



Department for

**Communities**

An Roinn

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**Commonities**

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# Draft Budget 2021-22 Consultation Outcome Report

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March 2021

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# 1. About this document

- 1.1. This document presents the findings from the consultation on the Department for Communities proposed Draft Budget 2021-22 allocations.

## 2. Background

- 2.1. The process of setting Budgets can in some cases have an unintentionally greater impact on some specific Section 75 groups than others, for example, on males, females, young people or pensioners, etc. In allocating Budgets the Department aims to avoid any adverse impacts and where possible, action will be taken to mitigate against specific adverse impacts.
- 2.2. To comply with its Section 75 obligations, the Department for Communities (hereinafter referred to as ‘the Department’) following Equality Screening carried out an EQIA on the Executive’s proposed Draft Budget 2021-22 allocation to the Department.
- 2.3. The Executive’s Draft Budget 2021-22 was announced by the Finance Minister on 18 January 2021. The Draft Budget provides the proposed Resource and Capital investment funding allocations to departments for the 2021-22 financial year.
- 2.4. To allow Ministers time to make decisions on their own Department’s priorities, the Draft Budget 2021-22 proposed allocations are presented at an overall departmental outcome level. The announcement of the draft Budget triggered the commencement of a Department of Finance (DoF) led public consultation on the Draft Budget which closed on 25 February 2021. A copy of the Executive’s Draft Budget 2021-22 can be accessed on the Budget website: **<https://www.finance-ni.gov.uk/publications/2021-22-draft-budget>**
- 2.5. In line with Finance Minister’s announcement of the Draft Budget 2021-22, departments were required to screen proposed funding allocations

in line with equality commission guidance and if an EQIA was required, this was to be published to support the consultation process.

- 2.6. The public consultation period on the Department's draft Budget 2021-22 allocations ran concurrently with the public consultation on the Executive's Draft Budget. The Department's Final EQIA has been provided to the Department of Finance, to support the Executive as part of the decision-making process on the final budget.
- 2.7. This report has been produced to highlight the comments received during the consultation period and to outline the Department's next steps.
- 2.8. The Department would like to take this opportunity to thank all those who participated in the consultation. Your invaluable input and expertise will help to inform and shape both the Executive's Final Budget 2021-22 allocations to departments and the Department's Budget 2021-22 allocations.

## 3. Consultation

- 3.1. The Department's Draft Budget 2021-22 EQIA issued for consultation on 27 January 2021 and ran for a 4 week period, closing on 25 February 2021. All those recorded in the Department's Section 75 consultation list received a letter or email notification informing them of the consultation arrangements.
- 3.3. A full copy of the Department's Draft Budget 2021-22 EQIA can be accessed on the Department's website:

**<https://www.communities-ni.gov.uk/consultations/equality-impact-assessment-draft-dfc-budget-2021-2022>**

- 3.2. The consultation document was made available on the Department's website and promoted on social media through the DfC Twitter page. The documents were also available in hard copy or in different formats including Easy Read, large print or translated copies for accessibility.

The consultation document contained a response template asking consultees four main questions:

1. Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 5 of the EQIA consultation document? If so, what are they? Please provide details?

2. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in section 6 of the EQIA Consultation document? If so, what are they?
3. Please state what action you think could be taken to reduce or eliminate any adverse impacts in allocation of the Department's draft budget?
4. Are there any other comments you would like to make in regard to this pro forma or the consultation process generally?

## 4. Responses Received

- 4.1. A total of 72 responses were received. This included 26 online survey responses (11 from organisations and 15 from private individuals), 46 email responses (44 from organisations and 2 from private individuals). No postal responses were received.
- 4.2. Details of the 55 organisations responding include:
  - Advice NI
  - Antrim & Newtownabbey Borough Council
  - Ballynafeigh Community Development Association
  - British Association of Social Workers NI
  - Cliff Edge Coalition NI
  - Commissioner for Older People NI
  - Community Advice Antrim & Newtownabbey
  - Community Advice Armagh, Banbridge & Craigavon
  - Community Advice Banbridge
  - Community Advice Causeway
  - Community Advice Fermanagh
  - Community Advice Lisburn & Castlereagh
  - Conradh na Gaeilge
  - Council for the Homeless NI
  - Derry City & Strabane District Council
  - Disability Action
  - Dove House Community Trust

