



Department for

Communities

An Roinn

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Department for

Commonities

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BUDGET 2023-24

Final EQIA Report - Annexes

3 October 2023

Annexes

ANNEX A

A.1 Details of the organisations responding include:

- Action Mental Health
- Advice NI
- Age NI
- Apex
- Ardoyne Youth Enterprises
- Amma Centre
- Ards & North Down Borough Council
- Armagh City, Banbridge and Craigavon Borough Council
- Arts Council Northern Ireland
- Ashes to Gold
- Barnardo's Family Connections
- Belfast City Council
- Cancer Lifeline
- Carrick Hill Community Centre
- Causeway Coast and Glens Borough Council
- Charity Commission NI
- Chartered Institute of Housing
- Cinemagic
- Cliftonville Community Centre
- Cliftonville Community Regeneration Forum
- Colin Neighbourhood Partnership
- Comhaltas Ceoltóirí Éireann
- Commissioner for Older People NI
- Confederation of Community Groups
- Co-operation Ireland
- Creative Learning Centres Deaf Women's Group NI
- Crumlin/Ardoyne Neighbourhood Renewal Partnership
- Derry and Strabane District Council
- Derry and Strabane Labour Market Partnership

- Disability Action
- Disability Sport NI
- Early Years
- East Belfast Community Development Agency
- East Side Partnership Response
- Equality Commission NI
- Equity NI
- Extern NI
- Falls Community Council
- Fermanagh and Omagh District Council
- Foras na Gaeilge
- Frank Gillen Centre
- Glen Parent and Youth Group
- Glenview Community Centre
- Grace Family Centre
- Greater Falls Neighbourhood Partnership
- Harmoni
- Harryville Mens Shed
- Homeless Connect
- Housing Rights
- Inner East Neighbourhood Partnership
- Joseph Rowntree Foundation
- Kids Together Belfast
- Kilcooley Women's Centre
- Law Centre NI
- Lenadoon Community Forum
- Lenadoon Neighbourhood Partnership
- Lenadoon Women's Group
- Libraries NI
- Ligoniel Village Neighbourhood Renewal Partnership
- Lisburn & Castlereagh City Council
- Lower Oldpark Community Association

- MACS Supporting Children and Young People
- Marrowbone Community Association
- Mencap NI
- Mid and East Antrim Manufacturing Task force
- Mid and East Antrim Labour Market Partnership
- Mid Ulster District Council & Mid Ulster Labour Market Partnership
- Musicians Union National
- Museums NI
- National Lottery Heritage Fund
- Newry, Mourne and Down District Council
- NI Commissioner for Children & Young People
- NICVA
- NI Federation of Housing Associations
- NILGA
- NI Housing Executive
- NI Screen
- NI Sports Forum
- NI Union of Supported Employment
- NI Women's Budget Group
- Neighbourhood Partnership Pathway Fund
- No Alibis Bookstore Outer West North Belfast Senior Citizens Forum
- North West Migrant Forum
- Participation and the Practice of Rights
- Praxis Care
- Presbyterian Church in Ireland
- Royal National Institute Deaf People
- Rural Community Network
- Short Strand Community Forum
- Sinn Féin
- Society of Authors
- Society of St. Vincent de Paul

- St Joseph's Centre for the Deaf
- The Linen Hall
- The Rainbow Project
- The Tenants Associations of Sheltered Dwellings
- The Ulster Society for Promoting the Education of the Deaf and the Blind
- Triax Neighbourhood Partnership
- Tullycarnet Partnership
- Ulster Rugby
- UNISON
- Unite the Union
- Upper Andersonstown Community Forum
- Volunteer Now
- Waterside Neighbourhood Partnership
- Waterside Women's Centre
- West Belfast Partnership Board
- Wishing Well Family Centre
- Women's Policy Group NI
- Women's Regional Consortium
- Women's Centre Derry
- Women's Platform

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	Theme	Summary Comment / Points Raised	Response
1	Advice Sector	<p>1.1 The Department should provide explicit recognition for the role and impact of the independent advice network and a continued commitment to protect funding for these vital services targeting those most in need.</p> <p>1.2 The budget reductions will impact on funding for services such as those delivered by Advice Sector and Housing Rights which will weaken our collective capacity to respond to this need. In so doing, this will have the effect of moving further away from the policy direction of the NI Executive to promote wellbeing and will undercut the Strategic Priorities of the Department for Communities. More devastatingly, the reductions also risk a more deeply entrenched socio-economic landscape with heightened levels of homelessness and poverty, which are more expensive to address in the long term than the prevention activities which could have ameliorated them.</p> <p>1.3 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Advice services and those working with vulnerable families all say that as we recover from covid, people on benefit support are struggling even more. Any reduction in support to that section of the community will have a detrimental effect on already struggling families.</p> <p>1.4 Sustaining resources in third sector organisations is critical to migrate against the impact of proposals on section 75 groups who rely on their service.</p> <p>1.5 Advice organisations play a key role in helping older people access public services, benefits and other entitlements, to stay active and connected, and to participate in the life of their community.</p>	<p>The Department recognises the importance of continued advice sector funding.</p> <p>The Department recognises the impact reduced funding could have on all Section 75 groups.</p> <p>The Department recognises the complexity of the benefit system and is fully supportive of continuing advice sector funding in 2023/24, especially given the need to support those impacted by the Move to Universal Credit.</p> <p>The Department's 2023-24 budget has been targeted to ensure continued support for the advice sector this financial year, with no cuts proposed.</p>

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2	Culture, Arts, Heritage & Sport (including libraries & museums)	<p>2.1 The Department should prioritise funding to help cultural organisations survive, as when such cultural organisations are lost they are extremely difficult to rebuild. Northern Ireland is already lacking on a cultural stage in comparison to our neighbours and allowing our current heritage to decline will damage attractiveness of this country to future and current residents as well as visitors. As seen with the Ormeau Baths Arts Centre it is important not to lose these organisations as they may never be rebuilt, resulting in a loss to the wider community.</p> <p>2.2 The arts contribute to better health, improved mental health and wellbeing, economic opportunities and a shared sense of community. Arts organisations employ, support and develop writers, actors, musicians and other workers in the creative sector. A publicly supported arts sector is essential for community wellbeing. Cuts to the arts would negatively impact upon all of the groups identified in the consultation document as well as essential community relations work and the promotion of disability equality. Arts funding is already significantly lower in Northern Ireland than in other parts of the UK and the Republic of Ireland. Northern Ireland invests only £5.44 per head of the population, compared to £7 in England, £10.35 in Wales and £25.90 in the Republic of Ireland. Government investment in the arts in Northern Ireland has fallen over the past decade from £14.1m in 2011 to £9.7m in 2023.</p> <p>2.3 The creative sector in Northern Ireland plays a vital role in inspiring, educating and entertaining people, in building peace, reconciliation and inclusion, in promoting health and wellbeing, and in providing economic opportunities. We need more investment in the arts in Northern Ireland not less.”</p>	<p>With DfC facing a Resource funding gap of £111.2m (15.5%) in 2023-24, the Department acknowledges that managing a Resource pressure of this magnitude will undoubtedly impact on the Department’s ability to meet demand for public services in 2023-24. This includes services provided by all its ALBs and the Sectors they support.</p> <p>The Department has sought to minimise the impact on those ALBs by not passing on the full extent of the cut it faces in 2023-24. The Department continues to work with those ALBs to seek to minimise any impact on the ALBs service delivery.</p>

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		<p>2.4 A standstill budget to the Arts Council NI allocation is a real terms cut. We need more investment, not less to enable the sector to provide these valuable contributions and more to Northern Ireland’s communities: for social inclusion, enrichment of life quality and local regeneration for physical and mental health for enhancing education and learning ability for the economy for tourism for engaging young people and creating confidence and motivation for skills creation and transferability and increasing employment chances for Northern Ireland’s reputation. A petition, launched by Equity gained widespread exposure across Northern Ireland, with dozens of theatres and performing arts organisations and the Musicians Union, BECTU and the Society of Authors expressing support. The petition reached 12,500 signatures to send this strong message to the Department. Our communities want more investment in the arts.</p> <p>2.5 Cinemagic has established a worldwide reputation for excellence in youth film programming and in its creative and innovative approach to tackling social exclusion through the medium of film. Cinemagic engages with 40,000 young people each year. It educates the next generation of filmmakers, from camera operators and sound engineers to actors, writers and directors, with a particular focus on inclusion and those who might face barriers entering the industry. Funding cuts put all these initiatives in jeopardy. Cinemagic provided numerous testimonies from a wide range of people on the benefits of the organisation and its festival.</p> <p>2.6 The positive return which sport generates on social & health benefits supports all communities and S75 groups. Cuts would impact on sport & clubs seeking to upgrade facilities to widen S75 participation. Ultimately, with a reduction in sports programmes and investment in capital projects, less people will be able to access sport, and the positive interventions that it makes to health and mental health. This will lead to worse outcomes for those individuals, and</p>	

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		<p>invariably, Section 75 and other marginalised groups will be most impacted as a result.</p> <p>2.7 Reductions to arts funding will reduce the ability of EastSide Arts to develop participatory arts programmes which engage with many of the Sections 75 groups. This will have a detrimental effect on those with dependants, young and older people all of whom benefit in terms of improved wellbeing through arts engagement.</p> <p>2.8 Reductions to arts funding will reduce the ability of groups to develop participatory arts programmes which engage with many of the Sections 75 groups. This will have a detrimental effect on those with dependants, young and older people all of whom benefit in terms of improved wellbeing through arts engagement.</p> <p>2.9 EastSide Tourism is developing new programming which aims to promote engagement and ownership of local heritage development. In particular, its outreach activities reach older people and those with mental health issues and physical disabilities. Therefore, a reduction in funding impacting frontline staffing would have a negative impact on these Section 75 groups.</p> <p>2.10 UNISON represents members working across libraries. We have consistently opposed cuts to library services on the basis that libraries are a vital community resource that provide real social and economic benefits, particularly in the most disadvantaged communities. It is essential that our library service is properly resourced to serve communities who are reliant on it. Our members advise us that a reduction in funding is already impacting on staffing across libraries. Notwithstanding our opposition to these budget cuts coming from the Department, as a union representing staff UNISON expects that there will be full engagement with us by Libraries NI on its budget</p>	

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		<p>allocation for 2023 – 24. We will require detailed information on any proposed reduction in opening hours, potential library closures or other reduction in services, and any impacts on staff.</p> <p>2.11 We have already seen the closure of the only library serving people living on the lower part of the Crumlin Road. We agree that further closures or reductions on service would impact a number of groups, particularly older people and families.</p> <p>2.12 The proposal to reduce baseline funding position by 5% across the Department’s 11 Arm’s Length Bodies is deeply problematic, and likely to have adverse impact across many of the Section 75 groups, including older people. In particular, cuts to the budget of NIHE, Arts Council, NI, Libraries NI, National Museums N, Sports NI, COPNI we believe will have significant adverse impact on older people across a range of indices - e.g. health, mental health, loneliness and isolation, active ageing, protection of older people’s rights, supporting independent living, provision of quality homes - as well as staffing levels within the organisations. We note that no specific mitigation has been offered by the Department. Age NI believes that the EQIA does not set out a coherent analysis of the adverse impact, supported by specific available data (including identification of data gaps); in order that clear mitigations can be identified by the Department. It is recommended that each separate policy proposal be subject to a screening exercise and EQIAs conducted if necessary.</p> <p>2.13 Community Planning Framework should be applied to ALBs to ensure greater synergies and collaborative working. For example, the potential for e.g., amalgamating Museums and Arts to form one overarching entity could be explored and Sports could be maximised against local Community Planning Partnerships. There is deep concern by the potential impact of cuts</p>	

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		<p>on local libraries, particularly in relation to rural service delivery and book stocks. If rationalisation is necessary, local libraries could be embedded in communities through councils' local centres and satellite centres, reducing the need for additional buildings, and staff could be co-located to maximise community planning outcomes.</p> <p>2.14 In terms of access to cultural and sporting activities, the isolation faced by individuals with sensory loss is well documented leading to poorer mental and physical health outcomes. It is therefore essential that in streamlining budgets, initiatives designed to support these groups is maintained, including the additional capacity and cost required to deliver information about initiatives and the services themselves to ensure that they are accessible in terms not just of buildings but in terms of language and communication support and information.</p> <p>2.15 Arts Council Northern Ireland supports: festivals open to all S75 groups; A result of funding cuts will lead to a loss of employment and potentially community arts centres/programmes and festivals catering for all. If funding is reduced the people who will feel this the most are those who cannot afford higher ticket prices – a likely income of reduced funding. Fewer productions or closures of buildings provides less access to the arts to local citizens who may not be able to travel further distances for the same access. Our LGBTQI+ communities and disabled members of the community deserve the positive messages that arts can provide, as well as the access to employment and opportunities. Our talented aspiring artists are already leaving or considering leaving Northern Ireland due to lack of educational and work opportunities and the appalling lack of parity of arts funding in comparison with the rest of the UK and Eire. Those seeking careers in the arts from all S75 backgrounds are</p>	

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		<p>likely to consider better funded, more hospitable, more diverse opportunities with better access elsewhere.</p> <p>2.16 The arts are playing an increasing role in creating sustainable employment, particularly in the media field, any reduction on service will have a detrimental impact on the community as a whole, but again, on the most deprived areas (as defined by NISRA). This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p> <p>2.17 Women, people with disabilities, people with dependants, black lives in music are all underrepresented and will be further disadvantaged if funding is cut. Money invested in the arts has a high return on investment, so to cut funding still further is not an economically prudent thing to do, even without considering the impact on the arts themselves. The music industry contributes millions of pounds to the economy of Northern Ireland and underinvestment in funding for ACNI and capital spend on venues and facilities will stifle growth in a sector that the Chancellor of the Exchequer has said is a priority. Any jobs lost, and any venues forced to close, will take years to reverse. “</p> <p>2.18 Any reduction on service will have a detrimental impact on areas of deprivation. 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). This approach runs contrary to the aims and objectives of the Department’s People and Place Strategy.</p> <p>2.19 Social inclusion, engagement in arts, sport and culture, extremely detrimental to young people for cuts in this area.</p>	

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		<p>2.20 The impact of the budget allocation for 2023/24 for National Museums NI is such that Northern Ireland would no longer have a national museums service. This will require public consultation, legislative change and a major redundancy programme. Given the historical funding position, the proposed budget allocation for National Museums NI for 2023/24 will jeopardise the very existence of the organisation; Any substantial change in service will take time and savings will not be realised in the short term; The loss of the national museum service will have a significant negative effect on the cultural health and reputation of Northern Ireland; Northern Ireland’s global reputation as a place to visit, live and invest will be negatively affected. There will be substantial negative impact on Section 75 groups who currently benefit significantly from engagement with their national museum service.</p> <p>2.21 Under Minister Ni Chualain, access to museums and the arts was seen as a key commitment to communities who saw them as “unaccusable”. Again, Cuts to this valuable service will impact on those most vulnerable under section 75 criteria. This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p> <p>2.22 Any reduction on the availability of Library services will be detrimental to our most vulnerable families, particularly in areas of social deprivation. Multiple Cuts from all departments will influence those most vulnerable in society including the communities that reside in Areas of Multiple Deprivation (as defined by NISRA). This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p>	

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		<p>2.23 The reduced funding of the library service will have disproportionate impacts specific impacts for the following Section 75 categories:</p> <ul style="list-style-type: none"> • Racial Group • Age • Disability • Dependents <p>There is limited information in the EQIA on adverse impacts relating to Section 75 groups who specifically use libraries.</p> <p>2.24 Belfast CC concerned with reduction in funding for Arts, Libraries, Museums, Sport.</p> <p>2.25 Libraries provide access to books and IT and are places of safety and warmth for many children, young people, families and older people. They are an essential service for many low-income households, providing opportunities for reading and learning and through programmes such as the bedtime read, opportunities to build friendships and networks of support. Beyond this, during this cost of living crisis they have provided warmth and access to IT where this was not available in the home. Reduction in and loss of this service will place access to free opportunities to read and utilise IT out of the reach of many low-income households.</p> <p>2.26 Reductions in investment in sport would also impact on the ability of all people with a learning disability to live full and active lives and to be fully included in society.</p> <p>2.27 The proposals in relation to the arts and sports are disappointing and will potentially contravene several articles in the UN convention on the rights of</p>	

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		<p>the child. Access to the arts is already unequal, based on levels of disadvantage experienced at an individual and community level and between urban and rural. There appears to have been no examination or evaluation of crucial role arts and sports play in the delivery of good relations programmes. Further consideration should be given to how these proposals will impact on 'The Good Relations Duty' within the Northern Ireland Act.</p> <p>2.28 In 2023/24, eleven arts organisations were recommended for rejection who would have received £536,010, AFP funding. Six of the rejected organisations are classified as small scale, that is their total annual income generation was less than £400k; three are classified as medium-scale (generating between £400k and £800k) and two large-scale (generating more than £800k in income). Small scale organisations fulfil a unique function within the NI arts and culture sector, working flexibly with artists, local communities (as participants and audiences) in different community settings to build platforms for civic interests and participation. By doing so they help strengthen inclusion and diversity within wider NI society. This disproportionate impact on small scale arts organisations will compromise their ability to do this forthwith, particularly within the context of Section 75.</p> <p>2.29 The 5% cut on the Arts Council's grant-in-aid allocation will have a direct impact on front-line arts organisations and their ability to deliver activity that addresses the needs of Section 75 groups.</p> <p>2.30 The need to protect front line services through our primary funding programme (Annual Funding Programme), will have implications for funding levels in other programme areas closely linked to departmental and government priorities. Reduced government funding will impact the Arts Council's ability to deliver targeted programmes aimed at reaching and engaging Section 75 groups. Diminishing investment in the arts means fewer</p>	

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	<p>Section 75 benefits can be attributed to government investment. The continued lack of investment in Northern Ireland's arts infrastructure has compromised the ability of venues to meet access requirements, in particular for d/deaf, disabled and neurodivergent audiences.</p> <p>2.31 Thought should be given to creating community libraries where members of the community could access reading material. If there is closure of libraries, books could be given to community groups and members of the community could access books at community groups premises. Potentially the most drastic impact will be in rural areas. The creation of community libraries could also potentially help to reduce social isolation and reduce depression.</p> <p>2.32 This is a cross cutting strategy contributing to the long-term health and well-being of the population. During the pandemic and the closure of sporting activities there was a huge increase in people walking. If cuts are going to take place there should be an emphasis through media and agencies to encourage people to walk more. The benefits to physical and mental health are well documented and this should be encouraged.</p> <p>2.33 Potential Impact of Proposals on Section 75 groups is hugely underestimated. With a reduction in sports programmes and investment in capital projects, less people will be able to access sport, and the positive interventions that it makes to health and mental health. This will lead to worse outcomes for those individuals, and invariably, Section 75 and other marginalised groups will be most impacted as a result. It will also have a negative knock-on impact for other aspects of what DfC are tasked to fund.</p> <p>In addition, Sports funding promotes good relations between people with different religious beliefs, different political opinions or from different racial</p>	<p>Funding for Covid Recovery Schemes ceased in the 2021-22 financial year when no specific funding was provided to the Department.</p> <p>With DfC facing a Resource funding gap of £111.2m (15.5%) in 2023-24, the Department acknowledges that managing a Resource pressure of this magnitude will impact on the Department's ability to meet demand for public services in 2023-24.</p> <p>The Department recognises and appreciates the contribution of our arts, creative industries,</p>

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		<p>groups and “promotes positive attitudes towards disabled people and encourage participation by disabled people in public life.</p> <p>2.34 Libraries NI – Libraries can have significant impact on health and social wellbeing not only through the services they provide but as warm spaces which is particularly important in a cost-of-living crisis that impacts particularly on those living in deprived areas, those who are socially isolated and those who struggle to afford their winter fuel payments. Any reduction in Libraries NI opening hours will have additional impacts on Section 75 groups in rural areas who use rural Libraries as meeting points and to access the internet using Public Access Terminals.</p> <p>2.35 Impact of arts cuts on S75 groups provided, including:</p> <p>Arts Council NI – A five-year strategic framework for developing the arts 2019-2024 – 51% of Arts Council funding goes to the most deprived areas of Northern Ireland, helping to deliver social change, economic prosperity and build a strong and a shared community.</p> <p>UNESCO Cultural organizations and the promotion of the diversity of cultural expressions, June 2023 (https://www.unesco.org/creativity/sites/default/files/medias/fichiers/2023/06/3-Policy_Perspectives_Spectacles_EN-web2.pdf)</p> <p>ACNI Freelance Practitioner Research Report 2021 – demographic of the freelance working community = majority female & 41% “working class”. Lack of diversity and accessibility in some sectors.</p> <p>Adverse Impacts – Creative Industries Economic Estimates 2021 document highlights that the Gross Value Added (GVA) for the creative industries was</p>	<p>museums and libraries to our communities, along with the economic, health and education benefits thriving sectors bring. While funding will be reduced in these areas, the Department continues to support these sectors within the resources available in the 2023-24 Budget.</p>

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	<p>£1,311 million in 2019, representing 3.1% of Northern Ireland’s total GVA. Each penny invested in the Arts brings money back into our communities. Creative industries provide employment to and benefits people from every section of society, regardless of age, race, political persuasion, gender, LGBTQI+ status, family environment etc.</p> <p>Reduction in funding will affect health and well-being, community and S75 group inclusion, employment, accessibility (through price rises and venue/programme closures).</p> <p>2.36 DfC data is not explicit about which Section 75 categories are impacted. Audit of Inequalities subsection on Sport doesn’t have a direct listing of children and young people. Less young people are able to participate in sport due to the cost of living crisis. Likewise those from Areas of High Social Need and those with a disability. Specific reference and evidence should be given on the impact of cuts to these groups.</p> <p>Sport NI – Reduction of funding for community sports programmes will have adverse impacts on all S75 groups, further compounding post-covid impacts on wellbeing. It is also worth noting the wider community benefits of community sports programmes for community resilience, mental wellbeing, strengthening employability, alternative youth diversionary activity, social connections and groups’ ability to leverage in additional funding to their community. The publication of the Ending Violence Against women and Girls Strategy will be impacted by any reduction in funding.</p> <p>The Sport and recreation sector has improved impacts on social return, community cohesion and economic impacts for NI, evidenced through reports such as the Economic Return on Outdoor recreation. Reducing</p>	

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		<p>investment will have adverse impacts in the immediate short term and longer term.</p> <p>2.37 People with different Sexual Orientations. Many LGBTQI+ people engage with specific arts and culture organisations, which provide safe and creative spaces for members of this community. A reduction in funding to these organisations risks potential closures or changes to working practicalities. DfC supported work tends to provide more targeted engagement with members of the community with protected characteristics than other music and cultural programmes.</p> <p>Affordability Risk – Raising prices may be the only viable response for these organisations to fill the budget gap created by the proposed cuts, which would adversely impact on poorer members of our community.</p> <p>DfC provides funding, through NI Screen, to Film Culture organisations that engage diverse communities and promote social cohesion, provide training and employability support.</p> <p>2.38 Critical funding should be allocated to support Covid Recovery schemes for Culture, Arts and Heritage, Sport and Voluntary and Community sectors; these sectors are all working on already very lean budgets, and the projected cuts to funding will result in the demise of a large number of these organisations and the removing of many services that are currently serving communities in vitally important ways that are aligned to the Department’s priorities, especially in provision of arts in the charity & voluntary sector which prioritises Section 75 groups such as children and young people, those with special educational needs and those from marginalised backgrounds.</p>	

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	<p>2.39 Do not withdraw or cut funding to Linen Hall Library as it provides a mechanism for talks, book launches, poetry readings and exhibitions. The Library is woven into the fabric of Northern Ireland’s cultural heritage and that cannot be lost.</p> <p>2.40 The Linen Hall Library is unique and internationally acclaimed. It’s archive material on the political conflict in Northern Ireland is of historical importance.</p> <p>The Library, in its central location in Belfast, is regarded with affection and respect by members of both communities in the city. With its links to the history of Belfast, the Linen Hall Library is now a tourist attraction in itself, as well as a reminder of the best aspects of Belfast’s history.</p> <p>2.41 Linen Hall Library is, in effect, a museum with significant records of historical, social and cultural importance and does indeed, through access to its collections and its events programme, do a lot to promote good relations. Further it enables a wide variety of people to access different political opinions through its various activities.</p> <p>2.42 I am deeply concerned at the potential scale of cuts to funding to the Linen Hall Library. This is one of Northern Ireland’s longest serving and most venerable institutions, providing a unique public service in Northern Ireland which isn’t replicated in any other museum or library locally. I believe the potential cuts that may be passed on to it could be devastating and undermine even its viability. I urge you to do all that you can to protect funding for the body.</p> <p>2.43 The Linen Hall Library is widely recognised as a neutral space. It is a meeting place and venue for community groups including ethnic minorities</p>	<p>The Department recognises the benefits of the Community Festival Fund, at this stage no reductions are proposed to the 2023-24 allocation.</p>

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		<p>and prisoner groups. It has a wide-ranging cultural programme with events that celebrate our cultural heritage and promote good relations.</p> <p>Any disproportionate reduction in the Library’s funding would, in my view, be a failure to have due regard to the desirability of promoting good relations.</p> <p>The Linen Hall’s Northern Ireland Political Collection contains around 350,000 items from the ‘Troubles’ and is the only archive in existence collected during a conflict and not retrospectively. It is the largest NI political collection in the world. The Library has an extensive Irish Language Collection and holds the Gibson Collection, which is the largest Robert Burns collection in the UK outside Edinburgh.</p> <p>The Library holds many literary archives, ranging from those of Louis MacNeice to Rosemary Jenkinson and Brian McGilloway and amongst its collections is a first edition of James Joyce’s Ulysses.</p> <p>The Library has extensive resources to support genealogy and the study of family histories, attracting researchers locally and from around the world.</p> <p>The Linen Hall Library has a wide-ranging cultural programme including book clubs and literary events. These celebrate our shared cultural heritage and promote good relations.</p> <p>The Library’s Theatre and Performing Arts archive is the primary source for theatrical material from Northern Ireland. It houses archives of playwrights as well as ground-breaking local theatre companies such as Charabanc and Tinderbox.</p>	

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		<p>Honorary Members of the Library include international figures from the literary, musical and theatrical worlds.</p> <p>The Linen Hall Library’s present location is a listed Victorian linen warehouse, which it has occupied since 1892. The Library is the embodiment of the value of our built heritage.</p> <p>The indicated cut in the library’s budget would have an adverse impact on the Linen Hall’s ability to give people access to different political opinions, not least in its archives, the supreme example being the Northern Ireland Political Collection.</p> <p>2.44 Mitigations should be made against current proposals for steep reductions in funding to the Linen Hall Library as it provides a safe haven for S75 Groups including currently discriminated-against and subject to violence LGBTQ+ and trans individuals; and the elderly.</p> <p>2.45 The Library is proud of its neutral reputation, its openness to all and its embracement of diversity. It realises the importance of outreach to communities and making the Library’s shared space and unique and important collections open and accessible to everyone.</p> <p>Access to the NI Political Collection in the Linen Hall and the ability for people to access different political opinion through the archive demonstrates that there would be a detrimental effect on people with different political opinions if the Linen Hall suffered major cuts. The projects over the last number of years proved that The Linen Hall is the acceptable place for difficult conversations and discussions about our shared history and shared future.</p>	

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		<p>2.46 The Department should have due regard to the desirability of promoting good relations between people with different religious beliefs, different political opinions or from different racial groups. Linen Hall Library plays a key part in prompting good relations due to the mixed nature of the content available. The Linen Hall Library has accessible collections of both Ulster Scots & Irish content which are available to everyone.</p> <p>2.47 Reduction in funding for Linen Hall Library will disproportionately affect Section 75 communities, this should be borne in mind in the equality assessment in such a way as to mitigate budget cuts at the library. The Linen Hall is a unique academic research centre, and a magnet for visitors which needs also to be borne in mind.</p> <p>2.48 Politics in Action' group – Concerned Linen Hall Library budget could be significantly reduced for 23-24. Two courses launched ('Politics in Action' & 'Living History') would not have been feasible without the excellent support of the Linen Hall Library. 'Living History' course was intergenerational and cut across class, social background, geography and educational achievements.</p> <p>2.49 I understand, as do all concerned citizens, that the public finances are currently under extreme pressure, and that all possible economies must be made. However, it is just as important that our culture, our history, and our heritage should be preserved both for ourselves and for future generations. Our culture is central to our very existence, and certainly to us as a continuing civilised society and polity. Therefore, I urge you to reconsider your decision to cut funding to the Linen Hall Library by £80,000, which is a sum that is paltry in the overall scheme of things at present, but which will make an enormous and very destructive impact upon an irreplaceable part of who we are as a community.</p>	

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	<p>2.50 Investing in culture means investing in strong community relations, better health and social care outcomes, and a more robust economy. Therefore, a cut to the arts would negatively impact upon the sections of society referred to in the consultation document. I believe that it would be unhelpful to the objective of promoting good relations between people with different religious beliefs, different political opinions or from different racial groups, and the need to promote positive attitudes towards disabled people and encourage participation by disabled people in public life.</p> <p>2.51 Linen hall Library – Reduction in funding would impact on People with different political opinions. Small business has carried out substantial work for the Linen Hall Library over past three years to maintain its important Irish Language collection. Reduction in funding likely to result in this work not being continued, affecting the availability of Irish language literature and impacting on the viability of our business, which is based on the peace line in Belfast (in the North City Business Centre) and provides employment to both communities.</p> <p>2.52 DfC provides match funding to the BCC Community Festivals Fund, a long-standing scheme established to support 15 community festivals in Belfast. Any reduction or removal of match funding for this scheme would have an adverse impact on the delivery of the fund and the community organisations it supports.</p> <p>2.53 EQIA references Third Party Organisations at 7.v but doesn't provide any specific detail on actual organisations or numbers of disabled people and those economically inactive who secured and sustained paid employment. The EQIA document is incomplete in respect of potential impacts on disabled people.</p>	

