



**NI
WOMEN'S
BUDGET
GROUP**

**NORTHERN IRELAND WOMEN'S BUDGET GROUP (NIWBG)
RESPONSE TO THE DEPARTMENT OF EDUCATION BUDGET
2024/25 – EQUALITY IMPACT ASSESSMENT**

Department of Education

Prepared by Alexandra Brennan (Coordinator) of NIWBG

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The Northern Ireland Women's Budget Group (NIWBG) is made up of organisations and individuals from the women's sector, trade union movement, academia and wider civil society in Northern Ireland, with the aim of implementing a gender equal economy. The members of the NIWBG scrutinise policy and budgetary matters with a gendered lens to bring attention to the different ways in which women and men are affected by government-level decision-making. It aims to provide policy- and budget-makers with policy analysis to secure substantive equality for women and men through the assessment of gender impact.

The NIWBG works with a range of organisations in Northern Ireland on devolved issues and with sister organisations in Wales, Scotland, England and Ireland on East-West and North-South issues.

We hope that our response to the consultation will be considered by the Department of Education.

If there are any questions or comments regarding the NIWBG's response, please direct them to the Coordinator for the NIWBG, Alexandra Brennan (info@niwbq.org).

Introduction

We welcome the opportunity to respond to this consultation, and we are willing to engage with the Department further on the matters raised in this document following submission. In our response, we provide our general comments on the Draft EQIA:

- The timing of the consultation publication
- Data analysis
- Lack of data

We highlight guidance from the Equality Commission in regard to the responsibility of the Department to mitigate impacts. The NIWBG would also like to bring gender budgeting to the attention of the Department as a set of tools that can help improve equality analysis, sustainability of finances, and transparency.

We would like to endorse the response of the Women's Policy Group, to which we contributed.

General Comments

While we welcome the publication of EQIAs where EQIAs are necessary, it is disappointing that the Department has put out this consultation on an EQIA that is tied to a budget that is ending in two and a half months. It is unclear what the point of this exercise is for the Department, as the Equality Commission states that consultations should be '*timely*'¹. We would argue that the publication of this consultation is anything but, and we encourage the Department to proactively assess the potential equality impacts for the 25-26 Budget as there is better opportunity to mitigate inequality and/or promote equality in a policy that is yet to be implemented.

Within the actual EQIA, there is a lack of analysis of data for each protected equality group. In the document, the majority of data used is census data which helps in constructing a starting-point for data analysis. However, this was rarely followed by data from sources that would help identify impacts and/or opportunities and did not include any analysis of how, given the data, that group will be impacted or how there is an opportunity to improve equality outcomes. This is the very foundation of an equality impact assessment, yet this fundamental work to determine whether change to the policy is needed is absent from the document. For example, under the characteristic 'Marital Status,' the Department listed the number and gender of people between the ages of 16-19 who are married. However, data shows that lone parent households (93% of which are headed by women²) are more at risk of being in poverty³. Therefore, children's education will be differentially impacted by marital

¹ Equality Commission for Northern Ireland. *What is an EQIA?*

(<https://www.equalityni.org/EQIA#:~:text=What%20is%20an%20Equality%20Impact,of%20opportunity%20and%20good%20relations.>)

² Women's Regional Consortium (2024). *Women, Skills, and Barriers to Work.*

(<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/12/Women-Skills-Barriers-to-Work-1.pdf>)

³ Northern Ireland Audit Office. *Child Poverty in Northern Ireland.* (<https://www.niauditoffice.gov.uk/publications/html-document/child-poverty-northern-ireland>)

status, even though that protected characteristic indirectly affects them. Below, we refer to guidance from the Equality Commission (ECNI) that outlines how to approach mitigating impacts and/or capitalising on opportunities for equality improvement. We feel that it is important that the guidance is reiterated for DE in this response, but even that work cannot even be done without analysis.

Additionally, lack of or no data does not mean there is no impact, as the Department stated repeatedly throughout the assessment. We would encourage the Department to expand the list of data resources that are used to ensure that all avenues of data collection for equality analysis are exhausted. Where there are genuine data gaps, the Department should conclude that impacts are potential and therefore further analysis/mitigation is required.

