

Briefing Note: Concerns regarding cumulative equality impacts of proposed Departmental Budget allocations for 2023-24

7 July 2023 (Updated: September 2023)

Executive Summary

- i. On 27 April 2023, the Secretary of State for Northern Ireland announced the 2023-24 Budget for Northern Ireland. The Budget provided £14.2 billion to be spent, meaning significant reductions across all Departmental budgets.
- ii. The Equality Commission has substantial concerns regarding the potential equality impacts of the 2023-24 Budget for Northern Ireland and how Departments propose to allocate their Budgets.
- iii. Based on its working assessment of 2023-24 Budget proposals for Northern Ireland, the Equality Commission is concerned that proposed funding decisions and allocations by Departments will lead to new or exacerbated inequalities for protected equality groups.
- iv. It is essential that budget allocations, even in difficult financial periods, serve to advance equality of opportunity for people from across the full range of equality categories, and do not lead to new or exacerbated inequalities. Where adverse impacts are identified, Departments should consider alternative proposals to mitigate differential negative equality impacts.
- v. With each Department allocating their reduced Budget separately and conducting separate and discrete considerations of potential equality impacts, there is potential that the cumulative adverse impacts of decisions are not being considered or mitigated. Proposals may combine to potentially lead to additional or further exacerbated inequalities for protected equality groups.
- vi. For example, while a range of equality groups will likely be adversely impacted by the Budget proposals, it appears from the information presented by Departments that when considered collectively, young people, older people, people with a disability, and women will be more likely to experience multiple adverse impacts across a range of budget

allocations decisions and may be at more risk of substantive cumulative disadvantage than others. Individuals with multiple identities may be even further disadvantaged.

- vii. It is also not clear from Department proposals if actions to tackle already known and persistent equality issues will be effectively progressed or resourced going forward – for example, with regards to providing appropriate, accessible and affordable childcare that delivers for children and those with caring responsibilities across a range of equality categories; or the design and delivery of the full range of equality and social strategies to advance equality for each of a range of equality groups. The Commission reiterates the importance of strategic, long-term, approaches to effectively tackle persistent inequalities.
- viii. There is a need for the Northern Ireland Civil Service collectively, and each originating Department, to analyse and consider the equality impacts of budget allocations and proposals in their full context. This should take into account the potential combined and cumulative adverse impacts of the proposals from across the range of Departments so that proposals, *individually* or *in combination*, do not lead to new or exacerbated inequalities for protected equality groups.
- ix. There also remains a need for all Departments to ensure a focus on identifying and tackling inequalities which arose, or were exacerbated by, the COVID-19 pandemic or the public policy response to it (for example, lost time in formally taught education or pre-school).

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1 Overview

- 1.1 The current cost of living crisis together with the significant reductions in Departmental budgets following the Secretary of State for Northern Ireland's announcement¹ of the 2023-24 Budget for Northern Ireland, has further underscored the need for greater awareness and consideration of the combined and cumulative impacts of public policy and related budgetary decisions.
- 1.2 This Commission has developed a working assessment of Departmental budget proposals. This assessment should not be read as a comprehensive analysis of all impacts that may be experienced by equality groups as a result of budgetary decisions, not least given the rapidly shifting environmental context surrounding departmental budget proposals, and new information arising.
- 1.3 This working briefing seeks to identify potential impacts on specific equality groups across the budget proposals from a number of government Departments². The briefing seeks to highlight potential cumulative impacts of Departmental budget proposals when considered collectively.
- 1.4 We call on Government and Departments to consider both individual and cumulative impacts of how they propose to allocate budgets, so that they can better identify and implement appropriate mitigating actions.
- 1.5 While predominately based on information presented in each Departmental EQIA, this working briefing also takes account of wider sources, including information presented in other organisation's responses to Departmental EQIAs. We are grateful to these organisations for their consideration.

2 Potential combined adverse impacts across Departmental Budget Proposals

- 2.1 Notwithstanding the lack of detail and clarity across Departmental Equality Impact Assessments (EQIAs), the Commission has

¹ [Northern Ireland Office](#) and [The Rt Hon Chris Heaton-Harris MP](#) (27 April 2023): [Northern Ireland Secretary announces 2023-24 Budget and contingency plans for governance](#) Department of Finance (27 April 2023): [Department of Finance statement on 2023/24 Northern Ireland Budget](#).

