

# **BUDGET 2023-24**

## **Draft Equality Impact Assessment Stage 1 Outcome Report**

**June 2023**

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## **1. About this document**

- 1.1. This document presents the findings from the first stage of the consultation (up to and including 7 June 2023) on the Department for Communities proposed Budget 2023-24 allocations.

## **2. Background**

- 2.1. The process of setting Budgets can in some cases have an unintentionally greater impact on some specific Section 75 groups than others, for example, on males, females, young people or older people, etc. In allocating Budgets the Department aims to avoid any adverse impacts and where possible, action will be taken to mitigate against specific adverse impacts.
- 2.2. To comply with its Section 75 obligations, the Department for Communities (hereinafter referred to as 'the Department') following Equality Screening carried out an EQIA on the Secretary of State's Budget 2023-24 allocation to the Department.
- 2.3. The Secretary of State's Budget 2023-24 was announced on 27 April 2023. The Budget provides Resource and Capital investment funding allocations to departments for the 2023-24 financial year.
- 2.4. In line with the Secretary of State's announcement of the Budget 2023-24, departments were required to screen proposed funding allocations in line with equality commission guidance and if an EQIA was required, this was to be published to support the consultation process.
- 2.5. The public consultation period on the Department's Budget 2023-24 allocations runs from 10 May to 2 August, however Stage 1 (i.e. the initial 4 weeks of consultation) ended on 7 June to allow decisions to be made on final allocations to support the Department in living within its 2023-24 Budget Settlement.

- 2.6. This report has been produced to highlight the comments received during Stage 1 of the consultation period and to outline the Department's next steps.
- 2.7. The Department would like to take this opportunity to thank all those who participated in Stage 1 of the consultation. The invaluable input and expertise received through responses will help to inform and shape the Department's final Budget 2023-24 allocations.

### 3. Consultation

- 3.1. The Department's Stage 1 Budget Allocations 2023-24 EQIA issued for consultation on 10 May 2023 and ran for a 4 week period, closing on 7 June 2023. All those recorded in the Department's Section 75 consultation list received a letter or email notification informing them of the consultation arrangements.
- 3.2. The consultation document was made available on the Department's website and promoted on social media through the DfC Twitter page. The documents were also available in hard copy or in different formats including large print, sign language video or translated copies for accessibility.
- 3.3. A full copy of the Department's Budget 2023-24 Draft EQIA can be accessed on the Department's website:  
<https://www.communities-ni.gov.uk/consultations/consultation-department-communities-budget-2023-24-allocations>

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

1. Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 6 of the EQIA consultation document? If so, what are they and can you provide details?
2. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in section 7 of the EQIA Consultation document? If so, what are they?
3. Please state what action you think could be taken to reduce or eliminate any adverse impacts in allocation of the Department's budget.

4. Are there any other comments you would like to make in regard to this pro forma or the consultation process generally?

## 4. Responses Received for Stage 1

4.1. A total of 185 responses were received. This included 90 online survey responses (13 from organisations and 77 from private individuals), 95 email responses (75 from organisations and 20 from private individuals). No postal responses were received.

4.2. Details of the organisations responding include:

- Action Mental Health
- Advice NI
- Age NI Apex Ardoyne Youth Enterprises Ard's
- Armagh City, Banbridge and Craigavon Borough Council
- Arts Council Northern Ireland
- Belfast City Council
- Carrick Hill Community Centre
- Causeway Coast and Glens Borough Council
- Charity Commission NI
- Chartered Institute of Housing
- Cinemagic
- Cliftonville Community Regeneration Forum
- Comhaltas Ceoltóirí Éireann
- Commissioner for Older People NI
- Confederation of Community Groups
- Co-operation Ireland
- Creative Learning Centres Deaf Women's Group NI Derry and Strabane District Council
- Derry and Strabane Labour Market Partnership
- Disability Action
- Disability Sport NI
- East Side Partnership Response
- Equality NI Equity NI
- Falls Community Council
- Fermanagh and Omagh District Council

- Foras na Gaeilge
- Glen Parent and Youth Group
- Glenview Community Centre
- Harryville Mens Shed
- Homeless Connect Housing Rights J
- Joseph Rowntree Foundation
- Kilcooley Women's Centre Law Centre NI
- Lenadoon Community Forum
- Lenadoon Women's Group
- Libraries NI
- Ligoniel Village Neighbourhood Renewal Partnership
- Lisburn & Castlereagh City Council
- Lower Oldpark Community Association
- MACS Supporting Children and Young People
- MencapMid
- East Antrim Manufacturing Task force
- Mid and East Antrim Labour Market Partnership
- Mid Ulster District Council & Mid Ulster Labour Market Partnership
- Musicians Union National
- Museums NI
- Newry, Mourne and Down District Council
- NI Commissioner for Children & Young People
- NI Federation of Housing Associations NI GVA
- NI Housing Executive
- NI Screen
- NI Sports Forum
- NI Union of Supported Employment
- NI Women's Budget Group
- No Alibis Bookstore Outer West
- Neighbourhood Partnership Pathway Fund
- Praxis Care
- Royal National Institute Deaf People



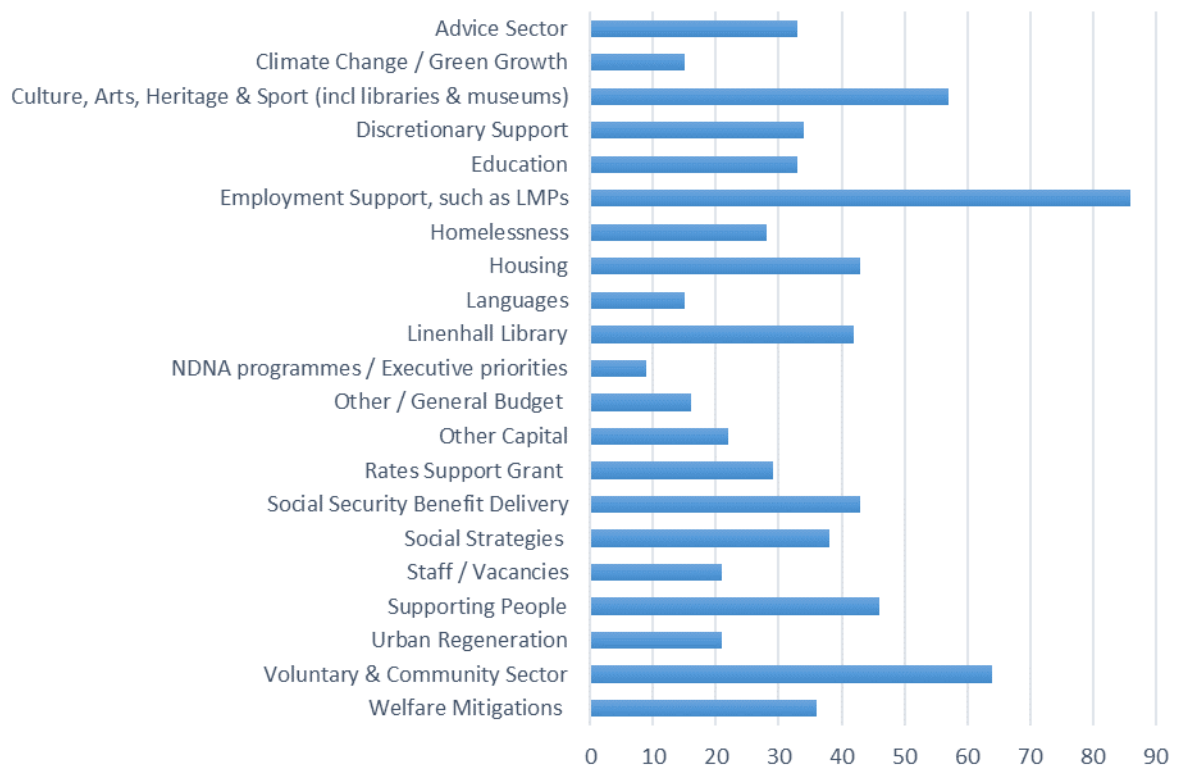
- Rural Community Network
- Sinn Féin
- Society of Authors
- St Joseph's Centre for the Deaf
- The Linen Hall
- The Rainbow Project
- The Tenants Associations of Sheltered Dwellings
- The Ulster Society for Promoting the Education of the Deaf and the Blind
- Triax Neighbourhood Partnership
- Ulster Rugby
- Unite the Union
- Volunteer Now
- Waterside Neighbourhood Partnership
- Waterside Women's Centre
- West Belfast Partnership Board
- Women's Policy Group NI
- Women's Regional Consortium
- Womens Centre Derry
- Women's Platform

## 5. Budget 2023-24 Stage 1 Consultation Response Summary

5.1. As the proposed Budget 2023-24 allocations span the diverse functions of the Department, respondents had differing priorities with a wide range of views expressed. The views of respondents have been summarised into 21 key themes.

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

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



5.3. All Stage 1 consultation responses and feedback received has been analysed with the key issues being summarised and presented with the Department's response at **Appendix A**.

5.4. For the most part respondents agreed with the inequalities identified and the Section 75 categories affected in the draft EQIA. The Stage 1 consultation

responses received were useful in highlighting three<sup>1</sup> further Section 75 Groups potentially impacted by the Department's proposed 2023-24 Budget allocations and the Department's Final EQIA will be amended to include these groups.

5.5. Following Stage 1 of the consultation, the Department's proposed Budget 2023-24 allocations are considered as having potential for adverse impact on the following Section 75 Groups –

- i. people of different ages;
- ii. men and women generally;
- iii. people with or without a disability;
- iv. people with or without dependants;
- v. people with different sexual orientations;
- vi. people from different racial groups;
- vii. people with different religious beliefs;
- viii. People with different marital status; and
- ix. People with different political opinions.

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<sup>1</sup> The three additions include, people with different sexual orientations; people with different marital status; and people with different political opinions.

## 6. Next Steps

- 6.1. In finalising the 2023-24 Budget allocations, the Department will seek to ensure that allocations are applied as far as possible in a manner that does not disproportionately or adversely affect one Section 75 category, over another.
- 6.2. The impact of the Secretary of State's Budget 2023-24 is challenging, with the Department facing a very constrained financial position in 2023-24. In the context of delivering public services with constrained allocations, the Department will continue to consider options to live within its 2023-24 allocation whilst seeking to maintain effective public service delivery. This includes not filling vacancies (with the exception of a very small number of critical posts), constantly monitoring spend throughout the year, and considering how efficiencies can be realised across the Department, its funded ALBs and programmes of work. This will be challenging given over 90% of the Department's Resource budget is required to meet protected, contractual, inescapable, and statutory obligations.
- 6.3. In developing options to live within the 2023-24 Budget allocation, consideration has been given to how any adverse impacts on Section 75 groups can be reduced. It will however be difficult to mitigate the potential adverse impacts anticipated, given the scale of additional funding the Department requires in 2023-24.
- 6.4. The Department will consider the need for any further mitigating actions following responses received during Stage 2 of the consultation. Promotion of equality of opportunity and the protection of services to vulnerable groups will be a key consideration in the Department's final Budget allocation decisions.
- 6.5. The Department continues to consider and develop plans to ensure the Department can continue to deliver services in 2023-24, whilst living within its Budget settlement.
- 6.6. **Decisions on the Department's 2023-24 Budget allocations following Stage 1 of this EQIA, will be separately published on the Department's website.**

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

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

Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
Theme	Summary Comment / Points Raised		Response
	<p>2.4 A standstill budget to the Arts Council NI allocation is a real terms cut. We need more investment, not less to enable the sector to provide these valuable contributions and more to Northern Ireland's communities: for social inclusion, enrichment of life quality and local regeneration for physical and mental health for enhancing education and learning ability for the economy for tourism for engaging young people and creating confidence and motivation for skills creation and transferability and increasing employment chances for Northern Ireland's reputation. A petition, launched by Equity gained widespread exposure across Northern Ireland, with dozens of theatres and performing arts organisations and the Musicians Union, BECTU and the Society of Authors expressing support. The petition reached 12,500 signatures to send this strong message to the Department. Our communities want more investment in the arts.</p> <p>2.5 Cinemagic has established a worldwide reputation for excellence in youth film programming and in its creative and innovative approach to tackling social exclusion through the medium of film. Cinemagic engages with 40,000 young people each year. It educates the next generation of filmmakers, from camera operators and sound engineers to actors, writers and directors, with a particular focus on inclusion and those who might face barriers entering the industry. Funding cuts put all these initiatives in jeopardy. Cinemagic provided numerous testimonies from a wide range of people on the benefits of the organisation and its festival.</p> <p>2.6 The positive return which sport generates on social &amp; health benefits supports all communities and S75 groups. Cuts would impact on sport &amp; clubs seeking to upgrade facilities to widen S75 participation. Ultimately, with a reduction in sports programmes and investment in capital projects, less people will be able</p>		

Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
Theme	Summary Comment / Points Raised	Response	
	<p>to access sport, and the positive interventions that it makes to health and mental health. This will lead to worse outcomes for those individuals, and invariably, Section 75 and other marginalised groups will be most impacted as a result.</p> <p>2.7 Reductions to arts funding will reduce the ability of EastSide Arts to develop participatory arts programmes which engage with many of the Sections 75 groups. This will have a detrimental effect on those with dependants, young and older people all of whom benefit in terms of improved wellbeing through arts engagement.</p> <p>2.8 In terms of access to cultural and sporting activities, the isolation faced by individuals with sensory loss is well documented leading to poorer mental and physical health outcomes. It is therefore essential that in streamlining budgets, initiatives designed to support these groups is maintained, including the additional capacity and cost required to deliver information about initiatives and the services themselves to ensure that they are accessible in terms not just of buildings but in terms of language and communication support and information.</p> <p>2.9 Arts Council Northern Ireland supports: festivals open to all S75 groups; A result of funding cuts will lead to a loss of employment and potentially community arts centres/programmes and festivals catering for all. If funding is reduced the people who will feel this the most are those who cannot afford higher ticket prices – a likely income of reduced funding. Fewer productions or closures of buildings provides less access to the arts to local citizens who may not be able to travel further distances for the same access. Our LGBTQI+ communities and disabled members of the community deserve the positive</p>		



Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
Theme	Summary Comment / Points Raised		Response
	<p>messages that arts can provide, as well as the access to employment and opportunities. Our talented aspiring artists are already leaving or considering leaving Northern Ireland due to lack of educational and work opportunities and the appalling lack of parity of arts funding in comparison with the rest of the UK and Eire. Those seeking careers in the arts from all S75 backgrounds are likely to consider better funded, more hospitable, more diverse opportunities with better access elsewhere.</p> <p>2.10 Women, people with disabilities, people with dependants, black lives in music are all underrepresented and will be further disadvantaged if funding is cut. money invested in the arts has a high return on investment, so to cut funding still further is not an economically prudent thing to do, even without considering the impact on the arts themselves. The music industry contributes millions of pounds to the economy of Northern Ireland and underinvestment in funding for ACNI and capital spend on venues and facilities will stifle growth in a sector that the Chancellor of the Exchequer has said is a priority. Any jobs lost, and any venues forced to close, will take years to reverse. "</p> <p>2.11 Any reduction on service will have a detrimental impact on areas of deprivation. Multiple Cuts from all departments will impact on those most vulnerable in society including the communities that reside in Areas of Multiple Deprivation (as defined by NISRA). This approach runs contrary to the aims and objectives of the Department’s People and Place Strategy.</p> <p>2.12 Social inclusion, engagement in arts, sport and culture, extremely detrimental to young people for cuts in this area.</p>		

Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
	Theme	Summary Comment / Points Raised	Response
		<p>2.13 The impact of the budget allocation for 2023/24 for National Museums NI is such that Northern Ireland would no longer have a national museums service. This will require public consultation, legislative change and a major redundancy programme. Given the historical funding position, the proposed budget allocation for National Museums NI for 2023/24 will jeopardise the very existence of the organisation; Any substantial change in service will take time and savings will not be realised in the short term; The loss of the national museum service will have a significant negative effect on the cultural health and reputation of Northern Ireland; Northern Ireland’s global reputation as a place to visit, live and invest will be negatively affected. There will be substantial negative impact on Section 75 groups who currently benefit significantly from engagement with their national museum service.</p> <p>2.14 The reduction in funding proposed by the Department will require cuts to core provision and this will have negative impacts across the entirety of the library network. Those negative impacts reach far beyond libraries causing long-term harm and damage at the intersection of library services with other priority areas such as education, health, social inclusion and societal well-being. There will be reduced capacity to facilitate participation in regional, national and international initiatives, including Good Relations Week, Empathy Day, Positive Ageing Month, Age Friendly Initiatives, Refugee Week, Celebrating Books and Reading, including the annual BBC NI Book Week and rural and urban Community Festival.</p> <p>2.15 The reduced funding of the library service will have disproportionate impacts specific impacts for the following Section 75 categories:</p> <ul style="list-style-type: none"> <li>• Racial Group</li> <li>• Age</li> </ul>	

Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
Theme	Summary Comment / Points Raised		Response
	<ul style="list-style-type: none"> <li>• Disability</li> <li>• Dependents</li> </ul> <p>There is limited information in the EQIA on adverse impacts relating to Section 75 groups who specifically use libraries.</p> <p>2.16 Belfast CC concerned with reduction in funding for Arts, Libraries, Museums, Sport.</p> <p>2.17 Reductions in investment in sport would also impact on the ability of all people with a learning disability to live full and active lives and to be fully included in society.</p> <p>2.18 In 2023/24, eleven arts organisations were recommended for rejection who would have received £536,010, AFP funding. Six of the rejected organisations are classified as small scale, that is their total annual income generation was less than £400k; three are classified as medium-scale (generating between £400k and £800k) and two large-scale (generating more than £800k in income). Small scale organisations fulfil a unique function within the NI arts and culture sector, working flexibly with artists, local communities (as participants and audiences) in different community settings to build platforms for civic interests and participation. By doing so they help strengthen inclusion and diversity within wider NI society. This disproportionate impact on small scale arts organisations will compromise their ability to do this forthwith, particularly within the context of Section 75.</p>		

Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
Theme	Summary Comment / Points Raised		Response
	2.19	The 5% cut on the Arts Council's grant-in-aid allocation will have a direct impact on front-line arts organisations and their ability to deliver activity that addresses the needs of Section 75 groups.	
	2.20	The need to protect front line services through our primary funding programme (Annual Funding Programme), will have implications for funding levels in other programme areas closely linked to departmental and government priorities. Reduced government funding will impact the Arts Council's ability to deliver targeted programmes aimed at reaching and engaging Section 75 groups. Diminishing investment in the arts means fewer Section 75 benefits can be attributed to government investment. The continued lack of investment in Northern Ireland's arts infrastructure has compromised the ability of venues to meet access requirements, in particular for d/deaf, disabled and neurodivergent audiences.	
	2.21	Thought should be given to creating community libraries where members of the community could access reading material. If there is closures of libraries books could be given to community groups and members of the community could access books at community groups premises. Potentially the most drastic impact will be in rural areas. The creation of community libraries could also potentially help to reduce social isolation and reduce depression.	
	2.22	This is a cross cutting strategy contributing to the long-term health and well-being of the population. During the pandemic and the closure of sporting activities there was a huge increase in people walking. If cuts are going to take place there should be an emphasis through media and agencies to encourage people to walk more. The benefits to physical and mental health are well documented and this should be encouraged.	

Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
Theme	Summary Comment / Points Raised		Response
	<p>2.23 Potential Impact of Proposals on Section 75 groups is hugely underestimated. With a reduction in sports programmes and investment in capital projects, <b>less people will be able to access sport, and the positive interventions that it makes to health and mental health</b>. This will lead to worse outcomes for those individuals, and invariably, Section 75 and other marginalised groups will be most impacted as a result. It will also have a negative knock-on impact for other aspects of what DfC are tasked to fund.</p> <p>In addition, <b>Sports funding promotes good relations</b> between people with different religious beliefs, different political opinions or from different racial groups and “promotes <b>positive attitudes</b> towards disabled people and encourage participation by disabled people in public life.</p> <p>2.24 <b>Libraries NI</b> - Libraries can have <b>significant impact on health and social wellbeing</b> not only through the services they provide but as <b>warm spaces</b> which is particularly important in a cost-of-living crisis that impacts particularly on those living in deprived areas, those who are socially isolated and those who struggle to afford their winter fuel payments. Any reduction in Libraries NI opening hours will have additional impacts on Section 75 groups in rural areas who use rural Libraries as meeting points and to access the internet using Public Access Terminals.</p> <p>2.25 Impact of arts cuts on S75 groups provided, including:</p> <p>Arts Council NI – A five-year strategic framework for developing the arts 2019-2024 - 51% of Arts Council funding goes to the most deprived areas of</p>		

Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
Theme	Summary Comment / Points Raised		Response
	<p>Northern Ireland, helping to deliver social change, economic prosperity and build a strong and a shared community.</p> <p>UNESCO Cultural organizations and the promotion of the diversity of cultural expressions, June 2023 (<a href="https://www.unesco.org/creativity/sites/default/files/medias/fichiers/2023/06/3-Policy_Perspectives_Spectacles_EN-web2.pdf">https://www.unesco.org/creativity/sites/default/files/medias/fichiers/2023/06/3-Policy_Perspectives_Spectacles_EN-web2.pdf</a>)</p> <p>ACNI Freelance Practitioner Research Report 2021 - demographic of the freelance working community = majority female &amp; 41% “working class”. Lack of diversity and accessibility in some sectors.</p> <p><b><u>Adverse Impacts</u></b> - Creative Industries Economic Estimates 2021 document highlights that the Gross Value Added (GVA) for the creative industries was £1,311 million in 2019, representing 3.1% of Northern Ireland’s total GVA. <b>Each penny invested in the Arts brings money back into our communities. Creative industries provide employment to and benefits people from every section of society</b>, regardless of age, race, political persuasion, gender, LGBTQI+ status, family environment etc.</p> <p>Reduction in funding will affect health and well-being, community and S75 group inclusion, employment, accessibility (through price rises and venue/programme closures).</p> <p>2.26 DfC data is not explicit about which Section 75 categories are impacted. <b>Audit of Inequalities</b> subsection on Sport <b>doesn't have a direct listing of children and young people</b>. Less young people are able to participate in sport due to the cost of living crisis. Likewise those from Areas of High Social</p>		

Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
Theme	Summary Comment / Points Raised		Response
	<p>Need and those with a disability. Specific reference and evidence should be given on the impact of cuts to these groups.</p> <p><b>Sport NI</b> - Reduction of funding for community sports programmes will have adverse impacts on all S75 groups, further compounding post-covid impacts on wellbeing. It is also worth noting the <b>wider community benefits of community sports programmes for community resilience, mental wellbeing, strengthening employability, alternative youth diversionary activity, social connections and groups’ ability to leverage in additional funding to their community</b>. The publication of the Ending Violence Against women and Girls Strategy will be impacted by any reduction in funding.</p> <p>The <b>Sport and recreation sector has improved impacts on social return, community cohesion and economic impacts for NI</b>, evidenced through reports such as the Economic Return on Outdoor recreation. Reducing investment will have adverse impacts in the immediate short term and longer term.</p> <p>2.27 <b>People with different Sexual Orientations</b>. Many LGBTQI+ people engage with specific arts and culture organisations, which provide safe and creative spaces for members of this community. A reduction in funding to these organisations risks potential closures or changes to working practicalities. DfC supported work tends to provide more targeted engagement with members of the community with protected characteristics than other music and cultural programmes.</p>		

Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
Theme	Summary Comment / Points Raised		Response
	<p><b>Affordability Risk</b> - Raising prices may be the only viable response for these organisations to fill the budget gap created by the proposed cuts, which would <b>adversely impact on poorer members</b> of our community.</p> <p>DfC provides funding, through NI Screen, to Film Culture organisations that engage diverse communities and promote social cohesion, provide training and employability support.</p> <p>2.28 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 &amp; 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>2.29 Do not withdraw or cut funding to Linen Hall Library as it provides a mechanism for talks, book launches, poetry readings and exhibitions. The Library is woven into the fabric of Northern Ireland's cultural heritage and that cannot be lost.</p> <p>2.30 The Linen Hall Library is unique and internationally acclaimed. It's archive material on the political conflict in Northern Ireland is of historical importance.</p> <p>The Library, in its central location in Belfast, is regarded with affection and respect by members of both communities in the city. With its links to the</p>		<p>Funding for Covid Recovery Schemes ceased in the 2021-22 financial year when no specific funding was provided to the Department.</p> <p>With DfC facing a Resource funding gap of £111.2m (15.5%) in 2023-24, the Department acknowledges that managing a Resource pressure of this magnitude will undoubtedly have a significant and adverse impact on the Department's ability to meet demand for public services in 2023-24.</p> <p>The Department recognises and appreciates the contribution of our arts, creative industries,</p>



Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
	Theme	Summary Comment / Points Raised	Response
		<p>history of Belfast, the Linen Hall Library is now a tourist attraction in itself, as well as a reminder of the best aspects of Belfast's history.</p> <p>2.31 Linen Hall Library is, in effect, a museum with significant records of historical, social and cultural importance and does indeed, through access to its collections and its events programme, do a lot to promote good relations. Further it enables a wide variety of people to access different political opinions through its various activities.</p> <p>2.32 I am deeply concerned at the potential scale of cuts to funding to the Linen Hall Library. This is one of Northern Ireland's longest serving and most venerable institutions, providing a unique public service in Northern Ireland which isn't replicated in any other museum or library locally. I believe the potential cuts that may be passed on to it could be devastating and undermine even its viability. I urge you to do all that you can to protect funding for the body.</p> <p>2.33 The Linen Hall Library is widely recognised as a neutral space. It is a meeting place and venue for community groups including ethnic minorities and prisoner groups. It has a wide-ranging cultural programme with events that celebrate our cultural heritage and promote good relations.</p> <p>Any disproportionate reduction in the Library's funding would, in my view, be a failure to have due regard to the desirability of promoting good relations.</p> <p>The Linen Hall's Northern Ireland Political Collection contains around 350,000 items from the 'Troubles' and is the only archive in existence collected during a conflict and not retrospectively. It is the largest NI political collection in the</p>	<p>museums and libraries to our communities, along with the economic, health and education benefits thriving sectors bring. While funding will be reduced in these areas, the Department will continue to support these sectors within the limited resources available in the 2023-24 Budget.</p>

Department for Communities – Budget 2023-24 EQIA Consultation Response Summary			
	Theme	Summary Comment / Points Raised	Response
		<p>world. The Library has an extensive Irish Language Collection and holds the Gibson Collection, which is the largest Robert Burns collection in the UK outside Edinburgh.</p> <p>The Library holds many literary archives, ranging from those of Louis MacNeice to Rosemary Jenkinson and Brian McGilloway and amongst its collections is a first edition of James Joyce's Ulysses.</p> <p>The Library has extensive resources to support genealogy and the study of family histories, attracting researchers locally and from around the world.</p> <p>The Linen Hall Library has a wide-ranging cultural programme including book clubs and literary events. These celebrate our shared cultural heritage and promote good relations.</p> <p>The Library's Theatre and Performing Arts archive is the primary source for theatrical material from Northern Ireland. It houses archives of playwrights as well as ground-breaking local theatre companies such as Charabanc and Tinderbox.</p> <p>Honorary Members of the Library include international figures from the literary, musical and theatrical worlds.</p> <p>The Linen Hall Library's present location is a listed Victorian linen warehouse, which it has occupied since 1892. The Library is the embodiment of the value of our built heritage.</p>	

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	<p>The indicated cut in the library’s budget would have an adverse impact on the Linen Hall’s ability to give people access to different political opinions, not least in its archives, the supreme example being the Northern Ireland Political Collection.</p> <p>2.34 Mitigations should be made against current proposals for steep reductions in funding to the Linen Hall Library as it provides a safe haven for S75 Groups including currently discriminated-against and subject to violence LGBTQ+ and trans individuals; and the elderly.</p> <p>2.35 The Library is proud of its neutral reputation, its openness to all and its embracement of diversity. It realises the importance of outreach to communities and making the Library’s shared space and unique and important collections open and accessible to everyone.</p> <p>Access to the NI Political Collection in the Linen Hall and the ability for people to access different political opinion through the archive demonstrates that there would be a detrimental effect on people with different political opinions if the Linen Hall suffered major cuts. The projects over the last number of years proved that The Linen Hall is the acceptable place for difficult conversations and discussions about our shared history and shared future.</p> <p>2.36 The Department should have due regard to the desirability of promoting good relations between people with different religious beliefs, different political opinions or from different racial groups. Linen Hall Library plays a key part in prompting good relations due to the mixed nature of the content available. The Linen Hall Library has accessible collections of both Ulster Scots &amp; Irish content which are available to everyone.</p>		

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	<p>2.37 Reduction in funding for Linen Hall Library will disproportionately affect Section 75 communities, this should be borne in mind in the equality assessment in such a way as to mitigate budget cuts at the library. The Linen Hall is a unique academic research centre, and a magnet for visitors which needs also to be borne in mind.</p> <p>2.38 'Politics in Action' group - Concerned Linen hall Library budget could be significantly reduced for 23-24. Two courses launched ('Politics in Action' &amp; 'Living History') would not have been feasible without the excellent support of the Linen hall Library. 'Living History' course was intergenerational and cut across class, social background, geography and educational achievements.</p> <p>2.39 Linen hall Library - Reduction in funding would impact on <b>People with different political opinions</b>. Small business has carried out substantial work for the Linen hall Library over past three years to maintain its important <b>Irish Language</b> collection. Reduction in funding likely to result in this work not being continued, affecting the availability of Irish language literature and impacting on the viability of our business, which is based on the peace line in Belfast (in the North City Business Centre) and provides employment to both communities.</p> <p>2.40 DfC provides match funding to the BCC Community Festivals Fund, a long-standing scheme established to support 15 community festivals in Belfast. Any reduction or removal of match funding for this scheme would have an adverse impact on the delivery of the fund and the community organisations it supports.</p>		

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		<p>2.41 EQIA references Third Party Organisations at 7.v but doesn't provide any specific detail on actual organisations or numbers of disabled people and those economically inactive who secured and sustained paid employment. The EQIA document is incomplete in respect of potential impacts on disabled people.</p> <p>2.42 In line with 2.2 of the Equality Impact Assessment, there is little data to support the requirement for the Department to have "due regard to the desirability of promoting good relations between people with different religious beliefs, different political opinions or from different racial groups.</p> <p>2.43 Another issue that isn't included is the absence of any criteria to determine impact on low-income households. This is a key issue, and with CCÉ providing low-cost music lessons and instrument hire, it is imperative that people from all backgrounds should be able to access music and the arts. As an organisation that has been delivering this for over 70 years, CCÉ want to be able to continue to do this in the years ahead.</p> <p>2.44 Additional to the issues identified in Section 7, CCÉ would add that the decrease in funding will lead to a loss of opportunities to host large scale events and make other regions a more attractive prospect for hosting. Whilst the initial investment may require funding from the department and/or its ALBs, the economic return generated far outweighs this.</p> <p>2.45 "CCÉ believes that the department should determine need on the basis not of making cuts across the board, but to review strategically how existing funded projects align with future ambitions to develop a more shared society.</p>	<p>The Department recognises the benefits of the Community Festival Fund, at this stage no reductions are proposed to the 2023-24 allocation.</p>

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	<p>There are several reports which identify the cost of division, as well as evidence to support the benefits of a more integrated society, and so through cutting funding to projects that support this outcome would be short-sighted and ultimately, result in additional costs in the long-term.</p> <p>Vulnerable and marginalised groups, some of which are included in Section 75, must be able to access culture and arts, and CCÉ's unique position is also playing a key role in making Irish culture more accessible across the community by demonstrating the shared cultural heritage on and across these islands.</p> <p>2.46 <b>DFC contribution to NI Screen</b>, supporting film exhibition organisations such as Belfast Film Festival, Cinemagic etc and delivering work in areas such as <b>after schools clubs that reach often vulnerable groups and individuals</b>. Cinemagic last year delivered work that worked with young programmers to screen films that directly delivered <b>support to foodbanks</b>. Across all the section 75 areas, access to culture has not been identified as a possible implication of reductions in funding. This will impact on the following groups:</p> <ul style="list-style-type: none"> <li>• People of different <b>ages</b> - cinema is one of the most efficient and low cost ways of young people accessing culture.</li> <li>• People with a <b>disability</b> - many of NI Screen's directly funded organisations offer services to disabled patrons which helps remove access to culture, for example subtitled screenings.</li> <li>• People with different <b>sexual orientations</b> - Cinemas are often a safe space and many of the above mentioned organisations work closely</li> </ul>		

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		<p>with LGBTQIA+ organisations to show work which gives a cultural space to that community.</p> <ul style="list-style-type: none"> <li>• People with or without <b>dependents</b> - many of the above mentioned organisations provide a low cost family cultural experience. If ticket prices were raised, many of these groups would suffer.</li> </ul> <p>These funded organisations also provide support and development to the wider NI community cinema sector who are delivering in rural areas far from Belfast or Derry. Any reduction in funding will see lesser support and therefore less rural audiences being served and allowed access to cultural cinema.</p> <p>2.47 <b>Data - People with a Disability:</b> Disability Sport NI - Impact of Covid 19 survey - The impact of Covid-19 on people with a physical disability’s mental health and participation in sport and active recreation.</p> <p><b>Adverse Impacts</b> - Research shows that <b>Disabled people, Women and Girls and those from areas of deprivation</b> have been disproportionately affected by Covid-19 and the cost-of-living crisis. <b>Physical activity levels were already lower for these groups</b> and their participation rates have been slower to return to pre pandemic levels than other groups. The cost-of-living crisis has also seen sports clubs affected with a significantly high proportion of clubs extremely concerned that the most affected groups will see an even bigger drop in participation levels.</p> <p>A reduction in capital investment would have a <b>significant impact in the development of sports facilities, particularly when making these more accessible</b> for people with a disability or more welcoming for children and</p>	

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		<p>young people or women and girls. Sports and community facilities often do not have the required accessible access to enable everyone to be able to take part in their facilities.</p> <p>Inability to fulfil the equality Strategy 2022-2025 that specifically highlights inequalities, including:</p> <ul style="list-style-type: none"> <li>• 12% of <b>LGBT community</b> “avoid participating in sports groups because of fear of discrimination or harassment”</li> <li>• Accessibility to (...) active recreation and venues and activities by <b>people with a disability and older people</b>”</li> <li>• Less participation in sport and physical activity by <b>females, older people (over 45), racial group, marital status, marital status, people with a disability and people with dependents</b>”</li> <li>• Under representation of <b>women</b> in community development and leadership roles (...)</li> </ul>	
3	<b>Employment Support, such as Labour Market Partnerships</b>	<p>3.1 The Department's funding allocations need to support people with disabilities and special educational needs with barriers to employment from being excluded from our society.</p> <p>3.2 Labour Market Partnerships support the most vulnerable and marginalised in finding work and retaining employment. The removal of this funding will impact people in our local communities.</p>	<p>The Department continues to support those with barriers to employment through a range of diverse labour market provision. In considering allocation of the Department's constrained 2023-24 Budget careful consideration has been given to balancing priorities, need and available</p>



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		<p>3.3 The LMP approach has helped companies find new employees from the most disadvantaged backgrounds in NI, who otherwise would never have found employment by themselves and would therefore still be a financial burden to the government. Rather than stop the LMP program, other funding options should be considered. This will reduce the dependence on the benefit system.</p> <p>3.4 Pausing Labour Market Partnerships investment would have a strategic impact on the implementation of a number of programmes aimed at helping long term unemployed and economically inactive people return to the workforce. This will place NI behind the rest of the UK when it comes to labour market strategy and the provision of training to enable the NI workforce to address current and future skills. This will impact people with disabilities, women who have stepped out of the workforce and find it difficult to return without the right skills provision.</p> <p>3.5 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>funding to maximise the supports the Department provides to those who need it most, including any adverse impacts on Section 75 Groups.</p> <p>The Department acknowledges the impact Labour Market Partnerships budget cuts will have on vulnerable people and Section 75 groups.</p> <p>The Department will continue to support those with barriers to employment through a diverse range of labour market provision. This includes a range of services delivered through our network of 35 local Jobs and Benefits Offices, and employability programmes such as Workable NI, Access to Work NI, Condition Management Programme, Advisor Discretionary Fund, and Work Experience Programme.</p> <p>Additionally, across 2023-24 and 2024-25, the NIO is providing a</p>

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	<p>Disability - Mid Ulster has the highest disability employment Gap and this was an area where it was felt that employers were unaware of the opportunities available to them - without this support it is unlikely that these individuals will achieve long term employment.</p> <p>3.6 LMPs are a critical intervention with an aim to improve the employability outcomes for people. They exist to help people secure and maintain employment the ripple effect of the budget cuts will result see employability outcomes come under pressure.</p> <p>3.7 DfC to reconsider reinstating funding the LMPs, removal of Labour Market Partnership programme funding should be reinstated as it has helped boost employment/self-employment/skills levels within the council area. Pausing LMP funding will undermine the opportunity to support people into employment.</p> <p>3.8 The Department of Communities should be mindful of its statutory obligations in relation to section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006), and in particular the disability duty to encourage participation by disabled people in public life.</p> <p>Those included in the Section 75 groups, will face additional barriers to employment and the removal of support which has been provided via the Labour Market Partnership will only serve to compound these barriers and see them further from the labour market in this cost-of-living crisis.</p>	<p>funding allocation to Northern Ireland of £15m for JobStart, and the UK Government is providing Shared Prosperity Funding of £57m.</p> <p>In considering allocation of the Department's constrained 2023-24 Budget careful consideration has been given to balancing priorities, need and available funding to maximise the supports the Department provides to those who need it most, including any adverse impacts on Section 75 Groups.</p> <p>The Department recognises and values the importance of the Labour Market Partnerships with Councils and the positive outcomes which can be delivered. Since the Department launched its Budget 2023-24 EQIA, considerable work has been ongoing to consider other funding options to sustain LMPs in 2023-24.</p>	

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		<p>The need to intervene with programmes to address the situation of female economic inactivity was being addressed by the LMP through the provision of employability academies designed to support women who wished to work but faced challenges of affordable childcare. This could be affected.</p> <p>3.9 The adverse impact of removing funding for LMP's on the local employment sector cannot be underestimated as they have the potential to do so much more and removing this funding will ensure that those from the Section 75 groupings most at risk, who need support will simply not get it and this will perpetuate economic immobility for local people who face barriers to employment. This in turn will have a wider impact on the local and wider economy at a time when employers are reporting a tight labour market and difficulties with recruiting and retaining skilled staff. The impact of a withdrawal of funding will be that economic inactivity will continue especially for Section 75 groups including women.</p> <p>3.10 The Department could continue with LMP delivery for 23/24 with reduced staff to deliver a reduced low cost action plan until additional funding can be allocated to support a full action plan. This would enable the Labour Market Partnership members to continue to build on the partnership work which has been established and continue to work together to support those in need of employability support.</p> <p>3.11 An action plan had been prepared and expectations raised across Newry Mourne &amp; Down District among LMP membership organisations and beyond for an Action Plan for 2023-24. This 'pause' will create confusion and</p>	<p>The 2023-24 Budget Settlement presents significant challenges for all NICS Departments to manage the forecasted level of pressures in 2023-24.</p> <p>The Department acknowledges the impact budget proposals will have on vulnerable people and Section 75 groups. Across 2023-24 and 2024-25, the NIO is providing a funding allocation of £15m for JobStart which is projected to support approximately 1500 young people.</p> <p>The LMPs were provided with assurance of funding until 30 June 2023. There has been considerable engagement with Councils with regards to options to continue funding LMPs beyond 30 June 2023.</p> <p>The Department continues to meet its statutory obligations and</p>

