



Department for
Communities

An Roinn

Pobal

Department for

Commonities

www.communities-ni.gov.uk



Budget EQIA 2024-25

Consultation Response Summary

May 2025

ANNEX A

Details of the organisations responding to the Department's Budget 2024-25 draft

EQIA include:

- Action for Children NI
- Advice NI
- Age NI
- Alliance Party
- Ards and North Down Borough Council
- Armagh City, Banbridge and Craigavon Borough Council
- Arts and Culture Committee of the Northern Ireland Committee of the Irish Congress of Trade Unions
- Arts Council NI
- Belfast City Council
- British Association of Social Workers NI
- Cardinal Tomás Ó Fiaich Memorial Library & Archive
- Carers NI
- Causeway Coast & Glens Borough Council
- Causeway Volunteer Centre
- Chartered Institute of Housing Northern Ireland
- Cliff Edge Coalition NI
- Coleraine and Limavady Neighbourhood Renewal Partnerships
- Commissioner for Older People of Northern Ireland
- Confederation of Community Groups
- Derry City and Strabane District Council

- Disability Sport NI
- Dry Arch Children's Centres
- East Belfast Community Development Agency
- Equality Commission for Northern Ireland
- Equity
- Fermanagh & Omagh District Council
- Footprints Women's Centre
- Foras na Gaeilge
- Glen Community Parent Youth Group
- Homeless Connect
- Housing Rights
- Irish FA Foundation
- Law Centre NI
- Lenadoon Community Forum
- Lenadoon Women's Group
- Libraries NI
- Ligoniel Improvement Association
- Lisburn & Castlereagh Council
- Mencap
- Mid & East Antrim Borough Council
- Mid Ulster District Council
- Mindwise
- National Deaf Children's Society NI
- National Energy Action NI
- NI Local Government Association

- NI Sports Forum
- NI Women's Budget Group
- NIPSA
- North West Volunteer Centre
- Northern Ireland Commissioner for Children and Young People
- Northern Ireland Council for Voluntary Action
- Northern Ireland Federation of Housing Associations
- Northern Ireland Housing Council
- Northern Ireland Housing Executive
- Northern Ireland Union of Supported Employment
- NSPCC
- Omagh Volunteer Centre
- Outer West Foyleside Local Growth Ltd
- Royal National Institute for the Blind
- Royal Society of Ulster Architects
- Samaritans
- Simon Community
- Sinn Fein
- Society of St Vincent de Paul
- Strabane Local Growth / Neighbourhood Renewal Partnership
- Ulster Supported Employment Limited
- Unison
- Volunteer Centres NI
- Waterside Neighbourhood Partnership
- Welcome Organisation

- West Belfast Partnership Board
- Women's Platform
- Women's Regional Consortium
- Women's Resource & Development Agency

