

# Written evidence submitted by Women's Platform [RCW0011]

## 1. Introduction

Women's Platform welcomes the opportunity to contribute evidence to this Inquiry. The rising cost of living is a significant issue and has a disproportionate impact on women, who act as shock absorbers of poverty and reduced spending power within families and communities. This is likely to have long term impacts both on individual women and families, and more widely on the economy and democracy. Addressing the crisis is possible, and significant changes are possible through measures that focus on how public sector actions impact on women and girls.

Women's Platform is a membership organisation working to promote the implementation of international human rights standards in Northern Ireland, and in particular the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), in line with commitments the UK has made to international human rights treaties. Established in 1988 as the Northern Ireland link to the European Women's Lobby, Women's Platform also represents women and girls in Northern Ireland at the European and international level, including at the UN. Women's Platform is in special consultative status with the Economic and Social Council of the UN.

The work of Women's Platform locally focuses on building the capacity of members and the wider women's sector to utilise international human rights standards and mechanisms for women's rights in their own practice and work to promote gender equality in Northern Ireland. Women's Platform also shares evidence and good practice from international networks locally, and works with members to amplify the voice of women and girls in Northern Ireland internationally. In addition, Women's Platform contributes evidence to consultation processes and engages with policy and decision makers to highlight human rights commitments and evidence of good practice on realising gender equality.

Women's Platform respects and celebrates the right of everyone to define their own identity and applies this to all our work. The comments below are made in light of this.

### 1.1 Endorsement

Women's Platform endorses the submissions by Women's Regional Consortium and Northern Ireland Women's Budget Group to this consultation, and would refer to the Women's Regional Consortium submission for a detailed overview of the impact of the cost of living crisis on low income women in Northern Ireland.

## 2. Summary

This submission sets out an overview of the impact of the cost of living crisis on women in Northern Ireland, and highlights recent research highlighting long term disadvantage exacerbated by austerity, now further deepened by the cost of living increases, which have led to financial stress for over 90% of low income women, with increasing levels of debt and borrowing to cover essentials. The submission expresses concern over long term impacts on women's life opportunities, as well as a potential deepening of the democratic deficit due to lack of capacity and opportunities to participate in public life. This is set out against the challenging situation in Northern Ireland, where tensions are high due to the political

deadlock, as well as increasingly stretched public services and a budget that is further reducing public services.

The submission highlights how the current situation in Northern Ireland has deepened the cost of living crisis, and underlines gender budgeting and a focus on gender in decision making as key solutions to the crisis. It also underlines information and individual tailored solutions as key supports businesses can put in place for women. The overall context of the submission is upholding human rights, within the context of UK obligations in international law and in particular as State Party to CEDAW.

### **3. Obligations of the UK in international law**

#### **3.1 Building on international guidelines**

The international law framework, including the International Covenant on Economic, Social and Cultural Rights, CEDAW, the Convention on the Rights of the Child (UNCRC), the Convention on the Elimination of All Forms of Racial Discrimination (CERD) and the Convention on the Rights of People with Disabilities (CRPD), and to some extent the Istanbul Convention, provides a clear mandate for effective strategies to be put in place to protect people with protected characteristics from poverty and social exclusion. Specifically, this framework introduces an obligation on States Parties to these conventions to put in place legislative measures, policies and programmes that ensure all population groups have equitable access to social protection, equal pay for equal work and remedies to ensure they are protected from destitution. In spring 2023, the Committee on the Rights of the Child expressed concern over the “large number of children living in poverty, food insecurity and homelessness”, and in addition to an action plan on child poverty with clear targets and indicators, urged for action on the root causes of poverty and a child rights based approach to all actions aimed at addressing poverty.<sup>1</sup>

The International Covenant on Economic, Social and Cultural Rights (ICESCR) sets out a clear requirement for men and women to have equal access to all of the economic, social and cultural rights set out in the Covenant (Article 3). ICESCR also sets out core conditions for decent living and working conditions (Article 7) and the right of all to an adequate standard of living, with States Parties required to take action in particular to prevent hunger (Article 11), while Article 10 sets out specific protections for women and children, including ensuring protection of maternity and access to adequate social protection for mothers, as well as protection from harmful working conditions for young people<sup>2</sup>. In 2020, the UN Special Rapporteur on extreme poverty and human rights highlighted the disproportionate impact of welfare system changes on women, in particular the conditionality, cap and two child limit introduced in Universal Credit<sup>3</sup>, which continue to affect women across the UK.

CEDAW also sets out the right of women to adequate social protection, and sets out guidance addressing the needs of specific groups. For example CEDAW General Recommendation 34 on the rights of rural women<sup>4</sup> specifically highlights that rural women are at greater risk of poverty than other population groups, due to issues including lack of access to jobs, education and services, and sets out directions for action for States Parties to address and prevent inequalities for rural women. General Recommendation on Article 16 highlights that women typically are economically disadvantaged to men, and recommends

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<sup>1</sup> Committee on the Rights of the Child (June 2023) [Concluding observations on the combined sixth and seventh periodic reports of the United Kingdom of Great Britain and Northern Ireland](#)

<sup>2</sup> [International Covenant on Economic, Social and Cultural Rights](#) 1976

