council (January 2023) [Report of the Working Group on the Universal Periodic Review: United Kingdom of Great Britain and Northern Ireland](#)

issued in April 2024<sup>9</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>10</sup> The CEDAW Concluding Observations also urge for action on climate change, and meeting the needs of rural women.

The likely impact of proposed cuts, across Departments, is to reduce realisation of rights set out in CEDAW, in particular in relation to women’s economic independence and safety from violence. This will further widen the gap between Northern Ireland and other devolved administrations in the UK, serving to deepen disadvantage of women and girls in Northern Ireland. Therefore, it is urgent and vital to undertake the fullest possible analysis of how proposed cuts will impact on women and girls, and identify key mitigations wherever possible. Cuts now are likely to create long term negative consequences, with associated public costs, and it is essential that this is clearly understood in decision making, in particular if ‘invest to save’ mechanisms are outside possible options.

### 3.1.2 Section 28 e of the Northern Ireland Act 1998

The Department has a statutory duty to target resources on the basis of objective need under Section 28E of the Northern Ireland Act 1998. Justice Treacy’s High Court judgement<sup>11</sup> concluded that there is a statutory provision to allocate resources on the basis of objective need. Given the disproportionate impact of the proposed decisions on women, children and disabled people who are recognised as most at risk of poverty and deprivation, the proposals in this draft Budget do not meet the statutory requirements of Section 28E.

## 3.2 Gender Budgeting and Equality Responsibilities

Gender budgeting requires government departments to analyse the different impact of the budget on people of different genders, starting as early in the budget cycle as

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<sup>9</sup> UN Committee on the Rights of People with Disabilities (April 2024) [Report on follow-up to the inquiry concerning the United Kingdom of Great Britain and Northern Ireland](#)

<sup>10</sup> CEDAW Committee (March 2019) [Concluding Observations on the 8<sup>th</sup> periodic report of the UK](#)

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<https://www.judiciaryni.uk/files/judiciaryni/decisions/Committee%20on%20the%20Administration%20of%20Justice%20%28CAJ%29%20and%20Brian%20Gormally%E2%80%99s%20Application.pdf>

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>12</sup>. We cannot afford to continue making decisions at the expense of women and risk further degradations to gender equality and additional intersecting equalities as well.

Not only is there an immediate need for gender budgeting in our current crisis, but the benefits would help to improve the budgetary process. Gender budgeting is good budgeting; it encourages greater transparency of government processes, more in-depth assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures will create a firewall to prevent such disproportionate disadvantages in future.

We recognise that the current equality screening and impact assessment duties under Section 75 provide policy infrastructure that could be used to progress gender budgeting. The EQIA process allows space to identify budget impacts on women and opportunities to promote more gender equal outcomes. However, too often the analysis included in these documents focuses only on equal treatment or stops at the point of acknowledging pre-existing inequalities. For gender budgeting to be fully implemented, the next stage must be to reformulate budgets and budgetary policy with targeted measures to improve outcomes for women and girls. Additionally,

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<sup>12</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/](https://www.weforum.org/agenda/2023/01/cost-of-living-crisis-women-gender-gap/)

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>13</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 the budgetary process through gender analysis of data supported by experts from civil society.

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

a. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in section 5 of the EQIA Consultation document? If so, what are they? Please provide details.

There are many adverse impacts that have not been identified in this draft EQIA, and much of this is because of the poor quality of the material that has been used as a basis for the assessments.

##### *i) Use of resources*

Firstly and probably most importantly, the issue begins with the choice of resources that are used to make the assessments of impact. From the point of view of the Women's Policy Group, it is not just disappointing to see that, again, no resources focusing on women's health are listed among the many that have been considered here, it means that the quality of the EQIA itself is compromised.

In the last few months, the Minister has agreed to develop a Women's Health Action Plan, having previously resisted calls from Women's Sector organisations and health experts to develop a Women's Health Strategy. While this change is welcome, it is disheartening and worrying to see that the Department could locate no publications that address issues related to women's health - as opposed to the impacts actually identified, which frame women entirely as providers of healthcare and not as recipients of care. In addition to the Gender Equality Strategy Expert Panel Report, which should be standard as a primer for the issues women face in society overall, and

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<sup>13</sup> OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

which includes an entire chapter on health inequalities<sup>14</sup>, there are multiple reports from women's sector organisations that focus on health inequalities that should be incorporated into the set of resources used for this and every future EQIA.

