

The Final Equality & Impact Assessment Report on the Department of Education 2023-24 Resource Budget

Published 8 November 2023

If you require this document in an alternative format (such as in large print, in Braille, or paper) and/or language, please contact the Budgeting Team as follows:



E mail: debudgeteqia@education-ni.gov.uk

Contents

| | PAGE |
|--|------|
| 1 Introduction | 4 |
| 2 The Executive Summary | 7 |
| 3 The Aims of the Policy | 9 |
| 4 Consideration of available Data and Research | 15 |
| 5 Assessment of Impact | 21 |
| 6 Consideration of measures which might mitigate any adverse impact and alternative policies which might better achieve the promotion of equality of opportunity | 26 |
| 7 Formal Consultation on the actual impacts of existing policies and the likely impact of proposed policies | 30 |
| 8 Monitoring | 36 |

| | Abbreviations and terms used |
|---------|--|
| ACEs | Adverse Childhood Experiences |
| ALBs | Arm's Length Bodies |
| ASB | Aggregated Schools' Budget |
| ASR | Asylum Seeker Refugee |
| CFF | Common Funding Formula |
| CAMHS | Child and Adolescent Mental Health |
| CnaG | Comhairle na Gaelscolaíochta |
| CSCA | Children's Service Co-Operation Act |
| DE | Department of Education |
| DfE | Department for the Economy |
| DoF | Department of Finance |
| DoH | Department of Health |
| EA | Education Authority |
| EHWB | Emotional Health and Wellbeing |
| EQIA | Equality Impact Assessment |
| ETI | Education and Training Inspectorate |
| FSM | Free School Meals |
| GRtL | Getting Ready to Learn |
| GTCNI | General Teaching Council for Northern Ireland |
| ITE | Initial Teacher Education |
| KS | Key Stage |
| MCA | Middletown Centre for Autism |
| NGO's | Non-Governmental Organisations |
| NICIE | Northern Ireland Council for Integrated Education |
| NICS | Northern Ireland Civil Service |
| NISRA | Northern Ireland Statistics and Research Agency |
| PHA | Public Health Agency |
| SEN | Special Educational Needs |
| SEND | Special Educational Needs and Disability |
| SENCO's | Special Educational Needs Coordinators |
| TEO | The Executive Office |
| TPO | Third-Party Organisations |
| TSN | Targeting Social Need |
| UK | United Kingdom |
| UNCRC | United Nations Convention on the Rights of the Child |
| VCSE | Voluntary and Youth Sector |
| YCNI | Youth Council for Northern Ireland |

1. INTRODUCTION

- 1.1. The Department of Education (DE) is responsible for the central administration of all aspects of education and related services in Northern Ireland - excepting the higher and further education sector, responsibility for which is within the remit of the Department for the Economy (DfE).
- 1.2. The Department's main areas of responsibility are in pre-school, primary, post-primary and special education; the youth service; the promotion of community relations within and between schools; and teacher education and salaries. Its primary statutory duty is to promote the education of the people of Northern Ireland and to ensure the effective implementation of education policy. Its key functions include:
 - advising Ministers on the determination of education policy;
 - framing legislation;
 - accounting for the effectiveness of the education system;
 - allocating, monitoring and accounting for resources; and
 - through the Education and Training Inspectorate (ETI), evaluating and reporting on the quality of teaching and learning and teacher education.
- 1.3. The Department also aims to ensure that children, through participation at schools, reach the highest possible standards of educational achievement. In pre-school settings, schools and through the Youth Service, the Department also promotes personal well-being and social development, so that children gain the knowledge, skills and experience to reach their full potential as valued individuals.
- 1.4. DE is supported in delivering its functions by a range of Arm's Length Bodies (ALBs) (set out below), each of which is accountable to the Department. The performance of these bodies directly influences the ability of the Department to achieve its objectives
 - **Comhairle na Gaelscolaíochta (CnAG)** - responsibility includes to encourage and promote the strategic development of, and provide guidance and advice to, the Irish-medium sector.
 - **Council for Catholic Maintained Schools (CCMS)** - responsible for the employment of teachers in Catholic maintained schools, effective planning and management of these schools and for a number of other, mainly advisory, functions. It is 100% funded by the Department.
 - **Education Authority (EA)** - responsible for securing adequate provision for pre-school, primary and secondary education; and for recreational, social, physical, cultural and youth service activities for grant-aided schools and other grant-aided educational establishments. The EA acts as the employing authority for all staff in controlled schools (schools under EA management) and for all non-teaching staff in Catholic maintained schools. It is responsible for supporting the development of governors, principals, teachers and other school-based staff and has duties to provide training, advice and support for schools to bring about improvement. The EA is accountable for the funding provided directly to it, and for the funding delegated to controlled schools and Catholic maintained (and other maintained) schools. The EA is also the statutory funding authority for

grant maintained integrated and voluntary grammar schools. The EA is therefore responsible for ensuring schools achieve good outcomes for their pupils in return for the money invested.

- **General Teaching Council for Northern Ireland¹ (GTCNI)** – the statutory body for the teaching profession and is dedicated to enhancing the status of teaching and promoting the highest standards of professional conduct and practice.
 - **Middletown Centre for Autism (MCA)** - delivers key educational services on an all-island basis for children with some of the most complex forms of autism. It is a joint initiative between DE and the Irish Department of Education & Skills (DES), with funding provided on a 50/50 basis. The MCA delivers intensive assessment and learning support to children on an outreach basis in the home and school. It also offers a broad range of training courses for educational professionals and parents, including a Whole School Approach in NI and a programme of research.
 - **Northern Ireland Council for Integrated Education (NICIE)** - encourages and facilitates the development of integrated education.
 - **Northern Ireland Council for the Curriculum, Examinations and Assessment (CCEA)** - responsible for keeping under review all aspects of the curriculum, examinations and assessment for grant aided schools and colleges of further education and to undertake statutory consultation on proposals relating to legislation. It also advises DE on matters concerned with the curriculum, assessment, examinations, and external qualifications; accrediting and approving qualifications; conducting and moderating examinations and assessments; and ensuring that standards are recognised as equivalent to standards of examinations and assessments conducted by other bodies or authorities exercising similar functions in the United Kingdom (UK). It publishes and disseminates information relating to the curriculum, assessment and examinations, developing and producing teaching support materials for use in schools and carrying out research and development.
 - **Youth Council for Northern Ireland² (YCNi)** - following the creation of the EA as a regional body, responsibility for regional youth services' funding and support transferred from the YCNi to the EA on 1 April 2016, with funding for regional organisations earmarked.
- 1.5. Under the statutory duties contained within Section 75 of the Northern Ireland Act 1998, DE decided to carry out an Equality Impact Assessment (EQIA) on its proposed 2023-24 Resource Budget as screening had indicated that there may be significant implications in relation to one or more of the nine Section 75 categories.
- 1.6. While this is the Final EQIA report on the 2023-24 Resource Budget, the Department will continue to welcome any comments you may have in terms of this EQIA and our recommendations with regard to measures to mitigate adverse impact or alternative policies.

¹ Council stood down 13 December 2021

² Currently non-operational and subject to Minister's decision on future

1.7. We will consider all relevant comments received as part of our ongoing monitoring.

1.8. Further copies of this Final EQIA Report are available on our website at

www.education-ni.gov.uk

1.9. If you have any queries about this document, and its availability in alternative formats please contact:

E-mail: debudgeteqia@education-ni.gov.uk

Or

Write to: **Budgeting Team**
Department of Education
Room S11
Rathgael House
43 Balloo Road
Rathgill
BANGOR
BT19 7PR

2. EXECUTIVE SUMMARY OF THE CONSULTATION REPORT

- 2.1 The Department of Education Budget 2023-24 consultation is published at a time when Executive Departments are collectively facing the most challenging budget in recent history, with pressures of over half a billion pounds (excluding potential non-contractual pay awards) in 2023-24.
- 2.2 In this context, the Department of Education, its ALBs and Third-Party Organisations (TPO) face unprecedented funding challenges and cuts in 2023-24. This is being delivered against a backdrop of political uncertainty, high inflation, ongoing Industrial Action and during a Cost-of-Living crisis.
- 2.3 To inform Budget allocations for the 2023-24 financial year, a number of budget information gathering exercises were commissioned by the Department of Finance (DoF) and the Northern Ireland Office over the course of the last few months, in order to provide background information and evidence to enable a 2023-24 Budget to be set by the Secretary of State for Northern Ireland.
- 2.4 Through these exercises, the Department identified a Resource requirement of £2,939.9m.
- 2.5 Despite the scale of the pressures faced, and in anticipation of reduced budget allocations, the Department's ALBs and TPOs were provided with indicative opening allocations, subject to final budget confirmation, for 2023-24. A number of allocations covered the initial 3 months of 2023-24. This was to allow services to be maintained, albeit on a constrained basis, until a budget was set.
- 2.6 The Secretary of State made a Written Ministerial Statement to Parliament on 27 April 2023³, setting the 2023-24 Budget for Northern Ireland. While some flexibility has been granted by Treasury on the repayment of the £297m 2022-23 Budget overspend, providing some protection to front line public services in Northern Ireland, very difficult decisions remain in order to live within the funding available for 2023-24.
- 2.7 For the Department, the 2023-24 Budget allocations result in a Resource funding gap of c£300m (equivalent to 11.6% of the final budget allocation) required for 2023-24. Managing Resource shortfalls of this magnitude will undoubtedly have a significant and adverse impact on the Department's ability to deliver Educational services in 2023-24.
- 2.8 The purpose of the EQIA is to present the decisions required by the Department to live within its 2023-24 Budget allocation and the potential impact to people in Section 75 categories of those decisions on the services and supports the Department provides.

³ [NI Finances - Statement made on 27 April 2023](#)

- 2.9 In the absence of an Executive and a Minister, some of the decisions required to live within the 2023-24 Budget allocation have been taken by the Department's Permanent Secretary under the Northern Ireland (Interim Arrangements) Bill which was introduced to the House of Commons on 27 April 2023, and following agreement by both Houses on the text of the bill received Royal Assent on 24 May. The Northern Ireland Budget (No. 2) Act 2023 received Royal Assent on 18 September 2023.
- 2.10 Significant decisions already taken by the Department's Permanent Secretary include reductions in the EA's Aggregated Schools Budget (ASB) and Block Grant and the cessation of the Engage, Healthy Happy Minds and School Holiday Food Grant schemes from the end of March 2023.
- 2.11 The Department would like to take this opportunity to thank all those who participated in the consultation. The invaluable input and expertise received through responses will help to inform and shape further mitigation measures and the reallocation of any additional funding available during 2023-24.

3. THE AIMS OF THE DE POLICY

Resource Budget 2023-24

- 3.1 The 2023-24 Final Budget allocation for Education was announced by the Secretary of State in a Written Ministerial Statement on 27 April 2023. The Budget provided the Department with a Resource allocation of £2,576.508m for the 2023-24 financial year.
- 3.2 The budget set by the Secretary of State is presented at an overall Departmental outcome level. Therefore, it is for each Department to allocate its budget across its spending areas. In the absence of a Minister, each Permanent Secretary will make budget decisions which are within their power to make under the Northern Ireland (Executive Formation Etc.) Act 2022.
- 3.3 Departments are required to screen proposed budget decisions in line with Equality Commission Northern Ireland guidance and, should an EQIA be required, this will be published to support the consultation process.
- 3.4 The purpose of this paper is to set out the Department's assessment of the equality impacts of the 2023-24 Resource Budget on educational services.

Resource Budget 2023-24 Outcome

- 3.5 Prior to the budgetary outcome for 2023-24 being announced, all indications were that the NI Block would face considerable financial pressures this year and beyond, and that DE would be given an extremely challenging budget outcome for 2023-24.
- 3.6 It was acknowledged that there was an urgent need to provide clarity over the financial resources available to schools, the EA, other ALBs and relevant TPO's to enable them to plan from 1 April 2023.
- 3.7 In view of the available budget, decisions could not be delayed until the full completion of an EQIA. In addition, the financial constraints are at a level that will significantly inhibit the Department's ability to reinstate funding, even where impacts are substantial. However, the EQIA will enable the Department to better assess the impacts of the budget; and provide valuable insight to inform future decisions should additional funding become available in future.
- 3.8 Despite the scale of pressures faced, and in anticipation of reduced budget allocations, the Department's ALBs and TPOs were provided with indicative opening allocations, subject to final budget confirmation, for 2023-24. A number of allocations covered the initial 3 months of 2023-24. This was to allow services to be maintained, albeit on a constrained basis, until a budget was set.
- 3.9 The 2023-24 Final Budget settlement, as set out in the Written Ministerial Statement of 27 April 2023, provided DE with an initial Resource budget of £2,576.508m. Table 1 compares this position with the 2022-23 closing position.

Table 1

| | 2023-24 Opening £m | 2022-23 Closing £m | Variance between 2022-23 and 2023-24 £m | Variance between 2022-23 and 2023-24 % |
|-------------------------|-----------------------------------|-----------------------------------|--|---|
| Resource DEL | 2,576.508 | 2,647.854 ⁴ | (71.35) | (2.69) |

- 3.10 The Department's Resource budget increased by £3.615m to £2,580.123m following the Summer Technical exercise in September 2023. The additional funding included £2.634m for Tackling Paramilitary Activity, £0.45m for Bright Start funding, £0.302m in relation School Holiday Food Grant funding returned by DfE, £0.2m for Operation Encompass, and £0.029m of sundry transfers.
- 3.11 Based on this budget allocation, there remains an estimated funding gap of c£300m. Managing a Resource shortfall of this scale will undoubtedly have a significant and adverse impact on the Department's ability to deliver educational services in 2023-24.
- 3.12 In managing this position, the Department has firstly considered its ability to deliver internal efficiencies, prior to the need to reduce or stop service delivery or any reduction to its ALB and TPO funded organisations, including the Voluntary and Community sector (VCSE).
- 3.13 In light of the extremely challenging financial position, the Department has already taken decisions to reduce expenditure, including:
- significant Departmental staff vacancy control;
 - reducing expenditure on day to day administrative costs;
 - reducing funding to the Department's ALBs;
 - reducing discretionary expenditure; and
 - reductions to the ASB and EA Block Grant (further detail of which is provided below).

Departmental Staff and Administrative Costs

- 3.14 DE has Staff and Administrative costs of c£36m, or 1.4% of the total budget.
- 3.15 The Department is currently undertaking several mitigating actions to help restrict expenditure. The Department has reviewed its resources and has suppressed 40 approved vacancies and paused the approval of an additional 37 vacancies.
- 3.16 Efforts have also been made to limit General Administrative Expenditure including hospitality and travel.

⁴ Following a Post Budget exercise in respect of Technical Transfers, DE's Resource Budget increased from the original allocation of £2,642.892 per the SOS's Written Ministerial Statement of 24 November 2022.

Departmental ALBs

3.17 The Department's ALBs will also be required to contract spending to live within their budget allocations.

Discretionary Spend

3.18 In an effort to protect statutory front line service delivery, all expenditure identified as discretionary has been reviewed, and funding has either ceased or reduced in the majority of these areas⁵.

3.19 Engage, Healthy Happy Minds, the School Holiday Food Grant scheme and some smaller programmes ceased from 31 March 2023.

3.20 A Fair Start – while the Expert Panel recommended funding of £21m, only £2.5m could be allocated, and the Special Educational Needs and Disability (SEND) Transformation Programme saw a £1.9m (50%) reduction to its funding.

3.21 TPOs supporting curriculum delivery were given a reduced allocation to cover April and May based on the indicative budget and were advised that further funding would be unlikely beyond May unless additional funding became available as part of the 2023-24 Final Budget (Table 2 refers). The decision was subsequently made to cease funding after 31 May.

Table 2

| | 2022-23 £000 | 2023-24 £000 |
|--|-------------------------|-------------------------|
| Young Enterprise Northern Ireland | 550 | 96 |
| Sentinus | 300 | 54 |
| An Gaelaras | 73 | 13 |
| BDUSDA | 89 | 16 |
| Work Inspiration Programme | 100 | 18 |
| Confucius | 85 | 15 |
| Sports Programme | 500 | 90 |
| Music for Youth | 12 | 2 |
| Northern Ireland Centre for Information on Language Teaching | 75 | 13 |
| School Employer Connections | 110 | 20 |

⁵ [Equality and Human Rights Policy Screening for Discontinuation of the Engage III programme at the end of the 2022/23 financial year](#)
[Equality and Human Rights Policy Screening Discontinuation Healthy Happy Minds Pilot Counselling and Therapeutic Support Programme](#)
[Equality and Human Rights policy screening for discontinuation of School Holiday Food Grant \(SHFG\) payment scheme at the end of 2022/23 financial year](#)
[Equality and Human Rights Policy Screening for Cessation of the North Belfast Primary Principals Support Programme](#)
[Equality and Human Rights Policy Screening for Nurture Provision - Budget reduction guidance](#)

- 3.22 In addition, as part of the interim resource allocations, the Pathway Fund, Extended Schools, Bright Start and Toybox were allocated amounts to cover the period 1 April 2023 to 30 June 2023 on the basis that the programmes would have to cease at the end of June 2023 if additional funding was not made available in the Final Budget. Sure Start was also provided with funding for the same period. Core funding for the Early Years sector was reduced by £53k to £212k.
- 3.23 Having carefully considered all of the principles in the Secretary of State's decision-making guidance, the Permanent Secretary decided not to cut funding to Youth services and a range of Early Years programmes, including the Pathway Fund, Sure Start, Bright Start and Toybox, or to proceed with the full scale of proposed cuts to Extended Schools.
- 3.24 Having considered the scale and cumulative impact of the proposed cuts, which represent a major change to long standing Ministerial programmes and policies, it is the Permanent Secretary's view that such a decision should be taken by a Minister, not a Permanent Secretary. Evidence shows that the scale of the proposed cuts to these programmes would create greater budgetary pressures for the next financial year and beyond across a range of areas, including special educational needs (SEN). Furthermore, the reductions would cause significant detriment to the provision of services for our most vulnerable children, young people and families, and run counter to all the Department's efforts to tackle educational disadvantage.

ASB

- 3.25 To protect the 2023-24 ASB as far as possible, priority was given to maintaining the Age Weighted Pupil Unit (AWPU) cash value at 2022-23 levels. However, it was not possible to build into this year's baseline, the 2022-23 funding to mitigate pay and energy increases faced by schools. This resulted in a 1.8% reduction when compared to the closing budget allocation at 2022-23 Final Outturn.
- 3.26 Since the initial budget allocation an additional £21.8m, funding has been provided to the ASB Budget towards contractual pay awards, resulting in a lower reduction in funding compared to the closing budget allocation at 2022-23 Final Outturn, to 0.25%.

EA Block Grant (SEN)

- 3.27 The opening 2023-24 SEN Block Grant allocation to the EA for SEN represented a roll forward of the 2022-23 Final Budget. Additional late allocations to the EA Block Grant (from which the EA allocated an additional £12.5m to SEN budget lines to deliver a balanced budget at Final Outturn) resulted in the opening 2023-24 allocation for SEN representing a 2.8% reduction compared to the allocation in the EA's closing budget at 2022-23 Final Outturn.

- 3.28 Since the initial budget allocation, an additional £2.6m funding has been provided to the EA SEN Block Grant towards contractual pay awards. This brings the reduction in funding compared to the closing budget allocation at 2022-23 Final Outturn to 2.2%.
- 3.29 The EA has a statutory obligation to provide appropriate, tailored support to children and young people once they receive a statement of SEN, and demand for these services is rising steadily, with SEN expenditure now accounting for more than 50% of the EA's overall Block Grant. Whilst provision of SEN is a statutory requirement which must be met, there is uncertainty over the precise level of increased demand. This will be monitored in-year.

EA Block Grant (Other)

- 3.30 The opening 2023-24 Block Grant allocation to the EA represented a roll forward of the 2022-23 Final Budget. Additional late allocations in 2022-23 to the EA Block Grant resulted in a reduction in the opening 2023-24 allocation of 14.3% compared to the EA's closing budget at 2022-23 Final Outturn.
- 3.31 Since the initial EA budget allocation, an additional £1.1m funding has been provided the EA Non-SEN Block Grant towards contractual pay awards. This brings the reduction in funding compared to the closing budget allocation at 2022-23 Final Outturn to 14.1%.

Summary

- 3.32 The 2023-24 Resource Budget summary compared to the 2022-23 closing Resource Budget is shown in Table 3 below.

Table 3

| | 2022- 23 Identified Need | 2023-24 Current Funding⁶ |
|----------------------------|---------------------------------|--|
| | £m | £m |
| ASB | 1,484.274 | 1,411.060 |
| EA Block Grant – SEN | 506.841 | 440.489 |
| EA Block Grant – Other | 433.285 | 395.311 |
| Earmarked Funds | 181.448 | 89.457 |
| Other Education Services | 9.812 | 7.857 |
| Early Years | 36.901 | 34.743 |
| Youth | 37.339 | 40.117 |
| ALBs | 28.705 | 26.847 |
| DE | 40.646 | 36.505 |
| Estimated Pay Requirements | 180.655 | - |
| Contingency | - | 97.737 |
| TOTAL | 2,939.906 | 2,580.123 |

⁶ Figures correct as at 26 October 2023

- 3.33 Whilst the Department and its associated Bodies will do their utmost to implement decisions and live within the allocated budget, it is important to highlight that some pressures will definitely materialise in 2023-24 as they are completely unavoidable or unstoppable, including demand-led SEN, contractual pay progression and pay awards.
- 3.34 The Department is therefore holding some contingency funding until there is further clarity on these inescapable pressures. So far in 2023-24, the Department has already allocated an additional £25.5m from this contingency funding in respect of contractual teaching pay.

4. CONSIDERATION OF AVAILABLE DATA AND RESEARCH

- 4.1. In assessing the impact of the 2023-24 Resource Budget policy against the obligation under Section 75 of the 1998 Act, the Department concludes that there is evidence of some differential impact in respect of some Section 75 categories.
- 4.2. Impacts have been considered against the backdrop of available data.

Religious Belief

- 4.3. Statistics from the 2022-23 annual school census exercise (published March 2023) showing the breakdown of school population by religion ([School Annual Enrolments 2022/23](#)).
- 4.4. “Protestants continue to have lower levels of attainment than Catholics at GCSE (including English and Maths) and A Level.” ([Key Inequalities in Education and Communities](#)).
- 4.5. The Equality Commission in their Summary of policy positions relating to poverty and socio-economic disadvantage state that: “...a trend of underachievement and lack of progression persists for those entitled to free school meals (FSME), particularly boys, notably Protestant boys”.
- 4.6. 47.9% of Protestant FSME boys (465 boys) achieved at least five GCSEs at grades A*-C or equivalent, including GCSE English and Maths in 2020-21. This was lower than both the equivalent figure for Catholic FSME boys, of which 58.3% (895 boys) achieved this GCSE benchmark, and “Other” FSME boys, of which 49.3% (177 boys) achieved this benchmark.
- 4.7. Protestant FSME girls are also less likely to achieve the benchmark of at least five GCSEs at grades A*-C or equivalent including GCSE English and Maths with 59.9% (516 girls) achieving this benchmark compared with 70.8% Catholic FSME girls (1042 girls) and 64.1% “Other” FSME girls (221 girls).

Political Opinion

- 4.8. The political opinion of pupils and young children is not known as it is not collected, although religion is often used as a proxy for political opinion.

Racial Group

- 4.9. Statistics from the 2022-23 annual school census (published in March 2023) showing the breakdown of school population by ethnicity are included at [Annex A](#).