<sup>3</sup> UN Special Rapporteur on extreme poverty and human rights (2020) [Visit to the United Kingdom of Great Britain and Northern Ireland: Report of the Special Rapporteur on extreme poverty and human rights](#)

<sup>4</sup> CEDAW Committee (2016) [General Recommendation 34 on the rights of rural women](#)

action to ensure that women can manage their finances independently, rather than women's income being viewed as household income for joint management.<sup>5</sup> Meanwhile, General Recommendation 27 on older women underlines that official data on different population groups needs to be collected and monitored to ensure States Parties can take effective action where needed.<sup>6</sup>

General Recommendation 35 also sets out guidance for States Parties on protecting women and girls from gender based violence. The Recommendation clarifies the CEDAW provisions and states that laws prohibiting gender based violence should include affordable and accessible services for victims.<sup>7</sup> It further notes that 'all legal procedures in cases involving allegations of gender-based violence against women are impartial, fair and unaffected by gender stereotypes or the discriminatory interpretation of legal provisions, including international law', and that procedures should not place an undue financial burden on women<sup>8</sup>.

### **3.2 Building on CEDAW**

Women's Platform would urge for CEDAW to be recognised as an international obligation of the UK<sup>9</sup> that provides the framework for effective action on gender equality; ideally, CEDAW should be incorporated in domestic law, as recommendations from several Concluding Observations state. At a minimum, CEDAW recommendations should inform policy and decision making, to ensure the UK remains in line with international law and good practice on gender equality.

In short, CEDAW requires States Parties to implement a rights based agenda that ensures legislation, policies and programmes are non discriminatory and focus on progressive realisation of equal rights for all. The Concluding Observations provide a roadmap for progressing gender equality, and the most recent set of recommendations emphasises access to justice and support for victims and survivors, as well as increasing action on prevention and culture change. Importantly, this covers action on ensuring equal access to support and protection for low income and minoritised women, who are at the greatest risk of long term poverty and associated harms.

Women's Platform believes that recognising CEDAW would also create effective links across Departments and strategies, which helpfully can act as a mechanism for creating a coherent framework for addressing gender equality. This, in turn, is vital, as the critical message of this response is that the disproportionate impact of cost of living increases on women is a result and expression of gender inequality and patriarchal norms, and cannot be sustainably addressed without action on gender equality in its widest sense.

## **4. The impact of the cost of living crisis on women**

The macroeconomic impact of the cost of living crisis has been clearly outlined by Women's Budget Group<sup>10</sup>, which emphasises that women act as the shock absorbers of poverty in

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<sup>5</sup> CEDAW Committee (2013) [General recommendation on article 16 of the Convention on the Elimination of All Forms of Discrimination against Women \(Economic consequences of marriage, family relations and their dissolution\)](#)

<sup>6</sup> CEDAW Committee (2010) [General recommendation No. 27 on older women and protection of their human rights](#)

<sup>7</sup> Ibidem, p. 10.

<sup>8</sup> Ibidem, p.15.

<sup>9</sup> [Convention on the Elimination of All Forms of Discrimination against Women](#) (CEDAW, 1979), articles 1 and 2. The UK signed the Convention in 1981 and ratified in 1986.

<sup>10</sup> Women's Budget Group (August 2023). [A feminist approach to macroeconomics](#)

society, and are therefore directly impacted by increasing costs of living. This is to a significant extent due to women's disproportionate unpaid work as carers, which is not recognised in macroeconomic policy and is typically undervalued, if not directly unvalued, in society. This, in turn, is associated with most gender inequalities, including women's lower levels of participation in paid work, the gender pay gap, and access to education and services. These inequalities also have macroeconomic impacts in themselves, reducing the available pool of skills and talent, a lower tax base, and increased costs, as women with caring responsibilities are unable to work in a labour market built around a male breadwinner model, and therefore have no option but to resort to benefits. Addressing this requires a new macroeconomic model, focused on a care and wellbeing economy, which in practice emphasises social infrastructure, supporting people and families to make autonomous choices. Such a framework would include unpaid care and domestic work alongside market activities, and would lead to better policies and outcomes for everyone, reducing the pressure on public services and promoting gender equality and well-being in a sustainable way.

In Northern Ireland, tensions arising from issues ranging from post Brexit arrangements and constitutional questions to lack of healthcare remain high. Uncertainty has been heightened by the lack of functioning institutions, which is increasingly creating anger at community level, due to the growing financial crisis in Northern Ireland and lack of sustainable, accessible services in particular in relation to healthcare<sup>11 12</sup>. The cost of living crisis is at the forefront of local people's minds<sup>13</sup>, and the current forecast indicates that up to a third of households in Northern Ireland face destitution between now and 2024<sup>14</sup>. The support provided by authorities is limited<sup>15</sup>, which is significant in a context where low income women in particular were struggling to feed themselves and their families even before the sharp inflation and cost increases<sup>16</sup>.