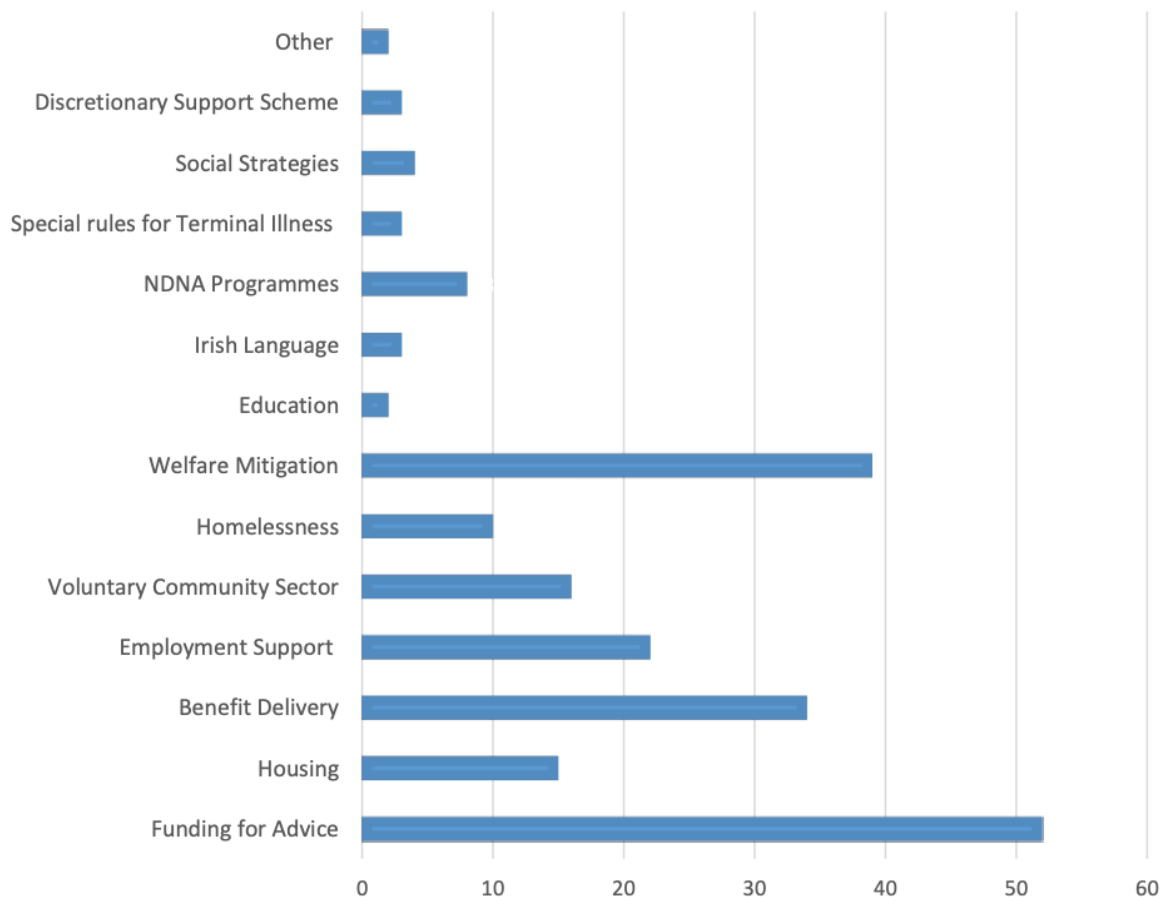
- East Belfast Independent Advice Centre
- Equality Coalition
- Equality Commission NI
- Fermanagh & Omagh District Council
- Foras Na Gaeilge (2 separate responses received)
- Housing Rights
- Human Rights Commission
- Irish Football Association
- Libraries NI
- Ligoniel Improvement Association
- Linen Hall Library
- Lisburn credit union
- Marie Curie
- Mid & East Antrim Borough Council
- Mid & East Antrim Community Advice Services
- Mid-Ulster Group of the MS Society
- Migrant Centre NI
- National Deaf Children's Society NI
- NI Women's Budget Group
- NI Women's European Platform
- NICCY
- NIPSA Northern Ireland Public Service Alliance
- NIVCA
- North Belfast Advice Partnership
- Northern Ireland Union of Supported Employment
- Omagh Independent Advice Services
- Participation and the Practice of Rights
- People Before Profit
- Royal National Institute of Blind People NI
- SDLP
- Shelter Campaign for Homeless People NI
- South City Resource and Development Centre
- STEP NI
- The Regional Palliative Medicine Group NI
- Women's Policy Group NI
- Women's Aid
- Women's Regional Consortium

## 5. Budget 2021-22 Consultation Response Summary

5.1. As the Department's Draft Budget 2021-22 allocation spans the diverse functions of the Department, respondents had differing priorities with a wide range of views expressed. The views of respondents have been summarised into 14 key themes.

5.2. The graph below summarises the numbers of concerns raised by respondents under each theme.

**Graph 1: Summary of EQIA respondent concerns by theme**





- 5.3. All consultation responses and feedback received has been analysed with the key issues being summarised and presented with the Department's response at Appendix A.
- 5.4. For the most part respondents agreed with the inequalities identified and the Section 75 categories affected in the draft EQIA. The consultation responses received were useful in highlighting three further Section 75 Groups potentially impacted by the Department's Draft Budget allocations and the Department's Draft EQIA has been amended to include these groups.
- 5.5. Following consultation, the Department's Draft Budget 2021-22 allocation is considered as having potential for adverse impact on the following Section 75 Groups:
- i. people of different ages;
  - ii. men and women generally;
  - iii. people with or without a disability;
  - iv. people with or without dependants;
  - v. people with different sexual orientations;
  - vi. people with different religious beliefs; and
  - vii. people from different racial groups.
- 5.6. Following amendment, the Department's Final EQIA has been shared with the Department of Finance and will be taken into consideration by the Executive in determining Final Budget 2021-22 allocations to departments.

## 6. Next Steps

- 6.1. The Department will seek to ensure that its 2021-22 budget allocations are applied as far as possible in a manner that does not disproportionately or adversely affect one Section 75 category, over another.
- 6.2. The impact of the Executive's Draft Budget 2021-22 on the Department is challenging with the Department facing a constrained financial position in 2021-22. In the context of delivering public services with constrained allocations, the Department is urgently considering options to live within its 2021-22

allocation whilst continuing to maintain effective public service delivery. These options include not filling staff vacancies and considering how efficiencies can be realised across the Department, its ALBs and programmes of work. This will be challenging given over 92% of the Department's Resource budget is required to meet protected, contractual, inescapable and statutory obligations.

- 6.3. In developing options to live within the proposed 2021-22 budget allocation, consideration will be given to how any adverse impacts on Section 75 groups can be reduced. It will however be difficult to mitigate the potential adverse impacts anticipated, given the scale of additional funding the Department requires in 2021-22.

- 6.4. The Department will consider the need for any further mitigating actions in light of responses received during the consultation. Promotion of equality of opportunity and the protection of services to vulnerable groups will be a key consideration in the Department's final Budget allocation decisions.

- 6.5. In advance of Executive agreement on the Final Budget 2021-22 allocations the Department continues to consider and develop plans to ensure the Department can continue to deliver services in 2021-22. These plans will be published on the Departmental website. Further consultations and equality screening will be considered, as appropriate, as plans to live within the Final Budget 2021-22 allocation are considered.

# Appendix A

## Draft Budget 2021-22 EQIA Consultation Response Summary

### Theme 1: Advice Sector

**Summary Comment / Points Raised:**

- 1.1 The Department's prioritisation of funding needs to reflect the importance of the advice sector. Advice Sector funding should be reinstated by uplifting the overall Department for Communities 2021/22 budget with no impacts on other important areas of the Department's work.

**Summary Comment / Points Raised:**

- 1.2 Given the impact of austerity/welfare reform, the complexity of the benefits system, the impact of Covid-19 and issues around poor financial literacy and capability there has never been a greater need for access to independent advice.
- The £1.5m cut to independent advice is alarming. Independent expert advice to support people through the social security process is crucial. We welcome the Minister's commitment to ensure people will not be denied access to advice support services. Failure to do so will have a particular impact on

**Response:**

The Department recognises the importance of continued advice sector funding. The Department bid for the funding required to support the advice sector in 2021/22. Subject to the Executive's Final Budget allocation, the Department's 2021/22 budget will be targeted to ensure continued support for the advice sector.