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
Advice Sector	<p>1.1 There is critical need for access to free, independent advice for women affected by austerity, welfare reform, and the Cost-of-Living Crisis. The complex benefits system and the impact of Covid-19 have intensified this need, particularly for vulnerable and marginalized groups. Increased funding should be provided for community-level information, advice, and advocacy services to ensure these individuals can access necessary resources and entitlements.</p>	<p>The Department recognises the importance of continued advice sector funding and the impact that reduced funding could have on all Section 75 groups.</p>
	<p>1.2 Independent advice networks are crucial for helping individuals navigate Northern Ireland's welfare system, and long-term funding is essential for their continued support.</p> <p>Additionally, improved access to debt management services would greatly benefit the community.</p>	<p>The Department recognises the complexity of the benefit system and has continued advice sector funding in 2024/25, particularly given the need to support those impacted by the Move to Universal Credit.</p> <p>The Department's 2024-25 budget has been targeted to ensure continued support for the advice sector this financial year, with no reductions in 2024-25.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
Climate Change / Green Growth	<p>2.1 Climate change poses a significant threat, requiring collective action for solutions. The Affordable Warmth Scheme, which targets fuel poverty and energy inefficiency in low-income households, will see a budget cut to only 50% of the previous year's allocation for 2024-25, which is disappointing. This will cause NI to fall behind on climate change mitigation and just transition.</p> <p>Advice NI is involved in the Sustainable Energy Communities NI initiative, aimed at empowering communities to manage their energy and carbon futures, with Lottery funding secured for pilot activities in four areas. There is an urgent request for the Department for Communities to intensify efforts in addressing these challenges.</p>	<p>The Department is committed to achieving its low carbon ambitions by working collaboratively across Government and with our partners, sharing knowledge, expertise and resources and providing a clear vision on what the future will look like.</p> <p>In December 2024, the Department launched its Departmental Climate Change Action Plan for 2024/25, setting out the key activities the Department intends to take over the next year, to address the challenges that climate change presents to our people, our communities and our places. At its core, is the principle of a just transition to a lower carbon future.</p>
Culture, Arts, Heritage & Sport (incl libraries & museums)	<p>3.1 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>DfC faced an Opening Resource funding gap of £115.8m (17%) in 2024-25. 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 2024-25. Whilst this poses a risk for services provided by the Department's funded ALBs, the Department's opening Budget held funding for ALBs at 2023-24 levels.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>3.2 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>	<p>The Department has sought to hold ALB's funding at 2023-24 levels, whilst additional funding has been provided to offset inescapable pressures in ALBs.</p> <p>The Department recognises and appreciates the contribution that our arts, creative industries, museums and libraries make to our communities, along with the economic, health and education benefits thriving sectors bring. However, with the Department's constrained budget, it is not possible to significantly enhance funding provided to the Culture, Arts and Heritage, Sport and Voluntary and Community sectors.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>3.3 Holding funding for Arm's Length Bodies at the 2023-24 position will in reality be a cut, as the costs of delivery and maintaining existing resources and services will increase. The directive to deliver within their means will have a direct impact on the most vulnerable, especially older people who rely on libraries, and free or low-cost galleries/museums for warm places to visit and socialise.</p> <p>The reduced access will have an impact on physical and mental health. For young people and single parent families', libraries in particular are vital for accessing information, services and equipment they would not otherwise be able to or would expend high costs on things such as printing, internet access and study spaces, therefore creating a gap in education opportunities for young people in poverty.</p> <p>The reduction in the provision of subsidised sports access would also have a detrimental impact on young people particularly in physical and mental health and further widen the existing health inequalities in our population.</p>	<p>The Department continues to work with its ALBs to seek to minimise any impact on the ALB's service delivery.</p> <p>The Department has held ALB funding at 2023-24 levels, whilst additional funding has been provided to offset inescapable pressures in ALBs.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>3.4 The public library standard for investment in book stock and related resources has been set at £2.25 per head of population which, based on the 2022 Mid-Year Population Estimates, equates to a budget requirement of just under £4.3 million annually. The funding level proposed in the EQIA will only allow for an allocation of £0.82 million, equating to a per head of population spend of £0.43, significantly less than the £2.25 target set by the public library standard and a marked reduction from the 2023/24 spend of £1.55 per head of population.</p> <p>In reality, this means that when standing subscriptions are accounted for there will be approximately £0.5m available to purchase books for the library service during 2024-25.</p>	<p>The Department has sought to hold ALB's funding at 2023-24 levels, whilst additional funding has been provided to offset inescapable pressures in ALBs.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>3.5 The universal nature of the public library service means there will be impacts right across the service and previous data suggests potential for specific impacts on the following Section 75 Groups: Age, Disability, Dependents, Gender & Race.</p> <p>Inadequate library stock provision will impact directly on participation levels, as the scale, scope and relevancy of materials offered diminishes, and will disproportionately impact on a number of section 75 groups, reducing the provision of material in ethnic minority languages, languages other than English, large print and audio book formats, which are heavily used by older people and those with visual impairments and children's materials in general.</p> <p>The importance of reading for children and young people is vital to their literacy, language, reading and overall development. A high proportion of book loans are to primary school and pre-school children. Consequently, children and young people make extensive use of libraries, particularly after school in the late afternoon and early evening. Promoting a love of reading and developing the library habit, supports positive mental health and wellbeing in children and contributes to general development, literacy levels and education.</p>	<p>The Department continues to support NI public library services within its limited 2024-25 Budget. It should be noted that no adverse impacts on S75 groups were identified from the Department's 2023-24 Budget allocations to Arm's Length Bodies.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>3.6 Parents and carers of young children make extensive use of play and structured learning activities and resources available in the library. As well as providing educational and learning for young children, these activities and resources also provide important community centred social engagement and interaction for parents and carers to help them support their children’s education and development both before and through their school years. As the public library service for Northern Ireland,</p> <p>Libraries NI has a duty to collect and preserve the history and culture of all communities through the acquisition of local, national and international publications. The inability to make timely purchases will result in gaps in Collections, which again impacts on the comprehensive nature of the service, with consequences for future generations and their ability to have access to materials relevant to developing a shared understanding of the history and culture of Northern Ireland.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>3.7 In parallel to the challenges of maintaining the existing public library estate and fleet infrastructure there is a need to replace assets, modernise and develop new facilities, respond to changes in environmental, societal and demographic demands and to provide for the future and this requires capital investment to be made. While Libraries NI plan for and develop projects to address these investment needs, supporting capital funding has been sporadic and difficult to secure in an increasingly competitive public sector environment. In the absence of a reliable strategic capital funding stream, we have been forced to attempt to maintain assets far beyond their natural life, adding to the pressure on resource budgets, increasing the risk of catastrophic failure and failing to meet the expectation of the public in providing fit for purpose facilities and services.</p>	<p>The Department has sought to hold ALB's funding at 2023-24 levels, whilst additional funding has been provided to offset inescapable pressures in ALBs.</p>
Discretionary Support	<p>4.1 While the 10% increase to the Discretionary Support Grant Budget is welcomed, given the unprecedented levels of support in recent years due to the increased cost of living, there is concern that this will not be sufficient to meet demand, leaving many in need without sufficient aid. This is likely to affect groups including low-income families, disabled people, older people, and women.</p>	<p>DfC faced an Opening Resource funding gap of £115.82m (17%) in 2024-25, with the Department acknowledging that managing a Resource pressure of this magnitude will undoubtedly impact on the Department's ability to meet demand for public services in 2024-25.</p>
	<p>4.2 The growing demand for Discretionary Support loans highlights the continued need for this assistance, as many households in Northern Ireland struggle with the cost of living.</p>	<p>In considering allocation of the Department's constrained 2024-25 Budget, careful consideration has been given to balancing</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>4.3 The delay in accessing Discretionary Support loans creates additional financial burden and could lead to a breakdown of tenancy and a lack of sustainment.</p> <p>4.4 Grants should be prioritised within this system, rather than loans. This is of particular importance for newcomers to Northern Ireland with urgent needs.</p> <p>Law Centre continues to call on the Department to ensure that budget allocations to Discretionary Support respect the legislative integrity of the scheme and ensure Decision Makers retain the discretion necessary to ensure the most the vulnerable claimants can access necessary support.</p>	<p>priorities, need and available funding to maximise the supports the Department provides to those who need it most.</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> <p>To ensure support is available, the Department's Discretionary Support Grant Budget was increased to £25.5m for 2024-25. It is anticipated this will be sufficient to meet the full level of demand from those eligible and facing hardship in 2024-25.</p>
Employment Support, such as LMPs	<p>5.1 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>5.2 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>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 2024-25 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>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>5.3 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 to reduce dependence on the benefit system.</p>	<p>The Department acknowledges the impact that Labour Market Partnerships budget cuts would have on vulnerable people and Section 75 groups. Labour Market Partnership funding will be sustained at 2023-24 levels for 2024-25.</p>
	<p>5.4 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, women who have stepped out of the workforce and find it difficult to return without the right skills provision.</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. Additionally, across 2023-24 and 2024-25, the NIO provided a funding allocation to Northern Ireland of £15m for JobStart, and</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>5.5 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>the UK Government is providing Shared Prosperity Funding of £57m.</p> <p>In considering allocation of the Department's constrained 2024-25 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 recognises and values the importance of the Labour Market Partnerships with Councils and the positive outcomes which can be delivered.</p> <p>The Department has sought to mitigate the impact of its constrained budget on vulnerable people and Section 75 groups, with LMPs sustained at 2023-24 levels and not reduced in 2024-25.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>5.6 Uncertainty with regards to the LMP budget allocation will have a disproportionate impact on those who are furthest from the labour market. A funding reduction for LMPs is short-sighted and will have long term impacts. DfC and Councils have invested time and effort into the development of a local mechanism (LMPs) which has had positive impacts on unemployment and economic inactivity at a local level. The initiative, which is in its third year of operation, has been a success. The Council is concerned that if a similar approach to budgeting comes forward in following years, this will negatively impact future schemes which have been in planning, thus impacting confidence in the system, the LMP process and its ability to make a difference.</p> <p>5.7 The Department needs to get its priorities right. Employment is very important, especially for young people just starting out, the programme has been very successful in stopping these youngsters falling into a life of not working. It is very short sighted of the Minister to not add up what it will cost to the taxpayer of leaving these people to fend for themselves, health costs, benefits costs, all of these things.</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.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>5.8 The continuation of the Labour Market Partnerships is vital to support people into employment and produce positive outcomes for the local labour market. Locally we have witnessed the benefit of the Labour Market Partnership to those individuals that require upskilling to enter the labour market.</p> <p>The Job Start Scheme has proved highly successful in helping young people enter the labour market, and the fact that budget constraints mean that the scheme cannot be further extended is disappointing. The Department undertaking further review of its existing suite of employment programmes and their longer-term viability is timely to ensure pathways to work sited as essential to address poverty and wellbeing throughout the document is improved and enhanced.</p>	<p>The Department acknowledges the impact that 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 2023-24 levels (not reduced) in 2024-25.</p>
	<p>5.9 We regret that JobStart support for young people will not expand and are concerned at suggestions that other employment supports may be reviewed – these are long term investments and cutting them back will have long term consequences.</p>	<p>The Department regrets that continued funding has not been secured to sustain the JobStart scheme for young people aged 16-24. The Department acknowledges this reduction may have adverse impacts across all Section 75 groups. However, as a mitigation, access to help those seeking support into employment is available through a range of employment programmes provided by the Department.</p>
	<p>5.10 We are disappointed that given the Department's restricted funding allocation, it will be unable to extend the JobStart programme and has indicated it is reviewing other employment programmes.</p>	<p>The Department recognises the adverse impact unemployment can have on young people, men and women, disabled people, 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</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>These employment programmes are the foundations for a more equal job market, and reduced poverty and hardship in the long term. They are an essential investment in Northern Ireland's future, and we urge the Department to maintain current funding, and increase funding as soon as possible.</p> <p>5.11 The proposed cuts to employment support services will disproportionately affect those who are already struggling to find work, including individuals with disabilities, single parents, and those with low skills or qualifications. Without adequate support, these individuals are at risk of long-term unemployment and poverty, which in turn increases their reliance on welfare benefits and other public services. The failure to invest in employment support services will also have broader economic consequences, as a growing number of people are excluded from the labour market and unable to contribute to the economy.</p> <p>5.12 The continuation of Labour Market Partnerships is essential to support people into employment and deliver positive outcomes for the local labour market. Locally, these partnerships have had a positive impact in helping individuals upskill and enter the workforce. The success of the Job Start Scheme in helping young people enter the labour market is notable, and it is disappointing that budget constraints prevent its further extension.</p>	<p>market.</p> <p>Given the high disability employment gap in Northern Ireland, the Department has continued work to explore funding options to mitigate impacts to people with disabilities.</p> <p>The Department has developed a range of labour market interventions to help people find work. These include Labour Market Partnerships, 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>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>Young people and in particular those aged 18 to 24, face a particular disadvantage in the labour market at a time in which the DfC staff numbers are static with large numbers of vacancies.</p> <p>5.13 Given Northern Ireland's poor economic inactivity figures, disability employment gap and gender pay gap it needs a long-term strategy to address these wider structural issues and considerable investment in these areas. While the funding remains for these it has not been increased and that essentially means a real terms cut given rising prices.</p> <p>5.14 It is very concerning that the Department will be unable to progress an extension of its JobStart Scheme and take forward other parity employment support interventions in 2024-25. Considering the amount of young people not in education, employment or training (NEET) this is very short-sighted. The inability to progress an extension to this Scheme will therefore have greater adverse impacts for young women.</p> <p>Any reductions in or the removal of funding for employment programmes would be very worrying especially for women, people with disabilities and minority ethnic communities who are more likely to need employment support.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>5.15 Where poverty has been identified as a potential adverse differential impact of this budget decision, we ask the Department to specify fuel poverty too - since low incomes is a primary cause of fuel poverty, and this budget decision reduces employment support.</p> <p>5.16 By taking away the JobStart programme you are disadvantaging young ones in care, those that are not from here, and isolating those with disabilities by taking away their opportunity to get work with an employer, especially the ones with mental health problems.</p> <p>Reduce the payments for benefits and put it into helping young ones into work or you will have a bigger bill in the long run with young ones costing more in health and benefits.</p> <p>5.17 No mitigation has been suggested by the Department to offset the adverse impact that not extending the JobStart scheme will have on people of working age, particularly young women, which is of concern.</p>	<p>The Department regrets that continued funding has not been secured to sustain the JobStart scheme for young people aged 16-24. The Department acknowledges this reduction may have adverse impacts across all Section 75 groups. However, as a mitigation, access to help those seeking support into employment is available through a range of employment programmes provided by the Department.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>5.18 The screening of LMPs and Job Start stated that there will be a disproportionate impact on women, but the data that was provided did not reveal how they will be impacted. We agree with the Department that women will be disproportionately impacted, but data demonstrating how women are more likely to work part-time, how women are more likely to be underemployed, and how women are more likely to be 'economically inactive' would demonstrate that cuts to these programmes will have a greater impact on women. This applies to areas where the Department predicts positive impacts.</p> <p>5.19 The EQIA does not make any reference to Workable NI and Access to Work programmes, or their planned successor programmes. These 2 programmes have proven to be critical in supporting people with a learning disability to access and progress in employment;</p> <p>The Department should resume the important work of co-designing a new replacement programme, for these, along with the VCS sector. A review of these programmes would require a separate EQIA consultation.</p>	<p>The Department is continuing funding for Workable NI and Access to Work programmes in 2024-25, with no reduction planned.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
Equality	<p>6.1 Departmental consultations are valuable, but without the bigger picture, true equality of opportunity remains at risk. Going forward we urge the Department of Finance to prioritise a full strategic EQIA to safeguard vulnerable citizens and promote true equality.</p>	The Department of Finance have undertaken a consultation on the Executive's Draft 2025-26 Budget.
	<p>6.2 It is disappointing that the proposed budget allocations were made without a finalised PfG. The PfG should be the cornerstone for strategic decision-making within the budgetary process. It should clearly outline the NI Executive's public service priorities, including a standalone housing outcome reflecting its unequivocal importance. Furthermore, a PfG would identify areas targeted for transformation. The current lack of a PfG creates a strategic vacuum, leaving budgetary allocations without a clear rationale or alignment with overarching priorities.</p> <p>We echo the repeated calls from the NI Assembly's Public Accounts Committee, supported by the NI Fiscal Council, for a stronger connection between the PfG and budget processes. A more joined-up approach to budgeting, with clearer strategic direction, is essential to ensure funding allocation aligns with the planned outcomes detailed under a finalised PfG.</p>	The Department's future year budget bids will reflect the funding needed to deliver on the Executive's Programme for Government.
	<p>6.3 Need for multi – year Budgets is critical.</p>	The Minister strongly supports the need for multi-year Budgets.

