

### Working Paper 3: Gender Audit of the Northern Ireland Programme for Government 2016-21

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#### Introduction

This working paper is the third in a series which seeks to establish the potential for gender budgeting in Northern Ireland (NI). The research relates to a joint initiative between Ulster University, the NI Women's Budget Group (NIWBG) and the Scottish Women's Budget Group (SWBG). Gender budgeting is a tool used to bring about gender-equal change by examining the resources allocated to policy proposals, and their potential effects on women and men. It seeks to redistribute resources in a way that redresses imbalances in women and men's use of, access to and benefit from public services and finances (Jubeto, 2010). A central proposition of gender budgeting is that budgets are products of established gender norms within government processes and practices, and as such they result in gender blind policy and resource decisions which contribute to the persistent social and economic disadvantage that women face (O'Hagan, 2013).

Scholars working on policy analysis argue that gender remains a blind spot for policy makers, underpinned by a lack of gender disaggregated data an inadequate understanding of how policy outcomes affect the lives of women and men differently (Bacchi and Goodwin, 2016; O'Hagan, 2020). Research on the NI Civil Service (NICS) indicates that organisational culture, among other factors, has led to problems with the implementation of public sector gender equality duties, through the vehicle of the Section 75 equality impact assessment process (Ballantine et al., 2016; Rouse, 2018). These problems create a cyclical challenge: gender equal policy outcomes will not be achieved until budget decisions reflect a robust gender analysis, but gender analysis of budgets will not become a reality while gender is not well understood or integrated into the policy development process. With these challenges in mind, it is useful to examine the visibility of gender in overarching policy documents, in order to ascertain the extent to which gender equality policy making is implemented. This policy brief analyses the NI Executive's Draft Programme for Government (PfG) 2016-21 as an example of macro level policy. How women and gender equality are positioned here has far reaching implications both symbolically and substantively. The PfG reflects the NI Executive's strategic policy priorities. In addition to articulating the NI Executive's vision for society, the PfG is the overarching framework underpinning the budget and supported by key Executive strategies, including an Investment Strategy, an Economic strategy and an Anti-Poverty Strategy<sup>1</sup>. How gender equality is situated and understood in this document therefore establishes the parameters for subsidiary policy and resource allocation.

<sup>1</sup>The Investment Strategy for Northern Ireland 2011-2021, available at https://sibni.org/home/investment-strategy-isni/investment\_strategy\_for\_northern\_ireland\_2011\_-\_2021/; the Northern Ireland Economic Strategy, available at https://www.northernireland.gov.uk/publications/northern-ireland-economic-strategy. An anti-poverty strategy has not yet been published but there is an active child poverty strategy, available at https://www.communities-ni.gov.uk/publications/child-poverty-strategy.



### **Gender Inequality in NI and Policy Responses**

The first working paper in this series outlined evidence of deeply embedded gendered inequalities in NI (Ballantine et al., 2021). Recent statistics demonstrate persistent and worsening labour market inequality. While women constitute 48% of all those in employment, they represent 82% of those working in part time, often precarious, employment (NISRA, 2022). Only 60% of employed women with dependent children are in full-time employment compared to 95% of employed men with dependent children (NISRA, 2022). Furthermore, over a third of working age women are economically inactive, with the most common reason recorded as unpaid caring responsibilities (NISRA, 2022). This is particularly significant given that NI remains the only part of the UK without a childcare strategy, which has resulted in scarce and expensive provision and a social care sector which relies heavily on unpaid carers. The persistence of a startling gender pay gap of £127 (median) per week, with women in the 50-59 age group experiencing the greatest disadvantage compared to men, is evidence of the structural inequalities faced by women in the labour market (Wilson, 2020; NISRA, 2022).