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		<p>2.54 In line with 2.2 of the Equality Impact Assessment, there is little data to support the requirement for the Department to have “due regard to the desirability of promoting good relations between people with different religious beliefs, different political opinions or from different racial groups.</p> <p>2.55 Another issue that isn’t included is the absence of any criteria to determine impact on low-income households. This is a key issue, and with CCÉ providing low-cost music lessons and instrument hire, it is imperative that people from all backgrounds should be able to access music and the arts. As an organisation that has been delivering this for over 70 years, CCÉ want to be able to continue to do this in the years ahead.</p> <p>2.56 Additional to the issues identified in Section 7, CCÉ would add that the decrease in funding will lead to a loss of opportunities to host large scale events and make other regions a more attractive prospect for hosting. Whilst the initial investment may require funding from the department and/or its ALBs, the economic return generated far outweighs this.</p> <p>2.57 The development of neighbourhood tourism initiatives underpinned by a vibrant arts and cultural sector and supported with rich heritage assets has made a significant contribution to the overall programme of social and economic development helping to regenerate communities. From a West Belfast perspective, we welcomed over 2 million visitor trips to our community in 2019. This was a record year for tourism (Pre Covid). As tourism continues to rebuild and recover from the global pandemic, we continue to see the associated benefits in securing and sustaining jobs, instilling civic pride, creating a warm welcome and developing pathways for young people to employment. The opportunity has indeed been seized from peace to develop the West Belfast Tourism, culture arts and heritage product, develop the infrastructure; support related business and social enterprises, train local</p>	

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		<p>people as guides, promote local social and economic regeneration via small business development and job creation. The marketing and promotion of the uniqueness of West Belfast as a tourist attraction has helped to re-brand the area as a place to visit which provides a quality product and delivers customer satisfaction. Local festivals such as Féile an Phobail and social enterprises like Fáilte Feirste Thiar act as a role model, a leader and living example in what can be achieved when local communities work collaboratively and in partnership with Government Departments, the private sector, promoters and other stakeholders fostering an increase in employment, opportunities and the overall contribution to the portrayal of an image of a community - confident, welcoming and vibrant.</p> <p>2.58 Heritage is not just about saving old buildings. The definition of heritage is broad for a good reason because it means different things to different people. This diversity adds to the richness of assets and experiences that are cherished in our communities, and the value that funding their sustainability adds to local communities. The ripple effect of funding heritage projects has a wider impact than just saving a building or space at risk. The positive benefits spreads to mental health and wellbeing, regeneration and local economies, sustainable environmental action, pride of place, and saving what is important for future generations to learn, challenge and enjoy. Heritage helps us explore our identity and character, and it defines both our regional and individual place distinctiveness in our villages and towns, from the ecclesiastical capital city of Armagh to the unique walled city of Derry/Londonderry. It is a catalyst for economic, social, physical regeneration, addressing social deprivation, and providing a basis for cultural and creative activity. The heritage sector is diverse and needs to be in order to meet the unique range of heritage offers in Northern Ireland. Heritage is what makes us ‘us’, it is our authentic voice and has the power to connect communities and enrich lives. Heritage is as much about the future as the past. By making the most of it, by using it as the</p>	

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		<p>foundation of our development, we unlock its potential for the future. It is an opportunity that we cannot afford to waste. Heritage needs to be recognised and supported as an integral part of our society due to the value it adds to communities. It is not just an add-on but is the very fabric of our communities. It is therefore imperative that heritage continues to be protected and championed by the Department for Communities.</p> <p>2.59 “We believe that the department should determine need on the basis not of making cuts across the board, but to review strategically how existing funded projects align with future ambitions to develop a more shared society. There are several reports which identify the cost of division, as well as evidence to support the benefits of a more integrated society, and so through cutting funding to projects that support this outcome would be short-sighted and ultimately, result in additional costs in the long-term.</p> <p>Vulnerable and marginalised groups, some of which are included in Section 75, must be able to access culture and arts, and CCÉ’s unique position is also playing a key role in making Irish culture more accessible across the community by demonstrating the shared cultural heritage on and across these islands.</p> <p>2.60 DFC contribution to NI Screen, supporting film exhibition organisations such as Belfast Film Festival, Cinemagic etc and delivering work in areas such as after schools’ clubs that reach often vulnerable groups and individuals. Cinemagic last year delivered work that worked with young programmers to screen films that directly delivered support to foodbanks. Across all the section 75 areas, access to culture has not been identified as a possible implication of reductions in funding. This will impact on the following groups:</p>	

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		<ul style="list-style-type: none"> • People of different ages – cinema is one of the most efficient and low-cost ways of young people accessing culture. • People with a disability – many of NI Screen’s directly funded organisations offer services to disabled patrons which helps remove access to culture, for example subtitled screenings. • People with different sexual orientations – Cinemas are often a safe space and many of the above mentioned organisations work closely with LGBTQIA+ organisations to show work which gives a cultural space to that community. • People with or without dependents – many of the above mentioned organisations provide a low-cost family cultural experience. If ticket prices were raised, many of these groups would suffer. <p>These funded organisations also provide support and development to the wider NI community cinema sector who are delivering in rural areas far from Belfast or Derry. Any reduction in funding will see lesser support and therefore less rural audiences being served and allowed access to cultural cinema.</p> <p>2.61 A reduction of funding to NI Screen would have a detrimental blow on the ability to provide key support services and educational activities, impacting on children’s growth and development, confidence and overall well-being.</p> <p>NI Screen’s Core Education Programme targets support on schools in disadvantaged areas. Over 75% of all Creative Learning Centre activity was delivered in partnership schools with a large catchment of young people from disadvantaged areas. The Programme also supports community cohesion by</p>	

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	<p>providing a neutral and positive environment for cross-community collaboration.</p> <p>2.62 Data – People with a Disability: Disability Sport NI – Impact of Covid 19 survey – The impact of Covid-19 on people with a physical disability’s mental health and participation in sport and active recreation.</p> <p>Adverse Impacts – Research shows that Disabled people, Women and Girls and those from areas of deprivation have been disproportionately affected by Covid-19 and the cost-of-living crisis. Physical activity levels were already lower for these groups and their participation rates have been slower to return to pre pandemic levels than other groups. The cost-of-living crisis has also seen sports clubs affected with a significantly high proportion of clubs extremely concerned that the most affected groups will see an even bigger drop in participation levels.</p> <p>A reduction in capital investment would have a significant impact in the development of sports facilities, particularly when making these more accessible for people with a disability or more welcoming for children and young people or women and girls. Sports and community facilities often do not have the required accessible access to enable everyone to be able to take part in their facilities.</p> <p>Inability to fulfil the equality Strategy 2022-2025 that specifically highlights inequalities, including:</p> <ul style="list-style-type: none"> • 12% of LGBT community “avoid participating in sports groups because of fear of discrimination or harassment” 	

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		<ul style="list-style-type: none"> • Accessibility to (...) active recreation and venues and activities by people with a disability and older people” • Less participation in sport and physical activity by females, older people (over 45), racial group, marital status, marital status, people with a disability and people with dependents” • Under representation of women in community development and leadership roles. 	
3	Employment Support, such as Labour Market Partnerships	<p>3.1 The Department’s funding allocations need to support people with disabilities and special educational needs with barriers to employment from being excluded from our society.</p> <p>3.2 Labour Market Partnerships support the most vulnerable and marginalised in finding work and retaining employment. The removal of this funding will impact people in our local communities.</p> <p>3.3 The LMP approach has helped companies find new employees from the most disadvantaged backgrounds in NI, who otherwise would never have found employment by themselves and would therefore still be a financial burden to the government. Rather than stop the LMP program, other funding options should be considered. This will reduce the dependence on the benefit system.</p> <p>3.4 Pausing Labour Market Partnerships investment would have a strategic impact on the implementation of a number of programmes aimed at helping long term unemployed and economically inactive people return to the workforce. This will place NI behind the rest of the UK when it comes to labour market strategy and the provision of training to enable the NI workforce to address current and future skills. This will impact people with disabilities,</p>	<p>The Department continues to support those with barriers to employment through a range of diverse labour market provision. In considering allocation of the Department's constrained 2023-24 Budget careful consideration has been given to balancing priorities, need and available funding to maximise the supports the Department provides to those who need it most, including any adverse impacts on Section 75 Groups.</p> <p>The Department acknowledges the impact Labour Market Partnerships budget cuts will have on vulnerable people and Section 75 groups. Labour</p>

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		<p>women who have stepped out of the workforce and find it difficult to return without the right skills provision.</p> <p>3.5 The EQIA document fails to provide data relating to section 75 at local and council area level. The data provided in the document is of a general nature and covers Northern Ireland as a geographical area. It does not drill down into data which have been gathered at local level. The data, needs and Issues identified in the Document are not representative of the Ards and North Down area. The groups most affected in Ards and North Down will be (as per Section 75 groups):</p> <ul style="list-style-type: none"> • People of different ages (16-24) • Men and women generally (lack of funding to break barriers to unemployment and economic inactivity) • People with or without a disability (barriers facing people with disability when wanting to access work or training) • People with or without dependants (Parents and Single parents seeking employment or training) <p>The proposed removal of the LMP funding, will impact the most vulnerable groups in council areas, those at risk of being further pushed into poverty and economic inactivity as the support currently and previously available will not be there to address their needs. The ending of Step 2 Success converged with the Covid pandemic, furlough and subsequent economic and cost of living challenges currently hitting households and businesses across Northern Ireland. Ever since S2S finished European Social Fund had been available to support unemployed, economically inactive and disabled individuals within the Council area. However, these too closed on the 31st of March 2023. 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.) In addition, the introduction of the UKSPF which was due to go live in April 2023 was expected to fill some of the void left by</p>	<p>Market Partnership funding will be sustained at 2022-23 levels for 2023-24.</p> <p>The Department continues to support those with barriers to employment through a diverse range of labour market provision. This includes a range of services delivered through our network of 35 local Jobs and Benefits Offices, and employability programmes such as Workable NI, Access to Work NI, Condition Management Programme, Advisor Discretionary Fund, and Work Experience Programme.</p> <p>Additionally, across 2023-24 and 2024-25, the NIO is providing a funding allocation to Northern Ireland of £15m for JobStart, and the UK Government is providing Shared Prosperity Funding of £57m.</p> <p>In considering allocation of the Department's constrained 2023-24 Budget careful consideration has been given to balancing priorities, need and available</p>

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		<p>ESF; however, there are considerably less funds available, and it is suggested that there will be fewer but larger programmes delivered by regional bodies. The Ards & North Down Council area has not been able to draw any significant funds yet from UK SPF and it is unlikely that any funds secured through that programme will hit the ground before the end of the year, leaving a significant gap in the nature and level of funding available to address the adverse impact that the cessation of the LMP activities would have in the Council area. has been demonstrated also through the previous section that the work of the LMP addresses issues such as economic inactivity especially for individuals between 16 and 24 years of age, the gender gap, education achievement, a better skilled labour supply, and offers opportunities for people who are under-employed and for people with a disability to upskill and contribute to the local economy. Its work does not only allow people with disability to stay in work but to access work opportunities and to remain economically active in the long-term. People who have been furthest removed from the labour market, and this concerns the four main groups referred to in this response, need a lot of handholding and mentoring which will not be delivered if the LMP does not proceed with its plans. This mentoring is crucial to these individuals to even get the confidence to start engaging with any work or skills-based opportunities. The EQIA has mentioned young people, but not older people. Ards and North Down has the highest percentage in Northern Ireland of people aged over 65 at 22.1%. The EQIA therefore does not take into account the fact that these individuals, some of whom have consideration experience and knowledge, can contribute on a voluntary basis to some mentoring programmes aimed at helping younger people to reconnect with work and training. Additionally, there could be opportunities for these people to reskill and retrain and return to the work force, particularly in light of the cost of living crisis. The EQIA does not address the section Men and Women and has failed to comment on the adverse effect that the proposal to withdraw funding to the LMP would have on women and single parents or people with caring responsibilities. The programmes run by the LMP, such as</p>	<p>funding to maximise the supports the Department provides to those who need it most, including any adverse impacts on Section 75 Groups.</p> <p>The Department recognises and values the importance of the Labour Market Partnerships with Councils and the positive outcomes which can be delivered. Since the Department launched its Budget 2023-24 EQIA, considerable work has been ongoing to consider and sustain LMP funding in 2023-24.</p> <p>The 2023-24 Budget Settlement presents significant challenges for all NICS Departments to manage the forecasted level of pressures in 2023-24.</p> <p>The Department has sought to mitigate the impact of its constrained budget on vulnerable people and Section 75 groups. Across 2023-24 and 2024-25, the NIO is providing a funding allocation of £15m for JobStart</p>

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		<p>Academies, provide a “Barrier Removal” element which can be used by women and people with caring responsibilities to access training and employment, knowing that their dependants are being cared for professionally, freeing time for them to work or learn. The EQIA does not address Ethnic minority groups such as newcomers from outside of Northern Ireland. In the current geo-political situation, newcomers have arrived in Northern Ireland seeking to contribute to the local community and economy. The LMP, through its work, is a vehicle to engage with potential employers and organisation to facilitate integration in the local economy.</p> <p>3.6 Racial Groups – the latest census shows Mid Ulster as having the highest % of residents who identify as neither British nor Irish, removing the LMP’S will have significant impact on these groups whilst also impacting the labour market available to businesses in the area.</p> <p>Gender- The Mid Ulster area shows the widest gender employment gap, females are actively being encouraged back to the workplace through the LMP and this will have an adverse impact on the progression of this initiative.</p> <p>Age- Both younger and older people will be affected, no LMP funding will have an adverse effect on the ability to reach out to these groups.</p> <p>Disability – Mid Ulster has the highest disability employment gap and this was an area where it was felt that employers were unaware of the opportunities available to them – without this support it is unlikely that these individuals will achieve long term employment.</p> <p>3.7 LMPs are a critical intervention with an aim to improve the employability outcomes for people. They exist to help people secure and maintain</p>	<p>which is projected to support approximately 1500 young people.</p> <p>The LMPs will be sustained at 2022-23 levels and not reduced in 2023-24.</p> <p>The Department continues to meet its statutory obligations and will ensure all decisions relation to Budget reductions are in line with the Northern Ireland (Interim Arrangements) Act, which received Royal Assent on 24 May 2023.</p> <p>The Department recognises the hard work and commitment of LMP staff and partners in establishing and achieving success through local LMP structures. The Department continues to support those with barriers to employment through a range of diverse labour market provision. In considering allocation of the Department’s</p>

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		<p>employment the ripple effect of the budget cuts will result see employability outcomes come under pressure.</p> <p>3.8 DfC to reconsider reinstating funding the LMPs, removal of Labour Market Partnership programme funding should be reinstated as it has helped boost employment/self-employment/skills levels within the council area. Pausing LMP funding will undermine the opportunity to support people into employment.</p> <p>3.9 The Department of Communities should be mindful of its statutory obligations in relation to section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006), and in particular the disability duty to encourage participation by disabled people in public life.</p> <p>Those included in the Section 75 groups, will face additional barriers to employment and the removal of support which has been provided via the Labour Market Partnership will only serve to compound these barriers and see them further from the labour market in this cost-of-living crisis.</p> <p>The need to intervene with programmes to address the situation of female economic inactivity was being addressed by the LMP through the provision of employability academies designed to support women who wished to work but faced challenges of affordable childcare. This could be affected.</p> <p>3.10 The adverse impact of removing funding for LMP's on the local employment sector cannot be underestimated as they have the potential to do so much more and removing this funding will ensure that those from the Section 75 groupings most at risk, who need support will simply not get it and this will perpetuate economic immobility for local people who face barriers to</p>	<p>constrained 2023-24 Budget careful consideration has been given to balancing priorities, need and available funding to maximise the supports the Department provides to those who need it most, including any adverse impacts on Section 75 Groups. The Department acknowledges the impact Labour Market Partnerships budget cuts will have on vulnerable people and Section 75 groups, as a result of this LMP funding will be sustained at 2022-23 levels (not reduced) in 2023-24.</p> <p>The Department acknowledges any reduction in LMP funding would have adverse impacts across all Section 75 groups.</p> <p>The Department's funding bids for 2023-24 were not met in full. Work is ongoing to maximise use of the Department's 2023-24</p>

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		<p>employment. This in turn will have a wider impact on the local and wider economy at a time when employers are reporting a tight labour market and difficulties with recruiting and retaining skilled staff. The impact of a withdrawal of funding will be that economic inactivity will continue especially for Section 75 groups including women.</p> <p>The Department could continue with LMP delivery for 23/24 with reduced staff to deliver a reduced low-cost action plan until additional funding can be allocated to support a full action plan. This would enable the Labour Market Partnership members to continue to build on the partnership work which has been established and continue to work together to support those in need of employability support.</p> <p>3.11 An action plan had been prepared and expectations raised across Newry Mourne & Down District among LMP membership organisations and beyond for an Action Plan for 2023-24. This ‘pause’ will create confusion and ultimately damage the credibility of LMP for any potential reengagement of LMP activity.</p> <p>3.12 Mid Ulster has the highest percentage of residents whose national identity is neither British or Irish. Removing employment support will result in Mid Ulster’s LMP not being able to consider progressing projects as identified during the latest Strategic Economic Assessment process, which will support both participants and employees transition into work by assisting in barrier removal. Should Mid Ulster not be able to support these workers, this could result in a further restriction of potential workforce and skills pipeline, impacting on the area’s ability to recruit and retain staff and therefore its GDP contribution to Northern Ireland. Mid Ulster also has the highest Disability Employment Gap. Only 24% of disabled people are in employment against an NI average of 37.3%. If funding is stopped, even temporarily to LMPs, trust</p>	<p>Budget in the provision of public services and supports.</p> <p>Work is ongoing with regards to estates rationalisation, whilst ensuring continuity of front office / customer service focused delivery.</p> <p>Given the high disability employment gap in Northern Ireland, the Department has continued work to explore funding options to sustain LMPs in 2023-24 and mitigate impacts to people with disabilities.</p> <p>The Department recognises the adverse impact unemployment can have on young people, men and woman, disabled people and people with dependants and people in other Section 75 groups. With high levels of unemployment both young and</p>

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		<p>will be lost, both with DfC and the LMP/Council itself and a resumption at any point would be very difficult. Pausing funding on the LMP initiative is short-sighted and will leave the economically inactive with no direct support provision. A huge amount of work and effort has been invested in building a shared commitment across the partnership as well as successfully delivering relevant local projects which are having a direct impact on both unemployed and economically inactive residents. This has been supported by the DfC team and their vision of how local provision can deliver immediate impact; it is clear that this localised partnership approach has been working successfully and delivering results. Board members and wider partners have contributed their time and expertise voluntarily in order to determine the best interventions with the highest outputs for the local area and were really encouraged by what they could contribute at a local, and to a lesser degree at a regional level. There was also a determination to continue making a difference to the local economy under a new three-year strategy which is now at risk. Confidence in the system, reputations and the overall process will be damaged, possibly to the point that a similar model will not be successful in the future. Mid Ulster LMP would suggest that DfC should consider allocating a larger percentage of the budget to LMPs (e.g., 50%) which would enable LMPs to continue, albeit on a reduced basis. The impact of the reduction of funding should also be considered in the context of the additional benefits which may be an add on effect from moving unemployed and/or economically inactive back into the labour market. Less people may require social housing, benefit support, fuel poverty support etc. Moreover, the benefits to the individual in terms of confidence, feeling better about themselves, skill building, personal development etc., is immeasurable and has a direct correlation in reduced need for healthcare support, especially for mental health issues, education achievements, and overall contribution to their local communities. Mid Ulster LMP would strongly urge the Department to urgently review and reconsider the funding allocation to the LMP model. The proposed removal of funding for</p>	<p>disabled people can be further from the labour market.</p> <p>The Department has developed a range of labour market interventions to help people find work. These include a JobStart programme for 16-24 year olds, an expansion of the Advisory Discretion Fund, including the payment of upfront Childcare costs to support parents' return to employment, and a Work Experience Programme (WEP) to offer 2 – 8 week work experience placement opportunities to job ready unemployed people. ""</p> <p>The Department notes this comment and recognises the need for tailored programmes for those with barriers to employment.</p> <p>The Department's Workable Programme has not been proposed for reduction as part of the 2023/24 budget allocations.</p>

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		<p>LMPs completely undermines the department’s policy and will result in no direct interventions being available to the economically inactive to encourage them back into the workforce. Additionally, a localised model which assesses the economic environment within each council district to address the unique issues being felt at a local level will no longer be available. Given the “people crisis” Mid Ulster industry is facing, the need for support and localised employability initiatives are more important than ever to meet the immediate and medium-term skilled labour shortages. Supporting people into fair, sustainable jobs is central to delivering many of the ambitions for a modern, inclusive and competitive economy in Northern Ireland.</p> <p>3.13 The NI disability employment gap is greater when compared to the UK and needs to be urgently addressed through the provision of adequate employability support for Disabled people. Women are disproportionately more likely than men to have caring responsibilities. Targeted programmes and support are critical to enable these women to re-join the labour force. Over the past twelve months our LMP has worked with a substantial number of women who have had to give up work because of caring responsibilities (childcare and older family members). Our interventions have had an enormous impact on these women – they have been able to upskill, access employment support, participate in employment academies as well as self-employment programmes. These programmes are making a difference and unfortunately with the current budget they will disappear. Demographic trends indicate an ageing and more diverse society which will have a significant impact on the labour market. The provision of sufficient employment support is crucial to mitigate such impact to help older people enter and remain in the workforce for longer. Audit of Inequalities accepts that ethnic minorities have ‘less developed social and economic networks and poorer job security. Employment support including upskilling, therefore is much needed to help these minority groups enter the labour market. The decision to withdraw</p>	

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		<p>Labour Market Partnership funding is the wrong one. Over the last year we have successfully founded our local partnership, engaging with a wide range of stakeholders, and building positive working relationships. Our members have given up their time as they truly believe in the LMP vision, that localised conditions require a flexible, local approach. This local approach is the message we have been promoting within our communities – it’s one that has been very much welcomed and declared long overdue. To pause the LMP programme now undermines this message and will cause long term, reputational damage to the LMP brand or any future DfC employability programmes. This is not a programme that can be turned off and on. As well as our partnership we have also recruited a team of three staff over the past year. These staff have built strong links as a team, with the partnership and other stakeholders, but most crucially with our communities. The relationships formed and the trust built has been critical to the successful implementation of our action plan throughout the last year. In the absence of funding the risk is that these staff will secure alternative employment and accordingly these relationships will be lost. Moreover, the skills and expertise of the team will be lost. Relationships have also been formed with all other LMP’s as well as the regional DfC team who have invested considerable time and resources launching the initiative. In the current environment we understand that a reduction of funding is unavoidable. Therefore, our proposal is that LMP’s progress with a reduced budget, for example 50%. This will allow the work of the LMP to continue and avoids enduring damage to the programme. The current 2023/24 Budget will have a devastating impact. The lack of sufficient employment support and relevant interventions will disproportionately impact those most vulnerable in our society. The situation is compounded by the recent removal of ESF funding. We appreciate the difficulty making these decisions however when a cost-benefit analysis is considered, the withdrawal of LMP funding is counterproductive. This will put considerable strain on other DfC resources, such as Jobs and Benefits Office staff.</p>	

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		<p>In the absence of LMP funding, council staff will secure alternative employment and the skills & expertise is lost.</p> <p>3.14 The Audit of Inequalities is evidence of the serious damage the proposed 2023/24 budget will have on Section 75 groups. The document provides a clear overview of the issues affecting these groups however, it is important to highlight that some aspects could be developed. For example, the Audit recognises that the Disability employment gap is higher in NI than elsewhere in the UK, however it does not emphasise the significant divergence in figures. In 2020 the disability employment gap for NI was 42.2pps, compared to 27.9pps for the whole of the UK. This is a substantial difference and one that needs to be urgently addressed through the provision of adequate employability support for Disabled people. The impact of the 2023/24 Budget will compound levels of deprivation in in disadvantaged areas where many are furthest from the labour market. As well as the Labour Force Survey, other recent NISRA publications provide useful and up to date data in relation to Section 75 categories. Consideration should be given for example to the 2021 Census results. These figures reflect demographic trends in successive surveys – we are an ageing and more diverse society. The working age population (16-64 years) of Causeway Coast and Glens is projected to decrease by 29.4% or 13,002 persons from 2018 to 2043. An older workforce will have a significant impact on the labour market and therefore the provision of sufficient employment support is crucial to mitigate such impact. These programmes will help older people enter and remain in the workforce for longer.</p> <p>3.15 Pausing of funding for about Market Partnerships will cause adverse impacts across Section 75 groups, especially in the context of the removal of European Social Fund funding, replace by significantly smaller financial pot int</p>	

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		<p>the Shared Prosperity Fund. The proposal to pause this work, means that essential pre-employment and employment support services, will be thwarted, creating an adverse impact to older workers, particularly returners, many of whom have dependants, are living with a disability and are women. Given our ageing population and falling birth rate, LMP funding is vitally important that older workers are supported to remain or return to work and mature candidates are supported to seek and stay in employment, in order to help them have enough income, stay connected and have a fuller working life. The current policy proposal to pause Labour Market Partnerships undermines support for older workers, and we are disappointed to see the no specific mitigations have been proposed in the EQIA.</p> <p>3.16 The Department’s Audit of Inequalities identifies young people (18-24 year olds) as having the lowest working age employment rates and the highest rates of unemployment and economic inactivity. This is more acute in NRAs.</p> <p>3.17 Costs for the delivery of employment programmes which can help woman into training and employment are escalating. Costs for trainers, childcare, room hire, and refreshments have gone up more than 15%. Despite this budget remain the same in monetary terms which means actual cuts to services.</p> <p>3.18 Cuts to the Employment Support budget will have an adverse impact on our delivery of interventions to address skills gaps and in developing inclusive employability programmes.</p> <p>3.19 Cuts will impact on those with disabilities, those of working-age, women seeking to re-enter the labour market and will impact differentially across religious/political beliefs.</p>	

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		<p>3.20 While DfC’s EQIA assessment has stated that they believe the reduction in funding will have an impact on Section 75 groups we believe that this has been underestimated for some of them, specifically: Religious Beliefs, Racial Groups, Age and Women.</p> <p>3.21 The proposed cuts to the employment support budget will impact upon the Department’s obligations in respect of the right to work. In particular, the proposal to pause resourcing to the Labour Market Partnerships from 1 July 2023 onwards will inevitably adversely affect those experiencing barriers to the labour market. This includes people with disabilities, children and young people, women, migrants and minority ethnic communities. Further, the rising cost of living means that older people are more likely to seek to return to work and need access to support to re-train or upskill. The implications of this measure are particularly concerning in the context of the loss of the European Social Fund and the ongoing issues with the UK Shared Prosperity Fund. The cumulative impact of funding reductions to employment support services is likely to result in the weakening of measures that promote inclusivity, non-discrimination, and equal access to work in NI. In this context, the NIHRC emphasise the vital role of third sector organisations who enable and provide access to essential services, particularly for marginalised people who face significant barriers. The NIHRC would highlight that the right to work, as a minimum, requires “deliberate, concrete and targeted” steps that combat discrimination, promote equal access and monitor progress, particularly for disadvantaged individuals and groups. In accordance with Article 2 ICESCR, the Department should demonstrate that every effort has been made to use all resources that are at its disposal to satisfy, as a matter of priority, the minimum essential levels of the right to work. The NIHRC recommends that the Department for Communities maintains targeted programmes that ensure access to, retention of and advancement in the labour market, particularly for</p>	

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		<p>people with disabilities, young people, women, migrants, older people and those living in rural areas.</p> <p>3.22 Concern over the ending of the European Social Funding as a result of Brexit, without a replacement and the pausing of Labour Market Partnerships while the north continues to have the lowest wages, lowest economic growth, lowest productivity, and highest economic inactivity compared with other jurisdictions on these islands.</p> <p>3.23 Cuts to Programme budget will have an adverse impact on our delivery of interventions to address skills gaps and in developing inclusive employability programmes It will severely hamper our city’s ambitions in:</p> <ul style="list-style-type: none"> • Creating inclusive pathways to jobs and careers by 2030 for those further back in the labour market and cut access to better jobs for those who are underemployed; • Reducing the proportion of economically inactive people of working age (by 2030 to 23 per cent from 30.1% in 2020), in alignment with the Belfast Agenda; • Cutting the proportion of the Belfast working-age population with no qualifications to 12%, reducing the working-age economic inactivity rate (excluding students) within the city to 18% and increasing the working age population who have attained Level 3-5 qualifications to 56% as well as doubling the number of Belfast residents entering the labour market each year with mid-level skills (at NQF levels 3-5). 	