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	<p>ultimately damage the credibility of LMP for any potential reengagement of LMP activity.</p> <p>3.12 Mid Ulster has the highest percentage of residents whose national identity is neither British or Irish. Removing employment support will result in Mid Ulster's LMP not being able to consider progressing projects as identified during the latest Strategic Economic Assessment process, which will support both participants and employees transition into work by assisting in barrier removal. Should Mid Ulster not be able to support these workers, this could result in a further restriction of potential workforce and skills pipeline, impacting on the area's ability to recruit and retain staff and therefore its GDP contribution to Northern Ireland. Mid Ulster also has the highest Disability Employment Gap. Only 24% of disabled people are in employment against an NI average of 37.3%. If funding is stopped, even temporarily to LMPs, trust will be lost, both with DfC and the LMP/Council itself and a resumption at any point would be very difficult. Pausing funding on the LMP initiative is short-sighted and will leave the economically inactive with no direct support provision. A huge amount of work and effort has been invested in building a shared commitment across the partnership as well as successfully delivering relevant local projects which are having a direct impact on both unemployed and economically inactive residents. This has been supported by the DfC team and their vision of how local provision can deliver immediate impact; it is clear that this localised partnership approach has been working successfully and delivering results. Board members and wider partners have contributed their time and expertise voluntarily in order to determine the best interventions with the highest outputs for the local area and were really encouraged by what they could contribute at a local, and to a lesser degree at a regional level. There was also a determination to continue making a difference to the local</p>	<p>will ensure all decisions relation to Budget reductions are in line with the Northern Ireland (Interim Arrangements) Act, which received Royal Assent on 24 May 2023.</p> <p>The Department recognises the hard work and commitment of LMP staff and partners in establishing and achieving success through local LMP structures. The Department continues to support those with barriers to employment through a range of diverse labour market provision. In considering allocation of the Department's constrained 2023-24 Budget careful consideration has been given to balancing priorities, need and available funding to maximise the supports the Department provides to those who need it most, including any adverse impacts on Section 75 Groups. The Department acknowledges the impact Labour Market</p>	

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		<p>economy under a new three-year strategy which is now at risk. Confidence in the system, reputations and the overall process will be damaged, possibly to the point that a similar model will not be successful in the future. Mid Ulster LMP would suggest that DfC should consider allocating a larger percentage of the budget to LMPs (e.g., 50%) which would enable LMPs to continue, albeit on a reduced basis. The impact of the reduction of funding should also be considered in the context of the additional benefits which may be an add on effect from moving unemployed and/or economically inactive back into the labour market. Less people may require social housing, benefit support, fuel poverty support etc. Moreover, the benefits to the individual in terms of confidence, feeling better about themselves, skill building, personal development etc., is immeasurable and has a direct correlation in reduced need for healthcare support, especially for mental health issues, education achievements, and overall contribution to their local communities. Mid Ulster LMP would strongly urge the Department to urgently review and reconsider the funding allocation to the LMP model. The proposed removal of funding for LMPs completely undermines the department’s policy and will result in no direct interventions being available to the economically inactive to encourage them back into the workforce. Additionally, a localised model which assesses the economic environment within each council district to address the unique issues being felt at a local level will no longer be available. Given the “people crisis” Mid Ulster industry is facing, the need for support and localised employability initiatives are more important than ever to meet the immediate and medium-term skilled labour shortages. Supporting people into fair, sustainable jobs is central to delivering many of the ambitions for a modern, inclusive and competitive economy in Northern Ireland.</p>	<p>Partnerships budget cuts will have on vulnerable people and Section 75 groups.</p> <p>The Department acknowledges proposed paused in LMPs funding from July 2023 could have adverse impacts across all Section 75 groups.</p> <p>The Department's funding bids for 2023-24 were not met in full. Work is ongoing to maximise use of the Department's 2023-24 Budget in the provision of public services and supports.</p> <p>Work is ongoing with regards to estates rationalisation, whilst ensuring continuity of front office / customer service focused delivery.</p>

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	<p>3.13 The NI disability employment gap is greater when compared to the UK and needs to be urgently addressed through the provision of adequate employability support for Disabled people. Women are disproportionately more likely than men to have caring responsibilities. Targeted programmes and support are critical to enable these women to re-join the labour force. Over the past twelve months our LMP has worked with a substantial number of women who have had to give up work because of caring responsibilities (childcare and older family members). Our interventions have had an enormous impact on these women – they have been able to upskill, access employment support, participate in employment academies as well as self-employment programmes. These programmes are making a difference and unfortunately with the current budget they will disappear. Demographic trends indicate an ageing and more diverse society which will have a significant impact on the labour market. The provision of sufficient employment support is crucial to mitigate such impact to help older people enter and remain in the workforce for longer. Audit of Inequalities accepts that ethnic minorities have ‘less developed social and economic networks and poorer job security. Employment support including upskilling, therefore is much needed to help these minority groups enter the labour market. The decision to withdraw Labour Market Partnership funding is the wrong one. Over the last year we have successfully founded our local partnership, engaging with a wide range of stakeholders, and building positive working relationships. Our members have given up their time as they truly believe in the LMP vision, that localised conditions require a flexible, local approach. This local approach is the message we have been promoting within our communities – it’s one that has been very much welcomed and declared long overdue. To pause the LMP programme now undermines this message and will cause long term, reputational damage to the LMP brand or any future DfC employability</p>		<p>Given the high disability employment gap in Northern Ireland, the Department has continued work to explore funding options to sustain LMPs in 2023-24 and mitigate impacts to people with disabilities.</p> <p>The Department recognises the adverse impact unemployment can have on young people, men and woman, disabled people and people with dependants and people in other Section 75 groups. With high levels of unemployment both young and disabled people can be further from the labour market.</p> <p>The Department has developed a range of labour market interventions to help people find work. These include a JobStart programme for 16-24 year olds, an expansion of the Advisory Discretion Fund, including the</p>

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		<p>programmes. This is not a programme that can be turned off and on. As well as our partnership we have also recruited a team of three staff over the past year. These staff have built strong links as a team, with the partnership and other stakeholders, but most crucially with our communities. The relationships formed and the trust built has been critical to the successful implementation of our action plan throughout the last year. In the absence of funding the risk is that these staff will secure alternative employment and accordingly these relationships will be lost. Moreover, the skills and expertise of the team will be lost. Relationships have also been formed with all other LMP's as well as the regional DfC team who have invested considerable time and resources launching the initiative. In the current environment we understand that a reduction of funding is unavoidable. Therefore, our proposal is that LMP's progress with a reduced budget, for example 50%. This will allow the work of the LMP to continue and avoids enduring damage to the programme. The current 2023/24 Budget will have a devastating impact. The lack of sufficient employment support and relevant interventions will disproportionately impact those most vulnerable in our society. The situation is compounded by the recent removal of ESF funding. We appreciate the difficulty making these decisions however when a cost-benefit analysis is considered, the withdrawal of LMP funding is counterproductive. This will put considerable strain on other DfC resources, such as Jobs and Benefits Office staff.</p> <p>3.14 In the absence of LMP funding, council staff will secure alternative employment and the skills &amp; expertise is lost.</p> <p>3.15 The Audit of Inequalities is evidence of the serious damage the proposed 2023/24 budget will have on Section 75 groups. The document provides a</p>	<p>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 recognised the need for tailored programmes for those with barriers to employment.</p> <p>The Department's Workable Programme has not been proposed for reduction as part of the 2023/24 budget allocations.</p>

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	<p>clear overview of the issues affecting these groups however, it is important to highlight that some aspects could be developed. For example, the Audit recognises that the Disability employment gap is higher in NI than elsewhere in the UK, however it does not emphasise the significant divergence in figures. In 2020 the disability employment gap for NI was 42.2pps, compared to 27.9pps for the whole of the UK. This is a substantial difference and one that needs to be urgently addressed through the provision of adequate employability support for Disabled people. The impact of the 2023/24 Budget will compound levels of deprivation in in disadvantaged areas where many are furthest from the labour market. As well as the Labour Force Survey, other recent NISRA publications provide useful and up to date data in relation to Section 75 categories. Consideration should be given for example to the 2021 Census results. These figures reflect demographic trends in successive surveys – we are an ageing and more diverse society. The working age population (16-64 years) of Causeway Coast and Glens is projected to decrease by 29.4% or 13,002 persons from 2018 to 2043. An older workforce will have a significant impact on the labour market and therefore the provision of sufficient employment support is crucial to mitigate such impact. These programmes will help older people enter and remain in the workforce for longer.</p> <p>3.16 Cuts to the Employment Support budget will have an adverse impact on our delivery of interventions to address skills gaps and in developing inclusive employability programmes.</p> <p>3.17 Cuts will impact on those with disabilities, those of working-age, women seeking to re-enter the labour market and will impact differentially across religious/political beliefs.</p>		



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	<p>3.18 While DfC's EQIA assessment has stated that they believe the reduction in funding will have an impact on Section 75 groups we believe that this has been underestimated for some of them, specifically: Religious Beliefs, Racial Groups, Age and Women.</p> <p>3.19 Concern over the ending of the European Social Funding as a result of Brexit, without a replacement and the pausing of Labour Market Partnerships while the north continues to have the lowest wages, lowest economic growth, lowest productivity, and highest economic inactivity compared with other jurisdictions on these islands.</p> <p>3.20 Cuts to Programme budget will have an adverse impact on our delivery of interventions to address skills gaps and in developing inclusive employability programmes It will severely hamper our city's ambitions in:</p> <ul style="list-style-type: none"> <li>• Creating inclusive pathways to jobs and careers by 2030 for those further back in the labour market and cut access to better jobs for those who are underemployed;</li> <li>• Reducing the proportion of economically inactive people of working age (by 2030 to 23 per cent from 30.1% in 2020), in alignment with the Belfast Agenda;</li> <li>• Cutting the proportion of the Belfast working-age population with no qualifications to 12%, reducing the working-age economic inactivity rate (excluding students) within the city to 18% and increasing the working age population who have attained Level 3-5 qualifications to 56% as</li> </ul>		

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		<p>well as doubling the number of Belfast residents entering the labour market each year with mid-level skills (at NQF levels 3-5).</p> <ul style="list-style-type: none"> <li>Reducing the proportion of working age population with no qualifications from 14.2% in 2017 to 10% by 2030, in alignment with the Belfast Agenda . The Belfast Agenda 2015-2035 sets out key strategic ambitions for the city. Working and Learning is one of the key priorities of the agenda which acknowledges that our skills base is vital to competitiveness, productivity, inclusiveness, and growth.</li> <li>Supporting the inclusive growth ambitions of the Council by targeting interventions on key cohorts: young people not in education, employment or training (Proportion of school-leavers entering employment, education or training), residents not in employment, residents with low skills levels (this will be measured by the proportion of working age population who have attained Level 2 or above) and in work, low earning residents.</li> </ul> <p>3.21 Loss of ESF and the reduction of funding for LMPs comes at a time when the employability and skills sector in Belfast has been decimated with a significant number of targeted interventions and supports lost. Particular impacts for:</p> <ul style="list-style-type: none"> <li>Religious Belief/Political Opinion – particularly south and east Belfast will be more adversely affected due to the poor uptake of employability and skills support in these areas;</li> <li>Racial group – Belfast is a more racially diverse Council than many others. With the reduction of ESF funding and the implementation of</li> </ul>	

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		<p>UKSPF funding which has limited target groups (economically inactive) racial groups, including those who are migrants or refugees may be impacted more adversely as there is no LMP funding to help support them into employment.</p> <ul style="list-style-type: none"> <li>• Men and women generally – Women may be more adversely impacted especially women who want to engage in employment and skills development in non-traditional skills, sectors, jobs.</li> <li>• Age – While DfC mention the impact on young people there is no mention of the older people who may need to return to work, re-skill for new work, etc.</li> </ul> <p>3.22 Unless there is additional funding provided by NI Departments, or from the Treasury, to address these shortfalls, there is a risk that this will result in a reduction in, or loss of, key pre-employment and employment services for these groups which will particularly impact on those most disadvantaged and/or furthest from the labour market.</p> <p>3.23 We stress that the provision of employment support is particularly important for women and therefore any cuts in these areas will have greater negative impacts for women.</p> <p>3.24 Women will experience greater adverse impacts due to a lack of funding to provide employment support because they are more likely to experience barriers to employment and are more likely to be economically inactive.</p>	

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	<p>3.25 We know from the Audit of Inequalities that young people between 16-24 are more likely to be unemployed thus the reduction in services will impact on their ability to access employment. Additionally, we know that those economically inactive are more likely to be female again highlighting adverse impact as support services are cut</p> <p>3.26 Economic Activity and Economic Inactivity by religion have not been included. Neither is there reference to the rate of unemployment by religious grouping. This data would be required to ascertain what the potential adverse impacts of the further roll out of Universal Credit and the closing of the Jobs and Benefits offices one day a week. Indeed the impact of the cut in funding for the Labour Market Partnerships will have a disproportionate effect on those of a Catholic background as there are more in this category searching for employment.</p> <p>3.27 To cut this service will hamper the Councils and the community sectors ability to create inclusive pathways to jobs and careers by 2030 for those further back in the labour market and cut access to better jobs for those who are underemployed; reduce the proportion of economically inactive people of working age.</p> <p>3.28 Cuts to LMP funding are likely to have a particularly adverse impact on this grouping and reduce the city's ability in meeting Belfast Agenda refresh (draft) target to reduce the disability employment gap within the city from 37% to 31% by 2026. Where funding is to be removed, Belfast City Council queries what mitigating actions will be put in place. Cuts to LMPs severely hamper our city's ambitions in:</p>		

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	<ul style="list-style-type: none"> <li>• Creating inclusive pathways to jobs and careers for those further back in the labour market and cut access to better jobs for those who are underemployed.</li> <li>• Reducing the proportion of economically inactive people of working age.</li> <li>• Cutting the proportion of the Belfast working-age population with no qualifications, reducing the working-age economic inactivity rate (excluding students) and increasing the working age population who have attained NQF levels 3-5.</li> <li>• Supporting the inclusive growth ambitions of the Council by targeting interventions on key cohorts: young people not in education, employment or training, residents not in employment, residents with low skills levels (this will be measured by the proportion of working age population who have attained Level 2 or above) and in work, low earning residents.</li> </ul> <p>3.29 We would also strongly urge DfC to reconsider planned cuts, ensuring there are no plans to pause or reduce disability / disability employment strategies that are already in train. Mencap acknowledge there will be a shortfall in provision for some disabled people through the proposed reduction in Labour Market Partnerships. However we have not seen evidence of these providing significant levels of person-centred supports to those furthest removed from the workplace. We would therefore recommend a thorough evaluation of LMP's, to assess their impact and explore the most suitable options going forward.</p>		

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	<p>3.30 Cuts to Programme budget will have an adverse impact on our delivery of interventions to address skills gaps and in developing inclusive employability programmes. It will severely hamper our city's ambitions in:</p> <ul style="list-style-type: none"> <li>• Creating inclusive pathways to jobs and careers by 2030 for those further back in the labour market and cut access to better jobs for those who are underemployed;</li> <li>• Reducing the proportion of economically inactive people of working age (by 2030 to 23 per cent from 30.1% in 2020), in alignment with the Belfast Agenda;</li> <li>• Cutting the proportion of the Belfast working-age population with no qualifications to 12%, reducing the working-age economic inactivity rate (excluding students) within the city to 18% and increasing the working age population who have attained Level 3-5 qualifications to 56% as well as doubling the number of Belfast residents entering the labour market each year with mid-level skills (at NQF levels 3-5).</li> <li>• Reducing the proportion of working age population with no qualifications from 14.2% in 2017 to 10% by 2030, in alignment with the Belfast Agenda. The Belfast Agenda 2015-2035 sets out key strategic ambitions for the city. Working and Learning is one of the key priorities of the agenda which acknowledges that our skills base is vital to competitiveness, productivity, inclusiveness, and growth.</li> </ul>		

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		<ul style="list-style-type: none"> <li>Supporting the inclusive growth ambitions of the Council by targeting interventions on key cohorts: young people not in education, employment or training (Proportion of school-leavers entering employment, education or training), residents not in employment, residents with low skills levels (this will be measured by the proportion of working age population who have attained Level 2 or above) and in work, low earning residents.</li> </ul> <p>3.31 Loss of ESF and the reduction of funding for LMPs comes at a time when the employability and skills sector in Belfast has been decimated with a significant number of targeted interventions and supports lost. Particular impacts for:</p> <ul style="list-style-type: none"> <li>Religious Belief/Political Opinion – particularly south and east Belfast will be more adversely affected due to the poor uptake of employability and skills support in these areas;</li> <li>Racial group – Belfast is a more racially diverse Council than many others. With the reduction of ESF funding and the implementation of UKSPF funding which has limited target groups (economically inactive) racial groups, including those who are migrants or refugees may be impacted more adversely as there is no LMP funding to help support them into employment.</li> <li>Men and women generally – Women may be more adversely impacted especially women who want to engage in employment and skills development in non-traditional skills, sectors, jobs.</li> </ul>	

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		<ul style="list-style-type: none"> <li>Age – While DfC mention the impact on young people there is no mention of the older people who may need to return to work, re-skill for new work, etc.</li> </ul> <p>3.32 While the funding for Belfast LMP would in no way cover the loss of ESF funding it would have allowed the LMP to assess the reduced European funding impact on the city in terms of residents, groups, etc who are not eligible for support under UKSPF funding and begin to formulate plans or put in place some sort of provision to support these residents. While DfC’s EQIA assessment has stated that they believe the reduction in funding will have an impact on Section 75 groups we believe that this has been underestimated for some of them, specifically:</p> <ul style="list-style-type: none"> <li>Religious Belief/Political Opinion – we believe that areas of the city (particularly south and east) will be more adversely affected due to the poor uptake of employability and skills support in these areas. This by the political/religious make-up of these areas means that these those of a particular religious belief/political opinion will be more adversely affected than those from North/West Belfast.</li> <li>Racial group – Belfast is a more racially diverse Council than many others. With the reduction of ESF funding and the implementation of UKSPF funding which has limited target groups (economically inactive) racial groups, including those who are migrants or refugees may be impacted more adversely as there is no LMP funding to help support them into employment.</li> </ul>	



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		<ul style="list-style-type: none"> <li>Men and women generally – Women may be more adversely impacted especially women who want to engage in employment and skills development in non-traditional skills, sectors, jobs. ESF funding had numerous projects which was directly targeted at women helping them to return to employment or skill/re-skill for new jobs. Current UKSPF funding has 2 projects which specifically target women (1 of which is NI wide). These projects have a narrow focus on only women who are economically inactive but have no consideration for women who may be unemployed or under-skilled and need help to skills up or re-train. LMP funding would have allowed this type of activity. Also as women tend to take up roles in caring, etc and this might lead to a lack of opportunity for them.</li> <li>Age – While DfC mention the impact on young people there is no mention of the older people who may need to return to work, re-skill for new work, etc. The cost-of-living crisis and other economic/social issues are driving older people back into work. Without LMP funding there are limited opportunities for these people to re-skill, re-train for employment. LMP funding would allow projects, etc to be developed to specifically support this target group.</li> </ul> <p>3.33 Cuts to LMP funding are likely to have a particularly adverse impact on those with a disability and reduce the city’s ability in meeting Belfast Agenda2 refresh (draft) target to reduce the disability employment gap within the city from 37% to 31% by 2026.</p> <p>Data on various age bands identifying disadvantage at both a regional and local government level needs to be incorporated within the EQIA and factored</p>	