² For example, cuts to community transport for disabled people will impact on independent living, including access to employment, health facilities, sporting and cultural facilities etc.

concerns that there are potential **cumulative adverse impacts** when budget decisions across Government Departments are taken in combination.

- 2.2 For example, while a range of equality groups will likely be adversely impacted by the Budget proposals, it appears from the information presented by Departments that when considered collectively, young people, older people, people with a disability, and women will be more likely to experience multiple adverse impacts across a range of budget allocations decisions and may be at more risk of substantive cumulative disadvantage than others.
- 2.3 In the EQIAs issued by individual Departments, it appears that the combined and cumulative impact of budget decisions and proposals is not being considered. Proposals and mitigations therefore do not appear to take account of the full context into which individual proposals are being made. The Commission has highlighted this concern within our responses to the 2023-24 Budget EQIAs issued by Departments³.
- 2.4 In addition to the combined impacts of multiple decisions on any one group (e.g. young people), individuals may also experience further cumulative disadvantage due to a combination of factors across their multiple equality characteristics (e.g. young people with a disability). In general, EQIAs issued by individual Departments do not appear to consider how proposals might further impact on individuals due to their multiple equality characteristics (the interaction of factors impacting on individuals across more than one of their Section 75 categories such as sex / gender reassignment, race, disability, sexual orientation, political opinion, religious belief, age, and people with or without dependents).
- 2.5 Drawing together the information published across Departments, our working analysis of potential impact of the budget across the equality grounds is summarised below.
- 2.6 Our consideration is limited where information on differential impacts on specific equality groups was either not presented by Departments or not made clear. We do however point to the need generally for improved equality data and analysis. The Commission has provided separate commentary and advice regarding lack of data and clarity within our responses to Departmental EQIAs⁴.

³ For further details, see <https://www.equalityni.org/budget>

⁴ For further details, see <https://www.equalityni.org/budget>

Age

Young People

- 2.7 Young people are likely to experience a number of differential negative impacts from a range of budget proposals across Departments, most particularly related to education, health, and training and employment opportunities.
- 2.8 Department of Education (DE) analysis⁵ concludes that their proposals will result in a major impact on young people from budget reductions to School Holiday Food Grant, Education Authority (EA) Block Grant, Engage Programme and Healthy Happy Minds and minor negative impacts from budget reductions to Playboard NI Play Policy, Aggregated Schools Budget, and Extended Schools. Statutory organisations, such as NICCY, have disagreed with DE that reductions to budgets for these programmes will have only minor negative impacts, on children⁶.
- 2.9 The Commission has consistently called⁷ for actions to address inequalities in attainment in education, while also developing recommendation of benefit to all children in education.
- 2.10 Major impacts as a result of Budgetary decisions will likely be experienced by children with Special Educational Needs (SEN), many of whom will also be children with a disability. It has been reported⁸ that dedicated school staff to support pupils with special educational needs (SEN) in Northern Ireland has been cut by 50%, however this does not appear to have been highlighted nor considered within the Department's EQIA.
- 2.11 Other statutory bodies⁹ have highlighted a range of budgetary decisions that seemingly have not been captured in the EQIA and which will likely have negative impacts on young people, for example including but not limited to, reducing the budget to provide free period products by 40%; reducing the shared education budget by 50%; reducing Nurture funding from £70 million to £60 million; reductions to school sports funding; and the full extent of reductions

⁵ For further details, see page 13 DE EQIA ([education-ni.gov.uk](https://www.education-ni.gov.uk))

⁶ For further details, see <https://www.niccy.org/publications/>

⁷ The Commission has consistently advocated for actions to address inequalities in attainment in education, while also developing recommendation of benefit to all children in education. For further details, see <https://www.equalityni.org/Education/Policy>

⁸ [Schools' funding for special needs teachers cut in half - BBC News](https://www.bbc.com/news/education-60888888)

⁹ For example, see NICCY DE EQIA response at <https://www.niccy.org/publications/advice-on-the-department-of-education-draft-budget-egia-2023-24/>

in Fair Start funding. DE have highlighted that budgets will be reduced for the Belfast Wide Early Years Pilot under Fair Start¹⁰.

