



NI WOMEN'S BUDGET GROUP

NORTHERN IRELAND WOMEN'S BUDGET GROUP (NIWBG) RESPONSE TO THE DRAFT PROGRAMME FOR GOVERNMENT OUTCOMES FRAMEWORK EQUALITY SCREENING AND EQIA DOCUMENT

Northern Ireland Executive

Prepared by Alexandra Brennan (Coordinator) of NIWBG

April 2021

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 Northern Ireland Executive.

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

General Comments:

NIWBG is disappointed to see the lack of meaningful assessment of how the Programme for Government Outcomes Framework may promote or impact the equality of Section 75 groups. Despite completing an equality screening and Equality Impact Assessment (EQIA) for the policy, the nearly identical answers for each question and the failure to properly analyse each group individually does not provide consultees with any specific information on the objectives. While we understand that the hope within the Executive Office is that this Outcomes Framework will promote equality for all, the assessment of equality is the space to demonstrate how exactly the Outcomes will achieve this goal. By ignoring the nuances in the level of equality amongst the Section 75 identities, including how they may intersect with other Section 75 identities and the role geographical settings play, the Executive's 'one size fits all' approach to equality at the ex-ante stage may later lead to equality impacts that could have been mitigated if a proper analysis were conducted.

Throughout the documents, the use of indicators to guide the implementation of Outcomes was suggested as a way to monitor equality and progress. A key requirement for effective indicators is that they are informed by comprehensive disaggregated data. However, gender disaggregated data is limited and when paired with additional Section 75 characteristics, the data becomes poorer. This leads to poor policy making, as sufficient data is needed to conduct a thorough assessment of equality and create robust indicators that accurately monitor equality impacts and promotions. Additionally, indicators should not be viewed as a substitute for an equality assessment. The indicators will only provide ex-post evaluation of the policy's effects on women and other Section 75 groups, which does not meet the Section 75 requirement of continuous assessment of equality.

An additional concern is the 'live' aspect of the Programme for Government Outcomes Framework and the indicators. We appreciate that the Executive Office must be flexible, as demonstrated when the pandemic hit in March 2020. However, it is the equality assessment that should be 'live,' not the Outcomes Framework nor the indicators. As the equality assessment is a continuous analysis of equality considerations related to the policy, this must constantly be returned to and updated before, during and after the policy is put in place. If the Outcomes Framework and the indicators were to change in the way that the equality assessment should, then any change would need to be consulted upon not only with those in the Assembly but with relevant stakeholders, including civil society.

As mentioned above, the lack of disaggregated data inhibits a proper assessment of equality on Section 75 grounds. In the Draft Outcomes Framework Equality Impact Assessment Consultation Document under Section 3: Consideration of available evidence, the only data provided within the *Gender* section is that 49% of the population is male and 51% of the population is female – there is an acknowledgement that there is no data on gender identity followed by a link to a general paper on gender equality produced by the Equality Commission

in 2016. Not only is there no brief analysis within the section outside of basic population statistics, but the link provided is to a possibly out-dated assessment not conducted within the Executive Office. A similar lack of assessment was conducted for the *Sexual Orientation*, *Racial Group* and *Age* sections. Although the *Persons with a Disability* section contained a more detailed description, there was no analysis paired with it. The 'Existing Inequalities' section outlines some widespread inequalities in Northern Ireland, but it misses the opportunity to assess differing levels of equality of opportunity and outcome that affect the various Section 75 groups. This level of analysis should be in the equality assessment and the analysis presented in these sections is not enough to make up for that absence.

We can appreciate that this past year has been exceptional and that aligning the aspirations the Executive Office has for Northern Ireland for the upcoming year with the flat budget received from Westminster for the upcoming fiscal year is a difficult task. However, we are concerned at how disconnected the Draft Outcomes Framework is from Budget 2021-2022. Typically, the Programme for Government is supposed to inform the creation of the Budget – due to the delayed UK Spending Review and unexpected funding amount, this did not happen. Yet, it cannot be said that the Budget informed the creation of the Outcomes Framework, as the constrained nature of the Budget is not replicated in the Draft Outcomes Framework. The lack of relation between the two documents is concerning to us, especially as the Draft Outcomes Framework is mainly aspirational and does not reflect the funding that has been secured.