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

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	<p>The reduction of funding for LMPs comes at a time when the employability and skills sector has been decimated with a significant number of targeted interventions and supports lost.</p> <p>Ceasing LMP funding will disadvantage the most economically and socially deprived residents of Belfast</p> <p>The impact of the reduction of funding should not only be assessed in terms of Section 75 but also in terms of the groups of people who, by their social/economic background, will be affected the most by budget cuts to LMP.</p> <p>3.34 Differential adverse impacts on S75 disability, women &amp; ethnic minority groups have been identified as requiring tailored programmes to achieve equitable access to the labour market.</p> <p>3.35 No funding to replace ESF support and LMPs has a substantial adverse effect on DfC Policy areas regarding the needs and issues of disabled people to gain employment and employers to recruit disabled people.</p> <p>3.36 Workable NI Jobsearch Element Payment 23/24 has been withdrawn without consultation. This is in contradiction to the Department's current Workable NI Guidelines for 23/24.</p> <p>3.37 EQIA references USEL Ltd at 7.iv, as the largest provider of support for people with disabilities and health conditions to move into work, the removal of Jobsearch Element Payment from Workable NI prevents USEL Ltd from continuing this work - the EQIA is therefore incomplete and incorrect as a result of this decision.</p>		

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		<p>3.38 The EQIA has mentioned young people, but not older people. Ards and North Down has the highest percentage in Northern Ireland of people aged over 65 at 22.1%. The EQIA therefore does not take into account the fact that these individuals, some of whom have consideration experience and knowledge, can contribute on a voluntary basis to some mentoring programmes aimed at helping younger people to reconnect with work and training. Additionally, there could be opportunities for these people to reskill and retrain and return to the work force, particularly in light of the cost-of-living crisis.</p> <p>3.39 The EQIA does not address the section Men and Women and has failed to comment on the adverse effect that the proposal to withdraw funding to the LMP would have on women and single parents or people with caring responsibilities. The programmes run by the LMP, such as Academies, provide a “Barrier Removal” element which can be used by women and people with caring responsibilities to access training and employment, knowing that their dependants are being cared for professionally, freeing time for them to work or learn.</p> <p>3.40 The EQIA does not address Ethnic minority groups such as newcomers from outside of Northern Ireland. In the current geo-political situation, newcomers have arrived in Northern Ireland seeking to contribute to the local community and economy. The LMP, through its work, is a vehicle to engage with potential employers and organisation to facilitate integration in the local economy.</p>	

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	<p>3.41 With the proposal removal of the LMP, the most vulnerable groups in our council area are at risk of being further pushed into poverty and economic inactivity as the support currently and previously available will not be there to address their needs.</p> <p>3.42 At 24%, Mid-Ulster District Council has the lowest employment rate for disabled people in Northern Ireland. There is a large and significant difference between Mid Ulster and other Council areas – the highest ranked Council (Lisburn &amp; Castlereagh) has double (48%) the disability employment rate of Mid Ulster. Therefore the ‘pausing’ of this project has a direct negative impact on people with a disability who require support to enter the labour market. This seems like a particularly punishing removal of a service which has been long requested by organisations who support people with a disability and knowing the release the negative impact of long-term isolation from the labour market can have for people with a disability.</p> <p>3.43 In 2021 Mid-Ulster had the lowest employment rate for women in Northern Ireland. At 61% it is considerably below the Northern Ireland average of 68%. Therefore, it is hard to justify the ‘pausing’ of the project that directly aims to have a positive impact upon economically vulnerable groupings.</p> <p>3.44 In terms of Labour Marketing Partnerships Economic Activity and Economic Inactivity by religion have not been included. Neither is there reference to the rate of unemployment by religious grouping. This data would be required to ascertain what the potential adverse impacts of the further roll out of Universal Credit and the closing of the Jobs and Benefits offices one day a week.</p>		

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	<p>3.45 End of ESF funding and no support for Labour Market Partnerships would remove key interventions to assist people to upgrade skills and improve their lives take place.</p> <p>3.46 The <b>loss of funding for Labour Market Partnerships will impact on older people</b>. With an aging population this must be taken into consideration as there may be an increasing need for this demographic to return to work or re-skill for new work due to the implications of the cost-of-living crisis. Persons of different age, persons with disabilities, persons with dependants and especially those that fall within more than one of these groupings, are all likely to be disproportionately affected by any loss of funding as they will have less opportunities to have the Council aid their referral. All such persons are also more likely to rely on specific programmes to combat isolation, hunger and warmth and are therefore more likely to suffer as a result of cuts across a range of services.</p> <p>3.47 (Very detailed data on Mid and East Antrim Labour Market Partnership (LMP) provided.) The <b>absence of LMP funding will have a devastating detrimental impact on the individuals and families who live in these areas</b>, who experience multiple hardships, food and fuel poverty being most prevalent. <b>Young people are at risk of paramilitary influence</b>, which has a harmful effect on themselves, their family and the wider community. With an <b>aging population</b> Mid and East Antrim are also adversely affected by cuts in programmes that aim to mitigate the hardship of our older generation.</p> <p>The decision to pause funding for Mid &amp; East Antrim Labour Market Partnership activity is expected to have a disproportionately negative impact on:</p>		

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

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		<ul style="list-style-type: none"> <li>• support required to help those into employment being reduced.</li> <li>• the cost of living crisis continuing while the money available for discretionary support grants is decreasing, and</li> <li>• the supporting people services dwindling due to funding cuts</li> </ul> <p>4.2 We would point to two additional reports which have been published since the Audit was completed and should be considered:</p> <ul style="list-style-type: none"> <li>• Homeless Connects Staffing Challenges within the Homelessness Sector research published in September 2022. If this survey is representative of the wider homelessness sector in Northern Ireland, and we have no reason to doubt its Consultation Response it would indicate that any cuts which fall on the sector would have a particularly negative impact on two section 75 categories: women and people from a Catholic background.</li> <li>• Experiences of Youth Homelessness. This research, produced on behalf of NIHE, highlights the negative impacts of homelessness on young people. The research provides valuable data on the impact of youth homelessness, including additional insights around a number of section 75 categories which intersect with age.</li> </ul> <p>4.3 We are concerned that the reductions will have a devastating impact across the sector, destabilising efforts by statutory and third-party organisations and setting back progress made in COVID recovery and further entrenching the inequalities faced by many people experiencing poor housing and</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. The proposed budget was therefore protected and has not been reduced from the 2022-23 position, despite the Department's budget being reduced.</p> <p>The Department acknowledge Homelessness funding provides vital services and that the reduction will have adverse impacts on several of the groups protected by Section 75, as such consideration will given to this when determining final budget allocations.</p>



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		<p>homelessness in an ever-deepening cost of living crisis. Specifically, the budget reductions will undercut the policy direction set in the NI Homelessness Strategy 2022-27 which is explicitly about homelessness prevention and the DFC Housing Supply Strategy.</p> <p>4.4 Housing Rights is expressly concerned about the impact of the proposed budget reductions on the NIHE’s capacity to deliver the 2022-27 Homelessness Strategy, a strategy which is explicitly premised upon the need to prevent homelessness in the first instance. The NIHE Homelessness Strategy 2022-27 acknowledges throughout that the ability to successfully meet its objectives relies on an appropriate level of funding being made available. The pressure on NIHE’s budget to meet their statutory obligations is well evidenced and we are concerned that the budget allocation will place these obligations under further pressure. NIHE’s Homeless Strategy also acknowledges throughout its reliance on partnership working with a range of delivery partners in the wider housing and homelessness sector, with other organisations and projects reliant on funding from the NIHE as part of the Strategy delivery. This includes a number of projects which work to prevent homelessness which are delivered by Housing Rights.</p> <p>4.5 It will be virtually impossible to provide services to prevent homelessness, with the overwhelming proportion of the homelessness budget focused on response rather than prevention. The proposed draft budget comes at a time of unprecedented levels of homelessness; a 15% rise year-on-year in the number of households to whom the NIHE has the highest legal duty, i.e. ‘full duty applicants’. Perversely, failure to fund prevention services, will lead to greater numbers living in expensive temporary accommodation, leading to greater budgetary pressures over time. Indicative funding of £26.4m has been</p>	

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		<p>outlined, resulting in a funding shortfall for all homelessness services, of circa £7.4m.</p> <p>4.6 By solely funding temporary accommodation, and not funding wraparound services, thousands of people experiencing homelessness may be without any support or advice. In our professional opinion this will leave many people exposed to repeat homelessness, as their temporary accommodation placements fail. The impact of this for other public services will be acute.</p>	
5	Housing	<p>5.1 Housing Rights is also concerned by the proposed 5% cut to the 2022/23 baseline budget of the Northern Ireland Housing Executive (NIHE). Housing Rights notes that the proposal is to impose a budget reduction on last year's baseline budget, which will compound the difficulty for NI's only regional housing authority and the body with the lead role in NI's Homeless Strategy.</p> <p>5.2 Reduction in Funding to NIHE - will disproportionately impact those with dependents, with disabilities, in early working age (higher rates of homelessness), women at risk of domestic violence or abuse and LGBT persons who exhibit higher rates of homelessness.</p> <p>5.3 As we deliver and fund services to the most vulnerable in our society, a funding shortfall will undoubtedly have adverse impacts on several of the groups protected by Section 75. These programmes are:</p> <ul style="list-style-type: none"> <li>• Energy Efficiency Grants;</li> <li>• Social Housing Development;</li> <li>• Homelessness (impacting the following services):</li> <li>• Community Based Support and Prevention Support Initiatives;</li> <li>• Homelessness Prevention Fund;</li> </ul>	<p>The Department recognises that this proposal will have adverse impacts on several of the groups protected by Section 75. This budget funds the Housing Executive Regional Services functions and the majority of these are either contractual, statutory in nature or being delivered following a Ministerial decision. As such there is limited scope to actively manage a reduction in financial resource requirements, without directly reducing services. This will be taken into consideration in the Department's final Budget allocations for 2023-24.</p>

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		<ul style="list-style-type: none"> <li>• Housing First for Youth;</li> <li>• Complex Lives;</li> <li>• Supporting People; and</li> <li>• Travellers Sites Improvements, Maintenance and Running Costs</li> </ul> <p>5.4 The majority of the Housing Executive Regional Services functions are either contractual, statutory in nature or being delivered following a Ministerial decision. As such there is limited scope to actively manage a reduction in financial resource requirements, without directly reducing services.</p> <p>5.5 Social housing helps people in need to sustain a good quality and affordable home. Our social housing sector is already struggling to meet its target number of homes due to the increased need and demand. With c45,000 people on our waiting list in NI against the reduced target number of new builds per year, many people will wait longer before their needs are met. We are concerned about the potential equality impacts of this policy on specific groups – there is a risk of perpetuating or exacerbating existing inequalities. The number of social homes that can be built would decrease due to diminished funds and social housing waiting list numbers are likely to rise.</p> <p>5.6 Proposed cuts to funding social housing (on 31 March 2022 there were 44,426 applicants on the social housing waiting list. Of these applicants, 31,407 were in 'housing stress' and 10,135 households were accepted as statutorily homeless).</p> <p>5.7 A reduction in the Affordable Warmth Scheme budget (more information required in terms of the scale of the reduction and perhaps this represents an opportunity to review the effectiveness of the scheme).</p>	<p>With DfC facing a Capital funding gap of £59m in 2023-24, the Department acknowledges that managing a Capital pressure of this magnitude will undoubtedly have a significant and adverse impact on the Department's ability to meet demand for capital programmes which support public services in 2023-24.</p> <p>The Department will consider the points raised when prioritising its Final Capital budget allocations for 2023-24, while working with the NIHE to ensure allocation will be made in the most effective way possible too support those most in need."</p> <p>The Department recognises the impact reduced funding could have on Section 75 groups and is fully supportive of progressing NI</p>

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	<p>A reduction in funding towards Disabled Facilities Grants (this feels particularly punitive given the minimal savings compared to the detrimental impact on disabled people trying to live in their own homes).</p> <p>5.8 Reduction in Affordable Warmth funding will impact on the most vulnerable particularly during the COL crisis. Dept should consider any reduction given the linkage with Housing fitness, fuel poverty, health and educational attainment.</p> <p>5.9 There are over 25,000 households on the social housing waiting list with homelessness status, it should be a top level priority of the NI Executive to see more social housing built. It is obvious that without an adequate supply of affordable homes in the right places, it is impossible to prevent and reduce homelessness. The cut outlined in the EIA from 2,000 social housing starts to 1,400 starts will have the impact of extending the ongoing housing crisis, with the social housing waiting list continuing to grow and more and more households with homelessness status being forced to wait longer for access to housing. Adequate housing is a prerequisite of being able to uphold other rights and being able to participate in society. A lack of adequate housing can have deeply detrimental impacts on a person’s physical and mental health, economic prospects and wellbeing. It is incumbent on the Northern Ireland Executive collectively and DfC specifically to uphold the fundamental human right to adequate housing.</p> <p>5.10 Cuts to Housing will exasperate housing stress. Housing led regeneration policy contributes to reversing the physical, social, and economic decline of neighbourhoods, towns and city centres and the delivery of homes offers</p>		<p>Housing Executive Housing Transformation.</p> <p>The Department’s Capital budget allocation in 2023-24 will support investment in new social housing supply.</p>

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	<p>significant opportunities to help achieve balanced communities through well-linked, accessible, inclusive, mixed-tenure neighbourhoods.</p> <p>5.11 In ‘New Decade, New Approach,’ a commitment was made for a Programme for Government which included an outcome which provided “specific focus on ensuring every household has access to a good quality, affordable and sustainable home that is appropriate for its needs.” The proposed budget reductions will do irreparable damage towards this position.</p> <p>5.12 Housing Rights is particularly concerned that the stated impact of the reductions will mean a cut to the number of new Social Housing Units being built by 600 units. This will mean only 1400 units instead of the 2000 units originally targeted. The five-year projected need for new social homes in Northern Ireland for the period 2022-27 is 23,5573. This reduction in new builds will have a detrimental effect on meeting that target. The implications of not appropriately addressing housing supply are far reaching.</p> <p>This proposal will undercut efforts to address the social housing waiting list, which as of March 2023 stood at 45,105 households regrettably this number will not remain static. The cumulative effect of the cost-of-living crisis and proposed budget reductions elsewhere in public services (including the reduction in the Discretionary Support budget) will see an increase in the number of people finding difficulty affording to stay in their homes and may therefore result in an increase in homeless presentations.</p> <p>Housing Rights would urge the Department to consider how this impact may be mitigated. It is particularly important that the Department strengthen, not weaken efforts to prevent homelessness and sustain tenancies, by ensuring access to housing advice services, financial and other support to sustain</p>		

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		<p>tenancies. Failure to do so will have a human and financial cost to society with conservative estimates of the cost of each case of homelessness estimated to range from £4,972 to £36,119 per year. The EQIA should expressly identify the Section 75 groups most likely to be affected by this budget reduction and how the impact may be mitigated. While we acknowledge that any surplus Capital DEL (Departmental Expenditure Limits) which emerges will be allocated to social housing, the dire circumstances as laid out by the EQIA make this scenario unlikely. We therefore ask the Department to work proactively with housing providers to maximise new build social housing developments as a priority.</p> <p>5.13 Affordable Warmth - likely to disproportionately impact older persons, those with disabilities at greatest risk of fuel poverty.</p> <p>Private Sector Grants - cut will impact disproportionately on those with disabilities and potentially older people.</p> <p>Urban regeneration programme - will impact on accessibility with a disproportionate impact on those with disabilities, also younger people who may find employment through hospitality sector growth following investment.</p> <p>5.14 A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived wards in East Belfast such as Ballymacarrett and Woodstock.</p> <p>5.15 Proposal to close the affordable warmth scheme to new applicants is also likely to disproportionately impact both the deaf and visually impaired</p>	

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	<p>community as they will have been less aware of the scheme and/or been in a position to apply.</p> <p>5.16 Concern over the potential pausing of the Affordable Warmth Scheme, which is the Executive’s main intervention to support people on a low income who rent their home from a private landlord and who are most at risk of fuel poverty.</p> <p>5.17 We are concerned that this reduction will impact on the ability of the Department to meet its Vision as set out in the HSS, and the City’s ambition as set out in (the Community Plan for the City) which focuses on inclusive growth where no one is left behind. The Belfast Agenda is currently undergoing a statutory refresh, this includes a priority area of Housing Led Regeneration with the focus on increasing housing supply across all tenures, reducing social housing projections by increasing the provision of social homes through the Social Housing Development Programme and increasing the number of people living in the city centre across all tenures. Impact on those already in housing crisis and housing stress will be exasperated and also wider given that the investment in housing stock has the potential to address a number of economic and social problems. We believe that housing led regeneration policy contributes to reversing the physical, social, and economic decline of neighbourhoods, towns and city centres. The delivery of homes offers significant opportunities to help achieve balanced communities through well-linked, accessible, inclusive, mixed-tenure neighbourhoods.</p> <p>5.18 The provision of high quality, affordable social housing in areas of multiple deprivation is essential if the evidenced issues associated with poverty are to be addressed. This is particularly true in North Belfast where there is a chronic</p>		

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	<p>shortage of affordable, quality social housing. Any reduction in the provision of social housing in North Belfast will have a detrimental impact on all section 75 groups.</p> <p>5.19 A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived DEAs. The reduction in the budget available to the NIHE could impact progress in terms of the good work to date under the auspices of Community Planning and the Housing Led Regeneration Group Impact on those already in housing crisis and housing stress will be exasperated and wider given that the investment in housing stock has the potential to address several economic and social problems.</p> <p>Affordable Warmth - any reduction to this scheme will have a negative impact on those most vulnerable in society.</p> <p>Private Sector Grants and Major Adaptations - any reduction on service will have a detrimental impact on areas of deprivation which have been identified by NISRA. The impact of these multiple cuts will be worst felt by the people living in these areas and the most vulnerable.</p> <p>5.20 Housing and affordable/sustainable energy. The EQIA indicated that the funding for the Housing Supply Strategy would be reduced, leading to fewer new homes to reduce the growing waiting list for social housing. Similarly, the EQIA also indicated that the Affordable Warmth Scheme and Housing Adaptations budgets could be cut, all of which would have negative impacts on disadvantaged children and young people.</p>		



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	<p>5.21 Insufficient social housing stock can have serious implications in domestic violence situations leaving victims (68% of victims are female) trapped in coercive and abusive situations as they have nowhere to go. The ability of survivors of domestic abuse to rebuild their lives can be severely limited by a lack of suitable housing which is appropriate for their particular needs including the needs of disabled women.</p> <p>5.22 We again suggest that any cuts to help address fuel poverty including to the Affordable Warmth Scheme will have greater adverse impacts for women.</p> <p>5.23 The Department has informed Councils on 01 June that it has decided to remove targeting from the Affordable Warmth Scheme due to pressures placed on both capital and resource budget for 23/24. Continuation of the scheme is welcome however, the new delivery model may not now target and assist those most likely to be living in the most severe fuel poverty. It is important that the Department continues to develop policy and implements programmes to mitigate the effects of fuel poverty of low-income households across NI.</p> <p>5.24 The Council is concerned that this reduction in NIHE budget will impact on the ability of the Department to meet its Vision as set out in the HSS, and the City's ambition as set out in the Belfast Agenda (the Community Plan for the City) which focuses on inclusive growth where no one is left behind. Impact on those already in housing crisis and housing stress will be exacerbated given that the investment in housing stock has the potential to address several economic and social problems.</p>		

