



**NI
WOMEN'S
BUDGET
GROUP**

**NORTHERN IRELAND WOMEN'S BUDGET GROUP (NIWBG) RESPONSE
TO THE CONSULTATION ON TEO'S DRAFT PROGRAMME FOR
GOVERNMENT 2024-2027 DRAFT EQUALITY IMPACT ASSESSMENT –
(EQIA)**

The Executive Office

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 for Infrastructure.

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).

Introduction

We welcome the opportunity to respond to the Programme for Government (PfG) Equality Impact Assessment (EQIA), and we are available to further discuss the contents of our response with TEO. It is crucial that, alongside a strong PfG, we have a strong equality assessment. This EQIA is not the strong assessment that it needs to be, but we believe that suggestions made below and from the wider equality sector can help in fortifying this document. We have also included guidance from the Equality Commission around mitigating potential adverse impacts as this step is essential for a policy of this size. Lastly, we have provided information on how gender budgeting tools can help in reinforce the equality assessment process.

We endorse the response of the Women's Regional Consortium and Women's Policy Group, the latter of which we have contributed to.

General Comments

There has not been a completed PfG nor any accompanying EQIAs/needs assessments since the 2011-2016 mandate. While we are hopeful that we will have another PfG for the remainder of the current mandate, we do not feel positive about the content of the document nor the accompanying equality assessment. We have already provided our scrutiny of the policy itself but we feel it is crucial that the Department not only amends the EQIA based off of responses to this consultation, but also continues to revisit and revise the assessment throughout the implementation and monitoring of the PfG.

A major aspect of the document that must be revisited and revised is the lack of analysis of data for each protected equality group. In the document, data is listed next to each group without 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. 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 TEO in this response, but even that work cannot even be done without analysis. Additionally, TEO only utilised data from NISRA. If there was an issue with analysing for potential impacts/improvements due to lack of data, there were other data sources TEO could have used that have been commissioned by other departments and/or produced by academic institutions and civil society organisations.

Besides issues around minimal analysis of policy impacts, any analysis and/or data collection specific to Section 75 groups was siloed into categories. This leaves little room for an intersectional approach to equality analysis, which is key for a policy of this size. We understand that the questions asked in EQIAs does not necessarily facilitate an intersectional policy analysis. However, we encourage TEO to revisit the assessment and look for opportunities to incorporate an intersectional lens to this EQIA.

The grid on page 55 summarising impacts on equality of opportunity and good relations would have been a useful tool if there was explanation as to why certain protected groups were or were

not under priorities/missions. For example, why does ‘Safer Communities’ only impact on age and men & women Generally? Or why would sexual orientation not be impacted under the ‘People’ mission, and likewise disability under ‘Peace’?

Ultimately, we believe that any EQIA is only as strong as the policy it is assessing. As we mentioned in our response to the PfG, there were significant issues around clarity of actions, timelines, and responsibilities. Therefore, it is to be expected that the assessment of a vague policy will be vague itself. We encourage TEO, while amending the actual PfG document, to revisit the EQIA as it is crucial to the success of the PfG outcomes.

Mitigation Responsibilities of the Department

In the consultation, TEO identifies impacts to Section 75 groups, as well as society as a whole. We note however that there was little to no mitigation for impacts with potentially very critical outcomes. We would like to direct TEO 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?*
- *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?*

¹ Equality Commission (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))

- *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 TEO 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 TEO'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. Intersectional 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.

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.

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/>

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 equality groups 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 gender equality outcomes. 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 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.

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

Conclusion

We hope that our comments and recommendations are considered by TEO. The NIWBG would like to reiterate that we are available for a meeting to further discuss the contents of our response.