- 2.12 Academics from Ulster University and Queen’s University Belfast have also highlighted concerns related to the impact of the Budgetary decisions, stating that:

“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.”¹¹

- 2.13 Further, while DE have committed to not cut funding to 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 Schools¹², it is unclear the extent to which programmes will be funded, or indeed if funding will be in line with inflation to ensure no regression in service provision.

Illustration: Potential cumulative Impacts on Young People

Young people may face cumulative negative impacts as a result of proposed reductions in budgets that provide food during school holidays.

The impacts of reductions to the School Holiday Food Grant (DE) may also be further compounded by reductions in Core Grant funding (DoH) to organisations in the community and voluntary sector that also provide programmes in which food is provided.

Reductions to the Discretionary Support Scheme (DfC) which provides financial assistance to families may further compound this impact again, demonstrating the potential for cumulative negative impact from decisions taken across different Departments¹³.

¹¹ [The consequences of the cuts to education for children and young people in Northern Ireland — Queen's University Belfast \(qub.ac.uk\)](https://www.qub.ac.uk)

¹² For further details, see: [Department of Education protects funding for vulnerable children and young people | Department of Education \(education-ni.gov.uk\)](https://www.education-ni.gov.uk)

¹³ This example has been highlighted by organisations such as CiNI, stating “For example, Core Grant Funding supports organisations like CiNI, who provide food and activities for children entitled to Free School Meals during school holidays. The School Holiday Food Grant previously supported families to provide food for their children who are eligible for Free School Meals when they are not in school. As a result of the

- 2.14 Proposals to cut funding to groups across the community and voluntary sector (DoH) risk negative health impacts on young people e.g. organisations working to support young people’s mental health¹⁴. Cuts to organisations that provide mental health services must also be seen in the context of chronic historic under investment¹⁵.
- 2.15 Young people may also face negative impacts regarding employment as a result of a reduction in volume of youth apprenticeships and traineeships following cuts proposed by the Department of Economy, alongside cuts to further education and higher education budgets¹⁶.

Older People

- 2.16 Older people will likely face cumulative equality impacts arising from budgets proposals, most acutely from programmes and services delivered by Departments of Health, Infrastructure, and Communities.
- 2.17 While programmes to support people to live independently such as Supporting People, (Department for Communities) will have their funding retained at existing levels, cuts across services (for example, funding challenges on the administration of Universal Credit, and the potential closure of the Affordable Warmth Scheme to new applicants) will likely have differential and adverse impacts on older people¹⁷.
- 2.18 In relation to age and housing, ECNI have called for accessible accommodation, energy efficiency, and access to a comprehensive fuel-brokering scheme. The Commission continues to call for easy to

funding cuts arising from the Budget, families on the lowest incomes have less money to spend on food during school holidays and their children may have less opportunity to attend a programme where some food is provided due to reductions in services across other organisations. These families will also have less recourse to financial assistance through the Discretionary Support Scheme, all of which may exacerbate levels of food insecurity among young people across Northern Ireland leading to negative health outcomes.”

¹⁴ Without more specific information on the scale of cuts and which community and voluntary groups will be affected, it is difficult to substantively analyse their impact, however we would draw attention to the Commission’s response to the draft Mental Health Strategy for Northern Ireland 2021-2031. Within our response, we noted that Action 11 of the draft Strategy is to fully integrate the community and voluntary sector in mental health service delivery including the development of a protocol to make maximum use of the sector’s expertise. We highlighted that without funding not only will the Department of Health’s own services be reduced, but such cuts will put more pressure on voluntary, community and social enterprise organisations who deliver essential public services supported by the Department.

¹⁵ ['Still Waiting' - A Rights Based Review of Mental Health Services and Support for Children and Young People in Northern Ireland - NICCY](#)

¹⁶ See page 16 DfE EQIA [DfE EQIA \(economy-ni.gov.uk\)](#)

¹⁷ See pages 18, 22 & 23 of DfC EQIA [DfC EQIA \(communities-ni.gov.uk\)](#)

access adaptation services to ensure older people's independence in their own home¹⁸.