**Response:**

The Department recognises the complexity of the benefit system and is fully supportive of continuing advice sector funding in 2021/22.

women who are more likely to be social security claimants than men.

As we emerge from the Covid-19 pandemic, there is also the need to anticipate and provide for the impact of so-called 'long Covid', with over 100,000 people testing positive for Covid19 in NI it is as yet unclear what the longer term needs of some of these people may be. The advice sector will be able to play a key role in supporting these people, as well as monitoring how well our social security system fits this new need.

**Summary Comment / Points Raised:**

- 1.3 Advice sector services are currently operating at full capacity with the very real possibility of there being increased demand when furlough ends in April. There is a need for more staff not less.

**Summary Comment / Points Raised:**

- 1.4 The loss of around 45 staff from the independent advice network would be both traumatic for the staff involved and disastrous for the clients they serve.

Advice improves overall health and wellbeing which goes some

**Response:**

The Department recognises the impact the pandemic has had on individuals and that the need for continued advice sector funding is crucial.

**Response:**

The Department recognises the impact reduced funding will have on the sector and is fully supportive of continuing advice sector funding in 2021/22.

way to preventing Welfare Reform displacing costs on to health services. This is vital during a pandemic when health services are already stretched to the limit.

**Summary Comment / Points Raised:**

- 1.5 The sector deals with different issues from a wide range of potential Section 75 groups including those of different ages, men and women, people with disabilities, minority ethnic groups, those from socially deprived areas.

Reduction or loss of services could have a catastrophic impact on not only the advice services offered but also on the mental and physical wellbeing of vulnerable people including migrant, Black, Asian and Minority Ethnic

**Response:**

The Department recognises the impact reduced funding could have on Section 75 groups and is fully supportive of continuing advice sector funding in 2021/22. Communities Minister has given a commitment to continuing advice sector funding in 2021/22.

## Theme 2: Housing

### Summary Comment / Points Raised:

- 2.1 There is concern about the lack of budget to strengthen the welfare mitigations package to protect low-income private renters. This impacts particularly on persons of different age (given the impact on young people under the age of 35), persons with dependents and women (given the impact on single parents, 91% of whom are female).

### Summary Comment / Points Raised:

- 2.2 DfC's proposal to enable the NIHE to discharge its duty to homeless households by placing them in the PRS will increase the number of low income households relying on this sector to provide them with a home in the coming years.

The PRS has grown significantly from 8% of all households in 2003 to 19% in 2019. This has been driven by an increase in young people and single parent households living in the PRS, many of whom rely on housing benefits and are therefore impacted by cuts to the LHA rate.

At the onset of the crisis almost three quarters of the Covid-19 related calls were from people living in the Private Rented Sector (PRS) with affordability being one of the key issues raised. Whilst a welcome step was taken

### Response:

The Department plans to take forward a review of mitigations in line with the Executive's New Decade New Approach agreement. The Department bid for funding to review and extend welfare mitigations in 2021/22.

### Response:

This proposal relates to discharge of the homelessness duty on a tenure-neutral basis, provided that the accommodation meets certain standards. It aims to provide a greater range of solutions to meet housing need, given the lack of supply and the ever-increasing waiting list for a social home.

It is important that the complexities of this proposal are fully understood and that the feedback from the consultation on the Review regarding conditions for discharge are carefully considered. Prior to proceeding with this proposal, the Housing Executive will undertake an initial scoping exercise to consider the practicalities associated with implementation.

in response to the Covid-19 crisis to restore the LHA rate to cover the cheapest 30% of market rents there continues to be a significant shortfall for many between their rent and the amount of HB they receive. Rents are increasing in the PRS but the LHA rate will be frozen from April 2021. This means that shortfalls between rent and housing benefits will increase further.

**Summary Comment / Points Raised:**

- 2.3 All groups are impacted by the delay in transforming housing on both in respect of the maintenance and improvement of the public housing stock and potential new social housing supply.

The impact of delaying significant investment in social housing will likely fall hardest on older people and disabled people who often rely on affordable and adaptable social housing and associated services.

All groups in need of adequate levels of social housing are impacted by underfunding the social housing development programme against need. The small increase in net capital funding is disappointing as these funds are insufficient to meet NDNA commitments to enhanced new social home starts.

**Response:**

The Department recognises the impact reduced funding could have on Section 75 groups and is fully supportive of progressing NI Housing Executive Housing Transformation. The Department's Capital budget allocation in 2021/22 will support investment in new social housing supply.

**Summary Comment / Points Raised:**

- 2.4 Increased demand for the mandatory Disabled Facilities Grant above the level included within the Capital Budget will occur as older and disabled people seek to adapt and enhance their home.

The NIHE commissioning prospectus for the SHDP for 2021/22 identifies a need for 2,200 new homes. The Department makes no reference to this unmet need in claiming 1,900 new housing starts for 2021/22.

**Summary Comment / Points Raised:**

- 2.5 Over half of those employed in the gig economy are under 35. Young workers are more likely to be employed in sectors which have been affected by job loss or reduced hours as a result of Covid-19. This group are therefore more likely to be relying on housing benefits to pay their rent.

**Response:**

The Department will consider the points raised when prioritising its Capital budget allocation for 2021/22.

**Response:**

Universal Credit, New Style Job Seekers Allowance, Discretionary Support and Covid-19 support schemes are available to help those who have seen a reduction in hours or lost their job, subject to eligibility.



## Theme 3: Benefit Delivery

### Summary Comment / Points Raised:

- 3.1 Funds need to be reallocated from Covid-19 funding or other Departments budgets to pay for recruitment of sufficient staff to deliver Universal Credit to address Covid-19 economic impact. People already have to wait far too long to access Universal Credit. This will lead to debt, distress and will disastrously impact the vulnerable and those in low-pay.
- There will also be delays in the time taken to process people's change of circumstances, which will result in under or over payments, and creating hardships among families already under extreme financial pressures, push people into debt and impact on their mental health.
- It makes economic sense to invest in the social security system. Reducing support to those on the lowest incomes through the benefits system would damage recovery efforts as it reduces the amount of money that people have to spend in local economies reducing demand at a time when action is needed to create jobs and revive businesses.

### Response:

The Department has recruitment plans in place for the additional staff required to deliver benefits in light of the significant increase in demand for Universal Credit.

