



NI WOMEN'S BUDGET GROUP

NORTHERN IRELAND WOMEN'S BUDGET GROUP (NIWBG) RESPONSE TO THE CHANGES TO THE DISCRETIONARY SUPPORT SCHEME DRAFT EQIA

Department for Communities (DfC)

Prepared by Alexandra Brennan (Coordinator) of NIWBG

August 2023

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 in regard to the Department's EQIA.

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@niwbq.org).

Introduction

The NIWBG welcomes the opportunity to respond and provide relevant expertise in relation to the EQIA prepared by the Department. EQIAs are an opportunity to properly assess “...that all possible steps are taken to protect the most vulnerable in our society and to ensure that the impact on them is a key consideration where cuts in services are being considered.”¹ We firmly believe, as stated throughout this response, that gender budgeting is the best set of tools to help in ensuring that “the most vulnerable in our society” are protected from the financial constraints put on each department. We also emphasise the importance of embedding equality considerations and gender analysis at all levels of the policy-making process, so that this essential Scheme can continue to provide the necessary support. We need ambitious and creative decision-making to ensure that those most marginalised in society do not face a degradation of equality, but rather a promotion of equality.

The Budgetary Process and Gender Budgeting

It is important to acknowledge that the current budget process is particularly abnormal, and we understand that the budget allocations delivered by the Secretary of State are not only highly restrictive but put undue pressure on officials to make decisions they should not have to make. The abnormality of this budget cycle also means that planning procedures that occur during a typical budget process have not taken place. Without the fulfilment of these procedures, the equality screening and impact assessment consultation comes too late in the process and is inadequate for full consideration of the impact of these spending decisions on women.

Gender budgeting requires government departments to analyse the different impact of the budget on people of different genders, starting as early in the budget cycle as possible. The aim of gender budgeting is to ensure that the distribution of resources creates more gender equal outcomes. Over time, gender analysis should become embedded at all stages of the budget process. Women’s intersecting identities are also included in this analysis and policy-makers are expected to promote these areas of equality as well. There is widespread political support for gender budgeting in Northern Ireland and a growing evidence base that it can help create a more equal society. In the current budget crisis women will experience particular disadvantages due to the pre-existing socio-economic conditions. For example, there is strong evidence that women have suffered disproportionately from over a decade of Westminster austerity measures, the pandemic, and the cost-of-living crisis². We cannot afford to continue making decisions at the expense of women and risk further degradations to gender equality and additional intersecting equalities as well.

Not only is there an immediate need for gender budgeting in our current crisis, but the benefits would help to improve the budgetary process. Gender budgeting is good budgeting;

¹ Equality Commission for Northern Ireland (ECNI) (2014). Budgets and Section 75: a short guide ([Section 75 and Budgets short guide.pdf \(equalityni.org\)](https://www.equalityni.org/Section_75_and_Budgets_short_guide.pdf))

² MacDonald, E.M. (2018) The gendered impact of austerity: Cuts are widening the poverty gap between women and men. British Politics and Policy at LSE. <https://blogs.lse.ac.uk/politicsandpolicy/gendered-impacts-of-austerity-cuts/>
Charlton, E. (2023) This is Why Women are Bearing the Brunt of the Cost of Living Crisis According to Research. World Economic Forum. <https://www.weforum.org/agenda/2023/01/cost-of-living-crisis-women-gender-gap/>

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 place at the very end of the budget planning process or after the budget has been finalised. The OECD³ highlights that best practice for gender budgeting is to embed it at all levels of policy- and budget-making: planning, formulation, approval, implementation, monitoring and reformulation. It is crucial that gender equality obligations are not a 'tick-box exercise,' but rather that gender equality is mainstreamed in every area of the budgetary process through gender analysis of data supported by experts from civil society.

Please see [Annex 1](#) for more on gender budgeting.

Equality Obligations

Including equality considerations in the budgets and policy-making process requires gender disaggregated data, departmental-specific and high-level equality objectives and monitoring structures. The lack of gender-disaggregated data hinders our ability to effectively advocate on behalf of women and leaves decision-makers with data that presents a false narrative – one where the diversity of experiences between women and men is unaccounted for and therefore absent in crucial policy and budgetary decisions.