A number of Women's Sector organisations have produced reports that should be considered. These include:

- Career or care, Women, unpaid caring and employment in Northern Ireland, Women's Regional Consortium & Carers NI, February 2024 [Career or Care \(womensregionalconsortiumni.org.uk\)](https://womensregionalconsortiumni.org.uk)
- Women's experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium & Ulster University, June 2023 [Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf \(womensregionalconsortiumni.org.uk\)](https://womensregionalconsortiumni.org.uk/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf)
- Health Inequalities in Northern Ireland: The Impact of the Cost of Living Crisis on Women's Health, WRDA, February 2024 <https://wrda.net/wp-content/uploads/2024/02/Key-Research-Findings-CoL-Crisis-Health.pdf>

In addition, we are concerned that updated versions of reports are not being used. For example:

- The EQIA refers to the State of Caring Survey 2022, however an updated version for 2023 is available here: [the-impact-of-caring-on-health-in-northern-ireland.pdf \(carersuk.org\)](https://carersuk.org/the-impact-of-caring-on-health-in-northern-ireland.pdf)
- The Life Expectancy in NI report where the EQIA refers to the 2019-21 report but an updated version for 2020-22 is available: [Life Expectancy in Northern Ireland 2020-22 \(health-ni.gov.uk\)](https://health-ni.gov.uk/Life-Expectancy-in-Northern-Ireland-2020-22)
- The Big Parenting Survey where the EQIA refers to the 2021 findings but an updated version for 2023/24 is available: [Big-Parenting-Survey.pdf \(parentingfocus.org\)](https://parentingfocus.org/Big-Parenting-Survey.pdf)

### *Proposed Budgetary decisions*

Overall, in the outlined set of impacts, there are many proposals that will very probably lead to far deeper issues in the future, and decisions that have to be made now due to financial pressures but which are directly as a result of previous poor choices. Throughout this document, there is evident frustration on the part of DoH that they are in a difficult financial position and a tone that suggests that it is wrong to place any financial burdens on this Department, despite the evident fact that every single

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<sup>14</sup> Gender Equality Expert Panel Report. Department for Communities, 2020. Available at: <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>



Department faces a constrained budget at present, and that cuts made to some other Departments' budgets that will directly and irrevocably lead to higher pressure on the Health budget in short order. Despite the insistence of every Department that they are entirely separate to each other, it simply is not true; cuts to programmes run through the Department of Education, for example, will compound lifelong health issues for children and young people. The short-sightedness and use of language that verges on the political is, in this context, very difficult to understand.

### *ii) Uplifting Staff Pay in line with GB and Employment of Agency Staff*

For example, while the Department proposes not uplifting staff pay in line with uplifts provided in GB, no cost-benefit analysis seems to have been made on what the impacts will be if staff leave their posts for posts in GB or elsewhere, and agency staff are drafted in to cover the numbers. We also do not have specific data on the numbers of agency staff covering vacancies at present and the cost of doing this, as opposed to employing and properly paying NHS staff - these numbers are essential for future EqlAs.

### *iii) Capital Funding*

With regard to the capital funding and contractual commitments, it would be welcome and important to clarify what protocols and procedures are in place within the Department and Trusts to ensure new capital builds are kept within timescale and budget, and delivered in a fit for purpose condition. In particular, it would be welcome to clarify what options are in place to claw back costs from contractors are available, where projects are not delivered in a fully finalised way enabling swift clinical commissioning. The history of delays and problems with the new hospitals at the Royal Victoria site is well documented; however, the most recent reports of contaminated water delaying the new maternity hospital even further<sup>15</sup> are highly concerning, as it is unclear how previous incidents have informed practice, protocols and oversight. Considering as one example the lack of budget for pay settlements for HSC staff in 2024-25, it is entirely unclear why contractors would be paid in full or reimbursed for going over budget, particularly when the final result is not fit for purpose, creating costs that are a substantial drain on the budget.