The Department has bid for the funding required to support benefit delivery in 2021/22. In the absence of Executive funding, the Department will consider options for the reallocation of budget to ensure the delivery of statutory services is prioritised.

**Summary Comment / Points Raised:**

- 3.2 Deeply concerned about the impact of the Department's proposed Budget allocation on the lives and livelihoods of disabled people in Northern Ireland, in particular on the Department's ability to fulfil its statutory duties under Section 75 (1) and (2) of the Northern Ireland Act 1998 to promote equality of opportunity and its ability to deliver vital public services for disabled people during a public health emergency caused by Covid-19.

**Summary Comment / Points Raised:**

- 3.3 The impact of the Covid-19 pandemic on Universal Credit claimant numbers must be noted. Direct payments in lieu of school meals should continue throughout the summer months and until such times as all children are fully back to school.

**Summary Comment / Points Raised:**

- 3.4 Increase the level of Child Benefit to £50 per child per week to help poorer families stay out of poverty and reflect the additional costs facing parents.
- Increases in the standard allowances for Universal Credit and Tax Credits by £20 are to be welcomed but the Government should mirror these increases to households on legacy benefits also.

**Response:**

In allocating its Final Budget 2021/22 allocation, the Department will aim to avoid any adverse impacts on any Section 75 group.

**Response:**

The Department does not have direct responsibility for school meals. This response will be fed back to the Department of Education.

**Response:**

Child Benefit is administered by HMRC and the rates of benefit are set by the UK Government. The Department plans to take forward a review of mitigations in line with the Executive's New Decade New Approach agreement. The Department bid for the funding to review and extend welfare mitigation in 2021/22.

**Summary Comment / Points Raised:**

- 3.5 At the very least Government should hold on to the increase in the standard allowance even after lockdown has ended to help people get back on their feet.

**Summary Comment / Points Raised:**

- 3.6 The basic levels of Universal Credit should be increased in line with real living wages indefinitely to support those who have lost their jobs.

Concerns remain about the impact of the Universal Credit five-week wait and its impact on low income families and women.

In NI consideration should be given to providing an automatic grant from the Universal Credit Contingency Fund for all those claiming Universal Credit for the first time, reducing the devastating impact of the five-week wait.

**Summary Comment / Points Raised:**

- 3.7 The suspension of benefit deductions should be extended to include Universal Credit Advance Payments.

The Universal Credit Regulations should be amended so that Maternity Allowance is treated in the same way as Statutory Maternity Pay (SMP).

**Response:**

The Universal Credit £20 Uplift was extended by the Chancellor until September 2021. The Department is supportive of this uplift continuing.

The Department plans to take forward a review of mitigations in line with the Executive's New Decade New Approach agreement. The Department bid for the funding to review and extend welfare mitigation in 2021/22.

**Response:**

The Department will consider the points raised when developing any future policies.

From April 2021 the period for repayment of New Claim and Benefit Transfer advance payments will be extended to 24 months.

From April 2021 the normal maximum deduction rate will change from 30% to 25%.

This can leave women in receipt of Maternity Allowance up to £5,000 worse off over 39 weeks of maternity leave relative to women in similar circumstances in receipt of SMP

The pause for deductions for benefit debts (without pausing deductions for child maintenance), should be continued.

The level of Carer's Allowance should be increased and a one-off Covid-19 supplement of £20 a week to match the rise in Universal Credit as suggested by Carers UK should be considered. This would benefit women who provide higher levels of care.

Both of these measures were due to come in from October 2021 but have been brought forward to April.

## Theme 4: Employment Support, such as JobStart

### Summary Comment / Points Raised:

4.1 The Labour Market Intervention (JobStart, Advisory Discretionary Fund and work experience, including child care allowance) have been cut at a time when it is need most. These labour market response offerings would have been particularly beneficial to women.

Agreement needed that “the childcare needs of everyone in the NI workforce must be at the forefront of planning” to ensure parents and providers are not facing unnecessary risks or barriers to work.

There is a robust evidence base demonstrating the specific needs of women and girls and the disproportionate impact of unpaid work and caring responsibilities on women, coupled with disproportionate job losses as a result of Covid-19. Would like to highlight the Feminist Recovery Plan, developed by the women’s sector, which sets out in detail the impacts of Covid-19 on women and girls, and also sets out key areas for action. Evidence from the Feminist Recovery Plan to be utilised as part of identifying action to eliminate negative impacts.

### Response:

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 disabled people can be further from the labour market.

The Department has developed a range of labour market interventions to help people find work. These include a JobStart programme for 18-25 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.

**Summary Comment / Points Raised:**

- 4.2 The lack of budget allocation for job market interventions to help people back into employment will have a disproportionate impact on young people. This impact will likely worsen when furlough schemes end if more redundancies follow.

Cuts in the Labour Market

Interventions impact young people including young disabled people as they will not have support to get employment through JobStart whilst the rest of the UK (England, Scotland and Wales) will have access to the Kickstart Programme.

In the past year 10,720 redundancies were proposed, with manufacturing, retail and wholesale sectors particularly badly hit and unemployment among young people in the 16-24 age bracket is running at 11.7%.

The decision to postpone the launch of the three labour market response offerings, including JobStart, due to an absence of funding, will impact upon young disabled people in NI, with the region already suffering from the lowest rates of employment among the disabled in the UK. With

**Response:**

The Department has bid for the funding to deliver these employment support interventions in 2021/22. The Department's ability to deliver these is reliant on Final Budget 2021/22 allocations from the Executive for both Universal Credit recruitment (Work Coaches) and the proposed Labour Market interventions.

the expected rise in unemployment post Covid-19 coupled with increased demand for jobs, it will become an even more competitive job market where disabled people may well face additional barriers and struggle with the increased competition.

Research suggests that deaf young people are more likely to be NEET (Not in Education, Employment or Training). The Access to Work grant scheme is highly valued by deaf people, however only 5% of young deaf adults are using the scheme and in recent research 90% of young deaf people did not know about the scheme. Job coaches do not typically have the specialist understanding of deafness to adequately support young people.

## Theme 5: Voluntary & Community Sector

### Summary Comment / Points Raised:

- 5.1 Following the release of the Charities Fund in June 2020, the Communities Minister thanked the voluntary and community sector “for the crucial and important role they play in supporting thousands of people across our community.” Indeed organisations across the sector, have and continue to make a vital contribution to the departments Covid-19 response. Future departmental strategies and policies, and therefore the budget reflect this vital contribution and commitment.