- 2.19 Department of Health budget proposals relating to services provided by the community voluntary sector; reductions to payments for Community Aids and Adaptations; and restrictions on domiciliary care packages, if implemented (should savings measures highlighted in their EQIA fail to yield the level of savings required), will likely impact negatively and differentially on older people¹⁹. For example, domiciliary care mainly services older populations (84% of clients are over 65)²⁰.
- 2.20 Reductions in the Department of Infrastructure's budget to areas such as public transport and community transport, if implemented, will likely have differential negative impacts on older people. As highlighted in the Department's analysis, "Older people, who normally make up approximately 20% of Metro passengers, 16% of NIR passengers and 13% of Ulsterbus passengers, and 57% of community transport users, require a service level to meet their normal daily needs which may include access to shops, friends and community facilities as well access to health and care services"²¹.
- 2.21 Older people are often likely to also experience additional challenges, such as living with a disability, demonstrating the possible cumulative impact on older people both in terms of decisions taken across different Departments, and in terms of older people with multiple identifies. In their response to DoH's EQIA, COPNI state: "Older people, often, share distinct health, social and economic commonalities. These include an increased frequency of a long term or life-limiting health conditions. A 2020 report by Public Health Ireland found that in Northern Ireland, for persons over 65, 44% of people were living with a disability or health-related limitations in activity and for those over 75, this figure increases to 57%"²².

¹⁸ For further details, see: www.equalityni.org/Age

¹⁹ See page 13 of DOH EQIA [DOH EQIA \(health-ni.gov.uk\)](https://www.health-ni.gov.uk)

²⁰ For further details, see: Domiciliary care services for adults in Northern Ireland 2022, Department of Health, 2022, available at: <https://www.health-ni.gov.uk/publications/domiciliary-care-services-adults-northern-ireland-2022> cited by COPNI in DOH EQIA Response, found at: <https://www.copni.org/publications>

²¹ See DfI EQIA [DfI EQIA \(infrastructure-ni.gov.uk\)](https://www.infrastructure-ni.gov.uk)

²² For further details, see: Ageing and Public Health – an overview of key statistics in Ireland and Northern Ireland, Institute of Public Health, 2020, available at: <https://publichealth.ie/wp-content/uploads/2020/04/20200416-AGEING-PUBLIC-HEALTH-MAIN.pdf> cited by COPNI in DOH EQIA Response, found at: <https://www.copni.org/publications>

Disability

- 2.22 People with a disability are likely to face adverse impacts arising from budget proposals across Departments²³.
- 2.23 The Department of Health have set out further proposals (should savings measures highlighted in their EQIA fail to yield the level of savings required) to reduce payments for support services provided by the Community and Voluntary Sector; a reduction in the amount of Community Aids and Adaptations to clients living in their own homes; a reduction in nursing and residential care placements; and restrictions of domiciliary care packages²⁴.
- 2.24 Such proposals, if enacted, would likely restrict by disabled people's full access to rights set out under the UN Convention on the Rights of Persons with Disabilities (UNCPRD) Article 19 – Living independently and being included in the community²⁵. The importance of making progress in this area has been highlighted in the Disability Strategy Expert Advisory Panel Report²⁶.

²³ The Commission has consistently called for actions to deliver disability law reform, raise awareness and tackle prejudice, promote participation in public and political life, remove access barriers, address key inequalities for disabled people, and advance independent living for people who are disabled. For further details, see <https://www.equalityni.org/Disability>

²⁴ See page 13 of DOH EQIA [DOH EQIA \(health-ni.gov.uk\)](https://www.health-ni.gov.uk)

²⁵ For further details, see: <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-19-living-independently-and-being-included-in-the-community.html>

²⁶ For further details, see: <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-disability-expert-advisory-panel-report.pdf>

Illustration: Potential cumulative Impacts on people with a Disability

Several decisions proposed by DfC have the potential to result in cumulative negative impacts on people with a disability, along with other equality groups.

For example, retention of Supporting People at existing levels of funding (not funding in line with inflation), reductions in budget to the Affordable Warmth Scheme, changes in administration of Universal Credit, reductions in Discretionary Support Scheme, and reductions to the NIHE budgets leading to longer delays in housing adaptations will all have a differential negative impact on disabled people²⁷.

Further, proposed reductions in the Department of Infrastructure's budget to areas such as public transport, road maintenance, and community transport will also likely have differential negative impacts on people living with a disability²⁸. On 3 July, DfI indicated in their final Budget allocations that Dial-a-Lift services and the Disability Action Transport Scheme are to be funded from 1 August 2023 only to 95% of the level allocated for April to July²⁹.