³ 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.*"⁴

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 follows⁵:

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:

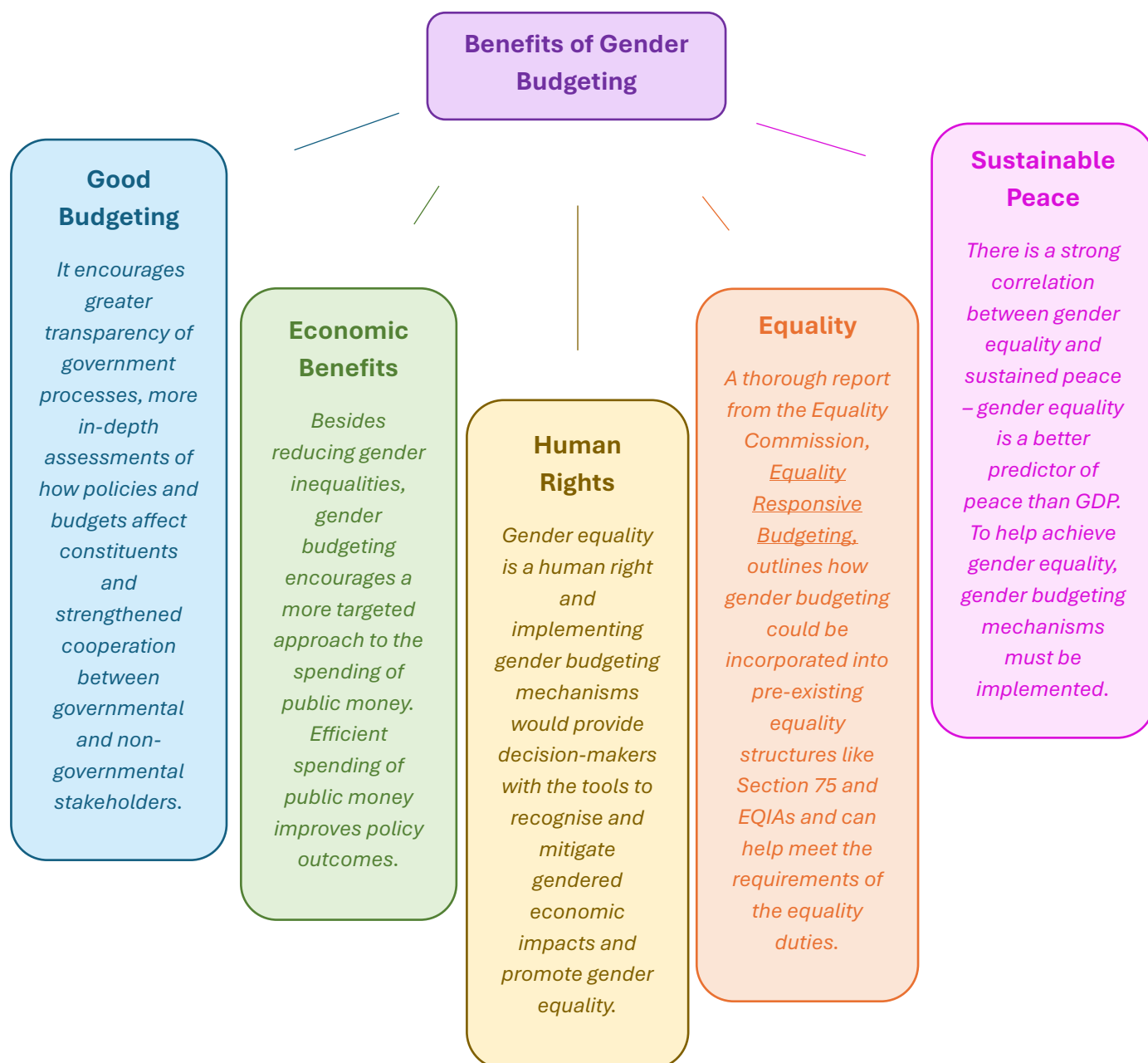
- Creating separate budgets for women.
- Only looking at the parts of the budget which have a social content or that are explicitly gender-related.
- Demanding more spending.

⁴ 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](#))

⁵ 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 benefits⁶, rights and equality⁷, and securing sustainable peace⁸.



⁶ Himmelweit, S. (2002). 'Making visible the hidden economy: the case for gender-impact analysis of economic policy,' *Feminist Economics*. 8 (1), 49-70.

⁷ Quinn, S. (2013). *Equality responsive budgeting*. ([Equality Responsive Budgeting \(equalityni.org\)](https://equalityni.org/))

⁸ 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>)