In comparison with other parts of the UK, Northern Ireland has the third lowest household incomes across UK regions, and almost a sixth (13%) of jobs are classified as low paid in the Annual Survey of Hours and Earnings, which is the third the highest across the UK. Real weekly wages in Northern Ireland fell 4.5% in 2021, the latest year for which records currently are available, while the reduction for the UK as a whole was 2.6%<sup>17</sup>. Meanwhile, the cost of living is higher due to factors including additional transport needs both for people and goods, and smaller markets. While housing costs in Northern Ireland are lower in absolute terms than elsewhere in the UK<sup>18</sup> (£82 per week for social rented accommodation compared to £93 in Great Britain and £105 per week for privately rented accommodation, compared £150 for Great Britain), this must be assessed against the lower incomes. Official statistics indicate that the lower end of rents in Northern Ireland amounted to more than 33% of the lowest household incomes in 2022, which was higher than in England (32%) or Wales (29%).<sup>19</sup>

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<sup>11</sup> See eg. *The Guardian* 19 November 2022 '[Northern Irish healthcare in crisis amid political deadlock](#)'

<sup>12</sup> BBC Northern Ireland 23 March 2023 '[NI Health: 'More people than ever paying for private healthcare](#)'

<sup>13</sup> See eg. *News Letter* 10 February 2023 '[Northern Ireland being hit harder by cost-of-living crisis than other parts of the UK as more forced to cut back on essentials, Which? research shows](#)'

<sup>14</sup> National Institute UK Economic Outlook, [No. 9](#), Vol. Series A, winter 2023

<sup>15</sup> See [Open letter on the cost of living crisis in Northern Ireland, 21 September 2022](#)

<sup>16</sup> Women's Regional Consortium (September 2022) [Women living with debt](#)

<sup>17</sup> Northern Ireland Statistics and Research Agency (October 2022) [Employee earnings in Northern Ireland](#)

<sup>18</sup> Office for National Statistics (March 2023) [Family Resource Survey data 2021-22](#)

<sup>19</sup> Office for National Statistics (October 2023) [Private rental affordability, England, Wales and Northern Ireland: 2022](#)

The impact of austerity and more recently the cost of living crisis on women in Northern Ireland has been researched in detail by the Women's Regional Consortium. This research demonstrates that women in disadvantaged areas of Northern Ireland have been facing difficult financial and living conditions for a long time. Prior to the Covid-19 pandemic, findings show that women were hardest hit by austerity, and many women even then had to choose to forego essentials or even food to provide for their families<sup>20</sup>. Universal Credit has done little to support or protect women; the difficulties with the five week wait for first payment are particularly significant and include families resorting to food banks, and frequently women going without basic necessities and limiting their food intake to ensure children and families are provided for. The strict work conditionality and tapering of Universal Credit are also creating challenges for women, who often have caring responsibilities, which limit availability for work. Health issues may also affect this.<sup>21</sup>

Consortium research on access to lending from 2020 shows that women on low incomes often have limited access to regular credit and rely on high cost forms of lending, sometimes for everyday living, which is associated with debt. At that time, lone parent families were overrepresented among those in debt advice<sup>22</sup>; follow up research from 2022 highlights that half of women interviewed were in debt and facing impacts including physical and mental health issues due to the ongoing stress. The 2022 report also highlights that high cost lending is increasingly commonly used, and adds pressure on women who are facing difficulties in meeting repayments<sup>23</sup>. The latest research from June 2023<sup>24</sup> shows that this is now the everyday reality for an increasing group of women, including women in work, with over 90% of respondents to this survey reporting struggling to pay for essentials, while there is also a wider economic impact as women no longer can afford basic services such as haircuts or café visits.

The research by Women's Regional Consortium also highlights the impact of the cost of living crisis on caring responsibilities. The latest research from June 2023 shows that women typically reduce expenditure on themselves and even go without necessities to ensure their children and families are provided for, but in the most difficult circumstances, some women face difficulties feeding babies and children adequately<sup>25</sup>. While no official figures are available, anecdotal evidence also underlines that the loss of the holiday food grant at the end of March has caused additional challenges for low income families<sup>26</sup>. Northern Ireland is the only devolved administration in Northern Ireland without such a grant, following closure of the fund established during the Covid-19 pandemic in March 2023, due to budget pressures and lack of functioning institutions in Northern Ireland<sup>27</sup>.

Finally, the cost of childcare and adult social care has for some considerable time affected the opportunities of women to make genuinely independent choices about participating in the labour market and in public life. Northern Ireland lacks a childcare strategy, and lack of access to affordable childcare was highlighted as an urgent priority by the CEDAW Committee in the 2019 Concluding Observations.<sup>28</sup> Data from the Childcare survey for Northern Ireland 2023, undertaken by Employers for Childcare, is not yet available, but data from the 2022 survey indicates that women are increasingly forced to leave the labour market, as the cost of childcare had risen by as much as 20% by autumn 2022, due to the rising cost of living<sup>29</sup>. Similarly, access to adult social care in Northern Ireland is complex and

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<sup>20</sup> Women's Regional Consortium (March 2019) [Impact of Ongoing Austerity: Women's Perspective](#)

<sup>21</sup> Women's Regional Consortium (September 2020) [The Impact of Universal Credit on Women](#)

<sup>22</sup> Women's Regional Consortium (February 2020) [Making Ends Meet – Women's Access to Lending](#)

<sup>23</sup> Women's Regional Consortium (September 2022) [Women living with debt](#)

<sup>24</sup> Women's Regional Consortium (June 2023) [Women and the impact of the cost of living crisis](#)

<sup>25</sup> Women's Regional Consortium (June 2023) [Women and the impact of the cost of living crisis](#)

<sup>26</sup> BBC news 4 August 2023 '[Holiday hunger: Families face challenges after food grants axed](#)'

<sup>27</sup> BBC news 30 March 2023 '[Free school meals: NI 'holiday hunger' payments axed](#)'; no official public statement was issued by the Department of Education

<sup>28</sup> CEDAW Committee (March 2019) [Concluding Observations on the 8th periodic report of the UK](#)

often involves costs for the individual or family<sup>30</sup>, which means that in many cases, financial issues force women to take on care for family members or relatives in an unpaid role.