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
Homelessness	<p>7.1 An adequate supply of social and affordable housing is fundamental to any long-term goal to end homelessness. The Capital DEL allocation, providing for an insufficient maximum of 400 new builds, directly undermines the objectives of the Homelessness Strategy and all but guarantees its failure.</p>	<p>Despite a heavily constrained Budget, the Department has allocated an additional £6.7m to the NI Housing Executive in 2024-25, including funding for Homelessness – to prevent the risk of homelessness service closures and to ensure that statutory obligations can continue to be met.</p>
	<p>7.2 If Northern Ireland is to make progress on tackling the housing crisis, resource and policy space for prevention and early intervention initiatives must be carved out alongside ensuring there is an adequate supply of housing.</p> <p>There should be a much greater focus on preventing homelessness in Northern Ireland. The introduction of a cross-government statutory duty to cooperate to prevent and alleviate homelessness would go some way to ensuring the prevention of homelessness is a priority across government."</p>	
	<p>7.3 This budget will undermine efforts to address homelessness and to reduce the social housing waiting list, which is at record levels. Regrettably, this number will only continue to rise.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>7.4 The cumulative effect of the cost-of-living crisis and proposed budget reductions across public services (including the limitations placed upon Discretionary Support in the past 12 months) will increase the number of people encountering affordability issues and struggling to retain their homes, which may, result in an increase in the number of homeless presentations.</p> <p>7.5 The Homelessness sector requires sustained levels of increased investment. Otherwise, it will not be able to provide the support which is so desperately needed by so many people living here.</p> <p>7.6 Over the past five years, there has been unprecedented growth in the number of households requiring temporary accommodation, soaring from 4,527 placements annually to 11,368 in just five years, an increase of over 150%. The number of households currently living in temporary accommodation is a small proportion of the households who are entitled to do so. It is likely that the numbers seeking temporary accommodation will rise, as allocations to new and existing social housing reduce.</p> <p>Given the dependence on accommodation in the private sector and reflecting trends in the cost of private rented sector accommodation, the cost of providing temporary accommodation has increased dramatically in recent years, increasing the cost of meeting our statutory obligations.</p>	<p>The Department recognises the adverse impacts constrained budgets could have on critical homeless services and that there is increased demand for Emergency Accommodation since the pandemic, which is showing little sign of reducing.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>Temporary accommodation costs are 5.7 times greater in 23/24 than in 2017/18 (£4.6m to 26.1m)</p> <p>7.7 Homelessness and inequalities are inextricably linked, with many homeless households having a range of distinct needs. On a daily basis, NIHE deal with younger people, young people leaving care, children living in temporary accommodation, women fleeing domestic abuse, migrant workers, refugee families and households with mental health or addiction challenges. People with disabilities who experience homelessness also have distinct needs and requirements. A shortfall in services will have an adverse impact on all of these groups.</p> <p>7.8 There has been a considerable increase in the number of refugees with 'leave to remain' entering the homelessness system, therefore, a reduction on funding could have an adverse impact on equality of opportunity on the grounds of race.</p> <p>7.9 Spend on temporary accommodation, a demand-led service to meet our statutory obligations, reduces capacity to fund prevention services. The level of constraint on the homelessness budget in recent years, coupled with rising demand, has meant that responsive services have been funded at the expense of strategic programmes such as homelessness prevention and tenancy sustainment.</p>	<p>The Department acknowledges that 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 been given to this when determining final budget allocations.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>7.10 The indicative allocations would put many Homelessness services at risk. These services support a range of people with distinct needs and from a Section 75 perspective will be adversely impacted by any reduction in support. Service closures could leave thousands of people experiencing homelessness without services to enable them to resolve their homelessness.</p> <p>7.11 In relation to the data, needs or issues in relation to Section 75 equality categories:</p> <ul style="list-style-type: none"> i) The Welcome Organisation profile of full-time staff is 72% female thus any impact of cuts would have a particularly negative impact on females and for those who are parents a subsequent impact on children. ii) 10% of service users LGBTQ+ iii) 26% of Service users are prison leavers iv) 46% of service users are 18-25 yrs v) 34% service users' male addiction alcohol & 37% service users with drug addiction vi) 40% service users' female addiction to alcohol & 36% service users with drug addiction 	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>7.12 The interconnection between homelessness, addiction, mental health challenges and trauma creates a complex set of needs which, exacerbates the ongoing vulnerability of those affected. Homelessness services deal with cross departmental issues. Those who use these services have needs beyond housing and in particular support with physical and mental health is oftentimes exacerbated by homelessness. In the absence of these needs being met through other statutory services, and in particular health and social care and justice, it is unacceptable that the services left to fill the void are at risk.</p> <p>7.13 Supporting homeless people and people rough sleeping is a vital area of social work practice and it is essential additional funding is provided to meet need in this area.</p> <p>7.14 Key services such as Community-Based Support and Prevention, the Homelessness Prevention Fund, Housing First for Youth, and Complex Lives are at risk due to funding shortfalls. These programs are critical for vulnerable populations, including those with mental health challenges, addiction issues, and individuals leaving care or the justice system.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>7.15 The homelessness sector continues to experience a severe recruitment and retention crisis, affecting the sector's ability to deliver essential services. A substantial number of employees have cited low pay as the primary reason for their departure. This trend not only affects morale within the organisation but also disrupts the continuity and quality of care provided. When skilled and dedicated employees leave, it creates gaps in service delivery, leading to increased workloads for those who remain, which in turn exacerbates the problem.</p> <p>7.16 Fuel poverty is obviously linked to homelessness since those experiencing it are without a home that is suitable for their physical needs – including affordable warmth. The final EQIA document should identify fuel poverty as an adverse impact of inadequate funding for homelessness intervention.</p> <p>7.17 More up to date (post-2020) data to reflect emerging needs during the Cost-of-Living crisis is required, to identify current shortfalls in supporting housing for older people, women at risk of domestic violence, people with disabilities, and homeless people who experience addiction. This data is important for effective resource allocation and ensuring equitable access to safe and secure housing.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>7.18 Vulnerable people will be more at risk of exploitation and harm as they make compromises to find somewhere to live. No children and young people under 18 should be placed within unregulated accommodation, such as B&Bs.</p> <p>There will be a disproportionate impact on health and justice services by people who are genuinely roofless and desperate. The cost on the public purse is therefore likely to be far more than the amount saved.</p> <p>There is particular concern about the continued use of hotels as temporary accommodation, the length of stay in temporary accommodation, the lack of move on accommodation, and that this will have a potential greater adverse impact on young people significantly at risk of homelessness.</p> <p>There is little information available from this EQIA on the impact of the budget on children and young people who have been granted asylum. Indeed, those being granted asylum is only mentioned twice in the EQIA with no available data either under the ‘age’ or ‘race’ categories.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>7.19 Without adequate investment in preventing homelessness and tackling the root causes of poverty, more resources will continue to be eaten up each year by expensive temporary accommodation – notably through the increasing use of hotel/B&B accommodation, as well as single let accommodation.</p> <p>Asylum seekers – including those in BAME communities – will face significant adverse impacts as the Housing Executive becomes responsible for their housing following a positive decision on asylum claims. The UK Government’s recent ‘streamlined’ process for speeding up the asylum decision-making backlog has further driven demand for temporary accommodation placements.</p> <p>7.20 The Department should implement the Homelessness Strategy 2022-2027.</p> <p>The Department should prioritise preventative measures which can provide cost-effective ways of reducing the number of people becoming homeless in the first place, including:</p> <ul style="list-style-type: none"> • Examining the feasibility of a Preventing Repossessions Fund, providing small interest free loans or grants to help households with short-term financial difficulties to avoid becoming homeless due to mortgage possession. • Providing access to independent advice for people in mortgage or rent arrears, including emergency help at court proceedings. 	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<ul style="list-style-type: none"> Strengthening the pre-action protocol for mortgage arrears proceedings to ensure all reasonable options to avoid possession are considered thoroughly. Introducing similar pre-action protocols for social housing rent arrears possession proceedings to ensure eviction is always a last resort. Making affordable credit facilities more accessible, for example by encouraging new initiatives involving social housing providers and credit unions. 	
Housing	<p>8.1 As of November 2023, 50,150 private renters in Northern Ireland had a shortfall between their LHA and their private rent. The average monthly shortfall for Universal Credit recipients was £129, and for Housing Benefit recipients, it was £97. Despite a welcome realignment of the rate of LHA to the lowest 30 percentile, in April 2024, this trend is likely to remain for the long term as long as supply needs are not being met.</p> <p>8.2 Less social housing means more reliance on an already overwhelmed private rented sector, driving up rent and increasing reliance on limited support such as discretionary housing payments, which risks increased levels of homelessness due to loss of private rented accommodation. This incurs a significant cost to the public purse and fuels temporary accommodation demand, further increasing costs. It is, therefore, extremely unlikely that perpetuation of this cycle will result in savings of any kind to the public purse.</p>	<p>Despite a heavily constrained Budget, the Department allocated an additional £48.5m to the NI Housing Executive for New Build Social Housing - to enable total delivery of c.1,400-1,500 houses in this financial year.</p> <p>The Department has considered the points raised during the EQIA process when prioritising its Final Capital budget allocations for 2024-25, while working with the NIHE to ensure allocation will be made in the most effective way possible to support those most in need.</p> <p>The Department recognises the impact that reduced funding could have on Section 75 groups and is fully supportive of progressing</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.3 It will be very challenging for the Department to meet the target of a third of the 100,000 homes being social homes. To achieve the goal of building over 33,300 social homes over fifteen years the Department would need to fund around 2,200 new social housing starts each year. It requires time to build up capacity to build this number of houses. To only be able to start up to 600 social homes in 2024/25 makes achieving the target even harder. An average of around 2,335 social housing new starts would be required over each of the next fourteen years for the target to be met.</p> <p>8.4 There has been a considerable growth in the number of households on the Social Housing Waiting List (SHWL). Over the last decade, there has been:</p> <ul style="list-style-type: none"> - an 18% increase in the number of households on the social housing waiting list to now stand at 47,312; - a 64% increase in the number of households in housing stress on the list to now stand at 35,564; - and a remarkable 133% increase in the number of households with homelessness status 	<p>NI Housing Executive Housing Transformation.</p> <p>The Department's Capital budget allocation in 2024-25 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>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.5 The level of need for temporary accommodation is placing enormous pressure on the NIHE budget. In 2023/4, the Housing Executive spent £34.395 million on provision of temporary accommodation for households in private single lets and non-standard B&B and Hotel accommodation. This is a staggering increase of 495% on the amount spent five years before.</p> <p>8.6 There is concern regarding the effect of 50% reduction of the Affordable Warmth Scheme budget on Carers, who often experience additional costs, including costs for heating, due to the needs of the cared for person.</p> <p>8.7 There is concern regarding the proposed budget allocated to the Social Housing Development Programme. Housing is one of those key policies which deserves a greater degree of prioritisation. We understand that this policy will be at the forefront of a forthcoming Programme for Government, therefore surely it should receive sufficient funding to ensure that the outcomes can be achieved.</p> <p>8.8 The cut to this programme will have lasting implications for the strategy to address housing waiting lists across Northern Ireland. There will also be a lasting impact on the professionals who work in this area, if there is a lack of activity.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.9 The indicative allocations in the EQIA will have an adverse impact on those already experiencing housing need and housing inequality particularly those who are homeless, those living in fuel poverty and energy inefficient housing, and those in need of housing support services to live independently.</p> <p>8.10 Reductions in grants for low-income households living in the private sector are likely to have a material and immediate impact on health budgets.</p> <p>8.11 While the £2m allocation to the Affordable Warmth Scheme will help with the rising levels of fuel poverty, it will be insufficient to meet the level of need.</p> <p>8.12 Indicative funding for the Affordable Warmth Scheme in 2024/25 (£7.175m) results in a shortfall of £10.325m against the projected requirement of £17.5m. There will therefore be a 53% reduction in the number of homes availing of the Scheme in 2024/25 to circa 1,281 when compared with last year (2,746). It is likely that the proposed reduction in the programme outputs will adversely impact on:</p> <ul style="list-style-type: none"> • Older people and persons with disabilities and others who are impacted by exposure to cold temperatures or who have need for higher temperatures in their homes. 	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>• Persons with limited financial means and who spend a disproportionate amount of household income on fuelling inefficient heating systems, or who live in houses that have inadequate thermal capacity. This is more likely to impact adversely on persons with disabilities who are less likely to be in employment and older people living in older housing.</p> <p>8.13 If projected housing need continues to increase, based on current trends, it is reasonable to assume that annual SHDP completions will continue to fall below the annual increase in Projected Housing Need and, consequently, the SHDP will have no material impact of “turning the curve” to commence the process of reducing social housing need figures.</p> <p>A new build requirement of 24,992 homes has been identified for the period 2023-2028. It is evident that any Budgetary constraints that have the effect of reducing new build provision below the current ambition to deliver 2,000+ new social housing starts per annum would have a significant detrimental impact on meeting housing need and require action to increase the provision of new build properties in future years to above the current ambition of 2,000 per annum.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.14 The number of social housing new starts over the last four years has been as follows: 2,403, 1,713, 1,956 and 1,506. This is an average of 1,894 over the last four years. The target for social housing new starts in 2024/5 was 2,000 homes. The anticipated budget capital budget provided will only allow for up to 20% of that target to be met.</p> <p>This drastic cut frustrates the policy direction of the Executive and undermines the policy direction set out in the Homelessness Strategy 2022-27 and the draft Housing Supply Strategy.</p> <p>8.15 Housing associations are prepared and able to deliver in excess of 2,000 new social homes per annum with in-house expertise in developing new schemes combined with robust financial planning, all they need is for government to provide the adequate funding.</p> <p>The current model in financing new social housing in Northern Ireland is effective and provides value for money because for every £100 provided via the SHDP, housing associations are able to raise an additional £84, thus ensuring we can deliver as many new homes as possible every year.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.16 Any significant reduction in budget will impact those living in rural areas. New social housing targets in rural areas have been repeatedly missed with a target of 14% of all new social homes being built in rural areas. Due to lack of land availability, planning delays and reduced economies of scale when building smaller schemes in rural areas, a significant reduction in new build starts will have a negative impact on all waiting list applicants across Northern Ireland.