Gender Budgeting:

The current policy- and budget-making process is far from 'neutral' – they have gendered consequences, whether the consequences be intended or not¹. 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.

A scoping study (2013)² commissioned by the Equality Commission considers how gender budgeting tools can be used in meeting Section 75 requirements and how the international models have useful application in Northern Ireland. Quinn concludes that applying impact assessment processes to mainstream gender equality is '...a worthwhile enterprise, both in terms of the recognised demand for a deeper application of the Section 75 duties to the budget process but also in terms of the wealth of methodologies associated with gender responsive budgeting which are adaptable to the Northern Ireland context' and 'vital [at] all levels of government ... as a means of fulfilling Section 75 duties'³.

¹ Angela O'Hagan (2017). Gender budgeting in Scotland: a work in progress ([\[24499471 - Administration\] Gender budgeting in Scotland. A work in progress \(1\).pdf](#))

² Sheila Quinn (2013). Equality Responsive Budgeting ([Equality Responsive Budgeting \(equalityni.org\)](#))

³ Quinn (n 2)

We refer the Executive Office to the work undertaken by OECD in this area. A 2018 survey⁴ by OECD determined that gender mainstreaming had been adopted in nearly half of OECD Member countries (17). OECD considers progress⁵ by countries in respect of three measures – establishing a strategic framework, development of tools of implementation and the creation of an enabling environment – demonstrating the considerable richness of international experience in offering models of good practice. That gender budgeting can be implemented in a number of ways is advantageous to Northern Ireland, as it can build upon existing legislation, effective budget and policy models and administrative structures.

We would recommend that gender budgeting expertise be incorporated into the Executive Office's equality assessment process and that the Executive Office builds capacity for gender and equality mainstreaming in their wider policy-making process. We urge officials to engage with working papers published by the research team consisting of Prof. Ann Marie Gray, Prof. Joan Ballantine and Dr. Michelle Rouse at Ulster University⁶ in order to understand potential benefits of gender budgeting. The NIWBG is partnered with the research team on a project focused on gender budgeting potentials in Northern Ireland. We would be pleased to meet with the Executive Office to further discuss gender budgeting as a tool to help fulfil the Executive Office's Section 75 requirements.

⁴ OECD (2020). Policy framework on sound public governance: baseline features of governments that work well (https://www.keepeek.com//Digital-Asset-Management/oecd/governance/policy-framework-on-sound-publicgovernance_c03e01b3-en)

⁵ Ibid.

⁶ [Gender Budgeting Working Paper 1: What does the literature tell us? Lessons from Northern Ireland \(NI\)](#) & [Gender Budgeting Working Paper 2: Case Study: Apprenticeships in Northern Ireland](#)

Programme for Government Outcomes Framework - Equality Impact Assessment Questionnaire

We are seeking your views on the potential impacts of the delivery of the Outcomes Framework on the nine groups contained within Section 75 of the Northern Ireland Act 1998; and on the potential impacts on those living in urban and rural areas.

Please note, for your response to be included in our analysis, you must answer questions marked with a star (*) in [Section 1: About you](#).

You can respond on all Outcomes discussed in the Consultation Document, or just those of interest or relevance to you.

Space is provided for you to include any comments.

Our preferred way for you to respond to this consultation is [online](#).

Please return your completed questionnaire to:

Email: pfg@executiveoffice-ni.gov.uk

Post: Programme for Government Team,
The Executive Office
Block E, Castle Buildings
Stormont Estate
Belfast
BT4 3SR

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Section 1: About you

1. Are you responding as an individual or on behalf of an organisation? *

Individual

On behalf of an organisation

If responding on behalf of an organisation, please tell us your organisation's name:

Northern Ireland Women's Budget Group

2. Please provide your contact details below:

Name*: Alexandra Brennan

Address:

Email address*:

info@niwbg.org

Phone number: 07789

255562

3. Which of the following best describes the sector you work in?

This will assist us in monitoring the range of respondents the consultation has reached.

