

BCC Draft Response to DfE Resource Budget 2023 – 24 EQIA

Link to DfE Consultation: [Budget 2023-24 Equality Impact Assessment](#)

Consultation Questions

1. Do you agree that DfE has gathered the necessary data to inform its decisions around the allocation of its budget? If not, what other sources of data should the Department consider?

Response: No. While we note your comments in relation to similar concerns raised in the ‘Initial Period Consultation Response’, we feel that the EQIA may have been limited in two other important ways.

Firstly, while we agree that such extensive cuts will impact all members of society, we do not agree with your fundamental assumption that with “the impact being felt across all section 75 (s75) groups, therefore, as no one section is disproportionately impacted at the expense of another.” This thinking appears to be more in line with providing ‘equal treatment’ rather than ‘equality of opportunity.’ Our approach to EQIA is to determine if cuts will have a disproportionate impact on any s75 group (or multiple identities) based on the differences in need of those groups. To give a very basic example, people with disabilities are statistically more likely to be unemployed. The 2021 Labour Force Survey reports that there is a 41-percentage point disability employment gap within Belfast (37.2% of people with a disability are employed compared with 78.1% of people with no disability who are employed). To cut services that help people into employment will affect all s75 categories as you have assumed. However, while all people will experience an ‘*equal treatment*’ in that the programme will be cut; proportionally more people with disabilities are in need of the ‘*opportunities*’ provided by these programmes and hence there will be a ‘*bigger proportional impact*’ on people with disabilities.

Secondly, the sources of data that you have listed, appear to focus primarily on people (and hence s75 breakdowns) who are currently using the service. While that is understandable, it does not seem to be a thorough means of assessing the *potential* impact of cuts.

We suggest that there should also have been more reference to the s75 breakdown of people who are in need of the services, funding, and arm’s length support of your funded organisations. For example, two of your main work areas (Skills for the 10x economy, and TourismNI) are of significance to the unemployed, long-term unemployed, and low skilled people who are trying to get onto the employment ladder. Statistically young people, people from ethnic minorities (especially Travellers), people with disabilities, and those with caring responsibilities are more likely to need help finding employment, being retrained or to be helped starting a business. Therefore, cuts in these areas are more likely to have a more adverse impact on their ‘equality of opportunity.’

It may be that our understanding is incorrect and that your EQIA did attempt to consider this data via detailed reviews of the census, employment statistics, Business Register and Employment Survey, etc. However, as others highlighted in the ‘Initial Period Consultation Response’ you did not provide the specific data that was used. Therefore, we can’t suggest additional data for you to consider, as

you may have already done so. Instead, we would like to highlight a few of the types of statistics that we hope have been considered in this EQIA.

- Employment rate of people with disabilities - 37.3%
- Employment rate of people without disabilities - 79.6%
- Economically inactive rate of people with disabilities - 59.2%
- Economically inactive rate of people without disabilities - 17.8%
- Economically inactive rate aged 16 to 24 - 50.7%
- Economically inactive rate aged 25 to 34 - 15.9%
- Economically inactive rate aged 35 to 49 - 14.1%
- Economically inactive rate aged 50 to 64 - 34.1%

It is also difficult to understand why the largest cuts being to education providers did not register as having a disproportionate impact on the S75 age category, where the majority of those affected will be young people.

2. Do you agree with DfE's assessment of the proposals for budget reductions? If not, what other areas of the Department's spend should be considered?

Response: No. While we understand that the unprecedented requirement means that difficult choices need to be made, we would still like to highlight some areas.

Firstly, the 33% cut to Tourism NI seems especially severe when the sector was one of the most affected by the Covid pandemic. The sector is also one of the areas of potential growth that also allows access to employment for those who may find employment in other sectors difficult due to lack of qualifications, experience etc. As highlighted in our other responses, this sector is likely to be disproportionately represented by s75 groups including ethnic minorities, young people, and those with disabilities.

The proposed cuts to Invest NI also seem proportionally high. From the limited financial information available, they appear to also amount to about a quarter of the budget being cut (£73m left after £26m reduction). It would be useful to know what guidance the Department will give to Invest NI in terms of instructing its future priorities. In particular, will the focus be in supporting local investment or attracting FDI?

3. Do you agree with DfE's assessment of equality impacts of the options considered for budget reductions? If not, what other equality impacts does the Department need to take account of?

Response: No. As already alluded to, there is insufficient information to know exactly what consideration the department has made when reaching its conclusions and recommendations. There is also insufficient information about how the cuts will be directed. The information provided in your papers is very top level.

So, to repeat the point in our response to Q1) we feel there is a potential impact on multiple s75 categories with these reductions. As a top-level summary: anything impacting on future skills development, job/employment creation, business starts or support for sectors with lower qualification requirements; is likely to have a disproportionate impact dependant on racial group, age, disability, people with dependants and potentially gender, and religious backgrounds.

4. Do you agree that DfE has correctly identified all relevant mitigations that could help reduce the adverse equality impacts of the budget reductions? If not, what additional mitigation measures should the Department consider?

Response: No. Considering our previous responses, we do not believe that all potential impacts have been identified and hence it is not possible to develop all relevant mitigations. The consultation also does not provide any significant information on proposed mitigations other than the draft revised budget.

We would add that it is disappointing that no mention is made of potential means to raise additional revenue to offset some of the proposed cuts. We have not had the time to undertake a particular review of what those potential revenues may look like, but examples from elsewhere include: increased monetising of HE research; efforts to attract scholarships through philanthropists and also directly from major FDI; an increase in international students; potential loan based partial payback of certain education or business programmes; tourism tax, etc. Please note, we are not suggesting that any of these ideas are fully appropriate, we just quote them as examples of ways that additional income may be generated.

5. Do you agree with DfE's overall assessment of the business areas where the proposed budget reductions will need to be made? If not, which areas of the Department's business would be better able to withstand reductions?

Response: see the response to question 2.

6. Do you have any other comments you would like to add about this consultation – yes or no?

Response: We fully agree with the points raised in the 'Other consideration section.' In particular, we agree with the additional risk to NI, which is already behind other competitor regions, and is therefore ill-placed to endure further reduction in its efforts to increase its competitiveness.

Going forward, these budget reductions are going to increase the importance of the various departments, arm's length bodies, independent bodies, councils, major stakeholders, and the third sector working even more closely together. We hope to be able to enhance our cooperation with all our partners to maximise the resources, experience and knowledge we all have, to minimise these impacts as much as possible.