



Advice NI Consultation Response: on the Executive Office Budget Allocation 2023-2024 EQIA

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Consultation on the Executive Office Budget Allocation 2023-2024 EQIA

Advice NI Response

Q 1 Do you agree that TEO has gathered the necessary data to inform its decisions around the allocation of its budget?

Yes.

Q 2 Do you agree with TEO's assessment of the options for budget reductions?

Advice NI welcomes that tackling disadvantage and promoting equality of opportunity are core priorities for the Executive Office (TEO) and its arm's-length bodies. Specifically, support for minority ethnic people and groups, co-ordination of the Executive's responsibilities for refugees and asylum seekers; and in trauma-informed policy development and practical support for Ending Violence Against Women and Girls, and survivors of historical institutional abuse. Advice NI has a long history of operating projects which provide advice and support for several of these groups. This includes:

- HIA victims and survivors since the beginning of the Historical Independent Abuse Inquiry, in 2013, working with WAVE Trauma Centre and VSS [Victims & Survivors Service]¹.
- Roma clients, through Advice NI member Forward South Partnership, which is the parent organisation for the Roma Support Hub, that includes a Romanian-language Helpline which signposts and refers to specific organisations (i.e. Food Banks, Housing Rights etc.)².
- Refugees: In 2022, as part of Refugee Week, Advice NI ran an advice session covering UK government schemes available to Ukrainian nationals; both for Ukrainian nationals aiming to arrive to NI and for those already living in NI³.

TEO states that it aims to 'structure our budget to ensure protection of the most vulnerable'⁴. Further, 'the expectation is that ring-fenced funding (for Victims' Payments, HIA redress and services, Mother and Baby Homes, Communities in Transition, Homes for Ukraine, Peace+ and some smaller budget lines), will be adequate'⁵.

Advice NI feels this is a positive approach, and as such, funding allocations should continue as intact as possible, in order to achieve this aim.

Advice NI hopes that there will be a reduced adverse impact on many categories of persons listed in Section 75. It must also be remembered that in many cases individuals will tick more than one Section 75 box, for example an individual being not only a female refugee, but also of a minority religion, with dependents. She is not only vulnerable due to one life circumstance, but many.

¹ [Advice NI HIA](#)

² [Advice NI Forward South Partnership](#)

³ [Advice NI Refugee Week](#)

⁴ [TEO Assessment Spending Plans](#)

⁵ IBID

Q3 Do you agree with TEO's assessment of equality impacts of the options considered for budget reductions?

Advice NI acknowledges 'in allocating budgets the Department aims to avoid any adverse impacts'. However, the EQIA sets out a range of options that demonstrate clear adverse impact on particular groups and subgroups of Section 75, which gives Advice NI cause for concern: namely women, migrants and the disabled. It is possible for an individual to be a disabled, migrant woman, and therefore vulnerable in more than one area, through no fault of their own but unfortunate circumstance. Budget reductions in these areas could therefore have a devastating impact on such individuals who need to access services.

As highlighted throughout this consultation response, it is the driving aim of Advice NI to protect the interests and rights of the vulnerable.

Q 4 Do you agree that TEO has correctly identified all relevant mitigations that could help reduce the adverse equality impacts of the budget reductions?

The Executive Office may have identified possible mitigations that could help reduce the impacts of budget reductions, but these mitigations should not be considered a permanent fix, nor seen as an on-going solution.

The EQIA states: 'Point 22: A required reduction of some £9.5m (11.1%) against planned baseline requirements. This is an unprecedented reduction, and it is clear it will have significant implications for the outcomes delivered by this Department, if some of them are deliverable at all.'

Advice NI calls on The Executive Office to continue to ensure that the role and impact of the independent advice network is recognised and respected. Budget reductions will inevitably, and unavoidably, have adverse impacts on the ability of the sector to provide support services to the most vulnerable.

While TEO states that 'living within budget will mean making very difficult decisions'⁶, it is crucial that these decisions are not simple and sweeping slashing of funds to the advice sector, which will inevitably have a direct, negative impact on the most vulnerable, i.e. Advice service users. TEO must bear in mind, when considering budget cuts:

"At a grassroots level, members continue to provide essential advice services to local communities of need / particular social groups and it is essential that this provision be supported in an inclusive fashion. This provision must not be alienated or marginalised by prohibitive standards which reflect bureaucratic need rather than practical need."⁷

⁶ [TEO Equality Impact Assessment](#)

⁷ [Advice NI Briefing Paper DSD Strategy](#)

The EQAI also states: ‘Working with other organisations in the public, private, and voluntary sectors to identify alternative sources of support for groups impacted by the budget allocations.’⁸

Consulting with stakeholders and the 3rd sector could help somewhat ease the impact of budget cuts. However, ‘alternative sources of support’ does echo the government’s recent over-reliance on foodbanks, to mitigate the real-world impacts of, for example, inflation and the inadequate financial provisions from Universal Credit. [The public’s] reliance on food banks has increased 22-fold since the beginning of austerity policies in 2010, according to the Trussell Trust⁹.