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		<ul style="list-style-type: none"> • Reducing the proportion of working age population with no qualifications from 14.2% in 2017 to 10% by 2030, in alignment with the Belfast Agenda . The Belfast Agenda 2015-2035 sets out key strategic ambitions for the city. Working and Learning is one of the key priorities of the agenda which acknowledges that our skills base is vital to competitiveness, productivity, inclusiveness, and growth. • Supporting the inclusive growth • ambitions of the Council by targeting interventions on key cohorts: young people not in education, employment or training (Proportion of school-leavers entering employment, education or training), residents not in employment, residents with low skills levels (this will be measured by the proportion of working age population who have attained Level 2 or above) and in work, low earning residents. <p>3.24 Loss of ESF and the reduction of funding for LMPs comes at a time when the employability and skills sector in Belfast has been decimated with a significant number of targeted interventions and supports lost. Particular impacts for:</p> <ul style="list-style-type: none"> • Religious Belief/Political Opinion – particularly south and east Belfast will be more adversely affected due to the poor uptake of employability and skills support in these areas; • Racial group – Belfast is a more racially diverse Council than many others. With the reduction of ESF funding and the implementation of UKSPF funding which has limited target groups (economically inactive) racial groups, including those who are migrants or refugees may be impacted more adversely as there is no LMP funding to help support them into employment. 	

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	Theme	Summary Comment / Points Raised	Response
		<ul style="list-style-type: none"> • Men and women generally – Women may be more adversely impacted especially women who want to engage in employment and skills development in non-traditional skills, sectors, jobs. ESF funding had numerous projects which was directly targeted at women helping them to return to employment or skill/re-skill for new jobs. Current UKSPF funding has 2 projects which specifically target women (1 of which is NI wide). These projects have a narrow focus on only women who are economically inactive but have no consideration for women who may be unemployed or under-skilled and need help to skills up or re-train. LMP funding would have allowed this type of activity. Also as women tend to take up roles in caring, etc. and this might lead to a lack of opportunity for them. • Age – While DfC mention the impact on young people there is no mention of the older people who may need to return to work, re-skill for new work, etc. The cost-of-living crisis and other economic/social issues are driving older people back into work. Without LMP funding there are limited opportunities for these people to re-skill, re-train for employment. LMP funding would allow projects, etc to be developed to specifically support this target group. • People with Dependents – In Inner East Belfast there are 48% of 25-64 with no or low levels of qualification so reductions in LMP funding will have a disproportionate effect, particularly for those with dependents who will find it more difficult to gain the skills required to secure jobs which pay enough to cover childcare costs. and young people in terms of age discrimination. 	

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		<p>3.25 Unless there is additional funding provided by NI Departments, or from the Treasury, to address these shortfalls, there is a risk that this will result in a reduction in, or loss of, key pre-employment and employment services for these groups which will particularly impact on those most disadvantaged and/or furthest from the labour market.</p> <p>3.26 We stress that the provision of employment support is particularly important for women and therefore any cuts in these areas will have greater negative impacts for women.</p> <p>3.27 Women will experience greater adverse impacts due to a lack of funding to provide employment support because they are more likely to experience barriers to employment and are more likely to be economically inactive.</p> <p>3.28 We know from the Audit of Inequalities that young people between 16-24 are more likely to be unemployed thus the reduction in services will impact on their ability to access employment. Additionally, we know that those economically inactive are more likely to be female again highlighting adverse impact as support services are cut.</p> <p>3.29 Economic Activity and Economic Inactivity by religion have not been included. Neither is there reference to the rate of unemployment by religious grouping. This data would be required to ascertain what the potential adverse impacts of the further roll out of Universal Credit and the closing of the Jobs and Benefits offices one day a week. Indeed, the impact of the cut in funding for the Labour Market Partnerships will have a disproportionate effect on those of a Catholic background as there are more in this category searching for employment.</p>	

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		<p>3.30 To cut this service will hamper the Councils and the community sector’s ability to create inclusive pathways to jobs and careers by 2030 for those further back in the labour market and cut access to better jobs for those who are underemployed; reduce the proportion of economically inactive people of working age.</p> <p>3.31 Cuts to LMP funding are likely to have a particularly adverse impact on this grouping and reduce the city’s ability in meeting Belfast Agenda refresh (draft) target to reduce the disability employment gap within the city from 37% to 31% by 2026. Where funding is to be removed, Belfast City Council queries what mitigating actions will be put in place. Cuts to LMPs severely hamper our city’s ambitions in:</p> <ul style="list-style-type: none"> • Creating inclusive pathways to jobs and careers for those further back in the labour market and cut access to better jobs for those who are underemployed. • Reducing the proportion of economically inactive people of working age. • Cutting the proportion of the Belfast working-age population with no qualifications, reducing the working-age economic inactivity rate (excluding students) and increasing the working age population who have attained NQF levels 3-5. • Supporting the inclusive growth ambitions of the Council by targeting interventions on key cohorts: young people not in education, employment or training, residents not in employment, residents with low skills levels (this will be measured by the proportion of working age 	

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		<p>population who have attained Level 2 or above) and in work, low earning residents.</p> <p>3.32 We would also strongly urge DfC to reconsider planned cuts, ensuring there are no plans to pause or reduce disability / disability employment strategies that are already in train. Mencap acknowledge there will be a shortfall in provision for some disabled people through the proposed reduction in Labour Market Partnerships. However we have not seen evidence of these providing significant levels of person-centred supports to those furthest removed from the workplace. We would therefore recommend a thorough evaluation of LMP's, to assess their impact and explore the most suitable options going forward.</p> <p>3.33 Cuts to Programme budget will have an adverse impact on our delivery of interventions to address skills gaps and in developing inclusive employability programmes It will severely hamper our city's ambitions in:</p> <ul style="list-style-type: none"> • Creating inclusive pathways to jobs and careers by 2030 for those further back in the labour market and cut access to better jobs for those who are underemployed; • Reducing the proportion of economically inactive people of working age (by 2030 to 23 per cent from 30.1% in 2020), in alignment with the Belfast Agenda; • Cutting the proportion of the Belfast working-age population with no qualifications to 12%, reducing the working-age economic inactivity rate (excluding students) within the city to 18% and increasing the working age population who have attained Level 3-5 qualifications to 56% as 	

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		<p>well as doubling the number of Belfast residents entering the labour market each year with mid-level skills (at NQF levels 3-5).</p> <ul style="list-style-type: none"> • Reducing the proportion of working age population with no qualifications from 14.2% in 2017 to 10% by 2030, in alignment with the Belfast Agenda . The Belfast Agenda 2015-2035 sets out key strategic ambitions for the city. Working and Learning is one of the key priorities of the agenda which acknowledges that our skills base is vital to competitiveness, productivity, inclusiveness, and growth. • Supporting the inclusive growth ambitions of the Council by targeting interventions on key cohorts: young people not in education, employment or training (Proportion of school-leavers entering employment, education or training), residents not in employment, residents with low skills levels (this will be measured by the proportion of working age population who have attained Level 2 or above) and in work, low earning residents. <p>3.34 Loss of ESF and the reduction of funding for LMPs comes at a time when the employability and skills sector in Belfast has been decimated with a significant number of targeted interventions and supports lost. Particular impacts for:</p> <ul style="list-style-type: none"> • Religious Belief/Political Opinion – particularly south and east Belfast will be more adversely affected due to the poor uptake of employability and skills support in these areas; • Racial group – Belfast is a more racially diverse Council than many others. With the reduction of ESF funding and the implementation of UKSPF funding which has limited target groups (economically inactive) 	

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		<p>racial groups, including those who are migrants or refugees may be impacted more adversely as there is no LMP funding to help support them into employment.</p> <ul style="list-style-type: none"> • Men and women generally – Women may be more adversely impacted especially women who want to engage in employment and skills development in non-traditional skills, sectors, jobs. • Age – While DfC mention the impact on young people there is no mention of the older people who may need to return to work, re-skill for new work, etc. <p>3.35 While the funding for Belfast LMP would in no way cover the loss of ESF funding it would have allowed the LMP to assess the reduced European funding impact on the city in terms of residents, groups, etc who are not eligible for support under UKSPF funding and begin to formulate plans or put in place some sort of provision to support these residents. While DfC’s EQIA assessment has stated that they believe the reduction in funding will have an impact on Section 75 groups we believe that this has been underestimated for some of them, specifically:</p> <ul style="list-style-type: none"> • Religious Belief/Political Opinion – we believe that areas of the city (particularly south and east) will be more adversely affected due to the poor uptake of employability and skills support in these areas. This by the political/religious make-up of these areas means that these those of a particular religious belief/political opinion will be more adversely affected than those from North/West Belfast. • Racial group – Belfast is a more racially diverse Council than many others. With the reduction of ESF funding and the implementation of 	

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		<p>UKSPF funding which has limited target groups (economically inactive) racial groups, including those who are migrants or refugees may be impacted more adversely as there is no LMP funding to help support them into employment.</p> <ul style="list-style-type: none"> • Men and women generally – Women may be more adversely impacted especially women who want to engage in employment and skills development in non-traditional skills, sectors, jobs. ESF funding had numerous projects which was directly targeted at women helping them to return to employment or skill/re-skill for new jobs. Current UKSPF funding has 2 projects which specifically target women (1 of which is NI wide). These projects have a narrow focus on only women who are economically inactive but have no consideration for women who may be unemployed or under-skilled and need help to skills up or re-train. LMP funding would have allowed this type of activity. Also as women tend to take up roles in caring, etc and this might lead to a lack of opportunity for them. • Age – While DfC mention the impact on young people there is no mention of the older people who may need to return to work, re-skill for new work, etc. The cost-of-living crisis and other economic/social issues are driving older people back into work. Without LMP funding there are limited opportunities for these people to re-skill, re-train for employment. LMP funding would allow projects, etc to be developed to specifically support this target group. <p>3.36 Cuts to LMP funding are likely to have a particularly adverse impact on those with a disability and reduce the city’s ability in meeting Belfast Agenda2 refresh (draft) target to reduce the disability employment gap within the city from 37% to 31% by 2026.</p>	

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		<p>Data on various age bands identifying disadvantage at both a regional and local government level needs to be incorporated within the EQIA and factored into budgetary decision making. This information is required to thoroughly examine how budgetary cuts will impacts age bands 24+ and specifically, older workers.</p> <p>With a reduction of funding for LMPs support for actions targeting migrant populations will be reduced and therefore adversely affect those in our city who are from ethnic minorities.</p> <p>DfC to consider further mitigations across their proposals as the current mitigations will not stop adverse impacts across a range of Section 75 groupings and those experiencing poverty, multiple deprivation and further from the labour market.</p> <p>Cuts to DfC's budget will have an adverse impact on our delivery of interventions to address skills gaps (Action 6) and in developing inclusive employability programmes (Action 7). Where funding for LM's is to be removed, Belfast LMP queries what mitigating actions will be put in place.</p> <p>Cuts to LMP will specifically impact on those who are economically inactive and those who have low skill levels and/or no qualifications which cut across all Section 75 groups.</p> <p>With the reduction of funding for Belfast LMP, the potential to adversely affect support for enterprise growth and development is diminished and therefore a greater number of individuals who need help to start or develop their business is reduced to allow Belfast city to grow its micro businesses in line with the NI average of 25.5%.</p>	

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		<p>The reduction of funding for LMPs comes at a time when the employability and skills sector has been decimated with a significant number of targeted interventions and supports lost.</p> <p>Ceasing LMP funding will disadvantage the most economically and socially deprived residents of Belfast.</p> <p>The impact of the reduction of funding should not only be assessed in terms of Section 75 but also in terms of the groups of people who, by their social/economic background, will be affected the most by budget cuts to LMP.</p> <p>3.37 Differential adverse impacts on S75 disability, women & ethnic minority groups have been identified as requiring tailored programmes to achieve equitable access to the labour market.</p> <p>3.38 No funding to replace ESF support and LMPs has a substantial adverse effect on DfC Policy areas regarding the needs and issues of disabled people to gain employment and employers to recruit disabled people.</p> <p>3.39 Workable NI Jobsearch Element Payment 23/24 has been withdrawn without consultation. This is in contradiction to the Department's current Workable NI Guidelines for 23/24.</p> <p>3.40 EQIA references USEL Ltd at 7.iv, as the largest provider of support for people with disabilities and health conditions to move into work, the removal of Jobsearch Element Payment from Workable NI prevents USEL Ltd from continuing this work— the EQIA is therefore incomplete and incorrect as a result of this decision.</p>	

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		<p>3.41 The EQIA has mentioned young people, but not older people. Ards and North Down has the highest percentage in Northern Ireland of people aged over 65 at 22.1%. The EQIA therefore does not take into account the fact that these individuals, some of whom have consideration experience and knowledge, can contribute on a voluntary basis to some mentoring programmes aimed at helping younger people to reconnect with work and training. Additionally, there could be opportunities for these people to reskill and retrain and return to the work force, particularly in light of the cost-of-living crisis.</p> <p>3.42 The EQIA does not address the section Men and Women and has failed to comment on the adverse effect that the proposal to withdraw funding to the LMP would have on women and single parents or people with caring responsibilities. The programmes run by the LMP, such as Academies, provide a “Barrier Removal” element which can be used by women and people with caring responsibilities to access training and employment, knowing that their dependants are being cared for professionally, freeing time for them to work or learn.</p> <p>3.43 The EQIA does not address Ethnic minority groups such as newcomers from outside of Northern Ireland. In the current geo-political situation, newcomers have arrived in Northern Ireland seeking to contribute to the local community and economy. The LMP, through its work, is a vehicle to engage with potential employers and organisation to facilitate integration in the local economy.</p> <p>3.44 With the proposal removal of the LMP, the most vulnerable groups in our council area are at risk of being further pushed into poverty and economic inactivity as the support currently and previously available will not be there to address their needs.</p>	

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	<p>3.45 At 24%, Mid-Ulster District Council has the lowest employment rate for disabled people in Northern Ireland. There is a large and significant difference between Mid Ulster and other Council areas – the highest ranked Council (Lisburn & Castlereagh) has double (48%) the disability employment rate of Mid Ulster. Therefore the ‘pausing’ of this project has a direct negative impact on people with a disability who require support to enter the labour market. This seems like a particularly punishing removal of a service which has been long requested by organisations who support people with a disability and knowing the release the negative impact of long-term isolation from the labour market can have for people with a disability.</p> <p>3.46 In 2021 Mid-Ulster had the lowest employment rate for women in Northern Ireland. At 61% it is considerably below the Northern Ireland average of 68%. Therefore, it is hard to justify the ‘pausing’ of the project that directly aims to have a positive impact upon economically vulnerable groupings.</p> <p>3.47 In terms of Labour Marketing Partnerships Economic Activity and Economic Inactivity by religion have not been included. Neither is there reference to the rate of unemployment by religious grouping. This data would be required to ascertain what the potential adverse impacts of the further roll out of Universal Credit and the closing of the Jobs and Benefits offices one day a week.</p> <p>3.48 End of ESF funding and no support for Labour Market Partnerships would remove key interventions to assist people to upgrade skills and improve their lives take place.</p> <p>3.49 Given the unique budgetary pressures it is timely for the Department to review investment in current employment programmes including Labour</p>	

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		<p>Market Partnerships to ensure that there is no duplication of services and programmes, to identify gaps in funding and delivery mechanisms and ensure impact for those furthest removed from the workplace.</p> <p>3.50 The loss of funding for Labour Market Partnerships will impact on older people. With an aging population this must be taken into consideration as there may be an increasing need for this demographic to return to work or re-skill for new work due to the implications of the cost-of-living crisis. Persons of different age, persons with disabilities, persons with dependants and especially those that fall within more than one of these groupings, are all likely to be disproportionately affected by any loss of funding as they will have less opportunities to have the Council aid their referral. All such persons are also more likely to rely on specific programmes to combat isolation, hunger and warmth and are therefore more likely to suffer as a result of cuts across a range of services.</p> <p>3.51 The absence of LMP funding will have a devastating detrimental impact on the individuals and families who live in these areas, who experience multiple hardships, food and fuel poverty being most prevalent. Young people are at risk of paramilitary influence, which has a harmful effect on themselves, their family and the wider community. With an aging population Mid and East Antrim are also adversely affected by cuts in programmes that aim to mitigate the hardship of our older generation.</p> <p>The decision to pause funding for Mid & East Antrim Labour Market Partnership activity is expected to have a disproportionately negative impact on:</p> <ul style="list-style-type: none"> • People with disabilities: The Disability Employment Gap is more pronounced in Northern Ireland than any other UK region. 	

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		<ul style="list-style-type: none"> • Women: Many LMP academies are primarily of interest to unemployed and economically inactive women. • People from different racial groups: A series of engagement workshops to compile the LMP Action Plan 2023-2024 identified a need to provide additional employability support to minority groups and facilitate better linkages with employers. • People of different ages: Non delivery of certain LMP interventions are likely to disproportionately impact younger unemployed people and exacerbate NEET numbers within the Local Government District. 	
4	Homelessness	<p>4.1 The reduction in this funding has direct implications for a wide range of services that NIHE provides, particularly homelessness services. We hold grave concerns around the potential impact of cuts to this area. We have a sector of housing professionals standing ready to deliver the homes needed to assist the 16,000 people presenting as homeless to NIHE each year, to help provide homes for the 4,200 children currently housed in temporary accommodation but less can be achieved on the reduced budget figures. With the money made available to the SHDP from 2012, housing associations have achieved 97 per cent of their new build target and remain ready to continue to deliver. The ripple effect of this budget will see numbers of people at risk of homelessness increase because of:</p> <ul style="list-style-type: none"> • support required to help those into employment being reduced. • the cost of living crisis continuing while the money available for discretionary support grants is decreasing, and 	<p>The Department bid for funding to support Homelessness and its providers in 2023-24. This included bids for increased demand, inflationary pressures and uplifts for pay. Despite these bids, the Department received no additional funding in 2023-24 to address these pressures and the Department's overall Resource allocation was subject to reduction.</p> <p>The Department recognises the adverse impacts constrained budgets could have on critical homeless services and that there</p>

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		<ul style="list-style-type: none"> • the supporting people services dwindling due to funding cuts <p>4.2 We would point to two additional reports which have been published since the Audit was completed and should be considered:</p> <ul style="list-style-type: none"> • Homeless Connects Staffing Challenges within the Homelessness Sector research published in September 2022. If this survey is representative of the wider homelessness sector in Northern Ireland, and we have no reason to doubt its Consultation Response it would indicate that any cuts which fall on the sector would have a particularly negative impact on two section 75 categories: women and people from a Catholic background. • Experiences of Youth Homelessness. This research, produced on behalf of NIHE, highlights the negative impacts of homelessness on young people. The research provides valuable data on the impact of youth homelessness, including additional insights around a number of section 75 categories which intersect with age. <p>4.3 We are concerned that the reductions will have a devastating impact across the sector, destabilising efforts by statutory and third-party organisations and setting back progress made in COVID recovery and further entrenching the inequalities faced by many people experiencing poor housing and homelessness in an ever-deepening cost of living crisis. Specifically, the budget reductions will undercut the policy direction set in the NI Homelessness Strategy 2022-27 which is explicitly about homelessness prevention and the DFC Housing Supply Strategy.</p> <p>4.4 Housing Rights is expressly concerned about the impact of the proposed budget reductions on the NIHE’s capacity to deliver the 2022-27</p>	<p>is increased demand for Emergency Accommodation since the pandemic which is showing little sign of reducing. The proposed budget was therefore protected and has not been reduced from the 2022-23 position, despite the Department’s budget being reduced.</p> <p>The Department acknowledge Homelessness funding provides vital services and that the reduction will have adverse impacts on several of the groups protected by Section 75, as such consideration has be given to this when determining final budget allocations.</p>

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		<p>Homelessness Strategy, a strategy which is explicitly premised upon the need to prevent homelessness in the first instance. The NIHE Homelessness Strategy 2022-27 acknowledges throughout that the ability to successfully meet its objectives relies on an appropriate level of funding being made available. The pressure on NIHE’s budget to meet their statutory obligations is well evidenced and we are concerned that the budget allocation will place these obligations under further pressure. NIHE’s Homeless Strategy also acknowledges throughout its reliance on partnership working with a range of delivery partners in the wider housing and homelessness sector, with other organisations and projects reliant on funding from the NIHE as part of the Strategy delivery. This includes a number of projects which work to prevent homelessness which are delivered by Housing Rights.</p> <p>4.5 It will be virtually impossible to provide services to prevent homelessness, with the overwhelming proportion of the homelessness budget focused on response rather than prevention. The proposed draft budget comes at a time of unprecedented levels of homelessness; a 15% rise year-on-year in the number of households to whom the NIHE has the highest legal duty, i.e. ‘full duty applicants’. Perversely, failure to fund prevention services, will lead to greater numbers living in expensive temporary accommodation, leading to greater budgetary pressures over time. Indicative funding of £26.4m has been outlined, resulting in a funding shortfall for all homelessness services, of circa £7.4m.</p> <p>4.6 The number of households in temporary accommodation has exploded since the advent of Covid-19, rising from 2,065 in January 2019 to 3,945 in January 2023, an increase of 91%. This level of increase is unsustainable in terms of capacity and will place significant knock-on costs to the public purse through maintaining current Temporary Accommodation and obtaining new accommodation to meet fast-growing demand.</p>	

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		<p>4.7 By solely funding temporary accommodation, and not funding wraparound services, thousands of people experiencing homelessness may be without any support or advice. In our professional opinion this will leave many people exposed to repeat homelessness, as their temporary accommodation placements fail. The impact of this for other public services will be acute.</p> <p>4.8 The cumulative effect of the cost of living crisis and the proposed cuts, namely those to Social Security Delivery and Discretionary Support Grants, is likely to increase the number of people presenting as homeless. In 2021-22, there were 10,135 households accepted as statutorily homeless in NI, an increase from 9,889 households in 2020-21. This figure does not include the 'hidden homeless', cases who have had their application rejected or did not apply in the first place. This is particularly concerning in light of the marked increase in deaths of rough sleepers, particularly women, on the streets of Belfast.</p> <p>4.9 Review the administrative financial burden of multiple contracts and the required returns being expected of one service provider within the overall budget envelope. For example, Extern run 13 different contracts within its homeless portfolio of services. Returns are required for each and is a considerable resource and if thought could be given on how this can be reduced to ensure as much funding as is feasibly possibly goes to the people, we support who are most in need. Reduce/review/standardise administrative burden for project returns.</p>	
5	Housing	<p>5.1 We question the proposal being brought forward to simply impose a blanket 5% cut across all of the Arms-Length bodies. The right to housing is a fundamental human right set out in a wide array of international treaties and instruments. The NIHE, under the Housing (NI) Order 1988, has a legal duty to provide accommodation to households who are legally assessed to be homeless or</p>	<p>The Department recognises that this proposal will have adverse impacts on several of the groups protected by Section 75. This budget funds the Housing</p>

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		<p>threatened with homelessness. Consequently, they play a central role in upholding a fundamental human right for people living here.</p> <p>5.2 Housing Rights is also concerned by the proposed 5% cut to the 2022/23 baseline budget of the Northern Ireland Housing Executive (NIHE). Housing Rights notes that the proposal is to impose a budget reduction on last year's baseline budget, which will compound the difficulty for NI's only regional housing authority and the body with the lead role in NI's Homeless Strategy.</p> <p>5.3 Reduction in Funding to NIHE— will disproportionately impact those with dependents, with disabilities, in early working age (higher rates of homelessness), women at risk of domestic violence or abuse and LGBT persons who exhibit higher rates of homelessness.</p> <p>5.4 As we deliver and fund services to the most vulnerable in our society, a funding shortfall will undoubtedly have adverse impacts on several of the groups protected by Section 75. These programmes are:</p> <ul style="list-style-type: none"> • Energy Efficiency Grants; • Social Housing Development; • Homelessness (impacting the following services): • Community Based Support and Prevention Support Initiatives; • Homelessness Prevention Fund; • Housing First for Youth; • Complex Lives; • Supporting People; and • Travellers Sites Improvements, Maintenance and Running Costs 	<p>Executive Regional Services functions and the majority of these are either contractual, statutory in nature or being delivered following a Ministerial decision. As such there is limited scope to actively manage a reduction in financial resource requirements, without directly reducing services. This has been taken into consideration in the Department's final Budget allocations for 2023-24.</p> <p>With DfC facing a Capital funding gap of £59m in 2023-24, the Department acknowledges that managing a Capital pressure of this magnitude will undoubtedly have a significant and adverse impact on the Department's ability to meet demand for capital programmes which support public services in 2023-24.</p> <p>The Department has considered the points raised when prioritising its Final Capital budget allocations for 2023-24, while working with the NIHE to ensure allocation will be made in the most effective way</p>

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		<p>5.5 The majority of the Housing Executive Regional Services functions are either contractual, statutory in nature or being delivered following a Ministerial decision. As such there is limited scope to actively manage a reduction in financial resource requirements, without directly reducing services.</p> <p>5.6 Social housing helps people in need to sustain a good quality and affordable home. Our social housing sector is already struggling to meet its target number of homes due to the increased need and demand. With c45,000 people on our waiting list in NI against the reduced target number of new builds per year, many people will wait longer before their needs are met. We are concerned about the potential equality impacts of this policy on specific groups – there is a risk of perpetuating or exacerbating existing inequalities. The number of social homes that can be built would decrease due to diminished funds and social housing waiting list numbers are likely to rise.</p> <p>5.7 The cuts to social housing will impact on the number of proposed New Social Housing, leading to greater waiting lists, with people spending even longer times in temporary accommodation or alternative unsuitable accommodation, which will widen inequalities across Northern Ireland. We seek further information about the specifics of adverse impact and any evidence relied upon by the Department, together with proposals for mitigation action.</p> <p>5.8 A number of other specific proposals note potential adverse impact to Section 75 groups in general, which is unhelpful and at odds with the Department’s own Equality Scheme commitments. The EQIA references possible adverse impact of its proposal to close the Affordable Warmth Scheme to new applicants this year on “vulnerable, low-income households who are most at risk of fuel poverty” but provides no detail about which specific Section 75 groups. It is concerning that the EQIA fails to offer specific mitigations. Age NI believes that it is likely the proposed restrictions to the Affordable Warmth Scheme will</p>	<p>possible too support those most in need.</p> <p>The Department recognises the impact reduced funding could have on Section 75 groups and is fully supportive of progressing NI Housing Executive Housing Transformation.</p> <p>The Department’s Capital budget allocation in 2023-24 will support investment in new social housing supply.</p>

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		<p>adversely impact older people and persons with disabilities and others impacted by exposure to cold temperatures, living in fuel poverty and in older housing which is energy inefficient.</p> <p>5.9 Wider issues in housing include ageing housing stock; poor quality construction; smaller household sizes; poor insulation; high energy costs; poor quality and mismatched accommodation; frequent renovation; poor infrastructure; and negative environmental impacts. Alongside these issues, is the fact that people are living longer but with some form of illness and/or disability. Plans to prevent and respond to homelessness and housing distress amongst older people. In particular, plan for increased levels of poverty, numbers of people who are in private tenancy and implications of loss of income due to retirement and the economic impact of the COVID-19 pandemic. Age NI is concerned and seeks clarification on whether the proposed cuts to the NI Housing Executive budget will impact on implementation of its Older People’s Housing Strategy 2021/2 - 2025/6.</p> <p>5.10 The home safety service provides visits to properties within the Under 5 age and the over 65 age categories. The visits include advice/information to assist with preventing accidents in the home and includes the provision of equipment to aid in the prevention of injuries, such as door stops, stair gates, blind cleats, winter warmer packs and insulated mugs. If this service was to be impacted by funding, it could lead to greater number of accidents/incidents within the home and therefore greatly impact on an already under pressure health service.</p> <p>5.11 Proposed cuts to funding social housing (on 31 March 2022 there were 44,426 applicants on the social housing waiting list. Of these applicants, 31,407</p>	

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		<p>were in 'housing stress' and 10,135 households were accepted as statutorily homeless).</p> <p>5.12 The Department published its Intermediate Rent Policy in March 2023. Paragraph 21 of the policy document states, "The Department for Communities intends to separately provide financial support towards the development and letting of Intermediate Rent homes." However, there is no mention of funding for Intermediate Rent homes in the EQIA consultation document. Co-ownership is the only intermediate housing product mentioned in the document. To row back from funding Intermediate Rent homes would adversely impact many across the Section 75 groups, just as the budgetary pressures exacerbate the financial situations of many, thereby raising demand for affordable housing options. Affordable Housing Policies set out in Councils' Local Development Plans (LDP) offer greater opportunity to provide a mechanism for delivery of affordable housing units (social and intermediate). However, social housing starts are set to reduce under the 2023-2024 budget. It is uncertain how cuts to the DfC budget will impact upon the funding available to developers to develop social housing. Legislative changes to allow Registered Housing Associations to develop and rent Intermediate Rented homes may assist in increasing the affordable housing stock without requiring the same degree of capital spend from the Department.</p> <p>5.13 In the private rented sector in Northern Ireland, 48% (58,000) of all private renters rely on housing benefits to pay their rent with 83% experiencing a shortfall between their benefits and the amount of rent they pay. Local Housing Allowance is currently frozen, rental prices in Northern Ireland have risen by 9.9%, all during a relentless cost of living crisis. Tenants in the PRS are facing mounting affordability problems.</p>	

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		<p>5.14 A reduction in the Affordable Warmth Scheme budget (more information required in terms of the scale of the reduction and perhaps this represents an opportunity to review the effectiveness of the scheme).</p> <p>A reduction in funding towards Disabled Facilities Grants (this feels particularly punitive given the minimal savings compared to the detrimental impact on disabled people trying to live in their own homes).</p> <p>5.15 Reduction in Affordable Warmth funding will impact on the most vulnerable particularly during the COL crisis. Dept should consider any reduction given the linkage with Housing fitness, fuel poverty, health and educational attainment.</p> <p>5.16 We are particularly concerned about the implications of this budget for the construction of social housing. It is noted in this EQIA that if the split of capital allocations is in a similar proportion to 2022/23, then only 1,400 new social units can be delivered (rather than the current target of 2,000). Failure to build enough social homes in areas where they are most needed will have inevitable adverse impacts on section 75 groups, particularly with regards to religious belief. As the EQIA identifies, Catholic households already experience the longest median waiting times for social housing at the point of allocation in Northern Ireland as a whole. We are concerned that a failure to progress the building of social housing in areas of greatest objective need will only exacerbate existing inequalities.</p> <p>5.17 There are over 25,000 households on the social housing waiting list with homelessness status, it should be a top level priority of the NI Executive to see more social housing built. It is obvious that without an adequate supply of affordable homes in the right places, it is impossible to prevent and reduce homelessness. The cut outlined in the EIA from 2,000 social housing starts to 1,400 starts will have the impact of extending the ongoing housing crisis, with</p>	

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		<p>the social housing waiting list continuing to grow and more and more households with homelessness status being forced to wait longer for access to housing. Adequate housing is a prerequisite of being able to uphold other rights and being able to participate in society. A lack of adequate housing can have deeply detrimental impacts on a person’s physical and mental health, economic prospects and wellbeing. It is incumbent on the Northern Ireland Executive collectively and DfC specifically to uphold the fundamental human right to adequate housing.</p> <p>5.18 We welcome the suggestion that ‘The Department will seek to ensure that any available Capital funding made available during the year is allocated to Social Housing, as was the intention of the previous Executive.’ (p 28) However, we strongly urge the Department to ensure that the targets are met, because any reduction will have a detrimental effect on many people, but particularly on three Section 75 groups:</p> <ul style="list-style-type: none"> • Children and Young People - Northern Ireland is facing a housing crisis, which affects children and young people in particular. Our research into the latest homeless statistics has revealed that the number of homeless children in NI has risen by more than a fifth in the last two years. The latest NIHE figures for the end of March 2023 showed 45,105 households on the waiting list, with amongst them at least 26,567 children under 18. The 26,310 NI households officially recognised as FDA homeless in March 2023 included at least 17,111 children under 18 – a rise of 23% on the same figure two years earlier. • People from Black and Minority Ethnic Groups, including Refugees and Asylum Seekers - Lack of adequate social housing also affects people from Black and Minority Ethnic Groups, including Asylum Seekers and Refugees, who face additional barriers to accessing affordable homes. 	