## **5. What long-term effects will the rise in the cost-of-living have on equalities for women?**

The long term impacts are clearly set out by Women's Budget Group, which underlines that the impact of current monetary policy is increased caring responsibilities for women, which reduces women's ability to participate in the labour market, with direct impacts on women's ability to make autonomous economic decisions and participate in public life. This also has macroeconomic impacts, including a smaller talent pool, a lower tax base and skills shortages, as well as increased demand on public services<sup>31</sup>.

The research by Women's Regional Consortium highlights a very concerning picture of chronic poverty, with health impacts in particular for women, but also for families. Women highlight mental health issues and stress as specific impacts of the cost of living crisis, which in the context of stretched health care services and public budgets is a major issue, as access to support services is increasingly limited. Waiting times for mental health services were more than nine weeks for many patients in December 2022<sup>32</sup>, before the Budget 2023-24 announcement in April 2023, which involved a de facto cut to healthcare budgets<sup>33</sup>. This means that women are more likely to develop more significant mental health issues while waiting, with impacts on long term health and wellbeing.

Health impacts are closely linked to equalities for women, as poor health, alongside caring responsibilities, is a main reason why women fall outside the labour market. In Northern Ireland, a third of working age women are outside paid work; more than a third of this group (37%) is out of paid work due to long term illness, while a quarter report caring responsibilities as the reason. The latter figure has risen steadily over the last two years, which is notable in the context of the rising cost of living.<sup>34</sup>

Lack of opportunities for paid employment, meanwhile increases and perpetuates poverty, which is higher for women than men: most recent data for Northern Ireland show that 44% of single, workless women and eight per cent of single women in work were considered to be living in poverty in 2022 after housing costs, compared to 29% of single, workless men and a proportion suppressed due to low numbers for single men in work. This also increases the risk of poverty in later years, as income during working age directly affects the level of pension – State Pension or private – that an individual can access to support themselves. Older women are overall more likely to live on low incomes than older men; most recent data available for Northern Ireland show that 24% of pension age women were identified as living in poverty before housing costs, compared to 18% of men; after housing costs, this figure was 18% for women and 14% for men.<sup>35</sup>

It is important to note that lack of autonomy in decisions regarding whether to engage in paid work is in itself associated with an increased risk of ill health. In other words, the cost of

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<sup>29</sup> Employers for Childcare (November 2022) [Northern Ireland Childcare Survey 2022](#)

<sup>30</sup> Department of Health (January 2022) [Consultation on The Reform Of Adult Social Care](#)

<sup>31</sup> Women's Budget Group (August 2023). [A feminist approach to macroeconomics](#)

<sup>32</sup> BBC news 15 February 2023 ['Mental health services 'struggling' as waiting lists grow'](#)

<sup>33</sup> Department of Health press release 3 May 2023 ['DoH provides budget briefing'](#)

<sup>34</sup> Northern Ireland Statistics and Research Agency (October 2023) [Labour Market Report – October 2023](#)

<sup>35</sup> Department for Communities (March 2023) [Northern Ireland Poverty and Income Inequality report 2021-22](#)

living crisis is likely to perpetuate poverty for many low income women, mediated through ill health and increasing additional home responsibilities. There is also an impact on girls and young women, particularly young women from low income backgrounds, as family poverty is closely associated with child poverty, which in turn is a key risk factor for lower engagement with education and lower educational attainment<sup>36</sup>. As such, the cost of living crisis is likely to increase the risk of long term poverty for already marginalised girls and young women, thus perpetuating cycles of poverty and disadvantage, which in some parts of Northern Ireland have become endemic and intergenerational.

The increase in levels of debt highlighted by the Women's Regional Consortium research also has an impact on women's equalities. Debt is a major source of financial stress, driving the cycle of ill health and poverty discussed above. In addition, indebtedness narrows the autonomy of decision making available, as the demands of debtors dictate individuals' decisions. From a women's perspective, this means compounding the lack of autonomy associated with low income and caring responsibilities, and as highlighted in the Women's Regional Consortium research, leads to many women's lives focusing on meeting core family needs and debt payments. Illegal lending, which in Northern Ireland includes links to paramilitaries formerly involved in the regional conflict, continues to have a foothold in many communities<sup>37</sup>, which highlights the complex interactions of violence against women and poverty, and underlines the importance of action to protect women and girls not only from destitution, but also violence and exploitation. Meanwhile, poverty and debt are key barriers for women to leave abusive relationships, and there is evidence that the cost of living crisis is trapping women in abuse, as they are unable to afford rents and other costs of living independently. The situation is particularly severe for women without recourse to public funds, who are at major risk of abuse as well as exploitation due to their vulnerable financial and in some cases legal position<sup>38</sup>.

