



NORTHERN IRELAND WOMEN'S BUDGET GROUP (NIWBG) RESPONSE TO THE DRAFT BUDGET 2025-26 EQIA CONSULTATION

Department of Health (DoH)

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 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 health inequalities, such as dedicating spend to a new Maternity Hospital. In comparison to the previous DoH Budget EQIA (24-25), there are significant improvements in this EQIA such as the widened scope of data used and the section on mitigating impact. However, there is no doubt that the Department, as well as the whole of the Executive, is faced with a dire financial situation that is going to impact on the delivery of key services and new projects. While this is outlined in the EQIA, the 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 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.

One of the main issues with the EQIA is the lack of analysis for each equality group. As mentioned previously, the Department made a clear effort to expand the amount of data that is used to inform the assessment of potential equality impacts. However, when the data is applied to the specific protected characteristics under Section 5.1, there is a bit of analysis provided but it is very loosely connected to general impacts. The Department should be plainly connecting spend and other potential decisions to the data that is collected and compiled underneath the Section 75 categories. For example, the Department acknowledges that, “Lack of investment in social care means that levels of unmet need are increasing, leading to greater reliance on unpaid carers and a further diminishing of choice about whether to care,”¹ under the title *Gender (men and women generally)*. Despite this, the Department listed *Restriction of domiciliary care packages* as a possible saving measure and under the possible impacts of this, did not cite the evidence provided in section 5.1. It is important to note that this is also an opportunity for the Department to highlight positive impacts, such as the positive impact that the creation of a new Maternity Hospital will have on women.

We would also like to highlight the lack of clarity around how the Department determined the categorisation of impacts on protected characteristics. The Department utilises a number of charts to categorise which Section 75 groups will be impacted by specific lines of spend. While this may be used to bring accessibility and organisation to the document, there is no explanation for why certain groups *will not* be impacted by the identified spend. Therefore, there seems to be an awareness gap around the impact of these issues on groups that were assigned ‘no impact’. For example, the potential saving measure *Reduction of Acute Hospital Beds/Services* is not listed as having a

¹ DoH, (2025). *Draft Budget 2025-26 Equality Impact Assessment*. (<https://www.health-ni.gov.uk/sites/default/files/2025-01/doh-consultation-draft-budget-25-26-equality-impact-assessment.pdf>)

gendered impact despite acknowledging in the paragraph above it that those working in health and social care will be impacted and in the paragraph before that outlining that 80% of those working in the health and social care sector are women. Similarly, *Adult Social Care Reform* in the next chart is listed as having no gendered impact, despite references to the gendered nature of unpaid care and the care sector in section 5.1. If the data is not available to determine what the impact will be, it is incorrect to assume that there will be no impact. Rather, this should be identified as a data gap and that there is potential for that group to be impacted. Including these aspects in the EQIA would not only bring clarity to the decisions made by the Department but would also act as a protective measure for the Department as it can demonstrate that all possibilities were explored before making an evidence-based decision.

The chart format used in the EQIA also inhibits intersectional analysis, which is minimally featured in the document. 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.

Care & Economic Inactivity

One of the key issues identified in the draft Budget 2025-26 was the labour market. Currently, we face the problem of the lowest unemployment rate of the 12 UK regions paired with the fourth lowest employment rate² and the highest economic inactivity rate at 28.5%³. This issue was referenced a number of times at the outset of the consultation, setting the context for further problems around productivity, economic prosperity, and how this impacts on the wider financial situation in Northern Ireland.

The Department acknowledged that the increasing level of long-term sickness amongst 16-64 year-olds contributes to higher rates of economic inactivity. However, the Department failed to acknowledge the role that unpaid caring plays in keeping people, particularly women, out of work. While long-term sickness was the most popular reason women gave for being economically inactive, one in four (25%) of women said that

² DoF (2025). *2025-26 Draft Budget*. (<https://www.finance-ni.gov.uk/sites/default/files/2025-02/Draft%20Budget%202025-26%20Document.pdf>).