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		<p>The published Home Office statistics for March 2023 reveal that there are 3,030 asylum seekers in all forms of accommodation in Northern Ireland. Asylum seekers who are living in hotels, provided by private provider Mears, will need to be housed once they achieve refugee status.</p> <ul style="list-style-type: none"> • People with different religious beliefs – Our analysis of Housing Executive data on Full Duty Applicants in Belfast, which demonstrated that there were 8,118 FDA homeless households in Belfast in March 2023, up 7.6% from March 2022. The data provided indicates that these households included at least 5,049 children under 18 – an increase of 13% on March 2022 figures. Two thirds of them live in predominantly Catholic areas in West and North Belfast: at least 2,197 in West and at least 1,184 in North. <p>5.19 Northern Ireland is in a housing crisis. The demand for housing far outstrips availability across all tenure’s private sale, private rental and social housing. Rise in demand comes from a range of factors, from changing demographics and family size to personal circumstances resulting in increasing homelessness. What is clear is that we need to ensure that action is taken to address the rising demand. Having a decent home should be a basic human right, and it impacts on educational and employment outcomes, as well as having a significant impact on health and well-being. Social Housing now more than ever has a vital role in housing, providing homes for those most in need at an affordable level. We have more than 45,000 on the housing waiting list, with 33,000 in housing stress. Housing Associations have a long track record in creating new homes, and 2022/23 was an important step in surpassing the Departmental targets for completions and new starts. However, we realise that with increased numbers of new homes being completed the waiting list is still rising, so carrying on with current targets is not going to tackle the issue in any</p>	

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		<p>sustainable way. There are key issues facing the development of more social housing, but central to this is funding. Last year housing associations maximised the budget provided by the Department underspend of the 184.4m budget was just 208,773, at a time when there has been more than 460m underspend across the NI budget since 2016/17. Housing Associations make this go further by providing match funding from private finance. To increase the number of homes to be built will require an increase in the budget provided it is a simple fact that there is a cost to building homes, one that has faced dramatic increases in recent years, and housing associations are dedicated to providing quality homes. The aspiration of completing more than 2,200 social homes each year has the full support of the sector, and NIFHA members want to see that achieved and are ready to deliver. In the current climate budgetary decisions are difficult, but there is real concern that any reduction in the Social Housing Development Programme budget will have a serious, detrimental long-term impact on thousands of families on waiting lists and wider society. To increase delivery of new homes to the necessary 2,200 per year, the SHDP budget would require a rise of 10% on the current budget which equates to 608.5m over the next three years.</p> <p>5.20 Cuts to Housing will exasperate housing stress. Housing led regeneration policy contributes to reversing the physical, social, and economic decline of neighbourhoods, towns and city centres and the delivery of homes offers significant opportunities to help achieve balanced communities through well-linked, accessible, inclusive, mixed-tenure neighbourhoods.</p> <p>5.21 We believe that there is an urgent need for more social housing to be built, to provide people with high quality, affordable homes, and to reduce long term reliance on private rental accommodation. Any reduction in the provision of social housing in North Belfast will have a detrimental impact on all section 75 groups.</p>	

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		<p>5.22 In ‘New Decade, New Approach,’ a commitment was made for a Programme for Government which included an outcome which provided “specific focus on ensuring every household has access to a good quality, affordable and sustainable home that is appropriate for its needs.” The proposed budget reductions will do irreparable damage towards this position.</p> <p>5.23 Housing Rights is particularly concerned that the stated impact of the reductions will mean a cut to the number of new Social Housing Units being built by 600 units. This will mean only 1400 units instead of the 2000 units originally targeted. The five-year projected need for new social homes in Northern Ireland for the period 2022-27 is 23,557. This reduction in new builds will have a detrimental effect on meeting that target. The implications of not appropriately addressing housing supply are far reaching.</p> <p>This proposal will undercut efforts to address the social housing waiting list, which as of March 2023 stood at 45,105 households regrettably this number will not remain static. The cumulative effect of the cost-of-living crisis and proposed budget reductions elsewhere in public services (including the reduction in the Discretionary Support budget) will see an increase in the number of people finding difficulty affording to stay in their homes and may therefore result in an increase in homeless presentations.</p> <p>Housing Rights would urge the Department to consider how this impact may be mitigated. It is particularly important that the Department strengthen, not weaken efforts to prevent homelessness and sustain tenancies, by ensuring access to housing advice services, financial and other support to sustain tenancies. Failure to do so will have a human and financial cost to society with conservative estimates of the cost of each case of homelessness estimated to range from £4,972 to £36,119 per year. The EQIA should expressly identify the Section 75 groups most likely to be affected by this budget reduction</p>	

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		<p>and how the impact may be mitigated. While we acknowledge that any surplus Capital DEL (Departmental Expenditure Limits) which emerges will be allocated to social housing, the dire circumstances as laid out by the EQIA make this scenario unlikely. We therefore ask the Department to work proactively with housing providers to maximise new build social housing developments as a priority.</p> <p>5.24 Affordable Warmth— likely to disproportionately impact older persons, lone parents and those with disabilities at greatest risk of fuel poverty.</p> <p>Private Sector Grants— cut will impact disproportionately on those with disabilities and potentially older people.</p> <p>Urban regeneration programme— will impact on accessibility with a disproportionate impact on those with disabilities, also younger people who may find employment through hospitality sector growth following investment.</p> <p>5.25 A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived wards in East Belfast such as Ballymacarrett and Woodstock.</p> <p>5.26 Proposal to close the affordable warmth scheme to new applicants is also likely to disproportionately impact both the deaf and visually impaired community as they will have been less aware of the scheme and/or been in a position to apply.</p> <p>5.27 Concern over the potential pausing of the Affordable Warmth Scheme, which is the Executive’s main intervention to support people on a low income</p>	

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		<p>who rent their home from a private landlord and who are most at risk of fuel poverty.</p> <p>5.28 We are concerned that this reduction will impact on the ability of the Department to meet its Vision as set out in the HSS, and the City’s ambition as set out in (the Community Plan for the City) which focuses on inclusive growth where no one is left behind. The Belfast Agenda is currently undergoing a statutory refresh, this includes a priority area of Housing Led Regeneration with the focus on increasing housing supply across all tenures, reducing social housing projections by increasing the provision of social homes through the Social Housing Development Programme and increasing the number of people living in the city centre across all tenures. Impact on those already in housing crisis and housing stress will be exasperated and also wider given that the investment in housing stock has the potential to address a number of economic and social problems. We believe that housing led regeneration policy contributes to reversing the physical, social, and economic decline of neighbourhoods, towns and city centres. The delivery of homes offers significant opportunities to help achieve balanced communities through well-linked, accessible, inclusive, mixed-tenure neighbourhoods.</p> <p>5.29 The provision of high quality, affordable social housing in areas of multiple deprivation is essential if the evidenced issues associated with poverty are to be addressed. This is particularly true in North Belfast where there is a chronic shortage of affordable, quality social housing. Any reduction in the provision of social housing in North Belfast will have a detrimental impact on all section 75 groups.</p> <p>5.30 A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived DEAs. The reduction in the budget available to the</p>	

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		<p>NIHE could impact progress in terms of the good work to date under the auspices of Community Planning and the Housing Led Regeneration Group Impact on those already in housing crisis and housing stress will be exasperated and wider given that the investment in housing stock has the potential to address several economic and social problems.</p> <p>Affordable Warmth— any reduction to this scheme will have a negative impact on those most vulnerable in society.</p> <p>Private Sector Grants and Major Adaptations - any reduction on service will have a detrimental impact on areas of deprivation which have been identified by NISRA. The impact of these multiple cuts will be worst felt by the people living in these areas and the most vulnerable.</p> <p>5.31 Housing and affordable/sustainable energy. The EQIA indicated that the funding for the Housing Supply Strategy would be reduced, leading to fewer new homes to reduce the growing waiting list for social housing. Similarly, the EQIA also indicated that the Affordable Warmth Scheme and Housing Adaptations budgets could be cut, all of which would have negative impacts on disadvantaged children and young people.</p> <p>5.32 It is understood by Ards and North Down Borough Council that the decision to terminate the Service Level Agreement between Councils delivering the Affordable Warmth Scheme has already been made with a final termination date of 31st August. The Council is disappointed both with the decision itself and the timing during to the decision having been made and communicated during this consultation period. Vulnerable people within the Borough will not avail of the service without the local knowledge and support. There are concerns that with direct applications to NIHE that the existing equal shared allocation of funding across the 11 Councils will now not take place as some</p>	

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		<p>Councils have extensive waiting lists whereas the vulnerable clients in Ards and North Down are harder to reach.</p> <p>5.33 Upper Andersonstown Community Forum would highlight that the recent “Housing Supply Strategy (HSS) Consultation” proposed the vision that ‘Every household has access to a good quality, affordable and sustainable home in a thriving and inclusive community that is appropriate for its needs’. They supported this Vision, and a reduction to the NIHE budget will significantly impact on the Department’s previously agreed Vision on Housing Supply. Undoubtedly, the reduction in the budget to the NIHE is going to impact some of the most vulnerable in our society – those experiencing homelessness and housing stress from some of the most deprived DEAs in our city.</p> <p>5.34 Insufficient social housing stock can have serious implications in domestic violence situations leaving victims (68% of victims are female) trapped in coercive and abusive situations as they have nowhere to go. The ability of survivors of domestic abuse to rebuild their lives can be severely limited by a lack of suitable housing which is appropriate for their particular needs including the needs of disabled women.</p> <p>5.35 We again suggest that any cuts to help address fuel poverty including to the Affordable Warmth Scheme will have greater adverse impacts for women.</p> <p>5.36 The NIHRC is concerned by the proposed cuts to the 2022/23 baseline budget of the NI Housing Executive and the impact this will have on the development and maintenance of social housing. NI’s social housing sector continues to struggle to meet its targets for housing provision and cope with increased need. On 31 March 2023, the number of applicants on the social housing waiting list was 45,105. Of these applicants, 32,633 were in housing stress. Any reduction in funding is likely to have an adverse impact on those</p>	

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		<p>most vulnerable to poverty, social exclusion and homelessness, including households with dependents, with disabilities, women at risk of domestic violence and LGBTQI+ persons. Beyond the immediate need for new social housing, there are a number of other issues facing the sector that need to be addressed and any reduction in capacity is likely to limit progress. For instance, there is no up-to-date housing supply strategy for NI and a lack of comprehensive equality data on housing. Social housing continues to be allocated on a points-based system, which determines applicant's position on the waiting list. The current definition for intimidation points excludes domestic violence, coercive control, or intimidation due to nationality. There is also no official appeals mechanism, and the informal complaints procedure is lengthy and exacerbates harm on already vulnerable households. The NIHRC recommends that the Department for Communities maintains and prioritises adequate funding to the housing sector and takes appropriate mitigating measures to address waiting lists and prevent homelessness. Particular consideration must be afforded to those living in unfavourable conditions in NI, in accordance with Article 11 of ICESCR and Article 8 of ECHR.</p> <p>5.37 The Department has informed Councils on 01 June that it has decided to remove targeting from the Affordable Warmth Scheme due to pressures placed on both capital and resource budget for 23/24. Continuation of the scheme is welcome however, the new delivery model may not now target and assist those most likely to be living in the most severe fuel poverty. It is important that the Department continues to develop policy and implements programmes to mitigate the effects of fuel poverty of low-income households across NI.</p> <p>5.38 The decision to move management of the Affordable Warmth Scheme from local councils to NIHE will have extremely negative implications with many vulnerable people losing out on a grant that can be vitally important to their physical and mental well-being. The level of time and hand holding for some</p>	<p>With DfC facing a Capital funding gap of £59m in 2023-24, the Department acknowledges that managing a Capital pressure of this magnitude will undoubtedly have a significant and adverse impact on the Department's ability to meet demand for capital programmes including the Social Housing Development Programme. Nonetheless it will put in place for the Programme a target as close as will be possible to 2,000 social new build starts.</p> <p>The Department's Capital budget allocation in 2023-24 will support investment in new social housing supply to the maximum extent possible. The majority of available capital will be used to build more social housing. The Department will consider ways to retain momentum in the Development Programme.</p>

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		<p>cases is significant and it is doubtful that NIHE will be offering the very personal approach provided by Local Councils now that it will be carried out on an application-based process. Also, the lack of other sign-posting and onward referrals will likely not be offered.</p> <p>5.39 The completion of the application and the collection of all relevant documents will be difficult for people with low education abilities and put pressure on applicants with depression and mental health problems. The likelihood of the elderly being able to scan information and send via email will be low. Elderly and vulnerable people will be hesitant to send sensitive information such as bank statements or proof of ownership such as deeds via the post. Whereas, applicants were more content with passing that information to the affordable warmth officer in their local council who they have built up a relationship with.</p> <p>5.40 Affordable Warmth as an area with high increasing numbers of seniors, we have saw the benefits of the affordable warmth scheme highlight the recommendations within the Innovation and Inclusive Growth, reset for growth Report that articulated levers currently absent which would assist in housing delivery at scale. Particularly around the need for structural models to support public-private collaboration and Housing Investment Funds. The Affordable Warmth Scheme prioritises those most vulnerable who are living in substandard conditions. Many of these people live in Areas of Multiple Deprivation. Any reduction to this scheme will have a negative impact on those most vulnerable in society. AW has been a success in Belfast and provides the whole house approach providing fully funded support to the most vulnerable within Belfast. Funding has always been an issue and has never been enough to carry out the measures of the demands within Belfast.</p>	

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		<p>5.41 Mid Ulster District Council has been delivering the Affordable Warmth service within the Mid Ulster District Council area on behalf of the Department since 2014. The nature of the Affordable Warmth service, targeting low-income households who experience the effects of fuel poverty and energy inefficiency, means the impact upon vulnerable Section 75 groups will be profound. The Scheme is the Executive’s main intervention to support people on a low income who rent their home from a private landlord and who are most at risk of fuel poverty and the targeted nature of the scheme aims the support at those areas where levels of fuel poverty are highest.</p> <p>5.42 The Council is concerned that this reduction in NIHE budget will impact on the ability of the Department to meet its Vision as set out in the HSS, and the City’s ambition as set out in the Belfast Agenda (the Community Plan for the City) which focuses on inclusive growth where no one is left behind. Impact on those already in housing crisis and housing stress will be exacerbated given that the investment in housing stock has the potential to address several economic and social problems.</p> <p>5.43 A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived DEAs.</p> <p>Capital and Urban Regeneration – the public consultation on A Bolder Vision and the requirement to provide fully accessible and prioritised investment to Belfast city centre to enable inclusive growth and investment, and to reduce severance to communities and the wider city. The main impacts will be accessibility issues to the city centre, having a limited impact on investment for jobs and inclusive growth, and a continuation of the current severance issues to opportunities within the city centre.</p>	

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		<p>The reduction in the budget available to the NIHE could impact progress in terms of the good work to date under the auspices of Community Planning and the Housing Led Regeneration Group on the mapping and identification of public land for housing regeneration and the NIHE’s ability to be able to further progress sites and placemaking opportunities in terms of feasibility, concepts phases to delivery.</p> <p>Impact on those already in housing crisis and housing stress will be exasperated and wider given that the investment in housing stock has the potential to address several economic and social problems.</p> <p>Affordable Warmth— any reduction to this scheme will have a negative impact on those most vulnerable in society.</p> <p>Private Sector Grants and Major Adaptations— any reduction on service will have a detrimental impact on areas of deprivation which have been identified by NISRA. The impact of these multiple cuts will be worst felt by the people living in these areas and the most vulnerable.</p> <p>5.44 There are currently over 11,000 people on the social housing waiting list in Belfast, which represents over 27% of the Regional Social Housing demand. In March 2021 4.8% of Belfast households were recognised as Full Duty Applicant Homeless. A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived DEAs.</p> <p>5.45 A reduction to the NIHE budget will significantly impact on the Department’s previously agreed Vision on Housing Supply. Undoubtedly the reduction in the budget to the NIHE is going to impact some of the most vulnerable in our society</p>	

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		<p>– those experiencing homelessness and housing stress from some of the most deprived DEA's in our city.</p> <p>5.46 We are concerned that this reduction will impact on the ability of the Department to meet its Vision as set out in the HSS, and the City's ambition as set out in the Belfast Agenda (the Community Plan for the City) which focuses on inclusive growth where no one is left behind. The Belfast Agenda is currently undergoing a statutory refresh, this includes a priority area of Housing Led Regeneration with the focus on increasing housing supply across all tenures, reducing social housing projections by increasing the provision of social homes through the Social Housing Development Programme and increasing the number of people living in the city centre across all tenures.</p> <p>5.47 The reduction in the budget available to the NIHE could impact progress in terms of the good work to date under the auspices of Community Planning and the Housing Led Regeneration Group on the mapping and identification of public land for housing regeneration and the NIHE's ability to be able to further progress sites and placemaking opportunities in terms of feasibility, concepts phases to delivery. This was noted as a key priority in NIHE recent draft Corporate Plan to support Council through mapping exercises to identify housing potential. Any reduction of the NIHE budget will have a detrimental impact on areas of deprivation. Central and Local Government must work together to address the issue of housing stress. 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). This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p> <p>5.48 Affordable Warmth Scheme has been a success in Belfast and provides the whole house approach providing fully funded support to the most vulnerable within Belfast. Funding has always been an issue and has never been enough</p>	

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		<p>to carry out the measures of the demands within Belfast. The Affordable Warmth Scheme prioritises those most vulnerable who are living in substandard conditions. Many of these people live in Areas of Multiple Deprivation. Any reduction to this scheme will have a negative impact on those most vulnerable in society.</p> <p>5.49 Affordable Warmth Funding provides essential grant aided assistance to improve thermal efficiency for private homeowners who are classed as vulnerable people and who may be assessed to be in fuel poverty. Eligible citizens are assisted in keeping warm during the winter months and in making the best use of their limited resources. Reductions in funding or the ability for councils to identify and aid homeowners in completing the eligibility process or funding being redirected to be administered by other bodies, may result in missed opportunities to assist those most in need. Any amendment to the Affordable Warmth Scheme that will rely on citizens self-referring to a third-party body is likely to lessen the impact of targeting the “worst first” across Council areas and may result in vulnerable citizens being disadvantaged.</p> <p>5.50 NILGA is very concerned that councils have been advised that they are responsible for all staffing costs (including severance costs) following the decision to terminate the partnership working with councils on the Affordable Warmth Scheme. Aside from the obvious concerns NILGA has regarding the impacts of this decision on people who need support, NILGA is very concerned that this decision will have unintended consequences which could affect the future willingness of councils to enter into contractual arrangements with departments.</p> <p>5.51 Insufficient social housing stock can have serious implications in domestic violence situations leaving victims (68% of victims are female) trapped in coercive and abusive situations as they have nowhere to go.</p>	

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		<p>Any cuts to help address fuel poverty including to the Affordable Warmth Scheme will have greater adverse impacts for women.</p> <p>5.52 NIHE & Social Housing – In 2022 4,593 applications for Housing in Derry/Londonderry were pending, with 3,380 determined to be in housing stress. A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived DEAs. The provision of high quality, affordable social housing in areas of multiple deprivation is essential if the evidenced issues associated with poverty are to be addressed. This is particularly true in Derry/Londonderry where there is a chronic shortage of affordable, quality social housing. Any reduction in the provision of social housing in Derry/Londonderry will have a detrimental impact on all section 75 groups.</p> <p>5.53 For victims of domestic abuse, lack of access to suitable accommodation is already a barrier to seeking help, and further cuts may therefore contribute to perpetuating cycles of domestic abuse, with long term impacts on victims as well as their families</p> <p>5.54 Reductions to the NIHE budget will lead to longer delays in housing adaptations, reductions in supporting people and increased risk of homelessness all of which disproportionately impact upon disabled people.</p> <p>5.55 The reduced target of new-build social houses from 2000 to 1400 in 2023-24 will disproportionately affect disabled people, especially those who require adaptive housing as the waiting lists for suitable housing for disabled people will increase as the percentage of new accessible houses built will be reduced.</p>	

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	<p>5.56 The proposal to reduce the budget for Adaptations grants will leave disabled people trapped in inaccessible homes.</p> <p>5.57 The proposed budget will also put at risk existing levels of funding for energy efficiency programmes tackling fuel poverty across Northern Ireland. A shortfall of £2m in the Affordable Warmth scheme will curtail this programme and the indicative funding of £148k of the Boiler Replacement scheme effectively closes the scheme to new applicants this year.</p> <p>5.58 The budget outlined in the EQIA does not allow for the high costs for goods and materials, contingency planning for emergency situations and the increase in the number of households seeking asylum in Northern Ireland.</p> <p>5.59 The following data should be considered when reviewing the appropriateness of budget distribution:</p> <ul style="list-style-type: none"> • Analysis of Waiting List and Allocations Management data by key Section 75 groups should be considered as this highlights the differential in waiting times for households on the waiting list and those households who have had a housing allocation. This data highlights a relationship between waiting times and such characteristics as religion, disability (wheelchair standard), and age. • Analysis of homeless households awarded Full Duty Applicant status. • Homeless demand trends in terms of the increasing number of placements, increased requirement for units of temporary accommodation, increased requirement for external accommodation due to supply issues, and investment in prevention measures as a proportion of overall programme expenditure. It is critical to understand 	

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		<p style="text-align: center;">the scale and nature of need among particular groups, e.g. young people leaving care, women fleeing domestic abuse, etc.</p> <p>5.60 The nature of the Affordable Warmth scheme, targeting low-income households who experience the effects of fuel poverty and energy inefficiency, means the impact upon vulnerable Section 75 groups will be profound. The targeted nature of the scheme is aimed at those areas where levels of fuel poverty are highest.</p> <p>5.61 The provision of high quality, affordable social housing in areas of multiple deprivation is essential if the evidenced issues associated with poverty are to be addressed.</p> <p style="padding-left: 40px;">This is particularly true in Derry where there is a chronic shortage of affordable, quality social housing.</p> <p style="padding-left: 40px;">Any reduction in the provision of social housing in Derry will have a detrimental impact on all section 75 groups.</p> <p>5.62 The proposed reduction in new build social housing from 2,000-1,400 units is of huge concern. The target set by the Housing Executive for new build social homes in rural areas has been missed in seven of the past eight years. Any further cut to the new build target will put further pressure on housing costs for Section 75 groups in rural communities and exacerbate poverty and inequality.</p> <p style="padding-left: 40px;">The proposal to consider closing the Affordable Warmth scheme is starkly opposed of the Government’s commitment to developing a fuel poverty strategy. This will impact on older people and disabled people in rural communities. Research has shown that rural areas face specific challenges</p>	

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		<p>which can exacerbate their vulnerability to fuel poverty. Without specific consideration of the breakdown of those likely to be impacted, we feel that the proposed cuts to affordable warmth will be discriminatory towards S75 residents.</p> <p>5.63 Potential inequalities:</p> <ul style="list-style-type: none"> • Race and Ethnic Minority— The Audit of Inequalities identified that lower proportions of Black residents own homes, and there is a higher prevalence of private renting amongst the minority ethnic and migrant communities. Poor housing management, high housing costs, and limited access to social housing leads to discrimination, hostility, and a host of health issues for the minority ethnic and migrant communities. The EQIA must consider how the cuts to Social Housing and the Affordable Warmth Scheme will adversely affect minority ethnic communities in Northern Ireland. • Emergency Housing— We would like further information on the impact of budget cuts to the NI Housing Executive’s ability to provide emergency housing for people escaping abusive situations. 	
6	Languages	6.1 We are also concerned that halting the Disability Strategy could undermine the progress that has been made towards drafting legislation recognising British Sign Language and Irish Sign Language, which we believe could be an important mechanism in improving the life chances of the Deaf community in Northern Ireland. This legislation was referenced in the New Decade New	The Department has not proposed a reduction in funding for languages in the indicative 2023-24 Budget allocations.