In addition to impacting women's economic security, persistent gender inequality in NI has profound implications for women's physical security, with high femicide rates and domestic abuse accounting for 19% of all police recorded crime (Blunt, 2019; Powell, 2020; PSNI, 2020). There have been modest improvements in the representation of women in public life, which can be seen through the increased visibility of women in leadership roles across society. However, the data affirms that women remain under-represented in key decision-making roles and positions of power (Potter, 2020). Women's life opportunities continue to be inhibited by the persistence of deeply embedded gendered social norms which pre-dispose informal caring obligations and gender-based violence. As a response, policy approaches grounded in gender neutrality, have been insufficient to dislodge pernicious gender inequalities.

The statistics emphasise the importance of targeted and differentiated policy as a means of addressing stark gender inequalities, something that is currently lacking. NI has no active gender equality strategy, the last one having expired in 2016. Work remains ongoing within the Department for Communities to develop a new one, despite six years having passed. Additionally, the Executive Office collated and published cross-cutting gender disaggregated data from 2008-2015 but stopped when responsibility for gender equality moved to the Department for Communities. NI remains the only region in the UK without a strategy to tackle gender-based violence against women and girls, although one is currently being developed by The Executive Office. NI also compares unfavourably to other UK regions in the absence of a specific women's health plan or strategy. Gender equality objectives in policy making are reliant on the application of Section 75 equality impact assessments during the process of policy formation, something that was identified as problematic in the first working paper in this series (Ballantine et al., 2021). Issues include a tendency to screen out policy for gender analysis or apply only procedural or 'thin' compliance through ex-post paper processes (ECNI, 2017; Rouse, 2020). Research also demonstrates that gender neutrality is favoured by policy makers whose misunderstanding of impartiality has led them to operationalise equality duties as symmetrical, or same, treatment (Rouse, 2020). When it comes to the important task of promoting gender equality in NI, the policy landscape presents many challenges.



### Gender Equality and the PfG

During phase 1 of this gender budgeting project, the research team examined a wide range of policy and equality documentation from individual NI government departments. This working paper, however, will focus on the Executive's 2016-21 draft PfG to provide a case study of how gender is situated and understood within macro level policy in NI. It is worth noting that the draft version of the PfG was published for public consultation in 2016, shortly before the Executive and Assembly collapsed in January 2017. A final version of the PfG was not signed off by the Executive but the framework was adopted by the Senior Civil Service (SCS) during the 3-year absence of the devolved political institutions and formed the basis of most policy and spending decisions. This was the first NI PfG to use an outcomesbased accountability (OBA) approach (Orme, 2021), organised around 14 strategic outcomes, monitored and assessed through the measurement of 42 population level indicators over time. The intended benefits of adopting OBA included promoting more cross-departmental collaboration and ensuring that success can be more effectively measured. (TEO, 2016a). The framework was accompanied by an equality screening document and equality impact assessment (EQIA), and supported by outcomes delivery plans produced by Senior Responsible Owners and their outcome teams. The only published progress reports are the 2018/19 mid and end-year reports. Since January 2021 the NI Executive has published a new PfG outcomes framework for consultation, and an accompanying equality screening questionnaire and EQIA. However, this was not progressed amid the challenges associated with the Covid-19 pandemic and increasing political instability. The only current macro-level strategy is the Building Forward: Consolidated Covid-19 Recovery Plan. Table 1 shows the documents (10 in total) related to the 2016-21 PfG which are included within the scope of our analysis.



Table 1: Scope of analysis.

Programme for Government (PfG) Related Documents Included in Content Analysis.

Policy Documents	Publication Date	Length of Document		
Draft Programme for Government Framework 2016-21	26th May 2016	114 pages		
Draft Programme for Government Framework, Screening flowchart and template	Approved 20th April 2016 - not published at this time	23 pages		
Draft Programme for Government Framework, Equality Impact Assessment – Summary of Outcomes of Screening Exercise (EQIA)	26th May 2016	3 pages		
Programme for Government consultation document	28th October 2016	173 pages		
Programme for Government Equality Impact Assessment (EQIA)	28th October 2016	26 pages		
Programme for Government Framework working draft	15th January 2018	2 pages		
Outcomes Delivery Plan 2018-19	June 2018	93 pages		
Outcomes Delivery Plan 2018-19 Mid-Year Report	December 2018	98 pages		
Outcomes Delivery Plan 2018-19 End-Year Report	September 2019	110 pages		
Outcomes Delivery Plan	December 2019	95 pages		