### *iv) Maternal Mental Health and a Mother and Baby Unit*

We are also aware that the Department has been working for some time on a business case for the development of a Mother and Baby Unit for Northern Ireland. This is an unequivocally gendered impact that has not only struggled to see any progress in recent years, but still does not merit mention in this EqlA. It is unclear if this means

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<sup>15</sup> [BBC news Northern Ireland 18 July 2024 'New maternity hospital delayed after bacteria found'](#)

that the plans have been further delayed, given constraints on capital spend, or something else - either way its continued delay is an obvious - and missed - disproportionate impact on women.

*v) Cuts to Domiciliary Care and a Reduction in Care Home beds*

Cuts to domiciliary care packages and a reduction on care home beds will have double impacts on women that have been missed. Firstly, women live longer than men and are therefore more likely to be patients in need of either or both provision at some stage in their lives. Secondly, in the absence of these measures, older people who need support will need to rely on family members to provide that - it is not clear why the EqIA fails to identify the obvious impact this will have on women, who are the vast majority of carers in Northern Ireland and who are already struggling financially<sup>16</sup>.

*vi) Reduction of Vaccination Programmes*

With regards to the reduction of vaccination programmes, it is very difficult to assess the impact of this proposal as we have not been told which vaccination programmes will be reduced; measures such as childhood vaccinations, vaccinations that are particularly targeted to vulnerable people such as pregnant people and those with certain health conditions, or vaccinations that are broadly available to the elderly. Given that uncertainty, we do not know exactly what the impacts will be, but we do know enough to extrapolate at least an impact on those with disabilities and health conditions, older people, younger people and their carers - disproportionately women.

*vii) Waiting List prioritisation*

On the issue of priority areas, we have concerns that the issue of waiting lists is lower down the list of priorities than we would expect. Northern Ireland has been reviewed by the GIRFT team<sup>17</sup> over the length of waiting lists for gynaecology services, a waiting list that has grown faster than any other speciality<sup>18</sup> and which has an obvious gendered impact. In this context, and knowing that Northern Ireland has the longest waiting lists of any area of the UK and that they are getting worse rather than better, inadvertently losing staff does not seem wise. Likewise, cutting the availability of beds will not help, cutting the availability of beds in care homes will likely cause a bottleneck as patients who are too unwell to be discharged home with no care but well enough to be discharged from hospital may have nowhere else to go, and

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<sup>16</sup> Carers UK, 2023, The Impact of Caring on Finances in Northern Ireland. Available at: <https://www.carersuk.org/media/gftldxlp/the-impact-of-caring-on-finances-in-northern-ireland.pdf>

<sup>17</sup> Marie Louise Connolly, BBC News, Waiting Lists: Appalling gynaecology waiting times under review, May 2023 Available at: <https://www.bbc.co.uk/news/uk-northern-ireland-65760246> accessed 27/08

<sup>18</sup> Maria Hassan, The Detail, 2023 [Women Face Bleeding and Incontinence for Years as Gynaecology Waiting Lists Soar](#), accessed 16/08024

slashing enhanced GP services will contribute to longer lists and more acutely unwell people when they do reach hospital services. All of this is interrelated with the levels of support an individual needs in other areas - poor health can (alone, or because the patient develops a chronic or disabling condition as a result of the long wait) lead to increased reliance on the support of charities and the services of the Department for Communities. All of the delays worsen economic activity in the short term and the long term alike.

#### *vii) Cessation of the Core Grant*

The decision to end the Core Grant in 2023 had a significant and ongoing impact on the Community and Voluntary sector which, with a tiny 0.5% of the total Department of Health Funding, provided support to beneficiaries within the areas of addressing domestic violence and abuse, bereavement, looked after children and disability. It is apparent already that this loss has had a devastating impact on the provision of vital services to the most vulnerable.