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		<p>Approach agreement in January 2020 with a commitment from the Department to introduce a Sign Language Bill.</p> <p>6.2 The British Sign Language (BSL) and Irish Sign Language (ISL) communities have always been classed under disability however these groups are a linguistic minority. There are BSL and ISL users who fit across all Section 75 equality categories as well as disability. BSL and ISL users require access to information and this includes where budget cuts affect them. BSL and ISL users are a minority within a minority and are often overlooked or often as an afterthought after decisions are taken. Protect the Sign Language Partnership Group funding of 200k and Protect the Sign Language Policy team within DfC.</p> <p>6.3 It would be important to take into account the issue of the continued development of the Irish language on a strategic basis when discussing budget decisions. Due to the fragile state of the Irish language in the north, and the lack of services available in the community through Irish, a reduction in support for groups providing Irish language services may have a greater impact on the Irish language sector than in other sectors. As the Department of Communities is responsible for the development of the Irish language at community and societal level, we would strongly encourage DfC to work closely with the DE and the DoH to ensure that the characteristics of the Irish language sector at community level are taken into account when making decisions. An integrated approach between such government departments will ensure that the harm caused by cuts is minimised at community level.</p> <p>6.4 The additional language barriers faced by deaf people in particular not only make services more inaccessible, but have also created barriers of perception and confidence, due to lack of understanding and awareness. As a result, individuals with sensory impairment, particularly those who are sign language users are often reluctant to engage with both statutory agencies and arms'</p>	

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		<p>length bodies or uncertain how to access these services in a way which enables them to feel in control and empowered. The impact of voluntary and charitable organisations in helping to address these barriers and to bridge the gap is immense.</p> <p>6.5 DfC to consider keeping the Sign Language Partnership Group (SLPG) funding as without the funding this would create an adverse impact on the women’s group. If there is no funding from SLPG the government and DfC’s objectives & priorities cannot be achieved and there will be no scope for learning opportunities, social development, or interaction for Deaf women. SLPG funding has allowed the DWGNI to deliver Deaf Awareness to all Women’s Aid throughout Northern Ireland. If this funding ceases, there is the possibility that the women will then remain at home still suffering from Domestic Violence and further budgets will need to be used for services they use i.e. counselling, GP’s, hospitals etc.</p> <p>6.6 The deaf community, with two signed languages (NI-BSL & ISL), is a vulnerable group. With limited access to public information in English and a severe shortage of good interpreters in Northern Ireland, NI Deaf Interpreters & Translators Association (NIDITA) provide a vital regular information service for the deaf community to ensure they’re informed and prepared, which was particularly important for their health and well-being during the pandemic. Cutting funding to support deaf interpreters will leave the deaf community will be isolated and frustrated.</p> <p>It is important for the deaf community to be seen as a vulnerable Section 75 group because of spoken language inaccessibilities (even for deaf people with cochlear implants, it is still inaccessible). Funding for accessible information in our two signed languages should be ring-fenced and protected as part of the Northern Ireland Assembly’s duty and responsibility to preserve,</p>	

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		<p>protect and promote the deaf community and our two languages. Having deaf interpreters involved will create a more equal society in Northern Ireland for the deaf community and allow them their independence and the ability to be culturally deaf instead of being forced to act & think ““hearing”” when using hearing interpreters which is quite harmful for the deaf community well-being and dynamics.</p> <p>Working towards new legislation for recognizing sign language requires funding which will create a better more equal society. If there is no support, we will undo all the hard work and progress we have made to date. Through providing free accredited sign language classes for families, we are reducing stigma and discrimination, thus also improving the mental, emotional well-being of deaf children.</p>	
7	Rates Support Grant	<p>7.1 The Rates Support Grant was reduced by £3m in 2022- 23, and a further reduction of £4m has been proposed for 2023-24. The Department should commit to monitoring and publicising the consequences (intended and unintended) of the reduction to the rates support grant for councils.</p> <p>7.2 The reduction in Rates Support Grant (RSG) will impact on the ability of the Council to provide its ratepayers with essential services. The proposed cuts would negatively impact the Council’s ability to delivery frontline services, which the Department are urged to reconsider. Having to compete with better of councils for a share of the grant puts residents at a socio-economic disadvantage. DfC is making assumptions regarding how the RSG is spent within Council on the basis that the Council’s budget is entirely fungible. However, the notice of the reduction in the RSG comes after the Council has already made budget cuts, and importantly, after the rates are struck by the Council. The DfC cannot state that the reduction will not have a negative impact on the Section 75 groups, as the Council will now need to find further cuts to services, which will automatically impact on all Section 75 groups. The</p>	<p>The Department has carried out a separate screening exercise on the Rates Support Grant. In addition, a review of the Rates Support Grant will be taken forward by the Department in 2023-24.</p>

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		<p>Council cannot ‘renegotiate’ the rates raised from the residents and businesses of the district to compensate for the reduction in the RSG, due to the timing of striking the rates, and the budget position announced by the DfC.</p> <p>7.3 This EQIA is being developed in the context of a £3m reduction having already been introduced of the Rates Support Grant in the 2022/23 financial year a further reduction to £4.9m is unworkable. While the Council is aware of the possibility of additional monies being released, from the current proposals is it clear that a major source of income that allows Council to set a rate that is reasonable for all its citizens is in jeopardy. If this rate support is further reduced as is proposed, this further cut this will have serious implications for service delivery planned for the financial year. It would result in Council not being able to deliver its planned services and this would have a negative impact across all areas of Section 75. The scale of this proposed reduction in the RSG will make the delivery of statutory provision within Council services extremely difficult. The impact of a vast reduction of a scheme which was established to support more financially constrained councils, protecting rate payers from unfair rates hikes; cannot be underestimated in relation to the overall impact rate payers across the Section 75 groupings.</p> <p>7.4 The Department needs to establish a formula for calculating RSG, thus providing Council greater certainty on its future budget and allowing councils to have greater revenue raising powers.</p> <p>7.5 Likely to impact council areas with lower rates bases (who currently benefit). This will have a clear urban-rural differential impact – and should require a rural proofing.</p>	

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		<p>7.6 Concern over cuts to the Rates Support Grant, which was established to support more financially constrained councils, protecting rate payers from unfair rates hikes.</p> <p>This could have a knock-on effect on the VCSE sector as Councils then reduce their external grants due to budget pressures. If Council grants are reduced, they will most likely effect youth groups, disability groups and local women’s groups as well as ethnic minority support.</p> <p>7.7 Rates Support Grant was devised to assist the least wealthy and most deprived and rural Councils provide equality of service provision with the more wealthy Councils. 7 Councils impacted by the cuts and 4 Councils not impacted. Derry City and Strabane District Council is the most significantly impacted. Rates Support Grant funding is a critical component of the baseline funding of each of the 7 impacted Councils. Accordingly, any cuts will result in significant service reductions, excessive rates increases and likely redundancies in these Council areas. All Councils have already had to scale back services in response to inflationary and global cost of living pressures so any further cuts will have very severe impact. These cuts will fall across a range of services but given the correlation between low income/deprivation and S75 groups and inequality it will fall hardest on the poorest within these areas. Firstly, the cuts will clearly have a disproportionate on the Catholic population. Impact analysis from the Census 2021 illustrates that the Catholic population within the 7 impacted Councils is 51%. This compares to Catholic populations of 27% in those Councils who are not entitled to Rates Support Grant and 42% across Northern Ireland as a whole. Furthermore, of the 805,151 Catholics across Northern Ireland, 559,563 (69.5%) live in Council areas impacted by Rates Support Grant cuts.</p>	

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		<p>7.8 Rates Support Grant reductions will see ratepayers in less wealthy and more deprived and rural Council areas continue to pay higher and higher rates poundage's as a proportion of their property values compared to those in more wealthy Council areas. This is not a fair outcome of the NI rating system.</p> <p>7.9 Rates Support Grant funding is a critical component of the baseline funding of each of the 7 impacted Councils. Accordingly, any cuts will result in significant service reductions, excessive rates increases and likely redundancies in these Council areas. All Councils have already had to scale back services in response to inflationary and global cost of living pressures so any further cuts will have very severe impact. As one of the main councils to receive RSG, Newry, Mourne and Down District Council is severely impacted.</p> <p>7.10 DFC financial contributions to district councils, although supplemented by income from district Rates, are critical. The various amounts make a massive difference to the public and it is undoubtedly the case that material reductions in these amounts will produce significant negative impacts on the groups protected by Section 75. The DFC must have due cognisance for the consequences of the proposed funding reductions 2 and it would be unacceptable for the DFC to simply let the problem 'flow downstream'; to do so would be unacceptable and morally unconscionable.</p> <p>7.11 With regards the overall budget and in particular from a Council perspective specifically Rates Support Grant(RSG) data on the Religious make-up of the Councils who receive RSG has not been included, this data will show that the Councils in receipt of RSG represent proportionately more people from a Catholic background than those not in receipt of RSG. Additionally, data on the age of the population should have been included, Causeway Coast and Glens Borough Council has a significantly higher</p>	

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		<p>proportion of its population in each of the over 50, over 60 and over 70 categories than those of the 4 Councils who do not receive RSG.</p> <p>7.12 People in our disadvantaged communities are heavily reliant on the services of advice agencies. Our understanding is that the work of these agencies is made possible through grants from Belfast City Council, who in turn fund this from monies they get through the Rate Support Grant. Reductions in welfare advice services will impact disproportionately on those who have to regularly use the benefits system, such as disabled people, older people and those with dependants and in particular women.</p> <p>7.13 NILGA note that the Rates Support Grant has proved persistently vulnerable to attempted cuts, as it is not protected in legislation. The grant has been eroded by 75%, from £20.5m in 2008/09 to £4.9m in 2023/24, and NILGA is certain that the impact of this latest proposed cut, without a policy intervention, will mean that ratepayers in these areas pay a significantly higher percentage of their property values in rates than better off councils, notwithstanding a period of increased investment in the Rates Support Grant for these councils during 20/21 and 21/22 by the then DfC Minister. They are deeply concerned that the repercussions of the cut will fall on groups already struggling to cope with the cost-of-living crisis. NILGA would be keen to see a policy discussion commence in relation to making the Rates Support Grant statutory, potentially on a hypothecated basis.</p> <p>7.14 We note that the EQIA states there will be no adverse impact as a result of the decision to cut the Rates Support Grant by £4 million in 2023-24, following a £3 million reduction in 2022-23, down from £20.5 million in 2008. This policy was originally put in place to support the most deprived council areas to provide services on par with wealthier councils. The proposed reduction has potential to adversely impact on older homeowners in rural areas, older</p>	

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		<p>people with a disability and those living on low incomes; and also on the wider ageing population due to an inevitable reduction in council services as a consequence of reduced revenue stream. We seek further information about how the Department arrived at this decision and recommend that a full Rural Needs Impact Assessment be conducted.</p>	
8	Social Security Benefit Delivery	<p>8.1 Any reduction in support to people in receipt of welfare benefits will impact on those in most need across our communities, in particular those that reside in Areas of Multiple Deprivation (as defined by NISRA). The Department has a statutory responsibility to deliver benefits, and therefore this should be a priority and not a service area placed at risk.</p> <p>8.2 The Department needs to ensure that the appropriate IT infrastructure is in place to support benefit payments to the most vulnerable in our society. Consideration should be given to office estate requirements to ensure this support both customers and staff requirements.</p> <p>8.3 Failure to secure the funding necessary to appropriately resource benefit delivery (which will lead to delays in benefit payments and place working age claimants in financial hardship) is a cause for concern. It creates a risk of services to those most vulnerable people reliant upon social security in Northern Ireland. It is unacceptable that these people should experience greater delays in the administration of their benefits (especially during a cost-of-living crisis). Social security claimants need to be able to rely on the safe, timely delivery of existing social security services. While the Department aims to progress “Move to U” within its existing staff complement, it will put at risk delivery of the programme (and by extension people affected by the programme). Social security claimants affected by ‘Move to UC’ need to be</p>	<p>The Department bid for the funding required in 2023-24 to recruit the additional staff required to deliver an increasing Universal Credit caseload; implement the Move to Universal Credit for tax credits and legacy customers; address increasing level of fraud in the welfare system and the IT infrastructure required to support benefit and pensions delivery.</p> <p>Given the constrained financial position at NICS level, the Department bids were not met. To mitigate the risk to benefits and pension service delivery (including the Move to Universal Credit), the Department aims to sustain services and implement the Move to Universal Credit within its existing staff complement. This position is not without significant</p>

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		<p>reassured that additional resources are in place help with the challenges and safeguard the well-being of vulnerable people.</p> <p>8.4 Closure of Departmental Offices 1 day a week could lead towards a risk of further frontline JBO closures and by extension longer travel distances for claimants needing to use JBO's. The Department should commit to ruling out any JBO closures.</p> <p>8.5 The proposed cuts to Social Security Delivery will have detrimental impact on people with disabilities, who are already experiencing high cost of living. Any delays or break in social security benefits will put disabled people at risk and cause stress and anxiety. The Department has a statutory responsibility to deliver benefits, and this should be a priority and not an area at risk.</p> <p>8.6 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Any reduction in support to vulnerable families will have a detrimental effect.</p> <p>8.7 This cut will impact those groups disproportionately dependent on UC, social security benefit and sickness & disability payments. Likely that impact will be greatest in rural areas where pressures will be greatest.</p> <p>8.8 Cuts in the recruitment for the staff needed to process benefits will impact more greatly on those with dependants who were often already facing delays in having claims processed. With 49% of 0-19 yrs. in poverty in Inner East payment delays will affect those with dependents disproportionately.</p>	<p>risk and will greatly exacerbate the pressure already being felt in operational benefit delivery areas, with potential impact on service delivery.</p> <p>The Department will closely monitor benefit and pension service delivery performance and clearance times during the year. Where possible, action will be taken to mitigate any impacts on benefits and pension service delivery.</p> <p>The Department acknowledges that its reduced 2023-24 Budget could have impacts across all Section 75 groups.</p>

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		<p>8.9 Welfare reforms will disproportionately impact individuals with a sensory loss due to challenges around employability and increased costs of living with a disability. It is therefore essential that frontline staff, assessing and supporting with welfare changes are accessible and have the knowledge and skills to appropriately understand and meet the needs of individuals with a sensory loss, which can often be more time intensive.</p> <p>8.10 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Advice services and those working with vulnerable families all say that as we recover from covid, people on benefit support are struggling even more. Any reduction in support to that section of the community will have a detrimental effect on already struggling families.</p> <p>8.11 Any reduction in support to people on benefits will impact on those in most need. In the aftermath of the pandemic and in the middle of the cost of living crisis there should be no reduction in service. In fact, there should be increased support provided. Delays in appeals: With reduced funding, the tribunal service may face staffing shortages and increased caseloads, leading to longer waiting times for appeal hearings. Negative impact on well-being and quality of life: Personal Independence Payments (PIP) are designed to help individuals with disabilities or long-term health conditions maintain their independence and improve their quality of life. When funding cuts lead to delays or denial of these payments, individuals may struggle to access necessary support, leading to increased financial hardship and a decline in overall well-being.</p> <p>8.12 Universal Credit, Move to Universal Credit, Health Assessments -The proposal to deliver increased demand and new systems within existing staff compliment will cause adverse impact and financial hardship to older people</p>	

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		<p>who are still of working age and other groups. We note that the EQIA states that “Will lead to delays in benefit payments and place working age customers in financial hardship and put at risk delivery of the Move to Universal Credit programme...slippage of lower priority [non-statutory] areas, such as debt referrals...” (P18). We note that no specific mitigations have been suggested.</p> <p>8.13 The protracted bureaucratic process used in PIP assessments is cost intensive and while many of the original decisions were overturned for those who had the energy to pursue it, it resulted in “the most disadvantaged people” being even more disadvantaged. This protracted system continues to apply to children with disabilities, who appear to be doubly disadvantaged as parents have to engage with both the PIP/DLA systems as well as the Education system, which is painfully underequipped for children with special needs.</p> <p>8.14 The Department notes that the need to prioritise new benefit claims to deliver its statutory obligations will lead to slippage in “lower priority areas”, including debt referrals, and increase the overall debt stock, which will “put at risk the Department’s ability to safeguard public funds”. We would welcome more information on the specific risks to public funds, and the potential impacts to section 75 groups should safeguarding of these funds fail. We note that there is a general lack of engagement on the gendered impacts of this budget. It is identified that men and women will be adversely impacted by lack of funding to provide employment support. However, women tend to face more frequent and unique barriers to full economic participation in the labour market than men, including unpaid caring responsibilities, a lack of affordable childcare, the gender pay gap and sex discrimination. It is also true that people of all genders will be impacted by constrained funding available for social security benefit delivery and the move to Universal Credit, as well as the inability to take forward new welfare mitigations.</p>	

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		<p>8.15 As an organisation providing benefit advice to local people, we believe that failure to properly resource the delivery of UC in Northern Ireland would have a significant impact on a wide range of groups, who are either dependent on benefits for their household income, or who use the support provided by UC to access childcare. Many of our clients – who range from older working age adults living alone, to families with children, to people with disabilities – are entirely reliant on benefits for their household income, and many, in our experience, manage their household finances in a precarious way, from payment to payment rather than as an income, which increases the potential destabilising impact on households of delays in payments. We believe that it is essential that resources are made available to properly manage the delivery of Universal Credit; the loss of income resulting from the failure to migrate these claimants would have a significant impact across a wide range of groups. We believe that it is vital that the Department has the necessary resources to administer the social security system without impacting on the service provided to individuals and families who may be entirely reliant on benefits for their household income, and who have limited or no recourse to other financial or non-financial support to negotiate any delay.</p> <p>8.16 We oppose the proposal to close Departmental offices one day per week, which, as the consultation document correctly notes, would have a significant adverse impact on people with a disability and older people who are more likely to require face-to-face support on issues related to social security and pensions. We expect that if this proposal were to be progressed, a separate and comprehensive equality impact assessment will be carried out and adequate alternative policies or mitigations identified.</p> <p>8.17 The EQIA states that 'further work to assess the impact of office closures is being progressed, particularly given the Department's responsibilities for</p>	

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		<p>delivery of benefits and pensions to vulnerable people, including people with a disability and older people who may require more face-to-face support.’ (p19) Age NI agrees that this proposal will cause adverse impact to older people, particularly given the complexities of the system, digital exclusion, fear of scams etc. The 2022 Independent Review of Discretionary Support, commissioned by the former Minister for Communities, found that, “the online and telephone systems were also seen to create vulnerabilities for older people, particularly those anxious about sharing financial details, both as a matter of privacy and as a concern around scams. While phone applications allowed claimants to speak to someone, face to face systems were seen to be more helpful for older people.” We look forward to the Department publishing further information, including mitigations.</p> <p>8.18 Whilst not directly impacting on our primary delivery we recognise that any reduction in front line social security offices will have an impact on the primary beneficiaries of these services, who by the nature of the service provided are already disadvantaged through poverty.</p> <p>8.19 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Advice services and those working with vulnerable families all say that as we recover from covid, people on benefit support are struggling even more. Any reduction in support to that section of the community will have a detrimental effect on already struggling families.</p> <p>Belfast Tribunal Service— funding for this service needs to be mainstreamed and ring fenced. Funding cuts to such a service can have several negative impacts:</p>	

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		<p>Delays in appeals: With reduced funding, the tribunal service may face staffing shortages and increased caseloads, leading to longer waiting times for appeal hearings. This delay can cause significant distress and financial hardship for individuals who rely on PIP to meet their daily needs.</p> <p>Increased stress and anxiety: People awaiting appeal often experience high levels of stress and anxiety due to the uncertainty surrounding their financial situation. Funding cuts may exacerbate this stress, as individuals have to wait longer for a resolution to their appeal, prolonging the period of financial insecurity and emotional strain.</p> <p>Limited access to legal representation: Funding cuts may result in reduced availability of legal aid or support services for those navigating the appeal process. This can disproportionately impact vulnerable individuals who may struggle to understand complex legal procedures or represent themselves effectively. Without proper legal support, their chances of a successful appeal may be diminished.</p> <p>Negative impact on well-being and quality of life: Personal Independence Payments— funding cuts lead to delays or denial of these payments, individuals may struggle to access necessary support, leading to increased financial hardship and a decline in overall well-being.</p> <p>Increased strain on other services: If the Belfast Tribunal Service faces funding cuts, the burden of handling appeals may shift to other government agencies or services. This can result in increased pressure on alternative dispute resolution mechanisms, leading to delays and backlogs in those systems as well.</p>	

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		<p>8.20 Significant concerns raised on the impact of funding challenges on the administration of Universal Credit. There is a need to protect people most at risk of disadvantage across the Section 75 groups from the adverse impact of welfare reform.</p> <p>8.21 Universal Credit— it is simply unconscionable to accept that the initial wait would be lengthened in any way as a result of staff shortages within the Department to process and pay Universal Credit. This will have significant impacts for Universal Credit claimants as even very small delays in accessing support can leave households in financial distress.</p> <p>8.22 The consultation document suggests closing departmental offices one day per week but notes concerns about the impact on frontline customer service delivery especially for those who are the most vulnerable who require face to face support. The document rightly notes that this may impact on people with a disability and older people. We suggest that this will adversely affect people who are suffering from mental health problems who are more likely to need intensive and face to face support.</p> <p>8.23 Some of the likely consequences of the Department’s budget allocation highlighted in the consultation document could have severe impacts on new UC claimants as well as the process of managed migration.</p> <p>8.24 From UC research which was drawn from the early cohort of UC claimants in Northern Ireland, in many cases, their wait for a first payment was much longer than the intended five weeks. If the Department is unable to fill the stated vacancies in the ‘Move to UC’ team, then the expectation must be that longer waits will become more common again for new claimants.</p>	

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		<p>8.25 The risk of understaffing also increases the potential for operational delivery problems in the managed migration process. The direct risk to claimants if staffing levels are unable to support their managed migration, is that they would fail to migrate successfully within the deadline and lose out on any transitional protection as a result. Recruitment to the UC and Move to UC teams would also be very desirable to reduce the risk of increased hardship arising for new or migrated UC claimants which the DS fund would ultimately have to deal with.</p> <p>8.26 An impact on the primary beneficiaries of these services, who by the nature of the service provided are already disadvantaged through poverty. This in turn will add additional pressure on Advice Services which are currently under extreme strain.</p> <p>8.27 Health assessments are vital to ensuring that those most vulnerable within society, particularly those with disabilities, health conditions and older people are effectively supported. It is important that any budgetary cuts do not adversely impact on this service including diminishing service levels, increasing backlogs, waiting times and the possibility of benefits not being received by some of the most vulnerable in our society.</p> <p>8.28 While, at present, relatively few people who Mencap support are on Universal Credit, there is a clear direction of travel that more people will migrate to this benefit— and the associated mandation of visits to JBO's – in the coming years. It is, therefore, deeply concerning that DfC are proposing to reduce supports to individuals at a time when there is a need for increased local supports and information to people with a learning disability migrating to UC.</p>	

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		<p>8.29 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Advice services and those working with vulnerable families all say that as we recover from covid, people on benefit support are struggling even more. Any reduction in support to that section of the community will have a detrimental effect on already struggling families.</p> <p>8.30 This Council robustly opposes cuts which would lead to increased processing time for those making applications to Universal Credit. This will have a negative impact on the emotional and physical health of constituents and plunge many more children in the Borough into poverty. This Council requests that resources remain in place to process claims below the current times as the withdrawal of funding will negatively impact the most vulnerable in this Borough and be unacceptable to this Council.</p> <p>8.31 At no point does the EQIA identify that children are more likely to be impacted by potential cuts to social security provision as they are more likely to live in poverty.</p> <p>8.32 Whilst not directly impacting on our primary delivery we recognise that any reduction in front line social security offices will have an impact on the primary beneficiaries of these services, who by the nature of the service provided are already disadvantaged through poverty. This in turn will add additional pressure on Advice Services which are currently under extreme strain.</p> <p>8.33 Recruitment for staff for frontline administration of benefits should be prioritised internally within the Department to meet support need.</p> <p>8.34 Cuts to social security delivery will disproportionately impact upon disabled people.</p>	

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	Theme	Summary Comment / Points Raised	Response
		<p>8.35 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Advice services and those working with vulnerable families all say that as we recover from covid, people on benefit support are struggling even more. Any reduction in support to that section of the community will have a detrimental effect on already struggling families.</p> <p>8.36 Any reduction in support to people on benefits will impact on those in most need. In the aftermath of the pandemic and in the middle of the cost of living crisis there should be no reduction in service. In fact, there should be increased support provided.</p> <p>8.37 Close Departmental Offices 1 day a week – This proposal states that it will realise savings in cleaning, security and energy. This will impact on the wages of cleaning and security staff. The average wage for a cleaner in Northern Ireland is 11:00 (Indeed) 58 p more than the minimum wage. This could have a very negative impact on the health and well-being and standard of living on the people affected by this proposal.</p> <p>8.38 Whilst not directly impacting on our primary delivery we recognise that any reduction in front line social security offices will have an impact on the primary beneficiaries of these services, who by the nature of the service provided are already disadvantaged through poverty. This in turn will add additional pressure on Advice Services which are currently under extreme strain.</p> <p>8.39 The NIHRC is concerned by the failure to secure the funding necessary to appropriately resource the delivery of benefits and pensions. The Department advise that key areas of risk include: the ability to deliver the increasing Universal Credit caseload, the Move to Universal Credit for tax credits and</p>	

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		<p>legacy customers, addressing increasing level of fraud in the welfare system and the IT infrastructure required to support delivery. Rather than redressing or mitigating the delay in benefit payment that is driving people further into debt, the budget 2023-24 is likely to exacerbate its impact. They are also cautious about the consideration being given to reduce the overall size of the Departmental estate. While the cost-saving benefit of closing Departmental offices one day a week is acknowledged, the potential impact on front line customer service delivery needs to be carefully evaluated. Particular attention should be paid to persons with disabilities, migrants, older persons and persons living in remote areas who may require more face-to-face support and assistance. Local access to Jobs and Benefits offices should be protected to ensure such individuals do not have to travel further distances. The NIHRC recommends that the Department for Communities prioritise taking effective steps to ensure that social security is adequate, accessible and promptly available across NI, and the maximum available resources are used to guarantee an adequate standard of living to all recipients.</p> <p>8.40 An additional concern is the identified mitigation for resourcing challenges in delivering the move to Universal Credit (UC). If the 55,000 tax credit claimants in NI have not been migrated to UC by 5th April 2025, they will lose access to welfare support. We note that the Department “will aim to progress” the move to UC by using its existing staff complement, while acknowledging that this will “greatly exacerbate” existing pressures felt in operational benefit delivery areas and adversely impact on service delivery. Given the pressures identified, it is difficult to see how the move to UC can be successfully managed using the existing staff complement. The scale of these difficulties is stressed in the consultation document, but no specific mitigation plans have been identified. We appreciate that the Department is facing some extremely difficult financial and operational decisions. However, it is simply unacceptable to risk leaving at least 55,000 recipients of legacy social security benefits</p>	

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		<p>without access to any welfare support. It is noted that the Department has no funding to replace IT devices over 3 years old, posing a considerable risk to social security operational benefit delivery. Again, this is another unacceptable risk to the most vulnerable in our society, with potentially wide-reaching and significant adverse impacts. However, no mitigating measures have been identified in this consultation document.</p> <p>8.41 Women in rural communities take three times longer to escape from Domestic Abuse than women in urban communities. This needs to be taken into consideration if DfC seeks to reduce funding to community and voluntary organisations supporting victims of domestic violence.</p> <p>If the Department seeks to close JBOs one day a week as a cost saving measure, we suggest that it ensures Mondays and Fridays are protected from such closures. Claimants in distress and seeking payments who need to see JBO staff face to face in a crisis should not need to wait an additional day over a long weekend if Fridays or Mondays are used as closure days. Then closure of JBO one day per week is likely to be exacerbated by the reduction in funding for public transport and community transport proposed by the Department for Infrastructure.</p> <p>8.42 Social Security Cuts— Will have negative impact on people with disabilities, who are already experiencing high cost of living. Any delays or break in social security benefits will put disabled people at risk and cause stress and anxiety. The Department has a statutory responsibility to deliver benefits and this should be a priority and not an area at risk. Cuts to front-line service delivery and the migration of legacy benefits to UC requires 300 additional staff which will not be recruited. This will put additional pressure on staff to fulfil the Departments statutory duty to process claims and make payments. The migration from legacy benefits to UC is already causing</p>	

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		<p>anxiety for claimants with the 5 week waiting period – any delays will cause more stress for claimants.</p> <p>8.43 DfC, being responsible for the delivery of the social security system, including child maintenance and pensions, has failed to consider the impact on people with No Recourse to public funds. These individuals, often from minority communities, face significant challenges in accessing essential services and support. Statutory authorities have a legal obligation to safeguard the welfare of children, including those without access to mainstream benefits. The Children (Northern Ireland) Order 1995 (Section 18) provides legal provisions for support to families subject to NRPF when the child is assessed.</p> <p>8.44 Early Years is exceptionally concerned that many of the proposals related to our social security safety net will serve to deepen the level of poverty experienced by many children in Northern Ireland, while also pushing more into poverty. DfC and Joseph Rowntree’s analysis on poverty rates in Northern Ireland have consistently shown that more children live in poverty than other population groups. This is unacceptable and non-sensical, the early years shape future outcomes and investment and this time reduces financial expenditure later. As lead department for tackling poverty and disadvantage and with responsibility for the child poverty strategy it is disappointing not to see reference to these responsibilities or analysis of the impact on these policies within the EQIA.</p>	
9	Social Strategies	9.1 The EQIA states that the Department have decided that there will no funding for the suite of Social Inclusion Strategies committed to under New Decade New Approach. NICVA are concerned that there has been no prior consultation on this decision, given that EQIA’s should inform decision-making and be carried out before key policy decisions are taken.	Work has been undertaken on draft Social Inclusion Strategies for consideration by an incoming Minister and Executive. The absence of both Ministers and an

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		<p>NICVA has consistently articulated that the provision of support to those who are socially excluded and most marginalised remains a major area of public policy responsibility for Northern Ireland government departments that deserves to be led by strategy, rather than funding and we cannot therefore afford to lose momentum. These strategies are essential for planning for the future in prioritising and implementing key policy decisions to reduce/address inequalities and we strongly recommend that progress against their delivery and implementation is maintained.</p> <p>9.2 The Department should continue to progress the social inclusion strategies, to support people in Section 75 groups.</p> <p>9.3 The Department’s proposal to indefinitely pause the work on both the Disability Strategy and the Disability Employment strategy risks a loss of momentum on what are already long overdue key strategy areas. Each of these strategies have, to date, had considerable resource assigned and progressed with a co-design approach with disabled people; halting these is likely to communicate a message of de-prioritisation of the input of disabled communities. The strategies are also key in underpinning future disability policy work, and we would urge the Department to reconsider proposals to pause these completely. As outlined in the Disability Strategy’s expert panel draft report and recommendations; “The Disability Strategy, and all laws and policies which underpin it and flow from it, can act as a gold standard to demonstrate how meaningful participation of d/Deaf and disabled people can be achieved in design, implementation and monitoring.” Proceeding with the proposed cuts outlined will effectively mean that the Department loses the opportunities to maximise the cross-departmental approach toward disability and maximise the benefits of existing programmes.</p>	<p>Executive since the end of 2022 has meant that work to update the Strategies has been unavoidably constrained and, even if this work could be progressed, final content of each, including the resources required for delivery, will require Executive approval.</p>

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		<p>The delay of the Disability Strategies would have significant impacts on disabled people in areas of equality, employment and accessibility and inclusion in society.</p> <p>9.4 Policy needs to be distributed to address the imbalance between women and men as women are more likely to be lower paid, providing care to others, in receipt of social security benefits and victims of domestic violence.</p> <p>9.5 The DfC social inclusion strategies provide an example of a cross departmental process that would have assisted this process, but our understanding is that they have been halted as part of the budget crisis.</p> <p>9.6 Although they were not mentioned in the EQIA, these strategies are vital in addressing disadvantage and promoting social inclusion, particularly for children and their families. However, without a budget to develop and/or deliver new actions, their impact will be severely limited and have an adverse effect on children, young people and families.</p> <p>9.7 No funding to Executive and New Decade New Approach commitments, including Social Inclusion strategies and associated legislation – the suite of Social Inclusion Strategies is an attempt to address poverty and inequality in a range of areas and it is extremely concerning that no funding has been allocated to these despite being committed to in the New Decade New Approach Agreement. It was clear from each of the Expert Panel Reports on the Social Inclusion Strategies the urgent need to address existing inequalities and therefore a lack of funding to progress these will have adverse impacts across all the Section 75 groups.</p> <p>9.8 We would advocate immediate action to take a cross-departmental comprehensive approach which examines the cumulative and overarching</p>	