### Response:

The Department has bid for Covid-19 funding to support the charities sector in 2021/22. The Department recognises the vital contribution of this sector across communities.

### Summary Comment / Points Raised:

- 5.2 A review of the Supporting People Programme is needed including the pay of staff in Community and Voluntary sector. The sector provide an essential service to statutory agencies by supporting referrals of the most vulnerable people in society. Recognition and fair pay for the sector is overdue.
- It has been 14 years since Supporting People providers received any increase in recurrent funding despite the obvious cost pressures of, for example, inflation, wages and pension auto enrolment. The £6m uplift in no way off-sets the erosion

### Response:

The Department has bid for funding to support the Supporting People Programme and providers in 2021/22. This includes bidding for inflationary uplifts for pay. The Department recognises the vital contribution of the providers and the impact Covid-19 has had on programme delivery and staff.



of 30% of the Supporting People budget through inflation over the last 14 years and should also be seen in the context of steady Heath Trust uplifts of between 1% and 5% per year over the same period.

This year the National Minimum Wage came within pennies of the basic wages we are able to afford to pay to some Supporting People staff. The sector is at serious risk of an exodus of skilled but low paid staff, as they seek alternative employment in sectors which can pay the same, such as supermarkets, that have better employee benefits than our sector can provide. We now have an immediate recruitment and retention crisis in the sector that would be alleviated by securing the £6m that was rejected in the draft budget. This would allow the sector to provide a modest cost of living increase to loyal, skilled and dedicated staff who have worked under extreme conditions over the past 11 months.

**Summary Comment / Points Raised:**

- 5.3 Over the last decade there has been an increase in the number of European citizens coming to settle and work in NI who have required support with a wide range of issues including help with applying for

**Response:**

The Department's 2021/22 Budget allocations will continue to provide support for the voluntary and community sector.

work and out of work benefits. More recently support has been provided to Syrian families and also Irish Traveller families. Very complex Cross-Border issues, particularly in respect of Social Security Benefits are also dealt with.

VCSE organisations across the sector already report significant difficulties in meeting demand and are coming under increasing pressures due to reduced income, public spending etc. with this situation only likely to be exacerbated by the lasting impact of the pandemic and the emergence of Brexit impacts.

**Summary Comment / Points Raised:**

- 5.4 The Voluntary and Community Sector and in particular the Advice Sector, has proven their ability during the pandemic to adapt quickly to emerging circumstances and ensure continuity of services and the development of new services at need. Cuts to funding in one part of the sector impair the delivery of services and the development of every other part of the sector.

**Summary Comment / Points Raised:**

- 5.5 Migrant and BAME communities could also be left open to exploitation due to lack of English language skills and knowledge of the system.

**Response:**

The Department recognises the importance of continued advice sector funding. The Department has bid for the funding required to support the advice sector in 2021/22.

**Response:**

The Department's 2021/22 Budget allocation will continue to provide support to the voluntary and community sector.

## Theme 6: Homelessness

### Summary Comment / Points Raised:

6.1 Homelessness and Supporting People services generally are underfunded by this budget, but young people aged 16-24, older people and people with disabilities will be disproportionately impacted by the underfunding.

Inadequate funding for homeless/vulnerable people without recourse to public funds will impact disproportionately on people from different racial groups.

Lack of funding for emergency accommodation means pandemic related urgent interventions will likely reduce or stop. This will have serious implications for those sleeping rough and will hinder progress made between DfC and DoH through the MoU whereby people sleeping rough are provided with temporary accommodation, during the pandemic, regardless of their immigration status.

Even before the pandemic provision for temporary accommodation was under significant pressure.

As the strategic review for the Housing Executive on Temporary Accommodation states, between 2016 and 2018 “there was a 23% increase in the number of referrals into temporary accommodation.

### Response:

The Department has bid for funding to support Homelessness and the Supporting People Programme and its providers in 2021/22. This includes bidding for inflationary uplifts for pay.

The Department recognises the adverse impacts constrained budgets could have on both homeless and vulnerable people. Subject to Final Budget allocations, the Department’s 2021/22 budget allocations will be targeted to ensure continued support for these critical services.

The pandemic has made matters worse. Between 1 April 2020 and 31 December provision was made for 7320 placements in temporary accommodation compared with 3096 in the equivalent period in 2019 - an increase of 136.4%. The expectation going forward is that demand for temporary accommodation will rise as the lockdown measures are unwound.

This draft budget will have a damaging impact on individuals and families who are homeless or who are at risk of homelessness. These are some of the most vulnerable people in society.

The urgent interventions for a number of people with complex needs with a number of protected characteristics under section 75 will not be met if funding for additional temporary accommodation cannot be provided.

**Summary Comment / Points Raised:**

- 6.2 Lack of funding for Housing Transformation will hinder progress in the long awaited revitalisation programme to ensure sufficient social housing is available to meet demand. It will also reduce opportunities for other service and policy interventions to reduce housing need and inequality and in alleviating impacts of homelessness.

**Response:**

The Department has bid for funding to progress Housing Transformation in 2021/22. In the absence of Executive funding, the Department will consider how the transformation can best be delivered, this may be over an extended period of time.

## Theme 7: Welfare Mitigations

### Summary Comment / Points Raised:

- 7.1 Tax and social security reforms introduced since 2010 have had a disproportionately adverse effect on households with children. New mitigation packages intended to offset these losses are not being brought forward in the flat resource budget, which will have a disproportionate impact on persons with dependents

The inability to mitigate against the two child policy will have a disproportionate impact on women, children, and persons with dependents. The impact of the two-child policy in NI is of particular concern given family size and may also disproportionately affect families from specific religious beliefs and racial groups where there is a trend for bigger families.

Steps should be taken to ensure that the Benefit Cap and Social Sector Size Criteria loopholes are closed as allowed for within the draft budget. We are particularly concerned about the impact of the Benefit Cap, which has a disproportionate impact on lone parents (the majority of lone parents are women).

Since Northern Ireland's high levels of under-occupancy are driven by a shortage of smaller social housing

### Response:

The Department plans to take forward a review of mitigations in line with the Executive's New Decade New Approach agreement. The Department bid for funding to extend welfare mitigations in 2021/22.

The Department has received draft Budget 2021/22 allocations to extend the existing mitigations until 31 March 2022. This includes budget cover to extend entitlement to the Benefit Cap and Social Sector Size Criteria mitigation schemes by closing "loopholes".

