

Department for Communities
Causeway Exchange
1-7 Bedford Street
Belfast
BT2 7EG

By email only: budget21-22@communities-ni.gov.uk

25 February 2021

Dear Sir / Madam,

Re: Budget 2021-22 and Equality Impact Assessment

We welcome the opportunity to respond to the Department's consultation on its budget for 2021/22 and Equality Impact Assessment. I trust that you will find our feedback of assistance.

We note the Department's assessment that *'The proposed 2021/22 allocations will impact on the Department's ability to deliver public services, support Covid-19 recovery, undertake Housing Transformation and deliver New Decade New Approach priorities'*. We are concerned at the Department's comment that the budget will 'impact on core service delivery and potentially a number of Section 75 categories.' We note the intention that a number of programmes will be stopped or curtailed.

The Commission is represented on the co-design groups of each of the DfC social strategies, and we are similarly concerned as to how any agreed outputs will be delivered if adequate funding is not in place to ensure key outcomes and actions are developed and mainstreamed into the implementation of the PfG and underpinning Departmental delivery plans.

The Commission has previously stated, in the context of 2010 funding cuts, that we recognise that decision-makers who have to work with greatly reduced budgets have tough choices to make and people are sure to be disadvantaged as a result. We noted that it is even more important in that context, that all possible steps are taken to protect the most vulnerable in our society and to ensure that the impact on them is a key consideration where cuts in services are being considered.

Section 75

The Section 75 duties include the Department for Communities' function of setting a budget and considering the budget impacts on its policies and service delivery. We

therefore welcome that the Department is consulting on an EQIA on its Draft Budget 2021-22 and that an easy read version of the EQIA was produced.

It is important that the Department demonstrates clearly that it is paying due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations. The duties should enable financial decisions which are informed by evidence of the impact they are likely to have, where mitigation and alternative policies have been considered, and which are transparent and accountable.

We also welcome that the Department has considered the potential equality impacts of the budget in the context of the current health pandemic and the pressures arising from this. The EQIA determines adverse impacts across a range of the Section 75 equality groups, including younger people, disabled people, men and women, people with dependents and carers claiming Universal Credit. It is determined that people with disabilities, those with dependents and carers are likely to be the most affected by reduced funding for advice sector services. The EQIA commits to consider mitigations in light of responses received during the consultation and when the Department is developing options to live within the proposed budget allocation.

Given the potential adverse impacts identified in the EQIA, and that the duties are continuing duties, it is important that the Department fully considers potential alternative arrangements, mitigations and its monitoring arrangements on its budget for 2021-2022. In this regard, consideration should be given to the actual impacts identified, e.g. delays in processing benefits, reduced advice services, reduced employability support and that monitoring arrangements are integrated to ensure that there is an evidence base to inform future decisions.

We recognise that the constraints of the overall budgeting process has meant that the consultation lasted 4 weeks rather than the 12 week consultation period referred to in the Department's equality scheme and trust every effort has been made to encourage responses to inform your decision making.

Public Policy Recommendations

In considering the prioritisation of budget allocation, it will be important to ensure a focus on tackling both the immediate and longer term impacts of COVID-19, particularly where they give rise to new or exacerbated inequalities. In that context I would urge you to consider a number of our wider recommendations which if addressed could effectively tackle long-standing inequalities and prevent the exacerbation of existing inequalities.

With regards to **gender (including transgender)** – the Commission has called¹ 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 and strengthening institutional mechanisms.

¹ For further details see: <https://www.equalityni.org/genderpolicy>

On **disability**, we continue to call for action² to: give full effect to the UNCRPD; deliver law reform; raise awareness and tackle prejudice; promote participation in public life: remove access barriers; address key inequalities; advance independent living; support decision making; ensure the provision of appropriate support for people who have reduced capacity for decision-making; co-ordinate cross-departmental actions; and improve data collection and analysis to enhance public services.

We have also identified a range of priority areas³ for **sexual orientation** equality. These include tackling prejudicial attitudes and behaviours; promoting positive attitudes; raising awareness of rights of LGB people and reform of sexual orientation equality law.

With regard to **age (older people)** we reiterate the need to see progress and reporting on the active ageing strategy, and continue to call for action⁴ to advance law reform (including on Age-GFS): reduce long-term unemployment amongst older people; ensure accessible accommodation, energy efficiency, and access to a comprehensive fuel-brokering scheme; ensure active participation in public life; Challenge age-based negative and prejudicial attitudes; and further mitigate equality impacts of welfare reform.

On **social protection**, the Commission recommends actions to: protect the most vulnerable from the adverse impact of welfare reform, particularly mindful of the impact on people with disabilities and women, and the barriers experienced by minority ethnic communities (including asylum seekers and refugees); and to identify and commit to specific measures which will mitigate the adverse impact of welfare reform, or any alternate policies which might better achieve the promotion of equality of opportunity⁵.

With regard to key inequalities in **employment**, the Commission has called for action to support women's economic participation, including through access to appropriate, accessible and affordable childcare; address any exploitation of migrant workers and the concentration of some minority ethnic workers in low paid employment; support people with disabilities to access and remain in the workplace; ensure the provision of training and programmes that are accessible and inclusive for all, to enable people to get into or stay in work⁶.

On **Housing and Communities**, priorities⁷ for action relevant to the work of the Department include: advancing sharing in housing while ensuring objectively assessed need is met; addressing the longer social housing waiting list for Catholic households; and improving the provision of disability related accommodation.

² For further details see: <https://www.equalityni.org/uncrpd> and <https://www.equalityni.org/Disability>

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

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

⁵ For further details see: <https://www.equalityni.org/WelfareReformPolicy>

⁶ For further details see: <https://www.equalityni.org/Employment>

⁷ For further details see: <https://www.equalityni.org/HousingPolicy>

In our view, the above points to a range of key issues which if addressed could effectively tackle long-standing inequalities and prevent the exacerbation of existing / development of new inequalities as a result of the COVID-19 pandemic.

Equality 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.

More recently, the COVID-19 pandemic has highlighted the need for access to up to date and detailed equality data in Northern Ireland, as a vital component in shaping public policy responses.

The absence of key equality data means that it is difficult for the Executive, Departments and others to assess the nature and extent of key inequalities, as well as to track progress in achieving agreed equality and good relations outcomes.

In order to assess the equality impacts and monitor any adverse impacts of policies, public authorities need information to ensure that decisions and equality assessments are evidence based and appropriate.

In this context, we recommend that the Department's work programme, and associated budget, includes provision to ensure the targeting, monitoring and reporting of actions – incorporating disaggregated equality data - to better advance equality of opportunity and address key inequalities

Further information is set out in our short ['briefing on the need for equality data'](#)

The Commission remains available to continue to provide advice and guidance on the Section 75 duties.

Regards

Darren McKinstry
Director of Public Policy & Strategic Engagement
Equality Commission for Northern Ireland