



**NI
WOMEN'S
BUDGET
GROUP**

**NORTHERN IRELAND WOMEN'S BUDGET GROUP (NIWBG) RESPONSE
TO THE CONSULTATION ON THE NI EXECUTIVE ANTI-POVERTY
STRATEGY**

Department for Communities

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 Communities.

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

The NIWBG firmly believes that the Anti-Poverty Strategy (the Strategy) produced by the Department is not fit for purpose. It does not adequately address the gendered nature of poverty nor the ways in which compounding inequalities can lead to poorer economic outcomes for people. There are minimal cross-strategic and cross-departmental linkages within the Strategy, despite the fact that poverty is not limited to a single department's remit. Basic strategic structures are also absent from the Strategy, which puts into question the ability of the Department to implement and deliver the Strategy. The experts within the Anti-Poverty Strategy Group, with the support of wider civil society, have developed a clear strategic vision, outcomes, and other recommendations to aid the Department in developing and delivering a strategy that will make a tangible difference in the lives of people experiencing poverty. We fully endorse the responses of the Anti-Poverty Strategy Group, as well as NIAPN, the Women's Regional Consortium, and the Women's Policy Group.

The Gendered Nature of Poverty

Women are disproportionately impacted by poverty - therefore it is crucial that the Strategy has a gendered lens. If the approach to dealing with the crisis of poverty gender-neutral, this not only prevents further gains towards achieving gender equality but erodes progress that has already been made around attaining equality.

Women face disproportionate challenges that require gender-sensitive responses. Households with children will be disproportionately impacted; the combination of budget cuts and the cost-of-living crisis has led to an increase in both relative and absolute child poverty in Northern Ireland (22-23)¹. Children's poverty is women's poverty; before children go without food, heat, new clothing, etc., women bear the brunt of these impacts for as long as they can before they cannot help it from impacting on their children². Women are more likely to take on childcare responsibilities³ and are more likely to be lone parents (93%)⁴, and lone parents are particularly vulnerable to impacts from the cost-of-living increases due to living off of and taking care of children on a single income. Women are more likely to rely on benefits, be in low-paid and precarious work, earn below the living wage than men, and are more likely to be 'economically inactive,' with Northern Ireland having the highest rate of economic

¹ Public Accounts Committee (2024). *Public Accounts Committee – Report on Child Poverty in Northern Ireland*.

(<https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/public-accounts/reports/report-on-child-poverty-in-northern-ireland/>)

² Women's Policy Group (WPG) (2021). *NI COVID-19 Feminist Recovery Plan: Relaunch – One Year On* ([WPG-COVID-19-Feminist-Recovery-Plan-Relaunch-One-Year-On.pdf \(wrda.net\)](https://www.wrda.net/blog/women-will-be-most-impacted-by-new-domestic-rating-measures))

³ Ibid.

⁴ WRDA (2025). *Women will be most impacted by new domestic rating measures* (<https://www.wrda.net/blog/women-will-be-most-impacted-by-new-domestic-rating-measures>)

inactivity across the UK. Women's economic outcomes are significantly worse than men's, demonstrating why anti-poverty work must be approached from a gendered lens.

These impacts can be worse at the intersection of other identities. For example, women with disabilities will be acutely impacted by poverty, particularly if they rely on machinery in their day-to-day lives as this will increase energy bills⁵. Women in rural areas are particularly at risk of isolation when the cost to engage in public life becomes too much. Lack of transportation and lack of quality broadband service in rural areas are barriers to women engaging with public life, and the rising costs of both will further impact on women's ability to leave the home. This is a gendered impact as women are more likely to rely on public transportation to take short journeys to engage in public life, unlike men who are more likely to take it for long journeys, such as commuting to work⁶. The Strategy does not deal with any structural issues that have made women vulnerable to the worst impacts of poverty, and we are deeply concerned that, if it goes ahead as is, we will continue to see rising levels of poverty and deprivation.