</p> <p>8.17 The breakdown of applicants across Councils raises the potential that any reduction in the provision of social housing to have disproportionate impacts on applicants from a Catholic background. Changing demographics, especially in Greater Belfast can also mean a disproportionate impact on applicants from minority religious and ethnic backgrounds who have applied for social housing.</p> <p>Further information and analysis should be conducted on the evolving background of applicants in Belfast and across Northern Ireland.</p> <p>8.18 The impacts of cuts to housing services and support in accessing benefits on women and girls are likely to be significant and wide reaching, with long term impacts, including deepening poverty and extended benefit reliance, worsening health and increasing stress.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>The impact on children, including extending child poverty, cannot be overestimated, as child poverty is the main risk factor for poorer outcomes throughout the life course."</p> <p>8.19 For women, rising house prices and rents, as well as increasingly limited choice and a long-term lack of housing suitable for people with disabilities has specific impacts, as women typically are responsible for household budgets, and will also manage demands associated with unsuitable or overcrowded housing, with potential health impacts for themselves.</p> <p>In addition, lack of suitable housing and support services is likely to increase women's caring responsibilities, which in many cases are driving women out of the workforce.</p> <p>Migrant communities face significant challenges in integrating and settling locally, as they often are allocated temporary housing with frequent moves disrupting children's school attendance and adults' ability to seek work or build businesses.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.20 Older people in Northern Ireland are more likely than other age groups to experience fuel poverty. Such a drastic cut to the Affordable Warmth Scheme would represent an unfair burden on older people. The impacts of such cuts affecting health and well-being are significant and disproportionate. As fuel poverty is seen to increase with age, it will be an increasing problem as Northern Ireland's population continues to age.</p> <p>8.21 The significant reduction in targets from 2000 to 400 new homes is extensive and likely to increase the numbers of people in housing stress or homelessness.</p> <p>Building social homes is an essential investment in a balanced housing market, and the primary route to sustainable housing for many low income households: given that approximately 500 social homes are sold each year, a decrease in social housing stock at this time is hard to fathom.</p> <p>8.22 The very low allocations of Affordable Warmth funding will cause NI to fall behind on climate change mitigation and just transition.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.23 There is insufficient evidence and analysis on the impacts of the significant reduction in the Affordable Warmth programme. Key data sources should include up to date information from the Utility Regulator tracker, figures from the Consumer Council's 2022 study of fuel poverty levels, and survey information from National Energy Action. These sources all clearly show the high levels of energy poverty being experienced, and the concentrations amongst certain groups including Section 75 protected groups.</p> <p>8.24 The EQIA states that there may be a disproportionate impact on people with disabilities from many funding reductions, including from reduced social housing output, Affordable Warmth, and benefits administration. This is very concerning as people with disabilities and their families are already at a far higher risk of poverty in Northern Ireland, and 51% of people who live in a family with a disabled member live in poverty compared to 35% of the total population.</p> <p>8.25 Any reduction in housing benefits or support for social housing will lead to an increase in homelessness and housing insecurity, with vulnerable groups such as single parents, people with disabilities, and young people being particularly at risk.</p> <p>The lack of affordable housing is a significant barrier to overcoming poverty, and further cuts in this area will only deepen the housing crisis and increase the social and economic costs associated with homelessness.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.26 DCSDC Council's concern regarding the local housing situation is illustrated by the establishment of a Housing Crisis Taskforce and the passing of a number of Motions regarding this issue.</p> <p>The health and wellbeing impacts of poor housing stock, the change of family homes to multiple occupancy and the increased rent costs of private rented accommodation will all have an impact on our already high levels of health inequalities, particularly for the very old and the very young and asylum seekers.</p> <p>Rural women, particularly older women, more frequently experience poor housing conditions. This is further exacerbated by the higher heating costs in rural areas.</p> <p>8.27 Simon Community's client base provides a clear illustration of the vulnerability of those who will be hardest hit by the reduction in social housing development:</p> <ul style="list-style-type: none"> •Disability: Nearly a quarter (24%) of the people Simon Community support have a disability. •Young People: Nearly 29% of the people Simon Community support are under 25 years of age. •Older Adults: Approximately 9% of the people Simon Community supports are over 55. •Women: Women account for almost one-third (32%) of those supported by Simon Community. Women, particularly those fleeing domestic violence, rely heavily on social housing for safe and stable accommodation. 	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>•Ethnic Minorities and Irish Travellers: Of the 582 people supported daily by Simon Community, 78 are from non-white backgrounds and two are White: Gypsy or Irish Traveller, making up 14% of the total client base while only being 3.4% of Northern Ireland's total population.</p> <p>•LGBTQ+ Community: Around 6% of people Simon Community support identify as LGB+, three times higher than the 2021 Census finding of 2.1%. LGBTQ+ individuals are more likely to experience homelessness due to family rejection or societal discrimination.</p> <p>8.28 Given the NIHE's central role in upholding the right to housing, the blanket budget freeze on all Arms-Length Bodies (ALBs) must be reconsidered. Housing is foundational to social stability and well-being, and without sufficient housing support, the impact of other social services will be diminished. The Department must prioritise funding for the NIHE to uphold housing rights, reduce inequalities, and ensure the sustainability of Northern Ireland's housing system.</p> <p>8.29 There is concern that the Executive has decided to maintain parity with the UK government on the transition of Winter Fuel Payments to a means-tested entitlement.</p> <p>There is a need to undertake an equality impact assessment as there is significant evidence that it will have differential impacts on some Section 75 groups, including a disproportionate adverse impact on women.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.30 Reductions in social housing stock have a disproportionate impact on women who are overrepresented amongst social renters and are more likely to be on lower incomes and in housing need. 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> <p>8.31 The Department ought to consider the following research illustrating the scale of the fuel poverty crisis in Northern Ireland, and its impacts – especially in relation to Section 75 equality categories:</p> <p>LucidTalk – ‘NEA NI: Northern Ireland Attitudinal Poll’ (September 2023) - In September 2023, polling for NEA NI found that 41% of NI households were spending at least 10% of their total household expenditure on energy costs and were therefore living in fuel poverty - a reflection of increasing prices. Choosing between heating and eating is very much a reality for around 100,000 homes in Northern Ireland.</p> <p>Utility Regulator - ‘Energy Hardship: Consumer Lived Experiences’ (July 2024) - This research found that most participants were already doing all they could to cut back on energy costs and were tightly managing their budgets, just to get by. For the majority of those interviewed, they had experienced changes in their</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>circumstances (for example marriage breakdown, job loss or health issues) that had resulted in having to manage on a lower income. Many participants were skipping meals or drastically reducing their energy use to levels below their daily living needs. This research highlights the need for greater support for those on lower incomes to protect them against fuel poverty.</p> <p>8.32 Reducing funding for the Affordable Warmth Scheme is counterproductive to achieving 2050 decarbonisation targets and addressing fuel poverty in Northern Ireland. The Department should reassess its decision to reduce funding to the Affordable Warmth Scheme and outline to the Executive the need for more capital funding to invest in this scheme or similar. Improving homes through the implementation of energy efficiency measures is essential to tackling fuel poverty and households need support to do this. These measures will help reduce energy consumption and help consumers save money on their bills.</p> <p>8.33 Increasing the supply of housing needs to be the focus of the budget. There are loads of empty properties that could be fixed up to accommodate the high demand for housing. The more housing there is, the more move on options there are and the less hidden homeless cases and people on the street there will be.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.34 There has been no publication of an agreed Programme for Government for this mandate. This budget is not in keeping with agreed housing priorities as outlined in the NDNA deal.</p> <p>The budget allocated towards housing provision and tackling homelessness is entirely insufficient and will have a damaging impact on children and young people directly and indirectly at risk or experiencing homelessness and poor housing quality.</p> <p>The number of households presenting as homeless from April to June 2024 was 4,197 which includes 1,222 families. 2,608 households were accepted as homeless as Full Duty Applicants, 947 of those being families, with accommodation not being reasonable or loss of rented accommodation as the two biggest factors.</p> <p>8.35 Failure to progress the building of social housing in areas of greatest objective need will cause adverse impacts for people from minority ethnic backgrounds (who tend to experience significantly more overcrowding), single people (who experience poorer housing conditions), older women (who experience poorer housing conditions than men in rural areas), disabled people (who are more likely to live in poor housing conditions and in homes that are ill equipped for their needs) and households with dependants (who are more likely to live in overcrowded social homes).</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.36 There is significant evidence that the decision to maintain parity with Great Britain by transitioning Winter Fuel Payments to a means-tested entitlement will have differential impacts on Section 75 groups.</p> <p>Older people, who are not entitled to Pension Credit but whose income is still low enough that they are struggling with the cost of living, will feel the loss of the Winter Fuel Payment most acutely. Due to the gender pension gap, the people in this income bracket are more likely to be women than men. The Pensions Policy Institute reports that women in their late 50s have less than 66% of the pension savings as men – a difference that causes significant harm to women’s quality of life and dignity in older age.</p> <p>The Department should pause the implementation of this policy until a full EQIA can be undertaken, including an exploration of alternative policies and mitigating measures to prevent differential adverse impacts on women and other Section 75 groups.</p> <p>8.37 Housing and Homelessness are key issues with blatant gendered impacts. While both women and men fleeing domestic abuse/violence would be impacted by the lack of funding for homelessness, this is a particularly gendered impact, as 69% of all domestic crime victims are women according to PSNI Statistics 2020-21.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>There was a nearly 9% increase in households presenting as homeless citing domestic abuse/violence as the reason from Q1 2022 to Q1 2023. Despite this, there was a nearly 3% decrease in households accepted by DfC as homeless that cited domestic abuse/violence as the reason over the same time period.</p> <p>Many women fleeing domestic abuse/violence are forced into temporary accommodation, but many Women's Aid NI refuges are at or nearly at capacity, and there are limited women-only homeless facilities - an impact felt even greater in rural areas.</p> <p>8.38 Age UK research published in February 2024 demonstrates that energy costs continue to be the greatest source of anxiety for older people with regard to their finances and that 59% of over 60s with an annual household income under £20,000 worry about their ability to heat their home. Combined with the loss of other cost of living payments that have been in place in recent years, and the fact that Northern Ireland does not have an energy price cap or any other measures to mitigate consistently high energy costs, the loss of the Winter Fuel Payment will be devastating to many pensioners.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.39 It is deeply disappointing that the Department would propose such a drastic cut to the Affordable Warmth Scheme which is essential to delivering reduced energy costs in the long term, particularly considering the important work ongoing within DfC to develop a fuel poverty strategy and effective mechanisms for delivery of support to those who most need it,</p> <p>The unprecedented rate of increase in energy costs in recent years has had a particularly detrimental impact on older people, many of whom are living on a modest fixed income. Older people can also face additional energy expenses due to disability or care needs and are more likely to have larger heating bills due to living in poorly insulated homes with inefficient heating systems. Living in a cold home has more significant health impacts for older people than the rest of the population;</p> <p>In light of the fact that thousands of older people are set to lose access to the Winter Fuel Payment, it is strongly recommended that the Department reconsider this cut to the Affordable Warmth Scheme.</p> <p>8.40 In January 2023, over 4,844 children were living in temporary accommodation in Northern Ireland, including over 1,365 children aged nine and under and 1700 aged 10-17. Will any of the £15.0m/400 homes be specifically targeted for these more vulnerable groups?</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>In relation to age, the EQIA refers to the Audit of Inequalities which identifies young people (18-25) as having the lowest working age employment rates and highest rates of unemployment and economic activity. It is argued that the adverse impacts of the budget in this area should incorporate 16–25-year-olds (for those leaving school at 16, not in further education or employment.)</p> <p>We do not think this EQIA adequately captures the potential impact this budget will have on children and young people 0-25 in a number of areas. More broadly, there is a lack of intersectionality in the analysis around how budgets in every department can and should be measured in terms of how they will or will not achieve impact concerning Universal Child Rights. We believe a Child Rights Impact Assessment should be incorporated into all EQIA processes, including this one. Child poverty is not mentioned or linked with the issues facing the social security system (and reduced staffing to deliver it). Housing instability or homelessness impacting this age group is also not mentioned or considered in terms of the cross-departmental/whole-Executive impacts across health, social care, education, economy etc.</p> <p>Links between disability or long-term illness/poverty/dependents/carers is also not included within this impact assessment.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.41 The lack of safe and high-quality housing impacts on people’s health, life opportunities and security. Proper investment in housing provision is needed, with particular emphasis on shared, mixed tenure developments. It is clear that the duplication and inefficiency of single-identity areas and housing developments is compounding pressure on housing waiting lists.</p> <p>8.42 The majority of the Housing Executive strategic housing functions are either contractual, statutory in nature or being delivered following a Ministerial decision. Therefore, actively managing a reduction in financial resource requirements will mean directly reducing services and impacting on our ability to meet our statutory obligations.</p> <p>The Housing Executive’s Corporate Strategy and annual business plans are developed by prioritising those individuals, groups and geographical areas most in need and experiencing the greatest levels of inequality. This allows the Housing Executive to adjust programme delivery, recalibrate financial forecasts, and to re-prioritise based on sound evidence.</p> <p>8.43 The failure to meet the £44.5m forecast requirement for the 2024-25 year is worrying for the most vulnerable in our community, this coupled with mental health needs and overstretched addiction services compounds the difficulties across this area.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>8.44 There may be a belief in some quarters that the private sector can pick up the slack in the provision of social housing or that other funding sources, such as Financial Transactions Capital (FTC), may be able to help meet demand. As the draft Housing Supply Strategy outlines, some policy and regulatory changes may help to boost housing supply in the private sector.</p> <p>In spite of significant practical hurdles, we are aware of some innovative uses of FTC to provide move-on accommodation for households living in temporary accommodation. However, these measures will simply not measure up to the scale of house building that we need, especially for social housing.</p> <p>8.45 DfC has a massive remit and not enough money which leaves them in a very difficult position. This document and consultation are to be congratulated.</p>	
Languages	<p>9.1 The Department's commitment to improve access to and recognition of Sign Language (both British Sign Language and Irish Sign Language) is warmly welcomed, as well as the commitment of the Minister to support the introduction of Sign Language legislation to the Northern Ireland Assembly in 2024.</p> <p>The provision of support and funding for Sign Language as well as the development of training and accreditation routes for Sign Language tutors and interpreters is</p>	The Department did not reduce funding for languages in the 2024-25 Budget allocations and will continue to provide essential support and funding for the Language Sector including Sign Language.