Central government

Local government

Statutory body (for example, health, education, transport, housing etc.)

Private sector

Charity / Community / Voluntary

Student

None

Other (please specify):

4. May we contact you to discuss your response to this consultation? * *This may be to follow up any specific points we need to clarify.*

Yes

No

5. May we contact you in future about the Programme for Government? *

For example, to provide you with a link to the results of this consultation, to inform you of further consultations or provide updated information on the Programme for Government.

Yes

No

- 6. To support transparency in our decision making process, all responses to this consultation will be made public (subject to our [Moderation Policy](#)). This will include the name of the responding organisation (if applicable). However, names of individuals will only be published if you give consent below. Please note we will not publish your contact details. ***

Yes, I consent to my name being published with my response

No, please remove my name before publishing my response

Section 2: Equality Impact

This Framework is aiming to have wide reaching effects and as such may have implications beyond the areas and issues it aims to impact upon. We would welcome views on how delivering this Programme for Government Outcomes Framework may affect any particular groups in society.

More information on the Outcomes and Key Priority Areas is available in the [Consultation Document](#).

Our children and young people have the best start in life

1. Please describe any effect you think the delivery of this Outcome may have on the nine groups contained within Section 75 of the Northern Ireland Act.

	Positive effect	No effect	Negative effect
People of different religious belief	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different political opinion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different racial groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different marital status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different sexual orientation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Men and Women generally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with a disability and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with dependants and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

Of course, there will be effects that stem from the Outcome, 'Our children and young people have the best start in life,' which will become clearer when there are concrete policies attached to carry out the Outcome. However, the vagueness of the Outcomes Framework document makes it difficult, from an outsider's perspective, to determine how those we advocate for will be affected. The equality assessment presented alongside the Draft Outcomes Framework, although lacking much of the analysis required when assessing equality, needs to be reviewed and amended on a continuous basis to constantly monitor how the Outcomes and their subsequent policies affect Section 75 groups and intersecting Section 75 identities.

2. Please describe any effect you think the delivery of this Outcome may have on those living in urban and rural areas.

	Positive effect	No effect	Negative effect
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Programme for Government Framework - Equality Impact Assessment Questionnaire

People living in urban areas

People living in rural areas

Please provide any further comments you may have in relation to your response.

There will be effects on those living in urban and rural areas, and those effects may be felt differently by a person living in a rural area who commutes to an urban area versus a person living in a rural area who works/studies within their community, for example. Therefore, a continuous assessment of the policy and its equality considerations is crucial, and where new effects are recognised, this needs to be reflected in the ongoing equality assessment.

We live and work sustainably – protecting the environment

1. Please describe any effect you think the delivery of this Outcome may have on the nine groups contained within Section 75 of the Northern Ireland Act.

	Positive effect	No effect	Negative effect
People of different religious belief	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different political opinion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different racial groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different marital status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different sexual orientation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Men and Women generally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with a disability and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with dependants and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As mentioned above, there will be effects that stem from the Outcome, ‘We live and work sustainably – protecting the environment,’ and the specific ways in which it affects each Section 75 group will become apparent when more concrete policies are paired with the Outcome. Without any indicators or policies attached to the Outcome, it is difficult to determine specifically how each group will be affected, positively and/or negatively. In our response to the Draft Outcomes Framework Consultation and in our **General Comments** section above, we note that a more concrete Programme for Government, even the inclusion of the indicators, would have been preferable as it would allow us to properly assess how the groups we advocate for could be affected. The equality assessment presented alongside the Draft Outcomes Framework, although lacking much of the analysis required by an equality assessment, needs to be reviewed and amended on a continuous basis to constantly monitor how the Outcomes and their subsequent policies affect Section 75 groups and intersecting Section 75 identities.