- 4.10. Schools are becoming increasingly more ethnically diverse. Nearly 21,800 pupils in schools in Northern Ireland are recorded as “non-white”, which represents 6.1% of the school population. [School Annual Enrolments 2022/23](#)
- 4.11. The report also concluded that there has been an increase in the number and proportion of newcomer pupils in schools in Northern Ireland. A newcomer pupil is one who has enrolled in a school but who does not have the satisfactory language skills to participate fully in the school curriculum. In 2022-23, there were nearly 19,500 newcomer pupils accounting for 5.5% of the school population. [School Annual Enrolments 2022/23](#)
- 4.12. “Children from the Traveller community and Roma children have some of the lowest levels of attainment of all equality groups.”([Key Inequalities in Education and Communities](#))
- 4.13. In 2019 a significantly higher proportion of respondents reported they had witnessed racist bullying or harassment in their school than in the baseline year (2014: 39%; 2019: 45%). [Racial Equality Indicator Report 2014-2019 \(executiveoffice-ni.gov.uk\)](#)
- 4.14. Alongside the Public Health Agency (PHA), DE commissioned the National Children’s Bureau to undertake a scoping report to help inform the development of an emotional health and wellbeing (EHWB) framework for children and young people in Northern Ireland. One of the key findings relating to ethnic minority groups was that children and young people who are members of minority groups are at a higher risk of developing emotional wellbeing difficulties. In a study of 14 Northern Ireland schools with high numbers of newcomer children, Barnardo’s (2015) found that newcomer children may become frustrated in class due to language barriers, struggle to fit in, and are more likely to experience bullying. [National Children's Bureau - Informing the Development of an Emotional Health and Wellbeing Framework](#)

Age

- 4.15. Data gathered as part of the 2022-23 annual school census exercise (published in March 2023) shows that there are:
- 22,715 pupils in funded pre-school education (pre-compulsory school age);
 - 171,199 pupils in primary schools and preparatory departments (Year 1-7);
 - 154,312 pupils in post-primary schools (Years 8 -14); and
 - 6,651 pupils in special schools (ages 4 – 19).
- 4.16. The number of pupils in all funded schools has increased for the thirteenth successive year. [Annual Enrolments at Grant Aided Schools in Northern Ireland 2022/23.](#)
- 4.17. Research by the Office for National Statistics (ONS) (2019) shows that low educational attainment and age, amongst other factors, can be barriers to accessing adult education or training. A separate study by the ONS in 2014 entitled “Intergenerational transmission of disadvantage in the UK & EU” demonstrated that educational attainment is the most important predictor of a person’s chances of future poverty: *“It is well established that higher levels of educational attainment are associated with better employment prospects and higher earnings, and therefore a*

reduced risk of poverty. An adult with poor qualifications is more likely to be in poverty than one that is highly educated”.

4.18. [Young Life and Times Survey 2022](#) highlighted the impact COVID-19 has had on Young People in Northern Ireland. The survey asked respondents:

Overall, do I feel my education has been negatively affected by Coronavirus?

- Strongly agree 53%
- Agree 33%
- Neither agree nor disagree 9%
- Disagree 4%
- Strongly disagree 1%

Marital Status

4.19. In 2021 there were 7,921 marriages in Northern Ireland. Of those marriages in the age band 16-19, there were 56 males and 74 females. In the same period, there were 396 same sex marriages; in the under 25 age band there were 6. [Registrar General Annual Report 2021](#).

4.20. In 2019, 9.4% of dependent children lived in cohabiting couple families. (Source: ONS Statistical bulletin: Families and Households).

Sexual Orientation

4.21. The table and statistics below are an extract from a document entitled “Post-primary school experiences of 16-21 year old people who are Lesbian, Gay, Bisexual and/or Transgender” (LGBT) on the DE website – this can be accessed at: [Post-Primary School Experiences of 16-21 year old people who are Lesbian, gay, Bisexual and/or Transgender \(LGBT\)](#)

| | | |
|---|--|--------------------------------------|
| <i>Attendance</i> | 21.9% (n=102, base=465) of respondents | 41.5% (n=27, base=65) of respondents |
| <i>Educational achievement</i> | 19.4% (n=90, base=463) of respondents | 38.5% (n=25, base=65) of respondents |
| Proportion of respondents who said the impact of their experiences as an LGB&T student had a negative impact on... | LGB (n=467) | Transgender (n=65)*** |
| <i>Emotional wellbeing inside and outside of school</i> | 61.3% (n=285, base=465) of respondents | 73.8% (n=48, base=65) of respondents |

4.22. The report looked at the main forms of bullying children had experienced because of their sexual orientation or gender identity as follows.

- Called names relating to sexual orientation or gender identity 89.9%.
 - Other pupils told lies or spread false rumours 70.0%.
 - Left out of things on purpose by other pupils or ignored 56.4%.
 - Hit, kicked, pushed, or shoved around 28%.
- 4.23. In the [Cara Friend](#) report, young people were asked about their experiences of LGBT specific youth groups. Opportunities afforded by LGBT Youth Groups included the following.
- A safe space in a non-judgemental environment 83 (78%).
 - Allow young people you to explore sexual orientation and gender identity in a safe way 63 (59%).
 - A sense of identity and belonging 74 (70%).
 - A feeling of support 82 (77%).
 - An opportunity to socialise in an alcohol-free environment 62 (59%).
 - Make LGBT news and information accessible 64 (60%).
 - Create opportunities for collective action/lobbying 50 (47%).

Men And Women Generally

- 4.24. Information drawn from the 2022-23 annual school census exercise (published in March 2023) shows that there is a fairly even distribution of males and females within the school population, with 50.8% male pupils and 49.2% female.
- 4.25. Males continue to have lower levels of attainment than females, beginning in primary school and continuing throughout schooling to GCSE and A Level". ([Key Inequalities in Education and Communities](#)).
- 4.26. The [Chief Inspector's Report 2016-2018](#) noted that girls continued to outperform boys over the reporting period, at GCSE level in particular.
- 4.27. In 2016-2017, female school leavers continued to perform better than their male counterparts, with 88.1% of female pupils achieving at least five GCSEs at grades A*-C, including equivalents, compared with 79.7% of male school leavers, a gap of 8.4 percentage points.
- 4.28. When GCSE English and GCSE Mathematics are included in the five or more GCSEs at grades A*-C indicator, the gap is broadly similar. Of female pupils, 74.6% achieved at least five GCSEs at grades A*-C, including equivalents, and with GCSEs in English and Mathematics, compared with 64.7% of males.
- 4.29. For those pupils in the final year of an A level or equivalent course, 71.9% of females and 65.3% of males attained three or more A levels at grades A*-C, or equivalent. The Joint Council for Qualifications data for 2018 shows that, at A level, grade A*, Northern Ireland male candidates outperformed females for the first time by 0.4 of a percentage point.

- 4.30. In the Department's [Post-Primary School Experiences of 16-21 year old people who are Lesbian, Gay, Bisexual and/or Transgender \(LGB&T\)](#), 65 respondents identified as transgender.
- 4.31. Key issues and challenges identified by pupils who identify as transgender included binary-gender classification and language/use of names in school.
- 4.32. Negative impacts identified by transgender respondents were as follows.
- Attendance 41.5%.
 - Participation in school life 56.3%.
 - Educational achievement 38.5%.
 - Career Planning 35.9%.
 - Emotional wellbeing inside and outside of school 73.8%.

Disability

- 4.33. Data gathered as part of the 2022-23 [Annual School Census Exercise \(March 2023\)](#) shows that 18.7% of pupils in schools were recorded as having special educational needs; and that 6.8% had a statement of special educational needs.
- 4.34. “Students with SEN or a disability have lower attainment levels than students without any SEN or disability and are less likely to go on to higher education.” Between 2012/13 and 2017/18, the trend in increasing attainment levels for all SEN pupils continued. The attainment gap, for those obtaining 5+ GCSEs Grades A*-C, between SEN 1-4 pupils and those with no SEN decreased from 24.9 to 20.1 percentage points. The attainment gap between SEN 5 pupils and those with no SEN decreased from 41.7 to 29.9 percentage points. There is a need to reduce unnecessary and undue delays in the statutory assessment and statementing process. ([Key Inequalities in Education and Communities](#))
- 4.35. [IPSOS Independent Review of SEN Services and Processes \(March 2023\)](#)

Dependants

- 4.36. The [2015 Young Life and Times Survey](#) (of 16 year old young people) reported 9% of their respondents had caring responsibilities. The average age of a young carer is 12 (Barnardo's *Still Hidden, Still Ignored Who cares for young carers?* December 2017).
- 4.37. At 31 March 2022, there were 3,624 Looked After Children in Northern Ireland. [Childrens Social Care Statistics Northern Ireland 2021-22](#)
- 4.38. It has been identified that in Northern Ireland, 6,700 young people (aged 0–17) were providing between 1 and 19 hours of unpaid care per week, while a further 960 were providing 20-49 hours, and 820 were providing 50 hours or more. [2011 Census | Northern Ireland Statistics and Research Agency](#)
- 4.39. [Young carers | Barnardo's \(barnardos.org.uk\)](#) found that young carers often miss out on opportunities that other children have to play, learn and be young. These young

people may not even recognise that they are facing challenges that other young people do not have to worry about. Many struggle educationally with being able to focus on school while feeling overwhelmed by other worries, or they can be bullied for being 'different'. They can become isolated, with no relief from the pressures at home.

- 4.40. “[Children Looked After] have often suffered many disadvantages in their lives and many of them have low educational achievements which are likely to impact on their future lives and chances for employment”.
- 4.41. Extract from DE Circular 2011/24 entitled “The introduction of Personal Education Plans for Looked After Children” – this can be accessed at [Introduction to PEP](#)
- 4.42. Research has shown it is more likely that children in those areas will experience health and social inequalities, such as lower life expectancy; higher suicide rates; higher rates of mental ill health, with more mood and anxiety disorders and more instances of self-harm; higher rates of alcohol-related deaths; higher drug-related deaths; lower educational attainment and greater likelihood of becoming involved in the criminal justice system; reduced income; lower socio-economic status; and increased homelessness and unemployment. (Source - [DoH LAC Strategy](#))

5. ASSESSMENT OF IMPACTS

- 5.1. The proposed policy has been considered and the following assessments made as to whether or not there will be an adverse impact on any of the nine Section 75 categories or any of the multiple identity groups.

| Group | Adverse Impact on specific sub-group |
|--------------------------|---|
| Religious Belief | <p>Whilst the Department has no specific data to determine the impact of the overall budget on this group, the 2022-23 annual school census breakdown of school population by religious belief in Northern Ireland showed that 30% of the school population are Protestant, 50% Catholic, 20% other religions or no religion.</p> <p>In the absence of more robust data outside of that above, it is difficult to determine the impact(s) on this group of the Department's 2023-24 budget allocation. However, this category will experience minor negative impacts through budget reductions to School Holiday Food Grant, CCMS, Healthy Happy Minds, Engage Programme, Extended Schools, North Belfast Principals Support Programme and Irish medium pre-school support service.</p> |
| Political Opinion | <p>Whilst the Department has no specific data to determine the impact of the overall budget on this group, there has been a historical tendency for religion to closely reflect the political opinion of the school population.</p> <p>In the absence of more robust data outside of that above, it is difficult to determine the impact(s) on this group of the Department's 2023-24 budget allocation. However, this category will experience minor negative impacts from budget reductions to School Holiday Food Grant, CCMS, Healthy Happy Minds, Engage Programme, Extended Schools, Leargas, Bready District Ulster Scots Development Association and the North Belfast Principals Support Programme.</p> |
| Race | <p>Whilst the Department has no specific data to determine the impact of the overall budget on this group, the Northern Ireland Statistics and Research Agency (NISRA) report on the 2022-23 school annual enrolments recorded that 6.1% (21,762) of the school population were from ethnic minority groups.</p> <p>The report also concluded that there has been an increase in the number and proportion of newcomer pupils in schools in Northern Ireland. A newcomer pupil is one who has enrolled in a school but who does not have the satisfactory language skills to participate fully in the school curriculum. In 2022-23,</p> |

| | |
|-----------------------|--|
| | <p>there were nearly 19,500 newcomer pupils accounting for 5.5% of the school population.</p> <p>As set out in “Key Inequalities in Education and Communities” document produced by the Equality Commission for Northern Ireland in October 2017; children from the Traveller community and Roma children have some of the lowest levels of attainment of all equality groups.</p> <p>This category will experience major negative impacts from budget reductions to School Holiday Food Grants. This category will also experience minor negative impacts from budget reductions to Healthy Happy Minds, Engage Programme, Extended Schools, and North Belfast Principals Support Programme.</p> |
| Age | <p>The Department provides benefit to all children and young people across NI.</p> <p>The 2022-23 annual school census indicated that:</p> <ul style="list-style-type: none"> • there are 22,715 pupils in funded pre-school education (pre-compulsory school age); • there are 171,199 pupils in primary schools and preparatory departments (Year 1-7); • there are 154,312 pupils in post-primary schools (Years 8 -14); and • there are over 6,651 pupils in special schools (ages 4 – 19). <p>This category will experience major negative impacts from budget reductions to School Holiday Food Grant, EA Block Grant, Engage Programme and Healthy Happy Minds and minor negative impacts from budget reductions to Playboard NI Play Policy, ASB, Extended Schools, North Belfast Principals Support Programme, and the BookStart Programme.</p> |
| Marital Status | <p>The Department provides benefit to all children and young people across Northern Ireland. Whilst the Department has no specific data to determine the impact of the overall budget on this group, in 2021 there were 7,921 marriages in Northern Ireland.</p> <p>Of those marriages in the age band 16-19, there were 56 males and 74 females. In the same period, there were 396 same sex marriages; in the under 25 age band there were 6.</p> <p>This category will experience minor negative impacts from budget reductions to School Holiday Food Grant, Engage</p> |

| | |
|---------------------------|--|
| | Programme and Extended Schools. |
| Sexual Orientation | <p>The Department provides benefit to all children and young people across NI.</p> <p>This category will experience minor negative impacts from budget reductions to School Holiday Food Grant, Healthy Happy Minds, Engage Programme, Extended Schools, and North Belfast Principals Support Programme.</p> |
| Gender | <p>The Department provides benefit to all children and young people across Northern Ireland.</p> <p>Whilst the Department has no specific data to determine the impact of the overall budget on this group, information drawn from the 2022-23 annual school census shows that there is a fairly even distribution of males and females within the school population, with 50.8% male pupils and 49.2% female.</p> <p>This category will experience minor negative impacts from budget reductions to School Holiday Food Grant, Healthy Happy Minds, Engage Programme, Extended Schools, and North Belfast Principals Support Programme.</p> |
| Disability | <p>The 2022-23 school census indicates that 18.7% of pupils in schools were recorded as having special educational needs; and that 6.8% had a statement of special educational needs.</p> <p>This category will experience major negative impacts from budget reductions to SEN⁷, School Holiday Food Grants and Healthy Happy Minds and minor negative impacts from budget reductions to Belfast Wide Early Years Pilot under Fair Start, Playboard NI Play Policy, EA Block Grant, Entitlement Framework, Engage Programme, Extended Schools, and North Belfast Principals Support Programme.</p> |
| Dependency | <p>The Department provides benefit to all children and young people across Northern Ireland.</p> <p>The 2015 Young Life and Times (YLT) Survey (of 16 year old young people) reported that 9% of their respondents had caring responsibilities.</p> <p>Barnardo's reported in 2017: "Still Hidden, Still Ignored, Who cares for young carers?" that the average age of a young carer is 12.</p> |

⁷ SEN includes SEN Block Grant, LSC and Implementation of SEND ACT 2016, SEND Transformation Programme, SEND Implementation Team SEND ACT (NI) 2016, Enhanced Autism Training Framework, SEN Early Years Inclusion Service

| | |
|-----------------------------------|--|
| | <p>It was identified in the 2011 Census that 6,700 young people (aged 0–17) were providing between 1 and 19 hours of unpaid care per week, while a further 960 were providing 20-49 hours, and 820 care for 50 hours or more.</p> <p>At 31 March 2022, there were 3,624 Looked After Children in Northern Ireland (Children’s Social Care Statistics for Northern Ireland 2021/22, Department of Health (DoH)).</p> <p>This category will experience major negative impacts from budget reductions to Healthy Happy Minds, School Holiday Food Grants and Engage Programme and minor negative impacts from budget reductions to Extended Schools and North Belfast Principals Support Programme.</p> |
| <p>Multiple identities</p> | <p>Significant investment is made annually by the Department in support of a suite of policies, interventions and programmes which help to address educational underachievement, including those with a particular focus on targeting disadvantage.</p> <p>The policy impacts people with multiple identities through the Engage Programme. There is a strong link between household income and school achievement. Children with multiple Section 75 characteristics are likely to be impacted to a greater degree than others and the effects of socio-economic disadvantage similarly impacts across all Section 75 categories. Children with multiple Section 75 characteristics are more likely to be selected for the programme as these groups have higher levels of educational underachievement and are more likely to require support to engage with learning. The evidence above illustrates that Age is the one Section 75 group that is significantly disproportionately impacted by the discontinuation of the Engage programme, given that the programme is targeted at children and young people in school.</p> <p>The policy impacts people with multiple identities through the programme Healthy Happy Minds. Evidence confirms that a number of life experiences can increase the risk of some children experiencing poor emotional/mental wellbeing. These include:</p> <ul style="list-style-type: none"> • experience of a range of childhood adversities, including poverty, emotional and physical abuse, and neglect; • poor attachment and chaotic lifestyles due to poor parenting and conflict within the family; • experience of suicide in the family or close community; • having a diagnosis of Autism Spectrum Disorder OR |

| | |
|--|--|
| | <p>Attention Deficit Hyperactivity Disorder; and</p> <ul style="list-style-type: none">• identifying as being LGBTQ. <p>Combinations of the above factors would lead to greater risk of experiencing poor emotional/mental wellbeing and early intervention as per research helps children and young people experiencing issues with their identity. The pilot however covers all emotional/mental health issues at primary school age and is not targeted to any one need.</p> <p>The funding of North Belfast Primary Principals Support Programme impacts people with multiple identities. There is a strong link between household income and school achievement. Children with multiple Section 75 characteristics are likely to be impacted to a greater degree than others and the effects of socio-economic disadvantage similarly impacts across all Section 75 categories. Children with multiple Section 75 characteristics are more likely to be selected for the Programme as these groups have higher levels of educational underachievement and are more likely to require support to engage with learning. The evidence illustrates that that there are a number of Section 75 groups that are likely to be impacted by the cessation of the Programme, but this is not considered to be significant, given the other policies and programmes in place. It is anticipated that this would therefore also apply to any child that would sit in more than one Section 75 category.</p> <p>The Extended Schools funding impacts pupils with multiple identities. There is a strong link between household income and school achievement. Children with multiple Section 75 characteristics are likely to be impacted to a greater degree than others, and the effect of socio-economic disadvantage similarly impacts across all Section 75 categories. Children with multiple Section 75 characteristics are more likely to be selected for the Programme, as these groups have higher levels of educational underachievement and are more likely to require support to engage with learning. The evidence above illustrates that that there is no Section 75 group that is significantly disproportionately impacted by the reduction of the Extended Schools programme. It is anticipated that this would therefore also apply to any child that would sit in more than one Section 75 category.</p> |
|--|--|

6. CONSIDERATION OF MEASURES WHICH MIGHT MITIGATE ANY ADVERSE IMPACT AND ALTERNATIVE POLICIES WHICH MIGHT BETTER ACHIEVE THE PROMOTION OF EQUALITY OF OPPORTUNITY

- 6.1. The impact of the Resource Budget for 2023-24 on the Department is extremely challenging with the Department facing the most unpalatable decisions to seek to manage its spending.
- 6.2. Sustaining a high quality and inclusive Educational System is a core priority for the Department. The Department's budget will continue to be deployed in support of this objective. The promotion of equality of opportunity and good relations is also an important part of ongoing policy development, legislative activities and operational programmes. In managing within the Resource Budget allocations, the Department will make every effort to protect front line service delivery.
- 6.3. The Department will seek to ensure that its budget allocations are applied as far as possible in a manner that does not disproportionately or adversely affect one Section 75 category.
- 6.4. It will however be difficult to mitigate the potential adverse impacts anticipated, given the scale of additional funding required in 2023-24. Where options for efficiencies are identified, these will be subject to separate screening. Where necessary, full EQIAs will be undertaken as options to live within the Department's 2023-24 budget allocations are further developed and implemented.
- 6.5. Budget allocations will be revisited during the financial year, particularly during the Monitoring Round process. Funding may be reallocated to other priority areas depending on relative spend levels in each Departmental business area. Responses from this consultation will be used to inform such reallocations.
- 6.6. While any efficiencies that can be identified will be pursued, the reality is that the Budget does not fully address all the Education pressures and will pose a significant challenge, given that about 80% of the sector's costs are staff related.
- 6.7. It is anticipated that the ongoing Independent Review of Education may identify potential opportunities to deliver a more efficient and more sustainable education system in the future, where resources are used more effectively for the ultimate benefit of our children and young people. However, this will not be delivered without political will and stakeholder agreement and will require Ministerial approval. Long term efficiencies will only be secured if there is adequate up-front funding to deliver on the Independent Panel's recommendations.
- 6.8. In respect of the identified adverse impacts, DE considers that the following actions will reduce or justify the impacts.

| Adverse Impact | Mitigation which improves equality of opportunity |
|---|--|
| PlayBoard NI Play Policy | The Department will explore with PlayBoard NI how PlayBoard can best use the resources available to continue to provide a level of support for delivery of play related services and activity. |
| Aggregated Schools Budget | The Department and the EA will monitor schools' spend as the year progresses. The EA will engage with schools to identify areas of expenditure which can be reduced and / or curtailed, to manage within budget as much as possible. That said, ultimately it must be recognised that there will be instances whereby schools incur unavoidable expenditure (e.g., there is limited scope for schools to reduce school staff pay costs in the absence of a voluntary exit scheme). |
| Irish-medium Pre-school Support Service | The Department will work with Altram and CnaG to manage the implications of the budget decision and ensure a level of support to Irish-medium pre-school settings. |
| Belfast Wide Early Years Pilot under Fair Start | VCSE partners will absorb the reduction to ensure that service delivery is maintained at current level. |
| NICIE | Minor impact on good relations in the religious belief category. While it is a reduction on the 2022-23 budget, staff redundancies can be avoided. This will mitigate the impact on good relations in respect of integrated schools and schools of other management types considering transforming to integrated status. |
| CnaG | Minor impact on good relations in the political category, whilst it is a reduction on the 2022-23 budget, staff redundancies can be avoided. This will mitigate the impact on good relations in respect of Irish-medium schools and communities considering the establishment or growth of Irish-medium schools in their area. |
| Engage | It could be considered that the impact of ceasing the programme is likely to be felt more in the Catholic sector as there are more Catholic school children overall, and a higher proportion of them are in receipt of FSM. However, the Department has other programmes which aim to target disadvantage such as Targeting Social Need (TSN) funding within the schools' Common Funding Scheme, and the Extended Schools programme. |
| Healthy Happy Minds | The Healthy Happy Minds pilot is currently the subject of an evaluation and a wider review on the correlation of primary and post-primary counselling services with outcomes. Introduction of any new provision will be subject to a |