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	5.25	<p>A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived DEAs.</p> <p>Capital and Urban Regeneration – the public consultation on A Bolder Vision and the requirement to provide fully accessible and prioritised investment to Belfast city centre to enable inclusive growth and investment, and to reduce severance to communities and the wider city. The main impacts will be accessibility issues to the city centre, having a limited impact on investment for jobs and inclusive growth, and a continuation of the current severance issues to opportunities within the city centre.</p> <p>The reduction in the budget available to the NIHE could impact progress in terms of the good work to date under the auspices of Community Planning and the Housing Led Regeneration Group on the mapping and identification of public land for housing regeneration and the NIHE’s ability to be able to further progress sites and placemaking opportunities in terms of feasibility, concepts phases to delivery.</p> <p>Impact on those already in housing crisis and housing stress will be exasperated and wider given that the investment in housing stock has the potential to address several economic and social problems.</p> <p>Affordable Warmth - any reduction to this scheme will have a negative impact on those most vulnerable in society.</p> <p>Private Sector Grants and Major Adaptations - any reduction on service will have a detrimental impact on areas of deprivation which have been identified</p>	

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		<p>by NISRA. The impact of these multiple cuts will be worst felt by the people living in these areas and the most vulnerable.</p> <p>5.26 There are currently over 11,000 people on the social housing waiting list in Belfast, which represents over 27% of the Regional Social Housing demand. In March 2021 4.8% of Belfast households were recognised as Full Duty Applicant Homeless. A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived DEAs.</p> <p>5.27 A reduction to the NIHE budget will significantly impact on the Department’s previously agreed Vision on Housing Supply. Undoubtedly the reduction in the budget to the NIHE is going to impact some of the most vulnerable in our society – those experiencing homelessness and housing stress from some of the most deprived DEA’s in our city.</p> <p>We are concerned that this reduction will impact on the ability of the Department to meet its Vision as set out in the HSS, and the City’s ambition as set out in the Belfast Agenda (the Community Plan for the City) which focuses on inclusive growth where no one is left behind. The Belfast Agenda is currently undergoing a statutory refresh, this includes a priority area of Housing Led Regeneration with the focus on increasing housing supply across all tenures, reducing social housing projections by increasing the provision of social homes through the Social Housing Development Programme and increasing the number of people living in the city centre across all tenures.</p> <p>5.28 The reduction in the budget available to the NIHE could impact progress in terms of the good work to date under the auspices of Community Planning and</p>	

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	<p>the Housing Led Regeneration Group on the mapping and identification of public land for housing regeneration and the NIHE's ability to be able to further progress sites and placemaking opportunities in terms of feasibility, concepts phases to delivery. This was noted as a key priority in NIHE recent draft Corporate Plan to support Council through mapping exercises to identify housing potential. Any reduction of the NIHE budget will have a detrimental impact on areas of deprivation. Central and Local Government must work together to address the issue of housing stress. Multiple Cuts from all departments will impact on those most vulnerable in society including the communities that reside in Areas of Multiple Deprivation (as defined by NISRA). This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p> <p>5.29 Affordable Warmth Scheme has been a success in Belfast and provides the whole house approach providing fully funded support to the most vulnerable within Belfast. Funding has always been an issue and has never been enough to carry out the measures of the demands within Belfast. The Affordable Warmth Scheme prioritises those most vulnerable who are living in substandard conditions. Many of these people live in Areas of Multiple Deprivation. Any reduction to this scheme will have a negative impact on those most vulnerable in society.</p> <p>5.30 There are currently over 11,000 people on the social housing waiting list in Belfast, which represents over 27% of the Regional Social Housing demand. In March 2021 4.8% of Belfast households were recognised as Full Duty Applicant Homeless. A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived DEAs.</p>		

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		<p>5.31 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>Any cuts to help address fuel poverty including to the Affordable Warmth Scheme will have greater adverse impacts for women.</p> <p>5.32 NIHE &amp; Social Housing – In 2022 4,593 applications for Housing in Derry/Londonderry were pending, with 3,380 determined to be in housing stress. A reduction in the NIHE budget and Social Housing Development Programme will deeply impact upon the most vulnerable in our city and from some of the most deprived DEAs. The provision of high quality, affordable social housing in areas of multiple deprivation is essential if the evidenced issues associated with poverty are to be addressed. This is particularly true in Derry/Londonderry where there is a chronic shortage of affordable, quality social housing. Any reduction in the provision of social housing in Derry/Londonderry will have a detrimental impact on all section 75 groups.</p> <p>5.33 For victims of domestic abuse, lack of access to suitable accommodation is already a barrier to seeking help, and further cuts may therefore contribute to perpetuating cycles of domestic abuse, with long term impacts on victims as well as their families.</p> <p>5.34 Reductions to the NIHE budget will lead to longer delays in housing adaptations, reductions in supporting people and increased risk of homelessness all of which disproportionately impact upon disabled people.</p>	

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

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	<p>due to supply issues, and investment in prevention measures as a proportion of overall programme expenditure. It is critical to understand the scale and nature of need among particular groups, e.g. young people leaving care, women fleeing domestic abuse, etc.</p> <p>5.39 The nature of the Affordable Warmth scheme, targeting low income households who experience the effects of fuel poverty and energy inefficiency, means the impact upon vulnerable Section 75 groups will be profound. The targeted nature of the scheme is aimed at those areas where levels of fuel poverty are highest.</p> <p>5.40 The provision of high quality, affordable social housing in areas of multiple deprivation is essential if the evidenced issues associated with poverty are to be addressed.</p> <p>This is particularly true in Derry where there is a chronic shortage of affordable, quality social housing.</p> <p>Any reduction in the provision of social housing in Derry will have a detrimental impact on all section 75 groups.</p> <p>5.41 The proposed <b>reduction in new build social housing</b> from 2,000-1,400 units is of huge concern. The target set by the Housing Executive for new build social homes in rural areas has been missed in seven of the past eight years. Any further cut to the new build target will put further pressure on housing costs for Section 75 groups in rural communities and exacerbate poverty and inequality.</p>		

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	<p>The proposal to consider <b>closing the Affordable Warmth scheme</b> is starkly opposed of the Government's commitment to developing a fuel poverty strategy. This will impact on older people and disabled people in rural communities. Research has shown that rural areas face specific challenges which can exacerbate their vulnerability to fuel poverty. Without specific consideration of the breakdown of those likely to be impacted, we feel that the proposed cuts to affordable warmth will be discriminatory towards S75 residents.</p> <p>5.42 Potentially inequalities:</p> <ul style="list-style-type: none"> <li>• <b>Race and Ethnic Minority</b> - The Audit of Inequalities identified that lower proportions of Black residents own homes, and there is a higher prevalence of private renting amongst the minority ethnic and migrant communities. Poor housing management, high housing costs, and limited access to social housing leads to discrimination, hostility, and a host of health issues for the minority ethnic and migrant communities. The EQIA must consider how the cuts to Social Housing and the Affordable Warmth Scheme will adversely affect minority ethnic communities in Northern Ireland.</li> <li>• <b>Emergency Housing</b> - We would like further information on the impact of budget cuts to the NI Housing Executive's ability to provide emergency housing for people escaping abusive situations.</li> </ul>		<p>With DfC facing a Capital funding gap of £59m in 2023-24, the Department acknowledges that managing a Capital pressure of this magnitude will undoubtedly have a significant and adverse impact on the Department's ability to meet demand for capital programmes including the Social Housing Development Programme. Nonetheless it will put in place for the Programme a</p>



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			<p>target as close as will be possible to 2,000 social new build starts.</p> <p>The Department's Capital budget allocation in 2023-24 will support investment in new social housing supply to the maximum extent possible. The majority of available capital will be used to build more social housing. The Department will consider ways to retain momentum in the Development Programme.</p>
6	<b>Languages</b>	<p>6.1 We are also concerned that halting the Disability Strategy could undermine the progress that has been made towards drafting legislation recognising British Sign Language and Irish Sign Language, which we believe could be an important mechanism in improving the life chances of the Deaf community in Northern Ireland. This legislation was referenced in the New Decade New Approach agreement in January 2020 with a commitment from the Department to introduce a Sign Language Bill.</p> <p>6.2 The British Sign Language (BSL) and Irish Sign Language (ISL) communities have always been classed under disability however these groups are a linguistic minority. There are BSL and ISL users who fit across all Section 75</p>	<p>The Department has not proposed a reduction in funding for languages in the indicative 2023-24 Budget allocations.</p>

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	<p>equality categories as well as disability. BSL and ISL users require access to information and this includes where budget cuts affect them. BSL and ISL users are a minority within a minority and are often overlooked or often as an afterthought after decisions are taken. Protect the Sign Language Partnership Group funding of 200k and Protect the Sign Language Policy team within DfC.</p> <p>6.3 It would be important to take into account the issue of the continued development of the Irish language on a strategic basis when discussing budget decisions. Due to the fragile state of the Irish language in the north, and the lack of services available in the community through Irish, a reduction in support for groups providing Irish language services may have a greater impact on the Irish language sector than in other sectors. As the Department of Communities is responsible for the development of the Irish language at community and societal level, we would strongly encourage DfC to work closely with the DE and the DoH to ensure that the characteristics of the Irish language sector at community level are taken into account when making decisions. An integrated approach between such government departments will ensure that the harm caused by cuts is minimised at community level.</p> <p>6.4 The additional language barriers faced by deaf people in particular not only make services more inaccessible, but have also created barriers of perception and confidence, due to lack of understanding and awareness. As a result, individuals with sensory impairment, particularly those who are sign language users are often reluctant to engage with both statutory agencies and arms' length bodies or uncertain how to access these services in a way which enables them to feel in control and empowered. The impact of voluntary and charitable organisations in helping to address these barriers and to bridge the gap is immense.</p>		

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

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

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	<p>Council cannot 'renegotiate' the rates raised from the residents and businesses of the district to compensate for the reduction in the RSG, due to the timing of striking the rates, and the budget position announced by the DfC.</p> <p>7.3 The Department needs to establish a formula for calculating RSG, thus providing Council greater certainty on its future budget and allowing councils to have greater revenue raising powers.</p> <p>7.4 Likely to impact council areas with lower rates bases (who currently benefit). This will have a clear urban-rural differential impact – and should require a rural proofing.</p> <p>7.5 Concern over cuts to the Rates Support Grant, which was established to support more financially constrained councils, protecting rate payers from unfair rates hikes.</p> <p>7.6 Rates Support Grant was devised to assist the least wealthy and most deprived and rural Councils provide equality of service provision with the more wealthy Councils. 7 Councils impacted by the cuts and 4 Councils not impacted. Derry City and Strabane District Council is the most significantly impacted. Rates Support Grant funding is a critical component of the baseline funding of each of the 7 impacted Councils. Accordingly, any cuts will result in significant service reductions, excessive rates increases and likely redundancies in these Council areas. All Councils have already had to scale back services in response to inflationary and global cost of living pressures so any further cuts will have very severe impact. These cuts will fall across a range of services but given the correlation between low income/deprivation and S75 groups and inequality it will fall hardest on the poorest within these</p>		

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	<p>areas. Firstly, the cuts will clearly have a disproportionate on the Catholic population. Impact analysis from the Census 2021 illustrates that the Catholic population within the 7 impacted Councils is 51%. This compares to Catholic populations of 27% in those Councils who are not entitled to Rates Support Grant and 42% across Northern Ireland as a whole. Furthermore, of the 805,151 Catholics across Northern Ireland, 559,563 (69.5%) live in Council areas impacted by Rates Support Grant cuts.</p> <p>7.7 Rates Support Grant reductions will see ratepayers in less wealthy and more deprived and rural Council areas continue to pay higher and higher rates poundage's as a proportion of their property values compared to those in more wealthy Council areas. This is not a fair outcome of the NI rating system.</p> <p>7.8 Rates Support Grant funding is a critical component of the baseline funding of each of the 7 impacted Councils. Accordingly, any cuts will result in significant service reductions, excessive rates increases and likely redundancies in these Council areas. All Councils have already had to scale back services in response to inflationary and global cost of living pressures so any further cuts will have very severe impact. As one of the main councils to receive RSG, Newry, Mourne and Down District Council is severely impacted.</p> <p>7.9 DFC financial contributions to district councils, although supplemented by income from district Rates, are critical. The various amounts make a massive difference to the public and it is undoubtedly the case that material reductions in these amounts will produce significant negative impacts on the groups protected by Section 75. The DFC must have due cognisance for the consequences of the proposed funding reductions 2 and it would be</p>		

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		<p>unacceptable for the DFC to simply let the problem ‘flow downstream’; to do so would be unacceptable and morally unconscionable.</p> <p>7.10 With regards the overall budget and in particular from a Council perspective specifically Rates Support Grant(RSG) data on the Religious make-up of the Councils who receive RSG has not been included, this data will show that the Councils in receipt of RSG represent proportionately more people from a Catholic background than those not in receipt of RSG. Additionally, data on the age of the population should have been included, Causeway Coast and Glens Borough Council has a significantly higher proportion of its population in each of the over 50, over 60 and over 70 categories than those of the 4 Councils who do not receive RSG.</p>	
8	<b>Social Security Benefit Delivery</b>	<p>8.1 The Department needs to ensure that the appropriate IT infrastructure is in place to support benefit payments to the most vulnerable in our society. Consideration should be given to office estate requirements to ensure this support both customers and staff requirements.</p> <p>8.2 Failure to secure the funding necessary to appropriately resource benefit delivery (which will lead to delays in benefit payments and place working age claimants in financial hardship) is a cause for concern. It creates a risk of services to those most vulnerable people reliant upon social security in Northern Ireland. It is unacceptable that these people should experience greater delays in the administration of their benefits (especially during a cost-of-living crisis). Social security claimants need to be able to rely on the safe, timely delivery of existing social security services. While the Department aims to progress 'Move to UC' within its existing staff complement, it will put at risk delivery of the programme (and by extension people affected by the</p>	<p>The Department bid for the funding required in 2023-24 to recruit the additional staff required to deliver an increasing Universal Credit caseload; implement the Move to Universal Credit for tax credits and legacy customers; address increasing level of fraud in the welfare system and the IT infrastructure required to support benefit and pensions delivery.</p> <p>Given the constrained financial position at NICS level, the Department bids were not met. To</p>

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	<p>programme). Social security claimants affected by ‘Move to UC’ need to be reassured that additional resources are in place help with the challenges and safeguard the well-being of vulnerable people.</p> <p>Closure of Departmental Offices 1 day a week could lead towards a risk of further frontline JBO closures and by extension longer travel distances for claimants needing to use JBO’s. The Department should commit to ruling out any JBO closures.</p> <p>8.3 The proposed cuts to Social Security Delivery will have detrimental impact on people with disabilities, who are already experiencing high cost of living. Any delays or break in social security benefits will put disabled people at risk and cause stress and anxiety. The Department has a statutory responsibility to deliver benefits, and this should be a priority and not an area at risk.</p> <p>8.4 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Any reduction in support to vulnerable families will have a detrimental effect.</p> <p>8.5 This cut will impact those groups disproportionately dependent on UC, social security benefit and sickness &amp; disability payments. Likely that impact will be greatest in rural areas where pressures will be greatest.</p> <p>8.6 Cuts in the recruitment for the staff needed to process benefits will impact more greatly on those with dependants who were often already facing delays in having claims processed. With 49% of 0-19 yrs. in poverty in Inner East payment delays will affect those with dependents disproportionately.</p>	<p>mitigate the risk to benefits and pension service delivery (including the Move to Universal Credit), the Department will aim to sustain services and implement the Move to Universal Credit within its existing staff complement. This position is not without significant risk and will greatly exacerbate the pressure already being felt in operational benefit delivery areas, with potential impact on service delivery.</p> <p>The Department will closely monitor benefit and pension service delivery performance and clearance times during the year. Where possible, action will be taken to mitigate any impacts on benefits and pension service delivery.</p> <p>The Department acknowledges that its reduced 2023-24 Budget could have impacts across all Section 75 groups.</p>	



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	<p>8.7 Welfare reforms will disproportionately impact individuals with a sensory loss due to challenges around employability and increased costs of living with a disability. It is therefore essential that frontline staff, assessing and supporting with welfare changes are accessible and have the knowledge and skills to appropriately understand and meet the needs of individuals with a sensory loss, which can often be more time intensive.</p> <p>8.8 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Advice services and those working with vulnerable families all say that as we recover from covid, people on benefit support are struggling even more. Any reduction in support to that section of the community will have a detrimental effect on already struggling families.</p> <p>8.9 Any reduction in support to people on benefits will impact on those in most need. In the aftermath of the pandemic and in the middle of the cost of living crisis there should be no reduction in service. In fact, there should be increased support provided. Delays in appeals: With reduced funding, the tribunal service may face staffing shortages and increased caseloads, leading to longer waiting times for appeal hearings. Negative impact on well-being and quality of life: Personal Independence Payments are designed to help individuals with disabilities or long-term health conditions maintain their independence and improve their quality of life. When funding cuts lead to delays or denial of these payments, individuals may struggle to access necessary support, leading to increased financial hardship and a decline in overall well-being.</p>		

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	<p>8.10 Whilst not directly impacting on our primary delivery we recognise that any reduction in front line social security offices will have an impact on the primary beneficiaries of these services, who by the nature of the service provided are already disadvantaged through poverty.</p> <p>8.11 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Advice services and those working with vulnerable families all say that as we recover from covid, people on benefit support are struggling even more. Any reduction in support to that section of the community will have a detrimental effect on already struggling families.</p> <p>Belfast Tribunal Service - funding for this service needs to be mainstreamed and ring fenced. Funding cuts to such a service can have several negative impacts:</p> <p>Delays in appeals: With reduced funding, the tribunal service may face staffing shortages and increased caseloads, leading to longer waiting times for appeal hearings. This delay can cause significant distress and financial hardship for individuals who rely on PIP to meet their daily needs.</p> <p>Increased stress and anxiety: People awaiting appeal often experience high levels of stress and anxiety due to the uncertainty surrounding their financial situation. Funding cuts may exacerbate this stress, as individuals have to wait longer for a resolution to their appeal, prolonging the period of financial insecurity and emotional strain.</p>		

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	<p>Limited access to legal representation: Funding cuts may result in reduced availability of legal aid or support services for those navigating the appeal process. This can disproportionately impact vulnerable individuals who may struggle to understand complex legal procedures or represent themselves effectively. Without proper legal support, their chances of a successful appeal may be diminished.</p> <p>Negative impact on well-being and quality of life: Personal Independence Payments - funding cuts lead to delays or denial of these payments, individuals may struggle to access necessary support, leading to increased financial hardship and a decline in overall well-being.</p> <p>Increased strain on other services: If the Belfast Tribunal Service faces funding cuts, the burden of handling appeals may shift to other government agencies or services. This can result in increased pressure on alternative dispute resolution mechanisms, leading to delays and backlogs in those systems as well.</p> <p>8.12 Significant concerns raised on the impact of funding challenges on the administration of Universal Credit. There is a need to protect people most at risk of disadvantage across the Section 75 groups from the adverse impact of welfare reform.</p> <p>8.13 Universal Credit - it is simply unconscionable to accept that the initial wait would be lengthened in any way as a result of staff shortages within the Department to process and pay Universal Credit. This will have significant impacts for Universal Credit claimants.</p>		

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		<p>8.14 The consultation document suggests closing departmental offices one day per week but notes concerns about the impact on frontline customer service delivery especially for those who are the most vulnerable who require face to face support. The document rightly notes that this may impact on people with a disability and older people. We suggest that this will adversely affect people who are suffering from mental health problems who are more likely to need intensive and face to face support.</p> <p>8.15 Some of the likely consequences of the Department’s budget allocation highlighted in the consultation document could have severe impacts on new UC claimants as well as the process of managed migration.</p> <p>8.16 From UC research which was drawn from the early cohort of UC claimants in Northern Ireland, in many cases, their wait for a first payment was much longer than the intended five weeks. If the Department is unable to fill the stated vacancies in the ‘Move to UC’ team, then the expectation must be that longer waits will become more common again for new claimants.</p> <p>The risk of understaffing also increases the potential for operational delivery problems in the managed migration process. The direct risk to claimants if staffing levels are unable to support their managed migration, is that they would fail to migrate successfully within the deadline and lose out on any transitional protection as a result. Recruitment to the UC and Move to UC teams would also be very desirable to reduce the risk of increased hardship arising for new or migrated UC claimants which the DS fund would ultimately have to deal with.</p>	