Using a two-stage content analysis, this briefing paper examines the positioning of gender within the NI Executive's PfG and its associated equality assessments and delivery plans. The objective of the analysis is not to provide a critique on the extent to which the PfG reflects wider gender equality goals. Rather the objective is to understand how and where women and gender are located and understood in the context of the PfG. Content analysis describes a family of approaches for the systematic examination of texts. It has a long tradition, not least in policy analysis. Qualitative content analysis (employed in this analysis) is the close, comparative and organised reading of a set of texts to identify themes, intent or patterns (Creswell and Creswell, 2003). The first stage of the process involved sifting the documents to locate the frequency of key search terms, selected based on their relevance to the central question under investigation, with enough breadth to allow a full examination of all content pertaining to women, girls and gender equality. Downe-Wambolt (1992) emphasises that content analysis is much more than a counting process and should also involve linking the results to their context in order to make valid inferences from the data about the phenomena being studied. Thus, the second stage of our analysis sought to interpret the contextual use of key words in order to identify patterns, extrapolate intent and determine subsequent implications for gender equality.



### **Findings and Analysis**

The results of the first stage of the analysis are set out in table 2 below, showing the frequency of each key word across all 10 documents. It is clear that direct references to gender, women or girls are infrequent, with the numerical data demonstrating a preference in the PfG for the gender-neutral term 'people'. Across the suite of PfG documentation there are a total of 12 references to gender, 45 references to women, 39 references to female, and 9 references to girls. Terms relating to equality or inequality have some visibility across all documents, with the specific context of these references further explored in the next stage.

Table 2: Location and frequency of search terms in Programme for Government (PfG) related documents.

Subject Analysis: No. Words	Gender	Women	Female	Girl	Citizens	People	Equal	Equality(ies)	Inequality(ies)
Draft PfG Framework 2016-2021 (114 pages)	3	0	6	0	10	175	4	8	33
EQIA Draft PFG Screening (Apr 2016) (23 pages)	0	5	0	0	1	31	0	48	0
Draft PfG Framework EQIA (May 2016) (3 pages)	0	0	0	0	5	0	0	9	0
PfG Consultation EQIA (Oct 2016) (173 pages)	5	3	11	4	11	247	5	22	31
PfG Equality Impact Assessment (Oct 2016) (26 pages)	0	3	0	0	2	41	1	19	9
PfG Outcomes Framework (Jan 2018) (2 pages)	0	0	0	0	0	9	1	0	0
Outcome Delivery Plan 2018-19 (Jun 2018) (93 pages)	1	4	3	1	8	234	5	19	9
Outcomes Delivery Plan 2018-19 Mid-year Report (98 pages) (Dec 2018)	1	9	9	2	6	168	4	13	4
Outcomes Delivery Plan 2018-19 End-Year Report (110 pages) (Sept 2019)	1	14	10	2	4	216	5	20	5
Outcomes Delivery Plan (95 pages) (Dec 2019)	1	7	0	0	14	181	3	13	12
Total References	12	45	39	9	61	1,302	28	171	103

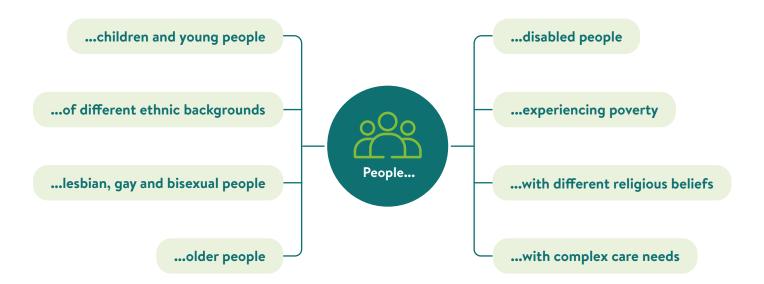


The second stage of the analysis identified the following nine key findings that reflect patterns or themes in the documents, linking the search terms to their context and inferring possible implications for gender equality.