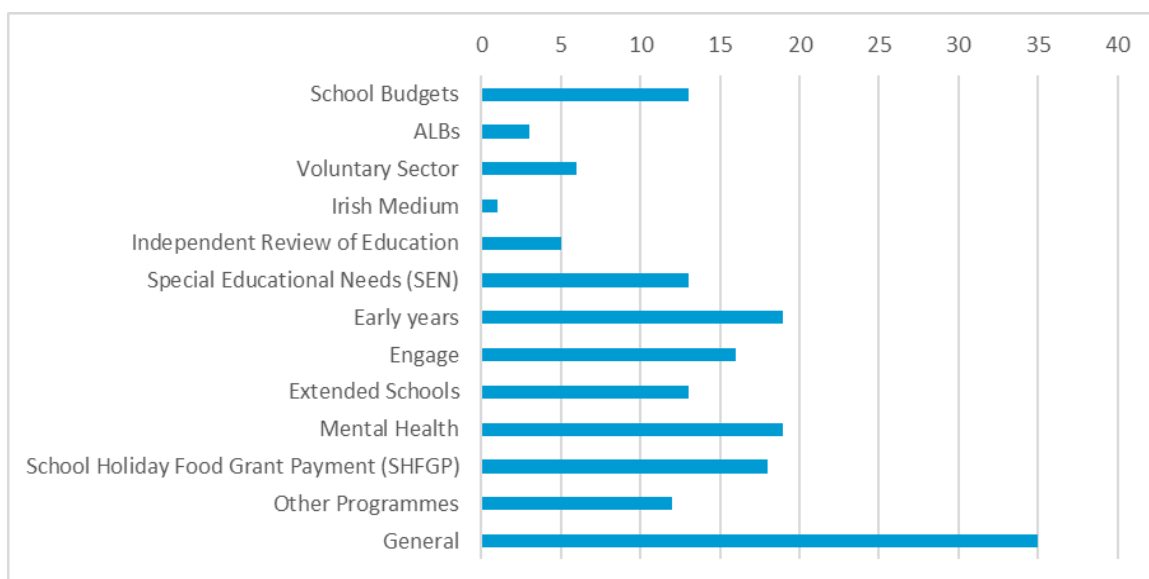
| | |
|---|--|
| | <p>positive evaluation and availability of funding.</p> <p>Alternative supports schools can provide to their pupils under the EHWB framework include age-appropriate resilience building to help children and young people recognise issues relating to mental health and adopt coping mechanisms to manage their mental health. Schools also access a range of other EHWB support for children and young people through the VCSE.</p> <p>Wider cross-Departmental work on children and young people’s mental health is also underway and includes mapping of voluntary and community supports that are available to children and young people/schools. Any alternative provisions will be signposted to parent/carers and schools.</p> <p>Other supports available for pupils and their parents/guardians within the education sector include:</p> <ul style="list-style-type: none"> • EHWB • Support for parents and pupils • Pupil Support Services - EA • The Intercultural Education Service helps schools to meet the additional educational needs of pupils from our target communities: Traveller; Newcomer; Asylum-Seekers; Refugees and Roma. <p>Support can also be accessed directly through health and social care services, including General Practitioners, Children and Adolescent Mental Health Service and Family Hubs.</p> |
| <p>The Executive Office (TEO) Asylum Seeker & Refugee (ASR) Dispersal Fund / ASR Welcome Hubs</p> | <p>In 2022-23, funding of £915k was provided by the Home Office via the TEO ASR Dispersal Fund to support schools and the EA in removing barriers to education for children arriving in Northern Ireland seeking Asylum. In 2023-24 the Department has bid for £1.6m from the same source.</p> <p>In 2022-23 DE provided £460k of funding for the operation of ASR Welcome Hubs at Malvern PS and Glengormley Integrated College. In 2023-24 the Welcome Hub at Glengormley will cease to operate due to a reduction in the number of ASR children attending the school. The Welcome Hub at Malvern will continue to operate. The Department has included the funding required within its 2023-24 TEO ASR Dispersal Fund bid.</p> <p>As funding in this regard for 2023-24 is from outside of the DE Resource budget and is likely to be met by TEO, Equality Screening has not been completed. In the event the bid to TEO is unsuccessful this will impact on children</p> |

| | |
|-----------|---|
| | from the ASR community and Equality Screening will be completed as necessary. |
| SEN | The majority of SEN expenditure is statutory and will not therefore be subject to any cuts. The Department has commenced a policy review which will provide further opportunity to assess the needs and effectiveness of SEN provision to best meet the needs of and deliver better outcomes for children and young people with SEN. |
| Bookstart | While the cessation of the Bookstart programme may disproportionately affect infants, the impact is mitigated by the availability of free books in local library services. Part funding for the Bookstart programme was introduced in 2020-21 given the reduced access to books for babies due to libraries being closed as a result of Covid-19 restrictions. Libraries are fully accessible in 2023-24. |

7. THE FORMAL CONSULTATION ON THE ACTUAL IMPACT OF EXISTING POLICIES AND THE LIKELY IMPACT OF PROPOSED POLICIES

- 7.1. On 19 June 2023, DE launched its Resource Budget 2023-24 EQIA consultation.
- 7.2. The consultation document was made available on the Department's website. A full copy of the Department's Resource Budget 2023-24 EQIA can be accessed at [DE Resource Budget 2023-24 Equality Impact Assessment](#).
- 7.3. All those recorded in the Department's Section 75 consultation list received an email informing them of the consultation arrangements.
- 7.4. The purpose of the consultation was to seek comments on any aspect of the proposals within the EQIA. Interested parties were encouraged to make responses by 13 August 2023, to inform further mitigation measures and reallocation of any additional funding available during 2023-24 and in-year bids.
- 7.5. There were 44 responses received and the key issues identified by respondents are summarised and presented with the Department's response at [Annex B](#). A list of respondent organisations is provided at [Annex C](#).
- 7.6. DE is grateful to all those who responded to the consultation document.
- 7.7. Respondents had differing priorities with a wide range of views expressed. The views of respondents have been summarised into 13 key themes.
- 7.8. The graph below summarises the number of concerns raised by respondents under each theme.

Graph 1: Summary of EQIA respondent concerns by theme



Analysis of responses

- 7.9. The following paragraphs summarise the key issues that were raised by respondents in relation to the proposals under each theme.

Schools Budgets

- 7.10. Overall spending per pupil for school aged children in Northern Ireland is falling behind the rest of the United Kingdom (UK) and the Republic of Ireland, and has not risen in line with inflation, despite a dramatic increase in operational cost.
- 7.11. As the ASB is already insufficient to cover the recurrent costs of delivering quality education and given that many schools are already in deficit; it is felt that additional cuts will have a detrimental impact on the learning experiences of children and young people. In addition, it will be unrealistic for schools to mitigate adverse impacts by identifying areas of expenditure which could be reduced.
- 7.12. There were concerns that budget cuts could increase stress and workload for teachers and other staff and reduce their morale. The EA HealthWell Programme provides staff with access to key health and wellbeing initiatives.

ALBs

- 7.13. Budget cuts to ALBs may result in schools no longer having access to support from experienced officials which are essential elements of every school's capacity to deliver the best possible education to their pupils.

Voluntary Sector

- 7.14. Many consultation responses voiced concern that a significant degree of reliance was being placed on the community and voluntary sector to absorb the effects of budget reductions.
- 7.15. Together with the lack of regular, inflationary increases in allocations to community and voluntary sector organisations delivering services on behalf of the Department, respondents commented that this has had the effect of driving down wages and terms and conditions for workers in the sector, resulting in inequalities between workers employed directly by government departments and ALBs and those working in the community and voluntary sector.

Irish-medium

- 7.16. The numbers in the Irish-medium sector are growing year-on-year and cuts will disproportionately affect children attending Irish-medium schools, and will also result in a significant reduction in the services that CnaG and Altram can provide.

Independent Review of Education

- 7.17. Respondents were of the opinion that the Department should evaluate decisions about resource allocations and the impact of those decisions against the criteria stated in the Independent Review of Education interim report.
- 7.18. Respondents also disagreed that the final report, due to be published later this year, should be used as a mitigation to in-year budget cuts, as the recommendations in the final report would impact future budgets rather than current year budgets.

SEN

- 7.19. With the significant increase in the number of children with SEN and an increase in the number of pupils accessing a placement in a special school or a placement in specialist provision in mainstream, respondents are concerned with the major negative impacts from budget reductions to SEN.
- 7.20. The majority of SEN expenditure is statutory and will not therefore be subject to any cuts. The Department is currently completing an End-to-End Review of SEN including work on SEN placements.
- 7.21. There is a risk of limited access to specialist youth work services. Every young person with a learning disability should have access to youth work services which promote social inclusion and support their personal development. Mainstream youth work is often not inclusive of young people presenting with SEN.
- 7.22. The Department will shortly commence a policy review which will provide further opportunity to assess the needs for, effectiveness of and improvements to the provision of youth services to meet the needs of young people presenting with SEN.

Early Years

- 7.23. There was concern regarding the level of investment in Early Years. Respondents felt that more must be done to ensure our youngest members of society are fully included and prioritised in policy decision-making processes, given the breadth of evidence that indicates the importance of these early years in laying robust foundations for a child's future wellbeing and success. The impacts of the budget on children aged 0-5 need to be considered.
- 7.24. The development of the Executive Early Learning and Childcare Strategy will provide a range of proposals for consideration by an incoming Executive, which, if supported, will require investment in the early years.

Engage

- 7.25. Respondents felt that, rather than minor negative impacts, there will be major negative impacts from budget reductions to the Engage Programme in the categories of race, gender, religion, and disability.
- 7.26. The Department had assessed that major impacts will occur in the age and dependency categories due to cessation of the Engage Programme but given that it was put in place to offset the impact of the Covid-19 pandemic on children's learning, it was always considered to be a short-term programme.

Extended Schools

- 7.27. Respondents believed that any cuts to the Extended Schools Programme would be felt by the most disadvantaged and vulnerable children and young people and that the categories of gender, race, age and disability will experience major, rather than minor, adverse impacts from budget reductions to Extended Schools.

Mental Health

- 7.28. Respondents disagreed with suggestions that the removal or reduction of mental health programmes such as Healthy Happy Minds could be mitigated by schools accessing EHWB support through the VCSE or from support accessed directly through health and social care services. Respondents felt that as voluntary, community and health and social care sectors are in equally pressured budgetary positions they are unlikely to be able to mitigate the Department's budgetary cuts. Limited capacity in schools will also have a significant impact on mitigation strategies.
- 7.29. A number of responses stated that the Section 75 category of gender would suffer major rather than minor adverse impacts, with no consideration to the potential impacts to transgender pupils despite research showing that LGBTQIA young people are at higher risk of experiencing mental health problems due to bullying, prejudice, discrimination and other factors.

School Holiday Food Grant payments

- 7.30. Respondents were of the view that this funding should be reinstated. As all children should have access to a healthy, nutritious meal during the holidays that the removal of this funding will add financial pressure to low-income families; especially lone parents who are predominantly female. The Department recognises that the discontinuation of the School Holiday Food Grant payments will have a negative impact on a number of Section 75 groups. The EQIA consultation assessed the impact to the gender and marital status categories as minor, and this assessment is still deemed to be correct.
- 7.31. Ringfenced funding was provided by the Executive from July 2020 to March 2023 to enable DE to make the School Holiday Food Grant payments. As the Executive ended this ringfenced funding from April 2023, the Department can no longer make the payments.
- 7.32. Section 75 categories of race, age, disability and dependency were assessed in the EQIA consultation as being impacted majorly by the cessation of the programme, which respondents were in agreement with.

Other Programmes

- 7.33. There is no reference to the budget reduction to free period products and how it will impact girls, especially girls entitled to FSM. However, the Department intends to conduct a survey with schools in 2023-24 to determine if the budget they have is sufficient for their pupils' needs and will review the budget needs in future years accordingly.

- 7.34. Respondents also highlighted concerns over budget reductions to the School Sports Programme, Digital Devices, the North Belfast Principals Support Programme, the Fair Start Action Plan, the Entitlement Framework and Young Enterprise NI.

General

- 7.35. Respondents are concerned about the funding of education in Northern Ireland and the negative impact this will have on children and young people, particularly more vulnerable children. In addition, respondents feel that additional funding should be allocated to Education by the Secretary of State and that Departments should work together to address the cumulative effects of cuts.
- 7.36. A number of responses commented on the information provided in the Department's EQIA, in particular the lack of detail and the analysis provided of potential impact on Section 75 groups. More detail has now been included in section 3.
- 7.37. Concern was expressed about the consultation period, as the timeline is not in line with what is stated in the Department's Equality Scheme. The Department sought responses within eight weeks given the scale of the budget reduction and the requirement to make budget decisions within a reasonable timeframe. Decisions are needed early in the financial year to allow forward planning and delivery of educational services.
- 7.38. A number of responses noted that a Rural Needs Impact Assessment was not yet published. A Rural Needs Impact Assessment⁸ was published on 3 August 2023.
- 7.39. It was noted that the EQIA does not fully consider multiple identities, as many children often represent multiple identities which can then intensify one individual's experience of negative impacts. The Department has attempted to summarise key impacts within the EQIA document, although it is recognised that there is limited information on those with multiple identities.
- 7.40. A number of responses highlighted that the lack of gender-disaggregated data hinders our ability to effectively advocate on behalf of women. It was requested that gender-disaggregated data be used to inform the decision-making process, and where there is no gender-disaggregated data, the Department needs to ensure that relevant data is gathered.

Conclusion

- 7.41. Over the past number of years, the Department has been operating within a constrained budget. The baseline position has been insufficient, and the Department has had to rely on in-year funding to deliver the core educational services that it is responsible for.
- 7.42. Education is facing unavoidable cost pressures and rising service demands associated with delivering statutory and policy obligations. Between 2010-11 and 2022-23, the school population has increased by over 25,000 children. Education is

⁸ [DE Rural Needs Impact Assessment on Resource Budget 2023-24](#)

impacted significantly by pay pressures, with the percentage of staff costs across the sector being much higher than any other sector i.e. c80% of the overall DE budget.

- 7.43. In considering the equality impact of the potential educational services reductions for 2023-24, the Department has paid particular attention to the statutory duties placed on it in legislation as these areas must take priority.
- 7.44. The responses outlined that there were negative impacts on all Section 75 groups in relation to specific proposed reductions.
- 7.45. The key issues identified by respondents are summarised in this report, and these will be considered by the Permanent Secretary when making decisions on the reallocation of the small amount currently held in contingency, and any additional funding that may be made available during 2023-24.

8. MONITORING

- 8.1. It is important that delivery of frontline services is maintained wherever possible, and that the finite resources available are prioritised carefully and used to greatest effect.
- 8.2. It must be recognised that without further additional funding, the budget position for the Department will continue to be extremely challenging due to the significant cost and demand pressures across the education landscape.
- 8.3. In the absence of any additional funding from Government, the Department will be left with no option but to fund a number of inescapable and statutory pressures (including pay), from within the current insufficient budget allocation. This is likely to lead to an overspend against the Department's 2023-24 Budget. This is not a sustainable position going forward.
- 8.4. The monthly outturn monitoring process will represent an opportunity to collect relevant data as the Department and its ALBs, where possible, may seek to address any adverse impacts of the 2023-24 budget by reprioritising the allocation of funding.
- 8.5. Monitoring will take into consideration feedback from individuals/groups representing the interests of people within the Section 75 Categories.
- 8.6. Budgets and resourcing positions are regularly monitored and discussed, including through respective sponsorship arrangements and at regular Governance and Accountability Review meetings.
- 8.7. Given the lack of opportunity to apply for additional budget funding for 2023-24, difficult decisions will have to be taken to prioritise funding pressures when submitting bids to DoF.

Table 6a: Ethnicity of pupils by school type, 2022/23
Funded pre-school education, Primary, Post Primary and Special Schools

| School and management type | White (excluding Irish Traveller) | Chinese | Irish Traveller | Indian/Sri Lankan | Pakistani | Black | Mixed ethnic group | Other ethnic group | Total |
|---|-----------------------------------|--------------|-----------------|-------------------|------------|--------------|--------------------|--------------------|----------------|
| Voluntary and Private Pre-School Centres (funded children only) | 6,655 | 16 | 14 | 41 | 6 | 55 | 130 | 126 | 7,043 |
| Nursery Schools | 5,455 | 22 | 17 | 45 | 13 | 62 | 103 | 79 | 5,796 |
| Nursery Classes & Reception ² | 9,127 | 28 | 32 | 113 | 25 | 102 | 258 | 191 | 9,876 |
| Primary Schools & Prep. Departments (Year 1 - Year 7) | 159,832 | 683 | 683 | 1,539 | 308 | 1,861 | 3,299 | 2,994 | 171,199 |
| Secondary (Non Grammar) Schools | 83,839 | 176 | 259 | 251 | 91 | 1,018 | 1,456 | 1,500 | 88,590 |
| Grammar Schools (Year 8 - Year 14) | 61,989 | 548 | 22 | 802 | 115 | 369 | 1,172 | 705 | 65,722 |
| Special Schools | # | 30 | 59 | 33 | 11 | 51 | # | 127 | 6,930 |
| EOTAS Centres | # | - | - | - | - | - | * | - | 21 |
| ALL FUNDED PRE-SCHOOL, NURSERY, PRIMARY, POST-PRIMARY, SPECIAL SCHOOLS and EOTAS Centres | 333,415 | 1,503 | 1,086 | 2,824 | 569 | 3,518 | 6,540 | 5,722 | 355,177 |

* Fewer than 5 cases.

Number suppressed.

¹. Enrolments for special schools and EOTAS centres relate those where pupils are single registered to the school or are dual registered and the special school/EOTAS centre is recorded as the main school.

². Figures include full time and part time pupils who are enrolled in nursery settings that are not part of PSEP but are rather in Specialist Provision for preschool aged pupils.

³. PSEP overview - [Pre-school education places | nidirect](#)

Department of Education Resource Budget 2023-24 Consultation Response Summary

The following tables summarise key issues raised under each theme.

Schools Budgets

| Issue | DE Response and proposed actions |
|---|--|
| Budget cuts could lead to a decrease in the number of teachers available to teach children with disabilities or by appointing teachers who are not experienced or qualified to deal with the complexity of children's needs, this could have a negative impact on the educational outcomes of these children, or they receive poor provision. | There is no indication that inexperienced or unqualified teachers would be appointed to deal with children with complex needs. |
| Budget cuts could increase stress and workload for teachers and other staff and reduce their morale. | <p>Teachers' health and wellbeing is an important consideration for DE and the employing authorities and a recent detailed review has been completed in this area and is under consideration by Teachers Negotiating Committee.</p> <p>The EA HealthWell Programme is available for all EA staff to avail of. The Programme provides staff with the latest health and wellbeing initiatives, sessions and campaigns taking place. The EA Health Well Hub also offers key health and wellbeing information, as well as initiatives around staying fit and healthy both physically and mentally.</p> |
| The funding received by schools for each pupil has not risen in line with inflation, despite a dramatic increase in operational cost. | The Department acknowledges and concurs with the observation. For a sustained period of time (i.e., over a decade), the ASB spend per pupil has not kept pace with real term increases and to a lesser degree growth in pupil numbers. Clearly, the higher levels of inflation now faced by the Northern Ireland and wider global economy exacerbates the current schools' financial position. However, the Department's current constrained budget has necessitated |

| Issue | DE Response and proposed actions |
|--|--|
| | difficult decisions, one of which has been the inability to allocate as much funding to the ASB as officials would have if presented with a significantly increased budget allocation. |
| Cuts to the ASB could result in school closures, increased class sizes, a reduction in class contact time and teaching and non-teaching redundancies which will have a detrimental impact on the learning experiences of children and young people, as well as the health and safety of school staff. | The Department does not fully agree with this statement. That is, the closure of schools is not an anticipated outcome of the current financial pressures facing the ASB. In addition, the Department and its ALBs do not presently have access to voluntary severance funding, nor indeed DoF approval to affect redundancies. There is no indication that there will be a reduction in class contact time. |
| This consultation has failed to acknowledge the impact that the current recruitment crisis will have on schools' ability to identify areas for efficiency savings. | There is no identified teacher recruitment crisis – the statistics do not support this other than some difficulties in recruiting some staff to specialist roles in schools. |
| How long will the Education system be able to maintain school quality in light of cuts both to the ASB and to the support services schools rely on? Any impact on school quality is likely to disproportionately affect non-grammar schools and those teaching the highest numbers of disadvantaged pupils, as these can rely less on parental resources, both in terms of finances and social and cultural capital in the home. | The Department understands the concerns raised in this comment but given the actual mechanics of the Common Funding Formula (CFF), the Department does not fully accept this comment. That is, the financial pressures currently facing the ASB have no impact on how much funding is distributed to schools via the I TSN factor via the CFF. The TSN factor distributes funding to schools using a social deprivation element which recognises the additional costs faced by schools in educating children from socially deprived backgrounds, regardless of ability, and the particular challenges faced in schools with high proportions of children from such backgrounds. The measure used to determine social disadvantage is entitlement to free school meals. |
| The suggestion that the 'EA will engage with schools to identify areas of expenditure which can be reduced and/or curtailed' is unrealistic. The ASB is already insufficient to cover the recurrent costs of delivering quality education and many schools are already in deficit. | The Department acknowledges the concerns raised in this comment. Given the scale of the funding shortfall faced, neither the Department nor the EA expect this engagement to bring schools fully into budget. However, given the gravity of the situation that we collectively face, the Department |

| Issue | DE Response and proposed actions |
|---|---|
| | contends that where there is scope to reduce or curtail expenditure for the wider benefit of education, such possibilities should be explored and / or taken forward, provided of course that they do not detrimentally impact children in our schools. |
| Cuts to schools' internal budgets are likely to target all additional supports (i.e., those beyond the basic staffing for each class) offered in the school; breakfast and homework clubs, SEN additional provision, counselling and wellbeing services etc. Such cuts will inevitably have greatest impact on some of the section 75 categories. | EHWB is being addressed across Education and Health under the EHWB in Education Framework launched in February 2021. The remaining two programmes of support in the implementation plan are commencing from Sept 2023. The collective supports are intended to build resilience and provide early support to reduce the likelihood of pupils reaching the need for crisis support such as Child and Adolescent Mental Health Services (CAMHS). Post-primary counselling remains available to schools and is not impacted by school budget cuts. |
| Many schools are already in need of urgent and ongoing repairs and unscheduled maintenance/have been earmarked for new builds or extensions/are the subject of reorganisation and amalgamation. Delays in these initiatives will inevitably put undue pressure on school budgets year on year. This is a false economy. Delays in capital funding increases the pressure on diminishing budgets and this in turn adversely affects all children and young people in the Section 75 categories who are currently enrolled in those schools awaiting capital funding. | Sufficient capital and maintenance funding has simply not been available to address the considerable infrastructural needs across the estate. In terms of capital alone, the Department started this financial year (2023-24) with an Executive capital allocation of £171 million, which represents a 9% reduction on the previous year. We are also facing unprecedented increases in construction market prices, which has significantly reduced the Department's spending power. |
| The Department of Education NI should recognise the role that the learning environment plays in facilitating pupil attitudes, behaviour and attainment as well as staff retention, and that the Department of Education NI restores and extends their financial commitment to investing in the schools estate, addressing the chronic maintenance backlog and committing to an ambitious capital build programme. | This means exceptionally difficult decisions are having to be made about what minor work and maintenance schemes can proceed. We have prioritised available investment to emergency works to ensure schools remain open to pupils and to provide access to full-time education for the significantly increased numbers of pupils with SEN. This has meant that we are not in a position to progress many high |

| Issue | DE Response and proposed actions |
|--|---|
| | <p>priority schemes across both our capital programmes. Maintenance has also largely been reactive. All of which has increase pressures on the operation of schools, impacting particularly on the most vulnerable with specific needs that must be urgently addressed.</p> <p>The Department continues to make the case for additional capital funding for Education to the DoF and Northern Ireland Office.</p> |
| <p>Review the classification of voluntary grammar schools as Non-Departmental Public Bodies to allow schools to seek additional borrowing facilities which will allow them to progress much needed capital projects.</p> | <p>The Department is continuing to engage with DoF with regards to the classification status of Voluntary Grammar Schools as Non-Departmental Public Bodies and the application of rules regarding borrowing by these schools.</p> |
| <p>The Department should be transparent about the flow of funding from DE to individual schools.</p> | <p>The Common Funding Scheme is published each year which clearly outlines how the CFF works. Schools' CFF budget shares are also published. Both these items can be accessed on the following hyperlink to the DE website Common funding formula schools budgets 2023-24.</p> |
| <p>We recommend the transfer of resources from grammar schools to secondary schools to ensure that children from the most deprived backgrounds are protected from the worst impacts of the budget cuts to schools. This will strengthen equity across schools, in light of the pupil premium enjoyed by grammar schools, while minimising impacts as grammar schools also have a long history of parental contributions, which supplement budgets.</p> | <p>To affect this change would require a consultation. Given the nature of this particular change, it would benefit from a functioning Executive, including an Education Minister along with the challenge function of the Education Committee. Notwithstanding this, and in response to the recommendation, the financial pressures currently facing the ASB have no impact on how much funding is distributed to schools via the TSN factor via the CFF. The TSN factor distributes funding to schools using a social deprivation element which recognises the additional costs faced by schools in educating children from socially deprived backgrounds, regardless of ability, and the particular challenges faced in schools with high proportions of children from such backgrounds. The measure used to determine</p> |

| Issue | DE Response and proposed actions |
|---|--|
| | social disadvantage is entitlement to FSM. |
| Data on funding received by schools through the ASB is not included in the EQIA and it should be highlighted through data that funding received has not risen in line with inflation and rising operational costs. | The Department has noted this concern and will take this forward in future EQIA's. |
| We believe that rather than minor negative impact there will also be major negative impact from budget reductions to EA Block Grant, Entitlement Framework and locally based community/school provision. | The Permanent Secretary has set out very clearly his rationale for reductions to budgets and in some cases, the stopping of some programmes. Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State. In so doing, school budgets have been largely safeguarded. |
| The Department has already announced that it will be reducing the number of staff employed by the Department. This will lead to a decrease in the number of teachers, support staff, and administrators available to provide educational services. | The potential reduction in staff in DE has no direct correlation with staff employed in schools. |
| DE contends that the budget cuts will have a minor impact on those young people within the Sexual Orientation category. However, the number of young people identifying as LGBTQ+ and seeking help and support within schools is increasing. At the same time, schools are already experiencing a drain on resources and staffing available to support young people. Reductions in education sector budgets has the potential to pose major negative impacts on this group of young people. | EHWB is being addressed across Education and Health under the EHWB in Education Framework launched in February 2021. The remaining two programmes of support in the implementation plan are commencing from Sept 2023, i.e. the Emotional Wellbeing Teams in School and Being Well Doing Well. The collective supports are intended to build resilience and provide early support to reduce the likelihood of pupils, including those identifying as LGBTQ+ reaching the need for crisis support such as CAMHS. Post primary counselling remains available to schools and is not impacted by school budget cuts. |
| A more detailed analysis is required of how more general cuts to DE budget streams such as, reduction in the ASB, Entitlement Framework or reduction in EA Block Grant may impact on Section 75 groups. | The Department launched the EQIA to ensure that it fully understood the impacts on all Section 75 groups. |
| The EA, which is responsible for the day-to-day funding of schools and youth services, has stated that it would need to make approximately | The EA has provided this figure to contextualise the scale of its funding gap using a metric other than £p. There was no |

| Issue | DE Response and proposed actions |
|---|---|
| 6,600 staff redundant to deliver the savings required of it. | intention that these redundancies would actually take place. |
| We are concerned that this budget does not allow for any future pay deals for teachers and non-teaching staff as, due to their contractual obligation to meet any pay settlements, the EA may then face even further cuts and savings expectations. | The Department recognises this issue but must work within the NI Public Sector Pay Policy Guidance. |
| We are deeply concerned about the impact that these budget cuts will have on the implementation of the pay and grading review. The continued stalling and delays in implementing the review will not be acceptable. | |
| We share the view of the EA's Chief Executive, Sara Long, on earmarked funds. It may be pragmatic to consider ringfencing such funds to ensure that the targeted funding for those most vulnerable children continue to be directed at the vital programmes that help to tackle poverty and educational underachievement. | There are a number of ring-fenced programmes in place including the Extended Schools Programme serving c450 schools each year, Full Service Programmes in North and West Belfast and a variety of geographical interventions across Northern Ireland. Whilst ring-fenced budgets have their place, there can also be downsides in terms of lack of flexibility, reporting and integration with other policies / programmes. We are happy to keep this issue under review. |
| Overall spending per pupil for school aged children in NI is falling behind the rest of the UK and the Republic of Ireland. Why does the lack of equality continue? | The Department continues to make the case each year for additional funding based on a comprehensive analysis of the financial pressures facing the sector. That said, the Department does not determine what its final budget outcome will be each year, but rather, the Education pressures are considered alongside other competing pressures across all Northern Ireland Departments. |
| This consultation is meaningless and does not address the core questions which will be the direct impact an underfunded education system will have on children and young people and their ability to fulfil their potential. | The Department notes this concern. |