Finally, the overarching issue implied in all of the discussion above is women's equal participation, representation and voice in society. Poverty and financial stress limit all of these issues, and therefore deepen the democratic deficit; women in Northern Ireland in general report feeling unheard and unrepresented in public decision making<sup>39</sup>, and this is particularly marked in more disadvantaged areas, where many women feel disillusioned with institutions and have limited interest in public life and public affairs. At the same time, it is increasingly difficult for communities to disentangle issues, as the cost of living continues while political crises deepen, locally as well as globally. This is creating a situation where disinformation can emerge, and it is a major concern that this is happening, with a view to creating distrust both within and between communities, and between communities and decision makers. This, in turn, could easily deepen into disengagement with the institutions and political processes, and anecdotally, this is already happening. Action is vital to ensure that the cost of living crisis is managed, in order to maintain stability and avoid deepening uncertainty and insecurity across wider societal issues.

## **6. How effectively is the Government's cost of living response helping women to meet the costs of essentials?**

The research by Women's Regional Consortium underlines that the statutory sector response to the cost of living crisis is not working and leaves women struggling to meet essentials. Findings published in June show that 75% of respondents said they were having

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<sup>36</sup> See eg. Marmot, M et al (2020) [Health Equity in England: The Marmot Review 10 Years On](#) for a detailed overview of how poverty and disadvantage shape health and wider life outcomes

<sup>37</sup> Women's Regional Consortium (September 2022) [Women living with debt](#)

<sup>38</sup> See eg. Women's Aid (August 2022) [The cost of living is preventing women from fleeing domestic abuse](#)

<sup>39</sup> See eg Women's Platform (2023) [A Women's Vision for Northern Ireland](#)

the most difficulty paying for their food shopping, 73% said electricity, 52% gas, 38% travel costs, 34% internet bills, 30% home heating oil and 27% school costs. Over half (56%) of participants were in debt and 82% of these women said they had had to borrow because of cost of living increases.<sup>40</sup>

The one off payments to subsidise energy and household bills in winter 2023 were welcomed in Northern Ireland; however, research on the impact of the first installment of the means tested cost of living payment has found that the one off nature of payments creates challenges in particular for low income households, as they allow for short term higher spending, but do not assist with ongoing budgeting. The study by the Institute for Fiscal Studies also indicates that as the scheme does not consider specific needs of households, targeting it appropriately is difficult<sup>41</sup>. The second and third means tested cost of living payments for those on specific 'passport' benefits are currently being rolled out<sup>42</sup>, and it would be important to follow up the impact of these to inform future policy and decision making.

In Northern Ireland, the budget 2023-24 has created significant challenges both for organisations and individual households. The budget is flat in cash terms, and also withholds any Barnett consequential to pay for an overspend in the 2022-23 budget<sup>43</sup>, which in practice means deep cuts across Northern Ireland Departments in 2023-24, and likely beyond. This has led to cuts to key programmes supporting families, including completely axing the holiday food grant<sup>44</sup> and deep cuts to Discretionary Support Grant for those on the lowest incomes<sup>45</sup>, with cuts to special educational needs budgets and other school provisions, such as counselling (the Healthy Happy Minds programme)<sup>46</sup>. Proposals for savings put forward by Departments include axing the community transport service supporting rural populations to access healthcare and other services, as well as turning off street lights<sup>47</sup> and removing free travel for 60-64 year olds<sup>48</sup>. The Department of Health cut its core grant scheme<sup>49</sup>, affecting 62 organisations including Women's Aid Federation Northern Ireland, which lost over £147,000<sup>50</sup>, and Disability Action, which lost its entire information and advice service<sup>51</sup>.

Cuts have been made with very limited discussion, and although equality impact assessments were published by most Departments, these were inconsistent in approach, and typically utilised very limited information, as highlighted by the Equality Commission for Northern Ireland<sup>52</sup> in an overview of limitations within the process. There is an urgent need to review financing of public services in Northern Ireland, as well as strengthening commitment and capacity to assess proposals comprehensively for their impact on key population

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<sup>40</sup> Women's Regional Consortium (June 2023) [Women and the impact of the cost of living crisis](#)

<sup>41</sup> Institute of Fiscal Studies (July 2023) [Poverty](#)

<sup>42</sup> BBC news 29 October 2023 ['Cost of living: Second round of low-income grants to be paid'](#)

<sup>43</sup> Northern Ireland Office (April 2023) [NI Finances 2023-24](#)

<sup>44</sup> BBC news 30 March 2023 ['Free school meals: NI 'holiday hunger' payments axed;](#)

<sup>45</sup> Department for Communities (July 2023) [Consultation on changes to the Discretionary Support Scheme](#)

<sup>46</sup> Department of Education press release 1 June 2023 ['Department of Education protects funding for vulnerable children and young people'](#)

<sup>47</sup> Department for Infrastructure (May 2023) [DfI Resource Budget 2023-24 Equality Impact Assessment Consultation](#)

<sup>48</sup> Department for Infrastructure (June 2023) [Consultation on changes to the Concessionary Fares Scheme](#)

<sup>49</sup> Department of Health press release 3 May 2023 ['DoH provides budget briefing'](#)

<sup>50</sup> See eg. View Digital 8 August 2023 ['Funding cut to Women's Aid Federation is 'absolutely indefensible' says SDLP MP Claire Hanna'](#)

<sup>51</sup> Disability Action website article (September 2023) [Political Crisis Ends Essential Services and Representation of Disabled People](#)

<sup>52</sup> Equality Commission for Northern Ireland (September 2023). [Briefing Note: Concerns regarding cumulative equality impacts of proposed Departmental Budget allocations for 2023-24](#)



groups. The importance of this cannot be overemphasised, in the context of increasing demand for core services and the ongoing uncertainty relating to Northern Ireland institutions, and increasing community level distrust in institutions outlined above.