### 1. The term 'people' is disaggregated for specific groups, but not for gender.

The focus of the PfG is firmly fixed at the aggregate level of 'people', framed within the context of the OBA approach which aims to 'provide a basis for improving the wellbeing of all citizens' rather than address specific equality issues directly (TEO, 2016a:114). It is true that use of the term people is not necessarily problematic. In fact, it can be used as an inclusive and anti-discriminatory alternative to dehumanising terminology, historically applied to marginalised groups. However, while the generic term 'people' is frequently unpacked in the PfG policy documentation to incorporate specific groups, this nuanced use does not extend to the acknowledgement of the specific inequalities faced by people of different genders. There are multiple instances where 'people' is disaggregated into targeted subgroups within the policy (Figure 1) but there is no discussion of gender inequalities or gender targeted actions. As such, the ubiquity of the term 'people' and its specific use in ways which include some groups but not women and men on the basis of gender, has the effect of consolidating the gender neutrality which underwrites the PfG policy documentation and serves to exclude women from the policy agenda as a group experiencing inequality.

Figure 1: Examples of disaggregation of 'people' in the PfG documents





# 2. References to gender are not substantive and don't reflect policy aims addressing women's experiences of gender inequality.

Analysis reveals that over half of the references to gender could be described as nominal rather than substantive, where the word gender is included in generic lists of Section 75 groups. The five remaining references to gender are located in contexts where any subsequent actions or activities would have the effect of benefiting men. These include references to the life expectancy gender gap in Northern Ireland, where men live on average 3 years less than women. Since the disadvantage in this instance rests with men, then men would be the likely beneficiaries of any remedial actions. Similarly, in the context of Outcome 7 (We have a safe community where we respect the law and each other) there is a recognition that the rate of re-offending varies by gender. Since the rate of reoffending is higher for men, then subsequent policy interventions are likely to have male beneficiaries. Similarly, where girls are discussed in relation to educational inequalities, the references only relate to the comparative under-achievement of boys.

### 3. Women are positioned in the PfG through the lens of motherhood and not as primary beneficiaries.

The most significant concentration of references to women across all the PfG documents are in the context of actions pursuant to Outcome 14; (We give our children and young people the best start in life). References to women under this outcome include the provision of targeted support for pregnant women identified as at risk of delivering a low birth-weight baby and include actions in furtherance of the PAUSE programme which aims to enable children to remain safely at home with women who have previously had children removed from their care. While undoubtedly positive, it is nevertheless noteworthy that the largest volume of references to women in the PfG documentation are captured where the primary objective relates to the wellbeing of children and where women are secondary beneficiaries. Women are recognised primarily in the context of motherhood. This is not problematic where there is equal recognition of women's agency, autonomy and capacity, but it may reflect an essentialised view of women and consolidate problematic gender norms which inhibit women's life opportunities.

In contrast, there is another, smaller cluster of references to women in the Delivery Plan reports of 2018/19 detailing actions pursuant to Outcomes 9 (We are a shared, welcoming and confident society that respects diversity) and 10 (We have created a place where people want to live and work, to visit and invest). These relate specifically to the participation of 500 women in the Women Involved in Community Transformation (WICT) Programme which 'helps women develop the skills to work in their communities; enables them to make new connections with community and voluntary groups; and supports them to become involved in positive community activity' (Department for Communities, 2019). While this action has undoubtedly been beneficial for the women involved, it is notable that the women's programme falls under the Executive's Tackling Paramilitarism, Criminality and Organised Crime Programme, a broad programme of activity flowing from the Fresh Start Agreement's commitment to reducing the influence of paramilitary organisations in communities. Building women's capacity is framed as a lever for developing community resilience to paramilitary influence and once again, they are secondary beneficiaries in this process (TEO, 2021a).



