



NORTHERN IRELAND WOMEN'S BUDGET GROUP (NIWBG) RESPONSE TO THE DEPARTMENT FOR COMMUNITIES BUDGET 25-26 ALLOCATIONS

Department for Communities (DfC)

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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 2025-26 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 inequalities. Unfortunately, we found that the EQIA does not provide a proper assessment of the possible equality impacts, whether they be positive or negative. This assessment is an opportunity to demonstrate the thought-process behind departmental decision-making and plan for how the Department addresses impacts on protected equality characteristics. We believe that the use of data sources and the analysis should have been much more rigorous to ensure that all possible impacts and mitigations have been identified. In this response, we highlight some improvements the Department can make to the current EQIA and can embed in practice for future EQIAs.

There is no diversity amongst the data sources used to complete this assessment, and the Department did not even use Department-commissioned sources such as the Discretionary Support Review, the Mitigations Review, or any of the Expert Panel Reports. The gaps left due to the absence of departmental and non-departmental data sources are evident from the assessment provided. Additionally, lack of or no data does not mean there is no impact and 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.

One of the main issues with the EQIA is the lack of analysis for each equality group. As mentioned previously, the Department desperately needs to improve the data that is used to perform EQIAs. Despite this, when the available data is applied to the specific protected characteristics, there is minimal analysis provided and there are minimal connections made between this analysis and the impacts of potential decisions taken by the department. For example, the Department states that there will be no gendered impact from the slight increase in funding for the Community and Voluntary Sector (CVS) despite citing previously that women make up the majority of the CVS workforce and recognising that the sector is under pressure. The Department should be plainly connecting spend and other potential decisions to the data that is collected and compiled underneath the Section 75 categories. It is important to note that this is also an opportunity for the Department to highlight positive impacts.

The EQIA also lacked thorough intersectional analysis. 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 assessing protected characteristics individually, 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.

Often, the Department concludes that because money is being spent on said policy, that the impact will be either positive or neutral. However, the Department has not actually demonstrated how they came to this conclusion through data and their analysis as mentioned previously. Therefore, it is impossible for the Department, the NIWBG, or any other consultees to be confident that there will not be negative impacts on gender or any other Section 75 group. While we understand that it is impossible to predict every possible impact, EQIAs are an opportunity for the Department to justify decisions that have been taken and therefore proper data usage and analysis is crucial. The application of these recommendations when conducting an equality assessment could massively improve the Department's understanding of how potential policy and spending decisions will impact on protected groups.

Mitigating Impact

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?*
- *How does each option reinforce or challenge stereotypes which constitute or influence 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))

- *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.

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/>)

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 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

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

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, but it also brings 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. 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.

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>).