The Briefing paper ‘The Psychological Impact of Austerity’¹⁰ directly links cuts to public services with mental health problems. It states: “Austerity policies have damaging psychological costs. Mental health problems are being created in the present, and further problems are being stored for the future.”¹¹

The reason that this is of such concern to Advice NI, is that Northern Ireland already has the highest prevalence of mental illness in the UK, with an incidence of around 16 deaths per 100 000 individuals per year. Psychiatric morbidity in Northern Ireland is 25% higher than in the UK¹².

As Northern Ireland is already struggling with more prevalent mental health issues than the rest of the UK, cuts to support services would only exacerbate this issue.

Q 5 Do you agree with TEO’s overall assessment of the business areas where budget reductions will need to be made?

No. One of the proposed actions by TEO may be a reduction in the Minority Ethnic Development Fund (p.26 of the EQIA). The Minority Ethnic Development Fund (MEDF) plays an important role in promoting good race relations in NI.

The review of Hate crime legislation in Northern Ireland¹³ carried out by Judge Marrinan in 2020 showed that whilst there was a one in 31 chance of becoming a victim of a reported racial hate incident, there was a one in 1,777 chance of becoming a victim of a reported sectarian hate incident.

With the exception of the period 2009/10 and 2011/12 hate crimes have remained in excess of 600 per year since records commenced in 2004/05. In this context it is disappointing to note that there will be cuts to a fund promoting good race relations.

⁸ TEO Equality Impact Assessment

⁹ [Impact of Austerity Briefing Paper](#)

¹⁰ IBID

¹¹ IBID

¹² [The Lancet](#)

¹³ [NI Hate Crime Review](#)

As noted in the EQIA, the MEDF is the only dedicated fund designated by the NI Executive to support good race relations. Furthermore, there has been a significant increase in the migrant and minority ethnic population identified in the Census NI 2021¹⁴, compared with the previous Censuses. The migrant and minority ethnic community is also more diverse than hitherto and there are likely to be more voluntary and community groups from these communities competing for a reduced funding pot.

An independent review of the MEDF undertaken by Business Consultancy Services for TEO in 2020 concluded that there is a clear demand from the funded organisations for the overall value of the Fund to be increased from its current level.

It was pointed out that to most of the funded organisations, MEDF was the single most important source of funding and was central to their sustainability and ability to meet the needs of the minority ethnic people that they served.

In addition, it was highlighted that the Fund had not kept pace with the growth of the increasingly diverse minority ethnic population in NI and the wide range of needs arising.

As an Office of Immigration Service Commissioner, EUSS advice provider in NI [2019 to present], Advice NI supports most complex cases of vulnerable EU nationals and their family members. This is in order to secure their immigration status via the EU Settlement Scheme. Unlike other Grant Funded Organisations in other devolved regions, we did not receive any additional funding from the TEO to ensure further reach of vulnerable groups, instead we worked with the TEO, and included our EUSS advice service details on a leaflet regarding Brexit, sent to every household in NI¹⁵. In addition, the TEO promoted the EUSS via other channels.

This raised awareness of many EU nationals living, working and studying in the NI and their family members. The EU Settlement Scheme will continue to be a route for many people in the future. Cuts to the MEDF would further limit the effectiveness of the Racial Equality Strategy 2015-2025¹⁶, which has been widely criticised by stakeholders - see: NI Affairs Committee (2022) 'The experiences of minority ethnic and migrant people in Northern Ireland' Report¹⁷

In our submission, Advice NI strongly urges the government to review policies that cause poverty, social and digital exclusion of minority ethnic and migrant families, enables access to language/digital support and independent advice including immigration advice to those who need it.