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	<p>effects of cuts from all the departments. The DfC social inclusion strategies provide an example of a cross departmental process that would have assisted this process, but our understanding is that they have been halted as part of the budget crisis.</p> <p>9.9 We need new government strategies for poverty and disability and old age yet they are all stopped as there is no money - this will mean no work will be done to improve services in these areas.</p> <p>9.10 Potential inequalities:</p> <ul style="list-style-type: none"> • Gender identity and sexual orientation - A report from the Brunel Centre for Sport, Health, and Wellbeing highlighted that there are barriers to participating in sports for LGBTQIA+ people. The cuts to the Arts and Culture sector proposed in the 2023-24 Budget will have an adverse impact on the LGBTQIA+ community. <p>9.11 We note that the Department outlines that the 2022-23 Budget included “no funding to ...Social Inclusion strategies and associated legislation.” The EQIA, however, makes no reference to these important social inclusion strategies in the context of its 2023-24 Resource. We also note with concern the ECNI response to the EQIA which states, “consideration is being given to pausing work on the various social inclusion strategies, with relevant DfC staff being temporarily redeployed.” Age NI is concerned at the lack of funding allocated to progressing key strategies including the Active Ageing Strategy, Anti-poverty Strategy, Social Inclusion Strategies and Age Friendly initiatives. Age NI seeks urgent clarification on this matter. If work is to be paused on already overdue social inclusion strategies, including Active Ageing Strategy, then it is essential that the impacts are fully considered for the Section 75 categories. Age NI request detailed information which the Department used in</p>	

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		<p>its assessment that no inequalities were identified for LGBTQI+ people, those with different marital status and political opinion.</p> <p>9.12 DfC has a crucial role in encouraging diversity, promoting participation in society, and fostering social inclusion. The Equality Impact Assessment does not adequately address the impact on people from different racial backgrounds. It is essential for the department to move beyond superficial understanding of ‘Diversity’ and instead examines the structural impact of inequalities on minoritised groups including structural racism.</p> <p>9.13 The assessment overlooks the impact of racism in Northern Ireland, which is a significant concern affecting minority communities. Despite race hate crimes surpassing sectarian hate crimes since 2016, the assessment does not acknowledge this reality. The Department of Communities must recognize the prevalence of racism and consider its impact in the equality assessment. This includes ensuring the protection of resources to support anti-racism initiatives.</p> <p>9.14 DfC has traditionally focused on addressing sectarianism, but there is little acknowledgement of the impacts of racism or the specific needs of minority communities. This oversight perpetuates systemic inequalities and hinders progress toward a more inclusive society. It is crucial for the department to expand its understanding and response to include racism as a priority, ensuring that resources and support are available to address the challenges faced by minority communities.</p> <p>9.15 Young males are likely to be significantly and adversely impacted by the cuts in the current Department for Communities budget. Young males are more likely to be drawn into anti-social behaviour, ‘arranged fights’, and ‘recreational rioting’ at interfaces. These are the young people who already have been failed by the education system. They have limited life choices and</p>	

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		<p>participation in anti-social behaviour and conflict at interfaces may draw them further into the criminal justice system leading to criminal records and involvement in crime.</p>	
10	Staff Vacancies	<p>10.1 Given the level of vacancies facing the Department, measures need to be in place to ensure available staff resources are used in the most effective way.</p> <p>The Department and wider NICS also needs to ensure a meaning pay award is provided to staff, to ensure public sector pay maintains pace with private sector pay and does not impact of the Department's ability to recruit staff.</p>	<p>The Department has robust complement methodologies in place to determine the staff numbers required to maintain service delivery. Whilst the Department's 2023-24 Budget is constrained, the Department continues to prioritise its available resources to best support service delivery.</p> <p>The Department recognises the significant contribution staff have made throughout the Covid-19 pandemic and continue to make during the current Cost of Living crisis. Whilst the Department is supportive of a meaningful pay award for staff, this will be subject to overall affordability at an NICS level.</p>

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11	Supporting People	<p>11.1 In 2020 a report completed by the Supporting People programme as the policy and funding framework for housing support services, identified significant shortfall in supply of support for a range of groups. Those shortfalls will only now be further exacerbated by the budget cuts.</p> <p>11.2 Cause for concern that no funding allocated towards a Supporting People provider uplift. A reduction in funding to the Supporting People Programme (again further information is required to assess the impact in terms of the scale of the reduction and the services that may be affected).</p> <p>11.3 Funding cuts to the Supporting People programme will have a detrimental impact on many S75 groups. It should also be noted that a number of Council staff are directly employed to assist in administering the scheme on behalf of DfC/NIHE. Should the funding cease or be further reduced then these posts will certainly be at risk.</p> <p>11.4 The Supporting People programme, delivered through the NIHE, is critical in supporting the most vulnerable citizens in communities across NI. Any reduction in the current level of funding to Supporting People will have far reaching impact across NI, including the likelihood of destabilising the community and voluntary sector which provides numerous invaluable services through this funding stream. Further cuts from this programme will be unsustainable as any efficiencies and streamlining have already been achieved and providers, such as Praxis Care, will be left making difficult decisions about service reductions and closures. In summary, jobs and vital services will be lost. Through the Supporting People programme 43 services to approximately 563 individuals who fall within Section 75 category groups are delivered. These services provide vital support services that achieve positive outcomes through the delivery of housing support to some of the most marginalised and vulnerable people within Northern Ireland. These</p>	<p>The Department values the outcomes delivered through the NI Housing Executive's Supporting People Programme and providers, and recognises the vital contribution of the providers during the Covid-19 pandemic and now Cost of Living crisis.</p> <p>The Department and the NI Housing Executive acknowledge the adverse impact the proposed funding cut would have on vulnerable people and across Section 75 groups. Since the Department's EQIA launched, there has been extensive engagement ongoing to consider other funding options and mitigate any impact to the Supporting People Programme in 2023-24.</p> <p>The Department bid for funding to support Supporting People Programme and its providers in 2023-24. This included bids for increased demand, inflationary pressures, and uplifts for pay. Despite these bids, the</p>

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		<p>include mental health, learning disabilities, older people, dementia and young peoples services. Any reduction to the SP programme will expose marginalised groups by widening parity issues further as services will be forced to cherry pick referrals based on funding levels, or close services, leaving those with complex needs without SP services. It is worth noting that a large number of our SP services are located west of the Bann where it is already well established that health and social outcomes lag behind the rest of the country. Many Supporting People services are jointly funded with Department of Health (DoH) through the five HSC Trusts. Any change in funding through the SP programme will place additional pressure on the health budget which is already in a critical position. We would be concerned that any reduction in the SP budget could, sadly, also place financial pressure on the Department of Justice if people with mental ill health lose their vital support.</p> <p>11.5 In the midst of a housing and homelessness crisis, with record high numbers of households with homelessness status, it would be completely illogical to cut resources to the Northern Ireland Housing Executive (hereafter NIHE) and to the Supporting People Programme (hereafter SPP). Taking this path will make an already challenging situation even worse. It is highly likely to have the effect of seeing more people fall over the edge into homelessness with all of the consequences this can have for them and for this society as a whole. We urge DfC to do everything in its power to ensure resources are not diverted away from homelessness services.</p> <p>11.6 A substantial proportion of the SPP budget, around 38%, goes towards funding homelessness services in Northern Ireland.¹⁹ Before 2022/3, the budget for the SPP had been frozen at the same level as it had been in 2007. For fifteen years, year on year, the value of the fund had been eroded by inflation. While other comparable sectors (such as Health and Social Care) saw budget rises, SP funding stagnated. We could not see the rationale</p>	<p>Department received no additional funding in 2023-24 to address these pressures and the Department's overall Resource allocation was subject to reduction.</p> <p>The Department acknowledge Supporting People funding provides vital services and that the reduction will have adverse impacts on several of the groups protected by Section 75, as such consideration has been given to this when determining final budget allocations, and Supporting People has been sustained at 2022-23 levels.</p>

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		<p>behind why the SPP has been differentially treated from other areas of the DfC budget in the Equality Impact Assessment. For example, considerable detail is given on cuts to the Discretionary Support Grants and the impact of a reduction in capital funding. In contrast, the section on SPP is vague and fails to capture the wide-ranging impact on individuals within a range of section 75 categories who are being supported through the SPP. a cut to the SPP fund should not even be countenanced as a possibility. The costs of taking this step would fall on those who are least able to afford it rather than those with the widest shoulders. Our member organisations who are funded through the SPP have told us that any cut to what they receive from the programme would have a deeply damaging impact on those they work with and their own services. In some cases, it could lead to service reductions, job losses or even consideration of service closures. If this was to happen, the impact would cascade down throughout the housing and homelessness system placing more pressure on other agencies in both the immediate and long-term.</p> <p>The challenges around the recruitment and retention of staff will worsen further with all of the consequences this can have for the quality of service provision. As the Supporting People Strategic Needs Assessment published in 2021 made clear, a 14% gap already existed between the level of need out there and the supply of support available. This situation has only worsened since the Strategic Needs Assessment was published with the advent of the cost of living crisis. We are also cognisant of the wider budgetary picture across the NI Executive as a whole. Cuts to the budgets of other Executive departments will undoubtedly have consequences for SPP providers. A few examples include: longer waiting lists for health services such as mental health and addiction support; further delays in the courts and lack of rehabilitation services in prisons; impacts on asylum and refugee services; and difficulties with infrastructure slowing down house building. The</p>	

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		<p>challenges facing other Departments will spill over to impact homelessness services. It is often homelessness services that are left picking up the pieces from wider societal problems as the final backstop for people with no other options. The fear is that on this occasion services in the sector may not be able to provide the support which is needed due to a lack of resources. It is abundantly evident that any cut to the value of the SPP should be avoided. In the midst of a cost of living crisis with high and increasing numbers in temporary accommodation and growing social housing lists the possibility of a cut to the SPP fund should not even be countenanced as a possibility. The costs of taking this step would fall on those who are least able to afford it rather than those with the widest shoulders. We implore DfC to explore every alternative option before taking this misguided approach.</p> <p>11.7 The SP programme funds almost two thirds of the of homeless services and underpins vital supported housing services for around 20,000 vulnerable people in Northern Ireland. It allows them to live independently and helps prevent hospitalisation, homelessness or premature admission to residential or nursing care.</p> <p>11.8 There is clear evidence of a multiplier effect in terms of social value for every pound spent on SP services, with a report published in 2021 finding the following: “The Supporting People Programme over the two-and-a-half-year period 2018 to the first two quarters of 2020/21 generated a social value of £1: £5.71. This is based on a Total Present Value of £1,038,786,036.30 created against the input of £182,000,000.”¹¹ Yet despite this remarkable return, resources have not increased in line with inflation, reducing the potential impact that the programme could have.</p> <p>11.9 Cuts to the Supporting People programme will have a long-term detrimental effect on service users as cuts to the service could affect the</p>	

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		<p>health and wellbeing of service users which will cost Government more in the long term.</p> <p>11.10 Supporting People is a vital programme which supports more than 19,000 people to live independently. This support is provided by a range of organisations, including housing associations. While the impact on the individual service users is clear, there is also a consequential benefit, in that it reduces pressure on the health service by keeping people out of hospital or other care facilities. The social return on Supporting People is in the region of 5.71 for every 1 invested. For 15 years the Supporting People budget has been frozen, which is in effect a cut when inflation is factored in. More recently there has been a small uplift in the budget provided, but with rising staff costs and increased demand for service, Supporting People remains stretched. Any reduction in this budget would stretch the service too far. Reductions in service would impact on the independence of many people and put further pressure on the health service, as well as on the justice and the benefit systems. The NI Housing Executive has already identified over 4m in Supporting People funding shortfalls which are being absorbed by housing associations and other providers. The inflationary impact on a static budget over 15 years has left the Supporting People programme at a shortfall of 32m. Additional investment now will also allow providers to invest in staff recruitment and retention as well as grow services to meet increasing need, and we would like to see the budget raised to 100m per year. We appreciate the difficulty you are facing in setting a budget and prioritising services at this time; however we believe that investment in housing brings positive benefits in the short, medium and long term. Our call for increased funding for the Social Housing Development Programme and for the Supporting People programme was discussed at a recent meeting of the NI Assembly All Party Group on Housing. It is supported by a broad range of</p>	

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		<p>political parties, including those who have co-signed this letter, and the housing sector in Northern Ireland.</p> <p>11.11 We would seek clarification on whether the baseline 5% cut proposed to Arm's Length Bodies is also being applied to SP. The SP programme funds almost two thirds of the of homeless services¹¹ and underpins vital supported housing services for around 20,000 vulnerable people in Northern Ireland. It allows them to live independently and helps prevent hospitalisation, homelessness or premature admission to residential or nursing care. The cut will present a challenging environment for providers and for people in receipt of support.</p> <p>11.12 Many individuals with very complex needs straddle several groups within the section 75 categories, any reduction to the Supporting People funded projects that provide support to them will disproportionately impact these individuals. For example, Homeless individuals who have an addiction, suffer from mental ill health, learning disability and/or have an offending background.</p> <p>11.13 The EQIA document recognises that a number of Section 75 groups may be disproportionately impacted by a reduction in funding. Recognising that even a stand-still budget with regard to Supporting People will in effect cause a real-terms cut due to rising costs, there is a risk that the 2023/24 budget will have a disproportionate impact on the services provided by PCI to men and people with disabilities. It is well known that prior to 2022/23 the baseline funding for the Supporting People Programme had remained static since 2007. This in turn resulted in a reduction of funding to the key services provided to vulnerable people who need housing support, negatively impacting staff, and also limiting the prospect of extending services to others in need. Recruitment and retention continue to be a significant challenge. It is</p>	

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		<p>notable that the 2021 Social Return on Investment Study of the Supporting People Programme identified that over a 2½ year period from 2018 to the first two quarters of 2020/21 the Supporting People Programme generated a social value of £1:£5.71. This multiplier effect in terms of social value demonstrates the positive benefit which the Supporting People not only has on its service users, but also more widely. PCI recognises the very difficult situation in which the Department for Communities and the NI Housing Executive must make decisions about budget allocations in the context of a shrinking pot. The decision to keep the SP budget for 2023/24 at the same level as 2022/23 is welcome as any further cuts to the Supporting People Programme have the potential to have a damaging impact on the provision of services, and consequently the users of those services. This in turn risks creating further pressures in other parts of the statutory and public sector, including other support agencies and the wider health and social care sector. Conversely cuts in other parts of the public sector will have a negative impact on the Supporting People Programme. Against this background PCI would urge the Department to find any way possible to continue to protect the Supporting People Programme from the worst of the anticipated budgetary cuts. To do otherwise will only increase pressures and costs elsewhere in the system of support for these vulnerable individuals and create significant challenges which will take years to rectify in the future.</p> <p>11.14 Impact likely on the 19,000 people annually supported by SPP to live independently, including those experiencing homelessness, young, old and people with a disability, including mental health and learning difficulties.</p> <p>11.15 Concern over a reduction in funding to the Supporting People Fund which provides essential supports and services to some of the most vulnerable in our communities such as women and men who are victims of domestic violence, people with disabilities, and people experiencing homelessness.</p>	

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		<p>11.16 This programme is vital in assisting people to live independent lives. Any cut to this service will have a long term detrimental affect on service users. Again this is short sighted as cuts to the service could affect the health and wellbeing of service users which will cost Government more in the long term and add to existing pressures on the Dept of Health and other Government Agencies. Service users will almost inevitably be negatively affected by multi agency cuts also.</p> <p>11.17 Any cut to this service will have a long-term detrimental effect on service users. Cuts to the service could affect the health and wellbeing of service users which will cost Government more in the long term and add to existing pressures on the Dept of Health and other Government Agencies. Service users will almost inevitably be negatively affected by multi agency cuts also.</p> <p>11.18 The Council would be concerned about any proposed reduction in the ‘Supporting People Programme’ given its focus on supporting vulnerable people (particularly those experiencing homelessness, young people, older people, and people with a disability including mental health and learning disabilities) to live independently. As referred to in the consultation document, any reduction in funding will directly and disproportionately impact on a number of Section 75 groups. The Council would also highlight the possible disproportionate impact on vulnerable people across Belfast based on the current level of need and support provided in the city.</p> <p>11.19 Any cut to this service will have a long-term detrimental effect on service users. Cuts to the service could affect the health and wellbeing of service users which will cost Government more in the long term and add to existing pressures on the Dept of Health and other Government Agencies. Service users will almost inevitably be negatively affected by multi agency cuts also.</p>	

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		<p>11.20 This programme is vital in assisting people to live independent lives. Any cut to this service will have a long-term detrimental effect on service users. Vulnerable people need support. We need to support them to live independently and if possible, to reach them before they hit crisis point. Many of our vulnerable people come from areas of multiple deprivation and much more needs to be done to help them at an earlier stage.</p> <p>11.21 A proposed cut to the Supporting People Budget, will likely increase the financial pressure on Harmonl’s activities and have detrimental impacts on staff and clients. Supporting people are one of Harmonl’s key funders.</p> <p>11.22 Harmonl notes that research suggests, 86% of people sleeping rough are male (ONS 2018). Therefore, males and in particular males without dependents face an increased risk of homelessness. Much work has been done across the globe to identify solutions tailored specifically to males, yet without adequate resourcing and funding to implement such solutions and recommendations, it is likely such trends and inequalities continue to exist (if not worsen) as a result. Indeed, being male is not the only factor that contributes to the risk of homelessness, being from a Black or Ethnic Minority background also increases the risk of homelessness. Recent research also suggests that experience of racial discrimination is linked to an elevated risk of homelessness (Bramley, Fitzpatrick, McIntyre, & Johnsen, 2022). Additionally, there is overwhelming evidence to suggest that people from Black and other ethnic minority backgrounds experience disproportionate levels of homelessness in the UK. Poor health and mental health have been shown to be both a cause and result of homelessness. Research shows that those with poor health outcomes or a disability are at an increased risk of experiencing homelessness (Public Health Authority, 2018). 78% of people experiencing homelessness report having a physical health condition</p>	

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		<p>compared to just 37% of the general population with 44% having a mental health diagnosis compared to just 23% of the general population (Homeless Link, 2016).</p> <p>11.23 "Women's Platform are concerned re the funding of ""The Supporting People fund is particularly important from a preventative perspective. The services supported by the fund enable disabled people to live more independent lives and engage in society, which reduces demand for health and social care, including expensive residential care.</p> <p>11.24 The indicative allocation of £72.9m for the Supporting People programme, which provides housing support services to approximately 19,500 people, to enable people to live independently in the community, does not allow for unavoidable cost pressures experienced by provider organisations. This budget therefore will remain under significant pressure.</p> <p>11.25 If Supporting People services are not adequately funded, there will inevitably be closures given the lack of uplift from 2007/2008 and in particular some of the Section 75 groups affected may not be capable of living independently. This may place additional demands on the health care system and homeless services and result in services users being placed in less suitable, higher cost care services. It is therefore important that:</p> <ul style="list-style-type: none"> • more up-to-date data is considered in regard to the future viability of such services, considering the implications for accommodation and care where these are jointly provided. • given the vulnerability of the Section 75 groups supported through this programme, the adverse impact on each group should be measured 	

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		<p>and include consideration of: the ability of individuals to live independently if SP funding is cut; the future viability of services, particularly those that are jointly funded/provide accommodation. (Could individuals potentially lose their home? Will these section 75 groups be disproportionately impacted not only by the SP cut but also the knock-on effect in regard to their accommodation and care needs).</p> <p>11.26 A cross-departmental approach needs to be taken to any cuts proposed to Supporting People funding, particularly where Housing Support is not provided in isolation and the impact could result in an individual being adversely impacted as a result of the 'knock-on' effect arising, particularly in services providing accommodation, support and care. The impact of this on health and homeless services should be considered and a joint approach taken.</p> <p>11.27 In particular – older people, people with a disability, young people , and females with children will be significantly impacted by proposed cuts to the Supporting People and Social Housing Development programmes.</p> <p>11.28 Cutting services to those affected by domestic abuse will have an adverse effect on people.</p> <p>11.29 UNISON believes that the Supporting People Programme is vital, but that even in advance of this proposed budget, it has suffered from chronic underfunding, negatively impacting on the standard of service delivery and which has had significant adverse impact on our members. UNISON has significant membership across Supporting People provider organisations, and low pay and poor terms and conditions are common across the sector. UNISON has been campaigning for urgent action to be taken to reverse the real terms funding cuts that have occurred within the Supporting People</p>	

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		<p>programme and to improve pay, and terms and conditions for our members. We note that the 2023 - 24 budget will not provide for a Supporting People provider uplift which had been sought. This is particularly concerning, as UNISON believes that vulnerable people and our members are already disadvantaged as funding has not risen to match demand and the increasing cost of providing services. In our discussions with employers in the sector over the last number of years, we have been advised by them that there was no inflationary uplift in budgets for the Supporting People Programme since 2008. In effect, they estimate that this has led to a real terms cut of over 30%. UNISON had sought that not only adequate funding be put in place, but that funding for Supporting People providers translate into decent pay and terms and conditions for the workforce. The precise level of cuts to existing levels of funding that is anticipated is not clearly articulated by the Department. The Department must clarify what reduction in funding is being proposed for the Supporting People Programme. Consideration must be given to the impact that any cuts to this Programme will have on the wider public purse as Centre for Economic Empowerment evidence shows that every £1 spent on the Supporting People Programme saves the public purse £1.90 elsewhere, across health, social care, benefits, criminal justice and housing. UNISON has been engaging with both the Department for Communities and the Housing Executive, calling for them and all other Government Departments and public bodies with responsibilities in this area to both immediately reverse the cuts that have previously taken place and review all funding arrangements that community and voluntary sector employers have to provide services under the programme, so as to ensure that workers across supporting people providers have decent pay and terms and conditions. This budget runs contrary to the approach that is required, and we are very concerned that it will have detrimental adverse impacts both on those accessing Supporting People services and on our members.</p>	

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	<p>11.30 It's imperative that the Supporting People budget remains ringfenced at 2022-23 levels as failure to do so will have an immediate serious impact on our ability to maintain service delivery at current levels, will increase growing waiting lists and push the risk of protecting these young people back into deprived communities dealing with growing unrest and exploitation of the vulnerable.</p> <p>In order to maintain these vital services, young people should be recognised as a specific group in need of housing support in order to enable them to have a home which is safe and secure and that will provide them with opportunities to participate in society and reach their full potential.</p> <p>11.31 Support People Programme - Any reduction in Support People funding will affect Section 75 including older people and people with a disability including mental health and learning disabilities who would be disproportionately impacted. It is also appropriate to include 'men and women generally,' i.e., women who are at risk of domestic violence who out of the groups identified as having significant shortfalls in supply of housing support in 2020 have a service shortfall of 49%.</p> <p>11.32 A number of Section 75 groups including older people and people with a disability including mental health and learning disabilities may be disproportionately impacted by a reduction in funding.</p> <p>11.33 Tenants associations of Sheltered Dwellings not consulted on proposed cuts to Supporting People.</p> <p>Communities Minister has failed to regulate Housing Associations and thereby failed to protect non-housing benefit tenants. Only NIHE Tenants</p>	

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		<p>benefited from Minister's Rent freeze. Non-housing benefit tenants had to suffer huge rent increases levied by Housing Associations who completely ignored the freeze.</p> <p>11.34 <u>Review of data in Audit of Inequalities</u>: it is clear that there are gaps in terms of:</p> <ul style="list-style-type: none"> • The experience and views of people with a disability in terms of support to access suitable housing. • Data reviewing the impact of changes where a person with a disability has multiple risk factors (e.g. a young person with a disability who also has mental health needs and is facing homelessness, or an older person with a disability with complex medical needs requiring specialist adaptations within their home). • Lack of outcome data for people with a disability. All schemes funded through Supporting People have to provide quarterly and annual outcome data (in relation to all individuals supported) however the Equality Assessment provides no summary outcome data to evidence impact of current funding arrangements. The Audit of Inequities references the outcomes for people with a disability (P10) but does not provide any information in terms of summary outcome data linked to current funding. The interventions supported through the programmes are designed to enhance improvements in a range of key outcomes, such as health, education, employability, community development and cohesion. • Finally there is no cost analysis provided in the documents in terms of the likely long-term costs for other government departments (e.g. 	

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		<p>Department of Health) as a result of planned cuts in the Department for Communities budgets and supports for vulnerable groups.</p> <p>Adverse impacts - Potential devastating impacts on lives of most vulnerable groups in our society, including people with a disability. For many people, there is the potential for multiple and cumulative impacts, through different budget cuts, within and outside departments.</p> <p>We believe that this is a short-sighted, short-term approach given the potential impact of these proposed cuts and the likely rise in costs for other government departments as a result of cuts to the Department for Communities, particularly in DoH, given the duty of care it has to respond to and support people in crisis (as a result of a lack of basic support in terms of housing, employment and benefits). E.g. if Supporting People funding for housing support was cut, either Trusts would have to meet the shortfall or the person supported would lose their individualised support with a return to outdated and archaic congregational living or increase in expensive hospital admissions.</p> <p>The cuts being proposed:</p> <ul style="list-style-type: none"> • will expedite the dismantling of essential preventative support available to the most vulnerable in our society. • could result in essential, commissioned services – such as supported living services that provide safe and effective care no longer being financially viable and providers having to cease contract arrangements with HSCTs • if providers are forced to cease contracts with HSCTs, this could result in expensive, alternative placements (e.g. in GB) 	

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		<ul style="list-style-type: none"> are inconsistent with all government policy positions and strategies in terms of strengthening preventative, community-based approaches to health and well-being. Not only are the plans morally and ethically unacceptable and likely to result in significant harm and distress to the most vulnerable and marginalised people in our society, they make no business sense as the total costs for government (across all departments) are likely to far exceed any proposed savings. Our view is that given the potential impacts of implementing these plans, no overall saving will be achieved. 	
12	Urban Regeneration	<p>12.1 It is important that our city centres become places for living. This can only be achieved with DfC financial investment in urban regeneration initiatives and projects. Failure by DfC to invest will result in cities and towns declining, adversely impact on local communities, loss of investment in reduced growth.</p> <p>12.2 Capital and Urban Regeneration – We would highlight the public consultation on A Bolder Vision and the requirement to provide fully accessible and prioritised investment to Derry NRA'S to enable inclusive growth and investment, and to reduce severance to communities and the wider city.</p> <p>Funding - Sub optimal capital financing – limitations to in year capital funding. Prioritisation of investment aligned to agreed policies and strategies. Ensuring the region has access to the same funding as financing for regeneration as other UK cities.</p> <p>Treatment of revenue and capital to address resource shortfall.</p>	<p>With DfC facing a Capital funding gap of £59m in 2023-24, the Department acknowledges that managing a Capital pressure of this magnitude will undoubtedly have a significant and adverse impact on the Department's ability to meet demand for capital programmes which support public services in 2023-24.</p> <p>The Department has consider the points raised when prioritising its Final Capital budget allocations for 2023-24, while working to ensure allocations will be made in the most effective way possible too support areas most in need.</p>

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		<p>Collaboration – commitment to work collaboratively with Council, private sector and the community sector to unlock key challenges to the development and regeneration of the city.</p> <p>12.3 Capital and Urban Regeneration – the public consultation on A Bolder Vision and the requirement to provide fully accessible and prioritised investment to Belfast city centre to enable inclusive growth and investment, and to reduce severance to communities and the wider city. The main impacts will be accessibility issues to the city centre, having a limited impact on investment for jobs and inclusive growth, and a continuation of the current severance issues to opportunities within the city centre. We are concerned that the current in year capital financing is prohibiting the growth of the city (Belfast) and indeed the region.</p> <p>12.4 Capital and Urban Regeneration. East Belfast has been under invested in with many derelict buildings and obsolete parcels of land. Reductions in funding will hampers the regeneration efforts. Therefore, we call for prioritisation of investment aligned to agreed policies and strategies to ensure Belfast has same funding as financing for regeneration as other UK cities. Regeneration of East Belfast is dependent on all sectors being able to work together effectively. The reductions in budgets will weaken community and statutory infrastructure making it harder to bring about the kinds of regeneration needed to support many of those falling into the Section 75 Categories such older people and those with dependants.</p> <p>12.5 Council has worked in partnership with the DfC Urban Regeneration team over the last number of years in driving regeneration in all our main towns. The investment impact to our towns due to the funding contribution has been significant. All of the public realms and urban regeneration grants have had a major impact on economic growth. The continuation of the urban</p>	

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		<p>regeneration grants and support remain critical as spending power has fallen and continues to fall and businesses are forced to close, leaving towns having to reinvent themselves as leisure and event spaces.</p> <p>12.6 The proposed stopping of investment into the Urban Regeneration programme will have an advert impact on older people and those with disabilities, as outlined in the EQIA. It is directly at odds with the Ageing Friendly agenda. Further details are requested of the proposed cuts, evidence relied upon of adverse impacts and mitigations offered by the Department.</p> <p>12.7 We encourage a commitment to work collaboratively with Councils, private sector and the community sector to unlock key challenges to the development and regeneration across NI.</p> <p>12.8 The Urban Regeneration programme - if Belfast is not supported to thrive then NI will collectively lose out on FDI, tourist spend, small business cluster development, cultural vibrancy etc and we will continue to lose our young people to cities which provide a much more attractive mix in other jurisdictions.</p> <p>12.9 Belfast City Council's draft Economic Strategy for Belfast (2022-2030) aims is to support our sustainable and inclusive growth ambitions for the city. Cuts to DfC's budget will have an adverse impact on our delivery of interventions to address skills gaps (Action 6) and in developing inclusive employability programmes (Action 7). It will severely hamper our city's ambitions in:</p>	

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		<ul style="list-style-type: none"> • Creating inclusive pathways to jobs and careers by 2030 for those further back in the labour market and cut access to better jobs for those who are underemployed; • Reducing the proportion of economically inactive people of working age (by 2030 to 23 per cent from 30.1% in 2020), in alignment with the Belfast Agenda; • Cutting the proportion of the Belfast working-age population with no qualifications to 12%, reducing the working-age economic inactivity rate (excluding students) within the city to 18% and increasing the working age population who have attained Level 3-5 qualifications to 56% as well as doubling the number of Belfast residents entering the labour market each year with mid-level skills (at NQF levels 3-5). • Reducing the proportion of working age population with no qualifications from 14.2% in 2017 to 10% by 2030, in alignment with the Belfast Agenda . The Belfast Agenda 2015-2035 sets out key strategic ambitions for the city. Working and Learning is one of the key priorities of the agenda which acknowledges that our skills base is vital to competitiveness, productivity, inclusiveness and growth; and • Supporting the inclusive growth ambitions of the Council by targeting interventions on key cohorts: young people not in education, employment or training (Proportion of school-leavers entering employment, education or training), residents not in employment, residents with low skills levels (this will be measured by the proportion of working age population who have attained Level 2 or above) and in work, low earning residents. 	