The Universal Credit £20 Uplift was extended by the Chancellor until September 2021. The Department is supportive of this uplift continuing.

units, the social sector size criteria primarily affects smaller households and will disproportionately affect people without dependants. Ensuring that all under-occupying social tenants in receipt of universal credit or housing benefit receive the supplementary payment will clearly promote equality of opportunity between people without dependants and those with.

**Summary Comment / Points Raised:**

- 7.2 Urgently draft legislation to extend the existing mitigations and ensure that the welfare reform package continues indefinitely is needed.

Securing funding to strengthen the mitigations package to address new challenges such as the Universal Credit five-week wait, the Two-Child limit and cuts to housing benefits in the private rented sector, is strongly recommended. There are concerns about the impact of failure to strengthen the mitigations package in this way on several section 75 equality groups.

New mitigation packages should include grants to address costs associated with employment, a per-child payment for low income families, and an expanded payment

**Response:**

The Draft Budget includes funding to continue the existing Welfare Mitigations in 2021/22. The Department is progressing to plan in relation to the necessary Mitigations legislation.

The Department plans to take forward a review of mitigations in line with the Executive's New Decade New Approach agreement. The Department bid for funding to extend welfare mitigation in 2021/22.

The Department will consider the points raised when developing any future mitigations package.

The Department has developed a range of labour market inventions to help people find work. This includes an expansion of the Advisory Discretion Fund, including the payment of upfront Childcare costs to support parents' return to employment.

for low income families with young children, based on the Scottish Government's 'Best Start' Grant.

A lack of funding for strengthening the mitigations package to mitigate the UC five week wait, will disproportionately impact upon women and that this should have been identified within the DfC's EQIA.

There is a real concern that with mitigations due at an end in March and April 2021, many people will face a very real 'cliff edge', in relation to the removal of the £20 'uplift' payment, which is a crucial lifeline for some of the most vulnerable people in society.

**Summary Comment / Points Raised:**

- 7.3 Any underspend in the extended mitigations package should be earmarked for specific anti-poverty initiatives.

The Universal Credit £20 Uplift was extended by the Chancellor until September 2021. The Department is supportive of this uplift continuing.

**Response:**

The Department's budget for mitigations is ring-fenced and any underspends must be surrendered to the Department of Finance. Whilst the Executive determines reallocation of funding, the Department will raise the matter of using underspend for anti-poverty initiatives with Department of Finance for consideration by the Executive.

## Theme 8: Education

### **Summary Comment / Points Raised:**

- 8.1 Extend money paid to families for free schools to cover all school breaks and holidays.

### **Response:**

The Department does not have direct responsibility for school meals. This will be fed back to Department of Education.

### **Summary Comment / Points Raised:**

- 8.2 Demand for library services increase during periods of need. Therefore lack of funding to library services to provide core business could impact upon the ability to reach and provide local access points for vulnerable people, rural communities and to help children and young people with their education

### **Response:**

The Department recognises the adverse impacts constrained budgets could have on library services. Subject to Final Budget allocations, the Department's 2021/22 Budget allocations will be targeted to ensure continued support for this vital service.



## Theme 9: Irish Language

### Summary Comment / Points Raised:

9.1 The Government has a statutory responsibility, emanating from the Good Friday Agreement, and subsequent political agreements, including the NDNA, to promote the Irish Language, and this duty currently falls to the Department for Communities. However, there is no consideration in the EQIA of the need to increase the provision for the Irish language and the potential impact of a failure to do so on the Irish-language minority community.

Irish language, and Irish-language community, as a minority language community, appears not to have been considered in the document, nor in the Draft Budget. The EQIA also fails to make any reference to the Irish-language minority as a minority contained within the Section 75 categories.

Responsibility for the language sector is not referenced in the Easy Read Document. Given that the fastest growing section of the Irish-language community is of school-going age, this is unfortunate.

Given the extent to which issues associated with the Irish language is currently challenging relations in the north, the EQIA should give greater cognisance to the issue.

### Response:

The Department has bid for funding in 2021/22 to progress the Irish Language and Ulster-Scots Language strategies.

This funding would permit the Department under Section 28D of the Northern Ireland Act 1998 to produce a draft Irish Language Strategy and a draft Ulster Scots Language in 2021/22.

This work would also give consideration to programmes and schemes which will assist in the development of the Irish language and the Ulster Scots language.

The Department's ability to support this work will be subject to Final Budget 2021/22 allocations from the Executive.

Modest Government support for the language, recognising its minority-language status, and recognising the Government's duties under the EU Charter for Regional or Minority Languages, has the potential to improve stability in our communities, leading to greater economic development and social benefits. This, in turn, will result in the issues associated with promotion of the Irish language being removed from the political arena and addressed as an issue of rights and equality for a minority. This will be of considerable benefit to the community in general and to the Irish-language community in particular.

There is a need to fund new services in the future such as the Office of Coimisinéir Gaeilge and the Translation Unit.

The government of the south has given the Language Body a budget increase of €1.3 million for 2021. The Government of the north is expected to provide their 25% share and confirm this soon. We would want to see a commitment from the Department to provide the 25% of about £1 million.

Consider the scope for making Teilifís na Gaeilge more widely available and encourage and financially support the production of Irish language films and television programs in Northern Ireland.

The Irish-language minority is likely to be represented within the Roman Catholic community, in the younger age group, and to be represented more highly among the nationalist communities. Irish language communities are for the most part in areas of disadvantage, particularly in Belfast and Derry. Many come from homes that qualify for Free School Meals, and from areas of higher than average unemployment. The Irish language communities are mostly located around Irish-medium schools.

**Summary Comment / Points Raised:**

- 9.2 Any planned funding for services in Irish must be made on a 3 year basis.

**Response:**

The Department would welcome multi-year (three year) budgets. This is an Executive priority as outlined in the New Decade New Deal agreement. The Department will continue to engage with Department of Finance in lobbying for multi-year budgets.

## Theme 10: NDNA programmes

### Summary Comment / Points Raised:

10.1 Recommendations in NDNA just disregarded. The Draft Budget 2021-22 settlement provides no NDNA allocation for the Department to deliver on the commitments made by the Executive in January 2020.

DfC's role in promoting diversity and participation in society, and responsibilities in relation to social inclusion, including the development of the gender equality strategy, disability strategy, and sexual orientation strategy will deliver on critical NDNA targets to support to some of the most vulnerable groups of children and young people in NI.