- 2.25 The reduction in funding for Departmental Core Grant Schemes (DoH) to community and voluntary sector organisations that provide services for people with a disability will likely have a significant impact. Community and voluntary sector organisations have highlighted³⁰ that cessation of Core Grant funding will have an adverse impact on disabled people and may undermine the ability of the Department to meet objectives outlined within the Department's own Equality Scheme.
- 2.26 As previously highlighted, children with SEN, many of whom will be children with a disability, are likely to be adversely impacted by budget decisions taken by the Department of Education, most specifically on reductions to dedicated school staff to support children with SEN that have been reported by other organisations³¹.

²⁷ See DfC EQIA [DfC EQIA \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk)

²⁸ See DfI EQIA [DfI EQIA \(infrastructure-ni.gov.uk\)](https://www.infrastructure-ni.gov.uk)

²⁹ For further details, see <https://www.infrastructure-ni.gov.uk/news/department-infrastructure-outlines-final-budget-allocations-2023-24>

³⁰ For further details, see [Disability Action Response to the Department of Health Budget Equality Impact Assessment | Disability Action Northern Ireland](#)

³¹ [Schools' funding for special needs teachers cut in half - BBC News](#)

- 2.27 DE analysis indicates that children with disability will experience major negative impacts from budget reductions to SEN, 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, and Extended Schools³².
- 2.28 Retention of funding at existing levels (e.g. not in line with inflation) for Labour Market Partnerships (LMP) delivered by Department for Communities may cause adverse impacts across Section 75 groups, especially in the context of the removal of European Social Fund (ESF) funding as *“LMPs not only help those seeking work, but they are also a critical intervention to help people with a disability or health condition to remain in work.”*³³
- 2.29 The Executive Office (TEO) cuts to arms-length bodies, such as the Equality Commission, also have the potential to differentially impact upon people with a disability as our discrimination advice and support is most often sought on the grounds of disability (50% of our enquiries)³⁴.
- 2.30 While not mentioned in DfC’s EQIA, we understand that the Department will not progress work to develop and implement a Disability Strategy. This will have widespread negative impacts of people with a disability.

³² See page 14 DE EQIA [DE EQIA \(education-ni.gov.uk\)](https://education-ni.gov.uk)

³³ See page 20 DfC EQIA [DfC EQIA \(communities-ni.gov.uk\)](https://communities-ni.gov.uk)

³⁴ See page 20 TEO EQIA [TEO EQIA \(executiveoffice-ni.gov.uk\)](https://executiveoffice-ni.gov.uk)

Potential Impact on Individuals³⁵: Disability

Ken lives with long-term physical mobility challenges. For Ken, being able to live as independently as possible is important. Previously, Ken benefited from a number of programmes enabling him to live independently, in accordance with his rights set out under the UN Convention (UNCPRD) Article 19 – Living independently and being included in the community.

However, the Budget proposals across various Departments have the potential to undermine Ken’s ability to live an independent life.

Possible actions by Department of Health in restricting domiciliary care packages may limit Ken from accessing the care he sometimes needs in his own home. This may be compounded by decisions taken by other Departments. For example, the Department for Communities have indicated that Supporting People, a programme aimed at enabling people to live independently, will only have funding retained at existing levels (not in line with inflation).

The cost-of-living crisis has impacted Ken, like many others. To continue to live comfortably in his own home, Ken was going to apply to the Affordable Warmth Scheme this year. Ken lives in an old house with poor insulation and had hoped the scheme may provide insulation or replace his single glazed windows. Ken is worried reductions in the Budget to the scheme will impact on if, and when, he will be able to access this essential support.

Proposed reductions by Department of Health to funding for support services provided by the community sector may also impact on Ken, who regularly attended events and used services in his local community. These events and services were important in ensuring Ken felt included and active within his community.

Ken travelled to events and services provided in his community using public or community transport, as he is unable to drive due to his disability. Department of Infrastructure have indicated reductions to budgets for both public and community transport and have only funded Dial-a-Lift services and the Disability Action Transport Scheme at 95% of existing levels, potentially making it more difficult for Ken to live independently and be included in the life of his community.