2. Please describe any effect you think the delivery of this Outcome may have on those living in urban and rural areas.

	Positive effect	No effect	Negative effect
People living in urban areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People living in rural areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As mentioned in our response to this question for the first listed Outcome, this Outcome will affect those living in both urban and rural areas. However, we advocate for the continuous assessment of the policy and its equality considerations and where new effects are recognised, it needs to be reflected in the equality assessment.

We have an equal and inclusive society where everyone is valued and treated with respect

1. Please describe any effect you think the delivery of this Outcome may have on the nine groups contained within Section 75 of the Northern Ireland Act.

	Positive effect	No effect	Negative effect
People of different religious belief	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different political opinion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different racial groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different marital status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different sexual orientation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Men and Women generally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with a disability and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with dependants and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

Our response to this question is similar to our past two answers to this question – there will be effects, but we cannot predict what those might be due to the vagueness of the Draft Outcomes Framework and its equality assessment. The question asks about the effect the delivery of the Outcome will have, without providing information on how this or any of the other Outcomes will be delivered. This greatly restricts our ability to respond to the question. We can only recommend that the equality assessment presented alongside the Draft Outcomes Framework needs to be reviewed and amended on a continuous basis to constantly monitor how the Outcomes and their subsequent policies affect Section 75 groups and intersecting Section 75 identities.

2. Please describe any effect you think the delivery of this Outcome may have on those living in urban and rural areas.

	Positive effect	No effect	Negative effect
People living in urban areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People living in rural areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As previously stated, there will be effects felt by both those living in urban and rural areas, but without providing us with plans on how to deliver the Outcome, we cannot predict every possible way this could be implemented and assess all of the possible effects. We advocate for the continuous assessment of the policy and its equality considerations and where new effects are recognised, it needs to be reflected in the equality assessment.

We all enjoy long, healthy, active lives

1. Please describe any effect you think the delivery of this Outcome may have on the nine groups contained within Section 75 of the Northern Ireland Act.

	Positive effect	No effect	Negative effect
People of different religious belief	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different political opinion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different racial groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different marital status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different sexual orientation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Men and Women generally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with a disability and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with dependants and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

Again, the Outcome, 'We all enjoy long, healthy, active lives,' will have an effect on all Section 75 groups. To list all the ways in which the delivery will affect these groups would be to conduct an assessment of equality, which should have been presented within the Draft Outcomes Framework equality screening and EQIA documents. The equality assessment presented alongside the Draft Outcomes Framework, although lacking much of the analysis required by an equality assessment, needs to be reviewed and amended on a continuous basis to constantly monitor how the Outcomes and their subsequent policies affect Section 75 groups and intersecting Section 75 identities.

2. Please describe any effect you think the delivery of this Outcome may have on those living in urban and rural areas.

	Positive effect	No effect	Negative effect
People living in urban areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People living in rural areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

People living in both urban and rural areas will be affected by the policies delivered to achieve this outcome. However, without a clear idea of how the TEO plans to deliver this Outcomes or without indicators attached to it, the affects vary as the Outcome could be achieved in several ways. We advocate for the continuous assessment of the policy and its equality considerations and where new effects are recognised, it needs to be reflected in the equality assessment.

Everyone can reach their potential

1. contained within Section 75 of the Northern Ireland Act.

People of different religious belief	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different political opinion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different racial groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different marital status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different sexual orientation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Men and Women generally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with a disability and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with dependants and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As stated before, the Outcome is too aspirational to detect the exact affects it will have on a specific Section 75 group like Men and Women generally, let alone those whose identity intersects across the Section 75 groups. Because the Outcome is so vague, however, it will most definitely affect each of the protected groups. Therefore, the equality assessment presented alongside the Draft Outcomes Framework, although lacking much of the analysis required by an equality assessment, needs to be reviewed and amended on a continuous basis to constantly monitor how the Outcomes and their subsequent policies affect Section 75 groups and intersecting Section 75 identities.