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>essential to ensuring deaf children, young people, their families and, of course, the wider Deaf community have equal access to services in statutory and public sectors as well as more widely.</p> <p>This area of the Department's work is not referenced in the document and assurance is sought that this work will be ongoing and is not being considered within the proposals of the current budgetary process.</p>	
Rates Support Grant	<p>10.1 The Rates Support Grant (RSG) provides financial support, on an annual basis, to those councils whose needs exceed their wealth relative to other councils within Northern Ireland. Central government recognises the impact of wealth, deprivation and rurality and their associated impact on rates bills for rate payers through the RSG. It was devised to assist the least wealthy, most deprived and rural Councils in providing equality of service provision with the wealthier Councils. At present 7, out of the 11 Councils receive the RSG and therefore will be impacted by the cuts. These 7 councils are the less wealthy, most deprived, and rural areas.</p>	<p>The Department has carried out a separate screening exercise on the Rates Support Grant.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>10.2 RSG 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.</p> <p>10.3 Women are more likely than men to be economically inactive. The RSG cut widens this inequality. The 7 councils in receipt of RSG already have an average of 2.7% of female claimants of working age vs an average of 2.3% of those councils not in receipt of RSG. They also have a lower average disposal household income of £17,196 vs those councils that do not receive RSG of £18,450.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>10.4 With the additional cuts to RSG, the 7 councils will have to increase the rates within their districts, further reducing disposable income and impacting women further. With the level of claimants in receipt of benefits in the 7 councils receiving RSG, there is little ability to recoup costs for services in leisure services and events, and indeed for those in low-paid employment, any rates increase is difficult to budget for. This also undermines policies to promote physical activity through recreational and leisure services.</p> <p>10.5 The decision to implement the Rates Support Grant cut in 2024-25 has been screened out for Section 75 Equality purposes with minor impacts identified. A number of equality and rural needs concerns and disparities with regard to the Councils impacted and not impacted, have been raised.</p> <p>10.6 The Department's decision to reduce RSG without notice, consultation, equality impact, or rural needs impact assessment the 2022/23 RSG allocation will have significant negative impacts on both Section 75 categories and rural dwellers.</p> <p>It would be inappropriate for the Department to consolidate multiple EQIA and rural needs assessments within the EQIA subject to this consultation exercise. The Department are asked to explicitly and formally confirm its intention to consult again with relevant stakeholders and consultees in relation to this amendment.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>10.7 The proposed cut to the Rates Support Grant needs to be seen in the context of drastic cuts to the amount available to eligible councils over the past ten years. Since Local Government Reform, the amount for RSG has reduced by over 80%. As the Department is aware, the calculation of the RSG is dependent on a number of key datasets, one of which is NI Deprivation Scores. A loss of this scale of funds will have the effect of compounding hardship in communities, particularly those in the most deprived areas.</p> <p>10.8 This year’s reduction in the Rates Support Grant (RSG) will affect frontline services and all Section 75 groups.</p> <p>The RSG is designed to have a redistributive effect across the region, however, this design principle appears to have been largely ignored as reflected by the repeated reduction in this grant (declining from £20.8m 2007-08 to £3.1m in 2024-25). As wealth and need are assessed relative to other Council areas, seven Councils who are worse off than the other four Councils, are effectively ‘competing’ for a share of a very small, and decreasing, grant value. Residents in these councils are at an even greater socio-economic disadvantage than residents from those Councils not in need.</p> <p>The notice of the reduction in the RSG comes after Councils have made budget cuts and after the rates are struck.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>10.9 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 these support both customers and staff requirements.</p>	
Social Security Benefit Delivery	<p>11.1 It is unacceptable that the Department’s allocation puts at risk social security services to those most vulnerable people reliant upon the social security system 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); be exposed to greater risk as ‘Move to UC’ is rolled out and have less recourse to crisis support via the Discretionary Support Scheme.</p>	<p>The Department bid for the funding required in 2024-25 to recruit the additional staff needed 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 implement the IT infrastructure required to support benefit and pensions delivery.</p>
	<p>11.2 Universal Credit has done little to support or protect women; the difficulties with the five-week wait for first payment are particularly significant and include families resorting to food banks, but the strict conditions and restricted payments are also creating challenges for women, who often have caring responsibilities, which limit availability for work.</p>	<p>The Department’s Universal Credit Contingency Fund is in place and funded in 2024-25, to support those impacted by the 5 week wait.</p>
	<p>11.3 The cost of state pensions is projected to double over the next 15 years and to continue to rise after 2040. Given the Department is operating with insufficient staffing levels, this increase in pension claims and payments risks over-</p>	<p>Given the constrained financial position at NICS level, the Department’s Benefit Delivery bids were not met. To mitigate the risk to benefits and pension service delivery</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>burdening the Department's pension delivery service, with delays in pension and benefit payments likely.</p> <p>Degradation in services will directly impact upon older people in a disproportionate manner, with more older people at risk of experiencing financial vulnerability and poverty.</p> <p>11.4 The continued Departmental vacancy control and the total of 695 full time equivalent vacancies across the Department could have a detrimental impact on the delivery of social security benefit and pensions to those most vulnerable in our community, leading to mental health difficulties. With longer waiting times for new claims and changes to existing services this will cause financial strain and increase the number of people in crisis and reliant on support from the community and voluntary sector.</p> <p>11.5 There is concern about the potential deterioration of telephone and customer services standards as a result of the Department carrying so many staff vacancies. This is particularly important in light of the transition to Universal Credit (UC), with research suggesting 1 in 5 people do not successfully complete the move from legacy benefits to UC. This has serious implication for people on the lowest incomes who need to maximise the levels of support they receive in a</p>	<p>(including the Move to Universal Credit), the Department has worked to sustain services and implement the Move to Universal Credit within its existing staff complement. This position is not without significant risk and has greatly exacerbated the pressures already being felt in operational benefit delivery areas, with potential impact on service delivery.</p> <p>The Department continues to closely monitor benefit and pension service delivery performance and clearance times throughout the year. Where possible, action is taken to mitigate any impacts on benefits and pension service delivery.</p> <p>The Department acknowledges that its reduced 2024-25 Budget could have impacts across all Section 75 groups.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>complex system.</p> <p>Any reduction in support and advice available to people will impact the numbers and the process of transitioning to UC. It is very unfortunate that the Department itself can only forecast deteriorating service levels. A more comprehensive mitigation strategy must be proposed.</p> <p>11.6 Further reductions in the administration and delivery of welfare benefits will lead to delays in payments, increased errors, and reduced access to essential support for those in need. For individuals and families already living in poverty, any disruption to their benefits can have devastating consequences, including rent arrears, debt, and homelessness. Furthermore, the reduction in funding for benefits advice services will leave many claimants without the support they need to navigate an increasingly complex system, leading to greater financial insecurity and distress.</p> <p>11.7 The failure to adequately resource benefit delivery, including child maintenance and discretionary support service could lead to a breach of the UNCRC (United Nations Convention on the Rights of the Child) Article 26: 'Governments should provide money and other support to help children from poor families'.</p> <p>In the case of moving clients to Universal Credit – the risk of missing deadlines has increased with fewer staff resources</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>to help the increasing numbers of existing and new claimants.</p> <p>Regarding the closing of tax credits activity, if the remaining circa 24,000 tax credits claimants in NI have not been migrated by 5 April 2025, they will lose their access to welfare support. It is pertinent that an EQIA analysis is completed on the S75 characteristics of this group, given it is known that they are extremely vulnerable individuals.</p> <p>11.8 There are concerns regarding inadequate staffing levels within the Child Maintenance Service. It is likely that the majority of child maintenance payments are made to women and therefore women will be more adversely impacted by inadequate staffing levels. Women are also more likely to claim social security benefits and are more likely to earn less over their lifetimes and have poorer pension provision. Therefore, women are more likely to be impacted by pressures on staffing levels</p> <p>References to increasing debt stock in the EQIA are concerning. The EQIA states that prioritising new benefit claims will lead to “slippage in lower priority areas, such as debt referrals and increase the overall debt stock.”</p> <p>There is also concern re: the Move to Universal Credit Programme. Moving to a new benefit often causes concern, questions and problems with the process, which suggests the need for greater levels of support, not less, in order for the migration process to be successful.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>The document also outlines that the aim to progress the move to Universal Credit with the existing staff complement is “not without significant risk” and is impacting on service delivery and risks to the wellbeing of staff.</p> <p>11.9 Research on the Impact of Universal Credit on Women highlighted a range of design flaws with Universal Credit including the five-week wait, problems with Advance Payments, the online nature of the benefit, how childcare costs are paid, the single payment, the rigidity of Universal Credit assessment periods and increased conditionality and sanctions. Many of these problems are likely to have greater impacts for women.</p> <p>This research found that almost all of the women reported negative impacts due to the five-week wait for Universal Credit, with many needing to borrow money from family members/friends or lenders to survive. Some had been forced to cut back on food/essentials to make ends meet and others had resorted to selling their possessions or using a foodbank. The wait caused stress/anxiety and impacted negatively on their children.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>11.10 It is critical that people have timely and accurate decisions on their benefit claims. There are numerous risks associated with delays in the award of entitlement to benefits. Therefore, it is imperative that Department provide opportunity for all Tax Credit claimants to migrate in advance of 5 April 2025.</p> <p>Additional resources have been allocated by the DWP in relation to an ‘enhanced support’ journey for individuals in receipt of income support and ESA, who may require additional assistance. It is important that equivalent measures here are suitably resourced to address the S. 75 groups identified facing a disproportionate impact.</p> <p>Adequate staffing levels are essential to mitigate the risk of reduced standards in decision making. DfC need to monitor the actual occurrence of official error decisions in Universal Credit to identify the potential impact of reduced staffing levels.</p> <p>11.11 Staff shortages are likely to impact Blind and Partially Sighted people (BPS) in ways that were not identified in the EQIA. Specifically, RNIB is concerned that unfilled staff vacancies will lead to adverse outcomes for BPS individuals in terms of both employment and benefits.</p> <p>Research has shown that approximately one in four BPS individuals in the UK are not accessing the benefits to which they are entitled, with two of the key barriers being inaccessible communication and a lack of face-to-face</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>appointments. Decreased staff capacity raises the prospect of this becoming even more pronounced in the short- to medium-term. This tailored support is also required for BPS people to obtain and retain employment.</p> <p>Where BPS job applicants are aware of the Access to Work programme, they face the additional barrier of the suspension on face-to-face appointments, making the process of obtaining the necessary tailored support extremely protracted, if not impossible.</p> <p>Given the staff vacancies outlined in the EQIA, RNIB is concerned that DfC staff will refrain from adequately promoting the Access to Work and Workable (NI) programmes for fear of generating additional applications that limited staff will need to process.</p> <p>Moreover, given the end of the JobStart programme, combined with uncertainty of future funding for the Skillset programme, 16-25-year-old blind and partially sighted individuals will likely suffer the greatest disadvantage from the DfC staff vacancies.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>11.12 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>The potential cuts to the delivery of front-line services and the migration of legacy benefits to Universal Credits (UC) requires additional staff which will not be recruited. The migration from legacy benefits to UC is already causing anxiety for claimants with the 5-week waiting period – any delays will cause more stress for claimants.</p> <p>11.13 The Department plans to deliver the Move to UC, for tax credit claimants only, within the existing staff complement. This presumably leaves other legacy benefit claimants at great risk of losing their access to welfare support, if the Department’s staffing complement is not increased.</p> <p>11.14 Insufficient staffing levels within DfC are contributing to service delivery within the social security system, and this is a particular concern in the context of Universal Credit migration. Too many UC claimants are not receiving their first payments on time, and this contributes to severe financial strain and ill-health.</p> <p>11.15 Carers Allowance overpayments demonstrate the need for advisors who can provide specialist advice to people, to ensure they are aware of the entitlements and how changes impact them.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	An increase in benefit cuts will result in more demand for advice , and this could align with a reduction in welfare advisors, which will impact women, older people and people with a disability.	
Social Strategies	<p>12.1 The lack of Social Inclusion strategies is not mentioned in the consultation document, but constitutes a major omission, which limits options and opportunities to deliver on the equality duties of the Department.</p> <p>It is vital that the suite of Social Inclusion strategies is completed and implementation secured by the end of this year, as the current situation is deepening inequalities, which is driving both an increase in demand for public services and fuelling the rioting witnessed in recent days. It is incumbent on the Department, as lead for equality, to take a leadership role in addressing inequalities, and this must be initiated with resourced strategies.</p>	Work has been undertaken on draft Social Inclusion Strategies for consideration by the Executive. The final content of each Strategy, including the resources required for delivery, will require Executive approval.