# 4. The PfG prioritises the biological sex descriptor 'female' over 'women' as a contextualised description of gender.

There are 39 references which use the descriptor 'female' across the sample, and it is more commonly used in sections that deal with substantive issues affecting women. Given that the term female is used to designate biological sex rather than gender, it is unsurprising that most of these references relate to women's participation in sport and programmes that promote physical activity. The word female also appears in the context of criminal justice issues like re-offending and actions pursuant to the Supporting People at Risk Programme (SPAR) in Hydebank Wood women's Prison. Biological language is common in criminal justice contexts but there is a danger that in broadly conflating sex with gender in this way, subsequent policy actions may fail to address the social issues which shape women's particular experiences with the criminal justice system or that give rise to women's offending.

The conflation of sex with gender is further evident in two distinct references to females, relating to issues that have no physical or biological elements, for example, reporting on actions 'enabling female writers from NI and the Rol to showcase their work' (TEO, 2019a). Inequality between men and women in a field like creative writing is rooted in the social and structural dynamics of gender roles and expectations, rather than being predicated on any biological differences. The use of biological language 'female' in relation to such issues, rather than the more contextualised descriptor 'woman', suggests a knowledge gap for policy makers when it comes to conceptualising exactly what gender inequality is.

## 5. References to gender equality, as raised by stakeholders, have been excluded from the PfG policy agenda despite binding international obligations.

Across the suite of 10 documents, the singular reference to gender equality occurs in the context of a summary of consultation responses, in which consultees identified the provision of high-quality childcare and support for women's participation in decision-making in public life as essential enablers of progress on gender equality (TEO, 2016b). Despite this recognition, neither childcare nor women's participation in decision-making and public life are mentioned again in the subsequent PfG literature examined within the scope of this analysis. Whilst a mapping exercise was carried out to highlight how the PfG Outcomes Development Plan 2018-19 aligns with the United Nations Sustainable Development Goals (DAERA, 2019), there have been no efforts to map compliance with binding obligations which arise in respect of international human rights treaties, and in particular those relating to gender equality arising from the Convention on the Elimination of Discrimination against Women (CEDAW). The PfG literature contains a singular generic recognition of its obligations in this regard; 'We will continue to fulfil our equality obligations including compliance with international human rights conventions' (TEO, 2016b:42). This acknowledgement does not extend to an elaboration of actions which would be required to give effect to the CEDAW Committee's recommendations on NI or indicators of progress towards greater protection and fulfilment of women's rights.



# 6. Outcome 3 of the PfG makes equality a high-level priority, but with no recognition that gender is a key factor and no indicators designed to evaluate progress on gender inequality.

References to 'equality' and 'equal' were mostly located in the context of Outcome 3 (We have a more equal society). The framework states, 'We also recognise our responsibility to deliver better equality outcomes across all areas of this Programme for Government' (TEO, 2016b:42) but there is little evidence of cross-pollination or the mainstreaming of equality into the substance of the other outcomes. Of particular concern is the absence of any gender specific indicators to measure progress on gender inequality, the most pervasive, systemic cause of disadvantage for half the population. It is of further note that the equality indicators included under Outcome 3 focus only on economic inequality as connected to education and employment. The scope of this outcome is therefore too narrow to fully engage with the cross-cutting nature of gender inequality as it impacts all areas of women's lives in the private and public spheres. A composite measure of gender inequality such as the World Economic Forum's Global Gender Gap Index (World Economic Forum, 2022) or the European Institute for Gender Equality's Gender Equality Index (EIGE, 2022), which measure gender parity across a range of domains, provide effective models that could be adapted.