We recommend that where gender-disaggregated data is available, it must be used to inform the decision-making process. Where there is no gender-disaggregated data, the Department needs to request that it is recorded. Having this information is key to completing the equality analysis required by Section 75. Without it, equality assessments do not capture the realities of existing inequalities and they lack the robust evidence needed to influence policy and budgets.

³ OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

This assessment is required at the earliest opportunity in the policy-making process and as further decisions are made in finalising the policy, not only to inform Level 5 decision-makers about their policy's effects on equality, but to ensure the policy is both clear and transparent regarding the assessment of predicted impacts. It is essential that sufficient consideration of gender inequality, paired with robust evidence, is reflected in this document to secure equality outcomes.

Impact of Cuts to the Discretionary Support Scheme

The gendered impacts of reducing and/or making changes to the Discretionary Support Scheme are significant, as demonstrated by the amount of women who were awarded grants - about 67% compared to about 33% of men. This is supported by past data that has demonstrated that women are more likely to access social security than men⁴. Therefore, the higher uptake of social security amongst women will lead to a higher uptake of discretionary support provided to women. The Independent Review of Discretionary Support, led by the Department, found that the money provided through the Discretionary Support Scheme was considered lifesaving to those that availed of it⁵. With higher rates of food bank usage⁶, women struggling to pay for essentials like food and energy bills⁷, and higher rates of poor mental and physical health⁸, the proposed cuts will have a devastating impact on women.

While the gendered impact of this decision was clear in the data provided in the Departmental EQIA, this is the only data that the Department is using to measure the impact this decision will have on protected groups. While outlining who has been awarded Discretionary Support is vital to understanding potential impacts, there has been no analysis - or no public analysis - of how these specific groups use the discretionary support, or how compounding inequalities may result in more severe impacts. This information is crucial to this decision yet is absent from the EQIA. The data alone shows who has utilised this support in the past, but it does not show the nature of how this is being used. It does not demonstrate how it may impact other areas of a person's life, such as the need to access mental and physical healthcare as a result of increased deprivation.

For example, we know that women and people with disabilities are more likely to be economically inactive or underemployed. We also know, based on the data provided by the Department, that women and people with disabilities are more likely to be awarded discretionary support grants⁹. From this, the Department can measure the impact on an individual who is a woman or a person with a disability. However, this does not account for

⁴ UK Women's Budget Group. 2022. *Spring Budget 2022 Pre-Budget Briefings: Social security and gender*. (<https://wbg.org.uk/wp-content/uploads/2022/03/Social-security-and-gender-PBB-Spring-2022.pdf>)

⁵ DfC. February 2022. *Independent Review of Discretionary Support, Department for Communities*. (<https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-independent-review-of-discretionary-support-22.pdf>)

⁶ Trussell Trust. 2023. *Emergency food parcel distribution in Northern Ireland: April 2022 – March 2023*. (<https://www.trusselltrust.org/wp-content/uploads/sites/2/2023/04/EYS-Northern-Ireland-Factsheet-2022-23.pdf>)

⁷ Women's Regional Consortium. June 2023. *Women's Experiences of the Cost-of-Living Crisis in Northern Ireland*. (<https://www.womensregionalconsortiumni.org.uk/research/>)

⁸ Ibid.

⁹ DfC. July 2023. *Changes to the Discretionary Support Scheme: Draft Equality Impact Assessment*. (<https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-changes-to-the-discretionary-support-scheme-egia.pdf>)

the impact this will have on a woman with a disability who relies on social security and the assistance provided through the Discretionary Support Scheme. Similarly, the impact may be shown as not as severe for those whose racial make-up is not white, yet compounded with another equality group there may arise great impacts. Analysis is key to assessing how a policy will impact or promote equality, and that is precisely what is missing from this EQIA.