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		<p>8.17 An impact on the primary beneficiaries of these services, who by the nature of the service provided are already disadvantaged through poverty. This in turn will add additional pressure on Advice Services which are currently under extreme strain.</p> <p>8.18 Health assessments are vital to ensuring that those most vulnerable within society, particularly those with disabilities, health conditions and older people are effectively supported. It is important that any budgetary cuts do not adversely impact on this service including diminishing service levels, increasing backlogs, waiting times and the possibility of benefits not being received by some of the most vulnerable in our society.</p> <p>8.19 While, at present, relatively few people who Mencap support are on Universal Credit, there is a clear direction of travel that more people will migrate to this benefit - and the associated mandation of visits to JBO's – in the coming years. It is, therefore, deeply concerning that DfC are proposing to reduce supports to individuals at a time when there is a need for increased local supports and information to people with a learning disability migrating to UC.</p> <p>8.20 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Advice services and those working with vulnerable families all say that as we recover from covid, people on benefit support are struggling even more. Any reduction in support to that section of the community will have a detrimental effect on already struggling families.</p>	

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	<p>8.21 At no point does the EQIA identify that children are more likely to be impacted by potential cuts to social security provision as they are more likely to live in poverty.</p> <p>8.22 Whilst not directly impacting on our primary delivery we recognise that any reduction in front line social security offices will have an impact on the primary beneficiaries of these services, who by the nature of the service provided are already disadvantaged through poverty. This in turn will add additional pressure on Advice Services which are currently under extreme strain.</p> <p>8.23 Recruitment for staff for frontline administration of benefits should be prioritised internally within the Department to meet support need.</p> <p>8.24 Cuts to social security delivery will disproportionately impact upon disabled people.</p> <p>8.25 People in general struggle to survive on social security payments and as more people move to universal credit this will increase. Advice services and those working with vulnerable families all say that as we recover from covid, people on benefit support are struggling even more. Any reduction in support to that section of the community will have a detrimental effect on already struggling families.</p> <p>8.26 Any reduction in support to people on benefits will impact on those in most need. In the aftermath of the pandemic and in the middle of the cost of living crisis there should be no reduction in service. In fact, there should be increased support provided.</p>		

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	8.27	Close Departmental Offices 1 day a week – This proposal states that it will realise savings in cleaning, security and energy. This will impact on the wages of cleaning and security staff. The average wage for a cleaner in Northern Ireland is 11:00 (Indeed) 58 p more than the minimum wage. This could have a very negative impact on the health and well-being and standard of living on the people affected by this proposal.	
	8.28	Whilst not directly impacting on our primary delivery we recognise that any reduction in front line social security offices will have an impact on the primary beneficiaries of these services, who by the nature of the service provided are already disadvantaged through poverty. This in turn will add additional pressure on Advice Services which are currently under extreme strain.	
	8.29	Women in rural communities take three times longer to escape from Domestic Abuse than women in urban communities. This needs to be taken into consideration if DfC seeks to reduce funding to community and voluntary organisations supporting victims of domestic violence.	
		If the Department seeks to close JBOs one day a week as a cost saving measure, we <b>suggest that it ensures Mondays and Fridays are protected from such closures.</b> Claimants in distress and seeking payments who need to see JBO staff face to face in a crisis should not need to wait an additional day over a long weekend if Fridays or Mondays are used as closure days. Then closure of JBO one day per week is likely to be exacerbated by the reduction in funding for public transport and community transport proposed by the Department for Infrastructure.	

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		8.30 Social Security Cuts - Will have negative impact on people with disabilities, who are already experiencing high cost of living. Any delays or break in social security benefits will put disabled people at risk and cause stress and anxiety. The Department has a statutory responsibility to deliver benefits and this should be a priority and not an area at risk. Cuts to front-line service delivery and the migration of legacy benefits to UC requires 300 additional staff which will not be recruited. This will put additional pressure on staff to fulfil the Departments statutory duty to process claims and make payments. The migration from legacy benefits to UC is already causing anxiety for claimants with the 5 week waiting period – any delays will cause more stress for claimants.	
9	<b>Social Strategies</b>	<p>9.1 The Department should continue to progress the social inclusion strategies, to support people in Section 75 groups.</p> <p>9.2 The Department’s proposal to indefinitely pause the work on both the Disability Strategy and the Disability Employment strategy risks a loss of momentum on what are already long overdue key strategy areas. Each of these strategies have, to date, had considerable resource assigned and progressed with a co-design approach with disabled people; halting these is likely to communicate a message of de-prioritisation of the input of disabled communities. The strategies are also key in underpinning future disability policy work, and we would urge the Department to reconsider proposals to pause these completely. As outlined in the Disability Strategy’s expert panel draft report and recommendations; “The Disability Strategy, and all laws and policies which underpin it and flow from it, can act as a gold standard to demonstrate how meaningful participation of d/Deaf and disabled people can be achieved in design, implementation and monitoring.” Proceeding with the</p>	Work has been undertaken on draft Social Inclusion Strategies for consideration by an incoming Minister and Executive. The absence of both Ministers and an Executive since the end of 2022 has meant that work to update the Strategies has been unavoidably constrained and, even if this work could be progressed, final content of each, including the resources required for delivery, will require Executive approval. The 2023-24 EQIA on the DfC budget set out the particularly challenging context for the year ahead and the



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		<p>proposed cuts outlined will effectively mean that the Department loses the opportunities to maximise the cross-departmental approach toward disability and maximise the benefits of existing programmes.</p> <p>9.3 Policy needs to be distributed to address the imbalance between women and men as women are more likely to be lower paid, providing care to others, in receipt of social security benefits and victims of domestic violence.</p> <p>9.4 The DfC social inclusion strategies provide an example of a cross departmental process that would have assisted this process, but our understanding is that they have been halted as part of the budget crisis.</p> <p>9.5 Although they were not mentioned in the EQIA, these strategies are vital in addressing disadvantage and promoting social inclusion, particularly for children and their families. However, without a budget to develop and/or deliver new actions, their impact will be severely limited and have an adverse effect on children, young people and families.</p> <p>9.6 No funding to Executive and New Decade New Approach commitments, including Social Inclusion strategies and associated legislation – the suite of Social Inclusion Strategies is an attempt to address poverty and inequality in a range of areas and it is extremely concerning that no funding has been allocated to these despite being committed to in the New Decade New Approach Agreement. It was clear from each of the Expert Panel Reports on the Social Inclusion Strategies the urgent need to address existing inequalities and therefore a lack of funding to progress these will have adverse impacts across all the Section 75 groups.</p>	<p>Department is in the process of working through the implications, including what work will need to be prioritised in the short and medium terms (reflecting, of course, the need to continue to resource this Department's broader social inclusion policy responsibilities).</p>

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		<p>9.7 We would advocate immediate action to take a cross-departmental comprehensive approach which examines the cumulative and overarching effects of cuts from all the departments. The DfC social inclusion strategies provide an example of a cross departmental process that would have assisted this process, but our understanding is that they have been halted as part of the budget crisis.</p> <p>9.8 We need new government strategies for poverty and disability and old age yet they are all stopped as there is no money - this will mean no work will be done to improve services in these areas.</p> <p>9.9 Potentially inequalities:</p> <ul style="list-style-type: none"> <li>• <b>Gender identity and sexual orientation</b> - A report from the Brunel Centre for Sport, Health, and Wellbeing highlighted that there are barriers to participating in sports for LGBTQIA+ people. The cuts to the Arts and Culture sector proposed in the 2023-24 Budget will have an adverse impact on the LGBTQIA+ community.</li> </ul>	
10	<b>Staff Vacancies</b>	<p>10.1 Given the level of vacancies facing the Department, measures need to be in place to ensure available staff resources are used in the most effective way.</p> <p>The Department and wider NICS also needs to ensure a meaning pay award is provided to staff, to ensure public sector pay maintains pace with private sector pay and does not impact of the Department's ability to recruit staff.</p>	<p>The Department has robust complement methodologies in place to determine the staff numbers required to maintain service delivery. Whilst the Department's 2023-24 Budget is constrained, the Department will prioritise its available resources to best support service delivery.</p>

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			The Department recognises the significant contribution staff have made throughout the Covid-19 pandemic and continue to make during the current Cost of Living crisis. Whilst the Department is supportive of a meaningful pay award for staff, this will be subject to overall affordability at an NICS level.
11	<b>Supporting People</b>	<p>11.1 In 2020 a report completed by the Supporting People programme as the policy and funding framework for housing support services, identified significant shortfall in supply of support for a range of groups. Those shortfalls will only now be further exacerbated by the budget cuts.</p> <p>11.2 Cause for concern that no funding allocated towards a Supporting People provider uplift. A reduction in funding to the Supporting People Programme (again further information is required to assess the impact in terms of the scale of the reduction and the services that may be affected).</p> <p>11.3 Funding cuts to the Supporting People programme will have a detrimental impact on many S75 groups. It should also be noted that a number of Council staff are directly employed to assist in administering the scheme on behalf of DfC/NIHE. Should the funding cease or be further reduced then these posts will certainly be at risk.</p>	<p>The Department values the outcomes delivered through the NI Housing Executive's Supporting People Programme and providers, and recognises the vital contribution of the providers during the Covid-19 pandemic and now Cost of Living crisis.</p> <p>The Department and the NI Housing Executive acknowledge the adverse impact the proposed funding cut would have on vulnerable people and across Section 75 groups.</p>

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	<p>11.4 The Supporting People programme, delivered through the NIHE, is critical in supporting the most vulnerable citizens in communities across NI. Any reduction in the current level of funding to Supporting People will have far reaching impact across NI, including the likelihood of destabilising the community and voluntary sector which provides numerous invaluable services through this funding stream. Further cuts from this programme will be unsustainable as any efficiencies and streamlining have already been achieved and providers, such as Praxis Care, will be left making difficult decisions about service reductions and closures. In summary, jobs and vitals services will be lost. Through the Supporting People programme 43 services to approximately 563 individuals who fall within Section 75 category groups are delivered. These services provide vital support services that achieve positive outcomes through the delivery of housing support to some of the most marginalised and vulnerable people within Northern Ireland. These include mental health, learning disabilities, older people, dementia and young peoples services. Any reduction to the SP programme will expose marginalised groups by widening parity issues further as services will be forced to cherry pick referrals based on funding levels, or close services, leaving those with complex needs without SP services. It is worth noting that a large number of our SP services are located west of the Bann where it is already well established that health and social outcomes lag behind the rest of the country. Many Supporting People services are jointly funded with Department of Health (DoH) through the five HSC Trusts. Any change in funding through the SP programme will place additional pressure on the health budget which is already in a critical position. We would be concerned that any reduction in the SP budget could, sadly, also place financial pressure on the Department of Justice if people with mental ill health lose their vital support.</p>		<p>Since the Department's EQIA launched, there has been extensive engagement ongoing to consider other funding options and mitigate any impact to the Supporting People Programme in 2023-24.</p> <p>The Department bid for funding to support Supporting People Programme and its providers in 2023-24. This includes bids for increased demand, inflationary pressures, and uplifts for pay. Despite these bids, the Department received no additional funding in 2023-24 to address these pressures and the Department's overall Resource allocation was subject to reduction.</p> <p>The Department acknowledge Supporting People funding provides vital services and that the reduction will have adverse impacts on several of the groups protected by Section 75, as such</p>

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	<p>11.5 In the midst of a housing and homelessness crisis, with record high numbers of households with homelessness status, it would be completely illogical to cut resources to the Northern Ireland Housing Executive (hereafter NIHE) and to the Supporting People Programme (hereafter SPP). Taking this path will make an already challenging situation even worse. It is highly likely to have the effect of seeing more people fall over the edge into homelessness with all of the consequences this can have for them and for this society as a whole. We urge DfC to do everything in its power to ensure resources are not diverted away from homelessness services.</p> <p>11.6 A substantial proportion of the SPP budget, around 38%, goes towards funding homelessness services in Northern Ireland.<sup>19</sup> Before 2022/3, the budget for the SPP had been frozen at the same level as it had been in 2007. For fifteen years, year on year, the value of the fund had been eroded by inflation. While other comparable sectors (such as Health and Social Care) saw budget rises, SP funding stagnated. We could not see the rationale behind why the SPP has been differentially treated from other areas of the DfC budget in the Equality Impact Assessment. For example, considerable detail is given on cuts to the Discretionary Support Grants and the impact of a reduction in capital funding. In contrast, the section on SPP is vague and fails to capture the wide-ranging impact on individuals within a range of section 75 categories who are being supported through the SPP. a cut to the SPP fund should not even be countenanced as a possibility. The costs of taking this step would fall on those who are least able to afford it rather than those with the widest shoulders. Our member organisations who are funded through the SPP have told us that any cut to what they receive from the programme would have a deeply damaging impact on those they work with and their own services. In some cases, it could lead to service reductions, job</p>	consideration will be given to this when determining final budget allocations.	

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	<p>losses or even consideration of service closures. If this was to happen, the impact would cascade down throughout the housing and homelessness system placing more pressure on other agencies in both the immediate and long-term.</p> <p>The challenges around the recruitment and retention of staff will worsen further with all of the consequences this can have for the quality of service provision. As the Supporting People Strategic Needs Assessment published in 2021 made clear, a 14% gap already existed between the level of need out there and the supply of support available. This situation has only worsened since the Strategic Needs Assessment was published with the advent of the cost of living crisis. We are also cognisant of the wider budgetary picture across the NI Executive as a whole. Cuts to the budgets of other Executive departments will undoubtedly have consequences for SPP providers. A few examples include: longer waiting lists for health services such as mental health and addiction support; further delays in the courts and lack of rehabilitation services in prisons; impacts on asylum and refugee services; and difficulties with infrastructure slowing down house building. The challenges facing other Departments will spill over to impact homelessness services. It is often homelessness services that are left picking up the pieces from wider societal problems as the final backstop for people with no other options. The fear is that on this occasion services in the sector may not be able to provide the support which is needed due to a lack of resources. It is abundantly evident that any cut to the value of the SPP should be avoided. In the midst of a cost of living crisis with high and increasing numbers in temporary accommodation and growing social housing lists the possibility of a cut to the SPP fund should not even be countenanced as a possibility. The costs of taking this step would fall on those who are least able to afford it</p>		

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	<p>rather than those with the widest shoulders. We implore DfC to explore every alternative option before taking this misguided approach.</p> <p>11.7 Cuts to the Supporting People programme will have a long-term detrimental effect on service users as cuts to the service could affect the health and wellbeing of service users which will cost Government more in the long term.</p> <p>11.8 We would seek clarification on whether the baseline 5% cut proposed to Arm's Length Bodies is also being applied to SP. The SP programme funds almost two thirds of the of homeless services<sup>11</sup> and underpins vital supported housing services for around 20,000 vulnerable people in Northern Ireland. It allows them to live independently and helps prevent hospitalisation, homelessness or premature admission to residential or nursing care. The cut will present a challenging environment for providers and for people in receipt of support.</p> <p>11.9 Impact likely on the 19,000 people annually supported by SPP to live independently, including those experiencing homelessness, young, old and people with a disability, including mental health and learning difficulties.</p> <p>11.10 Concern over a reduction in funding to the Supporting People Fund which provides essential supports and services to some of the most vulnerable in our communities such as women and men who are victims of domestic violence, people with disabilities, and people experiencing homelessness.</p> <p>11.11 This programme is vital in assisting people to live independent lives. Any cut to this service will have a long term detrimental affect on service users.</p>		

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	<p>Again this is short sighted as cuts to the service could affect the health and wellbeing of service users which will cost Government more in the long term and add to existing pressures on the Dept of Health and other Government Agencies. Service users will almost inevitably be negatively affected by multi agency cuts also.</p> <p>11.12 Any cut to this service will have a long-term detrimental effect on service users. Cuts to the service could affect the health and wellbeing of service users which will cost Government more in the long term and add to existing pressures on the Dept of Health and other Government Agencies. Service users will almost inevitably be negatively affected by multi agency cuts also.</p> <p>11.13 The Council would be concerned about any proposed reduction in the ‘Supporting People Programme’ given its focus on supporting vulnerable people (particularly those experiencing homelessness, young people, older people, and people with a disability including mental health and learning disabilities) to live independently. As referred to in the consultation document, any reduction in funding will directly and disproportionately impact on a number of Section 75 groups. The Council would also highlight the possible disproportionate impact on vulnerable people across Belfast based on the current level of need and support provided in the city.</p> <p>11.14 Any cut to this service will have a long-term detrimental effect on service users. Cuts to the service could affect the health and wellbeing of service users which will cost Government more in the long term and add to existing pressures on the Dept of Health and other Government Agencies. Service users will almost inevitably be negatively affected by multi agency cuts also.</p>		



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		<p>11.15 This programme is vital in assisting people to live independent lives. Any cut to this service will have a long-term detrimental effect on service users. Vulnerable people need support. We need to support them to live independently and if possible, to reach them before they hit crisis point. Many of our vulnerable people come from areas of multiple deprivation and much more needs to be done to help them at an earlier stage.</p> <p>11.16 "Women's Platform are concerned re the funding of ""The Supporting People fund is particularly important from a preventative perspective. The services supported by the fund enable disabled people to live more independent lives and engage in society, which reduces demand for health and social care, including expensive residential care.</p> <p>11.17 The indicative allocation of £72.9m for the Supporting People programme, which provides housing support services to approximately 19,500 people, to enable people to live independently in the community, does not allow for unavoidable cost pressures experienced by provider organisations. This budget therefore will remain under significant pressure.</p> <p>11.18 If Supporting People services are not adequately funded, there will inevitably be closures given the lack of uplift from 2007/2008 and in particular some of the Section 75 groups affected may not be capable of living independently. This may place additional demands on the health care system and homeless services and result in services users being place in less suitable, higher costs care services. It is therefore important that:</p>	

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		<ul style="list-style-type: none"> <li>• more up-to-date data is considered in regard to the future viability of such services, considering the implications for accommodation and care where these are jointly provided.</li> <li>• given the vulnerability of the Section 75 groups supported through this programme, the adverse impact on each group should be measured and include consideration of: the ability of individuals to live independently if SP funding is cut; the future viability of services, particularly those that are jointly funded/provide accommodation. (Could individuals potentially lose their home? Will these section 75 groups be disproportionately impacted not only by the SP cut but also the knock-on effect in regard to their accommodation and care needs).</li> </ul> <p>11.19 A cross-departmental approach needs to be taken to any cuts proposed to Supporting People funding, particularly where Housing Support is not provided in isolation and the impact could result in an individual being adversely impacted as a result of the 'knock-on' effect arising, particularly in services providing accommodation, support and care. The impact of this on health and homeless services should be considered and a joint approach taken.</p> <p>11.20 In particular – older people, people with a disability, young people , and females with children will be significantly impacted by proposed cuts to the Supporting People and Social Housing Development programmes.</p> <p>11.21 Cutting services to those affected by domestic abuse will have an adverse effect on people.</p>	

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	<p>11.22 It's imperative that the Supporting People budget remains ringfenced at 2022-23 levels as failure to do so will have an immediate <b>serious impact on our ability to maintain service delivery at current levels, will increase growing waiting lists and push the risk of protecting these young people back into deprived communities</b> dealing with growing unrest and exploitation of the vulnerable.</p> <p>In order to maintain these vital services, <b>young people should be recognised as a specific group in need of housing support</b> in order to enable them to have a home which is safe and secure and that will provide them with opportunities to participate in society and reach their full potential.</p> <p>11.23 <b>Support People Programme</b> - Any reduction in Support People funding will affect Section 75 including older people and people with a disability including mental health and learning disabilities who would be disproportionately impacted. It is also appropriate to include 'men and women generally,' i.e., women who are at risk of domestic violence who out of the groups identified as having signification shortfalls in supply of housing support in 2020 have a service shortfall of 49%.</p> <p>11.24 A number of Section 75 groups including older people and people with a disability including mental health and learning disabilities may be disproportionately impacted by a reduction in funding.</p> <p>11.25 Tenants associations of Sheltered Dwellings not consulted on proposed cuts to Supporting People.</p>		