³⁵ This illustration shows how someone with a disability may experience a range of interconnecting and cumulative negative impacts from budget decisions taken across different Departments. This example is not comprehensive, and only highlights a small number of impacts that may be experienced by an individual as a result of Budget decisions.

Sex

Women

- 2.31 Women appear more likely to experience differential negative impacts from cumulative impacts of Departmental Budget proposals³⁶.
- 2.32 For example, reductions proposed by the Department of Education to School Holiday Food Grant, Healthy Happy Minds, Engage Programme, Extended Schools, and North Belfast Principals Support Programme have been assessed by the Department as having a negative impact on women. Insufficient information is provided within the EQIAs to form a view regarding funding implications for Childcare provision³⁷.
- 2.33 The Department of Health's proposed cuts to the community voluntary sector through the Core Grant Funding Scheme will likely have negative differential impacts on women given that multiple organisations providing advice, support, and refuge to women are likely to have funding cut³⁸.
- 2.34 Reductions in the budget to areas such as public transport will likely have differential negative impacts on women, according to the Department for Infrastructure's (DfI) own analysis³⁹, while TEO have highlighted cuts to programmes to end violence against women and girls (EVAWG)⁴⁰.
- 2.35 TEO cuts to arms-length bodies, such as ECNI, may differentially impact upon women. Discrimination advice and support is often sought on the grounds of sex (20% enquiries) particularly in relation to harassment and pregnancy/maternity⁴¹.
- 2.36 While not referenced in the EQIA, the Commission has noted press reports regarding proposed cuts to programmes that offer free period products in schools, along with training for teachers in

³⁶ The Commission has consistently called for action to advance gender equality across a range of interlinked areas: attitudes, education, employment, caring, public life, violence, healthcare, sport, social protection, law reform, including Gender Pay Gap Reporting Regulations, and strengthening institutional mechanisms. For further details see www.equalityni.org/genderpolicy

³⁷ See page 14 DE EQIA [DE EQIA \(education-ni.gov.uk\)](http://DE.EQIA(education-ni.gov.uk))

³⁸ [Women's Aid Federation NI takes to Westminster to fight 'perilous' impending funding cuts - The Irish News](#)

³⁹ See DfI EQIA [DfI EQIA \(infrastructure-ni.gov.uk\)](http://DfI.EQIA(infrastructure-ni.gov.uk)) (Women used grant funded Community Transport services in 2022-23 more than men, Dial-a-Lift (69%), the Disability Action Transport Scheme (61% of new members) and Shopmobility (58%))

⁴⁰ See pages 17 & 18 TEO EQIA [TEO EQIA \(executiveoffice-ni.gov.uk\)](http://TEO.EQIA(executiveoffice-ni.gov.uk))

⁴¹ See page 20 TEO EQIA [TEO EQIA \(executiveoffice-ni.gov.uk\)](http://TEO.EQIA(executiveoffice-ni.gov.uk))

primary and post-primary schools to support them in discussing issues around periods with their pupils⁴².

- 2.37 Cuts to Discretionary Support Grants will disproportionately impact women. Figures show that women make up 60% of claimants where an award of Discretionary Support is made⁴³.
- 2.38 Women may also be differentially negatively impacted by cuts to domiciliary care services (DoH), as the burden of care often disproportionately falls on women. Women make up over 60% of individuals providing care, and are more likely to leave the labour market due to caring responsibilities⁴⁴.

Race

- 2.39 TEO has highlighted the risk of funding cuts for the Minority Ethnic Development Fund which provides support for voluntary and community organisations working with and representing minority ethnic people and groups.
- 2.40 Additional impacts across the equality ground of race include specific risks to refugee and migrant women in relation to Ending Violence Against Women and Girls (EVAWG) funding⁴⁵, as well as differential negative impacts on minority ethnic children from Department of Education cuts to School Holiday Food Grants, Healthy Happy Minds, Engage Programme, Extended Schools, and North Belfast Principals Support Programme⁴⁶.
- 2.41 TEO have acknowledged that cuts to arm's length bodies will lead to some groups being differentially and more negatively impacted. Citing the Equality Commission, TEO have acknowledged that Travellers already experience significant disadvantage across all areas of life and government service provision⁴⁷.
- 2.42 Lack of investment in GP practices, highlighted by DoH, may result in differential negative impacts for minority ethnic groups. While the