2. Please describe any effect you think the delivery of this Outcome may have on those living in urban and rural areas.

	Positive effect	No effect	Negative effect
People living in urban areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People living in rural areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

People living in both urban and rural areas will be affected by the policies delivered to achieve this outcome. As mentioned in example given in response to the first Outcome, groups that engage regularly with both urban and rural areas will be affected differently than those that mainly stay

within one area. The ways in which Section 75 identities intersect with geographical regions must also be considered in the equality assessment. We advocate for the continuous assessment of the policy and its equality considerations and where new effects are recognised, it needs to be reflected in the equality assessment.

Our economy is globally competitive, regionally balanced and carbon-neutral

1. Please describe any effect you think the delivery of this Outcome may have on the nine groups contained within Section 75 of the Northern Ireland Act.

	Positive effect	No effect	Negative effect
People of different religious belief	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different political opinion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different racial groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different marital status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different sexual orientation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Men and Women generally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with a disability and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with dependants and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As mentioned in response to the other Outcomes, the information given is not enough to determine some effects that this aspect of the policy will have on any of the Section 75 groups. A thorough analysis should have been completed and present in the equality assessment to detect what effects an Outcome as aspirational as this could have on the Section 75 groups. We advocate that the equality assessment presented alongside the Draft Outcomes Framework needs to be reviewed and amended on a continuous basis to constantly monitor how the Outcomes and their subsequent policies affect Section 75 groups and intersecting Section 75 identities.

2. Please describe any effect you think the delivery of this Outcome may have on those living in urban and rural areas.

	Positive effect	No effect	Negative effect
People living in urban areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People living in rural areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As stated previously, the Outcome is too vague to pinpoint some effects that it may have on people living in urban or rural areas. However, we know that a policy of this magnitude will in some way effect people living in urban and rural areas. For this reason, we advocate for the continuous assessment of the policy and its equality considerations and where new effects are recognised, it needs to be reflected in the ongoing equality assessment.

Everyone feels safe – we all respect the law and each other

1.

contained within Section 75 of the Northern Ireland Act.

People of different religious belief	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different political opinion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different racial groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different marital status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different sexual orientation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Men and Women generally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with a disability and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with dependants and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As mentioned before, these sorts of questions should have been answered in the actual equality assessment documents. To provide examples of how the policy or the specific Outcome would affect each Section 75 group would be to conduct an assessment of equality, a task that requires disaggregated data and months of analysis – an option not available when responding to a consultation. However, we do know that the Section 75 groups will be affected by the delivery of this Outcome. For this reason, we advocate that the equality assessment presented alongside the Draft Outcomes Framework needs to be reviewed and amended on a continuous basis to constantly monitor how the Outcomes and their subsequent policies affect Section 75 groups and intersecting Section 75 identities.

2. Please describe any effect you think the delivery of this Outcome may have on those living in urban and rural areas.

Positive effect No effect Negative effect

People living in urban areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People living in rural areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

Our answer for this Outcome is the same for every Outcome – we know that people living in urban and rural areas will be affected by the delivery of this Outcome. However, the lack of information surrounding the Outcome and its delivery limits our input as we are only responding to a consultation, but it should have been included in the equality assessment. We advocate for the continuous assessment of the policy and its equality considerations and where new effects are recognised, it needs to be reflected in the equality assessment documents.

We have a caring society that supports people throughout their lives

1. Please describe any effect you think the delivery of this Outcome may have on the nine groups contained within Section 75 of the Northern Ireland Act.

	Positive effect	No effect	Negative effect
People of different religious belief	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different political opinion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different racial groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different marital status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different sexual orientation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Men and Women generally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with a disability and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with dependants and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As stated above, the Outcome, ‘We have a caring society that supports people throughout their lives,’ will have an effect on all Section 75 groups. To list all the ways in which the delivery will affect these groups would be to conduct the analysis that should have been present within the equality assessment documents. We advocate that the equality assessment presented alongside the Draft Outcomes Framework needs to be reviewed and amended on a continuous basis to constantly monitor how the Outcomes and their subsequent policies affect Section 75 groups and intersecting Section 75 identities.