Mitigating Impact

We direct the Department to guidance from the Equality Commission⁴ on “Consideration of measures which might mitigate any adverse impact; and alternative policies which might better achieve the promotion of equality of opportunity”:

The consideration of mitigating measures and alternative policies is at the heart of the EQIA process. Different options must be developed which reflect different ways of delivering the policy aims. The consideration of mitigation of adverse impacts is intertwined with the consideration of alternative policies. Mitigation can take the form of lessening the severity of the adverse impact. Annex 1, para. 4.1.

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? Annex 1, para. 4.2*

⁴Equality Commission for Northern Ireland. (2005). *Section 75 of the Northern Ireland Act 1998: Practical Guidance on Equality Impact Assessment*. ([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))

Clear evidence of the consideration of the impacts of alternatives must be apparent in the relevant consultation documentation. Annex 1, para. 4.3

We encourage the Department to incorporate this guidance within their analysis and development processes of all potential budgets and policies that require mitigation as these considerations appear to be absent from the Department's Draft EQIA.

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 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 crisis⁵. We cannot afford to continue making decisions at the expense of women and risk further degradations to gender equality and additional intersecting equalities as well.

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

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

⁵ 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/>)

finalised. The OECD⁶ 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.

Please see **Annex 1** for more on gender budgeting.

Conclusion

To conclude, we would like to reiterate the importance of aligning the equality assessment process with key stages of the development of a policy, quality analysis, use of diverse data sources, and awareness of hidden impacts. We also encourage the Department to revisit the guidance from the Equality Commission on mitigating adverse impact as it is key during financially constrained periods. Gender budgeting is an additional set of tools that can help the Department prioritise spend where need is greatest, and we would welcome a discussion with the Department on gender budgeting and our wider response.

⁶ OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, (<https://doi.org/10.1787/9574ed6f-en>).

ANNEX 1



BRIEF ON GENDER BUDGETING

Budgetary processes and spend are far from 'neutral' – policies emanating from the Programme for Government and budgetary decisions have gendered consequences, whether they be intended or not. By taking a 'gender neutral' stance, decision-makers are oblivious to the complexities between the experiences of women and men and reinforce systemic disadvantages faced by women and other groups.

What is Gender Budgeting?

Gender budgeting is the tool that can help recognise systemic disadvantages and lead to budgets and policies that promote greater gender equality. If implemented, policy makers would consider the gendered impacts of spending and revenue raising decisions and how to use these mechanisms to bring about gender equality. Women's intersecting identities are also included in this analysis and policy makers are expected to promote these areas of equality as well.

In [Gender budgeting: Working paper 1](#), our partners Dr. Joan Ballantine, Dr. Michelle Rouse and Professor Ann Marie Gray highlight that, "*Northern Ireland lags significantly behind other devolved UK administrations and other OECD countries,*" where gender budgeting has "*made a significant contribution to addressing gender inequalities, the elimination of unequal outcomes and to increasing women's participation in civic and political life.*"⁷

It is important to note that gender budgeting is not about allocating more funds to women but about making sure the available resources have maximum impact. The [European Women's Lobby](#) breaks down the realities and misconceptions about gender budgeting as follows⁸:

Gender budgeting is about:

- *Including a gender perspective into budget planning and analysing budgets taking into account their impact on women and men, girls and boys.*
- *Introducing a gender perspective into the entire budget, including seemingly "gender-neutral" budget lines.*
- *Reprioritising and refocusing of spending and restructuring of taxation with a view to promote equality.*

Gender budgeting is not about:

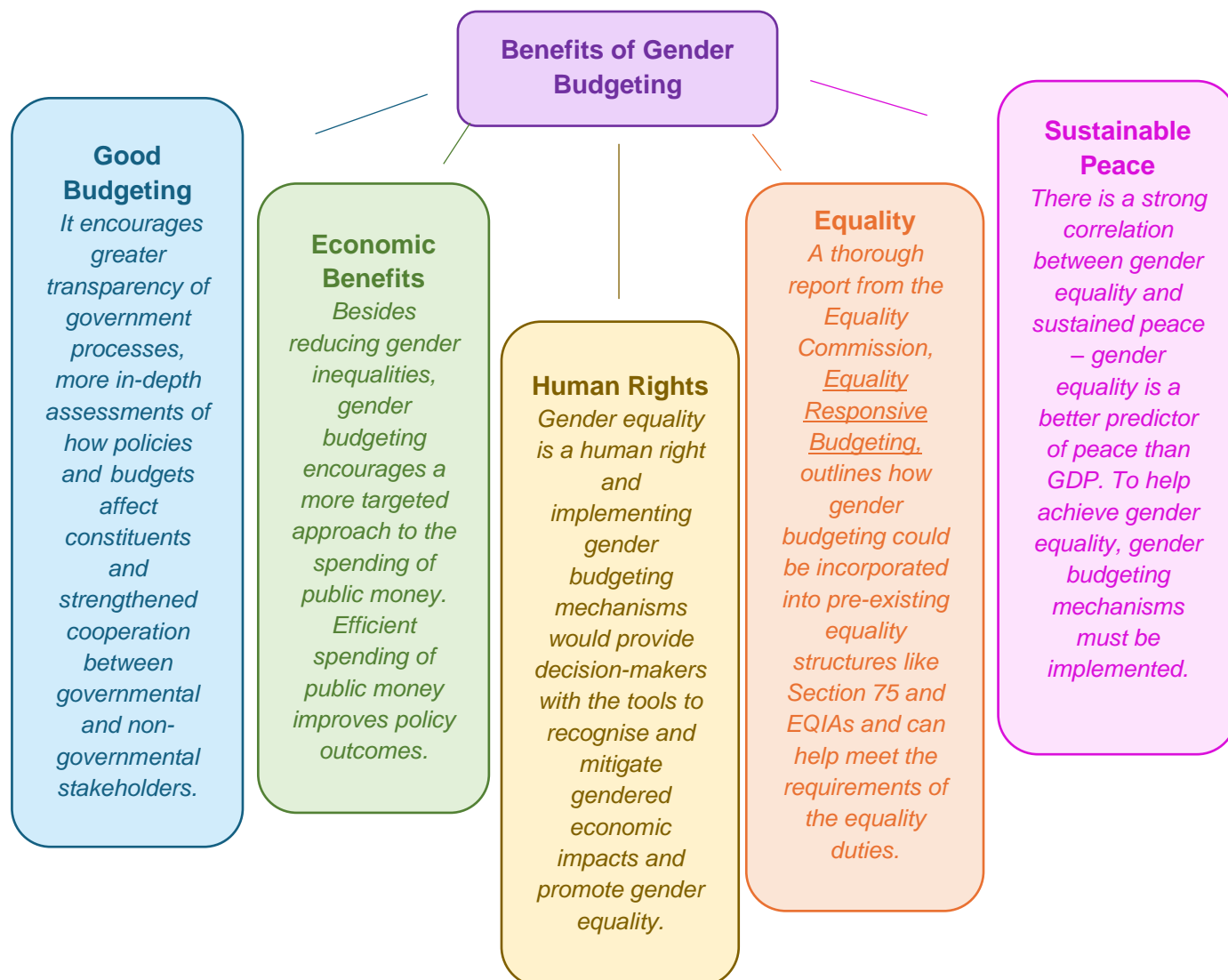
- *Creating separate budgets for women.*
- *Only looking at the parts of the budget which have a social content or that are explicitly gender-related.*
- *Demanding more spending.*

⁷ Ballantine, J., Rouse, M. and Gray, A.M. (2021). *Gender Budgeting: Working Paper 1: What does the literature tell us? Lessons for Northern Ireland (NI)*. ([Gender Budgeting-1.pdf](#))

⁸ European Women's Lobby. *What is Gender Budgeting?* ([What Is Gender Budgeting.pdf](#))

Why implement Gender Budgeting?

Gender budgeting is transformative, enhances transparency and accountability, and is of value in delivering economic benefits⁹, rights and equality¹⁰, and securing sustainable peace¹¹.



⁹ Himmelweit, S. (2002). 'Making visible the hidden economy: the case for gender-impact analysis of economic policy,' *Feminist Economics*. 8 (1), 49-70.

¹⁰ Quinn, S. (2013). *Equality responsive budgeting*. ([Equality Responsive Budgeting \(equalityni.org\)](https://equalityni.org/))

¹¹ Fernanda Espinosa, M. (2020). *Peace Is Synonymous With Women's Rights*. (<https://www.un.org/en/un-chronicle/peace-synonymous-women%E2%80%99s-rights>)