⁴² [Money for schools to provide free period products cut by more than 40 per cent - The Irish News](#)

⁴³ See Section 4. WPG Response to DfC EQIA

⁴⁴ For further details, see: Department for Communities (2022). Family Resources Survey report 2020-2021, cited in <https://www.carersuk.org/media/rojegayo/a-new-deal-for-unpaid-carers-in-northern-ireland.pdf>

⁴⁵ See pages 17 & 18 TEO EQIA [TEO EQIA \(executiveoffice-ni.gov.uk\)](#)

⁴⁶ The Commission has consistently recommended actions to tackle prejudicial attitudes; to tackle racial violence and improve reporting; to promote values of acceptance and respect so as to improve good relations; and to increase representation in public life. This includes prioritising the reduction and elimination of racial violence through a range of actions including; addressing issues of under reporting; early intervention; improved operational response to hate crime and support for victims of racist hate crime. For further details, see: [RacialEquality_PolicySummary2014.pdf \(equalityni.org\)](#)

⁴⁷ See page 20 TEO EQIA [TEO EQIA \(executiveoffice-ni.gov.uk\)](#)

Departmental EQIA did not provide a detailed analysis, research suggests minority ethnic communities can experience significant challenges in accessing GP services (for example, language barriers). Budget decisions that limit investment in GP services may therefore have a differential negative impact on minority ethnic groups⁴⁸.

Other Grounds

- 2.43 In general, there is insufficient data on the impact of Budget cuts on other equality grounds, however reductions in funding to the Central Good Relations Fund (TEO), may have impacts across political and religious grounds, as well as impacting all groups in relation to promotion of respect, tolerance, inclusion. This has the potential to undermine good relations, as well as equality of opportunity⁴⁹.
- 2.44 We note within the Department for Communities' (DfC) EQIA the detrimental impact of the Budget on the numbers of new social homes that can be built through the Social Housing Development Programme in 2023-24. This may impact in a range of ways, for example the Commission has highlighted the need to address the longer waiting-list times for social housing experienced by households with a Catholic religion household reference person⁵⁰.
- 2.45 Many of the draft EQIA's assess there to be no impact of proposed budget cuts on the ground of sexual orientation⁵¹. The Commission has highlighted a range of policy recommendations to further equality of opportunity for people of different sexual orientations⁵², including an effective sexual orientation strategy. It is difficult for the Commission to assess the potential impact of any reductions in Government services and funding on this community without further data and information on proposed cuts. However, the lack of agreed resourcing⁵³ for the planned LGBTQI+ Strategy may impact on measures to tackle inequality and further equality in relation to people of different sexual orientations and trans people across a range of Executive Departments.

⁴⁸ For further details, see CDHN DOH EQIA response: <https://www.cdhn.org/consultation-responses>

⁴⁹ See pages 15 & 16 TEO EQIA [TEO EQIA \(executiveoffice-ni.gov.uk\)](https://www.executiveoffice-ni.gov.uk)

⁵⁰ For further details, see: www.equalityni.org/Housing/Policy <https://www.equalityni.org/Housing/Policy>

⁵¹ For example see page 24 of [DoH draft EqIA](#) and page 26 of [DfC draft EqIA](#)

⁵² See www.equalityni.org/SexualOrientation

⁵³ DfC (2023) [Draft Equality Impact Assessment Stage 1 Outcome Report](#), Appendix A pp. 88-89

Potential Impact on Individuals⁵⁴: Multiple Identities

Sarah is a 14-year-old girl, attending a mainstream secondary school. She comes from a household in which her parents are on Income Support. Sarah also has autism. Different Departmental Budgets may impact on Sarah in multiple ways.

As a young person in education, she no longer has access to the range of programmes she used to participate in through the Central Good Relations Fund and the Extended Schools programme. While DE have committed to not proceeding with “full scale” cuts to the Extended Schools programme, reductions in funding may still impact on young people like Sarah. The Extended Schools programme aims to improve levels of educational achievement by providing additional support.

Sarah already has significant challenges in participating in school due to her diagnosis of autism. Her family are worried about the impact of reducing budgets for dedicated school staff to support pupils with SEN by 50%, and what this might mean for the support she receives. Cuts to Core Grant funding by DoH to organisations providing mental health services means that she has less support should she require further support for her mental health.