The Equality Commission has urged the Executive to allocate targeted resources to its racial equality strategy and to consider the potential of equality budgeting processes in assisting Government to ensure that equality and good relations aspects are appropriately resourced to deliver targeted and relevant outcomes. The Equality Commission recommended that

¹⁴ [Census NI 2021](#)

¹⁵ [Brexit & You leaflet](#)

¹⁶ [Racial Equality Strategy 2015-25](#)

¹⁷ [NI Minority & Migrant Experiences Report](#)

clear measurable priority areas should be determined by where the greatest inequality exists and/or the greatest impact can be made.

The Commission also recommend that TEO takes the lead in co-ordinating the collection of disaggregated data to monitor equality and social inclusion and the effectiveness of corrective actions under the Racial Equality Strategy (2014): Racial Equality Policy Priorities and Recommendations (p.43)]¹⁸.

The Equality Commission's guidance on Section 75 and budgeting¹⁹, Section 75 and budgets: A Short Guide, states that:

'True equality is not delivered by treating everyone exactly the same but by treating all fairly. Decision makers who have to work with greatly reduced budgets have tough choices to make and people are sure to be disadvantaged as a result. It is even more important, in that context, that **all possible steps are taken to protect the most vulnerable in our society and to ensure that the impact on them is a key consideration where cuts in services are being considered**' (Advice NI emphasis).

Section 75 does not prevent difficult decisions being taken, nor does it stop decisions which will affect one group more than another. It enables financial decisions which are informed by evidence of the impact they are likely to have, where mitigation and alternative policies have been considered, and which are transparent and accountable.'

The European Commission Against Racism and Intolerance²⁰ (a Council of Europe body) will undertake its sixth cycle review of the United Kingdom later this year and will have a particular focus on measures to promote inclusion and integration; and measures to combat hate speech and hate violence.

A further examination by the UN Committee on the Elimination of All Forms of Racial Discrimination²¹ of the UK's record on implementing the UN Convention on the Elimination of All Forms of Racial Discrimination is also imminent.

Q 6 Do you have any other comments you would like to add about this consultation?

Background: The independent advice network

Advice NI's vision²² is of a society of confident, informed, and active citizens who can access their rights and entitlements. Advice NI facilitates:

Generalist advice services: Generalist advice covers independent advice.

¹⁸ [Racial Equality Strategy 2014](#)

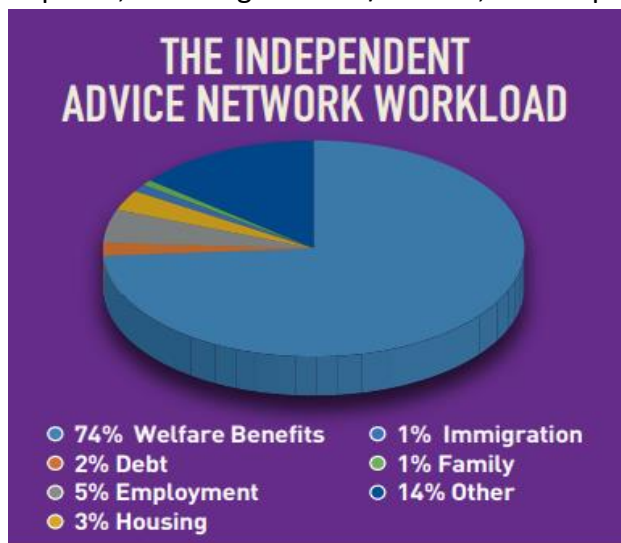
¹⁹ [Equality Commission Guidance: Section 75 & Budgets](#)

²⁰ [European Commission against Racism & Intolerance](#)

²¹ [UN Committee: Elimination of All Forms of Racial Discrimination](#)

²² [Our Vision | Advice NI](#)

Specialist advice providers/services: Specialist advice to a specific ‘target’ client group or on a particular subject. Services are bespoke and authoritative in application, e.g. Business Debt Advice. The latest statistical information is available in Advice NI’s latest Annual Report²³, including for 2021/22: 241, 088 enquiries.



The independent advice sector role during Crises

The independent advice network has tackled need most notably during Covid and the Cost of Living crises.

Covid-19: The network continued to deliver vital advice services, albeit via digital and telephony channels. Triage training was available for free to support workers. Advice NI and the network delivered the Covid-19 Community Helpline which was a key support channel for those seeking emergency food and fuel support, plus public health information.