### 7. There is a gender neutral approach taken to equality impact assessment.

It is concerning that the term gender is largely absent from the associated equality documentation since this is where one would reasonably expect to find an exposition of gender differentiated impact. The screening document does not engage meaningfully with differences in the experiences and needs of men and women across any of the screening questions. For example, in response to the question 'are there opportunities to better promote equality of opportunity between men and women', the document states that this is 'not applicable, [since] the PfG framework has no differential impact on this Section 75 group' (TEO, 2016c). This response is firmly grounded in the erroneous view that gender neutral policy will deliver gender equal outcomes. This is impossible in the context of pre-existing inequalities where neutral policy will do nothing to ameliorate those inequalities and can serve to compound them. Given that the accompanying EQIA document contains a range of data demonstrating persistent inequalities between women and men in Northern Ireland, the screening conclusion that the duty to better promote equality of opportunity between men and women is not applicable to the aims of the PfG is concerning.



### 8. The PfG's approach to equality duties suggests a formal, rather than substantive, paradigm.

Analysis of how equality is approached in the screening and equality impact assessment associated with the PfG, reveals evidence that the dominant understanding of equality is conceptually located within a formal rather than substantive equality paradigm. This means that emphasis is disproportionately focused on the avoidance of adverse impact (anti-discrimination) with little attention given to the potential to create greater equality of opportunity. The equality screening template is a particularly clear example of this approach across all Section 75 groups with the majority of screening questions having been deemed 'not applicable' (TEO, 2016c).

The default to formal equality is further affirmed by the view that a neutral approach to policy and resource allocation will correspond with equal outcomes. For example: 'The PfG Framework has no differential impact on any s. 75 group, and no direct impact on equality of opportunity or on good relations...it is anticipated that the impact of the Framework will be positive for individuals and groups benefitting from subsidiary strategies, policies and programmes' (TEO, 2016c:19). However, the substantive equality obligations arising from Section 75 of the 1998 Northern Ireland Act, require the promotion of 'equality of opportunity', which represents a departure from formal equality in the acknowledgement that measures need to be taken to rectify past discrimination. When different groups of people are on different starting points, equal treatment can never correspond with the equal outcomes anticipated in the content of the PfG equality assessment process (Equal Rights Trust, 2007; Baker et al, 2009).

# 9. PfG commitments to tackling inequality have not been operationalised through targeted measures.

Despite the formal approach to equality, there are references to existing inequalities across the sample, including commitments to ensure that 'inequality is eliminated wherever it might be found' so that 'a person's background, identity or ability should not be a barrier to playing a full and constructive role in society' (TEO, 2018a:22). The PfG Consultation document sets out an approach which extends beyond the avoidance of adverse impact to recognise the need to actively promote equality in government policy and resource allocation, stating; 'We want to instil as a norm the expectation that government intervention will not only avoid inequality but that it will actively promote enhancing equality and a common sense of fairness in all its actions through reflective practice' (TEO, 2016b:6). Notwithstanding these ideals, however, the absence of targeted measures across any of the suite of documents and the evidence of a formal approach to equality duties, suggests a gap between the rhetoric and its application. Where there are targeted indicators within the PfG, they focus on inequalities relating to health and education. The emphasis on these issues suggests a willingness to engage with discrete examples of inequality rather than addressing the broader systemic inequalities which exist between different groups.



#### Implications for Gender Budgeting

This analysis provides evidence of a range of issues that have implications for gender budgeting:

- The PfG does not deal with gender in substantive terms, rather women are situated in relation to biological and physical characteristics, for example, in the context of motherhood and life expectancy.
- This is indicative of a failure to understand gender at a conceptual level as both a social construct and active process. In failing to acknowledge the basis on which gender inequalities are constituted, it is difficult to see how subsidiary policy can be responsive to them.
- Further conceptual difficulty is revealed in respect of how equality is located and understood within the suite of documents analysed, particularly the dominance of formal equality as opposed to substantive commitments to promoting equality of opportunity.
- Despite identifying rhetorical commitments to addressing existing inequalities, the content
  analysis presented in this working paper reveals that equalities analysis is entrenched in an
  anti-discrimination paradigm. This presents as a focus on the avoidance of adverse impact
  and the failure to pro-actively consider how policy might be adapted to deliver benefits for
  disadvantaged groups.