During 2020 these strategies were launched with expert panels established and reports produced. The next stage of the process is co-design and co-production of the strategies and developing an implementation plan. Has this work been wasted?

Any budgetary discussion particularly one as clearly short-term as this one-year budget has to be seen in a broader context. Of particular relevance in this regard is the contrast between the broad ambition of the NDNA timetable/aspiration and its (pre-Covid) financial limitations.

### Response:

The Department bid for the funding required in 2021/22 to take forward the Executive's priorities as outlined in the New Decade New Deal agreement.

However given the Department's largely flat draft Budget 2021/22 allocation (with only £1m additional for existing Welfare Mitigations), this constrained budget position will put at risk the Department's ability to deliver on the Executive's commitments.

The Department's assessment of the New Decade New Deal priorities that can be delivered will be subject to the Executive's Final Budget 2021/22 allocations.

**Summary Comment / Points Raised:**

10.2 Funding should be provided for the development of Sub Regional Stadia in line with NDNA. Lack of funding will lead to discrimination and a negative impact upon female and disabled participation in football.

**Summary Comment / Points Raised:**

10.3 There is no reference to the Irish language commitments that fall to the Department associated with the NDNA.

The St Andrews Agreement of 2006 (15 years ago) stated: 'The Government will introduce the Irish Language Act reflecting on the experience of Wales and Ireland and work with the incoming Executive to enhance and protect the development of the Irish language.' the Irish language community is still waiting for this. There is no protection of the rights of the Irish language community, so there is an urgent need to implement the commitments in NDNA immediately.

According to NDNA, there is a need to fund new services in the future such as the Office of Coimisinéir Gaeilge and the Translation Unit. Estimates of the cost of implementing legislation relating to the new Irish

**Response:**

The Department bid for the funding in 2021/22 to progress Sub Regional Stadia in line with NDNA. The Department's draft 2021/22 Capital will support this work.

**Response:**

The Department has bid for funding in 2021/22 to progress the Irish Language and Ulster-Scots Language strategies.

This funding would permit the Department under Section 28D of the Northern Ireland Act 1998 to produce a draft Irish Language Strategy and a draft Ulster Scots Language in 2021/22.

language duties in NDNA include a one-off start-up cost of £9 million and £2 million for the annual cost.

**Summary Comment / Points Raised:**

10.4 The Institute for Fiscal Studies identified that women were more likely to be negatively impacted by lockdown measures noting that “because women disproportionately work in retail and hospitality, Covid-19 is likely to have a bigger effect on their earnings”. Unlike the rest of the UK, NI remains without a childcare strategy or a range of statutory duties to ensure adequate childcare provision. This is despite the commitments within NDNA.

In line with commitments made in NDNA, an adequate government-funded childcare provision must be a priority throughout 2021-2022 in NI budgeting and decision-making. The childcare sector in NI faces many challenges, with these challenges, the barriers for women accessing work, education and training will continue to rise.

**Response:**

The Department recognises the adverse impact unemployment can have on woman and people with dependants. The Department has developed a range of labour market interventions to help people find work. This include an expansion of the Advisory Discretion Fund, including the payment of upfront Childcare costs to support parents’ return to employment.

The Department has bid for the funding to deliver these intervention in 2021/22. The Department’s ability to deliver these interventions is reliant on Final Budget 2021/22 allocations from the Executive.

## Theme 11: Special rules for Terminal Illness

### Summary Comment / Points Raised:

11.1 The existing Special Rules system demands a degree of accuracy in predicting life expectancy that is simply not possible for many life-limiting illnesses. People should not be excluded from the fast-track system, resulting in delays and distressing assessments in order to access their benefits, just because it is too difficult to predict whether their life expectancy is longer than six months. Dying people and other campaigners have been calling for reform of the Special Rules for some time. The current rules are cruel and disproportionate on people who are sick and disabled.

It is important to acknowledge that the different treatment of terminally ill people who cannot meet the six month life expectancy criterion was ruled as in breach of Article 14 (protection from discrimination) of the European Convention on Human Rights in a case before Belfast High Court in June 2020. The judgement of this case stated that “this difference in treatment is manifestly without reasonable justification”, and the terminally ill plaintiff was awarded a financial sum for the “upset, distress, annoyance, inconvenience, worry and humiliation” caused.

### Response:

The Department is committed to bringing forward proposals to change the six months criterion within the terminal illness provisions.

As seen in the recent Assembly debate on terminal illness, all Executive parties are in agreement around changing the status quo and Minister Hargey has indicated that she welcomes the Assembly supporting this position.

The Department’s bid for funding to reform existing provision was not met in the draft Budget allocation for 2021/22.

The £2m bid was based on a 6 month requirement in 2021/22. The Department’s bid was not met in the draft Budget allocation for 2021/22.

When decisions have been taken in relation to the Executive’s final 2021/22 budget allocations, the Department will consider the available options.

Despite recommendations to reform the Special Rules in two independent reviews of Personal Independence Payments in Northern Ireland (carried out by Walter Rader and Marie Cavanagh in 2018 and 2020 respectively), and blanket support for reform in the NI Assembly, dying people are still waiting to see this reform delivered. The acknowledgement in the Department's budget EIA that the unallocated £2m bid means "this work will have to be stopped or significantly curtailed" is therefore a devastating blow.

Time is a luxury that terminally ill people do not have, so we are urging your Departments to work together to ensure the funding is available in the 2021-22 Budget to progress reform of the Special Rules.



## Theme 12: Social Strategies

### Summary Comment / Points Raised:

12.1 There are deep concerns that the DfC bid for its Anti-Poverty strategy has not been met. Given the existing economic impacts associated with Covid-19, evidenced in part by the 98% increase in Universal Credit claims between February and August 2020, it is undoubted that rates of poverty will increase as a result of the pandemic. This hastens the need for the publication and implementation of an appropriately funded anti-poverty strategy to address the causes of poverty, the consequences for those experiencing poverty, and the impacts of social and health problems associated with poverty on public services.

### Summary Comment / Points Raised:

12.2 A number of areas within the Department's areas of responsibility are listed as requiring action to advance equality including gender (including transgender), sexual orientation, disability, age (older people), minority ethnic communities (including asylum seekers and refugees), women and religious groups (Catholics) in respect of adverse impact of welfare reform, economic participation and housing provision. Recommend that the Department's work programme, and associated

### Response:

The Department is committed to ensuring that it fulfils its duties under Section 75 (1) and (2) of the Northern Ireland Act 1998 in relation to having due regard to the need to promote equality of opportunity and to have regard to desirability of promoting good relations.