Social security and Welfare Reform: The Evason Report (2016) stated:

“It is acknowledged in the [Fresh Start] Agreement that access to skilled, independent advice will be of critical importance in managing, and helping people to negotiate, all of the changes in the legislation”²⁴

Cost of Living: Inflation, a decade of austerity welfare measures, and other factors have contributed to a harsh and immediate Cost of Living crisis, which started in late 2021, and continues in 2023.²⁵ It has left many financially unable to cope, and who are then obliged to access foodbanks – this includes those who work and claim Universal Credit.

²³ [Annual Report 2022 | Advice NI](#)

²⁴ [Welfare Reform Mitigations Working Group Report | The Executive Office \(executiveoffice-ni.gov.uk\)](#)

²⁵ [Finder.com: CoL Stats.](#)

“When Universal Credit goes live in an area, there is a demonstrable increase in demand in local Trussell Trust foodbanks. On average, 12 months after roll-out, food banks see a 52% increase in demand.”²⁶

Advice NI produced a range of Cost of Living information briefings and factsheets, outlining ways in which the public can access additional support and advice on managing bills²⁷.

Advice NI & the Anti-Poverty Strategy

The Department for Communities funds and supports regional advice services provided by Advice NI and Law Centre NI. This funding is delivered through the Department’s Regional Infrastructure Programme. Funding for frontline local advice services is delivered through the joint Department / Council Community Support Programme. The Anti-Poverty Strategy Expert Advisory Panel²⁸ made a range of recommendations linked to the key role of the independent advice network. The following are highlighted, as they should have immediate bearing on The Executive Office’s budget allocation decision-making, for 2023-24:

“ix. Require the ‘poverty proofing’ of policies across public and arms-length bodies through the introduction of the ‘socio-economic duty’ set out in Section 1 of the Equality Act 2010. This requires **public bodies, ‘when making decisions of a strategic nature about how to exercise their functions, to have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage’.**” [Advice NI emphasis]

The EQIA does highlight that budget reductions will have adverse effects on certain groups and sub-groups; however, having acknowledged this, it is vital that The Executive Office does everything possible to reduce and mitigate these harms, particularly for the most vulnerable.

²⁶ [Trussell Trust Foodbank Use](#)

²⁷ [Advice NI Cost of Living Information](#)

²⁸ [Anti Poverty Expert Advisory Panel Report](#)

EQIA excerpts & Advice NI responses:

Racial Group

EQIA Excerpt: An analysis of the information held by TEO indicates that a reduction in budget is likely to have a negative impact on good relations between people of different religious belief, political opinion or racial group....The Minority Ethnic Development Fund (circa £1.2m per annum) provides support for voluntary and community organisations working with and representing minority ethnic people and groups. The Crisis Fund (circa £200k per annum) provides small sums of money at key moments for minority ethnic people and migrant workers, such as after losing work, reduced hours, or family breakdown.... Together they are the only direct funding schemes to support implementation of the Racial Equality Strategy for Northern Ireland. We are aware of specific risks to refugee and migrant women in relation to VAWG [Violence Against Women and Girls]

Advice NI Response: TEO states it is aware of specific risks to refugee and migrant women in relation to VAWG. If funding is cut re: support for this group, this surely demonstrates a clear example of differential impact, in that the risk is heightened specifically for refugee and migrant women.

The Executive Office must implement a more inclusive and fair approach when considering policies, and providing services to the migrant population in Northern Ireland; particularly around work and benefits. To tackle disadvantage, it is vital for The Executive Office to promote access to justice, for those for whom English is not a first language.

Equality NI noted that: ‘Migrant workers and new residents experience difficulties in accessing health and social care services.....For example, projects such as STEP... have reported difficulties for those from minority ethnic communities trying to avail of public health provision.²⁹. As the only direct funding scheme to support the Racial Equality Strategy, and provide small cash injections at a time the applicants need it most, The Crisis Fund is crucial to provide much-needed help for migrant workers in crisis.

When limited leave to enter is granted to a person to visit, study, work, or join family in N.I, they will have the ‘no recourse to public funds’ (NRPF) condition imposed. For immigration purposes, the term ‘public funds’ applies to certain benefits.³⁰ In Northern Ireland, there are few support options for individuals with NRPF; they are forced to rely on food banks to survive, but still have rent and other essential bills to pay. The breakdown of a relationship between a couple with international backgrounds can also lead to complex immigration issues, especially when one partner relies on the other’s immigration status to remain³¹

If the Minority Ethnic Development Fund has its funding reduced, there are little to no other services that can fill the void left.