Given the central aim of gender budgeting is that spending and revenue raising decisions should deliver gender equality outcomes, these conceptual and operational problems present significant challenges. Effective gender budgeting practice requires a joined-up approach from senior civil servants with policy and finance responsibilities in order to scrutinise budgets for adverse gender impacts, as well as adopting 'practices that will bring about gender equality between women and men' (Women's Budget Group, 2017). This process is irreconcilable with an environment where there is both a culture and entrenched practice of approaching equality duties from a gender neutral perspective. In our first working paper we outlined several practical tools for implementing gender budgeting, all of which are underpinned by an understanding that men and women experience different socio-economic realities due to systemic inequalities attached to gender. If progress on gender budgeting in NI is to happen, it needs to be accompanied by a fundamental shift in the positioning and treatment of gender within policy making.

#### Signs of Change in the Draft Outcomes Framework Consultation 2021

Although they fall outside the scope of this case study, it is important to provide some comment on the documents published in early 2021 when an attempt was made to produce a new PfG framework. The relevance of these documents to this working paper is primarily that there are clear signs of progress in the approach to equality screening and impact assessment. Comparing the 2021 screening questionnaire (TEO, 2021b) with the one produced in 2016 (TEO, 2016c), it appears to be based on a very different understanding of pre-existing inequality. Where before equality impacts were deemed not applicable, now they are recorded as 'major' due to the potential for improving outcomes for disadvantaged groups. The narrative claims that the PfG 'will present an opportunity to better promote equality of opportunity for all of the S75 equality categories' (TEO, 2021b:12). This is further explicated



in the EQIA, which states 'In aspiring to achieve the aim of "wellbeing for all" it is important to recognise that not all citizens are starting from the same position - that inequalities exist and persist' (TEO, 2021c:26). The draft outcomes framework consultation document contains references to the 'Gender Strategy' within lists of subsidiary social policies that are likely to help deliver the outcomes in an equitable way, reflecting the commitments to social inclusion in the New Decade New Approach agreement (TEO, 2021d).

These visible signs of progress in the PfG design are welcome indicators that feedback regarding the crucial role of a PfG in tackling inequality have been taken on board. However, there remains a concerning assumption that an OBA approach to policy making requires gender neutrality at the whole population level, subordinating this cross-cutting driver of inequality in our society to the level of performance accountability, where women are dealt with as a client population to be monitored (Orme, 2021). There also appears to be an over-reliance on subsidiary departmental strategies to deliver high level policy aims, especially considering that the last Gender Equality Strategy expired in 2016 and the process of developing a new one is significantly behind schedule. The extent to which the problems identified in this working paper will be rectified in the next PfG process remains to be seen. A full programme of strategic plans with appropriate actions and indicators reflecting the different social and economic realities facing women and men will be required in order to give meaning to the promising commitments to equality.

### **Policy Recommendations**

- Increase competence and capacity for equalities analysis through comprehensive mandatory training for civil servants involved in the development, implementation and review of policy and resource allocation. Equip civil servants with the ability to understand and differentiate between formal and substantive equality.
- Introduce a programme of comprehensive mandatory training on gender and associated structural inequalities for civil servants involved in the development, implementation and review of policy, to increase their capacity for gender equality analysis at a conceptual and operational level.
- Recognising the complexity of equalities analysis in its political and legal context, and the statutory obligations arising from Section 75, screening and equality impact assessments (EQIAs) for all policy areas should be completed at an appropriate level within the Senior Civil Service.
- Ensure that macro-level policy, such as the PfG, is aligned with domestic and international human rights duties on gender equality and that these duties are reflected in the relevant outcomes and indicators.



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The Ulster University Research Team gratefully acknowledge the generous funding received from the Joseph Rowntree Charitable Trust (JRCT) to support this research project.



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