2. Please describe any effect you think the delivery of this Outcome may have on those living in urban and rural areas.

	Positive effect	No effect	Negative effect
People living in urban areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People living in rural areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As previously stated, there will be effects felt by both those living in urban and rural areas, but without providing plans on how to deliver the Outcome or indicators on how to measure the Outcome, we cannot predict every possible way this could be implemented and assess all of the possible effects. We advocate for the continuous assessment of the policy and its equality considerations and where new effects are recognised, it needs to be reflected in the ongoing equality assessment.

People want to live, work and visit here

1. contained within Section 75 of the Northern Ireland Act.

People of different religious belief	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different political opinion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different racial groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different marital status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People of different sexual orientation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Men and Women generally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with a disability and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People with dependants and people without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As mentioned in response to other Outcomes, there will be affects that stem from the Outcome, 'People want to live, work and visit here,' which will become clearer when there are concrete policies attached to carry out the Outcome. However, the vagueness of the Outcomes Framework document makes it difficult, from an outsider's perspective, to determine how those we advocate for will be affected. The equality assessment presented alongside the Draft Outcomes Framework, although lacking much of the analysis required by an equality assessment, needs to be reviewed and amended on a continuous basis to constantly monitor how the Outcomes and their subsequent policies affect Section 75 groups and intersecting Section 75 identities.

2. Please describe any effect you think the delivery of this Outcome may have on those living in urban and rural areas.

	Positive effect	No effect	Negative effect
People living in urban areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
People living in rural areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any further comments you may have in relation to your response.

As stated above, there will be effects on people living in urban and rural areas, and we advise the TEO to conduct further analysis into what that might be ahead of formulating policies and indicators for the Outcome. We advocate for the continuous assessment of the policy and its equality considerations and where new effects are recognised, it needs to be reflected in the ongoing equality assessment.

Section 3: Additional information

1. Do you have any further comments relevant to this consultation?

In relation to the documents provided for consultation, we have a few comments on specific aspects of the text. We recognise the commitment on page 26, ‘to place equality of opportunity and good relations at the centre of all policy-making,’ and to promote equality of opportunity at every opportunity on page 21, as well as the commitment for, ‘the active management of policies and programmes in support of achieving equality,’ on page 20. However, neither of these commitments are reflected in the screening and impact assessment exercises. While we appreciate the commitment to securing equality for ‘all,’ we need to see a demonstration of that pledge within the equality consideration processes related to the policy.

The equality screening document assures that the outcomes will apply, ‘equally to everyone and exclude no one.’ We appreciate the assurance; however, we need clarity around how this will be achieved, what data will inform the plans of delivery and how the indicators will be developed to measure successful implementation. The use of generalised language, such as ‘they all,’ and ‘everyone,’ when discussing how policy will affect people ignores people’s differential experience of equality and inequalities that is dependent on individual characteristics and circumstances. Because of this, equality will not be promoted or impacted in the same manner by each proposed policy. This needs to be not only acknowledged but expanded upon in the ongoing equality assessment.

The equality screening document also cites a wellbeing model that is not human rights based. This adds to the lack of clarity surrounding the statement, ‘equally to everyone and exclude no one,’ as a wellbeing model not grounded in human rights does not have a clear relation to equality. In the EQIA, the idea that wellbeing is improved by, ‘tackling disadvantage and driving economic growth,’ as stated on page 6, is also not equal to securing equality nor to securing a society as quoted from NDNA 4.4: ‘that reflects the best international standards of human rights.’

The What Matters Most 2020 exercise, which took account of religion, locality and age is repeatedly referred to throughout the screening document. Consultations took place with groups of young people, people with disabilities, ethnic minorities, and LGBTQ+ people, yet there was no indication that the views of women and men in general and in these groups were taken into account. We believe this is a gap in the analysis conducted to inform the Draft Outcomes Framework.

We highlight that on page 20, it is stated that, 'The Programme for Government, once developed, must demonstrate due regard to equality of opportunity.' The Programme for Government does not have due regard to equality of opportunity, but rather due regard to *the need to promote* equality of opportunity – this is a positive or active duty. We need to see commitment to this not only with the objectives of the Government, but within the identification of inequalities and the indicators to measure progress in monitoring and reviewing of the delivery of the Outcomes.