Outside of school, because Sarah’s parents are on Income support, Sarah used to receive support through the School Holiday Food Grant, which was discontinued in April 2023. Community organisations working in Sarah’s community no longer have funding to provide services (DoH), meaning Sarah may not have enough to eat during the school holidays. Support such as the Discretionary Support Scheme (DfC) is no longer able to support her parents when they experience financial difficulties. Healthy diets are essential for young people’s development and a predictor of long-term, lifetime health.

While Sarah is only 14, she is starting to think about her life after school, and what sort of career or further education she may pursue. Reductions in volume of youth apprenticeships and traineeships following cuts proposed by the Department of Economy, alongside cuts to further education and higher education budgets, may limit the lifetime opportunities that are open to Sarah.

⁵⁴ This illustration shows how one person may, across multiple equality characteristics, experience a range of interconnecting and cumulative negative impacts from budget decisions taken across different Departments. This example is not comprehensive, and only highlights a small number of impacts that may be experienced by an individual as a result of Budget decisions. In this illustration, Sarah is covered under Section 75 grounds of Age, Sex, and Disability.

3 The need for improved Equality Data and Analysis

- 3.1 Within Northern Ireland data, there are longstanding issues regarding a lack of equality disaggregated data. The Equality Commission has long identified the need for robust equality data in Northern Ireland, both to enable good evidence-based policy making and to ensure effective compliance with the equality and good relations duties established by the Northern Ireland Act 1998. We have also highlighted both the lack of equality data generally, and the lack of data disaggregated by equality ground, that is available to policymakers in Northern Ireland.
- 3.2 The Commission continues to recommend that all key measures of Government - including across the Programme for Government and key strategies - should not only be tracked in aggregate but also across the full range of equality grounds.
- 3.3 There is a need for Government and Public Authorities to collect comprehensive equality data and to address key gaps in equality data, to not only identify equality impacts, but so that to public policy making and service delivery includes targeted actions to advance equality. It is essential that equality considerations are at the heart of public policy making and are informed by the specific needs of those experiencing inequalities.
- 3.4 We have recommended that the government in NI should adopt a systemic approach to produce disaggregated equality data which not only meets the specific needs of Northern Ireland but where possible is comparable with common international frameworks.
- 3.5 Further information is available at www.equalityni.org/equalitydata

4 Conclusion and Next Steps

- 4.1 The Equality Commission has substantial concerns regarding the potential equality impacts of Departmental Budget proposals for Northern Ireland.
- 4.2 We are additionally concerned that when taken in combination, the proposals of individual Departments have the potential for further combined and cumulative effects, not only across the services provided by each originating Department, but also across Northern Ireland public service provision more generally. Proposals from

more than one Department may combine to potentially lead to additional or further exacerbated inequalities for protected equality groups.

- 4.3 The Commission considers that it there is a need for government to consider the equality impacts of budget proposals in their full context – taking account of potential cumulative impacts arising from the interaction of proposed cuts from across a range of Departments, and to identify and take mitigating actions so that the proposals, individually *or in combination* do not lead to new or exacerbated inequalities for protected equality groups.
- 4.4 The Commission reiterates the importance of strategic, long-term, funded approaches to effectively tackle persistent and exacerbated inequalities. There also remains a need for all Departments to ensure a focus on identifying and tackling inequalities which arose, or were exacerbated by, the COVID-19 pandemic or the public policy response to it.
- 4.5 We will continue to raise our concerns with Senior Officials, including our view that the consideration of equality impacts should be considered in their full context (taking account of potential cumulative impacts arising from the interaction of proposed cuts from across a range of Departments), so as to better consider if there are alternative budget proposals which could be implemented at this time to lessen the adverse impacts on the most disadvantaged people across the Section 75 groups.
- 4.6 We will continue to advise each Department with regard their statutory duties on the allocation of their budgets, including as they progress to decision making (in some Departments), publication of reports and monitoring the actual impacts.
- 4.7 We will also continue to engage with representative groups, to both ensure their awareness of Section 75 provisions, and to identify latest information on any new or exacerbated inequalities, including any proposals for how best these might be mitigated.