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>12.2 Growing up in poverty increases the chances of a child coming into the care of social services. Children living in the most deprived areas of Northern Ireland are six times more likely to be placed on the Child Protection Register and are four times more likely to become looked after by social services than those in the most affluent areas.</p> <p>A failure to deliver an anti-poverty strategy will also disadvantage disabled people, with rates of disability-free life expectancy significantly lower in the most deprived areas of Northern Ireland.</p> <p>12.3 There is no mention in the EQIA of the Department’s pending Anti-Poverty Strategy or any funding allocations being considered to effectively implement the Strategy and Action Plans.</p> <p>The Department’s wider Social inclusion Strategies, which includes an Anti-Poverty Strategy, the Disability Strategy and an LGBTQ+ Strategy, are for the second year, omitted from the Department’s 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>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>12.4 It is vital that an anti-poverty strategy is urgently delivered by the Minister for Communities and that it is informed by the recommendations of the Expert Advisory Panel appointed by the Minister's predecessor and the recommendations published by members of the Anti-Poverty Strategy Co-Design Group. The strategy should be appropriately funded and it is essential it receives the support of all Ministers in the NI Executive.</p> <p>BASW NI is concerned that the Department for Communities (the Department) EQIA does not recognise the impacts of the failure to deliver an anti-poverty strategy. The impacts will be greatest for women, children, disabled people and people from an minoritised ethnic background.</p> <p>12.5 The strategic role of the Department in relation to key policy measures, for example, the Disability and Anti-Poverty Strategies, which can directly impact on outcomes for deaf children and their families should also be acknowledged. As budget proposals continue to be considered, we note that undertaking a Child Rights Impact Assessment will support this process.</p> <p>12.6 Decisions taken to deliver short term savings, will likely lead to significantly greater costs in the longer term. While the cost of mitigating the two-child limit would be £56.4m per year, this figure must be evaluated in the context of the March 2024 report from the NI Audit Office, Child Poverty in Northern Ireland, which estimates the cost of child poverty in the region</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>to be between £825m and £1bn per year.</p> <p>The Child Poverty Action group estimates that Child Poverty costs the UK economy at least £39 billion per year. Additionally, the Department of Health has estimated the costs associated with health inequalities to be £1.7 billion per year.</p>	
Staff / Vacancies	<p>13.1 Staff pay and conditions have not kept pace with many other sectors.</p> <p>13.2 The EQIA would have been enhanced by the inclusion of further necessary detail to clarify and confirm, for example:</p> <ul style="list-style-type: none"> a. That Agency costs have not been incurred to compensate for the staffing reductions; b. How c.50 FTE staff could be removed from legacy and pensions operational delivery staffing complements at a time when the Council understands that other pensions administration teams are seeking to increase staff complements to meet the expected and acknowledged increase in workload associated with, for example, the McCloud case. In the absence of such clarification, a 2.5% cut in such circumstances is difficult to comprehend; c. How redeployment of staff (number unspecified) has been delivered while not filling 600 (out of an unspecified number) vacancies; 	<p>The Department has robust complementing methodologies in place to determine the staff numbers required to maintain service delivery. Whilst the Department's 2024-25 Budget is constrained, the Department continues to prioritise its available resources to best support service delivery.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>d. How, in the face of robust vacancy control, redeployment of staff and not filling 600 vacancies, the Department's overall headcount has not reduced as opposed to not increasing as stated;</p> <p>e. How resource pressures, increasing workloads and critical vacancies have been managed, and what service reductions (elective or otherwise), movements in sickness levels, and extensions in project delivery and/or other timescales have manifested as a consequence of these issues;</p> <p>f. What service reductions or reprioritisations, and/or extensions in project delivery and/or other timescales have manifested as a consequence of the curtailment of discretionary and stopping all overtime spend apart from essential and out of hours requirements;</p> <p>g. The monetary and percentage quantification of amounts of discretionary and all overtime spend including the associated analysis of these amounts to show essential and out of hours requirements.</p>	
Supporting People	<p>14.1 Due to the nature of SP provision, with clients requiring support due to an identified need that enables them to live in the community, any EQIA of the SP Programme must consider addressing these needs as equivalent to promoting equality in terms of disability and/or age of those impacted.</p> <p>More analysis should be conducted to establish who would be impacted with regards to removal or reduction of SP services, but it is likely to include Section 75 groups</p>	<p>The Department values the outcomes delivered through the NI Housing Executive's Supporting People Programme and its providers and recognises the vital contribution of the providers during the Covid-19 pandemic and Cost of Living crisis.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>such as older people, young people, victims of domestic abuse, Irish travellers and migrants.</p> <p>14.2 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>The fund also supports organisations working with victims/survivors of domestic violence, which play a vital role in safeguarding women and children, and seeking to end domestic abuse.</p> <p>14.3 The Supporting People programme has experienced several budgetary freezes over recent years. Consequently, the budget is unlikely to be sufficient to address demand for services.</p> <p>14.4 Increase in SP funding is welcome. However, given the shortfalls identified in 2020, the 6.4% increase is unlikely to fully address existing needs, let alone the anticipated increased demand due to the current economic crisis.</p> <p>14.5 Staffing costs is one of the largest costs in the delivery of Supporting People services. The increase to the minimum wage in 2024 poses significant challenges for SP-funded providers (since 2020, NMW rates have increased by 39%). While the rising minimum wage is beneficial for workers, it</p>	<p>The Department acknowledges that Supporting People funding provides vital services and that any reduction would have adverse impacts on several of the groups protected by Section 75.</p> <p>The Minister acknowledges the hugely important role the NI Housing Executive delivers in delivering the Supporting People Programme in NI. The Minister provided an additional £4.8m (6.4%) increase in funding for the Supporting People Programme above the 2023-24 Final EQIA Budget position, to help ensure continued viability of the programme.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>exacerbates financial pressure on services in the absence of a matched increase in funding.</p> <p>14.6 Given approximately 50% of those supported by SP have disabilities, any reduction in funding or services will have a clear and adverse impact on this group. Additionally, further analysis is likely to demonstrate that other vulnerable groups—such as women experiencing domestic abuse, ethnic minorities, older people, and young people, particularly those leaving care—will also face significant adverse effects if services are scaled back.</p> <p>14.7 The Supporting People Programme supports nearly 20,000 people every year but it has suffered from chronic underfunding over numerous years, negatively impacting on the standard of service delivery and affecting staff who are on low pay and on poor terms and conditions.</p> <p>The real terms funding cuts that have occurred within the Supporting People programme (over 30% since 2008) should be reversed and improvements made to pay and terms and conditions for staff.</p> <p>Evidence from the Centre for Economic Empowerment 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.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>14.8 The screening for the Supporting People Programme stated that, "...potentially all citizens across all Section 75 groups could benefit from the programme, if eligible." However, the Department does not demonstrate how this will promote equality across all Section 75 areas, but rather outlines how they have been impacted by the 2020 supply shortfalls.</p>	
Urban Regeneration	<p>15.1 The £3.3m Urban Regeneration allocation is unlikely to meet the needs of all towns and villages.</p> <p>In most cases, women's needs are not prioritised in planning, design, and budget for public infrastructure and services. As a result, gender-based inequalities worsen, and many aspects of city life are simply not as safe or accessible for women as they are for men.</p> <p>Stopping investment in urban regeneration projects would likely have adverse impacts on women. The consultation points out that "the retail and hospitality sectors are often predominant in town and city centres" but fails to note that women are more likely to be employed in these sectors. Research shows that women are more likely to be employed in caring, leisure and other services occupations and in sales and customer service occupations.</p> <p>15.2 The regeneration legislation should be reviewed to identify a more substantive role (accompanied by funding mechanisms) for councils, to enable better, local place-based approaches.</p>	<p>With DfC facing a Capital funding gap of £167.3m in 2024-25, 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 2024-25, while working to ensure allocations will be made in the most effective way possible to support areas most in need.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
Voluntary & Community Sector	<p>16.1 Voluntary & Community Sector (VCS) cuts would have catastrophic effect on the ability to deliver much needed services and programmes within communities.</p> <p>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 compensate for literally years of societal costs which would otherwise be incurred.</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 that basis, there were no cuts to these programmes as part of the 2024-25 budget allocations. In fact, Voluntary and Community Sector funding increased by £1.45m on the Department's 2023-24 Final EQIA Budget position funding, to help deal with the pressures faced by the Sector.</p> <p>The Department recognises the important role of our ALBs and their valuable work, particularly in supporting all Section 75 groups, and has sought to minimise the impact on ALBs by holding Resource funding to ALBs at the Department's 2023-24 Final EQIA Budget position funding level. While a flat budget allocation is not ideal and will require cost constraint by Arm's Length Bodies, given the heavily constrained financial position, providing increased allocations to ALBs is not affordable at this time. The Department will continue to work with ALBs to minimise any impact on service delivery.</p>
	<p>16.2 VCS sector cuts will impact on services to children and young people up to 18 years.</p>	
