

18 July 2023



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Email: Budget23-24response@health-ni.gov.uk

Reference: DoH EQIA Consultation Report on the 2023-24 Resource Budget

To whom it may concern

Mid Ulster District Council would like to take this opportunity to provide comments on DoH Resource Budget 2023-24 Equality Impact Assessment. It is Mid Ulster Council's understanding that the outcome of the implementation of these proposed budget cuts has the potential to services changes and reductions in the following areas:

- Reduce funding for Waiting List Initiatives
- Reduce Family Health Service Spending
- Reduce Funding for the implementation of the Integrated Care System
- Reduction in funding for Digital Improvements
- Removal of Some Critical Shift Payments to Trust staff
- Restrict Range of Core Demand Led Services across Acute and Community Services
- Increase Car Parking Charges to Full Cost Recovery
- Remove Free Flu vaccine for 50–64-year-olds
- Medium Impact ALB (excluding Trusts)
- Saving Measures including efficiency savings in PHA core budgets, reductions in health improvement programmes
- Further reductions in public information campaigns
- Reductions in Northern Ireland Fire and Rescue Service (NIFRS) Public Fire Safety and Prevention campaigns

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From examination of the proposed cuts and their anticipated impacts it is clear that the cuts will significantly negatively impact on S75 groups in a cross sectoral way, particularly people with disabilities, people with dependents, various age groups and gender impact. In addition, implementing cuts of this nature seems to go against the overall long term strategic priorities of the Department.

General Comments

Mid Ulster District Council would also have concerns in relation to impact upon capital expenditures. The Council would seek reassurance that the reduction in planned capital allocations for estate and backlog maintenance, investment in the upgrade of GP Practices will not undermine the reallocation and centralisation of services across the Southern and Northern Trust areas; including the removal of maternity delivery services from Causeway Hospital and the removal of emergency surgical provision from Daisy Hill Hospital. The centralisation of both these services required improvements to be made to Craigavon Area Hospital and Antrim Area Hospital respectively. Without these upgrades it is difficult to fathom how the existing facilities and estates could cope with the additional demand on beds.

In addition the Council is well aware of the need for capital improvements across the Trust area and therefore is deeply concerned that the capital investment programme that the Department had planned to take forward over the next 10 years in acute, primary, social care, mental health facilities, cancer strategy, digital technology and in emergency services may be delayed. The consultation information also details that the Department is not currently in position to make a pay offer to its staff. The Council has also responded to several Trust led consultations in recent months. A common thread amongst these consultations was staffing issues and the absence of successful long-term recruitment strategies. Therefore, the combination of not having the ability to make pay offers to staff as well as not being able to maintain estates and deliver on capital build commitments, paints an extremely grave and concerning picture for the future of health service delivery in NI.

Furthermore, with regard to the potential impact of savings measures not yet taken including:

- Reduction in payments for support services provided by the Community and Voluntary Sector.
- Reduction in the amount of Community Aids and Adaptations to clients living in their own homes
- Further reductions in Waiting List Initiative (WLI) activity
- Reduction in nursing and residential care placements

- Restriction of domiciliary care packages
- Reduction in payments for support services provided by the Community and Voluntary Sector
- Reduction in the amount of Community Aids and Adaptations to clients living in their own homes
- Reduction in nursing and residential care placements

The Council would disagree in the strongest of terms, with these proposals. Services in these areas are already at breaking point and the negative impacts would be hard to quantify across Section 75 categories. However, what is clear, is that the most vulnerable members of society would suffer the most should these additional saving measures be implemented.

Mitigations

While the Council appreciate that it is difficult to make funding cuts across any area removal of which will have a significantly negative impact across Section 75 groupings, the Department does not seem to have presented any significant mitigations or alternatives within the EQIA. There is also little clarity in relation to whether or not the Department has any priority areas for introducing mitigations or alternative, should additional funding be identified or secured.