The IFS report concludes that uprating benefits would be a more targeted, more cost effective way to support those in greatest need and most affected by the cost of living crisis. It highlights that the £20 uplift to Universal Credit during the Covid-19 pandemic contributed to supporting the most vulnerable households in a way that prevented steep increases to poverty, and notes that this demonstrates the effectiveness of targeted interventions<sup>53</sup>. The need for long term solutions is also highlighted in the research by the Women's Regional Consortium, which emphasises that women from low income backgrounds in Northern Ireland have experienced a cost of living crisis for a long period, and are increasingly unable to make any more savings without risking the health and wellbeing of themselves as well as their families.

## **7. What could the Government Equalities Office do to ensure the Government's cost-of-living measures respond to any inequalities women face?**

The Government Equalities Office (GEO) does not have a remit for Northern Ireland or the other devolved administrations; however, Women's Platform understands that GEO is in communication with Departments and units responsible for gender equality in devolved administrations, and this is an important role that can facilitate effective sharing of information and good practice. It would be very helpful to ensure a clear framework to this engagement, for example in the form of a regularly meeting network. An added benefit of such a mechanism would be more effective communication in preparation for UN human rights reporting, which at present does not always identify key stakeholders and therefore does not have access to the latest and most comprehensive information on a UK wide basis.

More generally, the GEO, as well as equivalent or similar units in devolved administrations in Northern Ireland, Scotland and Wales, can play a key role in ensuring that government led policies and programmes are assessed for their impact on women, as well as other groups with protected characteristics, such as children and young people, older people, minoritised groups and LGBTQ+ groups. Specifically, this can and should include ensuring that equality impact assessments are undertaken where appropriate; experience from Northern Ireland indicates that capacity and understanding varies significantly between Departments<sup>54</sup>, and therefore support is needed to ensure this tool can be used effectively to identify potential harms and relevant mitigations.

Gender budgeting offers an additional tool for doing this kind of comprehensive analysis, as this approach at its core is about ensuring effective resource allocation across the budget. Gender budgeting focuses on following investments and identifying impacts on a diverse range of population groups, enabling a range of impacts to emerge and inform effective decision making. **Please note the appendix included to this submission, which is a statement on gender budgeting prepared by Northern Ireland Women's Budget Group and Ulster University.** Women's Platform endorses this statement, and believes that GEO and its equivalents can take on a key role in ensuring effective resource use, through piloting gender budgeting and supporting introduction of the tool as part of regular policy screening.

Finally, GEO can contribute to effective, gender responsive decision making by supporting capacity building on gender equality, and cross Departmental working on issues such as

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<sup>53</sup> Institute of Fiscal Studies (July 2023) [Poverty](#)

<sup>54</sup> Equality Commission for Northern Ireland (September 2023). [Briefing Note: Concerns regarding cumulative equality impacts of proposed Departmental Budget allocations for 2023-24](#)

gender budgeting. The specific expertise that can be developed within GEO in this kind of role across Departments can significantly support a consistent approach to gender equality across Whitehall, and therefore promote cross Governmental policy coherence. In this role, GEO could assist in developing an evidence base to support decision making, identifying and signposting officials to key sources of good practice, and contribute to developing networks of officials with an understanding of gender sensitive and responsive policy making. In a very comprehensive approach, this role would extend to identifying potential issues or gaps in Government proposals, to ensure women and gender equality is increasingly mainstreamed and existing rights and protections are upheld in line with the international obligations of the UK. In light of its role in coordinating the UK response to international human rights processes, GEO is uniquely equipped to ensure adherence to rights frameworks, in a way that will contribute to addressing poverty and inequality within the UK as well as strengthening the role of the UK as a global leader in this field.

## **8. What could businesses do to help women cope with increases to the cost of living and manage debt?**

Women's Platform specifically endorses the Women's Regional Consortium response to this question, as this submission is based on concrete evidence from women with lived experience of poverty and debt.

Across sectors, a key issue for women is access to information and support. As highlighted in the research by Women's Regional Consortium, women find it difficult to access information about available support, and frequently find it difficult to get in touch with relevant service providers to seek help and discuss their specific situation. Stigma and concern about future negative impacts on accessing services also increase barriers to seeking help. Therefore, it would be important for service providers to clearly provide information on their approach to hardship and difficulties in making payments; where this exists, it is vital to ensure it is easily accessible from mobile browsers, as many women in the most difficult circumstances do not have access to a laptop or desk computer. Relevant phone numbers are also vital, as online chat systems are often ill equipped to deal with individual cases.