	<p>16.3 The decision to uplift the funding available to the Voluntary and Community Sector by £1.45m in the 24/25 financial year is welcomed. This is a vital source of funding at a local government level, translating in the effective delivery of the Community Support Programme.</p> <p>However, the impact of the uplift across the 11 councils will be minuscule and it is important to recognise that while the current level of funding is protected in a difficult fiscal environment, the pressures on the community and voluntary sector will not be addressed by this slight increase.</p> <p>It is recommended that a much broader, cross-cutting approach is considered when finalising the budget right across the DfC portfolio.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>16.4 Women are more likely than men to have a role as carers, which often requires engagement with multiple public services and also is a key reason why many women do unpaid work, rather than paid work in the labour market (over one third of ‘economically inactive’ women cite this as the main reason). This, in turn, increases the likelihood that women need to rely on benefits and public services.</p> <p>16.5 Services provided by community and voluntary sector organisations focus on prevention and are invaluable to service users and communities. These organisations play a key role in preventing social isolation, engaging people in some of the most disadvantaged areas of Northern Ireland, offering opportunities for education and training that enable them to take up new opportunities, including developing careers.</p> <p>Childcare services, can contribute to identifying children’s support needs, preventing deepening difficulties and potential marginalisation of families. Removal of these services is likely to lead to additional demand on health and social care services, as well as on the benefits system.</p>	<p>Decisions on the introduction of any new mitigation package will need to be assessed in the current constrained financial climate ensuring that budgets remain sustainable over the coming years. Outline costs for new welfare mitigations were provided to the Executive at part of the Budget 2025-26 setting process.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>16.6 The voluntary and community sector has been severely under resourced for a number of years and the proposed increase in funding, while opportune, does not meet the needs of the sector.</p> <p>It cannot be overstated how government bodies are reliant on the community and voluntary sector for promotion, delivery and bridging the gaps in Government funding and services. The systematic reduction of resources in the sector will have the long-term effect of dismantling this vital sector.</p> <p>Already legacy issues are being identified as the next generation of potential workers do not want to enter a field where there is such low pay, job insecurity, extended and unpaid hours, red tape, short turnaround or crisis funding. The reduction of the CVS will impact on all services delivered through government. It is imperative that these services are maintained and improved as without them the impact on all section 75 groupings would be severe, particularly for women, single parents, older people, those with disability, those with complex needs and BAME groups.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>16.7 The proposed budget cuts will have a profound impact on mental health services, particularly for those who are already struggling with the pressures of poverty. Poverty and mental health are inextricably linked, with financial hardship being both a cause and a consequence of poor mental health.</p> <p>Reductions in funding for mental health services, including counselling, crisis intervention, and community-based support, will lead to an increase in mental health crises and a greater demand for emergency services. The Samaritans, who provide vital support to individuals experiencing suicidal thoughts or emotional distress, are likely to see an increase in demand as a result of these cuts. However, without adequate funding, they and other mental health organisations may struggle to meet this demand, leaving many people without the support they need at a critical time.</p> <p>16.8 Many services provided by the voluntary and community sector are for those in most need, and evidence confirms that they are facing an unprecedented level of demand in Northern Ireland.</p> <p>The Department did not identify any potential adverse or differential impacts with regards to the uplift to the voluntary and community sector funding. We would encourage the Department to continue to ensure that no Section 75 group is impacted negatively during the implementation and allocation of the funding in year.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>16.9 NSPCC expressed concern about the lack of recognition of the cumulative impact of budgetary pressures across providers in health and social care and voluntary and community sectors through the DoH and DE budget consultations carried out last year. Unfortunately, the Department of Health has made the decision to maintain this funding cut at this 50% reduction for 2024-25. So, while the additional Department for Communities funding is welcome, it must be taken into consideration against the wider financial climate faced by the voluntary and community sector in Northern Ireland.</p> <p>16.10 If the proposals are progressed, the Department should put in place effective measures or alternatives steps to mitigate against any negative equality impact on the health and wellbeing of deaf children and young people.</p> <p>16.11 The increased funding is insufficient to meet needs of a sector that has been severely under-resourced for years. The reliance of government bodies on the community and voluntary sector to fill gaps in service provision cannot be overstated. Continued underfunding will dismantle this vital sector, with long-term consequences, including the loss of a future workforce due to low pay, job insecurity, and unsustainable working conditions.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>16.12 The impact of the constrained budget on the Community and Voluntary sector (CVS) and local government have been challenging, with staff reductions in local government and uncertainty and insecurity for posts in the CVS.</p> <p>At the height of the Covid pandemic, all government sectors were heavily reliant on the CVS delivering vital programmes and services within Communities. The impact of budget reductions, level or inadequate increases in funding, will inevitably flow from government and the CVS to residents and the most vulnerable within our society.</p> <p>16.13 The increase in the funding that will resource the Neighbourhood Renewal Areas is welcomed. However, Neighbourhood Renewal has been severely under resourced for twenty years and the proposed increase in funding falls far short of meeting the needs of the Community sector.</p> <p>16.14 The impact on community organisations currently funded under Neighbourhood Renewal has been challenging and has added to the insecurity and uncertainty particularly on those who are delivering much needed services and, at times, lifesaving support.</p> <p>There is a gap in the EQIA data linking S75 groups and areas of multiple deprivation. Section 75 impacts are multiplied when spatial inequality is factored in. Many in the Section 75 groups and those living in the most deprived</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>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/individuals.</p> <p>16.15 For many groups, the 5% non-recurrent increase does not cover the rise in the minimum wage of 9.8% leaving groups to fund the shortfall from their own resources which is only adding to the financial strain these organisations are facing due to rise in heat and light costs with no additional funding from the Department to cover these costs.</p> <p>The non-recurrent nature of the increase in funding is also extremely worrying as groups do not know if the 5% will be offered in future years.</p> <p>16.16 Volunteering is a pathway to employment, health & wellbeing and social inclusion.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>16.17 There is concern that the decrease in local councils' budgets would, in turn, cause a decrease in the funding that local councils give to the community and voluntary sector, negating any benefit from increasing the community and voluntary budget.</p> <p>The easy read version was very helpful in ensuring that the consultation process was accessible.</p> <p>16.18 Impact on investment in volunteering should continue as a priority. New Decade New Approach 2020 aims to improve wellbeing as tackling disadvantage and drive economy growth on the basis of objective need.</p> <p>Local Volunteer Centres support grass roots organisations across all Section 75 groups.</p> <p>16.19 The sector is currently experiencing significant issues in recruiting and retaining staff due to low pay and lack of security, whilst having to comply with disproportionate bureaucracy.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>16.20 DfC has a key role in funding the Voluntary and Community Sector (VCS). The way that this sector has been treated for a number of years undermines any sense of partnership working and does not demonstrate appropriate value of the important role of the sector in providing a wide range of the most critical services to some of our most disadvantaged communities, families and children.</p> <p>VCS services are often delivered on very limited budgets, depending on the commitment of staff and organisations to obtain resources from charitable sources as well as government.</p> <p>Children and young people account for a significant proportion of the local charitable sector, with 48% providing services for children aged 5-13, 20% in support of preschool children aged 0-5 and 44% in support of young people aged 14-25.</p> <p>Within the ‘sexual orientation’ category, intersectionality of children and young people who are LGBTQIA+ has not been fully considered given the data only outlines those from the 2021 Census who are 16 and over.</p> <p>16.21 We urge the Department to conduct further analysis of the operational impact of a flat budget allocation on the office of the Commissioner for Older People and its ability to effectively advocate for older people’s rights.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>16.22 There is concern that the small £1.45m budget increase will not go far enough towards relieving the demand on services or allowing VCS organisations to become more sustainable.</p> <p>The funding landscape facing the age sector is inconsistent and not stable or sustainable in the short, medium or long term. Many of the age sector networks, and the local groups they support, do not receive funding and have no staff. Some receive programme funds through a range of independent funders, while some have staff, programme costs and premises, resourced through a patchwork of short term and ad hoc funding arrangements with public bodies such as councils, health and social care trusts, and the Public Health Agency.</p> <p>The Department are urged to ensure that there is sufficient funding for older people’s VCS organisations to improve the sustainability of this currently precarious sector.</p> <p>16.23 ABC Council's 'Community, Voluntary and Social Enterprise Sector Panel' is central to the delivery of the community plan. These sectors play a vital role in responding to crisis, delivering services and strengthening communities. Funding has been an issue for these sectors over the past years and this impacts some organisations’ ability to take part in strategic collaboration across the borough.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
Welfare Mitigations	<p>17.1 Carers NI is extremely disappointed that no funding has been allocated in the Department's budget for 2024/2025 for a Carer's Allowance Recognition Payment. 28% of unpaid carers are currently living in poverty, resorting to cutting back on food, essentials and mounting up debts. Delivering a social security benefit which prevents them living in financial hardship should be a priority.</p>	<p>Decisions on the introduction of any new mitigation package will need to be assessed in the current constrained financial climate ensuring that budgets remain sustainable over the coming years. Outline costs for new welfare mitigations were provided to the Executive at part of the Budget 2025-26 setting process.</p>
	<p>17.2 The extension of the Department's welfare reform mitigations, which protect against the impacts of the Bedroom Tax and Benefit Cap, are welcomed. However, these measures alone will be insufficient to address the root causes of poverty.</p> <p>The decision not to mitigate the impacts of the Universal Credit two-child limit will serve to worsen rates of poverty in Northern Ireland. This issue has not been acknowledged in the EQIA. A failure to mitigate the two-child limit will have impacts for children, women, people with dependents and people from a minoritised ethnic background.</p>	
	<p>17.3 Households belonging to Black, Pakistani and Bangladeshi communities are more likely to have dependent children and larger families, making them more susceptible to reductions in Universal Credit."</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>17.4 The Department has not outlined plans to extend the current Welfare Mitigations which are due to stop at the end of March 2025. It is imperative that welfare mitigations are prioritised by the Department to ensure that those receiving the support continue to do so, and measures are taken to prevent further increases in poverty levels.</p> <p>17.5 Financial assistance, in the form of a repayable loan, can be provided to new claimants of UC, to mitigate against the five-week wait for the first payment. However, this reduces the payments the claimant receives as they repay this over a 24-month period, essentially meaning the claimant begins their claim in debt.</p>	<p>The Executive's Draft Budget 2025-26 proposes funding to support the existing welfare mitigation payments until 31 March 2026.</p> <p>The Department's Universal Credit Contingency Fund is funding available to support those transitioning to Universal Credit. This grant does not need repaid.</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>17.6 The two-child policy, and its unfairness and unsuitability, has been particularly prevalent across Northern Ireland as the average family size is statistically larger than that of the rest of the UK, with 21.4% of families in Northern Ireland having three or more children in comparison to 14.7% in Britain. As children in Northern Ireland are at a greater risk of living in poverty in comparison to the general population, it is apparent this policy has damaging effects. The policy is out of step with public opinion with 64% of people believe it to be very unfair or unfair, while 60% of people want to see it abolished.</p>	