### Response:

The Department has aimed to ensure that in identifying and taking forward Budget proposals, due regard has been given to the needs and concerns of all Section 75 groups and that the budget bids put forward effectively target the needs of those most vulnerable and at risk.

budget, includes provision to ensure the targeting, monitoring and reporting of actions – incorporating disaggregated equality data - to better advance equality of opportunity and address key inequalities.

**Summary Comment / Points Raised:**

12.3 Despite the gendered economic impact of the pandemic the government response has ignored this and sometimes made existing gender inequalities worse. Targeting government help to those most affected by the crisis, including women, must be the focus of actions from all the government departments in NI to address the impacts and needs of women as a result of the pandemic.

DfC is encouraged not to take a gender-neutral approach to decision-making and budget allocation. This would ensure that women who have been so impacted by these issues are given targeted help to improve their lives and the lives of their children.

It is recommended that gender budgeting and gender analysis be incorporated into the Department's equality assessment process and that the Department builds capacity for gender and equality mainstreaming in the Budget process.

**Response:**

The Department has bid for funding in 2021/22 to progress development of its Social Strategies including development and publication of the Gender Equality, Sexual Orientation, Anti-Poverty, Child Poverty, Disability and Active Aging Strategies. The Department will consider the points raised when developing these strategies and any future policies.

Effective gender budgeting will also take into account the intersectional needs of all women; as various characteristics can compound and exacerbate pre-existing gender inequalities. For example, disabled women, rural women, economically disadvantaged women, minority ethnic women, trans women and LGBT women will experience gender inequality differently to economically advantaged white, cis-heterosexual women, and will face additional barriers. Therefore, the individual and intersectional needs of these groups should be considered when using gender budgeting as a tool for economic policy analysis.

In relation to sexual orientation the draft EQIA data section is limited to passing reference to one statistical indicator on self-identification and does not identify any inequalities (a similar approach is taken to Gender with gender identity limited to stating there is no official statistic). Information on issues facing the LGBT community is contained in a number of the thematic sections.

No reference to those who identify as non-binary or transgender.

Welcome the statement by the Communities Minister (02/02/21) to protect ‘those most affected by the Covid-19 pandemic and current economic crisis - families living in

poverty; low-income families, single-parent families, those with disabilities and children and young people'. Disappointed that older people were omitted from the list particularly as DfC carries policy responsibility for the Active Ageing Strategy.

**Summary Comment / Points Raised:**

12.4 There is a concern that there is a lack of gender disaggregated data in a number of areas including in some areas of benefits (most importantly in Universal Credit), in the government's furlough scheme, redundancies and in poverty and wealth data.

Women lose more on average from the direct tax and social security measures than men, mainly because they are more likely to be receiving benefits and tax credits than men. The biggest average cash losses from the reforms are for women aged 35 to 44 and women aged 75 and over.

The introduction of Universal Credit has had greater negative impacts on women and it has been described as discriminatory by design and women have been disproportionately impacted by a decade of austerity/welfare reform policies.

Gendered welfare reform policies such as the two-child limit and Benefit Cap have had much greater adverse impacts on women.

**Response:**

Mitigation is in place for the Benefit Cap and the Department bid for funding in 2021/22 to mitigate the two-child policy. The Department's ability to progress this mitigation will be subject to the Executive's Final Budget 2021/22 allocations.

## Theme 13: Discretionary Support

### Summary Comment / Points Raised:

13.1 The Covid-19 Discretionary Support Scheme is a cause for particular concern and the design and delivery of the scheme requires urgent review and action. The Minister has indicated that she intends to convene a consultancy panel on the overall Discretionary Support Scheme that she hopes will provide recommendations in June. This is far too late for the thousands of people who need support now

The Universal Credit Contingency Fund should have an enhanced budget and be legislatively removed from the Discretionary Support Scheme. A payment from the Contingency Fund should be offered first and foremost, before the claimant is informed about an Advance Payment, to mitigate the impact of debt for UC claimants.

### Response:

The Department plans to take forward a review of the Discretionary Support Scheme and will give consideration the points raised as part of the review.

The Department's Draft Budget 2021/22 includes sufficient funding to continue the current scheme in 2021/22.

## Theme 14: Other / General Budget

### Summary Comment / Points Raised:

14.1 DfC could use a more targeted approach to spending plans within the draft budget allocation. This would ensure that those who have been the most impacted by the pandemic, welfare reform, inequality and poverty are given the help they need to live their lives to their full potential.

### Summary Comment / Points Raised:

14.2 Would have welcomed an opportunity to engage with the Budget process at an earlier stage. The current short timescale for consultation does not enable stakeholders to effectively engage with the process. As the Budget Bill is also already proceeding through the Assembly, it appears that the potential impact of consultation responses will be limited, which is likely to raise concern and contribute to consultation fatigue among stakeholders. Would urge for a review of the process that led to this short timescale, which can inform more comprehensive future approaches to consultation.

### Summary Comment / Points Raised:

14.3 Thematic sections in the draft EQIA highlighting inequalities in education, employment, and healthcare make no reference to

### Response:

The Department has bid for the funding required to support its statutory, Ministerial and Executive priorities in 2021/22. In the absence of Executive funding, the Department will consider options for the reallocation of budget to ensure services continued to be delivered to support those most in need.

### Response:

The Department would also welcome an earlier and extended Budget and Consultation process. This response will be fed back to the Department of Finance.

### Response:

The Department's Final EQIA has been updated to include:

community background (although this is highlighted in the section on housing). As a consequence, sectarian inequality is not considered in these areas as a “key inequality ground” (as seen in the Table linking Outcomes to key inequality categories that is presumably to form the basis of what is to be monitored). Yet there is significant evidence of inequality in these three thematic areas from official statistics.

Minority ethnic communities were not identified by the DfC’s equality impact assessment. There are links between poverty and ethnicity in N Ireland. No allocation for job market interventions in the draft budget will have an adverse impact on minority ethnic communities. Minority ethnic communities have been disproportionately impacted by Covid-19 due to “systemically unequal access to services and opportunities”.

- people with different religious beliefs;
- people from different racial groups; and
- people with different sexual orientations.

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