There is also an onus on local and central government to improve information sharing on available support funds and systems. In Northern Ireland, local government offers a number of hardship grants and support funds; however, information on these is not clearly made available on Council websites, and also not regularly shared with voluntary and community sector organisations working with women and girls. As noted above, the Department for Communities is preparing major cuts to Discretionary Support Grant funding<sup>55</sup>, but clear information is not as yet available to potential applicants. This increases the risk of confusion and those in need of support finding out through hearsay, which reduces trust in public institutions and increases stress, with associated health and social impacts.

### **8.1 Banking and financial sector**

The Bank of England can play a major role in addressing the impact of cost of living increases on women, in particular through monetary policy. The interest rate rises in the last 18 months have been a significant driver of the cost increases, and as indicated in the call for evidence for this Inquiry, have disproportionately affected women. The Women's Budget Group has undertaken a major analysis of the impact of monetary policy on gender, and emphasise that interest rate rises impact women differently than men, for example by increasing costs for women more than men, as men tend to have more assets, and spend

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<sup>55</sup> Department for Communities (July 2023) [Consultation on changes to the Discretionary Support Scheme](#)

less of their income on necessities. Women's Budget Group urges the Bank of England to take a gender sensitive approach to monetary policy, including undertaking gender impact assessments of proposed decisions, increasing the proportion of women within Bank governance structures, and building capacity on gender within the Bank.

The Group also urge for closer coordination of fiscal and monetary policy, noting that the current levels of inflation are not a result of increasing wages and demand, but rather have been created by supply shortages internationally, as well as increased profits for big companies<sup>56</sup>. This means that a key action should be controlling inflation through fiscal means, while ensuring that the cost of basic good remains affordable, as the impact of uncontrolled price rises have significant costs for society, through destitution, ill health and increased public unease and unrest.

The banking and financial sector can play a significant role in helping identify and support victims of domestic and financial abuse. In particular, the sector can assist in securing evidence of abuse, such as regular transfers or payments to other accounts, and in this way contributing to prosecuting perpetrators. Specific mechanisms could also be set up for victims of abuse, where their specific circumstances can be reviewed and eg. individual, tailored overdraft repayment schemes set up. Vitally, flexible and tailored approaches could be developed for those with high levels of debt, to prevent escalation of the situation and reduce the risk of those affected resorting to doorstep or illegal lenders. This could reflect currently available systems for dealing with personal bankruptcies, but be offered proactively and sensitively to protect women and families from destitution, which is not only a major risk for individuals, but a significant cost to society due to the increased ill health and risk for exploitation and engagement in dangerous or criminal activities this entails.

While it is understood strict criteria must be applied to issuing credit, the banking and financial sector could also explore options for extending access to affordable credit to those on lower incomes. Potential mechanisms could include pre payment plans, which currently are offered by some providers, but typically at very high overall cost, and longer repayment periods, potentially with fixed monthly repayments to offer predictability. Collaboration across the sector could also be improved to avoid problem debt, such as individuals taking out multiple credit cards or payday loans, which could be for example flagged through credit scoring agencies, ideally with mechanisms to offer support to anyone flagged in this way.

## **8.2 Energy and utility companies**

Energy and utility companies can support vulnerable households by offering clear information on how to contact them to discuss payment difficulties. It would be very helpful for companies to develop support schemes, such as longer repayment periods and systems where a minimum payment ensures supply is maintained, and removes the fear of disconnection. This would be particularly important for households with disabled, sick and older members, as such households typically have higher energy costs due to a need for constant heating and/or medical equipment, and would be in line with the equality duties of the statutory sector.

Women's Platform supports proposals to develop a social tariff<sup>57</sup> for those on the lowest incomes, to ensure equitable access to affordable energy. This could helpfully be explored through existing prepayment meter schemes, which are disproportionately used by lower income households and currently often involve higher unit prices than contracts based on

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<sup>56</sup> Aguila, N & Powell, J (September 2023) [Gender and monetary policy](#). London: Women's Budget Group.

<sup>57</sup> National Energy Action (July 2022) [Solving the Cost of Living Crisis: the case for a new social tariff in the energy market](#)

direct debit payments. This could be introduced as a pilot if required, supported by the windfall profits of energy companies over the last 18 months, and could significantly support households, while also reducing costs to the public purse through reduced ill health, resulting from warmer homes and lower financial distress.

The water sector in Northern Ireland is currently not privatised, and households in Northern Ireland pay for water and sewerage, as well as other infrastructure and waste management, through the regional and district rates.<sup>58</sup> However, the Secretary of State for Northern Ireland has instructed Permanent Secretaries in the Northern Ireland Civil Service to explore additional revenue raising options, and water charges are central among proposals<sup>59</sup>. Consultations on proposals are expected in the near future; however, it is not currently clear how any decisions are to be taken and implemented in the absence of sitting institutions. It is important to note that households on the lowest incomes are likely to face a disproportionate burden of any additional charges for public services, and it is therefore vital to include options for mitigation in any proposals to be put forward as a basis for new mechanisms.