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
Other / General Budget	<p>18.1 Concern that a thorough assessment of the impacts of the budget allocation on older people was lacking throughout the EQIA.</p> <p>Data sources utilised in the Department's discussions of the likely impact of budget decisions on 'age' as a Section 75 category predominantly focused on younger age categories and there was limited analysis of the impacts for older people.</p>	<p>The Department delivers a diverse range of services across all Section 75 Groups. The Department welcomes the responses received on the Budget 2024-25 EQIA and will aim to take on board all data source omissions referenced, in preparation of any future Budget Policies.</p>
	<p>18.2 COPNI recognises that responsibility for the inadequacy of the Department's budget, as a whole, lies outside the DfC. Evidently, the budget allocated to the Department inhibits the part it can play in planning for, and addressing the needs of, an ageing population.</p>	<p>The Department of Finance have undertaken a consultation on the Executive's Draft 2025-26 Budget.</p>
	<p>18.3 It is disappointing to see the absence of any reference to significant independent reviews that have considered functions of the Department for Communities, in particular the Report from the Anti-Poverty Strategy Expert Advisory Panel, the Welfare Mitigations Review and the Discretionary Support Review.</p>	<p>The Department delivers a diverse range of services across all Section 75 Group. The Department welcomes the responses</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>18.4 One of the most significant omissions in the EQIA is the lack of consideration for the cumulative impact of budget reductions across different government departments. The Department for Communities is not operating in isolation; its budget interacts with and is interdependent on the budgets of other departments, including Health, Education, and Justice. The cumulative effect of simultaneous budget cuts across these areas will have far-reaching and disproportionately negative consequences for the most vulnerable groups in society.</p>	<p>received on the Budget 2024-25 EQIA and will aim to take on board all data source omissions referenced, in preparation of any future Budget Policies.</p> <p>The Department of Finance have undertaken a consultation on the Executive's Draft 2025-26 Budget.</p>
	<p>18.5 The timing of the current process is such that many of the decisions in the EQIA have already been taken.</p>	
	<p>18.6 It is recommended that the Section 75 EQIA processes for the allocation of the Department's budget are better aligned to the overall budgetary processes in NI, which are by nature ongoing and cyclical.</p> <p>In absence of this alignment, the Department is consulting on an EQIA where the EQIA states that '...initial decisions have already been taken' by the Minister and there appears to be limited opportunity for consultees to impact on the considerations of decision makers, or the development of alternative policies and/or mitigation measures.</p>	<p>Given that over 85% of the Department's total Resource requirement in 2024-25 relates to areas of contractual, inescapable, and statutory spend, only the remaining 15% of the resource budget can be classified as discretionary with potential for reduction. However, a proportion of the discretionary funding requirement relates to other statutory and contractual obligations related to Councils, Arm's Length Bodies, and voluntary bodies. Therefore, even with a</p>

**Department for Communities – Budget 2024-25 Equality Impact Assessment
Consultation Response Summary**

Key Theme	Summary Comment / Points Raised	Response
	<p>18.7 Given the Department has assessed impacts on all Section 75 groups, the EQIA should also indicate the extent of the potential impacts i.e. major or minor, to assist prioritisation of mitigating actions.</p>	<p>continued focus on improving the efficiency and effectiveness of existing spending, there is limited scope to reduce funding over the budget period to help mitigate any adverse impacts on Section 75 categories. As such, it was necessary for the Department to provide initial allocations to ALBs, funded sectors, Programmes and areas of statutory spend.</p>