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		<p>12.10 Highlight the public consultation on A Bolder Vision and the requirement to provide fully accessible and prioritised investment to Belfast City Centre to enable inclusive growth and investment, and to reduce severance to communities and the wider city. The main impacts will be accessibility issues to the city centre, having a limited impact on investment for jobs and inclusive growth, and a continuation of the current severance issues to opportunities within the city centre.</p> <p>12.11 Stopping urban regeneration investment could have a disproportionate impact in younger people. Urban Regeneration funding is crucial for the safety and wellbeing of those who live, work and visit the town centres. Absence or reduction of this funding will impact on social inclusion for section 75 groups. The Town Centres are the hub to bring people together, lack of investment will impact on economic growth, employment and wellbeing of citizens.</p> <p>12.12 A need for future funding mechanisms, influence on policy direction, legislative change, and funding prioritisation to address and overcome the significant issues that are impacting our town and city centres. In our view the recommendations of the High Street Taskforce should be costed by DfC and presented as priorities in multi-annual budgeting processes across departments. We would highlight the scale of commitment demonstrated through the £820 million ‘Future High Streets Fund’ and the £1.6 billion ‘Stronger Towns Fund’ put in place to support the high streets of over 200 towns within England, via councils. Similar investment programmes of scale, centrally funded, have been brought forward in Wales and Scotland. A similar level of investment or commitment is currently absent in Northern Ireland and consideration needs to be urgently given to a dedicated fund of scale to enable emerging investment plans to be developed in accordance with local community planning, development planning and growth planning</p>	

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		<p>priorities for Belfast. This could potentially bring together multi departmental, council, and other sources of funding into an aggregate multi-annual fund. Such a fund could be allocated and administered through councils and subject to all partners (including government departments) working to deliver an agreed solutions / action plan.</p> <p>12.13 Cities, Towns and Villages – We believe strongly that towns, villages, and city centres should be places where people want to live, work, shop and visit and understand that there needs to be a balance across the Region in terms of investment in these. This is true for cities too. Belfast is everyone’s main city and its important it plays its role as a centre for commerce, culture, tourist attractions, recreation, entertainment, learning and employment. Its core centre area needs to be reimagined entirely to ensure it can continue to perform these important roles for all areas to derive benefit. This will take investment. If Belfast is not supported to thrive then NI will collectively lose out on FDI, tourist spend, small business cluster development, cultural vibrancy etc and we will continue to lose our young people to cities which provide a much more attractive mix in other jurisdictions. This is not simply a matter of saying Belfast is big enough and so will survive. Without investment any growth will be sub-optimal for all the people across the island, and we will continue to suffer from low productivity levels and higher rates of economic inactivity and poverty. The Council seeks for the Department to work with it, to set out the role of Belfast and consider the support needed to strengthen its role in positioning the region for investment and innovation. Belfast City Council, alongside partners, has carried out extensive work, through the Belfast City Centre Regeneration & Investment Strategy, BRCD Programme, Belfast Innovation City, the Renewed Ambition public private partnership, our Future City Centre Programme, Cultural and Tourism Strategies and work to support arterial routes/neighbourhood centres. These all provide a strong platform to support the diversification of the High Street</p>	

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		<p>while still ensuring support for our retail and business population. These programmes and policies are supported through extensive research and best practice and require strong leadership and commitment across all our public and private sector partners and the NI Executive particularly in terms of policy, legislation and financing. There is a need for place-based leadership across NI which brings together key partners, interests, and stakeholders with a focus on high streets and significantly better coordination between central and local government, together with a recognition that local government can be best placed to deliver and support local interventions.</p>	
13	Voluntary & Community Sector	<p>13.1 It is well documented that the VCSE sector is overstretched and already struggling to meet demand, which we can only anticipate will be further increased, if and when the proposed budgetary cuts are implemented.</p> <p>13.2 (Cuts to ALB's) Will disproportionately restrict access for those from deprived areas, with disabilities, older people or migrant workers/ethnic minorities. Will impact on children, especially from deprived households, who often use libraries to access computers, the internet, learning resources or even as a safe space for study and who access sports and as a diversionary alternative to Anti-Social Behaviour.</p> <p>Will disproportionately restrict access to justice or representation by the children, older people and those relying on charitable support e.g. those from deprived areas, with disabilities, older people or migrant workers/ethnic minorities.</p> <p>13.3 In making decisions in areas under the responsibility of the Department for Communities, particularly in the areas of arts it is worthwhile to ensure that cuts to community-based organisations do not mean that these organisations</p>	<p>The Department recognises the vital services provided by the Voluntary and Community sector through a number of programmes (Supporting People Programme is dealt with separately) and on the basis no cuts too these programmes are planned as part of the 2023-24 budget allocations.</p> <p>The Department recognises the important role of our ALBs and their valuable work, particularly supporting all Section 75 groups, and has sought to minimise the impact on ALBs by not passing on the full extent of the cut it faces in 2023-24. As already stated, the Department will continue to work</p>

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		<p>can no longer function effectively. The loss of funding provided by the Arts Council may result in the entire centre having to be closed.</p> <p>13.4 Cuts to the Commission’s budget will impact its capacity to process the closure of Charities leading to charitable assets potentially leaving the sector and not being reassigned to other charities who will have beneficiaries across the Section 75 categories. It will also affect the Commission's capacity to address concerns from each of the S75 groups, process timely registrations and process investigations to protect individuals from mismanagement and misconduct.</p> <p>13.5 Arm’s length bodies play a pivotal role in the economic, health and wellbeing of our society. Any reduction in these services would be very short sighted and will have a negative long-term affect. Any reduction of funding to USEL will have a detrimental impact on the lives of people with disabilities particularly those living in areas of multiple deprivation.</p> <p>13.6 Within the EQIA there is reference to possible reductions in funding for Charities Commission NI, NI Commissioner for Children and Young People and Commissioner for Older People NI, would be concerned that reductions to these areas of work may impact the statutory work they carry out and therefore adversely impact on section 75 groups including children, young people and older people.</p> <p>13.7 VCS cuts would have catastrophic effect on the ability to deliver much needed services and programmes within communities. VCS interventions, usually measured in the longer term, represent excellent value for money - changing the lifepath trajectory of even one young person can more than</p>	<p>with ALBs to minimise any impact on service delivery.</p>

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		<p>compensate for literally years of societal costs which would otherwise be incurred.</p> <p>13.8 VCS sector cuts will impact on services to children and young people up to 18 years.</p> <p>13.9 With the Pathway Fund set to cease in June 2023, there will be a loss of local early years education and learning services in 187 of the most disadvantaged areas in the North. This will have a significant negative impact on over 10,000 children aged 0 - 4 years old.</p> <p>Our service is situated in the 3rd most deprived area in the North.</p> <p>Our children are Covid children who entered our setting in September 2022 with:</p> <ul style="list-style-type: none"> • Speech delays • Lack of interaction with their peers – unable to socialise with their peers • No routine • Undetected traits of additional needs. <p>The impact of these cuts will have a long-term detrimental effect on our organisation. What this will mean for us, is as follows. The loss of:</p> <ul style="list-style-type: none"> • childcare jobs • 12 pre-pre child places • 12 creche places <p>Our family support offers the following service within the Outer West Neighbourhood Renewal area:</p>	

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		<ul style="list-style-type: none"> • Life start home visiting early intervention programme to 150 parents/carers of children birth to 5 years. This programme has proven through a longitudinal study to support parents create the best possible environment for their child to develop and is delivered to parents on a one-to-one basis in their own home. • Life start 'At Home In School' programme to 50 families. This programme is a transition programme for parents of children of Nursery, transitioning into P1. • Our Family Support Hub, which deals with 350 families of children falling below the statutory thresholds for intervention. <p>The action that we are putting forward is that early intervention needs investment, rather than cuts. By cutting DE and DfC budgets, this will leave our Neighbourhood area in a worse situation, by rolling it back 30 years.</p> <p>13.10 The Department should continue to ensure that the role and impact of the independent advice network is recognised and respected. Withdrawal of funding support by the Department to some third party organisations may lead to viability issues or closure of the bodies (more information needed on the likelihood of this option taking place and which organisations may be affected). The Department should ensure transparency, due process and a challenge mechanism for any third party organisations that may see their funding threatened, as a mark of respect for staff and service users.</p> <p>13.11 Without funds at present Women Centre Derry would be closed and women and children would be abandoned within the Derry City and Strabane District Council. As these organisations that offer specialist support services to Section 75 groups have been hugely impacted, further reductions to their</p>	

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		<p>funding would result in closures leaving Section 75 groups vulnerable and abandoned.</p> <p>13.12 Departments could develop a more holistic approach to funding in order to create long term efficiencies. In line with 2.2 of the Equality Impact Assessment, there is little data to support the requirement for the Department to have “due regard to the desirability of promoting good relations between people with different religious beliefs, different political opinions or from different racial groups”.</p> <p>Recent data published by NISRA on T:BUC showed that community relations are worse now than they have been in over a decade.</p> <p>13.13 Although Neighbourhood Renewal has been retained this will not mitigate the effects of the cuts on the poorest areas and communities including all the Section 75 groups experiencing multiple and overlapping disadvantages.</p> <p>13.14 Housing Rights notes that community and voluntary sector organisations funded by the Department for Communities are not expressly identified in the draft EQIA, other than in reference to ‘Third party’ organisations, which it is assumed covers C&V sector funded organisations. Housing Rights would urge the Department to strongly consider the impact on C&V sector organisations and on the communities they support – many of whom are already experiencing inequality. C&V funded organisations who rely on core funding from the Department, including Housing Rights, exist in service of the promotion of equality, prevention of homelessness and relief of poverty.</p> <p>13.15 One of the things that community sector does most effectively is enable and provide access to the essential services provided by DfC. The DfC is well aware of the evidence that many in the Section 75 groups and those</p>	

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		<p>living in the most deprived areas communities find it harder to access services and benefits and many can drop through the safety net. The community sector reaches those hard to reach groups. Community groups are able to recognise the complexity and totality of people’s experience and therefore play a critical role.</p> <p>13.16 Social funding for community groups means helping the most marginalised groups access the services provided by DfC. This includes especially those in areas of multiple deprivation. The community sector helps DfC link to those who are most in need of their services but who often slip between the cracks of state provision. We advocate for actions that preserve the community infrastructure that helps DfC deliver to the poorest and most marginalised communities. The cuts that have already happened along with the proposed cuts will in our view severely weaken the community and voluntary sector infrastructure and result in long term and irreversible harm.</p> <p>13.17 The cuts that have already happened along with the proposed cuts will severely weaken the community sector infrastructure and result in long term and irreversible harm. Many areas of community development funding provide support to the most vulnerable in our society and therefore are not ‘icing on the cake’ category but are in fact, daily in the fight to build strong, sustainable communities. In evidence to the NI Select Committee in May, Jayne Brady acknowledged the essential and unique role of the community and voluntary sector – ‘Those community and voluntary sector groups are the ones, as well as the civil servants, who allowed us to progress through the pandemic. They stepped in and did the impossible in many cases. They have been rooted in knowing local solutions to local problems.’</p> <p>13.18 UNISON notes that amongst the Ministerial priorities for which £375 million of new bids for funding were made which has not been allocated, reference</p>	

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		<p>is made to seeking replacement European Social Fund (ESF) support. We would seek further detail from DfC with regards to both the level of funding that was sought and how it was intended that such funding would be deployed. UNISON represents members across community and voluntary sector organisations who were previously funded through ESF. There has been widespread concern and uncertainty across our membership as ESF has ended and the UK Shared Prosperity Fund has come online. We are mindful that a number of provider organisations that had previously been funded via ESF have not been successful in securing replacement funds via the Shared Prosperity Fund. As the consultation document identifies, the removal of ESF funding, combined with the pausing of Labour Market Partnerships from 1st July, will cause significant adverse impacts across a range of section 75 groups seeking work or seeking support to remain in work. It is of obvious concern to us that any possible measures DfC may have considered to try and replace ESF supports have been stalled due to a lack of funding.</p> <p>13.19 Departments must understand that the uncertainty in funding is already having an impact on retention of staff and the delivery of services, and cutting funding will decimate the vital VCS infrastructure in some cases irreversibly or in such a way that it will not be able to be restored should funding be increased again in the future.</p> <p>13.20 We also wish to stress that not only is there a need for sufficient staffing levels within the Department to better support people with the complexity of the benefits system and with Universal Credit but there is equally a need for sustainable, long-term funding for voluntary and community sector partners to help with this work.</p>	

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		<p>13.21 The Community Development section receives funding from the Department for Communities' Voluntary and Community Division (VCD) under the Community Support Programme (CSP). The CSP provides funding to councils to support council-managed community development and advice services. In delivering the Community Support Programme (CSP), Councils match fund the Department for Communities' award, and overlay lower level objectives and targets to shape localised programmes for individual council areas. Councils are responsible for ensuring their programmes align with the high-level objectives for CSP. The Community Support Programme which is funded by the Department is not mentioned within the EQIA budget 2023-24, however, DCSDC would like to emphasise the importance of this funding allocation to Councils to support the delivery of Community Development to the Community & Voluntary Sector. The CSP supports a range of the section 75 groupings, if cuts are to be made to the CSP budget this would have detrimental implications to the Community & Voluntary sector and in-particular section 75 groupings.</p> <p>13.22 Each of the impacts has been presented individually but the exercise fails to examine the cumulative and multiplicative impact of all the cuts on a geographic basis. Those on the margins who are members of S75 groups will find little support from government agencies while also seeing the community and voluntary sector cuts with e.g. adverse impact on their accessing support from advice centres, food banks and playgroups who have also been cut back. These impacts will fall on a group struggling already to cope with a cost of living crisis, energy and food inflation at record levels and housing stress across the DCSDC area.</p> <p>13.23 The community sector reaches those hard to reach groups. Community groups are able to recognise the complexity and totality of people's experience and therefore play a critical role. The proposed cuts will severely</p>	

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		<p>reduce the capacity of the sector. The budget delays have already had an effect on the community sector's capacity, the most essential ingredient of which is staffing. These will cause long term unforeseen and unplanned effects.</p> <p>13.24 The proposed cuts will severely reduce the capacity of the sector. The budget delays have already had an effect on the community sector's capacity, the most essential ingredient of which is staffing. These will cause long term unforeseen and unplanned effects.</p> <p>13.25 A key area for development is further realising the Community Planning powers a cross each council area to accelerate further collaborative working. In the context of the DfC resource budget, it is requested that funding for each Council is received as one grant and gives the council the autonomy to spend on a needs driven basis, emanating from the local Community Plan. This in itself may generate efficiencies through removal of duplication in administration of various funding streams provided to Councils. This translates to the Community Festivals Fund, Community Support Programme and other in year grants (Youth age Friendly) coming as one collaborative grant. It is also requested that TEO work s with DfC to merge the Good Relations budget with the Community Support budget to create one overall grant.</p> <p>13.26 Greater Falls Neighbourhood Partnership note that even though statistics will show that West Belfast is an area of high complex need, and deprivation, 25 years after the Good Friday Agreement much has changed for the better in our society and across our communities, but the deep impact of these proposed spending cuts will potential rollback progress made and reinforce life inequalities across economic, educational and health lines to a level that will be hard to come back from.</p>	

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		<p>13.27 EY appreciate that these proposals will impact every aspect of the Department’s functioning and ability to deliver on its aims which is disappointing and worrying for the department, Arm’s length bodies (ALB), community and voluntary sector and wider society. In the time constraints due to the late publication of the budget and with pressured resources the department has published a broad EQIA of the full budget. However, an EQIA should be carried out at programme/policy level rather than for the budget as a whole. It is very difficult to comment on the impact of and propose mitigations with such a broad-brush approach. The lack of detail in terms of the cuts and impact to the community and voluntary sector and those it supports is particularly unsatisfactory and should be redressed.</p> <p>13.28 The EQIA states that “there may be impacts to Section 75 groups” due to withdrawal of funding support to Third Party Organisations. Without further detail, based on an analysis of specific, disaggregated data included in the EQIA, it is very difficult to comment on the particulars. Without consideration of this detailed information, it is also difficult to understand how the Department can fully undertake an exercise in mitigation. Age NI believes that if such funding cuts are levied on community and voluntary sector, the adverse impacts could be devastating; we note that the Department itself acknowledges in the EQIA that such funding withdrawal, “may lead to viability issues or closure of the bodies.” We are concerned that the cumulative effect of the proposed budget cuts across all departments will be devastating to individual lives and to the social fabric supposed by the community and voluntary sector across the region.</p>	

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		<p>13.29 As well as helping to delivering better outcomes, a stronger partnership approach with the sector may also have helped explore alternative actions and solutions that could have been taken to mitigate some of the proposed cuts within the Department EQIA.</p> <p>13.30 Social funding for community groups means helping the most marginalised groups access the services provided by DfC. This includes especially those in areas of multiple deprivation. The community sector helps DfC link to those who are most in need of their services but who often slip between the cracks of state provision. We advocate for actions that preserve the community infrastructure that helps DfC deliver to the poorest and most marginalised communities.</p> <p>13.31 The community support grant has also been identified as important to the Council in relation to the overall impact that it could have. The advice grant does require protecting particularly in the current climate of financial hardship. This is a procured contract, via Council, and the contribution is matched more than 50% by the rate and allows for general advice support to those most vulnerable. The further contribution to community support of £54,000 allows for an investment return on community activity and engagement of over £700,000 which is funded by Council. Whilst it may seem a small amount of funding it is important to allow Council to deliver its wider grants programme. This is a similar position with regard to the community festival grant, the contribution of £29,000 allows for an investment return and match contribution of over £150,000. A large percentage of this grant support is for Section 75 groups and activity, including women, race, religion, political opinion, disability, age, LGBTQ, and carers. Any reduction to this support will have a direct impact on these groups.</p>	

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		<p>13.32 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). This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p> <p>13.33 Social funding for community groups means helping the most marginalised groups access the services provided by DfC. This includes especially those in areas of multiple deprivation. The community sector helps DfC link to those who are most in need of their services but who often slip between the cracks of state provision. We advocate for actions that preserve the community infrastructure that helps DfC deliver to the poorest and most marginalised communities.</p> <p>13.34 Any reduction on service will have a detrimental impact on areas of deprivation. 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). This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p> <p>13.35 The Department has been very aware of and responsive to the particular needs of the Deaf and hearing-impaired community and the need for additional support to try to rebalance the marginalisation and discrimination faced by this community, it is therefore deeply concerning to learn about cuts and cost saving measures that are likely to stall that good work and cause further disadvantage. Any attempt to top slice budgets on an equal basis will have the effect of furthering disadvantage to the Deaf and hearing-impaired community. A reduction in resources is therefore likely to impact negatively. It is critical that this is taken into consideration when examining the impact of cuts in services and support. The Deaf and hearing-impaired community are at a disadvantage across all sectors due to the absence of appropriate</p>	

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		<p>linguistic infrastructures to support their inclusion and therefore are interfacing with and require the support of a wide range of services provided by the Department. It is of critical importance that consideration is given to maintaining and potentially increasing financial support to voluntary sector organisations who can step in and mitigate against the disadvantage created by cuts in direct services and those provided by arms-length bodies. The support of the voluntary sector during this time is essential in mitigating against further disadvantage and discrimination but also offers value for money. The cost of supporting increased initiatives in these organisations with existing infrastructure and networks will be more cost effective than the provision of adjusted support within the Departmental and arms' length bodies and therefore makes economic sense during this economically challenging times.</p> <p>13.36 Removal of these services is likely to lead to additional demand on health and social care services, as well as on the benefits system, not only by women themselves, but their wider families, as loss of these support systems impacts on women's capacity to manage families.</p> <p>13.37 One of the things that community sector does most effectively is enable and provide access to the essential services provided by DfC. The DfC is well aware of the evidence that many in the Section 75 groups and those living in the most deprived areas communities find it harder to access services and benefits and many can drop through the safety net. The community sector reaches those hard to reach. groups. Community groups are able to recognise the complexity and totality of people's experience and therefore play a critical role. The proposed cuts will severely reduce the capacity of the sector. The budget delays have already had an effect on the community sector's capacity, the most essential ingredient of which is staffing. These will cause long term unforeseen and unplanned effects.</p>	

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		<p>13.38 Child poverty in this area is running at 57% and further cuts will only impact negatively on children and young people. Community organisations that provide support to children and young people in neighbourhood renewal areas have already witnessed their incomes cut and their services diminished. Childcare providers in neighbourhood renewal areas have come under acute pressure as cost have risen by more than 20% and many are now eating into their small reserves to keep their doors open. Cliftonville Community Centre After schools' project runs 5 days a week and they have approximately 20 children each day from P1-P7 in our centre and each child gets a fruit snack, a yoghurt and toast/toasties. Youth drop-in over the winter months provides heat and food to children and young people coming from cold homes without a warm meal.</p> <p>13.39 The present government budgeting crisis has led many youth workers to look for alternative job opportunities. These youth workers are skilled, experienced and committed to working with young people in neighbourhood renewal areas. However, they can't make ends meet, or make commitment working in unstable funding environments. They are looking for more secure employment prospects outside the community sector.</p> <p>13.40 Workers employed under Neighbourhood Renewal Funding in Lenadoon and Suffolk Community Forums have worked together for more than ten years in helping to reduce sectarian and anti-social behaviour along the Interface and in the local Neighbourhood. Budget cuts to this work will have a significant and adverse impact on young people and it will also add future budgetary pressures to other section of the NI Government budget, especially Department of Justice, Department of Health.</p>	

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		<p>13.41 North Belfast Senior Citizens Forum (NBSCF) note that there is a growing problem of isolation and loneliness amongst older people. They are one of the few organisations addressing this problem in the North Belfast area. This impacts on health awareness, community safety and crime prevention. Rates of dementia are rising significantly across Northern Ireland, NBSCF initiated and helps co-ordinate Dementia Friendly North Belfast – a partnership making the area more dementia friendly and providing signposting and help for those people living with dementia.</p> <p>13.42 Any reduction in support to the neighbourhood renewal programme would target the most vulnerable at a time of hardship and would have a direct impact on section 75 religious and political background. Cuts in funding to these areas will likely lead to organisation closures and could lead to lives being lost.</p> <p>13.43 The current cost of living crisis means that the need for Neighbourhood Renewal is greater than ever. All the groups covered by equality legislation live within our most disadvantaged communities and face greater levels of inequality due to the dual effects of the proposed cuts in the Department’s funding and declining incomes. Addressing the immediate impacts of deprivation and implementing plans to tackle place-based poverty can only happen if there is the necessary collaborative infrastructure. For this reason, it is essential that the budget for Neighbourhood Renewal is maintained.</p> <p>13.44 Since the inception of the People and Place Strategy in 2003 Neighbourhood Renewal has been at the forefront of addressing place-based deprivation. This strategy has enabled a collaborative approach to tackle the multidimensional nature of deprivation and enabled people in the 10% most deprived wards of Northern Ireland to have a real voice in addressing both the causes and impacts of poverty. Neighbourhood Renewal has helped</p>	

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		<p>build strong community infrastructure and facilitated real partnerships across sectors in our most deprived areas. This has created a stable platform for addressing complex social and economic needs and enabled rapid community response in times of crisis. This was clearly demonstrated in the community's ability to act quickly, flexible and effectively to the COVID epidemic. Local organisations provided vital front line services in the form of food parcels delivered to people's doors, care packages and emotional support. current cost of living crisis means that the need for Neighbourhood Renewal is greater than ever. All the groups covered by equality legislation live within our most disadvantaged communities and face greater levels of inequality due to the dual effects of the proposed cuts in the Department's funding and declining incomes. Addressing the immediate impacts of deprivation and implementing plans to tackle place-based poverty can only happen if there is the necessary collaborative infrastructure. For this reason, it is essential that the budget for Neighbourhood Renewal is maintained.</p> <p>13.45 The Harryville Men's Shed is primarily made up of aged members of the community. With potential closure or reduced operational capacity there will be a detrimental impact on health and well-being to a group of people recognised under Section 75. They are to any male over 18 years old regardless of religion or creed. The cuts will impact on inter-community relationships as the Men's Shed is a safe space for people of all religions to come together. The pending cuts could reduce community cohesion and stifle the building of community relationships.</p> <p>13.46 There is widespread concern among NRA funded projects at the fact that there is currently no budget increase in line with legislative minimum wage uplifts on the contracts. Whilst we appreciate the full year's grant allocation in what are clearly challenging financial times, to be awarded a contract that doesn't meet the minimum wage increase poses major issues for staff who already feel undervalued and are struggling with low pay rates, and is placing</p>	

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		<p>organisations in potential breach of employment law. We would ask that the Dept please consider that the additional amounts required to meet minimum wage increases are added to the contracts immediately?</p> <p>13.47 DfC should retain the relatively small amount of funding allocated to Neighbourhood Renewal Areas. Reducing the amount of funding allocated to groups funded via DFC's NRA budget would have a severe detrimental impact on local communities and would be counter-productive as it would inevitably lead to a greater financial cost to other government depts such as health, policing, justice system, education, etc.</p> <p>A small preventative pot of funding for NRA will mean future budgets will not be under as much pressure to meet the inevitable need to be reactive to meet the obvious social needs that will prevail. Whilst this year's budget is of course forefront, it is also important to be cognisant of the many negative longer-term impacts that cutting NRA budgets will bring in the future.</p> <p>13.48 The focus of the work of the voluntary sector is often on early interventions and prevention and so cuts will have a bigger impact on the needs of vulnerable people and increase costs in future years. The cuts at present appear to be a short term response and they are not focused on longer terms solutions to chronic issues. There will also be a knock on impact to public services which are being supported by the sector. Groups impacted are likely to be children and young people, people on low incomes, older people, people with disabilities and people from LGBTQ+.</p> <p>Holding funding at 22/23 levels is still a real terms cut for organisations, who need a funding model which provides greater sustainability in the longer term and allows investment in the sector which delivers so much on behalf of vulnerable groups.</p>	

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		<p>The sector has suffered chronic underfunding over a long period. There is no fat left to cut so these proposed funding reductions will have a devastating impact on the sector.</p> <ul style="list-style-type: none"> • The voluntary and community sector delivers many services on behalf of government, often cheaper and more efficiently than government can deliver directly. • The sector is very good at using the core funding provided by government to leverage other funds and this wider funding is put at risk by these cuts. • In many cases these cuts represent a move away from long term policy positions supported by Ministers. 	
14	Discretionary Support	<p>14.1 The cost-of-living crisis has meant that the discretionary support grant applications have risen to unprecedented levels. The current demand has been forecasted at £40m in 2023-24 but the budget allocation is only £13.7m – just 34% of what is needed.</p> <p>14.2 Discretionary Support (DS) applicants who find themselves in extreme, exceptional or crisis circumstances which present a significant risk to their health, safety or well-being need to be able to rely on this scheme to escape destitution; and have less recourse to crisis support via the Discretionary Support Scheme as is in place in GB. For example, we understand that DWP has secured the necessary additional resources to deliver on the challenging ‘Move to UC’ agenda and the Chancellor has bolstered the GB Household Support Fund to the tune of an additional £1bn. DS Grants awards being scaled back which will not only put at risk the Department’s ability to help address the basic needs of people who present with hardship and in crisis,</p>	<p>With DfC facing a Resource funding gap of £111.2m (15.5%) in 2023-24, the Department acknowledges that managing a Resource pressure of this magnitude will undoubtedly impact on the Department’s ability to meet demand for public services in 2023-24.</p> <p>The Department received full funding for existing Welfare Mitigation in its 2023-24 Budget Settlement. This includes the funding for Universal Credit</p>

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		<p>but potentially impact on the ability of people affected by 'Move to UC' to claim a UC Contingency Fund grant. The Department should commit to ensuring that anyone who meets the requirements for a UC Contingency Fund grant are informed about, supported to apply (including referral to the independent advice network where necessary) and paid as appropriate under the Regulations.</p> <p>14.3 Discretionary Support grants can serve as an invaluable lifeline to households who may be on the edge of homelessness. With so many struggling to make ends meet, this cut will be hugely damaging to many of the poorest households living here. We would submit that this cut runs against the strategic shift we need to see towards preventing homelessness before it happens rather than reacting to it after the fact.</p> <p>14.4 Any cutting back of DS will undermine the Minister's decision to implement the recommendations from the DS Review and will plunge families into deepening crisis.</p> <p>14.5 Cuts will impact on those with dependents, with disabilities, migrant workers, different age-groups, men-women and religious/political beliefs. East Belfast has two areas, (Inner East and Tullycarnet) which are designated Neighbourhood Renewal areas and face high levels of deprivation. Reductions in Discretionary Support Grants will impact therefore more heavily on those with dependents, older people and people with a disability who in these areas are more likely to be disadvantaged.</p> <p>14.6 Cuts to the Discretionary Support Fund, potential delays to benefit payments and access to support via Departmental Offices which will impact on people with the lowest incomes and those most impacted by the cost-of-living crisis. Sinn Féin believe that people are entitled to a social security</p>	<p>Contingency Fund and for the Advice Sector to support those impacted by the Move to Universal Credit. People applying for Discretionary Support help while awaiting their first Universal Credit payment, including those transitioning under Move to UC will therefore not be affected.</p> <p>In considering allocation of the Department's constrained 2023-24 Budget careful consideration has been given to balancing priorities, need and available funding to maximise the supports the Department provides to those who need it most.</p> <p>The Department bid for funding in 2023-24 to implement New Mitigations (including recommendations from the DS Review). The Department received no funding for implementation of recommendations arising from the DS Review, in the absence of funding and pressures facing the Department in 2023-24,</p>