### **8.3 Telecoms providers**

Like energy and utility companies, telecoms providers can significantly improve information sharing regarding how to discuss payments, as well as billing and tariffs available, to enable customers to choose the most affordable plans. It is also important that providers offer affordable pay as you go plans with a reasonable amount of data, as access to the Internet is now a requirement for accessing basic services, as well as engaging in daily life, and therefore may be considered a necessity. Many low income customers use pay as you go mobile plans as their main way to gain access to the Internet and manage responsibilities from engagement with children's schools and eg. benefit advisors, to paying bills and maintaining contact with family, and ration usage in line with their budget. However, any gaps in access can create concrete issues, including potential benefits sanctions from missed appointments and updates, and therefore telecoms providers can play a role in providing security for customers. For example, emergency credit such as that applied to pre paid energy meters could be utilised for an initial 24 hour period, which would reduce the risk of concrete harm to individuals.

It is important to note that the upgrade offers provided by many mobile phone service providers can encourage customers to buy a plan they cannot afford, in order to access the newest handsets. Specifically, young people may be attracted to these, and in particular low income mothers may feel pressurised to buy in, due to feelings of shame over their financial situation and wanting to enable their children to 'fit in'. This increases the risk of a cycle of debt, and needs to be considered in any guidance to providers regarding responsible advertising.

### **8.4 Supermarkets**

Food insecurity is a reality for many families in Northern Ireland, with women most affected both as the budget planners within families, and the shock absorbers who where necessary reduce their own food and necessity consumption. As noted above, the Women's Regional Consortium research shows that 75% of respondents found food bills the most difficult<sup>60</sup>, and also highlights how respondents skip meals to make budgets stretch.

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<sup>58</sup> NI Direct website, [A guide to rates](#), last accessed 31 October 2023

<sup>59</sup> Northern Ireland Office press release 20 September 2023 '[Secretary of State writes to Northern Ireland Civil Service on sustainable public finances](#)'

<sup>60</sup> Women's Regional Consortium (June 2023) [Women and the impact of the cost of living crisis](#)

Supermarkets can significantly support women affected by the cost of living by ensuring affordable, basic foods and necessities are available. This is particularly important during the Christmas period, and ensuring affordability of basic goods should be taken into account as part of seasonal offers. Approaches such as providing special offers to those eligible for the Healthy Start vouchers could also be explored as a targeted way of supporting those on the lowest incomes, and would also go some way towards reducing stigma around such schemes.

## Appendix 1

### Gender Budgeting Statement for Departmental EQIA's on the 2022-23 Budget Allocations

#### - Northern Ireland Women's Budget Group and Ulster University's [Gender Budgeting Project](#)

It is important to acknowledge that the current budget process is particularly abnormal, and we understand that the budget allocations delivered by the Secretary of State are not only highly restrictive but put undue pressure on officials to make decisions they should not have to make. The abnormality of this budget cycle also means that planning procedures that occur during a typical budget process have not taken place. Without the fulfilment of these procedures, the equality screening and impact assessment consultation comes too late in the process and is inadequate for full consideration of the impact of these spending decisions on women.

Gender Budgeting requires government departments to analyse the different impact of a budget on people of different genders, starting as early in the budget cycle as possible. The aim of gender budgeting is to ensure that the distribution of resources creates more gender equal outcomes. Over time, gender analysis should become embedded at all stages of the budget process. Women's intersecting identities are also included in this analysis and policy-makers are expected to promote these areas of equality as well. There is widespread political support for gender budgeting in Northern Ireland and a growing evidence base that it can help create a more equal society. In the current budget crisis women will experience particular disadvantages due to the pre-existing socio-economic conditions. For example, there is strong evidence that women have suffered disproportionately from over a decade of Westminster austerity measures, the pandemic, and the cost-of-living crisis<sup>61</sup>. We cannot afford to continue making decisions at the expense of women and risk further degradations to gender equality and additional intersecting equalities as well.

Not only is there an immediate need for gender budgeting in our current crisis, but the benefits would help to improve the budgetary process. Gender budgeting is good budgeting; it encourages greater transparency of government processes, more in-depth assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures will create a firewall to prevent such disproportionate disadvantages in future.

We recognise that the current equality screening and impact assessment duties under Section 75 provide policy infrastructure that could be used to progress gender budgeting. The EQIA process allows space to identify budget impacts on women and opportunities to promote more gender equal outcomes. However, too often the analysis included in these documents focuses only on equal treatment or stops at the point of acknowledging pre-existing inequalities. For gender budgeting to be fully implemented, the next stage must be to reformulate budgets and budgetary policy with targeted measures to improve outcomes for women and girls. Additionally, Section 75 screening and impact assessment typically takes place at the very end of the budget planning process or after the budget has been

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<sup>61</sup> MacDonald, E.M. (2018) [The gendered impact of austerity: Cuts are widening the poverty gap between women and men](#). British Politics and Policy at LSE  
Charlton, E. (2023) [This is Why Women are Bearing the Brunt of the Cost of Living Crisis According to Research](#). World Economic Forum.

finalised. The OECD<sup>62</sup> highlights that best practice for gender budgeting is to embed it at all levels of policy- and budget-making: planning, formulation, approval, implementation, monitoring and reformulation. It is crucial that gender equality obligations are not a 'tick-box exercise,' but rather that gender equality is mainstreamed in every area of the budgetary process through gender analysis of data supported by experts from civil society.

*November 2023*

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<sup>62</sup> OECD (2023), OECD Best Practices for Gender Budgeting, *OECD Journal on Budgeting*, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.