ALB's

| Issue | DE Response and proposed actions |
|-------|----------------------------------|
|-------|----------------------------------|

| Issue | DE Response and proposed actions |
|---|--|
| <p>The Department needs to explain further how it intends to work with NICIE, Comhairle na Gaelscolaíochta and Altram regarding the implications of the Education budget.</p> | <p>The Department holds regular Governance meetings with NICIE and CnaG at which finance and all associated pressures are discussed.</p> <p>The Department has increased the initial 2023-24 allocation and will consider any appropriate Business Case in relation to funding levels in the context of the available budget. The Altram budget has been increased by £58k between interim and final budget, however it still remains less than the 2022-23 level. The Department holds regular update meetings with Altram.</p> |
| <p>With the exception of NICIE and CnaG, the cuts outlined that ALBs are required to make are not noted in the consultation document. The cuts to these two ALBs are also only mentioned in the context of good relations in relation to the 'political' category. The document should outline the wider impact on the ALBs and their work in full and what equality implications this has across the Section 75 categories.</p> | <p>The Department remains of the view that the main equality implications are appropriately recorded in relation to good relations religious belief category and political category respectively.</p> |
| <p>The reductions required in the budgets of CCMS and EA will inevitably lead to reduced levels of service. In this regard all schools will no longer have access to levels of support from experienced officials in areas such as curriculum provision, finance, governance, estates maintenance and strategic planning, etc which are essential elements of every school's capacity to deliver the best possible education to their pupils.</p> | <p>The Department holds regular Governance meetings with ALBs at which finance, and other strategic issues are discussed.</p> |
| <p>The Department refers to a reduction in budget to Arm's Length Bodies and TPO's. It is not clear if the impact of these reductions on Section 75 categories are included within the Department's overall EQIA neither is it clear how the impact of these budget reductions will be assessed or how the Department intend to monitor the impact on Section 75 categories as budget reductions become clear.</p> | <p>All budget reductions have been considered with the EQIA. The Department recognises the requirement to monitor actual impacts of budget decisions on the Section 75 groups and will continue to monitor the financial position and associated impacts as the year progresses. Specifically, the Resource Budget Equality Screening will be updated after each monitoring round throughout the year and if additional funding becomes available.</p> |

Voluntary Sector

| Issue | DE Response and proposed actions |
|--|---|
| There is concern over the potential implications on the VCSE absorbing the reduction in funding of the Belfast Wide Early Years project given the pressures already facing the sector. | The Department notes the concerns on the impact on the VCSE, however the Department can only operate within the limits of its budget in delivering statutory duties. |
| Why have some stakeholder and funded community and voluntary organisations been identified with potential mitigation and not others? | The Department recognises the lack of mitigations that can be presented to address the proposed budget reductions. However, as the reason for reduction is lack of available budget there is no budget available to implement mitigations. Where mitigations can be provided, they have been included in the screening form. |
| In identifying mitigations for the current budgetary pressures in schools the Department may wish to also consider the voluntary work of churches in local schools. | The Department appreciates this recommendation. |
| The Concordat between the Voluntary & Community Sector and the Northern Ireland Government states that the shared vision of Government and the Voluntary and Community Sector is to work together as social partners to build a participative, peaceful, equitable and inclusive community in Northern Ireland. This approach to budget development does not fully respect that aspiration for the voluntary and community sector to be social partners. | <p>The Department is taking forward work on a "Reducing Educational Disadvantage" programme which is about putting in place, locality-based solutions to tackling educational disadvantage through greater collaboration between schools and the VCSE.</p> <p>The Department continues to play a key role in the Joint Forum between VCSE and Government and the ongoing conversation with the VCSE in shaping the relationship that will underpin the Northern Ireland Civil Service (NICS) Renewal Programme.</p> |
| The significant degree of reliance on the community and voluntary sector to absorb the effects of budget reductions should be reviewed and considered in light of budget pressures and cuts facing the community and voluntary sector. | The Department acknowledges the concerns on the impact on the VCSE, however the Department can only operate within the limits of its budget in delivering statutory duties. |
| A lack of regular, inflationary increases in allocations to community and voluntary sector organisations delivering services on behalf of the | The Permanent Secretary has very clearly set out his rationale for reductions to budgets, and in some cases, the |

| Issue | DE Response and proposed actions |
|---|---|
| <p>Department has had the effect of driving down wages and terms and conditions for workers in the sector. This has, in turn, resulted in unacceptable inequalities between workers employed directly by government departments and arm's length bodies and those working in the community and voluntary sector.</p> | <p>cessation of some programmes.</p> <p>Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded.</p> |
| <p>There is a lack of recognition of the reduced capacity and funding across the voluntary and community sector, but voluntary and community are a sector which the report states will absorb the reductions to ensure service delivery is maintained at current level. For example, the reduction in funding of Childline Foyle has been absorbed by the NSPCC, but in picking up this shortfall there is a knock-on impact on NSPCCs resources available for other vital work, meaning there is still an impact on the children NSPCC supports.</p> | |
| <p>The indicative allocations as set out in the Budget 2023-24 EQIA also create potential for lasting impact on not only affected individuals but for the VCSE organisations who support them, for communities and wider society and on pressures to other key public services and budgets as a whole.</p> | |
| <p>Any decision to cease or reduce funding to the community and voluntary sector without the involvement or direction of elected Ministers raises concerns regarding accountability, transparency, and legitimacy.</p> | |
| <p>There are deep concerns about the capacity of the Community and Voluntary Sector (CVS) to cope with extra pressure and reduced funding.</p> | <p>The Permanent Secretary has set out very clearly, his rationale for reductions to budgets and in some cases, the stopping of some programmes.</p> <p>Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded.</p> <p>It should be noted that the Department's Youth Budget has</p> |

| Issue | DE Response and proposed actions |
|---|---|
| | been maintained at the 2022-23 level. Registered Community and Voluntary Sector Youth work providers who successfully applied to the EA for funding will continue to receive the agreed funding level. |
| The timescale to respond to this EQIA is insufficient given existing pressures on the Community and Voluntary Sector. We do acknowledge however that the Department has provided more time to respond than some of the other Departments and this is appreciated. | The timing of the budget announcement (27 April 2023) meant that the Department had to work at pace to publish the consultation document. The Department will endeavour to provide a longer response time in future EQIA's. |

Irish Medium

| Issue | DE Response and proposed actions |
|---|---|
| The Department needs to ensure that Irish-medium pre-school settings receive proper funding and support. | DE funding for non-statutory pre-school education places has remained at the 2022-23 rate, and Altram funding has increased by £58k between interim and final budget to ensure continuity of the Irish-medium pre-school support service. |
| This budget allocation will affect Catholic pupils in the political s75 category much more significantly. This has not been clearly reflected in Section 6 of the Equality assessment. | The Department notes this comment but has no specific data to determine the impact of the overall budget on political opinion. |
| The continued funding, albeit at a reduced rate, of CnaG and Altram has been cited in the EQIA as a means to reduce or justify the negative impacts of the budgetary cuts. However, numbers in the Irish-medium sector are growing year on year and cuts to the already limited budgets of CnaG and Altram will result in a significant reduction in the services that these organisations can provide. | The Department has revised the budget allocation for both CnaG and Altram for 2023-24, increasing the allocation in recognition of the pressures faced and its duty to encourage and facilitate the development of Irish-medium education. The Department will continue to engage on these matters. |
| It is evident that budgetary cuts affecting outcomes for the most vulnerable and disadvantaged children, will disproportionately affect children attending Irish-medium schools. It is our opinion that these cuts | DE is responsible for determining the number of students to be admitted each year to courses of Initial Teacher Education (ITE) in Northern Ireland, whilst DfE has |

| Issue | DE Response and proposed actions |
|---|--|
| <p>represent a derogation of the Statutory Duty by the Department of Education and a flagrant disregard for educational rights highlighted in the United Nations Convention on the Rights of the Child (UNCRC).</p> | <p>responsibility for the administration and funding of the ITE programmes. For 2023-24, DfE's funding of ITE intakes has been reduced by around 5%, due to the service-wide budgetary context and challenges. However, in line with DE's statutory duty to encourage and facilitate Irish-medium education, the reduction in intakes does not apply to Irish-medium ITE places.</p> |

Independent Review

| Issue | DE Response and proposed actions |
|--|---|
| <p>Any budgetary savings made from the implementation of the recommendations of the Independent Review of Education should be targeted at systemic rationalisations rather than cuts to front line services.</p> | <p>The Department cannot pre-judge the findings of the Review Panel. When the report is received the Department will consider appropriate next steps however it is expected that implementation would require Executive approval (given recommendations may be cross-cutting and / or contentious).</p> |
| <p>The following data sources are important: The Report of the Independent Review of Children's Social Care Services in NI, Health review statistics collected through delivery of Healthy Child, Healthy Future, data collated through Sure Start, the results of an NSPCC survey of young people in NI on their views and experiences of relationships and sexuality education published this year, information collected by ETI specifically on the Engage Programme and preventative curriculum.</p> | <p>The Department is aware that the Panel engaged with Prof Ray Jones in regard to the review of Children's Social Care Services. The Panel has also sought to gather a wide range of evidence and engaged with a high number of stakeholders.</p> |
| <p>DE refers to the Independent Review of Education as having the potential to deliver a more efficient and more sustainable education. However, this is part of a long-term future strategy and does not address the issues arising from the 2023-24 budget proposal. As it is not a relevant issue to the EQIA consultation it should not be included in the Assessment report.</p> | <p>Without pre-judging the findings of the Independent Review there is potential that the Review will make recommendations for implementation both in the short term and long term.</p> |
| <p>DE should evaluate decisions about resource allocation and the impact of those decisions against the criteria stated in the Independent Review of</p> | <p>The Department will consider the findings of the Independent Review when available and respond accordingly.</p> |

| Issue | DE Response and proposed actions |
|--|---|
| Education interim report. (Put the needs of learners first/Promote community cohesion/Equip learners at every stage of life with the knowledge, skills and attitudes to make a positive contribution to society and the economy). | |
| Notwithstanding the long-term nature of the Independent Review of Education, which we understand to be due to report in October or November, it is important that the Review team should – as a matter of urgency – publish an emergency report to outline its broad principles. The funding crisis is now and the principles to be adopted by the Independent Review of Education may assist in managing these unwelcome, severe, budgetary cuts. | The Independent Review Panel published its interim report in October 2022 which highlighted key issues to be covered in its final report and outlined principles for good education and good education systems. |

Special Educational Needs (SEN)

| Issue | DE Response and proposed actions |
|--|--|
| The report does not provide any specific recommendations for how nursery schools can improve their provision for children with SEN. Many of these children have complex needs which require higher staff ratios and specific knowledge and training which is not always forthcoming. | Increased demand and complexity of need in early years environments is recognised as a challenge. Ensuring all children receive a placement appropriate to meet their needs is a Departmental priority, as well as ensuring that staff have the skills appropriate to support all children. |
| The report does not mention the impact of budget cuts on the provision of SEN services. Funding for Special Educational Needs Coordinators (SENCOs) and for the SEND Transformation programme has been cut by 50%, despite the fact that there has been a 24% increase in the number of children with statements over the past five years, with hundreds of children waiting for specialist placements for September 2023. | The majority of SEN expenditure is statutory and will not therefore be subject to any cuts. The Department and the EA are however required to ensure that all spending is line with Managing Public Money NI, and as part of the End-to-End Review of SEN, all elements of SEN expenditure are under review to ensure that the system is delivering efficient, effective and sustainable services that improve outcomes for children and young people. |
| A lack of access to adequate SEN support may mean one parent having to take on additional caring responsibilities. This is a gendered issue, as mothers overwhelmingly perform this role, and are more likely than fathers to leave work due to caring commitments. | The Department notes this concern. |

| Issue | DE Response and proposed actions |
|--|--|
| <p>Children and young people with a learning disability are impacted by decisions made in most areas of government, not just 1 or 2 departments. Any proposed cuts will therefore have a long-lasting impact - which will be extremely difficult to redress later, if implemented - and will have a much wider impact on the health, wellbeing, prospects and economic contribution of individuals with a learning disability.</p> | <p>The Department notes the impact of cuts, however the Department can only operate within the limits of its budget in delivering its statutory duties.</p> |
| <p>In March 2020 NICCY produced a report on the particular barriers for children with SEN within an over-stretched and failing system. There is little evidence of the situation having improved significantly since the NICCY report in 2020 – indeed there are currently substantial shortfalls in special school places, including nursery placements.</p> | <p>It is accepted that the pressures in special school places, and mainstream with support is a consequence of under investment and a declining school estate, in the face of continued budgetary constraints. A Strategic Group will commence in September to lead on SEN placements moving forward.</p> |
| <p>Young people with SEN / disabilities are significantly under-represented in youth policy.</p> | <p>The comments relate primarily to youth policy rather than the consultation on the 2023-24 Resource Budget. Planning, funding and delivery of youth work is based on a composite (local and regional) assessment of needs. In recognition of the benefits of youth work, the Youth Budget has been maintained at the 2022-23 level. The Department's youth policy - Priorities for Youth - specifically references 'young people with special educational needs or disabilities' under Action 4.3(4) in relation to the provision of targeted support to help meet the needs of specific groups of young people.</p> |
| <p>Mainstream youth work is often not inclusive of young people with SEN / disabilities. DE should take the lead in the NI Executive ensuring that youth work is supported by appropriate levels of sustainable investment. This would mean every young person with a learning disability has access to youth work services which promote social inclusion and support their personal development.</p> | <p>Youth work settings aim to be inclusive of all young people as set out in the voluntary youth work curriculum – 'A Model for Effective Practice' in recognition of pilot programmes that demonstrated integrated and inclusive youth provision can make a vital contribution to the breaking down of barriers between young people with and without disabilities. This is recognised in the values of Equity, Diversity and Interdependence, which are important in shaping the youth work curriculum.</p> |

| Issue | DE Response and proposed actions |
|---|---|
| | <p>Where there are specific local needs, local assessment of need and local youth development plans can reflect these needs which are assessed on a case-by-case basis.</p> <p>The Department will shortly commence a policy review which will provide further opportunity to assess the needs for, effectiveness of and improvements to the provision of youth services to meet the needs of young people identifying as SEN/disabilities.</p> |
| <p>There should be mandatory learning disability training for professionals, to be delivered ongoing as part of continuous professional development.</p> | <p>The Department notes this recommendation.</p> |
| <p>Young children with a learning disability and their families should be identified as a priority group in key policy areas relating to early years, childcare, family/parenting support, child poverty and infant mental health.</p> | <p>The Department notes this recommendation.</p> |
| <p>The impacts on children with SEN should be analysed and highlighted in the consultation document.</p> | <p>The Department notes this recommendation.</p> |
| <p>The major negative impact on children and young people with SEN will disproportionately affect certain groups who may be over-represented in this category, such as those from the most disadvantaged backgrounds, ethnic minorities, and boys. It would be helpful to look at the data to see whether this is the case.</p> | <p>Data analysis is an area of work that is being developed as part of the End-to-End Review of SEN.</p> |
| <p>The EQIA fails to adequately consider or suggest mitigating measures specifically targeted for children with SEND who are recognised, by law, to be particularly vulnerable to discrimination.</p> | <p>The Department recognises the lack of mitigations that can be presented to address the proposed budget reductions. However, as the reason for reduction is lack of available budget there is no budget available to implement mitigations. Where mitigations can be provided, they have been included in the screening form.</p> |
| <p>The EQIA also notes that children with disabilities will experience ‘major negative impacts’ from budget reductions, and lists the relevant areas of departmental spending, but fails to provide any detail around the ultimate consequences for children. From our perspective, this analysis is insufficient and incomplete.</p> | <p>The Department notes this concern.</p> |

| Issue | DE Response and proposed actions |
|--|--|
| <p>We would also remind the Department that not all disabled pupils will be recorded as having special educational needs or have a statement of special educational needs. While we would agree with the determination that disabled people will experience major negative impacts from this budget, it is our view that it is imperative that the Department consider how all disabled people will be impacted and not just those with special educational needs.</p> | <p>The Department recognises that not all disabled children and young people receive a statement of SEN. The EQIA has considered all section 75 groups including Disability.</p> |
| <p>We note that funding for SENCOs has been reduced significantly and we would query why is there no acknowledgement in the EQIA of the 50% reduction to the SEND Transformation Budget which will undoubtedly impact this S75 group and their families.</p> | <p>While the majority of SEN expenditure is statutory and not subject to any cuts, additional SENCO funding is provided to support schools to make the necessary preparations for implementing the new SEN Framework. Commencement of many of the provisions within the SEN Framework have yet to be formally enacted and as such there is currently no statutory obligation to implement the new duties. The Department acknowledges the reduction in funding, however given the extremely challenging financial circumstances is pleased to be able to maintain support for SEND Act implementation.</p> |
| <p>The EA reported a significant increase in the number of children with SEN and an increase of 26.44% in the number of pupils accessing a placement in a special school and in the same period, a 24.1% increase in the number of pupils accessing a placement in specialist provision in mainstream with this trend expected to continue. As forecast by DE, total expenditure for SEN is projected to be £500 million in 2022-23, an increase of 100% over the previous 8 years and accounts for nearly 25% of the budget. CSSC is extremely concerned with the major negative impacts from budget reductions to SEN reported by school leaders and highlighted by the EQIA Consultation Report on the 2023-24 Resource Budget.</p> | <p>The EA has a statutory obligation to provide appropriate, tailored support to children and young people once they receive a statement of SEN, and demand for these services is rising steadily with SEN expenditure now accounting for more than 50% of the EA's overall block grant. Whilst provision of SEN is a statutory requirement and must be met, there is uncertainty over the precise level of increased demand. This will be monitored in-year.</p> |
| <p>Recommendation that that DE should prioritise its End-to-End Review of SEN in NI and that ambitious SMART targets are set, monitored, and reported for the delivery of real change, prioritising children's needs and</p> | <p>The Department notes this recommendation and is continuing to work closely with the EA and other stakeholders on a comprehensive transformation agenda for</p> |

| Issue | DE Response and proposed actions |
|--|--|
| improving the delivery of services by the EA, health professionals, schools, ITEducation providers and others. | the SEN system with a focus on improved outcomes and more cost-effective delivery. An in-depth analysis of performance measures and outcomes is part of the end to end review process. |
| The EQIA acknowledges that there will be major adverse impacts of budget cuts to SEND and other programmes for children with disabilities but fails to include any specific data detailing programmes that have been or will be cut, precluding an informed assessment of the implications of cuts for children with SEND. | Further information on SEN funding has been included in section 3. There is uncertainty over the precise level of increased demand, this will be monitored in-year. |