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		<p>system that is fit for purpose and that staff welfare and service provision should be at the highest standards possible. This involves having the necessary resources and IT to allow this to happen.</p> <p>14.7 We believe that resetting the Department’s budget towards a ‘historic baseline budget’ would have a significant impact on many who have already been significantly squeezed by inflationary pressures on essentials such as energy and food, which make up a much higher proportion of household expenditure for those on low or fixed income. As of March 2023, food inflation was running at 19.2%, the highest figure in 45 years, and significantly higher than the CPI figure for the same month of 10.1%. Whilst the rate of increase may well slow in the months ahead, this means that individuals and families will continue to be faced with rising costs for food, and other household essentials for the remainder of this financial year, and well beyond.</p> <p>14.8 The NIHRC is therefore deeply concerned by the cuts to the Discretionary Support Grants scheme. Individuals with the lowest incomes are most likely to need this contingency measure, in particular lone parents, families with children and households with disabled people. These grants act as a final safety net to those with limited financial resilience, it will therefore have a substantial impact to their ability to meet basic needs if this access is reduced. They reiterate the importance of examining the human rights implications of the reductions to Discretionary Support.</p> <p>14.9 Age NI agrees with the Department’s assertion that the proposed scaling back of Discretionary Support Grants will curtail its ability to address the “basic needs of people who present with hardships, particularly people with dependants, older people and people with a disability.” We believe that there will be a significant adverse impact caused to these groups, women and that</p>	<p>progressing this work is not affordable and will be a matter for an incoming Executive. It is anticipated a reduction in the DS budget will impact people across the section 75 groups.</p> <p>The Department has considering available data to better understand the likely impact and to identify any mitigating steps that may be taken.</p> <p>The Department has also conducted a DS specific EQIA to better understand the impact of the reductions and will review its approach in the Autumn including consideration at that time of findings of the specific DS EQIA</p> <p>The Department’s 2023-24 Budget will be targeted to ensure continued support for the Neighbourhood Renewal Programme.</p> <p>In considering allocation of the Department's constrained 2023-24 Budget careful consideration will be given to balancing</p>

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		<p>other Section 75 groups may also be affected. Given the current demand on DS Grants, due to the cost-of-living crisis, the impacts of scaling back of DS Grants for people facing, “extreme, exceptional or crisis circumstances which present a significant risk to the health, safety or well-being of the claimant or a member of the claimant’s family,” could be devastating: these grants can be the difference to someone being able to eat or heat their home. Again, however, no specific mitigation is offered.</p> <p>14.10 In 2021 DfC concluded a review of Discretionary Support and made recommendations which were accepted by the Minister. It was recognised that DS was a vital lifeline to families in immediate crisis. Any cutting back of that service will not only undermine the Ministers decision to implement the review recommendations but will plunge families into deepening crisis. Discretionary Support was increased to help deal with the pandemic and this needs to continue now to deal with the cost of living crisis. Any reduction on service will have a detrimental impact on areas of deprivation. 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). This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p> <p>14.11 The presumption is that the anticipated £40m was based on informed data which identified evidence need at this higher amount therefore we concur with the departments analysis of the hardship inflicted on section 75 groups as a result of any reduction to available.</p> <p>14.12 Any cutting back of that service will not only undermine the Ministers decision to implement the review recommendations but will plunge families into deepening crisis. Any reduction on service will have a detrimental impact on areas of deprivation.</p>	<p>priorities, need and available funding to maximise the supports the Department provides to those who need it most.</p> <p>The Department is committed to supporting those people facing the most difficult and challenging circumstances. As part of the implementation of a reduction in the DS budget the Department has sought to continue providing the same level of protection for people in specific circumstances, including those fleeing domestic violence.</p> <p>The Department will continue to meet all statutory obligations on the delivery of social security benefits and other financial assistance to those people most in need.</p>

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		<p>14.13 The proposed cuts to Discretionary Support are hugely concerning impacting on some of the most vulnerable in our society and will undoubtedly disproportionately impact equality groups under section 75, including women, who are more often on lower incomes and more likely to be in debt or to borrow.</p> <p>14.14 "Cuts to Discretionary Support may mean that people can't afford to buy the food or heat they need which may cause them to become physically or mentally ill which could impact on the health service and cuts to Supporting People may have implications for women escaping domestic violence situations if they are unable to access the accommodation they need which has implications for the forthcoming Violence Against Women and Girls Strategy. Taking a silo approach to these cuts by individual Departments is further contributing to the problem.</p> <p>14.15 We draw the Department's attention to the legal consequences of cuts to discretionary support (DS) which we see as constituting a risk to the rights under Article 3 (right to protection from inhuman and degrading treatment) and Article 8 (right to family life) of the European Convention on Human Rights (ECHR) for people claiming UC for the first time. DfC has already recognised the risk of destitution associated with a new UC claim and partly mitigated it through the UC contingency fund (UCCF) payment, delivered through DS. Any cut to the DS budget will impact on the funds available for this payment, restoring the risk that the UCCF payment is designed to off-set. Northern Ireland has been relatively well served by DfC's actions in introducing the crisis support currently available through the DS scheme. This includes the UC contingency fund, which has not been without its shortcomings. The recent DfC commissioned reviews of DS and welfare mitigations recommended additional investment in discretionary support</p>	<p>Universal Credit Contingency Fund grants will continue as normal - assisting all those eligible while awaiting their first Universal Credit payment. The Department will ensure all decisions are in line with the Northern Ireland (Interim Arrangements) Act, which received Royal Assent on 24 May 2023.</p> <p>The 2023-24 Budget Settlement presents significant challenges for all NICS Departments to manage the forecasted level of pressures in 2023-24. The Department acknowledges the impacts budget cuts will have on vulnerable people and Section 75 groups.</p> <p>It is anticipated a reduction in the DS budget will impact people across the section 75 groups. The Department has considered available data to better understand the likely impact and has taken steps to mitigate the impact on Section 75 groups.</p>

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		<p>grants and the contingency fund, but the consultation document clearly envisages the opposite direction of travel for 2023-24. This appears to be at odds with the direction that the Minister was considering in commissioning a review on how the DS scheme in particular could be improved. The EQIA notes that the projected demand for 2023/2024 is in the region of £40 million. If the DS budget prioritises loans, it should be noted that these cannot fully compensate for reduced availability of grants as the poorest applicants are less likely to be deemed capable of making repayments. A DS budget cut that results in the Department having to curtail benefits means DS will be unable to meet the need for crisis or emergency support. This is where the possibility that ECHR rights will be breached arises. We strongly recommend that the maximum possible resources are devoted to DS, including the UC contingency fund, at this time, and that additional funds are allocated in-year if this proves necessary.</p> <p>14.16 SVP have found that a great majority of the clients we have supported during the five-week wait for UC have not been made aware of the UC Contingency Fund. Until March 2018, the NI Audit Office reported that only 115 grants were awarded, totalling £17,000. SVP recommends that the Department for Communities should do more to increase awareness of the Contingency Fund and consider making an automatic Contingency Fund payment to those who are considered to be at risk of destitution.</p> <p>14.17 Any reduction on service will have a detrimental impact on areas of deprivation. Multiple Cuts from all departments will impact on those most vulnerable in society including the communities that reside in Areas of Multiple Deprivation.</p> <p>14.18 "Whilst the Council recognise the need to operate within budgetary constraints, the scaling back of the discretionary support grants scheme –</p>	

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		<p>during a cost-of-living crisis – will inevitably impact on those individuals and families most in need. The programme provides essential and time critical support and any scaling back of this grant should be limited as it will put at risk the ability to help address the basic needs of people who present with hardship, particularly people with dependents, older people and people with a disability."</p> <p>14.19 Any cuts to the DfC Discretionary Support fund would impact on many people with a learning disability, who would be further impoverished as a result.</p> <p>14.20 The presumption is that the anticipated £40m was based on informed data which identified evidence need at this higher amount therefore we concur with the departments analysis of the hardship inflicted on section 75 groups as a result of any reduction to available.</p> <p>14.21 Any cutting back of that service will not only undermine the Ministers decision to implement the review recommendations but will plunge families into deepening crisis. Women are more likely to claim Discretionary Support and therefore would experience a greater adverse impact if the cuts to Discretionary Support proposed in this EQIA go ahead.</p> <p>14.22 Discretionary Support was increased to help deal with the pandemic and this needs to continue now to deal with the cost-of-living crisis. DS should be prioritised as the crisis support system. This is critical to the state's obligations in upholding fundamental rights.</p> <p>14.23 Recommend that UC Contingency Fund is protected given impending migration to UC. Recommend that any proposed changes to existing</p>	

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		<p>policy/eligibility criteria for DS are considered in light of guidance from SoS to Departments re decision making.</p> <p>14.24 Cuts to or the reduction in rates of DS disproportionately impact on disabled people who more likely to be on lower incomes and more likely to live in poverty.</p> <p>14.25 In 2021 DfC concluded a review of Discretionary Support and made recommendations which were accepted by the Minister. It was recognised that DS was a vital lifeline to families in immediate crisis. Any cutting back of that service will not only undermine the Ministers decision to implement the review recommendations but will plunge families into deepening crisis.</p> <p>14.26 The Independent Review of the Discretionary Support Scheme provides administrative and well as budgetary related recommendations that can be enacted, including better targeting of support to households headed by one parent and larger families, as well as administrative changes that can speed up processing times. Publishing the decision-making process for the DSS scheme and providing all decisions in writing would assist in providing clarity to households in need and reduce some of the stress for those accessing state supports.</p> <p>14.27 It is also worth highlighting that cuts like the proposed cut to Discretionary Support Grants, cuts to support for disabled people and the housing cuts are all in the context of the ongoing inadequacy of the universal credit system. Responses such as the DS Grant system are crucial and we do not believe the cut to this funding is sustainable.</p>	

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	<p>14.28 Discretionary Support (DS) Grants - Reducing the number of times an individual can apply for a DS grant may be unavoidable considering the budget constraints. However, it is important that special consideration be given to those people living with disabilities or caring for those with disabilities as pressures on running medical equipment etc, especially in a cost of living crisis, may put a huge strain on the household budget.</p> <p>14.29 In order to reduce costs, it is recommended that Discretionary Support Grants are awarded for emergencies only. While NI Direct state these are only for emergencies, in reality, they are not being used this way.</p> <p>14.30 The Discretionary Support Grants system could be abolished to save much needed funding, with interest-free loans being granted to vulnerable people in crisis situations instead. People in employment, by contrast, often have to avail of high-interest loans for white goods.</p> <p>14.31 There is also concern around potential abuse of the DS Grants system, with the potential for claimants to re-claim for the same item every 12 months without any checks being carried out to confirm the current item is faulty.</p> <p>14.32 In the experience of SVP, while some individuals and families are successful in securing a grant from the DS Scheme, many are not eligible as they have already received a grant or they have existing debt with the DSS. We are concerned the removal of support through the scheme will lead to further hardship for low-income households and greater demands on SVP. For example, many people moving into new accommodation, which is totally unfurnished, have been turned down for DS Support and have turned to the services of doorstep lenders or payday lenders leading to further financial distress for households.</p>	

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		<p>14.33 Under-provision of housing stock means that many families have to rent from private landlords, which inevitably results in a shortfall between Housing Benefit provision and the actual cost of the rent. In order to keep a roof over their heads, people have to use inadequate benefit provision where they may be already paying off a loan to Government, to make up the shortfall in the rent. The discretionary hardship provision is vital for these people to keep a roof over their heads. To lose this provision would be unsustainable for such families and individuals and result to homelessness due to evictions. In SVP's view the limit on one grant per year and a loan system for those with short term needs is at odds with the discretionary nature of the scheme and the aim of alleviating unexpected hardship.</p>	
15	Other Capital	<p>15.1 Council is concerned at the decrease in the Department Net Capital budget given the priority investment projects which haven't come forward in Belfast in recent years. Council is concerned that the current in year capital financing is prohibiting the growth of the city and indeed the region.</p> <p>15.2 Investment in existing buildings and infrastructure is likely to be a more cost-effective capital response and will also ensure an equal playing field for well-established organisations with an existing base. The deaf community are familiar with these facilities and have an affinity to them and therefore are more likely to utilise them than a new, unfamiliar building. However, it is vital that these spaces are maintained as safe, attractive, accessible services which act as a hub for the community to socialise and learn together enabling the establishment of effective peer support, minimising isolation, and promoting a sense of community and belonging. The return on any capital investment by the Department in such services and facilities is likely to generate significant long-term benefits in terms of the achievement of governmental and departmental goals around inclusion and equality. Whilst it is understandable in the current financial climate that cost saving measures</p>	<p>The Department has considered the points raised when prioritising its Final Capital budget allocations for 2023-24.</p>

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		<p>need to be introduced it is disappointing to learn the extent of those cuts and the plans to implement them.</p> <p>15.3 Additional support for projects with massive potential to enhance local employment and support physical wellbeing (i.e. Casement Park).</p> <p>15.4 Reductions in capital allocations are highlighted in the DfC consultation. The consultation doesn't specify any cuts to the third sector i.e. neighbourhood regeneration but this will be badly affected by inflation et c without the allocations actually increasing It is likely that pressure will increase on councils to supplement the third sector as a result of this attrition.</p> <p>15.5 There is deep concern within our area and across all NRA's at the decrease in the Department Net Capital budget given the priority investment projects, which have not come forward in Belfast in recent years. We are concerned that the current in year capital financing is prohibiting the growth of the city and indeed the region. We are keen for Council to explore with the Department and other Executive departments, innovative approaches to funding capital projects, including seeking external funding streams and the potential to develop an Investment Fund that could attract in-year funding to deliver longer term strategic priorities, there are a few city-wide projects that would benefit from a more strategic and stable approach to funding.</p>	
16	Other / General Budget	<p>16.1 NICVA are concerned about the impact that the DfC proposed budget cuts will have on specific groups: those with disabilities; young people leaving care; the increasing number of young people presenting as homeless; households in rural areas; those living in poverty; older people, women, and ethnic minorities.</p>	<p>The Department recognises that the closure of the Affordable Warmth Scheme will have a severe impact especially given current high fuel prices. The Department has therefore announced action to protect the</p>

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		<p>16.2 We appreciate that the DfC had to act fast and respond to the NI SoS emergency budget announcement in April however the EQIA cites several sources of evidence without providing clear rationale for how that evidence has informed the subsequent proposals (step 2 in EQIA guidance). In addition, the data is not disaggregated to demonstrate specific impact on the section 75 groups such as women or those with disabilities.</p> <p>16.3 We would call on the Department to publish their Stage 7 EQIA Report which will show how they have taken the consultation responses into consideration in order for the sector to have clarity on the decision-making process.</p> <p>16.4 One of the biggest flaws in the EQIA is the siloed approach wherein each department only considers its own areas of work and doesn't consider the effect of proposed actions on the activities of other departments. Advocate for immediate action to take a cross departmental comprehensive approach which examines the cumulative and overarching effects of cuts from all the departments.</p> <p>16.5 The cuts to funding being contemplated—including to the Supporting People Programme; third party organisations providing community and voluntary networks; Arm's Length Bodies providing tailored support; and the Affordable Warmth Scheme—would disproportionately hit older citizens. As older people are less likely to be in paid employment, experience higher levels of poverty and endure increased levels of serious long term health conditions, such cuts would represent an unfair burden on this section of society.^{1 2} Therefore, it is vital that everything should be done to avoid the harm inherent in the cuts outlined in the EQIA.</p>	<p>Affordable Warmth Scheme which will enable it to remain open this financial year. This has been achieved by removing targeting from the scheme and closing the Boiler Replacement Scheme, which will reduce the administration costs of the Scheme and augment the budget.</p>

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		<p>16.6 Programmes to tackle poverty and disadvantage. These programmes are critical to support families on low incomes to meet the basic material needs of children through maximising incomes from benefits and employment. While some of these general areas of responsibility were referred to in the EQIA, there were no specific references to these programmes, and it is unclear how they will be affected – adversely or not - by the cuts to the DfC budget.</p> <p>16.7 The Equality Commission advises the Department to include a summary of the actual data used from the named sources in its Stage 7 EQIA report and assessment of potential impacts on the Section 75 categories.</p> <p>16.8 The EQIA references the reallocation of any additional funding that may become available in-year, however it is unclear whether there has been any current consideration given to mitigating adverse equality impacts of the proposals by redistribution of internal budgets. Reallocation of funding in year may be of little help to organisations impacted by DfC funding cuts who may have to reduce or stop services, make staff redundant etc. in the interim period.</p> <p>16.9 The Department has not included how it proposes to monitor the impact of budget decisions on Section 75 groups. Rather, it commits to taking account of ‘adverse impacts...identified through this assessment process’ to inform 2023-2024 budget allocations and using its findings to inform further mitigations, revised budget allocations and in-year bids.</p> <p>16.10 Age NI is deeply concerned about the significant adverse impacts of these decisions on older people and others, including those who are at risk of or are living in poverty; who are experiencing social exclusion, material deprivation and disadvantage; prejudice and discrimination, and unable to</p>	

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		<p>benefit from or participate fully in the life of their community. We believe the Department should provide more detail regarding the adverse impacts on older people and other Section 75 groups, which arise from each proposed cut, along with mitigating measures.</p> <p>16.11 It is recommended that the Department for Communities undertake a Rural Needs Impact Assessment to set out the impact of the budget proposals, and how it proposes to mitigate this impact, upon people living in rural areas.</p> <p>In relation to this consultation Mid Ulster District Council believe that the Department has failed to demonstrate that due regard has been paid to the Rural Needs Act 2016. The cuts clearly have a significant impact on rural areas; however, the relevant Rural Needs Impact Assessment information has not accompanied this consultation and as such the influence of rural needs requirements are not reflected in the significantly reduced budgetary provisions. In addition, in the absence of a documented assessment, no rural needs mitigations have been made available in relation to these proposals. DAERA, who oversee the implementation of the Act are clear that Rural Needs Impact Assessment should not be completed retrospectively. Therefore, any assessment that follows this consultation period is not useful because the time for its influence on decision making will have already passed.</p> <p>16.12 Any proposed cuts to support services will have a direct impact on the LGBTQIA+ community, due to their lived experience and the intersectionality of that experiences. The evidence presented to Department via the expert panel report on LGBTQI+ Strategy has shown that this community experience higher levels of hate crime, discrimination, violence and inequality than others in Northern Ireland.</p>	

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		<p>16.13 The Departmental Budget has been well thought through in terms of the taking appropriate steps to not negatively impact on the support it provides vulnerable and marginalised sections of our community through the work of community-based organisations.</p> <p>The primary function of government is to look after its citizens well-being. The Department should re-examine its non-discretionary budget (statutory, legal and contractual commitments) in order to free up further funding to support the most vulnerable.</p> <p>16.14 There is some doubt over whether the consultation process will have any impact on the outcome of the decisions the Department will make, with suggestions that these decisions have already been made.</p> <p>16.15 The NI Civil Service should refuse to implement cuts in the absence of the NI Executive.</p> <p>16.16 MLAs wages should be cut to the living wage, as the Executive and Assembly is not currently running. Stormont should be reformed to prevent the current situation being repeated, as it is a waste of money.</p> <p>16.17 The engagement and consultation with Departments regarding the 2023/24 budget is welcome, however it is recommended that this continues throughout the year in parallel with the monitoring rounds. This will ensure that arising considerations, for particular groups within S75 are highlighted and reviewed to ensure equity of spend is monitored.</p> <p>16.18 Clarification is sought that the Department has taken account of section 28E of 1998 Act when considering proposed cuts or changes to services.</p>	

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	<p>16.19 Mid Ulster District Council has serious concerns in relation to the cross-cutting impacts of a number of the proposed budget cuts. The ending of the European Social Funding as a result of Brexit, and without a replacement leaves a gap in funding for numerous organisations and the proposed cuts to arm’s length bodies’ budgets, given the breadth of work under the remit of DfC will have a hugely negative impact across Section 75 groupings. Many organisations impacted upon have already streamlined their services due to austerity measures. This proposal could therefore result in cuts to services, loss of employment, and potentially a loss of expertise and knowledge that could take many years to regain.</p> <p>16.20 I personally would like to express as a budding organist, the utter disregard our government have in supporting the upkeep of the national treasures that are the cathedral and church pipe organs throughout Northern Ireland is a laughingstock throughout the world. These pipe organs are each worth millions of pounds and have the capacity to inspire and lift the spirits of the thousands of people who routinely hear them. It is such a shame to see these marvels of engineering from years past and present being left to rot and decay. My own local Newry Cathedral has a 3 manual Telford pipe organ dating back over 110 years, which is in such a state of disrepair that it is barely playable, and only fractionally functional. Please. Please. Provide grants for the upkeep and restoration of these fine instruments.</p> <p>16.21 We note that the Department states in the EQIA that in assessing the impact of the Budget 2023-24 policy against obligations under Section 75 of the Northern Ireland Act 1998, there is evidence of significant and adverse impact in respect of some Section 75 categories. However, the Department has not provided the evidence used in making these assessments within the published EQIA itself. This makes commenting on the evidence used, the groups impacted, and the nature of the impacts identified very challenging.</p>	

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		<p>We would request that DfC publish the data relied upon in making its assessment of impacts.</p> <p>16.22 In general terms, we are concerned that in identifying the impacts that the reduced 2023 - 24 budget will have on section 75 groups, the Department does not appear to have considered the impact of proposed cuts to workers in bodies like Libraries NI, or workers in community and voluntary sector organisations delivering services funded by the Department or its ALBs.</p> <p>16.23 UNISON is 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. However, whilst we note that some mitigating measures are outlined within the EQIA, we are concerned at the lack of mitigating measures proposed for some particular policy areas that will be impacted by the 2023 – 24 budget. It is difficult for consultees and stakeholders to identify possible mitigating measures or alternative policies in the absence of a detailed budget and costed alternatives. It is particularly worrying that there is a lack of detail provided about what mitigations may be considered to limit and minimise the adverse impact that any cuts to the Supporting People Programme will have on the Section 75 groups identified as accessing support from the programme. We further note that no mitigating measures are identified with regards to the proposed 5% cut in the Libraries NI budget. No alternative policies or mitigating measures are proposed with regards to those areas that the Department sought additional funding to take forwards, including in relation to the two-child limit, and replacement funding for ESF.</p>	

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		<p>16.24 The consultation document notes that the Department continues to work with its Arm’s Length Bodies to understand the impact of the budget outcome on service delivery, the potential impact of the policy on section 75 groups and how impacts could be mitigated. The Department should also be working with UNISON and trade unions representing affected workers across the public and community and voluntary sectors, particularly within Supporting People providers and Libraries NI. We note the reference within the consultation document to how, in the absence of an Executive and a Minister, some of the decisions required to live within the 2023-24 Budget allocation will fall to the Department’s Permanent Secretary under the now Northern Ireland (Interim Arrangements) Act 2023. The EQIA notes however that some decisions may be outside the scope of the Act and cannot be taken civil servants. Given the scale of the cuts proposed here and the wide range of policies and programmes that will be adversely affected, DfC should move quickly to clarify the powers of Permanent Secretaries to make decisions in the absence of Ministers. It is extremely regrettable that this budget does not allow for matters of previously established Ministerial and Executive priority to be progressed, including new welfare mitigations, a Supporting People provider uplift, replacement ESF funding and more ambitious rates of housing construction.</p> <p>16.25 In consulting on this EQIA, DfC stated that views received within the initial 4-week period will be used to inform the Department’s allocation of funds to its business areas and ALBs as well as any early mitigations that can be put in place. Any responses received between weeks 5 and 12 of this consultation will be used to consider further mitigation measures, to inform in-year budget reallocation processes, and to direct any additional funding (or further reductions) that emerge over the course of the financial year. UNISON notes that this approach deviates from the commitments made in the DfC Equality Scheme with regards to consultation. It provides that</p>	

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		<p>consultation lasts for a minimum of twelve weeks to allow adequate time for groups to consult amongst themselves as part of the process of forming a view. As the Equality Commission highlight in its response to the EQIA, these consultation timelines are shorter than those set out in DfC's equality scheme and the Department should record its rationale for deviation from scheme commitments.</p> <p>16.26 Age NI believes the Department should provide a full assessment regarding the adverse impacts on older people which arise from each proposal, along with specific mitigating measures. Age NI is concerned about the short-term nature of the proposals, particularly in the area of strategy development and implementation, and the longer term adverse impacts this will have on supporting the most vulnerable people, including older people, in our society. Age NI is concerned, too, about the cumulative impact of the budget proposals outlined by this Department and other Departments, on older people and the voluntary and community sectors. We urge the Department to work with other Departments and Arms Length Bodies to identify the cumulative impact and mitigating measures which may reduce or remove these cumulative impacts.</p> <p>16.27 The suggested timeframe for responding to the EQIA 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's equality duties. This is concerning given the significant detrimental impacts its proposals pose on many vital areas of public life and services such as housing support, and access to welfare benefits; employment related support; the arts and sports.</p> <p>NICVA would argue that the timescale for responses to this EQIA is insufficient. Approaching a sector that is already working on short term 3-</p>	

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		<p>month contracts amidst growing pressures and post covid exhaustion, and requesting a meaningful response in a short window of time is unacceptable.</p> <p>16.28 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.</p>	
17	Welfare Mitigations	<p>17.1 Cause for concern that no funding has been allocated towards new Welfare Mitigations.</p> <p>17.2 In this EQIA children and young people under 18 are not considered under the 'age' category. It is only under the category 'People with or without dependents' that children are mentioned in relation to childcare, and in the 'Religious Belief' category that the impact of not mitigating the Two-Child Limit is considered. The EQIA did not, however, provide a detailed list of these important interventions, or indicate whether it was proposed to continue their funding. NICCY has identified 28 programmes funded from the DfC DEL funding, largely drawn from the Delivery Plan for the Children and Young People Strategy 2020-2030, although this list is likely to be incomplete. If any of these are cut, this would have a detrimental impact on children and young people, particularly disadvantaged and vulnerable children and young people.</p> <p>17.3 We are firmly of the belief that strengthening the mitigations package is essential to provide protection especially relating to women from financial hardship and poverty and also to help with economic recovery.</p>	<p>The Department's bid for funding to support New Welfare Mitigations was not met in 2023-24.</p> <p>In the absence of funding and pressures facing the Department in 2023-24, progressing this work is not affordable and will be a matter for an incoming Executive.</p>

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		<p>17.4 Women will experience greater adverse impacts due to a lack of funding to take forward new welfare mitigations.</p> <p>17.5 The Department for Communities’ recent review of Welfare Mitigations emphasised the need for further mitigations to offset the impact of these changes and to tackle poverty and inequality, particularly in light of the rising cost of living. Therefore, the NIHRC is concerned that the bid for funding to support a new mitigation package was not met within the current settlement. There is significant evidence that the recent changes to social security are having a disproportionate impact on individuals and groups already marginalised or struggling financially. The NIHRC recommends that the Department for Communities takes targeted measures to ensure the impact of the delayed introduction of New Welfare Mitigations does not have a sustained impact on the right to an adequate standard of living for vulnerable individuals and groups, in particular women, carers, people with dependents, people with disabilities, and children.</p> <p>17.6 A specific new welfare mitigation proposed by the Independent Panel of the Welfare Mitigations Review (2022), the Cliff Edge Coalition and the Children’s Social Care Services Review (2023) is to mitigate the two-child limit. UNISON has consistently opposed the two-child limit, a policy that disproportionately impacts women, who form the majority of primary carers for children in Northern Ireland. Failure to introduce a policy to mitigate against the two-child limit would therefore disproportionately harm women and negatively impact children across Northern Ireland. The Expert Advisory Panel appointed by the Minister for Communities in 2020 to make recommendations on a NI Executive Anti-Poverty Strategy estimated that in April 2020 there were 21,350 children living in households subject to the two-child limit in Northern Ireland by virtue of their receipt of Child Tax Credit. A</p>	

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		<p>further 8,050 children were affected by the two-child limit imposed through Universal Credit. The Independent Panel and the Cliff Edge Coalition has also recommended increasing the Universal Credit Contingency Fund budget for paying grants during the five-week wait and introducing new guidance to enable payments to be more readily made under the Fund. Another mitigation recommended by both the Independent Panel and Cliff Edge Coalition is the introduction of a financial inclusion service to provide support to private renters affected by the Local Housing Allowance freeze. The inability to fund new welfare mitigations or payments in this budget will, therefore, have major adverse impacts across a range of section 75 groups.</p> <p>17.7 The Budget allocation appears to effectively rule out implementation in the current financial year of any of the additional mitigations recommended by the independent review. This means that opportunities will be lost to improve the financial circumstances of people in various section 75 protected groups by addressing Universal Credit five week wait, the two-child limit, and cuts to housing benefits in the private rented sector.</p>	
18	NDNA programmes / Executive priorities	18.1 Cuts to Executive/NDNA commitments will disproportionately impact on disabled people due to increased risk of poverty and continued absence of disability strategy	The Department bid for funding in 2023-24 to implement the Executive's New Decade New Deal (NDNA) commitments. The Department received no funding for implementation of NDNA commitments, in the absence of funding and pressures facing the Department in 2023-24, progressing this work is not affordable and will be a matter for an incoming Executive.

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