



NORTHERN IRELAND WOMEN'S BUDGET GROUP (NIWBG) RESPONSE TO THE DRAFT BUDGET 2026-29/30 EQIA CONSULTATION

Department of Health (DoH)

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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 will be considered by the Department when finalising the Draft Budget 2026-29/30 EQIA.

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

General Comments

We welcome the opportunity to respond to this consultation as the spending decisions taken by this Department are key to tackling gendered health inequalities, such as dedicating spend to a new Maternity Hospital. In comparison to the previous DoH Budget EQIA (25-26), there are significant improvements in this EQIA such as the widened scope of data used and the section on mitigating impact. In the absence of an agreed budget, this assessment is an opportunity to demonstrate the thought-process behind departmental decision-making and outline mitigations that the Department will put in place or is considering putting in place. We feel that this could have been fleshed out more by the Department. In this response, we highlight some improvements the Department can make to the current EQIA and can embed in practice for future EQIAs. We would also like to endorse the responses of the Women's Regional Consortium and the Women's Policy Group, of which we contributed to.

One of the main concerns with this EQIA is that this is an assessment of a budget that has not been agreed by the Executive as of yet and therefore can be subject to change. If/when the Budget is agreed, we urge the Department to revisit this assessment and ensure that the observations and actions within this document align with the finalised Budget.

We acknowledge that, over the years, the Department has widened the scope of data used to inform the EQIA, which is a very welcome change. We encourage the Department to go further and incorporate more academic and community-led research as often it is qualitative, community-led research that reaches groups or captures experiences that are absent from government data sources. Some research that could have been used:

- [Women's Regional Consortium, Women's Experiences of the Cost of Living Crisis in Northern Ireland \(2023\)](#)
- [WPG NI Covid-19 Feminist Recovery Plan \(2021\)](#)
- [WRDA, Health Inequalities Research: The Impact of the Maternal Advocacy & Support Project \(2023\)](#)

- [WRDA, Health Inequalities Research: the Impact of the Cost of Living Crisis on Women's Health \(2024\)](#)
- [WRDA, Health Inequalities Research: A Women's Health Strategy for Northern Ireland \(2025\)](#)
- [Women's Regional Consortium, Mental Health Matters for Women \(2026\)](#)

Compared to the previous year's EQIA, the analysis of individual protected characteristics has improved, but there still seems to be a lack of intersectional analysis across different characteristics, leading to potential negative impacts going missed. By including an intersectional lens to EQIAs, additional impacts come to light that could help inform decision-making and protect the most vulnerable from the worst impacts. By isolating protected characteristics into columns, each group becomes a silo. This does not take into account the make-up of most people as many identities are an amalgamation of protected characteristics. Therefore, introducing a more prominent intersectional lens to the equality analysis process would only strengthen the impact of the Department's allocated spend.

Revenue Raising

In the face of fiscal constraints, there have been many conversations around revenue raising options. The NIWBG has responded to a number of consultations in relation to revenue raising proposals from Executive Departments, and often times there is no gendered analysis of these proposals. Our considerations towards particular revenue raising measures have not changed - revenue raising measures like charging for domiciliary care packages will not raise enough to cover the funds needed to deliver good public services. Additionally, projected revenue raised from charges 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 revenue raising measures will also not be a cost-free policy decision and will have a particular gendered impact as women dominate in both paid and unpaid caring roles.

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-termist approach to the current fiscal issues within the Department. It will not solve the crisis, but it will cause further economic burden on those struggling the most.

Mitigating Impact

In the consultation, the Department identifies a number of significant potential impacts on Section 75 groups, as well as society as a whole. However, the Department does not provide any potential mitigations for these impacts.

We direct the Department to guidance from the Equality Commission¹ 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?*

¹Equality 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))

- *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*

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 the EQIA. Considering the scope and potential impacts of the Budget, analysis and mitigation of impact must be thorough and clear.

Gender Budgeting

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 crisis². 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.

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 places at the very end of the budget planning process or after the budget has been finalised. The OECD³ 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

² 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/>)

³ OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, (<https://doi.org/10.1787/9574ed6f-en>).

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.

A gender budget statement is just one of a suite of tools that can be employed with the implementation of gender budgeting. Published alongside the annual budget, the statement is an opportunity for the Department to highlight where resources were allocated to promote gender and wider equality, as well as note equality gaps and address impacts. Using gender as the foundation for this equality analysis is key, as it helps to facilitate an intersectional approach to analysis as opposed to viewing each equality ground in a silo. In Victoria, a state in southeastern Australia, an annual [*Gender Equality Budget Statement*](#) is published alongside the budget. They provide an overall snapshot of how they allocated spend to promote gender equality, and then breakdown the spend – giving the context of the issue, what they are spending, and why they are spending the funds in that way. In the 2024-25 Statement⁴, the following was highlighted:

- More than 130 Budget initiatives were assessed as having a positive impact on gender equality. Nine initiatives were identified as having a significantly positive impact, with a total investment of \$352 million.
- \$657 million for services including addressing the ‘pain gap’ in women’s health.
- \$1.8 billion to increase women’s economic security by supporting workers in women-dominated sectors and helping women to reskill and retrain.
- \$292 million to assist with cost of living pressures that disproportionately affect women.
- \$216 million to support Victorians experiencing homelessness into housing, including women.
- \$269 million to prevent family violence and support women’s safety.

Acknowledging the issues at hand and demonstrating how resources will be used to mitigate/eradicate inequalities is not only useful for the Department, it also brings

⁴ Victoria State Government (2024). *Helping Families: Gender Equality Budget Statement*. (<https://s3.ap-southeast-2.amazonaws.com/budgetfiles202425.budget.vic.gov.au/2024-25+State+Budget+-+Gender+Equality+Budget+Statement.pdf>).

greater transparency to the budgeting process, with clearer links to where public money goes and the positive impact it can have on society.

Conclusion

We encourage the Department to take on the recommendations of this response and responses from organisations like the Women's Policy Group and the Women's Regional Consortium. It is crucial that the Department allocates spend with the protection of equality characteristics in mind, and the EQIA is the best tool we have to help determine how best to achieve that. Again, we hope our response is considered by the Department and we would welcome the opportunity to meet with the Department to further discuss our response.