²⁹Centre for Cross Border Studies et al (2006) Improving Government Service Delivery to Minority Ethnic Groups

³⁰ [NRPF Network](#)

³¹ [DavidsonMorris.com](#)

Gender

- Expenditure on the development of the Equally Safe strategy has necessarily been largely on staff costs to date. Plans for 2023/2024 would have seen the beginning of an implementation programme and campaign. Gender violence is more prevalent and the impacts are more severe among women and girls — 79% of all victims of sexual offences recorded by PSNI were female (Trends in Police Recorded Crime in Northern Ireland), 68% of victims of domestic abuse crimes were female.... Reduction of funding to the EVAWG programme will result in negative impacts to women and girls.... impacts on women and girls in all other Section75 groups have been identified and will be addressed within the programme

Advice NI response: Again, restriction of funds to the EVAWG impact women. Aside from the devastating impact of domestic violence on the individual, there is also a ripple effect on society at large. The IMF states:

‘Violence against women and girls has a multi-dimensional effect on the overall health of an economy both in the short-term and long-term. In the short term, women from abusive homes are likely to work fewer hours and be less productive when they do work. In the long run, high levels of domestic violence can decrease the number of women in the workforce, minimize women’s acquisition of skills and education, and result in less public investment overall as more public resources are channelled to health and judicial services.’³²

LSE reported that the devastating impact of the Covid-19 pandemic on the UK was exacerbated by fault-lines in the welfare state and public services that developed in the previous five years³³. Furthermore, the crises as listed in this response, such as Welfare Reform [Benefit Cap, 2-Child Limit] and Covid have already had a cumulative, negative effect on many women across N.I.: The Covid-19 pandemic has worsened the situation for many women in terms of health, employment and unpaid work, resulting in increased levels of poverty, debt and mental health deterioration. Violence and financial abuse against women and girls continue to intensify during the local and national lockdowns³⁴.

The EQAI states that Reduction of funding to the EVAWG will result in negative impacts to women and girls. One of the objectives in the proposed EVAWG strategy Call for Views Summary Report 2022³⁵ was:

‘Victims and survivors must be able to trust the services provided, and those services must have long term sustainable funding in order to be responsive to their needs. These services need to be better joined up and multi-agency in approach.’, However if the funding is reduced it is difficult to see how these services can be maintained.

³² [International Monetary Fund Domestic Violence](#)

³³ [LSE: Fault lines in the welfare state](#)

³⁴ [Womens Budget Group](#)

³⁵ [EVAWG Call for Evidence](#)

Disability

- People with a disability face significant challenges and are often within the most disadvantaged and excluded sections of society. Cuts to funding are likely to have a particularly adverse impact on this group who may benefit from participation in CGRF projects.... In 2021/22, between 6,000-7,000 of CGRF participants had a disability or illness. The latest outcomes show 14% of participants in DCGRP have a disability... the impact on the disabled community could be disproportionately negative. The EVAWG Call for Views responses quoted rates of 1:2 D/deaf and disabled women suffering gender violence, including specific risks from carers'

Advice NI Response: As people with a disability [like other vulnerable groups] are arguably already disadvantaged, to such an extent that specific legislation has to exist to challenge this and ensure equality³⁶, it is difficult to accept that funding will be cut to this group. People living with a disability face extra costs on average of £570 a month as a result of their impairment, according to disability charity Scope. This 'disability price tag' costs an average of £6,840 a year; however one in four disabled people pay over £12,000 a year extra due to their condition³⁷.

While costs obviously vary, across a range of disabilities, the facts show that basic living is more expensive for those who are disabled. The EQIA also points out that the Equality Commission's discrimination advice and support is more often sought on the grounds of disability (50% enquiries), and cuts therefore would have a disproportionate impact³⁸.

Data show that people with disabilities in low- and middle-income countries are poorer than their nondisabled peers in terms of access to education, healthcare, employment, income, justice, social support and civic involvement³⁹. With the opportunities for inclusion being reduced or removed, the social support for, and civic involvement by, disabled people, will inevitably plummet.

Again it is important to highlight the subgroups of society who have more than 1 'vulnerability', e.g. Children and adults with disabilities are at higher risk of physical, sexual and other forms of violence. Then consider women with disabilities [who] often experience double discrimination that can extend to all areas of life⁴⁰.

END

³⁶ [Nidirect - Your rights if you have a disability](#)

³⁷ [Turn2Us Cost of Disability](#)

³⁸ [TEO Equality Impact Assessment](#)

³⁹ [Disability Inclusion Govt Publishing Service](#)

⁴⁰ IBID



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