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	<p>Communities Minister has failed to regulate Housing Associations and thereby <b>failed to protect non-housing benefit tenants</b>. Only NIHE Tenants benefited from Minister's Rent freeze. Non-housing benefit tenants had to suffer huge rent increases levied by Housing Associations who completely ignored the freeze.</p> <p>11.26 <b><u>Review of data in Audit of Inequalities</u></b>: it is clear that there are gaps in terms of:</p> <ul style="list-style-type: none"> <li>• The experience and views of people with a disability in terms of support to access suitable housing.</li> <li>• Data reviewing the impact of changes where a person with a disability has multiple risk factors (e.g. a young person with a disability who also has mental health needs and is facing homelessness, or an older person with a disability with complex medical needs requiring specialist adaptations within their home).</li> <li>• Lack of outcome data for people with a disability. All schemes funded through Supporting People have to provide quarterly and annual outcome data (in relation to all individuals supported) however the Equality Assessment provides no summary outcome data to evidence impact of current funding arrangements. The Audit of Inequities references the outcomes for people with a disability (P10) but does not provide any information in terms of summary outcome data linked to current funding. The interventions supported through the programmes are designed to enhance improvements in a range of key</li> </ul>		

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	<p>outcomes, such as health, education, employability, community development and cohesion.</p> <ul style="list-style-type: none"> <li>Finally there is no cost analysis provided in the documents in terms of the likely long-term costs for other government departments (e.g. Department of Health) as a result of planned cuts in the Department for Communities budgets and supports for vulnerable groups.</li> </ul> <p><b>Adverse impacts</b> - Potential devastating impacts on lives of <b>most vulnerable groups</b> in our society, including people with a disability. For many people, there is the potential for <b>multiple and cumulative impacts</b>, through different budget cuts, within and outside departments.</p> <p>We believe that this is a <b>short-sighted, short-term approach</b> given the potential impact of these proposed cuts and the <b>likely rise in costs for other government departments</b> as a result of cuts to the Department for Communities, <b>particularly in DoH</b>, given the duty of care it has to respond to and support people in crisis (as a result of a lack of basic support in terms of housing, employment and benefits). E.g. if Supporting People funding for housing support was cut, either Trusts would have to meet the shortfall or the person supported would lose their individualised support with a return to outdated and archaic congregational living or increase in expensive hospital admissions.</p> <p>The cuts being proposed:</p> <ul style="list-style-type: none"> <li>will expedite the dismantling of essential preventative support available to the most vulnerable in our society.</li> </ul>		

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		<ul style="list-style-type: none"> <li>could result in essential, commissioned services – such as supported living services that provide safe and effective care no longer being financially viable and providers having to cease contract arrangements with HSCTs</li> <li>if providers are forced to cease contracts with HSCTs, this could result in expensive, alternative placements (e.g. in GB)</li> <li>are inconsistent with all government policy positions and strategies in terms of strengthening preventative, community-based approaches to health and well-being. Not only are the plans morally and ethically unacceptable and likely to result in significant harm and distress to the most vulnerable and marginalised people in our society, they make no business sense as the total costs for government (across all departments) are likely to far exceed any proposed savings. Our view is that given the potential impacts of implementing these plans, no overall saving will be achieved.</li> </ul>	
12	<b>Urban Regeneration</b>	<p>12.1 It is important that our city centres become places for living. This can only be achieved with DfC financial investment in urban regeneration initiatives and projects. Failure by DfC to invest will result in cities and towns declining, adversely impact on local communities, loss of investment in reduced growth.</p> <p>12.2 Capital and Urban Regeneration – We would highlight the public consultation on A Bolder Vision and the requirement to provide fully accessible and prioritised investment to Derry NRA'S to enable inclusive growth and investment, and to reduce severance to communities and the wider city.</p>	With DfC facing a Capital funding gap of £59m in 2023-24, the Department acknowledges that managing a Capital pressure of this magnitude will undoubtedly have a significant and adverse impact on the Department's ability to meet demand for capital programmes which support public services in 2023-24.

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		<p>Funding - Sub optimal capital financing – limitations to in year capital funding. Prioritisation of investment aligned to agreed policies and strategies. Ensuring the region has access to the same funding as financing for regeneration as other UK cities</p> <p>Treatment of revenue and capital to address resource shortfall.</p> <p>Collaboration – commitment to work collaboratively with Council, private sector and the community sector to unlock key challenges to the development and regeneration of the city.</p> <p>12.3 Capital and Urban Regeneration – the public consultation on A Bolder Vision and the requirement to provide fully accessible and prioritised investment to Belfast city centre to enable inclusive growth and investment, and to reduce severance to communities and the wider city. The main impacts will be accessibility issues to the city centre, having a limited impact on investment for jobs and inclusive growth, and a continuation of the current severance issues to opportunities within the city centre. We are concerned that the current in year capital financing is prohibiting the growth of the city (Belfast) and indeed the region.</p> <p>12.4 We encourage a commitment to work collaboratively with Councils, private sector and the community sector to unlock key challenges to the development and regeneration across NI.</p> <p>12.5 The Urban Regeneration programme - if Belfast is not supported to thrive then NI will collectively lose out on FDI, tourist spend, small business cluster</p>	<p>The Department will consider the points raised when prioritising its Final Capital budget allocations for 2023-24, while working to ensure allocations will be made in the most effective way possible to support areas most in need.</p>

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		<p>development, cultural vibrancy etc and we will continue to lose our young people to cities which provide a much more attractive mix in other jurisdictions.</p> <p>12.6 Belfast City Council’s draft Economic Strategy for Belfast (2022-2030) aims is to support our sustainable and inclusive growth ambitions for the city. Cuts to DfC’s budget will have an adverse impact on our delivery of interventions to address skills gaps (Action 6) and in developing inclusive employability programmes (Action 7). It will severely hamper our city’s ambitions in:</p> <ul style="list-style-type: none"> <li>• Creating inclusive pathways to jobs and careers by 2030 for those further back in the labour market and cut access to better jobs for those who are underemployed;</li> <li>• Reducing the proportion of economically inactive people of working age (by 2030 to 23 per cent from 30.1% in 2020), in alignment with the Belfast Agenda;</li> <li>• Cutting the proportion of the Belfast working-age population with no qualifications to 12%, reducing the working-age economic inactivity rate (excluding students) within the city to 18% and increasing the working age population who have attained Level 3-5 qualifications to 56% as well as doubling the number of Belfast residents entering the labour market each year with mid-level skills (at NQF levels 3-5).</li> <li>• Reducing the proportion of working age population with no qualifications from 14.2% in 2017 to 10% by 2030, in alignment with</li> </ul>	



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		<p>the Belfast Agenda . The Belfast Agenda 2015-2035 sets out key strategic ambitions for the city. Working and Learning is one of the key priorities of the agenda which acknowledges that our skills base is vital to competitiveness, productivity, inclusiveness and growth; and</p> <ul style="list-style-type: none"> <li>Supporting the inclusive growth ambitions of the Council by targeting interventions on key cohorts: young people not in education, employment or training (Proportion of school-leavers entering employment, education or training), residents not in employment, residents with low skills levels (this will be measured by the proportion of working age population who have attained Level 2 or above) and in work, low earning residents.</li> </ul> <p>12.7 Highlight the public consultation on A Bolder Vision and the requirement to provide fully accessible and prioritised investment to Belfast City Centre to enable inclusive growth and investment, and to reduce severance to communities and the wider city. The main impacts will be accessibility issues to the city centre, having a limited impact on investment for jobs and inclusive growth, and a continuation of the current severance issues to opportunities within the city centre.</p> <p>12.8 Stopping urban regeneration investment could have a disproportionate impact in younger people. Urban Regeneration funding is crucial for the safety and wellbeing of those who live, work and visit the town centres. Absence or reduction of this funding will impact on social inclusion for section 75 groups. The Town Centres are the hub to bring people together, lack of investment will impact on economic growth, employment and wellbeing of citizens.</p>	

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13	<b>Voluntary &amp; Community Sector</b>	<p>13.1 (Cuts to ALB's) Will disproportionately restrict access for those from deprived areas, with disabilities, older people or migrant workers/ethnic minorities. Will impact on children, especially from deprived households, who often use libraries to access computers, the internet, learning resources or even as a safe space for study and who access sports and as a diversionary alternative to Anti-Social Behaviour.</p> <p>Will disproportionately restrict access to justice or representation by the children, older people and those relying on charitable support e.g. those from deprived areas, with disabilities, older people or migrant workers/ethnic minorities.</p> <p>13.2 In making decisions in areas under the responsibility of the Department for Communities, particularly in the areas of arts it is worthwhile to ensure that cuts to community-based organisations do not mean that these organisations can no longer function effectively. The loss of funding provided by the Arts Council may result in the entire centre having to be closed.</p> <p>13.3 Cuts to the Commission's budget will impact its capacity to process the closure of Charities leading to charitable assets potentially leaving the sector and not being reassigned to other charities who will have beneficiaries across the Section 75 categories. It will also affect the Commission's capacity to address concerns from each of the S75 groups, process timely registrations and process investigations to protect individuals from mismanagement and misconduct.</p>	<p>The Department recognises the vital services provided by the Voluntary and Community sector through a number of programmes (Supporting People Programme is dealt with separately) and on the basis no cuts too these programmes are planned as part of the 2023-24 budget allocations.</p> <p>The Department recognises the important role of our ALBs and their valuable work, particularly supporting all Section 75 groups, and has sought to minimise the impact on ALBs by not passing on the full extent of the cut it faces in 2023-24. As already stated, the Department will continue to work with ALBs to minimise any impact on service delivery.</p>

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	<p>13.4 Arm's length bodies play a pivotal role in the economic, health and wellbeing of our society. Any reduction in these services would be very short sighted and will have a negative long-term affect. Any reduction of funding to USEL will have a detrimental impact on the lives of people with disabilities particularly those living in areas of multiple deprivation.</p> <p>13.5 Within the EQIA there is reference to possible reductions in funding for Charities Commission NI, NI Commissioner for Children and Young People and Commissioner for Older People NI, would be concerned that reductions to these areas of work may impact the statutory work they carry out and therefore adversely impact on section 75 groups including children, young people and older people.</p> <p>13.6 VCS cuts would have catastrophic effect on the ability to deliver much needed services and programmes within communities. VCS interventions, usually measured in the longer term, represent excellent value for money - changing the lifepath trajectory of even one young person can more than compensate for literally years of societal costs which would otherwise be incurred.</p> <p>13.7 VCS sector cuts will impact on services to children and young people up to 18 years.</p> <p>13.8 With the Pathway Fund set to cease in June 2023, there will be a loss of local early years education and learning services in 187 of the most disadvantaged areas in the North. This will have a significant negative impact on over 10,000 children aged 0 - 4 years old.</p>		

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		<p>Our service is situated in the 3rd most deprived area in the North.</p> <p>Our children are Covid children who entered our setting in September 2022 with:</p> <ul style="list-style-type: none"> <li>• Speech delays</li> <li>• Lack of interaction with their peers – unable to socialise with their peers</li> <li>• No routine</li> <li>• Undetected traits of additional needs.</li> </ul> <p>The impact of these cuts will have a long-term detrimental effect on our organisation. What this will mean for us, is as follows. The loss of:</p> <ul style="list-style-type: none"> <li>• childcare jobs</li> <li>• 12 pre-pre child places</li> <li>• 12 creche places</li> </ul> <p>Our family support offers the following service within the Outer West Neighbourhood Renewal area:</p> <ul style="list-style-type: none"> <li>• Life start home visiting early intervention programme to 150 parents/carers of children birth to 5 years. This programme has proven through a longitudinal study to support parents create the best possible environment for their child to develop and is delivered to parents on a one-to-one basis in their own home.</li> </ul>	

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	<ul style="list-style-type: none"> <li>Life start 'At Home In School' programme to 50 families. This programme is a transition programme for parents of children of Nursery, transitioning into P1.</li> <li>Our Family Support Hub, which deals with 350 families of children falling below the statutory thresholds for intervention.</li> </ul> <p>The action that we are putting forward is that early intervention needs investment, rather than cuts. By cutting DE and DfC budgets, this will leave our Neighbourhood area in a worse situation, by rolling it back 30 years.</p> <p>13.9 The Department should continue to ensure that the role and impact of the independent advice network is recognised and respected. Withdrawal of funding support by the Department to some third party organisations may lead to viability issues or closure of the bodies (more information needed on the likelihood of this option taking place and which organisations may be affected). The Department should ensure transparency, due process and a challenge mechanism for any third party organisations that may see their funding threatened, as a mark of respect for staff and service users.</p> <p>13.10 Without funds at present Women Centre Derry would be closed and women and children would be abandoned within the Derry City and Strabane District Council. As these organisations that offer specialist support services to Section 75 groups have been hugely impacted, further reductions to their funding would result in closures leaving Section 75 groups vulnerable and abandoned.</p>		

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	<p>13.11 Departments could develop a more holistic approach to funding in order to create long term efficiencies. In line with 2.2 of the Equality Impact Assessment, there is little data to support the requirement for the Department to have “due regard to the desirability of promoting good relations between people with different religious beliefs, different political opinions or from different racial groups”.</p> <p>Recent data published by NISRA on T:BUC showed that community relations are worse now than they have been in over a decade.</p> <p>13.12 Although Neighbourhood Renewal has been retained this will not mitigate the effects of the cuts on the poorest areas and communities including all the Section 75 groups experiencing multiple and overlapping disadvantages.</p> <p>13.13 Housing Rights notes that community and voluntary sector organisations funded by the Department for Communities are not expressly identified in the draft EQIA, other than in reference to ‘Third party’ organisations, which it is assumed covers C&amp;V sector funded organisations. Housing Rights would urge the Department to strongly consider the impact on C&amp;V sector organisations and on the communities they support – many of whom are already experiencing inequality. C&amp;V funded organisations who rely on core funding from the Department, including Housing Rights, exist in service of the promotion of equality, prevention of homelessness and relief of poverty.</p> <p>13.14 One of the things that community sector does most effectively is enable and provide access to the essential services provided by DfC. The DfC is well aware of the evidence that many in the Section 75 groups and those living in the most deprived areas communities find it harder to access</p>		

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		<p>services and benefits and many can drop through the safety net. The community sector reaches those hard to reach groups. Community groups are able to recognise the complexity and totality of people’s experience and therefore play a critical role.</p> <p>13.15 Social funding for community groups means helping the most marginalised groups access the services provided by DfC. This includes especially those in areas of multiple deprivation. The community sector helps DfC link to those who are most in need of their services but who often slip between the cracks of state provision. We advocate for actions that preserve the community infrastructure that helps DfC deliver to the poorest and most marginalised communities. The cuts that have already happened along with the proposed cuts will in our view severely weaken the community and voluntary sector infrastructure and result in long term and irreversible harm.</p> <p>13.16 Departments must understand that the uncertainty in funding is already having an impact on retention of staff and the delivery of services, and cutting funding will decimate the vital VCS infrastructure in some cases irreversibly or in such a way that it will not be able to be restored should funding be increased again in the future.</p> <p>13.17 We also wish to stress that not only is there a need for sufficient staffing levels within the Department to better support people with the complexity of the benefits system and with Universal Credit but there is equally a need for sustainable, long-term funding for voluntary and community sector partners to help with this work.</p>	

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	<p>13.18 The Community Development section receives funding from the Department for Communities' Voluntary and Community Division (VCD) under the Community Support Programme (CSP). The CSP provides funding to councils to support council-managed community development and advice services. In delivering the Community Support Programme (CSP), Councils match fund the Department for Communities' award, and overlay lower level objectives and targets to shape localised programmes for individual council areas. Councils are responsible for ensuring their programmes align with the high-level objectives for CSP. The Community Support Programme which is funded by the Department is not mentioned within the EQIA budget 2023-24, however, DCSDC would like to emphasise the importance of this funding allocation to Councils to support the delivery of Community Development to the Community &amp; Voluntary Sector. The CSP supports a range of the section 75 groupings, if cuts are to be made to the CSP budget this would have detrimental implications to the Community &amp; Voluntary sector and in-particular section 75 groupings.</p> <p>13.19 Each of the impacts has been presented individually but the exercise fails to examine the cumulative and multiplicative impact of all the cuts on a geographic basis. Those on the margins who are members of S75 groups will find little support from government agencies while also seeing the community and voluntary sector cuts with e.g. adverse impact on their accessing support from advice centres, food banks and playgroups who have also been cut back. These impacts will fall on a group struggling already to cope with a cost of living crisis, energy and food inflation at record levels and housing stress across the DCSDC area.</p>		



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	<p>13.20 The community sector reaches those hard to reach groups. Community groups are able to recognise the complexity and totality of people’s experience and therefore play a critical role. The proposed cuts will severely reduce the capacity of the sector. The budget delays have already had an effect on the community sector’s capacity, the most essential ingredient of which is staffing. These will cause long term unforeseen and unplanned effects.</p> <p>13.21 The proposed cuts will severely reduce the capacity of the sector. The budget delays have already had an effect on the community sector’s capacity, the most essential ingredient of which is staffing. These will cause long term unforeseen and unplanned effects.</p> <p>13.22 Social funding for community groups means helping the most marginalised groups access the services provided by DfC. This includes especially those in areas of multiple deprivation. The community sector helps DfC link to those who are most in need of their services but who often slip between the cracks of state provision. We advocate for actions that preserve the community infrastructure that helps DfC deliver to the poorest and most marginalised communities.</p> <p>13.23 Multiple Cuts from all departments will impact on those most vulnerable in society including the communities that reside in Areas of Multiple Deprivation (as defined by NISRA). This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p> <p>13.24 Social funding for community groups means helping the most marginalised groups access the services provided by DfC. This includes especially those</p>		

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	<p>in areas of multiple deprivation. The community sector helps DfC link to those who are most in need of their services but who often slip between the cracks of state provision. We advocate for actions that preserve the community infrastructure that helps DfC deliver to the poorest and most marginalised communities.</p> <p>13.25 Any reduction on service will have a detrimental impact on areas of deprivation. Multiple Cuts from all departments will impact on those most vulnerable in society including the communities that reside in Areas of Multiple Deprivation (as defined by NISRA). This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p> <p>13.26 The Department has been very aware of and responsive to the particular needs of the Deaf and hearing-impaired community and the need for additional support to try to rebalance the marginalisation and discrimination faced by this community, it is therefore deeply concerning to learn about cuts and cost saving measures that are likely to stall that good work and cause further disadvantage. Any attempt to top slice budgets on an equal basis will have the effect of furthering disadvantage to the Deaf and hearing-impaired community. A reduction in resources is therefore likely to impact negatively. It is critical that this is taken into consideration when examining the impact of cuts in services and support. The Deaf and hearing-impaired community are at a disadvantage across all sectors due to the absence of appropriate linguistic infrastructures to support their inclusion and therefore are interfacing with and require the support of a wide range of services provided by the Department. It is of critical importance that consideration is given to maintaining and potentially increasing financial support to voluntary sector organisations who can step in and mitigate against the disadvantage created</p>		

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		<p>by cuts in direct services and those provided by arms-length bodies. The support of the voluntary sector during this time is essential in mitigating against further disadvantage and discrimination but also offers value for money. The cost of supporting increased initiatives in these organisations with existing infrastructure and networks will be more cost effective than the provision of adjusted support within the Departmental and arms' length bodies and therefore makes economic sense during this economically challenging times.</p> <p>13.27 Removal of these services is likely to lead to additional demand on health and social care services, as well as on the benefits system, not only by women themselves, but their wider families, as loss of these support systems impacts on women's capacity to manage families.</p> <p>13.28 One of the things that community sector does most effectively is enable and provide access to the essential services provided by DfC. The DfC is well aware of the evidence that many in the Section 75 groups and those living in the most deprived areas communities find it harder to access services and benefits and many can drop through the safety net. The community sector reaches those hard to reach. groups. Community groups are able to recognise the complexity and totality of people's experience and therefore play a critical role. The proposed cuts will severely reduce the capacity of the sector. The budget delays have already had an effect on the community sector's capacity, the most essential ingredient of which is staffing. These will cause long term unforeseen and unplanned effects.</p>	