Consultation Timeline

It is the opinion of the Council that this consultation would have benefited immensely from opportunities to fully discuss the budget proposals and their implications. Additional consultation opportunities would have also allowed impacted groupings to ask questions and seek clarifications. The opportunity for additional consultation mechanisms would also have been an important opportunity for the Department to demonstrate that it is open to changing the current proposals. Some decisions seem to have been made prior to the EQIA being conducted therefore it is difficult for the Department to demonstrate appropriate consideration being given to potential equality impacts.

Finally, while the Council understands the constrained timeframes in relation to decisions in relation to the 23/24 budgets, the Department will be aware that holding consultations during popular holiday periods is also not conducive to encouraging significant levels of feedback.

Cumulative Negative Impact

It cannot be ignored that this consultation is not being held in isolation. The majority of NI Assembly Departments have recently consulted across short timeframes on drastically reduced budgets. It is clear that each of these budgets focused on EQIAs that identified negative impacts across Section 75 groups. The overall result is a devastating cumulative impact on some of the most vulnerable people in society.

There is also an overall lack of joined up thinking in relation to the proposals made across four Departments. Each Department seems to be viewing their budgets in isolation without documenting the issues created by multi-sectoral cuts that will directly negatively impact upon some of the most vulnerable and most marginalised in society. This is particularly concerning in relation to the lack of joined up discussion between this Department and the Department of Education, given the considerable overlap between the two Departments in relation to early years and SEN.

Rural Needs

Mid Ulster District Council welcomes that the Department has attempted to demonstrate due regard to the Rural Needs as they are required to do under the Rural Needs Act 2016. However, these proposals will clearly have a more significant impact on those in rural areas in relation to access to services and as such it would have been beneficial to provide a copy of the Rural Needs Impact Assessment as part of the overall consultation process.

Conclusion

Mid Ulster District Council strongly opposes the outlined budget for 23/24. Overall, the EQIA identifies that the outcome of these proposals will lead to significant inequalities linked directly to, age, disability and gender, among others. Therefore, as a Council we would object in the strongest terms to the removal of support health and support services that are currently provided to some of most vulnerable and to the vast majority of Section 75 groups.

Yours sincerely

Dominic Molloy
Council Chair

18 July 2023



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Reference: EQIA Consultation Report on the 2023-24 Resource Budget

To whom it may concern

Mid Ulster District Council would like to take this opportunity to provide comments on DE Resource Budget 2023-24 Equality Impact Assessment. It is Mid Ulster Council's understanding that the outcome of the implementation of these proposed budget cuts would lead to a removal or reduction of services in the following areas:

- School Holiday Food Grant
- CCMS
- Healthy Happy Minds
- Engage Programme
- Extended Schools
- Leargas
- Bready District Ulster Scots Development Association
- North Belfast Principals Support Programme
- Irish medium preschool support service
- Extended Services Funding (to pre-schools)

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- Playboard NI Play Policy
- Aggregated Schools Budget
- BookStart Programme
- Budget reductions to SEN
- Belfast Wide Early Years Pilot under Fair Start
- EA Block Grant
- Entitlement Framework
- Getting Ready to Learn Programme

From examination of the proposed cuts and their anticipated impacts it is clear that the cuts will significantly negatively impact on S75 groups in a cross sectoral way. The EQIA identifies a likely 'major' adverse impact on children and young people, children with a disability, race, and dependants. This is particularly evident in relation to SEN students and students from disadvantaged backgrounds, leading to students from disadvantaged backgrounds being obstructed from reaching their full potential.

However, the EQIA, does not however appear to include the full range and/or full detail of policy proposals being considered, including:

- The extent of the budget reductions to the Aggregate Schools Budget (ASB) and the Education Authority Block Grant and the potential impacts of these cuts
- The extent of the budget reductions to Arm's Length Bodies and the potential impacts
- The extent of budget reductions to unspecified third-party organisations supporting curriculum delivery and the likely impacts
- Consideration of the impacts of budget cuts to the capital budget is not covered
- Specific reference in policy proposals to a reduced budget on SEN provision is not included

Mid Ulster District Council also notes that childcare is not included in the EQIA consultation information. Accessible and affordable childcare is directly linked to

women's participation in the labour market, economic independence and promoting equality between men and women. It is widely recognised that early years provision plays a key role in children's development and can have significant beneficial impacts for those children most at risk of educational underachievement.