³ ONS (2024). *Labour market in the regions of the UK: October 2024*. ([https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/regionallabourmarket/october2024#:~:text=In%20June%20to%20August%202024,Ireland%20\(28.5%25\)%20and%20the](https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/regionallabourmarket/october2024#:~:text=In%20June%20to%20August%202024,Ireland%20(28.5%25)%20and%20the)).

family/home responsibilities was the reason for their economic inactivity – family/home responsibilities was the least common reason given by men⁴.

The gendered nature of unpaid care is clear and it is facilitated by unaffordable, inaccessible childcare and crises within the social care system. Providing unpaid care for sick or disabled adults typically falls on women – women are more likely to be an unpaid carer 11 years before men⁵. Research from CarersNI shows that unpaid carers save the government £5.8 billion in care costs every year⁶, yet 75% of carers in employment said they are struggling to juggle paid work and care⁷. Furthermore, 27% of carers said they had to reduce their hours, 14% said they had to take on lower paid and/or more junior roles to balance care, and 29% said they had to leave work altogether⁸. The economic contribution of unpaid carers is immense, yet the undervaluing of this contribution and the lack of action to improve work-care-life balance for unpaid carers directly adds to Northern Ireland's high rate of economic inactivity. The crisis in adult social care is predicted to get worse. At the moment, one in six people in Northern Ireland are over the age of 65 – this is meant to increase to one in five by 2030 and to one in four by 2040⁹. The NHS is already under an extreme amount of pressure and relies on unpaid carers as the system alone could not manage the amount of people that require care. An imbalance of those who need care to those who provide care would add significant pressures to the health system, creating a dangerous environment for those working in and using the health and social care system.

Social care workers are predominantly women, and the sector is low-paid and precarious. The crises in both social care and childcare, which will likely get worse with inaction, massively contributes to high economic inactivity and low employment despite low unemployment. Therefore, it is greatly disappointing that this was not recognised by the Department as a funding priority. In fact, there were proposals, such as the reduction of domiciliary care packages, that are likely to worsen not only the situation in the care system, but also hospital beds, the length of waiting lists, economic inactivity rates, etc.

The issue of adult social care is not the responsibility of the Department alone, as we must see investment in the apprenticeships, training, and support for those working in or who want to work in care. We call on the Department to work across the Executive to

⁴ NISRA (2024). *Women in Northern Ireland 2023*. (<https://datavis.nisra.gov.uk/economy-and-labour-market/women-in-northern-ireland-2023.html>).

⁵ Women's Regional Consortium & CarersNI (2024). *Women, unpaid caring and employment in Northern Ireland*. (*Career or Care*).

⁶ Carers UK (2023). *The economic value of unpaid care in Northern Ireland*. (<https://www.carersuk.org/reports/the-economic-value-of-unpaid-care-in-northern-ireland/#:~:text=People%20providing%20unpaid%20care%20for,%C2%A30.7%20million%20per%20hour>).

⁷ Carers NI (2025). *State of Caring 2024: The impact of caring on finances and employment*. (<https://www.carersuk.org/media/fr5fixqo/state-of-caring-ni-2024-finances-employment.pdf>).

⁸ Ibid.

⁹ COPNI (2024). *The Commissioner for Older People and Age NI call for Northern Ireland's ageing population to be prioritised in Programme for Government*. (<https://copni.org/news/articles/the-commissioner-for-older-people-and-age-ni-call-for-northern-irelands-ageing-population-to-be-prioritised-in-programme-for-government#:~:text=One%20in%20six%20people%20in,one%20in%20four%20by%202040>).

manage the crisis in the care system. The NIWBG recommends that career pathways and pay progression are put in place for low-paid, precarious work like care, and that funding is increased for apprenticeships that are considered highly skilled yet require low-level qualifications, such as social care apprenticeships.

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. We note that the Department included a section on *Mitigating Actions*, which is a positive improvement from Budget 24-25's EQIA. However, the content in that section is focused more on cost saving as opposed to addressing the impacts identified earlier in the consultation.

We direct the Department to guidance from the Equality Commission¹⁰ 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?*

¹⁰Equality 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))

- *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 crisis¹¹. 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

¹¹ 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/>)

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 OECD¹² 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 spending the funds in that way. In the 2024-25 Statement¹³, 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.

¹² OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, (<https://doi.org/10.1787/9574ed6f-en>).

¹³ 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>).

- \$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 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.