Early Years

| Issue | DE Response and proposed actions |
|---|--|
| Although DE has recognised the importance of Early Years there is concern regarding the level of Sure Start provision, that this is not expanding. | The Department has increased the level of spending in the Sure Start programme from £9m in 2006 to £30.6m in 2023-24 through the ongoing expansion of Sure Start availability and services. |
| Sure Start provision needs to assist those most in need. It is unclear how information at super output level rather than ward level inform those postcodes that can avail of the programme. | <p>Sure Start provision is targeted toward children (and their families) living in the most disadvantaged areas in NI, according to the official measure of deprivation in NI (NI Multiple Deprivation Measure). Super Output Areas are much smaller than Ward areas and are therefore more likely to identify pockets of deprivation.</p> <p>An ongoing review of Sure Start, commissioned by DE, is considering the current methodology of targeting of Sure Start services in Northern Ireland.</p> |
| We are concerned that the data used to determine the number of children enrolled in preschools is taken only from school census data. This does not capture the numbers of children living in Sure Start areas, making it difficult to assess the impact of cuts to pre-school programmes on the youngest and most vulnerable children. | Funding to most of the early years programmes has subsequently been re-instated. |

| Issue | DE Response and proposed actions |
|---|---|
| <p>Given the reduced budget for the Getting Ready to Learn (GRtL) programme, the DE needs to explain how it intends to work with the EA to ensure that there will be sufficient support provided for pre-school settings to engage with parents of pre-school children.</p> | <p>The GRtL budget has been reinstated to the 2022-23 budget amount.</p> |
| <p>The data used in this EQIA relates to school-aged children. The impacts of this budget on children aged 0-5 have therefore presumably not been considered. One example of the failure to adequately consider the needs of pre-school aged children is the impending closure of nurseries in special schools, which will have major detrimental impacts on our youngest children living with disabilities.</p> | <p>Increased demand and complexity of need in early years environments is recognised as a challenge. Ensuring all children receive a placement appropriate to meet their needs is a departmental priority and ensuring staff have the skills appropriate to support all children.</p> |
| <p>There is a gap between the Department's stated policy commitments and investment in Early Infant Mental Health. Investing in child development from the earliest possible stages will not only foster good relationships and promote mental, emotional and social wellbeing - it will also save DE (as well as other Departments, public authorities and ALBs) significantly more money in the longer-term, when social, emotional and mental health issues might otherwise have become more entrenched or complex.</p> | <p>The emerging Executive Early Learning and Childcare Strategy will provide a range of proposals for consideration by an incoming Executive, which if supported will require investment in the early years.</p> |
| <p>The Department should ring-fence budget allocations that relate to early years services and programmes, in recognition of the fact that investment in early years is a previously established Executive priority.</p> | |
| <p>The 0-4 age group are often an invisible group not given thorough consideration in Equality screening processes as the school census data documents only 4 year olds, leaving the 0-3 age group largely unseen to policymakers. As this Department has responsibility for all ages of children, we believe more must be done to ensure our youngest members of society are fully included and prioritised in policy decision-making processes given the breadth of evidence that indicates the importance of the first 1,001 days in laying robust foundations for a child's future wellbeing and success.</p> | |
| <p>A suite of funding for early intervention and further sustained support should be reviewed and, in light of that review, reinstated and supplemented to address educational disadvantage as a result of socio-</p> | |

| Issue | DE Response and proposed actions |
|---|---|
| <p>economic factors. Short sighted cuts and ‘savings’ made during these formative years will ultimately result in further and greater public spending to address the resultant societal issues in the future.</p> | |
| <p>Continue to prioritise and invest in Early interventions, where the evidence shows you get the biggest impact. This should be supported through investment in the graduate workforce to support children and families who are most vulnerable in the early years. Investment in Sure Start should be increased and made sustainable to widen the reach to meet those who are educationally disadvantaged.</p> | |
| <p>We note that childcare is not mentioned in the draft EQIA, despite the ongoing work of the Department to develop an Early Education and Childcare Strategy. Appropriate, accessible and affordable childcare provision in Northern Ireland should, alongside providing for the child, additionally seek to promote equality of opportunity for parents and benefit wider society and the economy. Good childcare provision is key to increasing economic participation and women’s economic independence and in promoting equality between men and women.</p> | |
| <p>The ending or reduction of Early years programmes will have a major impact on the Catholic family of schools. We would therefore disagree with the DE assessment that budget cuts in these areas would have ‘minor negative impacts’ in the Section 75 category of Religious Belief.</p> | <p>Funding to most of the early years programmes has subsequently been re-instated.</p> |
| <p>The data sources appear to exclusively focus on school age children, to the neglect of pre-school and younger age groups.</p> | <p>The Department notes these comments and is committed to improving availability of data including in relation to Section 75 categories.</p> |
| <p>We are disappointed to note an absence of reference to the <i>science of early childhood development</i> in this EQIA - most notably in respect of race and disability - and the extent to which children in these protected groups disproportionately experience adversity. Children who belong to minority ethnic groups and those who live with disabilities are particularly vulnerable to Adverse Childhood Experiences (ACEs) Source - Forde et al (2019) The weathering hypothesis as an explanation for racial disparities in health: a systematic review. Annals of Epidemiology,33,1-18.e3 Source - Morgart et al (2021) Adverse</p> | |

| Issue | DE Response and proposed actions |
|--|--|
| childhood experiences and developmental disabilities: risks, resiliency, and policy. Developmental Medicine & Child Neurology, 63(10), 1149-1154. | |
| The categories of race, age and disability will experience major, rather than minor, negative impacts from budget reductions to Playboard NI Play Policy, BookStart, Belfast-wide Early Years Pilot under Fair Start, Playboard NI Play Policy and other mental health and emotional wellbeing services in early year. | The Department is satisfied the impact of the budget reduction to PlayBoard NI Play Policy is minor. The Department is currently considering how it can support wider recognition of the value of play. |
| The EQIA does not include data that indicates any analysis has been undertaken of differential impacts for children within different age bands. For example, withdrawal of the BookStart programme will disproportionately affect infants in NI, who, as pointed out in a recently published report on the consequences of the cuts, 'will be the only children in the UK who will be prevented from accessing these important, evidence-based resources'. | Part funding for the BookStart programme was introduced in 2020-21 given the reduced access to books for babies due to libraries being closed as a result of Covid-19 restrictions. Whilst the Department recognises the potential negative impact of the cessation of part funding of BookStart on children in their first year, the impact is mitigated by the availability of free books in local library services. |
| While we are relieved Sure Start services were not cut, without an uplift it means these services are operating with a real terms cut against sharply rising costs. While the loss of service won't be as catastrophic as proposed there will still be less service. We also are awaiting confirmation about our Early Intervention Services - extended to August but uncertain beyond that. Finally, our Family Support Hubs received no uplift either...so they are operating on the same budget.' | The Sure Start budget in 2023-24 was sustained at the same level as 2022-23 i.e. £30.6m. DE is working closely with the DoH (which administers the programme) to ensure optimum delivery of Sure Start services within this context. |
| The Department has identified that the budget will have a negative impact upon a number of Section 75 categories including age. However, we note several groups are excluded from the analysis, including children under 3 and asylum and refugee children who are not yet placed within the school system. | The EQIA has considered all S75 groups. |
| There were also a number of proposed cuts announced by the Department, including the Pathway Fund, Sure Start, Bright Start, Toybox and the Extended School programme. It was subsequently announced that these would not be cut. However, no reference to any of these | At the time of circulating the EQIA, funding for Sure Start, the Pathway Fund, Toybox project and Bright Start School Age Childcare Funding had been confirmed and did not include reductions to the previous year's budget. |

| Issue | DE Response and proposed actions |
|--|---|
| programmes or initiatives are referenced within the EQIA. | |
| <p>The EQIA sets out initial decisions in relation to cuts made and reversed before the EQIA was issued for consultation. Information relating to whether potential equality and good relations impacts were taken into account, when reversing these decisions should be set out in the EQIA. It is important that such impacts are considered if these proposals are subsequently to be taken forward.</p> | <p>Having carefully considered all of the principles in the Secretary of State’s decision-making guidance, the Permanent Secretary decided not to cut funding to Youth services and a range of Early Years programmes including the Pathway Fund, Sure Start, Bright Start and Toybox or to proceed with the full scale of proposed cuts to Extended Schools.</p> <p>Having considered the scale and cumulative impact of the proposed cuts, which represent a major change to long standing Ministerial programmes and policies, it is the Permanent Secretary’s view that such a decision should be taken by a Minister, not a Permanent Secretary.</p> |
| <p>We are concerned that some proposed mitigations include the Community and Voluntary sector absorbing the cuts in order to ensure delivery of the Belfast wide Early Years Pilot continues to be delivered at the current level. This sector is facing unprecedented cuts, resulting in incredibly challenging situations for organisations trying to maintain staff and delivery levels. To suggest that an already stretched sector can absorb further cuts as a mitigation is an inadequate response from the Department.</p> | <p>The funding for the Belfast Wide Early Years Pilot was reduced by £32K (11%) in 2023-24 due to pressures on the Fair Start budget. The reduction was spread across the four delivery partners. The project has continued as planned and is achieving against its targets. This funding is for a discreet pilot and any reductions in funding to it would not have impacted on any other VCSE organisations.</p> |
| <p>We recommend that DE approach the budgetary process with a focus on ringfencing those parts of their work that service/protect the most vulnerable, mindful of the principle of investing to ‘save’ and the importance of investment in early intervention and preventative services to mitigate impact on individuals, continued pressures on their own services/budget and on the public purse.</p> | <p>The Department notes this recommendation, however the Department can only operate within the limits of its budget in delivering its statutory duties.</p> |
| <p>The Department’s assessment of impact has failed to include the cessation of the Book Start programme which will have a major negative impact upon the youngest children. In failing to include this age category within the EQIA the adverse impact upon this age group has not been</p> | <p>Part funding for the BookStart programme was introduced in 2020-21 given the reduced access to books for babies due to libraries being closed as a result of Covid-19 restrictions. Whilst the Department recognises the potential negative</p> |

| Issue | DE Response and proposed actions |
|---|--|
| identified or adequately assessed. | impact of the cessation of part funding of BookStart on children in their first year, the impact is mitigated by the availability of free books in local library services. |
| We feel the importance and value of early intervention in mitigating various impacts of inequalities is not adequately acknowledged throughout this assessment. | The Department recognises the lack of mitigations that can be presented to address the proposed budget reductions. However, as the reason for reduction is lack of available budget there is no budget available to implement mitigations. Where mitigations can be provided, they have been included in the screening form. |
| <p>The recent report published by Professor Ray Jones relating to Children's Social Care urges an expansion of the current 38 Sure Starts and extending their reach to families with children aged up to 10. This recommendation is targeted at addressing how children's social care has become "skewed" towards child protection rather than family support work and that services for children must "re set the balance" by offering community-based social work and more early support. We believe this to be true and relevant to all services impacting the lives of children in NI because of the duties placed by the Children's Services Co-operation Act (CSCA) 2015 on all departments and agencies to co-operate in the planning, commissioning and delivery of services, which should enable the pooling of resources to address cross-cutting children's issues. This assessment could do more to outline what efforts have been and will be made to limit the potential scale of the impact on Section 75 groups by pooling resources across Departments to enable positive outcomes for children in Northern Ireland. Instead, this assessment vaguely indicates some will experience only minor negative impacts from the budgetary decisions being suggested noting the end of early preventative programmes such as the BookStart initiative as well as programmes emphasising learning through play and sensory experience which are vital to all children in their earliest years, but in particular to from minority backgrounds or with additional needs or disability. We would argue that these impacts should be listed as major rather than minor.</p> | <p>The Department has commissioned an independent review of its targeted Early Years programmes, the remit of which includes how Sure Start services are currently targeted. The Department has also engaged with Professor Jones on his review of Children's Social Care in NI. DE will consider the findings of its independent review, along with those of other relevant research e.g. A Fair Start, the Independent review of Education and the review of Children's Social Care, to inform any future development of the Sure Start programme. As previously, DE will engage with other Departments in programme development which will be subject to the availability of budget.</p> <p>The Department is currently working to establish a cross-Departmental Monitoring and Reporting Board to support the Children's Services Co-operation Act (CSCA) 2015 and Executive Children and Young People's Strategy, this will provide an opportunity to consider areas for co-operation and where resources may potentially be pooled.</p> |

| Issue | DE Response and proposed actions |
|--|---|
| <p>We feel the data provided is inadequate to enable us to fully respond. We are concerned that while the EQAI itself highlights the educational disparities for Traveller and Roma children, there is very little information on Roma children. Roma is a specified ethnic group but the population of Roma children in NI is unknown and therefore their levels of participation in education at the different stages.</p> | <p>Since 2008 the Department has funded the Toybox project which provides targeted support to Traveller and Roma children aged 0-4 years across NI. Toybox is delivered by a Voluntary and Community organisation which seeks to identify the location of Roma families across NI, to provide Early Years support via the Toybox project.</p> |
| <p>We feel that data provided is inadequate to enable us to fully respond. For the 0-4 age group the only information available is the number of children enrolled in pre-schools through school census data (i.e. only 1 year out of 4 years). As we do not have a total number of children in this age group, or for example, how many of these children live in a Sure Start area or do not, it is always difficult to assess if our very youngest children are being given sufficient consideration through a Department with a responsibility for all children.</p> | <p>Funding to most of the early years programmes has subsequently been re-instated.</p> |
| <p>We feel that data provided is inadequate to enable us to fully respond. Information is only available through children enrolled in school assigned as having a special educational need or a statement. Early intervention is key to supporting children's learning needs as they start formal education but the information supplied does not give us any information about the numbers of children who have been assessed, or are in the process of being assessed, as having a special educational need in the 0-4 age group. Issues in real time such as the closures of special educational pre-school units this September (2023) due to the demand for P1 class spaces are very concerning from an early intervention, planning and an equality perspective.</p> | <p>Data analysis is under consideration as part of the End to End Review of SEN.</p> |
| <p>There is a lack of regular inflationary rises for Non-Governmental Organisations (NGOs) delivering services on behalf of the Department. This has the year on year effect of driving down wages and terms and conditions, incrementally reducing services and fostering huge inequalities between direct government employees and those employed by NGO's. This is of particular relevance to Early Years expenditure, where outside of school nursery/units almost all other</p> | <p>The Department acknowledges the concerns on the impact on NGOs, however the Department can only operate within the limits of its budget in delivering statutory duties.</p> |

| Issue | DE Response and proposed actions |
|---|--|
| programmes/services are delivered by the community and voluntary sector. We would argue that in a normal year, if the Treasury awards a percentage uplift to the NI block and that follows to the Department, the same percentage should be applied to the budgets of NGO's automatically. | |
| When research points to the significance of early years development and the effectiveness of shared family reading, the removal of funding from the Book Start Baby scheme provides a gratuitous example of an intervention which prioritises a limited short-term saving and which sees provision in NI fall far short of other parts of the UK. | Part funding for the BookStart programme was introduced in 2020-21 given the reduced access to books for babies due to libraries being closed as a result of Covid-19 restrictions. Whilst the Department recognises the potential negative impact of the cessation of part funding of BookStart on children in their first year, the impact is mitigated by the availability of free books in local library services and support provided by health visitors. |
| The Book Start Baby scheme should be reinstated to ensure that access to learning resources and parent support is equitable across the constituent parts of the UK. | |
| The Department's assessment of impact has failed to include the cessation of the Book Start programme which will have a major negative impact upon the youngest children. In failing to include this age category within the EQIA the adverse impact upon this age group has not been identified or adequately assessed. | |
| We recommend the Department focusses on early and appropriate interventions. These can prevent learning difficulties from developing. | The Department recognises the benefits of early interventions however it must find a balance between adequately funding all its statutory functions and its budget. |

Engage

| Issue | DE Response and proposed actions |
|---|---|
| Cuts to the Engage programme has led to teachers losing their posts creating uncertainty for schools and limiting their ability to plan for the incoming school year. | The Permanent Secretary has set out very clearly, his rationale for reductions to budgets and in some cases, the stopping of some programmes. |

| Issue | DE Response and proposed actions |
|---|---|
| <p>We do not agree with the assessment that children with SEND will experience minor impacts as a result of discontinuation of the Engage programme. Research indicates that children with SEND were disproportionately and negatively impacted by the implementation of measures such as school closures and online learning during the Covid pandemic.</p> | <p>Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded.</p> |
| <p>Evidence shows that children from Traveller, Roma and newcomer backgrounds experienced particularly significant learning loss as a result of measures implemented during the pandemic, indicating that children from these groups may be disproportionately impacted by withdrawal of the Engage programme.</p> | <p>The Engage Programme was put in place to offset the impact of the pandemic on children's learning. It was always considered to be a short term programme.</p> |
| <p>Engage Programme provides much needed support and respite to LGBTQIA young people . If the Department expects that some of this support may be provided by the Community and Voluntary Sector, there are challenges in providing services to minors without parent/carer permission, which could be problematic for an LGBTQIA child or young person. We believe that this presents greater challenges for LGBTQIA children and young people in rural communities.</p> | |
| <p>Under the category of "marital status", consideration has been given to the marital status of the children and not their parents/carers. There is a need to consider the impact on lone parents and the impact that reductions to programmes such as Engage given the clear evidence about poverty rates for children in lone parent families.</p> | |
| <p>We recognise the work that the Department of Education have already completed around Gender based Violence. The impact of the cut will adversely affect female pupils. Due to our involvement with the Department of Education in Violence against Women and Girls, we know the life changing support and intervention these services can bring, especially through support programmes such as the Engage programme.</p> | |
| <p>We are concerned that the proposed cuts will have an impact on children with additional needs. Children who require additional support, post pandemic received additional support through the Engage programme.</p> | |

| Issue | DE Response and proposed actions |
|---|----------------------------------|
| This enabled children who often are not captured on the SEN census data to improve core skills in Literacy and Numeracy. | |
| Removal of Engage represents a major blow to the Irish-medium sector as the impact of the pandemic was felt more acutely by IM pupils. | |
| The categories of race, age and disability will experience major, rather than minor, negative impacts from budget reductions to Engage. | |
| We believe that rather than minor negative impact there will also be major negative impact from budget reductions to Engage Programme. | |
| The EQIA states that gender will “experience minor negative impacts from budget reductions to Engage Programme.” We disagree and suggest that reducing/removing funding from this programme will significantly impact on women as those most likely to be responsible for household budgets and children’s costs. | |
| The Department’s assessment is that Religious Belief and Political Opinion groups will experience “minor negative” impacts despite the education sector being established exactly around these particular groups. Further assessment is required around the no. of pupils entitled to Free School meals within the controlled and maintained sectors to identify the massive impact that the cancellation of core programme like engage, happy healthy minds and holiday hunger will have to establish if political opinion has a direct correlation to an impact of these policies decisions. It is unacceptable to dismiss this as minor. | |
| We are concerned that, with regards to sexual orientation, the EQIA has determined that “this category will experience minor negative impacts from budget reductions to School Holiday Food Grant, Healthy Happy Minds, Engage Programme, Extended Schools, and North Belfast Principals Support Programme.” There is no explanation as to what these minor impacts will be, nor what data has been analysed to determine what impacts this Section 75 grouping will experience. | |
| Concerns on Disability - We disagree with the Department’s assessment that this group will only incur minor impact from the reduction of the Engage programme. | |

| Issue | DE Response and proposed actions |
|---|--|
| <p>The 'how do I deal with school refusal??' article was the most read in Northern Ireland last year, with 961 parents and carers accessing it and articles within the SEND category accounted for 22% of page views with the top issue being mental health support at 25%. This evidence, combined with reports from our local services and staff would lead us to question whether the Department has fully considered the impact of cuts like the Engage programme, for those with statemented needs who are also struggling with mental health and school-based anxiety after the impact of Covid-19?</p> | |
| <p>The impact of ceasing the 'Engage' programme 'is likely to be felt more in the Catholic sector as there are more Catholic school children overall and a higher proportion of them are in receipt of FSM'. DE suggests accessing TSN and Extended Schools programmes could mitigate the removal of 'Engage'. However, this would seem unrealistic given the potential for TSN and Extended Schools programmes to be similarly adversely affected by budget cuts.</p> | <p>The Permanent Secretary has very clearly set out his rationale for reductions to budgets and in some cases, the cessation of some programmes.</p> <p>Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded.</p> <p>The Engage Programme was put in place to offset the impact of the pandemic on children's learning. It was always considered to be a short term programme.</p> <p>The Extended Schools Programme budget was increased by £5.8m between interim and final budget. Having carefully considered all of the principles in the Secretary of State's decision-making guidance, the Permanent Secretary decided not to proceed with the full scale of proposed cuts to Extended Schools. Having considered the scale and cumulative impact of the proposed cuts, which represent a major change to long standing Ministerial programmes and policies, it is the Permanent Secretary's view that such a</p> |

| Issue | DE Response and proposed actions |
|--|--|
| | decision should be taken by a Minister, not a Permanent Secretary. |
| The TSN Fund has been identified as a mitigation against the cessation of Engage, but evidence indicates that schools do not report to the Department how TSN funding is spent therefore there is no data to indicate that Section 75 categories benefit from this fund. (Northern Ireland Audit Office, 2021; NICCY, 2017). | <p>The TSN Planner is being updated by schools annually.</p> <p>Whilst completion rates are not as high as they should be, there is sufficient evidence available to illustrate very comprehensively, how TSN funds are used and how they are supporting children's learning, including Section 75 categories.</p> <p>The Department plans to publish details of the TSN Plans 2022-23 in Autumn 2023.</p> |
| There is no data breakdown of children who were receiving support from the programmes that have ended such as School Holiday Food Grants, Engage and Healthy Happy Minds therefore it is difficult to assess the full impact. | The Engage Planner was updated by schools in each year of the Engage programme including a breakdown of pupils that schools had identified as in need of support. This is summarised in the programme's Equality Screening document which can be found at: Equality Screening - Discontinuation of the Engage III programme at the end of 2022 23 financial year.pdf (education-ni.gov.uk) . |

Extended Schools

| Issue | DE Response and proposed actions |
|---|---|
| Any cuts to the Extended Schools programme will be felt the most by disadvantaged and vulnerable children and young people. It means a reduction in breakfast clubs, homework clubs, sport, art, drama and ICT, as well as programmes for parents and families. | The Department notes these issues. |
| We believe that the Department should reinstate the full budget for the Extended Schools programme. | The Permanent Secretary has very clearly set out his rationale for reductions to budgets and in some cases, the cessation of some programmes. |
| Extended Schools Programme provides much needed support and respite to LGBTQIA young people . If the Department expects that some | Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very |

| Issue | DE Response and proposed actions |
|--|--|
| <p>of this support may be provided by the Community and Voluntary Sector, there are challenges in providing services to minors without parent/carer permission, which could be problematic for an LGBTQIA child or young person. We believe that this presents greater challenges for LGBTQIA children and young people in rural communities.</p> | <p>challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded.</p> |
| <p>Under the category of "marital status", consideration has been given to the marital status of the children and not their parents/carers. There is a need to consider the impact on lone parents and the impact that reductions to programmes such as Extended Schools given the clear evidence about poverty rates for children in lone parent families.</p> | <p>The Extended Schools Programme budget was increased by £5.8m between interim and final budget. Having carefully considered all of the principles in the Secretary of State's decision-making guidance, the Permanent Secretary decided not to cut funding to proceed with the full scale of proposed cuts to Extended Schools. Having considered the scale and cumulative impact of the proposed cuts, which represent a major change to long standing Ministerial programmes and policies, it is the Permanent Secretary's view that such a decision should be taken by a Minister, not a Permanent Secretary.</p> |
| <p>The ending or reduction of Extended school and Early years programmes will have a major impact on the Catholic family of schools. We would therefore disagree with the DE assessment that budget cuts in these areas would have 'minor negative impacts' in the Section 75 category of Religious Belief.</p> | |
| <p>The categories of race, age and disability will experience major, rather than minor, negative impacts from budget reductions to Extended Schools.</p> | |
| <p>Given that schemes such as the Extended Schools are means tested, they are not used by all children, but by children who come from low income households. While those children may themselves be split roughly equally in terms of gender, the impact on their parents must be considered, particularly as households headed by women, especially lone parent families, are more likely to qualify for this scheme.</p> | |
| <p>We believe that rather than minor negative impact there will also be major negative impact from budget reductions to Extended Schools.</p> | |
| <p>Whilst we appreciate that the Department have since reversed a number of decisions such as the extent to the cuts to the Extended schools programme, we believe that a reduction in these kind of 'wrap around' services offered through schools will have a negative impact on women as this will directly impact the number of women who are able to access</p> | |

| Issue | DE Response and proposed actions |
|---|----------------------------------|
| <p>full-time work. This is particularly true of parents from low-income backgrounds, who may rely on heavily subsidised breakfast clubs and after schools clubs to access full-time employment.</p> | |
| <p>The EQIA states that gender will “experience minor negative impacts from budget reductions to Extended Schools.” We disagree and suggest that reducing/removing funding from this programme will significantly impact on women as those most likely to be responsible for household budgets and children’s costs.</p> | |
| <p>Concerns about Race - children from minority background - The Department rightly concludes that this category will experience major negative impacts from budget reductions to School Holiday Food Grants but we disagree that this category will also experience minor negative impacts from budget reductions to Healthy Happy Minds, Engage Programme, Extended Schools, and North Belfast Principals Support Programme. Insight into how the Department differentiates major from minor negative impacts would be useful, particularly where a lack of data is noted within the impact assessment.</p> | |