In addition, 93% of lone parents in Northern Ireland are women. Therefore, the cuts to School Holiday Food Grant will have a major negative impact on women. This is not reflected in the information included in the EQIA. When this impact is taken within the context of the cuts proposed across NI Departments, the impact is significantly negative. The Department claims to 'provide benefit to all children and young people across NI', however removal of these services/benefits impact not just on children and young people but on their parents and carers as well.

Consultation Timeline

It is the opinion of the Council that the short time frame during which this consultation is being carried out would have benefited immensely from opportunities to fully discuss the budget proposals and their implications. Additional consultation opportunities would have also allowed impacted groupings to ask questions and seek clarifications.

The opportunity for additional consultation mechanisms would also have been an important opportunity for DE to demonstrate that it is open to changing the current proposals. Some decisions seem to have been made prior to the EQIA being conducted therefore it is difficult for DE to demonstrate appropriate consideration being given to potential equality impacts.

Finally, while the Council understands the constrained timeframes in relation to decisions in relation to the 23/24 budgets, the Department will be aware that holding consultations during popular holiday periods is also not conducive to encouraging significant levels of feedback.

Cumulative Negative Impact

While the Department have referenced the cumulative impact of the proposed cuts within its particular service area, it cannot be ignored that this consultation is not being held in isolation. A plethora of NI Assembly Departments have already or are currently consulting across short timeframes on drastically reduced budgets. It is clear that each of these budget focused EQIAs identify negative impacts across Section 75 groups. The overall result is a devastating cumulative impact on some of the most vulnerable people in society.

Overall, there is a lack of joined up thinking in relation to the proposals made across Departments. Each Department seems to be viewing only their budgets in isolation without documenting the issues created by multi-sectoral cuts that will directly negatively impact upon some of the most vulnerable and most marginalised in society. Therefore, as a Council we would object in the strongest terms to the removal of these services that are currently provided to some of most vulnerable people within Section 75 groups.

Rural Needs

In relation to this consultation Mid Ulster District Council believe that the Department has failed to demonstrate that due regard has been paid to the Rural Needs Act 2016. The cuts clearly have a significant impact on rural dwellers, however the relevant Rural Needs Impact Assessment information has not accompanied this consultation and as such the influence of rural needs requirements are not reflected in the significantly reduced budgetary provisions. In addition, in the absence of a documented assessment, no rural needs mitigations have been made available in relation to these proposals. DAERA, who oversee the implementation of the Act are clear that a Rural Needs Impact Assessment should not be completed retrospectively. Therefore, any assessment that follows this consultation period is not useful because the time for its influence on decision making will have already passed.

The Council have liaised with Rural Community Network (RCN) in relation to the development of this response. RCN highlighted the negative impact to proposed cuts to the Engage, Happy Healthy Minds and Extended Schools programmes. Given that research has demonstrated that LGBTQI+ children and young people are at significantly increased risk of mental health challenges, bullying, family difficulties and isolation, these programmes provide needed support and reprieve. Removal of these services could be really detrimental for an LGBTQI+ child or young person which is likely additionally challenging for LGBTQI+ child who live in rural communities.

Conclusion

Mid Ulster District Council strongly opposes DE's outlined budget for 23/24. These cuts are being proposed at a time when it was reported in various media outlets that around 390 children SEN in Northern Ireland are still waiting for a suitable school place for September 2023. If this is the case prior to the implementation of the proposed cuts, there is little hope that a sustainable delivery model of education can be established by DE and EA within these revised further under resourced financial conditions.

Overall, the EQIA identifies that the outcome of these proposals will lead to significant inequalities linked directly to, ethnicity, disability and gender, among others. These inequalities will more than likely, have lifelong negative impact on an individual's education pathways. From the perspective of the Council, continuing with these proposals in the face of the stark realities is unworkable and therefore the proposals should be fully reconsidered.

Yours sincerely

Dominic Molloy

Council Chair

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