In addition, Children in Northern Ireland<sup>19</sup> surveyed organisations who were in receipt of the core grant in October 2023 about the impacts and the results are stark:

- Two thirds (68%) of respondents anticipated challenges in sustaining their current level of service due to the reduction in Core Grant funding for 2023/24
- CINI asked respondents to assess the sustainability of their organisations if Core Grant funding ceased in 2024/25 and 62% indicated that they would risk collapsing. They told us there would be loss of experienced staff, reduced services and that some organisations would likely cease to exist.
- Organisations that received Core Grant funding strongly refuted the claim that the impact of ceasing the scheme would be minimal (97% disagreed/strongly disagreed)

The proposal in this budget to partially restore the core grant to 50% of the original total for one year only not only is woefully inefficient to meet the growing need for services, it creates an expectation that 100% of the services can be provided at 50% of the actual cost of delivery. Given that the Community and Voluntary sector has lost staff and infrastructure as a result of last year's cut, and faces a complete cessation in March 2025, this is an impossible and downright offensive proposition.

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<sup>19</sup> CINI, Policy Briefing on Core Grant Funding, 2023 Available at: <https://www.ci-ni.org.uk/wp-content/uploads/Policy-Briefing-Core-Grant-Funding-for-CVS-October-2023.pdf>

**b. Please state what action you think could be taken to reduce or eliminate any adverse impacts in allocation of the Department's draft budget?**

We are gravely concerned that Departments regularly ask us to identify mitigations to their budget proposals. This is not our role within the EQIA process, it is the responsibility of the Department in question. The purpose of EQIAs in general is that the Department is obliged to consider impacts on protected groups. These Section 75 groups are listed in the first place because they are the groups most likely to be adversely impacted by taking an approach that does not include outliers. The purpose is not merely to identify disproportionate impacts but to actively mitigate against them and ideally to seek opportunities to promote equality for these groups.

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

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

ECNI guidance states:

The consideration of mitigating measures and alternative policies is at the heart of the EQIA process...

Ways of delivering policy aims which have a less adverse effect on the relevant equality category, or which better promote equality of opportunity for the relevant equality category, must in particular be considered. Consideration must be given to whether separate implementation strategies are necessary for the policy to be effective for the relevant group. The following must be considered:

- How does each option further or hinder equality of opportunity?

- How does each option reinforce or challenge stereotypes which constitute or influence equality of opportunity?
- What are the consequences for the group concerned and for the public authority of not adopting an option more favourable to equality of opportunity?
- How will the relevant representative groups be advised of the new or changed policy or service?
- If an economic appraisal is necessary – What are the costs of implementing each option? Will the social and economic benefits to the relevant group of implementing the option outweigh the costs to the public authority or other groups?
- Does the public authority have international obligations which would be breached by, or could be furthered by, each of the options?<sup>20</sup>

It is clear that the Department has not adequately complied with ECNI guidance in relation to considering mitigating measures and alternative policies in its EQIA. We expect to see the final EQIA comply with ECNI guidance, otherwise notwithstanding our engagement in this process we may pursue a complaint against the Department for breaching the terms of their equality scheme.

**c. Are there any other comments you would like to make in regard to this EQIA or the consultation process generally?**

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

Adding to the challenges in responding to this consultation is a very brief and vague Rural Needs Impact Assessment (RNIA), a more considered version of which would provide a richer picture of the potential impacts of this budget. Alongside an intersectional approach, a RNIA should 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

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<sup>20</sup>[https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance\(2005\).pdf](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance(2005).pdf) (page 30)

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.

We are aware that the Department for Health is, in many ways, one the most pivotal of all Departments in Northern Ireland and accordingly it has the largest budget allocation. With that in mind, it is vital that the Department commit to protecting the most badly impacted by its choices, even in the difficult times that we currently face.

## **5. Additional Comments**

To conclude, the Women's Policy Group is again gravely concerned at the approach the Department has taken to identifying and mitigating inequalities that will arise as a result of its budgetary decisions, and at the nature of the cuts that are proposed. As well as failing entirely to promote opportunities to achieve equality, the approach to the entire budgeting process fails to understand inequality and does not meet the guidelines set out by the Equality Commission.

*ENDS*

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

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