Mental Health

| Issue | DE Response and proposed actions |
|---|---|
| <p>Concerns regarding the reduction in mental health services for young people, including Engage and Happy Healthy Minds.</p> | <p>The Department notes these concerns.</p> <p>The Department provides specific funding to address poor mental health, including through REACH (schools-based) and FLARE (youth-based) programmes aimed at developing coping strategies and building resilience. In recognition of the mental health needs of young people, the Department has also worked closely with SEUPB and the responsible ROI Department, to secure significant PeacePlus investment to address Young People's Mental Health and Wellbeing- the application call to provide these services is currently open.</p> |

| Issue | DE Response and proposed actions |
|---|---|
| | <p>As part of the equality screening, a number of mitigations were listed, including other supports available to children and young people through GP's, PHA, voluntary and community bodies as well as the projects that are continuing under the EHWB framework.</p> |
| <p>Cutting funding for Happy Healthy Minds will hit the most disadvantaged and vulnerable children hardest.</p> | <p>The Department recognises that the removal of Happy Healthy Minds will impact the children.</p> <p>As part of the equality screening a number of mitigations were listed, including other supports available to children and young people through GPs, voluntary and community bodies as well as the projects that are continuing under the EHWB framework. Counselling for all ages is also currently being considered as part of the evaluation for post primary counselling.</p> |
| <p>Cessation of programmes including Engage, Healthy Happy Minds and North Belfast Primary Principals Support Programme will affect children and families with multiple identities who may have been supported by a number of different programmes. The mitigations in section 7 of the consultation consider each programme in isolation only.</p> | <p>As part of the equality screening a number of mitigations were listed, including other supports available to children and young people through GP's, voluntary and community bodies as well as the projects that are continuing under the EHWB framework. Counselling for all ages is also currently being considered as part of the evaluation for post primary counselling. Multiple S75 categories were considered as part of the S75 screening process however the Department was limited in terms of other funding options to mitigate the impact of budget cuts.</p> |
| <p>Limited capacity in schools will have significant impact on mitigation strategies. For example, removal of support programmes including (but not limited to) Engage and Healthy Happy Minds should be considered in the context of increasing concerns around children's mental health.</p> | <p>EHWB is being addressed across Education and Health under the EHWB Framework launched in February 2021. The remaining two programmes of support in the implementation plan are commencing from Sept 2023.</p> |

| Issue | DE Response and proposed actions |
|---|--|
| The categories of race, age and disability will experience major, rather than minor, negative impacts from budget reductions to Healthy Happy Minds. | As part of the equality screening a number of mitigations were listed, including other supports available to children and young people through GPs, voluntary and community bodies as well as the projects that are continuing under the EHWB framework. Counselling for all ages is also currently being considered as part of the evaluation for post primary counselling. |
| Healthy Happy Minds and other service cuts that are targeting disadvantaged children are compounded for children and young people in Section 75 groups in rural communities as they must travel greater distances to access alternative provision. | DE cannot respond on cuts to other services and decisions that have been made. |
| DE suggests that the removal or reduction of programmes such as 'Healthy Happy Minds' could be mitigated by schools accessing 'emotional health and wellbeing support for children and young people through the voluntary and community sector'. DE also suggest 'support can be accessed directly through health and social care services'. These suggestions are naïve given that the voluntary, community and health & social care sectors are in equally dire financial/budgetary circumstances and are unlikely to be able to cope with an increase in demand. | The Department recognises this issue. |
| Under 'gender' at 6.1 there is no reference to, or consideration of, potential impacts on transgender pupils, although research clearly shows that LGBT young people are at higher risk of experiencing mental health problems due to bullying, prejudice, discrimination and other factors. While transgender pupils make up a small proportion of the school population, withdrawal of programmes such as Healthy Happy Minds will potentially have a significant impact on pupils who identify as transgender. | As part of the equality screening process, a number of mitigations were listed, including other supports available to children and young people through GPs, PHA, voluntary and community bodies as well as the projects that are continuing under the EHWB framework. Healthy Happy Minds was a primary age pilot and consideration of counselling support for all school ages is being undertaken as part of the review of existing post primary counselling services, which remains available. The EHWB of all pupils is being addressed across Education and Health under the EHWB Framework launched in February 2021. The remaining two programmes of support in the implementation plan are commencing from September |

| Issue | DE Response and proposed actions |
|--|--|
| | 2023. |
| <p>We do not accept that: “Age-appropriate resilience building to help children and young people recognise issues relating to mental health and adopt coping mechanisms to manage their mental health.” can be a mitigation for the cut to Healthy Happy Minds which enabled access to counselling. Schools do access a range of other emotional health and well-being support through the VCSE, but cuts are also being imposed on Community & Voluntary Sector groups.</p> | <p>The supports provided in resilience building for our children and young people are evidenced based. DE cannot respond on other cuts across sectors.</p> |
| <p>We do not accept that support for emotional health & well-being available through GPs, CAMHS and Family Hubs can be considered a mitigation for the loss of Healthy Happy Minds due to the difficulty of accessing GP appointments, the long waiting list for CAMHS and the reliance of the hubs on community & voluntary sector organisations they refer on to; many community and voluntary sector organisations find themselves under pressure due to budget cuts affecting their funding.</p> | <p>DE cannot respond on cuts to other services and decisions that have been made.</p> |
| <p>Happy Healthy Minds provides much needed support and respite to LGBTQIA young people . If the Department expects that some of this support may be provided by the Community and Voluntary Sector, there are challenges in providing services to minors without parent/carer permission, which could be problematic for an LGBTQIA child or young person. We believe that this presents greater challenges for LGBTQIA children and young people in rural communities.</p> | <p>As part of the equality screening process, a number of mitigations were listed, including other supports available to children and young people through GPs, PHA, voluntary and community bodies as well as the projects that are continuing under the EHWP framework. Healthy Happy Minds was a primary age pilot and consideration of counselling support for all all school ages is being undertaken as part of the review of existing post primary counselling services, which remains available. The EHWP of all pupils is being addressed across Education and Health under the EHWP Framework launched in February 2021. The remaining two programmes of support in the implementation plan are commencing from Sept 2023.</p> |
| <p>We recognise the work that the Department of Education have already completed around Gender based Violence. The impact of the cut will adversely affect female pupils. Due to our involvement with the Department of Education in Violence against Women and Girls, we know</p> | <p>Other programmes on Domestic and Sexual Abuse have continued such as the Women’s Aid Helping Hands programme for Primary age pupils which is funded by DE and the Operation Encompass initiative. Healthy Happy</p> |

| Issue | DE Response and proposed actions |
|--|---|
| the life changing support and intervention these services can bring, especially through support programmes such as the Happy Healthy Minds programme. | Minds was a primary age pilot and consideration of counselling support for all school ages is being undertaken as part of the review of existing post-primary counselling services, which remains available. |
| We are concerned with the growing amounts of young people presenting with emotional health and well-being concerns. Healthy Happy Minds was a positive step in providing support and in building the resilience of the school population. | Healthy Happy Minds was a primary age pilot and consideration of counselling support for all school ages is being undertaken as part of the review of existing post primary counselling services, which remains available. The EHWB of all pupils is being addressed across Education and Health under the EHWB Framework launched in February 2021. The remaining two programmes of support in the implementation plan are commencing from September 2023. |
| Mitigate impacts by exploring training/ accreditation for school staff to deliver counselling/ support to pupils who need it in the absence of programmes such as Healthy Happy Minds. | The EHWB of all pupils is being addressed across Education and Health under the EHWB Framework launched in February 2021. The remaining two programmes of support in the implementation plan are commencing from September 2023. |
| LGBTQI+ young people are more likely to feel the impact of a loss of counselling services or schemes such as Healthy Happy Minds because of the continued prevalence of bullying around these issues and may rely fully on school-based support because their own home environment may not be fully supportive of their identity. This is a very significant impact and not a minor impact. | The equality impact assessment covers all S75 and others, the cessation impacts all primary age pupils. The screening process concluded the cessation would impact on all primary age children with the most significant equality impact being age and disability, others known to be impacted were listed as minor due to the proportional impact across these groups. |
| The existence of GPs and CAMHS services are not a substitute for Healthy Happy Minds, both because Healthy Happy Minds is intended to be preventative in nature, as opposed to be accessed only when problems occur, and because our current circumstances mean that they are not easily accessible; GP appointments are difficult to get in many places, and the waiting list for CAMHS is unacceptably long. | The Healthy Happy Minds pilot was a counselling/therapy support service for pupils referred who were deemed to need this specific one to one and at times group support. Preventative support and training is available to schools in the wider EHWB framework such as the Youth Service REACH programme, nurture, or through voluntary or community sector, as well as GPs and CAMHS as appropriate. |

| Issue | DE Response and proposed actions |
|---|---|
| <p>The EQIA states that gender will “experience minor negative impacts from budget reductions to Healthy Happy Minds”. We disagree and suggest that reducing/removing funding from this programme will significantly impact on women as those most likely to be responsible for household budgets and children’s costs.</p> | <p>The Permanent Secretary has set out very clearly, his rationale for reductions to budgets and in some cases, the stopping of some programmes. Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded.</p> |
| <p>There is no data breakdown of children who were receiving support from the programmes that have ended such as School Holiday Food Grants, Engage and Healthy Happy Minds therefore it is difficult to assess the full impact.</p> | <p>The Healthy Happy Minds equality screening process used data that was available, as a pilot and in light of Action Short of Strike data from schools was limited. The screening process concluded that cessation would impact on all primary age children with the most significant equality impact being age and disability, others known to be impacted were listed as minor due to the proportional impact across these groups.</p> |
| <p>The Department highlights CAMHS as a mitigation for the cessation of Healthy Happy Minds. Research from the office of Northern Ireland Commissioner for Children and Young People indicates that waiting lists for the service are at an all-time high (NICCY, 2023). There is no information provided about communication that the Department has had with DoH officials to conclude that CAMHS will provide the support needed from those groups identified by the assessment.</p> | <p>EHWB is being addressed across Education and Health under the EHWB Framework launched in February 2021. The remaining two programmes of support in the implementation plan are commencing from September 2023. The collective supports are intended to build resilience and provide early supports to reduce the likelihood of pupils reaching the need for crisis supports such as CAMHS.</p> |
| <p>We are concerned that, with regards to sexual orientation, the EQIA has determined that “this category will experience minor negative impacts from budget reductions to School Holiday Food Grant, Healthy Happy Minds, Engage Programme, Extended Schools, and North Belfast Principals Support Programme.” There is no explanation as to what these minor impacts will be, nor what data has been analysed to determine what impacts this Section 75 grouping will experience.</p> | <p>Healthy Happy Minds equality screening process used data that was available, as a pilot and in light of Action Short of Strike data from schools was limited. The assessment concluded the cessation would impact on all primary age with the most significant equality impact being age and disability, others known to be impacted were listed as minor due to the proportional impact across these groups.</p> |
| <p>The suggestion that the current mental health provisions by GPs and CAMHS is a viable mitigation and alternative for the ending of the Healthy</p> | <p>DE cannot respond to budget cuts and impacts in other sectors.</p> |

| Issue | DE Response and proposed actions |
|---|---|
| Happy Minds programme is wholly inadequate. These services are under immense pressure with patients experiencing limit access to GP Services and already unacceptably long waiting lists for CAMHS. | |
| Concerns about Race - children from minority background - The Department rightly concludes that this category will experience major negative impacts from budget reductions to School Holiday Food Grants but we disagree that this category will also experience minor negative impacts from budget reductions to Healthy Happy Minds, Engage Programme, Extended Schools, and North Belfast Principals Support Programme. Insight into how the Department differentiates major from minor negative impacts would be useful, particularly where a lack of data is noted within the impact assessment. | Healthy Happy Minds equality screening process used data that was available, as a pilot and in light of Action Short of Strike data from schools was limited. The assessment concluded that cessation would impact on all primary age and disability, others known to be impacted were listed as minor due to the proportional impact across these groups. |
| An indication of future aid and support for schools in securing counselling and therapeutic services, such as for the worst-impacted schools or schools with the most vulnerable children, would potentially be a step that would go further in providing confidence to schools struggling to cover the shortfall in provision caused by the cancellation of Healthy Happy Minds. It is probable however that such a decision would require future funding to be made available, such as through a Monitoring Round reallocation. We would like to recommend that such funds from a feasible reallocation go towards alleviating the impact of Healthy Happy Minds' cancellation on the most vulnerable children and schools. This would potentially help give vital relief to schools in the interim period where the Pilot is being evaluated and future provision is being discussed.' | The Department notes this recommendation and will consider it alongside all Educational pressures should additional funding become available. |
| Societal mental health and wellbeing issues in NI have a profound impact upon education, and service provision both in schools and in youth groups is being subject to deep and sudden cuts, when the operation of programmes such as Happy Healthy Minds have yet to be properly evaluated. | The budget for the Healthy Happy Minds pilot was provided through COVID funding from DoF. DE did not have the budget to continue this pilot once COVID funding ceased. The evaluation is being assessed along with the current support for post-primary counselling to consider future counselling needs for all school age pupils. Youth Budgets have been retained at 2022-23 levels and |

| Issue | DE Response and proposed actions |
|---|--|
| | youth services continue to include support for young people with mental health challenges. PeacePlus funding has also been secured for Youth Mental Health and Wellbeing to extend the provision of mental health support for young people. |
| Evaluation of the Happy Healthy Minds programme should be expedited to ensure that the interventions delivered have an evidence-base of positive outcomes, and to preclude ineffective programmes and those with potentially negative outcomes. Funding should be prioritised for early intervention and prevention programmes, and those that involve capacity building and wellbeing support for school staff. This should include the introduction of Emotional Wellbeing Teams in School, and further rollout of the EA's School Staff Wellbeing Project. | The evaluation of the Healthy Happy Minds pilot is being assessed along with the current support for post-primary counselling to consider future counselling needs for all school age pupils. The budget for the Healthy Happy Minds pilot was provided through COVID funding from DoF, DE did not have the budget to continue this pilot once COVID funding ceased. The EHWB Teams in School is commencing in September 2023, as is the EA's Being Well Doing Well project. The EA continue to provide Staff Wellbeing support. |

School Holiday Food Grant Payment (SHFGP)

| Issue | DE Response and proposed actions |
|--|--|
| The % of children overweight or obese are higher in deprived areas. There is concern that without SHFG payments, levels will rise. | The Department recognises the negative impact that the discontinuation of the SHFG scheme may have on a range of groups, including the potential impact on those children who are overweight or obese. The implications for these children are not explicitly referenced in the EQIA as they are not identified as a specific S75 group. However, the cross governmental efforts to tackle childhood obesity continue through other initiatives. |

| Issue | DE Response and proposed actions |
|--|--|
| <p>All children should have access to a healthy, nutritious meal during the holidays. Cutting funding for the scheme will add financial pressure to low-income families.</p> | <p>The Department recognises the negative impact that the discontinuation of the SHFG scheme may have on low-income families.</p> |
| <p>Schemes in Northern Ireland such as the SHFG scheme are crucial in tackling child poverty and bridging the gap of educational inequalities, whilst simultaneously allowing parents to become more economically active. There is a need for the urgent reinstatement of the SHFG scheme to mitigate against significant levels of food insecurity for women and children particularly at a time when food inflation is at a record high.</p> | <p>Since July 2020 additional ringfenced funding has been provided to enable DE to pay SHFG on behalf of the Executive. From April 2023 this additional ringfenced funding has ended and therefore SHFG can no longer be made. The Department recognises the important support the SHFG scheme has provided for low income families who are struggling financially, particularly with recent cost of living rises and realises the huge disappointment this will be for parents. It was therefore with great reluctance that the Department took the decision that SHFG would be discontinued.</p> |
| <p>The short-term savings which are made by cutting programmes to tackle educational disadvantage are likely to be dwarfed by the costs which will be generated in the long run. The removal of, or deep cuts to, schemes such as those to alleviate holiday hunger, period poverty and the high costs of school uniforms have a cumulative impact on groups which are already disadvantaged, in terms of their experience of education provision.</p> | |
| <p>The SHFG scheme, the Free Period Products scheme and support for school uniform costs are vital interventions recognising genuine needs in order to mitigate socio-economic barriers to participation in education. These schemes should be immediately reinstated or have full funding restored.</p> | |
| <p>The cuts to SHFG will have a major negative impact on women as 93% of lone parents in Northern Ireland are woman. Women as also those most likely to be responsible for household budgets and children's costs.</p> | <p>The Department recognises that the discontinuation of the SHFG will have a negative impact on a number of groups. This is recognised within the equality screening for the decision to discontinue the SHFG scheme (available at</p> |

| Issue | DE Response and proposed actions |
|---|--|
| | <p data-bbox="1223 236 2089 483">Equality and human rights policy screening - Discontinuation School Holiday Food Grant). This screening reflects that children were the core beneficiaries of the food funded through the SHFG grant. Nearly 55,000 families received the SHFG and it is acknowledged that the discontinuation of the SHFG scheme will have a wider negative impact on these families.</p> <p data-bbox="1223 528 2089 927">Since July 2020 additional ringfenced funding has been provided to enable DE to pay SHFG on behalf of the Executive. From April 2023 this additional ringfenced funding has ended and therefore SHFG can no longer be made. The Department recognises the important support the SHFG scheme has provided for low income families who are struggling financially, particularly with recent cost of living rises and realises the huge disappointment this will be for parents. It was therefore with great reluctance that the Department took the decision that SHFG would be discontinued.</p> |
| <p data-bbox="147 943 1200 1150">Given that schemes such as the SHFG scheme are means tested, they are not used by all children, but by children who come from low income households. While those children may themselves be split roughly equally in terms of gender, the impact on their parents must be considered, particularly as households headed by women, especially lone parent families, are more likely to qualify for this scheme.</p> | <p data-bbox="1223 943 2089 1118">The equality screening for the discontinuation of the SHFG scheme recognises the negative impact that the decision is likely to have on parents under the S75 category relating to those with dependents. This is identified as a being a major impact.</p> |
| <p data-bbox="147 1166 1200 1262">There is a higher percentage of pupils in Irish-medium education entitled to free school meals and who therefore will be disproportionately affected by cessation of SHFG.</p> | <p data-bbox="1223 1166 2089 1406">The Department recognises the negative impact that the discontinuation of the SHFG scheme may have on a range of groups, including the potential impact on those children who attend an Irish-medium school. Pupils that attend Irish-medium schools are considered in terms of the S75 categories into which they fall, but their school sectors/language are not S75 categories in themselves and</p> |

| Issue | DE Response and proposed actions |
|---|--|
| | so the impact on one school sector in comparison to others is not considered within an EQIA. |
| DE accepts that proposed budget reduction to the SHFG will have ‘major negative impacts’ on a number of groups within the Section 75 ‘Race’ category, namely Newcomer, Traveller and Roma communities. Although the raw numbers of children in these groups is relatively low in comparison to the whole school population, it continues to grow. And since a significant percentage of children in these groups attend Catholic schools and benefit from focused pastoral and educational programmes, we would view the proposed cuts as having a ‘major’ negative impact on these children. | The Department recognises the negative impact that the discontinuation of the SHFG scheme may have on low income families and these impacts are detailed in the equality screening published on the discontinuation of the SHFG scheme. The equality screening identifies that "traveller" pupils, including Roma pupils, are likely to be impacted significantly more by the discontinuation of the SHFG scheme than the average for all pupils. There is therefore a major impact identified under the racial group S75 category. Newcomer pupils fall within the racial groups based upon their ethnicity rather than newcomers being a separate racial group. The equality screening focuses on the groups within each S75 category and does not reference the school types that each pupil attends. |
| Under the category of "marital status", consideration has been given to the marital status of the children and not their parents/carers. There is a need to consider the impact on lone parents and the impact that reductions to programmes such as SHFG given the clear evidence about poverty rates for children in lone parent families. | The equality screening for the discontinuation of the SHFG scheme recognises the negative impact that the decision is likely to have on parents under the S75 category relating to those with dependents. This is identified as a being a major impact. |
| Assessments must include analysis of the specific policy proposals and the cumulative impacts of those proposals. For example, the EQIA notes that the end of the SHFG scheme will lead to ‘major negative impacts’. It does not elaborate on how this decision will affect young people, and the likely cumulative impact on children’s lives. | The Department recognises the negative impact that the discontinuation of the SHFG scheme may have on a range of groups and S75 categories. Further information on the potential impact of the discontinuation of the SHFG scheme can be found in the equality screening for this decision (Equality and human rights policy screening discontinuation school holiday food grant payment). |
| The removal of financial support through the SHFG scheme will negatively impact disabled, black, and traveller children and young people significantly more than is the case for all pupils. This adds to the | The Department recognises the negative impact that the discontinuation of the SHFG scheme may have on a range of groups and S75 categories as shown within the equality |

| Issue | DE Response and proposed actions |
|--|--|
| <p>cumulative disadvantage faced by these groups of children, which should not only be reflected in the Department’s EQIA but should also inform decision-making around how to prioritise limited resources. It is our strong contention, which is backed by all of the available evidence, that the SHFG scheme should be reinstated at the earliest possible opportunity.</p> | <p>screening for the decision to discontinue the SHFG scheme.</p> |
| <p>The Department’s assessment is that Religious Belief and Political Opinion groups will experience “minor negative” impacts despite the education sector being established exactly around these particular groups. Further assessment is required around the no. of pupils entitled to FSM within the controlled and maintained sectors to identify the massive impact that the cancellation of core programme like engage, happy healthy minds and holiday hunger will have to establish if political opinion has a direct correlation to an impact of these policies decisions. It is unacceptable to dismiss this as minor.</p> | <p>The Department recognises that the discontinuation of the SHFG will have a significant impact on a number of groups including some S75 categories. Further details are included within the equality screening on the discontinuation of the SHFG scheme (Equality and human rights policy screening discontinuation school holiday food grant payment). The screening analyses the impact of this decision by S75 category including the religion of pupils, however such a screening does not assess the impact by school sector.</p> |
| <p>We are concerned that, with regards to sexual orientation, the EQIA has determined that “this category will experience minor negative impacts from budget reductions to SHFG, Healthy Happy Minds, Engage Programme, Extended Schools, and North Belfast Principals Support Programme.” There is no explanation as to what these minor impacts will be, nor what data has been analysed to determine what impacts this Section 75 grouping will experience.</p> | <p>The Department recognises that the discontinuation of the SHFG will have an impact on a number of groups and these impacts are examined in more detail within the equality screening for the decision (Equality and human rights policy screening discontinuation school holiday food grant payment). The screening references that data on pupils’ sexual orientation is not collected within the school census. There is no data available that provides a sexual orientation breakdown for those entitled to free school meals. It is therefore not possible to draw conclusions as to whether those attending school who fall into this category would be disproportionately impacted by the removal of SHFG.</p> |
| <p>Section 6 acknowledges major negative impacts from budget reductions to SHFG in four of the Section 75 characteristics. However, its impact has not been referenced at all in the multiple identities assessment. We think that cessation of this grant will have a major negative impact on this group.</p> | <p>The Department recognises that the discontinuation of the SHFG scheme will have had a negative impact on a range of groups, including those that fall within more than one section 75 category.</p> |

| Issue | DE Response and proposed actions |
|---|---|
| <p>We gathered information on how cessation of SHFG would impact children, young people and their families. The young people wrote:</p> <ul style="list-style-type: none"> • ‘The decision to cut this financial support can impact children/young people/families as the reason they were on free school meals was because they couldn’t afford to buy or make lunch while in school. This decision will impact the people of the community as families will not have enough money to afford food therefore meaning they will skip meals and parents may not eat anything which is not healthy’; • ‘Some families may struggle to afford to maintain the food habits that their children have been previously introduced to, due to some jobs not working over the holidays, some parents may not be earning income. Also due to the recent cost of living crisis, this may become increasingly harder for parents to keep up’; • ‘It will affect how people function as they will be really hungry’; and ‘Less of everything again which is causing more stress to young people again.’” | <p>The Department recognises the negative impact that the discontinuation of the SHFG scheme may have on low income families and the important support the SHFG scheme has provided for families who are struggling financially, particularly with recent cost of living rises and realises the huge disappointment this will be for parents and young people. Further information on how this decision may impact various S75 groups is documented in the equality screening for this decision (Equality and human rights policy screening discontinuation school holiday food grant payment).</p> |
| <p>The Department, on 28 July 2023, published an Equality and Human Rights screening for the discontinuation of the SHFG payment scheme at the end of the 2022-23 financial year. This decision was first publicly trailed on 12 March 2023 as being considered by the Department, with a letter then issued to political party education spokespeople on 30 March 2023 confirming the grant would be discontinued. To consider, never mind actually make and implement a policy decision on this nature in March and then publish a screening document which is dated as having been screened on 18 July 2023, approved 26 July 2023 and published 28 July 2023 reflects a blatant disregard to both the spirit and purpose of the screening process and the equality duties from which it derives.</p> | <p>While the finalised equality screening document for the discontinuation of the SHFG scheme was published in July, the relevant data was taken fully into account when the decision was made in March.</p> |
| <p>Concerned by Part Eight of the Department’s Equality and Human Rights Screening of the discontinuation of the SHFG, which would seem to indicate that it was conducted several months after the decision was made and the impact was already being felt. From our perspective,</p> | <p>While the finalised equality screening document for the discontinuation of the SHFG scheme was published in July, the relevant data was taken fully into account when the decision was made in March.</p> |

| Issue | DE Response and proposed actions |
|---|---|
| retrospective screening for a decision of this magnitude - with respect to the impact on children – would suggest fundamental flaws in the Department’s decision-making processes surrounding the Budget 2023-24. | |
| FSM eligibility criteria is currently under review and at present some children who need this support are missing out. This requires consideration and assessment on Section 75 categories. | The Department is continuing to progress a review of FSM and UG eligibility criteria and the review is examining a range of options that would enable more pupils to access FSM and UG. The review is considering a number of options, including those that provide universal FSM to all pupils in certain year groups, those that raise the current income thresholds that apply to some means-tested eligibility criteria and options that are a hybrid of both. Decisions on any changes to the criteria will be for an incoming Education Minister, taking into account the current significant budgetary challenges facing the Department and the budgetary implications for future years. |
| We do not accept the Department’s analysis that the ending of the school holiday food grant can be mitigated by the availability of FSM in term time through a child’s school. | This comment is accepted and the mitigation will be removed from the final EQIA. It was not the Department's intention to imply that the impact of the discontinuation of the SHFG scheme would be fully mitigated by the continuing provision of free school meals during term time. Rather it was intended to explain that the free school meals service during term time was unaffected by the SHFG decision. However, it is accepted that it is unhelpful for this to have been articulated in the section intended for mitigating actions. |
| There is no data breakdown of children who were receiving support from the programmes that have ended such as SHFG, Engage and Healthy Happy Minds therefore it is difficult to assess the full impact. | Further data and analysis in relation to the discontinuation of the SHFG scheme can be found in the equality screening document for this decision (Equality and human rights policy screening discontinuation school holiday food grant payment). |