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	<p>13.29 Any reduction in support to the neighbourhood renewal programme would target the most vulnerable at a time of hardship and would have a direct impact on section 75 religious and political background.</p> <p>13.30 DfC should retain the relatively small amount of funding allocated to Neighbourhood Renewal Areas. Reducing the amount of funding allocated to groups funded via DFC's NRA budget would have a severe detrimental impact on local communities and would be counter-productive as it would inevitably lead to a greater financial cost to other government depts such as health, policing, justice system, education, etc.</p> <p>A small preventative pot of funding for NRA will mean future budgets will not be under as much pressure to meet the inevitable need to be reactive to meet the obvious social needs that will prevail. Whilst this year's budget is of course forefront, it is also important to be cognisant of the many negative longer-term impacts that cutting NRA budgets will bring in the future.</p> <p>13.31 The focus of the work of the voluntary sector is often on early interventions and prevention and so cuts will have a bigger impact on the needs of vulnerable people and increase costs in future years. The cuts at present appear to be a short term response and they are not focused on longer terms solutions to chronic issues. There will also be a knock on impact to public services which are being supported by the sector. Groups impacted are likely to be children and young people, people on low incomes, older people, people with disabilities and people from LGBTQ+.</p> <p>Holding funding at 22/23 levels is still a real terms cut for organisations, who need a funding model which provides greater sustainability in the longer term</p>		

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		<p>and allows investment in the sector which delivers so much on behalf of vulnerable groups.</p> <p>The sector has suffered chronic underfunding over a long period. There is no fat left to cut so these proposed funding reductions will have a devastating impact on the sector.</p> <ul style="list-style-type: none"> <li>• The voluntary and community sector delivers many services on behalf of government, often cheaper and more efficiently than government can deliver directly.</li> <li>• The sector is very good at using the core funding provided by government to leverage other funds and this wider funding is put at risk by these cuts.</li> <li>• In many cases these cuts represent a move away from long term policy positions supported by Ministers.</li> </ul>	
14	<b>Discretionary Support</b>	<p>14.1 The cost-of-living crisis has meant that the discretionary support grant applications have risen to unprecedented levels. The current demand has been forecasted at £40m in 2023-24 but the budget allocation is only £13.7m – just 34% of what is needed.</p> <p>14.2 Discretionary Support (DS) applicants who find themselves in extreme, exceptional or crisis circumstances which present a significant risk to their health, safety or well-being need to be able to rely on this scheme to escape destitution; and have less recourse to crisis support via the Discretionary Support Scheme as is in place in GB. For example, we understand that DWP has secured the necessary additional resources to deliver on the challenging</p>	<p>With DfC facing a Resource funding gap of £111.2m (15.5%) in 2023-24, the Department acknowledges that managing a Resource pressure of this magnitude will undoubtedly have a significant and adverse impact on the Department's ability to meet demand for public services in 2023-24.</p>

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	<p>‘Move to UC’ agenda and the Chancellor has bolstered the GB Household Support Fund to the tune of an additional £1bn. DS Grants awards being scaled back which will not only put at risk the Department’s ability to help address the basic needs of people who present with hardship and in crisis, but potentially impact on the ability of people affected by ‘Move to UC’ to claim a UC Contingency Fund grant. The Department should commit to ensuring that anyone who meets the requirements for a UC Contingency Fund grant are informed about, supported to apply (including referral to the independent advice network where necessary) and paid as appropriate under the Regulations.</p> <p>14.3 Discretionary Support grants can serve as an invaluable lifeline to households who may be on the edge of homelessness. With so many struggling to make ends meet, this cut will be hugely damaging to many of the poorest households living here. We would submit that this cut runs against the strategic shift we need to see towards preventing homelessness before it happens rather than reacting to it after the fact.</p> <p>14.4 Any cutting back of DS will undermine the Minister's decision to implement the recommendations from the DS Review and will plunge families into deepening crisis.</p> <p>14.5 Cuts will impact on those with dependents, with disabilities, migrant workers, different age-groups, men-women and religious/political beliefs. East Belfast has two areas, (Inner East and Tullycarnet) which are designated Neighbourhood Renewal areas and face high levels of deprivation. Reductions in Discretionary Support Grants will impact therefore</p>		<p>The Department’s received full funding for existing Welfare Mitigation in its 2023-24 Budget Settlement. This includes the funding for Universal Credit Contingency Fund and for the Advice Sector to support those impacted by the Move to Universal Credit. People applying for Discretionary Support help while awaiting their first Universal Credit payment, including those transitioning under Move to UC will therefore not be affected.</p> <p>In considering allocation of the Department's constrained 2023-24 Budget careful consideration will be given to balancing priorities, need and available funding to maximise the supports the Department provides to those who need it most.</p> <p>The Department bid for funding in 2023-24 to implement New Mitigations (including recommendations from the DS</p>

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		<p>more heavily on those with dependents, older people and people with a disability who in these areas are more likely to be disadvantaged.</p> <p>14.6 Cuts to the Discretionary Support Fund, potential delays to benefit payments and access to support via Departmental Offices which will impact on people with the lowest incomes and those most impacted by the cost-of-living crisis. Sinn Féin believe that people are entitled to a social security system that is fit for purpose and that staff welfare and service provision should be at the highest standards possible. This involves having the necessary resources and IT to allow this to happen.</p> <p>14.7 In 2021 DfC concluded a review of Discretionary Support and made recommendations which were accepted by the Minister. It was recognised that DS was a vital lifeline to families in immediate crisis. Any cutting back of that service will not only undermine the Ministers decision to implement the review recommendations but will plunge families into deepening crisis. Discretionary Support was increased to help deal with the pandemic and this needs to continue now to deal with the cost of living crisis. Any reduction on service will have a detrimental impact on areas of deprivation. Multiple Cuts from all departments will impact on those most vulnerable in society including the communities that reside in Areas of Multiple Deprivation (as defined by NISRA). This approach runs contrary to the aims and objectives of the departments People and Place Strategy.</p> <p>14.8 The presumption is that the anticipated £40m was based on informed data which identified evidence need at this higher amount therefore we concur with the departments analysis of the hardship inflicted on section 75 groups as a result of any reduction to available.</p>	<p>Review). The Department received no funding for implementation of recommendations arising from the DS Review, in the absence of funding and pressures facing the Department in 2023-24, progressing this work is not affordable and will be a matter for an incoming Executive. It is anticipated a reduction in the DS budget will impact people across the section 75 groups.</p> <p>The Department is currently considering available data to better understand the likely impact and to identify any mitigating steps that may be taken.</p> <p>The Department will also conduct a DS specific EQIA to better understand the impact of the reductions and will review its approach in the Autumn including consideration at that time of findings of the specific DS EQIA</p>

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		<p>14.9 Any cutting back of that service will not only undermine the Ministers decision to implement the review recommendations but will plunge families into deepening crisis. Any reduction on service will have a detrimental impact on areas of deprivation.</p> <p>14.10 The proposed cuts to Discretionary Support are hugely concerning impacting on some of the most vulnerable in our society (women adversely affected).</p> <p>14.11 "Cuts to Discretionary Support may mean that people can't afford to buy the food or heat they need which may cause them to become physically or mentally ill which could impact on the health service and cuts to Supporting People may have implications for women escaping domestic violence situations if they are unable to access the accommodation they need which has implications for the forthcoming Violence Against Women and Girls Strategy. Taking a silo approach to these cuts by individual Departments is further contributing to the problem.</p> <p>14.12 We draw the Department's attention to the legal consequences of cuts to discretionary support (DS) which we see as constituting a risk to the rights under Article 3 (right to protection from inhuman and degrading treatment) and Article 8 (right to family life) of the European Convention on Human Rights (ECHR) for people claiming UC for the first time. DfC has already recognised the risk of destitution associated with a new UC claim and partly mitigated it through the UC contingency fund (UCCF) payment, delivered through DS. Any cut to the DS budget will impact on the funds available for</p>	<p>The Department's 2023/24 Budget will be targeted to ensure continued support for the Neighbourhood Renewal Programme.</p> <p>In considering allocation of the Department's constrained 2023-24 Budget careful consideration will be given to balancing priorities, need and available funding to maximise the supports the Department provides to those who need it most.</p> <p>The Department is committed to supporting those people facing the most difficult and challenging circumstances. As part of the implementation of a reduction in the DS budget the Department will seek to continue providing the same level of protection for people in specific circumstances,</p>



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	<p>this payment, restoring the risk that the UCCF payment is designed to off-set. Northern Ireland has been relatively well served by DfC's actions in introducing the crisis support currently available through the DS scheme. This includes the UC contingency fund, which has not been without its shortcomings. The recent DfC commissioned reviews of DS and welfare mitigations recommended additional investment in discretionary support grants and the contingency fund, but the consultation document clearly envisages the opposite direction of travel for 2023-24. This appears to be at odds with the direction that the Minister was considering in commissioning a review on how the DS scheme in particular could be improved. The EQIA notes that the projected demand for 2023/2024 is in the region of £40 million. If the DS budget prioritises loans, it should be noted that these cannot fully compensate for reduced availability of grants as the poorest applicants are less likely to be deemed capable of making repayments. A DS budget cut that results in the Department having to curtail benefits means DS will be unable to meet the need for crisis or emergency support. This is where the possibility that ECHR rights will be breached arises. We strongly recommend that the maximum possible resources are devoted to DS, including the UC contingency fund, at this time, and that additional funds are allocated in-year if this proves necessary.</p> <p>14.13 Any reduction on service will have a detrimental impact on areas of deprivation. Multiple Cuts from all departments will impact on those most vulnerable in society including the communities that reside in Areas of Multiple Deprivation.</p> <p>14.14 "Whilst the Council recognise the need to operate within budgetary constraints, the scaling back of the discretionary support grants scheme –</p>	<p>including those fleeing domestic violence.</p> <p>The Department will continue to meet all statutory obligations on the delivery of social security benefits and other financial assistance to those people most in need.</p> <p>Universal Credit Contingency Fund grants will continue as normal - assisting all those eligible while awaiting their first Universal Credit payment. The Department will ensure all decisions are in line with the Northern Ireland (Interim Arrangements) Act, which received Royal Assent on 24 May 2023.</p> <p>The 2023-24 Budget Settlement presents significant challenges for all NICS Departments to manage the forecasted level of pressures in 2023-24. The Department</p>	

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	<p>during a cost-of-living crisis – will inevitably impact on those individuals and families most in need. The programme provides essential and time critical support and any scaling back of this grant should be limited as it will put at risk the ability to help address the basic needs of people who present with hardship, particularly people with dependents, older people and people with a disability."</p> <p>14.15 Any cuts to the DfC Discretionary Support fund would impact on many people with a learning disability, who would be further impoverished as a result.</p> <p>14.16 The presumption is that the anticipated £40m was based on informed data which identified evidence need at this higher amount therefore we concur with the departments analysis of the hardship inflicted on section 75 groups as a result of any reduction to available.</p> <p>14.17 Any cutting back of that service will not only undermine the Ministers decision to implement the review recommendations but will plunge families into deepening crisis. Women are more likely to claim Discretionary Support and therefore would experience a greater adverse impact if the cuts to Discretionary Support proposed in this EQIA go ahead.</p> <p>14.18 Discretionary Support was increased to help deal with the pandemic and this needs to continue now to deal with the cost-of-living crisis. DS should be prioritised as the crisis support system. This is critical to the state's obligations in upholding fundamental rights.</p> <p>14.19 Recommend that UC Contingency Fund is protected given impending migration to UC. Recommend that any proposed changes to existing</p>		<p>acknowledges the impacts budget cuts will have on vulnerable people and Section 75 groups.</p> <p>It is anticipated a reduction in the DS budget will impact people across the section 75 groups. The Department is currently considering available data to better understand the likely impact and to identify any mitigating steps that may be taken.</p>

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		<p>policy/eligibility criteria for DS are considered in light of guidance from SoS to Departments re decision making.</p> <p>14.20 Cuts to or the reduction in rates of DS disproportionately impact on disabled people who more likely to be on lower incomes and more likely to live in poverty.</p> <p>14.21 In 2021 DfC concluded a review of Discretionary Support and made recommendations which were accepted by the Minister. It was recognised that DS was a vital lifeline to families in immediate crisis. Any cutting back of that service will not only undermine the Ministers decision to implement the review recommendations but will plunge families into deepening crisis.</p> <p>14.22 It is also worth highlighting that cuts like the proposed cut to Discretionary Support Grants, cuts to support for disabled people and the housing cuts are all in the context of the ongoing inadequacy of the universal credit system. Responses such as the DS Grant system are crucial and we do not believe the cut to this funding is sustainable.</p> <p>14.23 Discretionary Support (DS) Grants - Reducing the number of times an individual can apply for a DS grant may be unavoidable considering the budget constraints. However, it is important that special consideration be given to those people living with disabilities or caring for those with disabilities as pressures on running medical equipment etc, especially in a cost of living crisis, may put a huge strain on the household budget.</p>	

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	<b>Theme</b>	<b>Summary Comment / Points Raised</b>	<b>Response</b>
<b>15</b>	<b>Other / General Budget</b>	<p>15.1 Council is concerned at the decrease in the Department Net Capital budget given the priority investment projects which haven't come forward in Belfast in recent years. Council is concerned that the current in year capital financing is prohibiting the growth of the city and indeed the region.</p> <p>15.2 Investment in existing buildings and infrastructure is likely to be a more cost-effective capital response and will also ensure an equal playing field for well-established organisations with an existing base. The deaf community are familiar with these facilities and have an affinity to them and therefore are more likely to utilise them than a new, unfamiliar building. However, it is vital that these spaces are maintained as safe, attractive, accessible services which act as a hub for the community to socialise and learn together enabling the establishment of effective peer support, minimising isolation, and promoting a sense of community and belonging. The return on any capital investment by the Department in such services and facilities is likely to generate significant long-term benefits in terms of the achievement of governmental and departmental goals around inclusion and equality. Whilst it is understandable in the current financial climate that cost saving measures need to be introduced it is disappointing to learn the extent of those cuts and the plans to implement them.</p>	The Department will consider the points raised when prioritising its Final Capital budget allocations for 2023-24.
<b>16</b>	<b>Other / General Budget</b>	<p>16.1 We would call on the Department to publish their Stage 7 EQIA Report which will show how they have taken the consultation responses into consideration in order for the sector to have clarity on the decision-making process.</p> <p>16.2 One of the biggest flaws in the EQIA is the siloed approach wherein each department only considers its own areas of work and doesn't consider the</p>	The Department recognises that the closure of the Affordable Warmth Scheme will have a severe impact especially given current high fuel prices. The Department has therefore announced action to protect the

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		<p>effect of proposed actions on the activities of other departments. Advocate for immediate action to take a cross departmental comprehensive approach which examines the cumulative and overarching effects of cuts from all the departments.</p> <p>16.3 The cuts to funding being contemplated—including to the Supporting People Programme; third party organisations providing community and voluntary networks; Arm’s Length Bodies providing tailored support; and the Affordable Warmth Scheme—would disproportionately hit older citizens. As older people are less likely to be in paid employment, experience higher levels of poverty and endure increased levels of serious long term health conditions, such cuts would represent an unfair burden on this section of society.<sup>1 2</sup> Therefore, it is vital that everything should be done to avoid the harm inherent in the cuts outlined in the EQIA.</p> <p>16.4 Programmes to tackle poverty and disadvantage. These programmes are critical to support families on low incomes to meet the basic material needs of children through maximising incomes from benefits and employment. While some of these general areas of responsibility were referred to in the EQIA, there were no specific references to these programmes, and it is unclear how they will be affected – adversely or not - by the cuts to the DfC budget.</p> <p>16.5 The Equality Commission advises the Department to include a summary of the actual data used from the named sources in its Stage 7 EQIA report and assessment of potential impacts on the Section 75 categories.</p>	<p>Affordable Warmth Scheme which will enable it to remain open this financial year. This has been achieved by removing targeting from the scheme and closing the Boiler Replacement Scheme, which will reduce the administration costs of the Scheme and augment the budget.</p>

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	16.6	The EQIA references the reallocation of any additional funding that may become available in-year, however it is unclear whether there has been any current consideration given to mitigating adverse equality impacts of the proposals by redistribution of internal budgets. Reallocation of funding in year may be of little help to organisations impacted by DfC funding cuts who may have to reduce or stop services, make staff redundant etc. in the interim period.	
	16.7	The Department has not included how it proposes to monitor the impact of budget decisions on Section 75 groups. Rather, it commits to taking account of 'adverse impacts...identified through this assessment process' to inform 2023-2024 budget allocations and using its findings to inform further mitigations, revised budget allocations and in-year bids.	
	16.8	It is recommended that the Department for Communities undertake a Rural Needs Impact Assessment to set out the impact of the budget proposals, and how it proposes to mitigate this impact, upon people living in rural areas.	
	16.9	Any proposed cuts to support services will have a direct impact on the LGBTQIA+ community, due to their lived experience and the intersectionality of that experiences. The evidence presented to Department via the expert panel report on LGBTQI+ Strategy has shown that this community experience higher levels of hate crime, discrimination, violence and inequality than others in Northern Ireland.	
	16.10	The Departmental Budget has been well thought through in terms of the taking appropriate steps to not negatively impact on the support it provides	

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		vulnerable and marginalised sections of our community through the work of community-based organisations.	
17	<b>Welfare Mitigations</b>	<p>17.1 Cause for concern that no funding has been allocated towards new Welfare Mitigations.</p> <p>17.2 In this EQIA children and young people under 18 are not considered under the ‘age’ category. It is only under the category ‘People with or without dependents’ that children are mentioned in relation to childcare, and in the ‘Religious Belief’ category that the impact of not mitigating the Two-Child Limit is considered. The EQIA did not, however, provide a detailed list of these important interventions, or indicate whether it was proposed to continue their funding. NICCY has identified 28 programmes funded from the DfC DEL funding, largely drawn from the Delivery Plan for the Children and Young People Strategy 2020-2030, although this list is likely to be incomplete. If any of these are cut, this would have a detrimental impact on children and young people, particularly disadvantaged and vulnerable children and young people.</p> <p>17.3 We are firmly of the belief that strengthening the mitigations package is essential to provide protection especially relating to women from financial hardship and poverty and also to help with economic recovery.</p> <p>17.4 Women will experience greater adverse impacts due to a lack of funding to take forward new welfare mitigations.</p>	<p>The Department’s bid for funding to support New Welfare Mitigations was not met in 2023-24. In the absence of funding, the Department is unable to progress this work.</p> <p>Within the Department’s 2023-24 Budget settlement, mitigation of any adverse impact on Section 75 groups, included children, will be considered in determining final budget allocations.</p>

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		17.5 The Budget allocation appears to effectively rule out implementation in the current financial year of any of the additional mitigations recommended by the independent review. This means that opportunities will be lost to improve the financial circumstances of people in various section 75 protected groups	
<b>18</b>	<b>NDNA programmes / Executive priorities</b>	18.1 Cuts to Executive/NDNA commitments will disproportionately impact on disabled people due to increased risk of poverty and continued absence of disability strategy	The Department bid for funding in 2023-24 to implement the Executive's New Decade New Deal (NDNA) commitments. The Department received no funding for implementation of NDNA commitments, in the absence of funding and pressures facing the Department in 2023-24, progressing this work is not affordable and will be a matter for an incoming Executive.