



Commissioner for **Older People**
for Northern Ireland

Financial Management Directorate
Department for Communities
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Re: Budget 2023-24 Equality Impact Assessment Public Consultation

Dear Sir / Madam

I am writing on behalf of the Commissioner for Older People for Northern Ireland (COPNI) regarding the adverse impact on older citizens of the proposed Department for Communities' Budget.

The Commissioner strenuously objects to the proposals outlined in the Consultation document insofar as they would constitute a disproportionate harm to older citizens. COPNI recognises the financial constraints on the Department for Communities. We recognise that '[funding] shortfalls of this magnitude will undoubtedly have a significant and adverse impact on the Department's ability to deliver public services' (1.7). Indeed, we agree fully that:

a number of Section 75 groups including older people and people with a disability including mental health and learning disabilities may be disproportionately impacted by a reduction in funding. (p.23)

The cuts to funding being contemplated—including to the Supporting People Programme; third party organisations providing community and voluntary networks; Arm's Length Bodies providing tailored support; and the Affordable Warmth Scheme—would disproportionately hit older citizens. As older people are less likely to be in paid employment, experience higher levels of poverty and endure increased levels of serious long term health conditions, such cuts would represent an unfair burden on

this section of society.^{1 2} Therefore, it is vital that everything should be done to avoid the harm inherent in the cuts outlined in the EQIA.

Section 3.1 of the Consultation document states:

In allocating Budgets, the Department aims to avoid any adverse impacts and where possible, action will be taken to mitigate against specific adverse impacts and consider alternative policies which might better achieve the promotion of equality of opportunity.

Yet, in contrast, the document acknowledges that ‘older people...may be disproportionately impacted by a reduction in funding’ (p.23). This Equality Impact Assessment makes explicit that funding decisions are being considered which are likely to unfairly affect certain sections of our society, in the case of older people a section of society already hard-pressed.

COPNI accepts the reality of the current funding situation: ‘cuts to services and supports the Department provides [are] inevitable’ (s.7.7). COPNI does not accept that such cuts should fall more heavily on some sections of our community, least of all those who are most in need.

Choosing options which result in the termination or reduction of services relied on by older people would represent a conscious choice against older citizens. The office of the Commissioner for Older People for Northern Ireland rejects, without caveat, these proposals which would visit disproportionate harm on older people and undermine the principle of equal citizenship.

Best wishes

Conn Mac Gabhann

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¹ Pensioners in Northern Ireland, experience an absolute poverty level of 17% and a relative poverty level of 21%, *Northern Ireland Poverty and Income Inequality Report, 2021/22*, NISRA, 2023, available at: <https://www.communities-ni.gov.uk/system/files/publications/communities/ni-poverty-income-inequality-report-202122.pdf>

² Prevalence increased with age with 19% of those aged 16-24 reporting a limiting long-term condition compared with 53% of those aged 75 and over, *Health Survey (NI) First Results 2021/22*, DoH, 2022, available at: <https://www.health-ni.gov.uk/sites/default/files/publications/health/hsni-first-results-21-22.pdf>