Additionally, the proposed alternatives to continuing the current rate of spend and running out of funds by the autumn do not actually mitigate the identified impacts. The purpose of an EQIA is to identify impacts, and mitigate those impacts, before a policy is enacted - not to identify the impacts and push ahead without proper mitigation. The NIWBG is aware of the constrained financial situation the Department and all departments find themselves in at this time. However, the inequalities and impacts exacerbated by the proposed decision - increased deprivation, further impacts on the mental health and wider healthcare crisis, reliance on illegal lending such as paramilitary lending and further impacts on the debt crisis - will be a much greater cost to Northern Ireland and the Treasury in the near future. Women and other protected groups will not be able to cope without this Scheme, and services will not be able to cope with the consequences of these impacts.

Conclusion

We reiterate the importance of gender budgeting tools like gender analysis and gender-disaggregated data collection in transforming the way in which decisions are made to promote gender equality, especially in the face of a budget crisis. We recommend that gender budgeting and gender analysis be incorporated into the Department's equality assessment process and that the Department builds capacity for gender and equality mainstreaming in the policy-making process. This would help provide the necessary analysis to demonstrate the full impact of the Department's proposed decisions, and highlight ways to mitigate these impacts. We would be pleased to meet with the Department to further discuss gender budgeting as a tool to address budgetary constraints and fulfil the Department's Section 75 requirements.

ANNEX 1



BRIEF ON GENDER BUDGETING

Budgetary processes and spend are far from 'neutral' – policies emanating from the Programme for Government and budgetary decisions have gendered consequences, whether they be intended or not. By taking a 'gender neutral' stance, decision-makers are oblivious to the complexities between the experiences of women and men and reinforce systemic disadvantages faced by women and other groups.

What is Gender Budgeting?

Gender budgeting is the tool that can help recognise systemic disadvantages and lead to budgets and policies that promote greater gender equality. If implemented, policy makers would consider the gendered impacts of spending and revenue raising decisions and how to use these mechanisms to bring about gender equality. Women's intersecting identities are also included in this analysis and policy makers are expected to promote these areas of equality as well.

In [Gender budgeting: Working paper 1](#), our partners Dr. Joan Ballantine, Dr. Michelle Rouse and Professor Ann Marie Gray highlight that, "*Northern Ireland lags significantly behind other devolved UK administrations and other OECD countries,*" where gender budgeting has "*made a significant contribution to addressing gender inequalities, the elimination of unequal outcomes and to increasing women's participation in civic and political life.*"¹⁰

It is important to note that gender budgeting is not about allocating more funds to women but about making sure the available resources have maximum impact. The [European Women's Lobby](#) breaks down the realities and misconceptions about gender budgeting as follows¹¹:

Gender budgeting is about:

- *Including a gender perspective into budget planning and analysing budgets taking into account their impact on women and men, girls and boys.*
- *Introducing a gender perspective into the entire budget, including seemingly "gender-neutral" budget lines.*
- *Reprioritising and refocusing of spending and restructuring of taxation with a view to promote equality.*

Gender budgeting is not about:

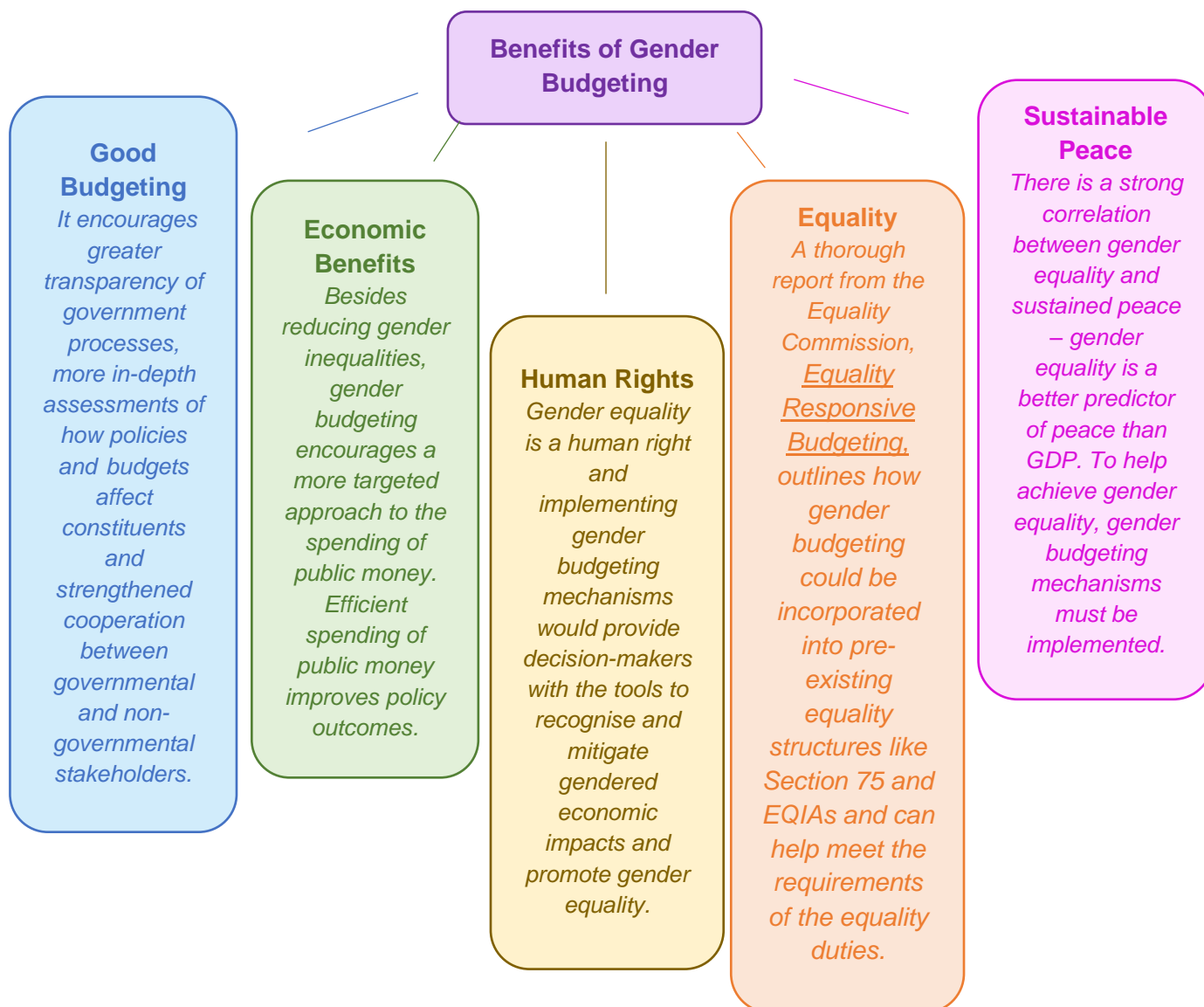
- *Creating separate budgets for women.*
- *Only looking at the parts of the budget which have a social content or that are explicitly gender-related.*
- *Demanding more spending.*

¹⁰ Ballantine, J., Rouse, M. and Gray, A.M. (2021). *Gender Budgeting: Working Paper 1: What does the literature tell us? Lessons for Northern Ireland (NI)*. ([Gender Budgeting-1.pdf](#))

¹¹ European Women's Lobby. *What is Gender Budgeting?* ([What Is Gender Budgeting.pdf](#))

Why implement Gender Budgeting?

Gender budgeting is transformative, enhances transparency and accountability, and is of value in delivering economic benefits¹², rights and equality¹³, and securing sustainable peace¹⁴.



¹² Himmelweit, S. (2002). 'Making visible the hidden economy: the case for gender-impact analysis of economic policy,' *Feminist Economics*. 8 (1), 49-70.

¹³ Quinn, S. (2013). *Equality responsive budgeting*. ([Equality Responsive Budgeting \(equalityni.org\)](http://equalityni.org))

¹⁴ Fernanda Espinosa, M. (2020). *Peace Is Synonymous With Women's Rights*. (<https://www.un.org/en/un-chronicle/peace-synonymous-women%E2%80%99s-rights>)