Other Programmes

| Issue | DE Response and proposed actions |
|---|---|
| <p>The School Sports programme targeted disadvantaged children and as they are less likely to be physically active, they will be impacted most by the cessation of funding which is a major health concern.</p> | <p>£90,000 was made available for the IFA and GAA to provide the Sports Programme until the end of May. The Permanent Secretary has very clearly set out his rationale for reductions to budgets and in some cases, the stopping of some programmes. Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded. The Department commissioned the ETI to undertake a thematic evaluation of PE provision in primary schools which was published on 7 November 2022.</p> |
| <p>The cessation of funding for the KS2 Sports Curriculum Programme that supports young people's physical and mental well being in a statutory setting is of great concern, especially for Section 75 Groups such as those from Areas of High Social Need, with a disability, race and gender. A recent report outlined that 52% of primary schools do not have a suitably qualified PE teacher and are not meeting the minimum recommendations by the Chief Medical Officer of two hours per week, we note that there is no reference to such studies in the data of Section 5. The Sport and Recreation Alliance, as well as local surveys from SportED and NI Sports are evidencing less young people are able to participate in sport due to the cost of living crisis. Section 75 groups are more likely to be adversely impacted by the removal of the relevant support programmes.</p> | <p>A practitioners insight group and an inter/cross-organisational Steering Group have been formed to take forward the policy response to the report's recommendations.</p> |
| <p>Promoting good relations - there is no mention in the document of the 50% cut to the shared education budget which will significantly impair work on school collaboration that does positively impact on good relations, as DE biennial reports to the NI Assembly have confirmed.</p> | <p>DE recognises the need to build on the success to date and rebuild and expand participation levels. Shared Education remains a priority for DE, and the Department has secured £2m for Shared Education mainstreaming in the 2023-24 financial year. An initial allocation of £1.121m to complete term 3 of the 2022-23 academic year has already been made to the EA, and the remaining balance of £879k has been allocated to support the first two terms of the 2023-24 academic year. Given the reduced budget for 2023-24,</p> |

| Issue | DE Response and proposed actions |
|---|---|
| <p>The work of the Department of Education has supported many aspects of Community Relations and Shared Education in Northern Ireland. This work has supported many vulnerable children in disadvantaged communities who face intergenerational trauma. CCEA is concerned the cuts will impact the holistic and collaborative support for children and young people in Northern Ireland moving forward and it would hinder the work that has been developed over many years under the direction of the Children’s Cooperation Act 2015.</p> | <p>members of the Mainstreaming Shared Education Oversight Group recognised that there will be a reduction in the number of settings and/or pupils involved and acknowledged the need for a more flexible approach for the partnerships use of the Shared Education funding models. DE will continue to engage with SEUPB in regard to the PEACE PLUS Shared Learning Together Programme, which will provide further opportunities for Shared Education activity for children and young people.</p> |
| <p>The Department’s equality screening for the provision of digital devices acknowledges that ‘children with multiple Section 75 characteristics are more likely to be selected for the programme as these groups have higher levels of educational underachievement and are more likely to require support to engage’. Yet, the pausing of this scheme is not specifically referenced within the department’s EQIA, either under ‘multiple identities’ or elsewhere.</p> | <p>More than 6,000 devices have been provided to 172 schools in Phases 1 and 2 of the scheme. Phase 3 of the Digital Devices Scheme was launched on 19 May 2023 and an additional 2,700 devices are available for distribution to 70 schools. This will take place from Sep 2023 onwards. That will utilise the remaining in-stock devices. Continuation of the programme is dependent upon additional capital budget.</p> |
| <p>The Department’s assessment of impact has failed to include the cessation of Digital Devices scheme therefore there has been no assessment of the impact upon Section 75 categories.</p> | <p>The Permanent Secretary has very clearly set out his rationale for reductions to budgets and in some cases, the stopping of some programmes. Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded.</p> |
| <p>Digital devices are essential to ensuring meaningful participation in education today, meaning that the removal of funding from the Digital Devices Scheme will have a devastating impact upon educational engagement and attainment for children and young people from disadvantaged backgrounds</p> | |
| <p>DE should reinstate funding for its digital devices programme as a matter of urgency to provide equitable access to online learning for all children and young people, irrespective of social background.</p> | |
| <p>While we recognise that there has not been a cut to the school uniform grant, we understand that the level of the grant will not be raised, and this is unsustainable. Already, the level of the grant in NI is below the rate in England and Wales and in Scotland, and also does not presently cover shoes.</p> | <p>The Department noted this comment, however it must find a balance between adequately funding all its statutory functions and its budget.</p> |

| Issue | DE Response and proposed actions |
|--|--|
| The EQIA states that gender will “experience minor negative impacts from budget reductions to North Belfast Principals Support Programme.” We disagree and suggest that reducing/removing funding from this programme will significantly impact on women as those most likely to be responsible for household budgets and children’s costs | The Permanent Secretary has set out very clearly, his rationale for reductions to budgets and in some cases, the stopping of some programmes. Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded. |
| A 40% cut to the free period products budget is going to have a disproportionate impact on women and girls, as well as on non-binary people and trans boys, covering two different Section 75 demographic, and this must be assessed by the Department’s EQIA. | The 40% budget reduction referred to is a reflection of two things: a reduction due to the very challenging budget provided by the Secretary of State; and schools not using their period dignity budget in the previous year. DE intends to conduct a survey with schools in 2023-24 to determine if the budget they have is sufficient for their pupil's needs and will review the budget needs in future years accordingly. |
| There is no reference to the cut to Period Dignity programme in the EQIA and how it will impact girls, especially girls entitled to Free School Meals. | |
| In respect of Gender the department has announced a reduction in the funding available to support period poverty. This appears to be omitted in the assessment of the impact of this budget on Gender. There is no assessment as to how these policies decision impact staff and your significantly female workforce. | The budget reduction referred to is a reflection of two things: a reduction due to the very challenging budget provided by the Secretary of State; and schools not using their period dignity budget in the previous year. DE intends to conduct a survey with schools in 2023-24 to determine if the budget they have is sufficient for their pupil's needs and will review the budget needs in future years accordingly. The Period Dignity scheme administered by DE / EA is for pupils only. |
| The substantial shortfall of funding to ‘A Fair Start’ Action Plan has not been included in the assessment. Children under five, boys and disadvantaged children including those with multiple identities, will experience the most severe adverse impact as a consequence however, this has not been identified or adequately assessed. | The Permanent Secretary has very clearly set out his rationale for reductions to budgets and in some cases, the stopping of some programmes. Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded. |
| It is profoundly regrettable that the consultation document takes no account of the impact of budget cuts on children and young people from socially disadvantaged backgrounds. The budget for Fair Start has been | The £20m / £21m referred to was the budget recommended by the Expert Panel in its report and consequently was an estimate of likely costs. It would be inaccurate to refer to this |

| Issue | DE Response and proposed actions |
|--|---|
| <p>reportedly cut from circa £20m to £2m, and, together with cuts in other Departments, this will have a potentially devastating and enduring impact on the life chances of children and young people from socially disadvantaged backgrounds.</p> | <p>as a reduction in budget. The Permanent Secretary has very clearly set out his rationale for reductions to budgets and in some cases, the stopping of some programmes. Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded.</p> |
| <p>We are very concerned about the recently reported substantial shortfall in funding to address educational underachievement, through the implementation of the ‘A Fair Start Action Plan’, and the impact of this for the most vulnerable pupils, including children with multiple identities. The reported shortfall in funding - an allocated £2.5m compared to an expected £21m for 2023-24 so far - will undoubtedly have considerable adverse impacts on children with multiple identities who are more likely to be disadvantaged by multiple barriers, including socio-economic disadvantage.</p> | |
| <p>Cuts to the Entitlement Framework will reduce the breadth of educational opportunity for children and young people in rural communities.</p> | <p>The budget reduction is a reflection of the very challenging budget provided by the Secretary of State. The level of funding for Area Learning Community coordinators has been maintained to support area based engagement and partnership working.</p> |
| <p>The Entitlement Framework supports school partnership across the controlled, maintained and integrated sectors. If T: BUC and Shared Education budgets are both being cut as well as the Entitlement Framework, then this will have an impact on shared education and inter-community relationships impacting children and young people of differing religious and political beliefs.</p> | |
| <p>By cutting funding to the Entitlement Framework budget, young people’s access to choice will be reduced. The multiple identities in Section 75 are more likely to be impacted and does not see how this risk is mitigated to improve equality of opportunity.</p> | |
| <p>No clear rationale is provided in the EQIA as to the basis for the budget decisions taken or how the impact on learners in relation to the removal of enterprise education support will be mitigated.</p> | <p>£96,000 was made available for Young Enterprise NI until the end of May 2023. The Permanent Secretary has set out very clearly, his rationale for reductions to budgets and in some cases, the stopping of some programmes. Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing,</p> |
| <p>There is likely to be a negative impact on young people in relation to the development of future skills for employment as a result of removal of funding for the Young Enterprise NI programme.</p> | |
| <p>Young people from areas of social disadvantage, as indicated by free</p> | |

| Issue | DE Response and proposed actions |
|---|---|
| school meals provision levels, may be disproportionately impacted by a removal in funding for the Young Enterprise NI programme. | school budgets have been largely safeguarded. |
| Young people from rural areas may be disproportionately impacted by a removal in funding for the Young Enterprise NI programme. | The Department acknowledges the significant contribution Young Enterprise NI has made to supporting and enhancing the delivery of the curriculum across many schools. Young people in schools will continue to be taught employability skills as part of learning for life and work in the statutory curriculum covering enterprise, entrepreneurship and financial capability. They will also continue to have the opportunity to study related qualifications at KS4 and post-16 such as business studies and economics. It is important to note that the programmes delivered by Young Enterprise NI do not replace the delivery of Enterprise and STEM subjects in the curriculum; rather they are designed to support and enhance them. Schools continue to be able to use their delegated budget to employ the services of any organisation to deliver curriculum enhancing activities. |
| We would recommend the ring-fencing of funding designed to reach the most marginalised in our society, and that includes young people who are in multiple section 75 categories | It should be noted that the Department's youth budget, which is ring-fenced, is allocated on the basis of a funding distribution mechanism which recognises disadvantage, with a specific element of the youth budget allocated for TSN. |

General

| Issue | DE Response and proposed actions |
|---|--|
| The Government should be providing more investment in public services. | The Department recognises the historic underfunding in the education sector and will continue to make the case for additional funding. |
| We do not accept that the Department has no data available or accessible, whether quantitative or qualitative to determine the impact of the overall budget in relation to religious belief, political opinion, gender or race. | The Department is committed to improving availability of data including in relation to Section 75 categories. |

| Issue | DE Response and proposed actions |
|--|----------------------------------|
| <p>The requirement on Public Authorities to have due regard for the different Section 75 categories has been in place for 25 years and the DE should make every effort to ensure that the relevant data is made available to help ensure informed decision making.</p> | |
| <p>We welcome that the Department has undertaken an EQIA on its draft budget, however we are disappointed by the lack of data and detailed analysis of potential impacts, including differential and cumulative impacts, of budget decisions for children and young people in particular, and by the failure to propose adequate mitigating measures.</p> | |
| <p>The following data should have also been considered:</p> <ul style="list-style-type: none"> • Gender Equality Strategy Expert Panel Report WPG NI COVID-19 Feminist Recovery Plan (2021). • WPG Primary Research Report: The Impact of COVID-19 on Women: Putting Women’s Voices at the Core. • The Consequences of the Cuts to Education for Children and Young People in Northern Ireland • Women’s Regional Consortium Research on Women’s Experiences of the Cost of Living Crisis in Northern Ireland. | |
| <p>It is our view that the breadth of the data used for this EQIA is incredibly limited and therefore limits the scope of the assessment of impacts and the necessary detail required for meaningful mitigations to be suggested. In addition to the data considered, the Department should have considered various research and resources available to them including:</p> <ul style="list-style-type: none"> • The Consequences of the Cuts to Education for Children and Young People in Northern Ireland, Fitzpatric et al. 2023 • Women’s Experiences of the Costs of Living Crisis in Northern Ireland, Fitzpatrick, Chapman & Harding 2023 • The Fair Start Report and the subsequent Programme Delivery & Progress Reports • Children’s Law Centre evidence to the UN Committee on the | |

| Issue | DE Response and proposed actions |
|---|--|
| <p>Rights of the Child, January 2023</p> <ul style="list-style-type: none"> • Gender Equality Strategy Expert Panel Report • Women’s Policy Group NI Covid-19 Feminist Recovery Plan (2021). | |
| <p>We recognise that the 2011 Census data has been referenced, however data which highlights particular area-based rather than regional deprivation statistics, particularly highlighting Neighbourhood Renewal Areas and the 20% most deprived Super Output Areas, should also be utilised in assessing needs and issues relating to Section 75 equality considerations.</p> | |
| <p>There should be particular attention paid to the ‘available data’ which is considered in Section 75. Whilst the information relating to each group under Section 75 is difficult to assess on an area-based approach, deprivation and poverty are measured in most cases at geographical level. There is no mention of place-based Multiple Deprivation Measures or Poverty statistics in the literature, which is considered relevant in Sections 5 and 6, even though many of the areas with the highest levels of deprivation are witness to the most concentrated and most disproportionate levels of inequality in terms of the 9 groups impacted under Section 75.</p> | |
| <p>The lack of gender-disaggregated data hinders our ability to effectively advocate on behalf of women. 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.</p> | |
| <p>We recommend collecting data on the impact of lockdown, based on Prof. Barry Carpenter’s 5 Losses of Lockdown.</p> | |
| <p>The research referred to in the EQIA does not include the following 3 recent reports which are very relevant: IPSOS Independent Review of SEN Services and Processes, March 2023 NI Review of Childrens Social Care Services, June 2023 The Consequences of the Cuts to Education</p> | <p>The Ipsos Review has been included in the report.</p> |

| Issue | DE Response and proposed actions |
|--|--|
| for children and young people in NI, June 2023. | |
| We would also point to EA Youth Service Regional Assessment of Needs 2023 report, The EA's Regional Youth Development Plan 2020-23 and The DE Priorities for Youth' Strategy (2013) | It is worth noting that youth service provision is needs based and it is via an action in the Department's Youth Policy - Priorities for Youth - that results in a 3-yearly Regional Assessment of Needs (alongside local area based assessment of need), that is used to inform a Regional Youth Development Plan (and local area youth development plans). Its application beyond youth service, given it incorporates the views of children and young people alongside professional youth workers and other relevant research, is recognised. |
| There is a notable lack of data sources linked to Community and Voluntary Sector (CVS) organisations. Based on the information provided in the Department's EQIA, it is reasonable to assume that they failed to ask CVS organisations, beyond CARA Friend and Young Carers as noted, to provide any relevant data or evidence to inform their assessment of equality impacts. This contravenes best practice outlined in the ECNI's signposting guide, which clearly notes CVS organisations in the primary list of population level sources. It leaves a notable gap in data sources and consequently limits the extent to which the Department can describe the potential equality impacts of Budget 2023-24 decisions. An apparent failure to consider any data/evidence from the office of the Northern Ireland Commissioner for Children and Young People (NICCY) is also a significant omission. We believe strongly that the Department should have, at the very least, consulted those CVS organisations working directly with disadvantaged young people and their families, and gathered specific data and evidence to inform their assessment of equality impacts. The Department should also have consulted directly with children and young people who were likely to be impacted by savings decisions and used this data to inform their EQIA. This duty is | <p>The Department notes this concern, however the timing of the budget announcement (27 April 2023) meant that the Department had to work at pace to publish the consultation document.</p> <p>The Department is committed to improving availability of data including in relation to Section 75 categories.</p> |

| Issue | DE Response and proposed actions |
|---|--|
| <p>underpinned by Section 75, the Department's Equality Scheme and the rights of children to have their views heard and given due weight according to Article 12 of the UNCRC. Therefore, we strongly recommend that the Department conduct timely, focused engagement with these groups in order to address the clear omissions that are evident in their data sources.</p> | |
| <p>There has been no demonstrable attempt by the Department to analyse the data sources, as is outlined in the Equality Commission guidance. Further detail is required within the consultation document to outline what data from the sources listed has been used, and how this has been used to assess any differential impact across all of the section 75 categories.</p> | <p>This information is contained within the Equality and Human Rights Policy Screening For 2023/24 Resource Budget and has now also been included with Section 4 of this document.</p> |
| <p>We would urge the Department of Education to revisit their assessment of impacts and would seek that they share the data and evidence used to inform their decision in this regard.</p> | |
| <p>The EQIA is very high level and does not provide analysis in any kind of detail and developing this prior to any final decision making is vital.</p> <p>Presentation of the data would be very helpful, as it would provide a basis for decision making, and would also strengthen understanding among service providers and users on how decisions are being made enabling a clearer picture of how proposed allocations and cuts would impact specific S75 groups.</p> | <p>The timing of the budget announcement (27 April 2023) meant that the Department had to work at pace to publish the consultation document. As noted in the budget 2023-24 screening form, the Department recognised that further information was required to properly assess the impact of service reductions on S75 groups. S75 screenings were also published in support of this consultation.</p> |
| <p>It is not clear what DE proposals are being consulted on or what mitigations are being proposed. This would suggest that the evidence base for making the proposed changes is almost exclusively based on budgetary pressures rather than need; and that the full impact on Section 75 groups has not been considered in detail.</p> | |
| <p>Budgetary proposals should be developed within the context of the Executives statutory obligation under Section 28E of the NI Act (1998) to address poverty and disadvantage and to target resources based on objective need. Seek clarification that the Department has taken account of section 28E of 1998 Act when considering proposed cuts or changes to</p> | <p>The Department notes this comment, however it must find a balance between adequately funding all its statutory funding and its budget.</p> |

| Issue | DE Response and proposed actions |
|---|--|
| services. | |
| Public budgets should take account of areas of deprivation and those living within these areas as having complex needs that are currently under funded and resourced. | |
| The compounding impact of socio-economic deprivation should be highlighted as a standalone category, reflecting the potential impact this has across all the Section 75 groups. | |
| We would urge DE to consider the impact on socio-economically disadvantaged children and young people of the spending decisions taken for 2023-24. | |
| Multiple Cuts from all departments will impact on those most vulnerable in society including the communities that reside in Areas of Multiple Deprivation (as defined by NISRA). | |
| We would like to understand more clearly through this EQIA how the Department arrives at the conclusion that there will be only minor negative impacts and also what timescale is the Department using to calculate these assessments? | The Department notes this comment. |
| The consultation document does not provide detail regarding how ‘minor negative impact’ is differentiated from ‘major negative impact’ or how the conclusions regarding potential equality impacts are arrived at, in particular since the lack of data is quoted throughout section 6. | |
| The Department has characterised some impacts as “minor” without providing any explanations for why this may be the case. | |
| The Department has characterised some impacts as “minor” without providing any explanations for why this may be the case. | |
| The EQIA fails to demonstrate sufficient analysis of the potential gendered impacts of budget cuts and related policy changes. It is simplistic to assume that because there is a fairly even distribution of | The Department recognises that males continue to have lower levels of attainment than females, beginning in primary school and continuing throughout schooling to GCSE and A |

| Issue | DE Response and proposed actions |
|---|--|
| <p>males and females in the school population, males and females will not be differentially impacted by policy changes. Cuts to polices, including those targeted at reducing educational underachievement, will have differential impacts on boys and girls as studies show there is lower achievement among boys than girls.</p> | <p>Level". (Key Inequalities in Education and Communities) and that cuts to various programmes may have different impacts on different genders.</p> <p>The Permanent Secretary has very clearly set out his rationale for reductions to budgets and in some cases, the stopping of some programmes. Whilst this is regrettable, Budget 2023-24 is considered by DE to be the most pragmatic approach given the very challenging funding envelope provided by the Secretary of State and in so doing, school budgets have been largely safeguarded.</p> |
| <p>We do not agree with the finding of ‘minor negative impacts’ under the "age" category in relation to the listed programmes and note the exclusion of data to justify this finding.</p> | <p>The Department feels that it has correctly assessed the impact of these programmes. Further information on the North Belfast Principles Support programme can be found on the Departments web site (Equality and Human Rights Policy Screening for Cessation of the North Belfast Primary Principals Support Programme).</p> |
| <p>We understand that Permanent Secretaries of various Executive Departments in Northern Ireland have been put in a very difficult position by the current UK Secretary of State’s budgetary allocation. It is noted that the UNCRC recommended to the UK state to “withdraw the 2023-24 budget for Northern Ireland and fully consider the Equality and human rights implications of a new budget, taking all possible steps to mitigate any adverse impact on children’s rights before issuing a revised budget” . Despite this clear recommendation, no such action has been taken by the UK government which leaves these duties to protect and advocate for children’s rights in Northern Ireland to be fully implemented to local agencies and Departments.</p> | <p>The recommendation was specifically for the UK government.</p> |
| <p>The Department has a duty to uphold the rights of children and young people including the right to education, play, and for children to reach their full potential. We are therefore disappointed that the Department has made no reference to UNCRC in the consultation document and there is</p> | <p>The Northern Ireland Civil Service made training courses on 1) An Introduction to Children's Rights and 2) Child Rights Impact Assessments available to all staff via its online training portal in November 2022. The training was</p> |

| Issue | DE Response and proposed actions |
|---|---|
| <p>no evidence of the use of Child's Rights Impact Assessments alongside Section 75 categories. Recommends that the Department ensures Child's Rights Impact Assessments (CRIA) are utilised in the development of any future budget proposals ensuring children and young people are consulted throughout the process.</p> | <p>developed by the Northern Ireland Commissioner for Children and Young People. The Department of Education has included an action in its business plan to promote the CRIA training and will seek to develop wider use of CRIA.</p> |
| <p>Given the potential impact of the cuts to the 2023-24 budget, it is essential that all departments and agencies undertake CRIAs, in addition to EQIAs, to ensure that they have given due consideration as to how they will affect children and young people.</p> | |
| <p>The Department of Education should consider how their savings decisions will contribute to the disproportionate and cumulative disadvantage suffered by children as a result of the Budget. The Department should also undertake a Child Rights Impact Assessment, which includes more detailed intersectional analysis of budgetary decisions, to highlight areas where those experiencing multiple layers of inequality may be impacted.</p> | |
| <p>We have been disappointed that, despite the duties placed by the Children's Services Co-operation Act (CSCA) 2015 on all relevant departments and agencies to co-operate in the planning, commissioning and delivery of children's services, and the enabling power it provides to allow departments to pool resources to address crosscutting children's issues, co-operation in the delivery of services for children remains the exception rather than the rule. The pooling of resources is critical in ensuring that budgets are used most effectively to deliver positive outcomes for children.</p> | <p>The Department is currently working to establish a cross-Departmental Monitoring and Reporting Board to support the Children's Services Co-operation Act (CSCA) 2015 and Executive Children and Young People's Strategy, this will provide an opportunity to consider areas for co-operation and where resources may potentially be pooled.</p> |
| <p>The EQIA includes insufficient detail on, and analysis of, how this budget will impact children with multiple identities and the analysis that is provided at 6.1 lacks clarity.</p> | <p>The Department has attempted to summarise key impacts within the EQIA document however it is recognised that there is limited information on those with multiple identities.</p> <p>The Department is committed to improving availability of data in relation to Section 75 categories and multiply identities and will endeavour to provide more information in</p> |
| <p>We are not convinced that the cumulative impact on the multiple identities group of the withdrawal of several initiatives at the same time has been properly assessed.</p> | |