Cross-Strategy Alignment

Since its publication, civil society has been clear in its rejection of this Strategy on the basis that it is not fit for purpose. While this is the case for many reasons, some of the recommendations in the Strategy are directly contradictory to other cross-departmental and Executive strategies. Perhaps the most striking example of this is the outcome, "The benefits of a good family structure will be promoted," citing that, "...families that break apart are more than twice as likely to experience poverty as those whose families stay together"⁷. This is incredibly harmful rhetoric, particularly in cases where relationship abuse is present. Many women choose not to leave abusive relationships for fear of being financially worse-off - financial abuse occurs in 99% of domestic violence cases⁸. The Ending Violence Against Women and Girls (EVAWG) Strategy calls for "Joined up decision-making and governance" under the outcome, "All of government and society working better together to end violence against women and girls". We see the Department encouraging "good family structure," which is not defined, directly in contrast to the work of the EVAWG Strategy. While lone parent households are more likely to be in poverty, the Strategy should be exploring ways to make it easier for single parent households to exist above the poverty line.

⁵ AdviceNI. *Disability Action – Cost of Living Crisis* (https://www.adviceni.net/about/news/disability-action-cost-living-crisis#_ftn3)

⁶ Women's Policy Group (WPG) (2021). *NI COVID-19 Feminist Recovery Plan: Relaunch – One Year On* ([WPG-COVID-19-Feminist-Recovery-Plan-Relaunch-One-Year-On.pdf](https://www.wpg-ni.org.uk/wp-content/uploads/2021/06/WPG-COVID-19-Feminist-Recovery-Plan-Relaunch-One-Year-On.pdf) ([wrda.net](https://www.wrda.net)))

⁷ Department for Communities (2025). *The Executive's Anti-Poverty Strategy (2025-2035)* (<https://www.communities-ni.gov.uk/sites/default/files/2025-06/ni-executive-anti-poverty-strategy-2025-2035.pdf>)

⁸ National Network to End Domestic Violence (NNEDV). *About Financial Abuse* (<https://nnedv.org/content/about-financial-abuse/>)

Structure of the Strategy

Besides our grave concerns around the content of the Strategy, we have serious concerns about the structure of the Strategy. Plainly speaking, this is not a strategy. The Audit Office⁹ called for a, “...an integrated, cross-departmental strategy,” and stated that there should be, “...properly defined and more specific actions, including early intervention and prevention, and that [the Department] can demonstrate clear links between actions and reducing the scale of poverty”. The Public Accounts Committee¹⁰ joined in the call for, “...targets and outcomes that are quantitative, qualitative and timebound to properly measure performance”. The Public Accounts Committee also recommended that, “There is a strong argument for investing in long-term, preventative measures...which would save public money in the future”.

Despite these recommendations and other useful recommendations from both the Audit Office and the Public Accounts Committee, the Strategy falls short on all of them. There are no timelines, no indicators of success, nor modes of measuring what success looks like. There are also no robust monitoring plans, despite this being a ten-year strategy. The actions that the Department has included in the Strategy are things the Department is already doing or things the Department has already announced. There are also few to no costings within the Strategy, despite the Public Accounts Committee flagging this as an issue. There is nothing strategic about the Strategy, and we strongly feel that the Department must go back to the drawing board in order to deliver a strategy that can actually tackle the issue of poverty.

Anti-Poverty Strategy Group Recommendations

Even before the publication of the Strategy, the Anti-Poverty Strategy Group published outcomes with calls to action that encompassed what the Strategy should look like. Since the publication of the draft Strategy, they have updated their recommendations. While we reject the Department’s Strategy, we are firm in our belief that the Department does not have to start from scratch on a new strategy, but can use the work that has already been done by experts. Below is the work of the Anti-Poverty Strategy Group:

Strategic vision: *“Northern Ireland is an equal society where poverty and its impacts are eradicated, and that respects, protects, promotes and fulfils the rights of those at risk of poverty to ensure they achieve their aspirations*

Outcome 1

⁹ NI Audit Office (2024). *Child Poverty in Northern Ireland*. (<https://www.niauditoffice.gov.uk/files/niauditoffice/documents/2024-03/NI%20Audit%20Office%20Report%20-%20Child%20Poverty%20in%20Northern%20Ireland.pdf>)

¹⁰ Public Accounts Committee (2024). *Public Accounts Committee – Report on Child Poverty in Northern Ireland*. (<https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/public-accounts/reports/report-on-child-poverty-in-northern-ireland/>)