| Issue | DE Response and proposed actions |
|--|---|
| <p>There are 3 Section 75 categories – race, age and disability – where the information in this assessment seems to fall short in assessing the equality implications of the 2023-24 Budget. Additionally, we would highlight that for many children, they often represent multiple identities which often intertwine with numerous categories which can then intensify one individual’s experience of negative impacts.</p> | <p>future budget EQIA’s.</p> |
| <p>There is a need to breakdown the details of the groups of children as per the s75 categories who would be impacted by the various programmes or schemes that may be cut. (e.g. boys, girls and transgender within ‘gender’; different age bands within ‘age’ etc).</p> | |
| <p>The report only gives consideration in the category of "dependency" to children who are carers and children who are "looked after". There is also a need to acknowledge that all parents will be impacted by the budget cuts, especially those who have children that benefit from various schemes.</p> | |
| <p>There is a lack of transparency in the Department’s budgetary process.</p> | <p>Detail on the process followed by the Department has been included in section 2 and 3.</p> |
| <p>The document should include a comprehensive outline of all cuts being considered across all its programmes and stakeholders in order to enable fully informed responses to the consultation to be submitted.</p> | <p>The Department notes this concern and will consider this in future EQIA’s.</p> |
| <p>Without the full application of the planning procedures that occur during a typical budget process, 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 children and young people.</p> | <p>The Department notes this concern, however the timing of the budget announcement (27 April 2023) meant that the Department had to work at pace to publish the consultation document.</p> |
| <p>We recommend the Department revise the EQIA to present the impact of the full range of cuts and recommend a cumulative impact assessment to adequately assess the impact on children.</p> | <p>The Department notes this recommendation.</p> |
| <p>The distance of rural children in Section 75 groups from alternative provision and the additional strain on household budgets should have been considered in the multiple identities analysis.</p> | <p>The Departments Rural Needs Impact Assessment was published on 3 August 2023.</p> |

| Issue | DE Response and proposed actions |
|---|--|
| Concerns that DE has not undertaken a Rural Needs Impact Assessment of the potential funding cuts. | |
| Gender Budgeting requires government departments to analyse the different impact of a budget on people of different genders, starting as early in the budget cycle as possible, embedding it at all levels of policy- and budget-making. 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. Therefore, Budgets need reformulated with targeted measures to improve outcomes for women and girls. | The Department for Communities is the lead Department for the development of the Gender Equality Strategy which may include an action relating to gender budgeting. The Gender Equality Strategy will be subject to Executive approval. |
| Advocate immediate action to take a strategic, cross departmental comprehensive approach which examines the cumulative and overarching effects of the proposed cuts from across all NI departments. Alongside the Equality Impact Assessments being carried out by each individual department there must be an NI wide Equality Impact Assessment carried out to measure the impact on the most Vulnerable in Society particularly how it impacts on people living in Areas of Multiple Deprivation and how impacts might be mitigated by working collaboratively across Departments. | The Department notes this recommendation and recognises the need for Departments to work together to ensure impacts are properly understood. |
| The Department of Education, in partnership with other departments and duty bearers, must take steps to address the recommendations of the UN Committee on the Rights of the Child as part of this budget process. | |
| Budget cuts by the Department for Communities will compound the impact of DE cuts to schemes which benefit children and young people from households who rely on social security benefits for all or part of their income. | The Department notes this concern. |
| Mitigations presented in the EQIA are not mitigations, rather they are an assurance to develop mitigations, e.g.: will explore, will work with to manage. | The Department recognises the lack of mitigations that can be presented to address the proposed budget reductions. However, as the reason for reduction is lack of available budget there is no budget available to implement mitigations. |

| Issue | DE Response and proposed actions |
|---|---|
| We are disappointed by the lack of data and detailed analysis of potential impacts, including differential and cumulative impacts, of budget decisions for children and young people in particular, and by the failure to propose adequate mitigating measures. | Where mitigations can be provided, they have been included in the screening form. |
| Some decisions seem to have been made prior to the EQIA being conducted therefore it is difficult for DE to demonstrate appropriate consideration being given to potential equality impacts. | <p>There was an urgent need to provide clarity over the financial resources available to schools, the EA, other ALBs and relevant TPOs to enable them to plan from 1 April 2023.</p> <p>In view of the available budget, decisions could not be delayed until the full completion of an EQIA. In addition, the financial constraints are at a level that will significantly inhibit the Department's ability to reinstate funding, even where impacts are substantial. However, the EQIA will enable the Department to better assess the impacts of the budget; and provide valuable insight to inform future decisions should additional funding become available in future.</p> |
| The opportunity for additional consultation mechanisms would have been an important opportunity for DE to demonstrate that it is open to changing the current proposals. | The Department is operating in a constrained resource environment and needed to consult at pace, therefore could not facilitate additional consultation methods. The Department will revisit these recommendations when completing future EQIA's. |
| The short time frame during which this consultation is being carried out would have benefited immensely from opportunities to fully discuss the budget proposals and their implications. | |
| Additional consultation opportunities would have allowed impacted groupings to ask questions and seek clarifications. | |
| Holding consultations during popular holiday periods is not conducive to encouraging significant levels of feedback. | |
| We would strongly encourage early engagement, consultation, and collaboration with the stakeholders with regard to ongoing budgetary decisions, wherever possible. | |
| As this consultation does not engage any of the exemptions which allow for a reduced consultation period, the required 12 weeks consultation period should have been adhered to. The Department of Education are | The timing of the budget announcement (27 April 2023) meant that the Department had to work at pace to publish the consultation document as there was an urgent need to |

| Issue | DE Response and proposed actions |
|--|--|
| <p>therefore in clear breach of their own Equality Scheme. In addition to this, by only allowing 8 weeks to respond, this will inevitably exclude those that need additional time to respond, including those that will be most impacted by these budgetary decisions.</p> | <p>provide certainty of funding to business areas, ALBs, and organisations who depend on the funding provided to them by the Department. Therefore, under the DE Equality Scheme exceptional circumstances clause, the Department consulted over an eight week period.</p> |
| <p>In the current challenging environment we commend the Department for moving quickly to produce and consult on a EQIA on the impact of its proposed spending plans. However, we would express caution that the suggested timeframe for responding has not been conducive to securing a broad range of complete responses from those with particular insight and knowledge as to how these will impact upon the Department equality duties.</p> | <p>The Department will endeavour to provide a longer response time in future EQIA's.</p> |
| <p>We request clarification from DE about when screening in relation to budget preparations has actually taken place; if screening has taken place more than once; if it has also taken place in relation to each individual decision to reduce funding to a particular area; if an Equality Impact Assessment and subsequent consultation was considered earlier in the process than it actually occurred (and if it was considered earlier, why it did not take place). We ask these questions because within the timeline set out above, it is clear that the scope of the policy (i.e. DE's budget) was becoming clearer and that even in the earliest stages of the process there was an understanding within NICS generally, and DE specifically of the parameters of that policy and the potential cuts that DE and other departments were being asked to consider.</p> | <p>Following the budget announcement (27 April 2023), the screening of the 2023-24 Resource Budget was published on 15 June 2023. All screening documents are available on the Department's website. This includes screenings for the 2023-24 Resource Budget, for the cessation of programmes such as the SHFG scheme, Healthy Happy Minds, and the North Belfast Primaries Principals' Support Programme. The EQIA was then developed and published at pace following the screening.</p> |
| <p>Timing of budget setting and consultation - For organisations such as us in the NGO sector the uncertainty we face right into the new financial year, means that we cannot plan our services, staffing changes etc. in an efficient and effective manner. We are also forced into a situation where we are working outside our legal requirements and 'at risk' in terms of standard governance. In other parts of the UK our understanding is that budgets for the following financial year are set and communicated to organisations in November which then allows time for planning towards that budget. While 3 year budgets would make a huge positive difference,</p> | <p>The Department recognises the benefits of three year budgets however, in the absence of an Executive the Secretary of State has provided Departments with single year budgets.</p> |

| Issue | DE Response and proposed actions |
|--|---|
| at a bare minimum budgets should be set in the mid-Autumn. | |
| Schools should have three-year settlements. Single year allocations limit the strategic planning process for leaders, especially in the current harsh financial landscape. | |
| We would question how the Department has sought to engage the voices of children and young people through the consultation process. | The Department is operating in a constrained resource environment and needed to consult at pace, therefore could not facilitate additional consultation methods. |
| We would welcome details of any direct consultation with children and young people that the Department of Education has carried out, or intends to carry out on the EQIA Consultation Report on the 2023 – 24 Resource Budget, including details and copies of any child accessible versions of the EQIA Consultation Report on the 2023 – 24 Resource Budget which have or will be made available. These proposals directly affect children and young people on whom they differentially adversely impact and so children and young people must be consulted in relation to them. Failure to consult with children and young people is a breach of section 75 of the NI Act, Article 12 of the UNCRC and the Department of Education’s Equality Scheme. | The Department is operating in a constrained resource environment and needed to consult at pace, therefore could not facilitate additional consultation methods. The Department aims to be as accessible as possible and has noted the request for a child accessible version of the EQIA report. |
| We recognise the challenging circumstances surrounding the Budget, including the lack of a Northern Ireland Executive and Assembly. We have been a vocal critic of the 2023-24 Budget set by the NI Secretary of State on 27 April 2023. as we believe that it will result in cuts to funding and services that will disproportionately impact children, young people and their families. It should be noted that the damage caused by budgetary decisions is already being felt buy our most vulnerable and marginalised citizens. | The Department acknowledges the impact budget proposals will have on children, young people and their families. The Department must balance its statutory duties and responsibilities within its budgetary limits. |
| We are hugely concerned about the current crisis in the funding of education in Northern Ireland and the undeniable negative impact this will have on children and young people, particularly more vulnerable children. | The NI Block is facing considerable pressure and beyond, however the Department will continue to make the case for additional funding for the Educational Budget. |

| Issue | DE Response and proposed actions |
|---|--|
| <p>Schools and education service providers need consistent and sufficient core funding that is not dependent on in year allocations or one-off payment. Education in Northern should continue to be provided with sufficient funding that provides equity to our children and young people. Schools need stable budgets with a clear pay and price commitment. The impact of the underfunding on the lives of all children and young people is lived each day by school leaders and staff. There is a need for greater recognition of the significantly important role education plays in shaping, investing and protecting the future of our children and young people.</p> | |
| <p>We are opposed to the major cuts in public spending that are being imposed as a consequence of the budget set by the Secretary of State. Unless such cuts are reversed, identifying effective alternative policies or mitigating measures is very challenging.</p> | |
| <p>In the long term a children’s budgeting approach should be built into the NI Executive Budgeting process.</p> | <p>The NI Executive Budgeting Process is outside the remit of the Department.</p> |
| <p>The Department is at a clear disadvantage when planning financially for equality protections due to annual, short-term budget constraints. As most effective interventions require consistent, relationship-based and significant time investment- the ability to measure or pre-empt adverse impacts is severely reduced within this kind of decision-making model. We accept that this is a decision made by the current Secretary of State, and were signatories to a joint-letter led by Children’s Law Centre that stated clearly that this process is undermining children’s rights and equality in Northern Ireland and will cause irrefutable harm to this generation of children.</p> | <p>The Department notes this comment and will continue to make the case for additional funding for Education.</p> |
| <p>We also recommend that the Department ring-fences budget allocations that relate to early years services and programmes, in recognition of the fact that investment in early years is a previously established Executive priority. It is even more important that funding is ring-fenced for services designed to reach the most vulnerable children and young people - namely, those belonging to section 75 groups and especially those</p> | <p>The Department notes this recommendation. The emerging Executive Early Learning and Childcare Strategy will provide a range of proposals for consideration by an incoming Executive, which if supported will require investment in the early years.</p> |

| Issue | DE Response and proposed actions |
|---|--|
| occupying multiple section 75 characteristics. | There are a number of ring-fenced programmes in place including the Extended Schools Programme serving c450 schools each year, Full Service Programmes in North and West Belfast and a variety of geographical interventions across Northern Ireland. Whilst ring-fenced budgets have their place, there can also be downsides in terms of lack of flexibility, reporting and integration with other policies / programmes. We are happy to keep this issue under review. |
| We ask that DE's budget be withdrawn and similarly revised, in order to ensure that the Department meets its obligations under the UNCRC. | <p>The Department is not in a position to withdraw and revise the Budget.</p> <p>There was an urgent need to provide clarity over the financial resources available to schools, the EA, other ALBs and relevant TPOs to enable them to plan from 1 April 2023.</p> <p>In view of the available budget, decisions could not be delayed until the full completion of an EQIA. In addition, the financial constraints are at a level that will significantly inhibit the Department's ability to reinstate funding, even where impacts are substantial.</p> |
| We echo the UN Committee's call to withdraw the budget for Northern Ireland and fully consider the equality and human rights implications for a new budget, assessment of the cumulative adverse impact on children and young people arising from the decisions taken by NI departments. | The Department notes this comment, however this is outside the powers of the Department. |
| Aside from the issue of a lack of transparency and scrutiny, the limited information around decision-making processes also raises a number of questions around the re-allocation or re-prioritisation of resources, especially if additional funding were to be provided to the Department for 2023-24. For example, does the Department retain the discretion to restore the School Holiday Food Grant if it was deemed an immediate priority and there was appropriate levels of funding available? The Department should provide further detail, alongside their assessment of | The budget position for the Department continues to be extremely challenging due to the significant cost and demand pressures across the education landscape. Inescapable and statutory pressures (including actual and potential pay pressures) are currently estimated at c£300m. This is likely to lead to an overspend against Department's budget in 2023-2024. These pressures will therefore be prioritised should any additional funding be made available. |

| Issue | DE Response and proposed actions |
|--|---|
| potential options, so that respondents are able to provide constructive comments regarding mitigating actions. | The Department recognises the lack of mitigations that can be presented to address the proposed budget reductions. However, as the reason for reduction is lack of available budget there is no budget available to implement mitigations. Where mitigations can be provided, they have been included in the screening form. |
| There is a lack of detail in relation to how differential adverse impact will be monitored by the Department of Education. Details of monitoring arrangements provided within the EQIA are lacking. Further details are required of systems that will be implemented in relation to future monitoring of actual differential and adverse impacts of budget decisions on children's access to and participation in education. | The Department recognises the requirement to monitor actual impacts of budget decisions on the Section 75 groups and will continue to monitor the financial position and associated impacts as the year progresses. Specifically, the Resource Budget Equality Screening will be updated after each monitoring round throughout the year and if additional funding becomes available. |
| The document makes no mention of implications of budgetary cuts for the DE capital budget and capital investments as well as associated impact on children and young people across the Section 75 categories or compounding socioeconomic deprivation. | This EQIA relates to the 2023-24 Resource Budget only, the Capital budget will be taken forward separately. |
| DE should carefully consider alternative avenues for achieving necessary savings while minimising the negative impacts on children and young people. As an important first step, funding for SEN and the School Holiday Food Grant must be restored for 2023-24. The Happy Healthy Minds, Engage and Extended Schools programmes should all be prioritised, appropriate to the level of need and resources available. It is imperative to safeguard the rights of our most vulnerable and marginalised citizens, ensuring that their specific needs are adequately met in the context of wider social and economic forces that are causing families severe hardship. | The Department recognises the benefits of these programmes, however, must balance its statutory duties and responsibilities within its budgetary limits. |
| These cuts will fall hardest on children who are most at risk of educational disadvantage and will put progress on children's education back a generation. We acknowledge that this is neither a role public sector staff sought or want, and we welcome the fact that the Department has halted | The Department recognises the impact the budget proposals will have on all these categories. The EQIA has considered all section 75 groups in full. |

| Issue | DE Response and proposed actions |
|--|---|
| <p>proposed cuts to vital services like Sure Start. However, cuts continue to be made across all government departments, and it is children who could face the severest consequences as the cumulative impact of these cuts take hold.</p> | <p>The Department must balance its statutory duties and responsibilities within its budgetary limits.</p> |
| <p>It is impossible to manage or mitigate the impacts that these decisions will have on some of the most socially disadvantaged children and young people. The withdrawal of additional support for example the engage programme will have a catastrophic impact for an entire generation of young people. There is a direct correlation between disability and poverty. The impact that ending holiday hunger payments has had on families and their household budget has been huge.</p> | |
| <p>The crude and common way of making cuts is to target vulnerable “non statutory” provision in favour of “statutory” provision. This undermines the solid research basis by Nobel Laureate economist James J Heckman (and myriad others) that “The highest rate of return in early childhood development comes from investing as early as possible, from birth through age five, in disadvantaged families. There is academic consensus that the more we invest in our children, the earlier, the better. We do the opposite, against what we know is best for our children. Favouring what is “statutory” should be replaced with favouring what research consensus tells us is “right.”</p> | |
| <p>There is a lack of consideration of potential differential impacts for sub-categories within the wider category of ‘race’. While the EQIA does acknowledge that children from particular ethnic groups, including children from the Traveller community and Roma children, have some of the lowest levels of education attainment, there is no analysis of potential differential impacts of policy changes on these, or other, minority ethnic groups.</p> | |
| <p>The needs of children with disabilities, children from low-income families, or children from ethnic minority groups have not been addressed. These groups are all at risk of being disproportionately impacted by budget cuts, and it is important to collect data on their needs in order to develop</p> | |

| Issue | DE Response and proposed actions |
|---|--|
| effective mitigation strategies. | |
| <p>Race, minority ethnic and newcomer pupils - At school level, pupils from minority ethnic and newcomer backgrounds now represent 6.1% of the pupil population (DENI, 2023), an increase from 2.8% in 2012-13. In terms of the race characteristic or element of the equality impact assessment, it seems clear that if funding for newcomer pupil support and programmes is cut, in line with cuts to the Aggregated Schools budget, it will lead to a disproportionately higher adverse impact on newcomer pupils than other pupils.</p> | |
| <p>The impact of cuts upon minority ethnic communities in NI has been largely overlooked in general discussion of these policy changes. This is an inevitable feature of such groups having limited representation within political processes, compounded by the attenuation of political oversight around these cuts.</p> | |
| <p>In assessing the impact of funding reductions, the DE should take account of the high levels of disadvantage among particular minority ethnic and migrant groups and the disproportionate effects that cuts to services are likely to have on these groups. The Department should also recognise the interlinkages between these programmes and the risk that cuts to one area of service may affect families' ability to access and engage with other services.</p> | |
| <p>Many of the projects targeted for cuts, albeit with mitigations in some cases, fall on projects where early intervention pertains, such as: The Pathway Fund, Bright Start, Toybox, Book-Start-Baby, Extended Schools. The Permanent Secretary's stance (that such decisions should be taken by a Minister, not a Permanent Secretary) is nonetheless welcome as a temporary measure.</p> | <p>The Department recognises that some decisions are outside the lawful decision making power of officials and cannot be made in the absence of an appropriate decision maker.</p> <p>Having considered the scale and cumulative impact of these proposed cuts, which represent a major change to long standing Ministerial programmes and policies, it is the Permanent Secretary's view that such a decision should be taken by a Minister, not a Permanent Secretary.</p> |

| Issue | DE Response and proposed actions |
|--|--|
| <p>We can't afford severe social segregation in schools and educational settings. The budget takes no account of the severe social segregation in our education system. Our schools' system is the most socially segregated in the developed world. At an individual level, a child from a low-income household in a socially disadvantaged area does much better in school with a socially mixed intake. The same child attending a 'high poverty' school does much worse, always. The peer effect is vital. That tells us that socially mixed intakes is 'miles better' – as a policy response – than any amount of targeting-social-need or compensatory financing.</p> | <p>The Department notes this comment.</p> |
| <p>In the absence of direct ministerial authorisation for decisions, the Department of Education NI should seek clarification from the Secretary of State on how they should take account of the recommendations from the Committee on the Rights of the Child in its decision-making processes.</p> | <p>All decisions taken by the Department are within the power of the Senior Officials of the Department under the Northern Ireland (Executive Formation Etc.) Act 2022, amended by the Northern Ireland (Interim Arrangements) Act 2023.</p> |
| <p>The EQIA includes some decisions that have already been taken to reduce expenditure following the announcement of the budget for 2023-2024. It is important that DE is open minded to change its policy proposals, given that the Department has taken decisions prior to the EQIA being conducted. Equality scheme commitments include equality assessments (screening and EQIAs) being undertaken prior to policy decisions being taken while there is still the potential for the equality assessment to inform decisions.</p> | <p>The Department recognises the need to be open minded, however the financial constraints are at a level that will significantly inhibit the Department's ability to reinstate funding, even where impacts are substantial. The EQIA will enable the Department to better assess the impacts of the budget; and provide valuable insight to inform future decisions should additional funding become available in future.</p> |
| <p>The main mitigations identified in the EQIA focus on mitigating the impact of the budget more generally rather than mitigating specific impacts on people in particular Section 75 groups. The EQIA should set out the priorities for allocating any additional budget in terms of the inequalities it would mitigate.</p> | <p>The budget position for the Department continues to be extremely challenging due to the significant cost and demand pressures across the education landscape. Inescapable and statutory pressures (including actual and potential pay pressures) are currently estimated at c£300m. This is likely to lead to an overspend against the Department's budget in 2023-2024. These pressures will therefore be prioritised should any additional funding be made available.</p> |

| Issue | DE Response and proposed actions |
|---|--|
| It is unclear from the EQIA whether the redistribution of internal budgets across functions has been considered, in light of the equality impacts. | Departmental costs represent a small proportion of the Education budget and are mostly staffing related. As noted above, the Department has taken action to review and limit staffing numbers, including suppressing vacancies. Efforts have also been made to constrain other departmental expenditure. |
| We recommend that the Department undertakes a thorough, transparent and public review of its own spending and procurement processes to ensure that best value for money is truly being achieved. No details of the review of internal efficiencies are given, making it difficult for stakeholders to identify any additional possible efficiencies that could be made. | |
| Further consultation methods, such as meeting with officials, as included in DE equality scheme, is likely to facilitate more effective consultation with stakeholders. | The Department notes this recommendation. The timing of the budget announcement (27 April 2023) meant that the Department had to work at pace to publish the consultation document. |
| The Department should consider developing mitigation strategies to address the needs of children with disabilities, children from low-income families, and children from ethnic minority groups, | The Department notes this recommendation, however the Department can only operate within the limits of its budget in delivering its statutory duties. |
| Given that the majority of the current financial support for schools exploring the option of becoming Integrated, as well as for the different steps of the Transformation process, comes from an independent charity (the IEF) and its donors, it would be reasonable for DE to acknowledge this among the potential mitigating factors in relation to good relations, relating to both the 'religious belief' and 'political' categories (p. 19). Without the support from the IEF, there would be a considerable shortfall in the budget needed for implementation of key aspects of the Integrated Education Act (Northern Ireland) 2022 relating to meeting demand for Integrated Education. | The Department acknowledges this comment, however the mitigations relate to actions that can be taken by the Department. |
| Approximately 65% of schools in Northern Ireland do not have a PTA, and so we believe there is an opportunity to strengthen the school community and parent voice in the areas that do not currently have a PTA. Our projections estimate that a PTA in every school could deliver £127 million to support children in Northern Ireland over the next ten years. This could help provide vital funding for educational materials, breakfast clubs, winter | The Department notes this recommendation. |

| Issue | DE Response and proposed actions |
|---|---|
| coats, school uniform items, school trips, libraries, school renovation projects, minibuses and more. | |
| The EQIA should be transparent about the Department's budget decisions and how they will impact different groups of children. | The Department acknowledges this comment, budget decisions set out in Section 3 of this report will impact children and young people (section 5). |

List of Respondents

| |
|---|
| Action for Children NI |
| Association of School and College Leaders |
| British Association for Counselling and Psychotherapy (BACP) and Pure Mental |
| Catholic Schools' Trustee Service |
| Children in Northern Ireland |
| Children's Law Centre |
| Colin Neighbourhood Partnership |
| Comhairle na Gaelscolaíochta (CnAG) |
| Controlled Schools' Support Council |
| Divis Joint Development Committee |
| Early Years |
| Education Authority |
| Equality Commission NI |
| Fermanagh & Omagh District Council |
| First Housing Aid & Support Services |
| Governing Bodies Association |
| Greater Falls Neighbourhood Partnership |
| Integrated Education Fund |
| Mencap NI |
| Mid Ulster District Council |
| National Education Council |
| Northern Ireland Council for the Curriculum, Examinations and Assessment (CCEA) |
| Northern Ireland Sports Forum |
| Northern Ireland Women's Budget Group |
| Northern Ireland Commissioner for Children and Young People (NICCY) |
| Northern Ireland Council for Voluntary Action (NICVA) |
| Northern Ireland Public Service Alliance (NIPSA) |
| National Society for the Prevention of Cruelty to Children (NSPCC) |
| Parentkind |
| Queens University Belfast |
| Rural Community Network |

| |
|---|
| Save the Children |
| Sinn Fein |
| St Teresa's Nursery School |
| Stronger from the Start Infant Mental Health Alliance |
| Sure Start South Belfast |
| TinyLife |
| Transferor Representatives' Council |
| UNISON |
| West Belfast Partnership Board |
| Women's Regional Consortium |
| Women's Platform |
| Women's Policy Group NI |
| Young Enterprise Group |