- *The creation of an Anti-Poverty Act which will ensure that the rights of people experiencing or at risk of poverty are promoted, protected, and realised.*
 - *Creation of an Anti-Poverty Act containing statutory commitments and objective measures to eradicate poverty over twenty years*
 - *Commitment to an Anti-Poverty Strategy with clear, time-bound targets for the reduction of poverty by fifty percent over ten years*
 - *Creation of an independent Anti-Poverty Commission to monitor and promote the eradication of poverty and income inequality*

Outcome 2

- *Working towards eradication by 2045, child poverty will be reduced by half over the lifetime of this Strategy.*
 - *Introduce a new weekly Child Payment to all children in poverty.*
 - *Restore the value of key social security benefits for children to levels prior to austerity cuts.*
 - *Reduce family outgoings, and make education cost-free.*
 - *Deliver a new Executive Early Education and Childcare Strategy, targeting families in poverty, which will provide accessible, affordable, high equality, flexible and sustainable childcare.*
 - *Provide targeted interventions for children with specific additional vulnerabilities.*

Outcome 3

- *No working age person shall live in poverty, regardless of whether they are in work, seeking work or unable to work. All those of working age will have sufficient income to participate fully in society and can access services and pathways to sustained and meaningful employment.*
 - *Address low pay and precarious work, reducing poverty and the risk of poverty.*
 - *Ensure people do not live in poverty through a robust, transparent and human rights-based benefits and social security system.*

Outcome 4

- *Working towards eradication by 2045, poverty among older people will be reduced by half over the lifetime of this Strategy. Older people experiencing or at risk of poverty will have adequate income and support in relation to their economic, physical, and mental wellbeing to ensure their equal participation in society.*
 - *Press UK government to maintain and improve financial support: protect social welfare benefits; protect the Triple Lock; and review the adequacy of State Pension.*

- *The NI Executive should ensure addressing poverty in later life is identified as a priority in the Programme for Government and associated delivery plans and actions, in the context of planning for an ageing population.*
- *Maximise and improve older people's access to benefits, advice, and support.*
- *Address financial disadvantage and material deprivation experienced by older people.*
- *Support measures for older people of 'working age'.*
- *Improved data collection and research on poverty and older people.*

Outcome 5

- *We have attractive, safe, accessible, welcoming, and sustainable environments in the most deprived areas.*
 - *Investment is required for the 20% most multi-deprived communities to move people and communities out of poverty.*
 - *Addressing and delivering on Regional Balance.*
 - *Communities must be part of the decision-making process to break the cycle of poverty.*
 - *Investment in Community Wealth Building.*

Outcome 6

- *All people experiencing or at risk of poverty have equal access to high quality public services that meet their needs in a timely manner and are based on dignity, fairness, and respect.*
 - *Housing provision and support.*
 - *Access to online services and transport.*
 - *Access to independent advice services and justice.*
 - *Actions to tackle specific types of poverty.*

We encourage the Department to adopt these recommendations and other recommendations from the Anti-Poverty Strategy Group to ensure a robust, wide-reaching, and impactful Anti-Poverty Strategy.

Mitigating Impact

We direct the Department to guidance from the Equality Commission¹¹ on “Consideration of measures which might mitigate any adverse impact; and alternative policies which might better achieve the promotion of equality of opportunity”:

¹¹Equality Commission for Northern Ireland. (2005). *Section 75 of the Northern Ireland Act 1998: Practical Guidance on Equality Impact Assessment*.

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*

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 final EQIA. Considering the scope and potential impacts of the Strategy, 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 policy-development and 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 policy-development and 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 crisis¹². 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 OECD¹³ highlights that best practice for gender budgeting is to embed it at all levels of policy- and budget-making: planning,

¹² 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/>)

¹³ OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, (<https://doi.org/10.1787/9574ed6f-en>).

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.

Conclusion

Poverty and deprivation are constants in our society, but they do not have to be. We urge the Department to take on the recommendations of the Anti-Poverty Strategy Group as well as the multitude of experts that have called for a strategy fit for purpose. We would be happy to meet with the Department to further discuss our response or to assist in any way that may be helpful.