

Northern Ireland Women's European Platform

Response to the survey for Private Members' Bill on Gender Budgeting Emma Sheerin MLA

August 2021

1. Introduction

Northern Ireland Women's European Platform (NIWEP) welcomes the opportunity to contribute to the development of the Gender Budgeting Bill.

NIWEP is a membership organisation of women's NGOs in Northern Ireland. Established as the Northern Ireland link to the European Women's Lobby, the EU's expert body on women's rights and gender equality, NIWEP also has special consultative status with the UN. A key role for NIWEP is promoting gender responsive policy and decision making at local, regional and national level taking account of the state's international obligations, while also ensuring women and girls are engaged in policy and decision making. NIWEP also works to share information and good practice at international level with local members and stakeholders, and highlight local learning and good practice internationally.

NIWEP's core objectives involve raising awareness and promoting implementation of key international human rights treaties and initiatives, including the Convention on the Elimination of All Discrimination against Women (CEDAW). NIWEP views implementing the recommendations of CEDAW as a clear roadmap and mechanism to ensuring women's human rights are fully met and upheld in Northern Ireland, and the implementation of the UK's international obligations as a cornerstone of both upholding human rights domestically and taking a leading role in advocating for human rights internationally.

2. General comments

NIWEP strongly supports this Private Members' Bill. Gender budgeting is an important and effective tool for evidence based decision making, and contributes to ensuring effective use of resources across policy areas. It is particularly helpful in enabling monitoring and evaluation of how investment and allocation of public resources impacts on different population groups, and as such contributes to creating the data and evidence base required for effective financial planning and budgeting. Thus, gender budgeting helps ensure budgeting and resourcing that meets the needs of all population groups, while it also helps highlight how public funding impacts on women, where there are gaps and how initiatives, programmes and projects can be developed to create benefits for women, as well as other population groups.¹

Gender budgeting is a central component of gender mainstreaming, or a policy making approach where gender equality is integral to all policy and decision making. While there is limited evidence of such an approach in policy making in Northern Ireland at present, introducing a requirement for gender budgeting can create the evidence and data base required to effectively implement gender

¹ Women's Budget Group (2018) <u>Gender responsive budgeting</u>

mainstreaming, and as such it is a critical enabler for a new approach to decision making. Longer term, it is important that gender budgeting is complemented by a commitment to more comprehensive gender mainstreaming, to ensure that policy makers take account of gender equality as a core element from the outset of all policy making. To ensure this, capacity building on gender budgeting should be made available to all policy and decision makers, not only those in financial and budget planning, and capacity building should highlight how gender budgeting aligns with other areas of policy making to progressively realise gender equality.

NIWEP welcomes the focus in the consultation document on gender inequalities, and in particular the emphasis on women as major users of public services and therefore a key group affected by public budgeting and resourcing. This is typically overlooked in policy making processes, and is a key reason why gender inequalities are perpetuated through existing policy making models. However, it would be helpful to ensure a fully inclusive and intersectional approach by including specific and explicit reference to the intersectional element of discrimination, which means, for example, that women from Black and minoritised backgrounds, as well as women with disabilities and LBTIQ+ women, experience multiple and intersecting, typically deeper discrimination than white, cisgender and heterosexual and/or able bodied women. Gender budgeting offers a tool for understanding the impact of public policies and resourcing on all population groups, but this requires strong and appropriately detailed data collection.

NIWEP particularly welcomes the focus on data collection in the consultation document. Gender budgeting relies on appropriate data and, specifically, on sex/gender disaggregated data. This is a fundamental current issue in Northern Ireland, as only a fraction of routinely collected data is disaggregated in any way, and a very small fraction is disaggregrated by gender. The lack of attention to gender equality in decision making can be seen at least in part as a consequence of a lack of data, while the lack of data in itself demonstrates a lack of understanding and commitment to gender equality and gender mainstreaming. Addressing this is a primary and necessary measure to enable meaningful gender budgeting, and therefore it is essential that any legislation includes clear guidance and rules regarding data collection and disaggregation.

3. Comment on questions

1. Do you feel that there has been sufficient progress in the promotion of gender equality over the past 10 years?

- O Yes
- No
- O Not sure

Comment:

There is long standing evidence of very low priority given to gender equality in Northern Ireland.

This is an excerpt from a shadow civil society report to the CEDAW Committee, which will be submitted in September in response to a call for an interim report:

There has been no meaningful, focused action to secure gender equality or implement the Concluding Observations since 2019. There is virtually no mention of gender in the New Decade, New Approach agreement that underpinned the return of devolved institutions in January 2020². In

² New Decade, New Approach agreement 8 January 2020

Northern Ireland, the need remains for equality law to be harmonised and simplified to address significant inconsistencies and anomalies. Differences with Great Britain remain such as the absence of protection against discrimination and harassment by public bodies on grounds of sex when carrying out their public functions. In addition, gaps in legislation relating to other grounds have a potential impact on women. For example, there is no protection on the ground of age beyond the workplace.

There has also been limited progress on addressing violence against women and girls. Following murders of several women in England and Northern Ireland, which attracted major outrage from the public as well as the women's sector, te Northern Ireland Assembly passed a motion in support of a strategy on 23 March 2021.³ Subsequently the Northern Ireland Executive made a commitment to develop a strategy on violence against women and girls⁴, but this remains at preparation stage.

The last Gender Equality Strategy officially expired in 2016⁵, and a work towards new Strategy was only announced in September 2020, as part of a suite of social inclusion strategies proposed in the New Decade, New Approach agreement⁶. This suite of strategies also includes a Sexual Orientation Strategy⁷, a new strategy long called for by civil society. Work on these strategies began in late 2020 and a final strategy is expected in late 2021⁸. The process includes engagement with the women's sector through an expert panel and a co design group⁹; however, the effectiveness of this process cannot yet be assessed.

Crucially, this lack of action is long standing, as detailed in the 2019 Northern Ireland shadow report. The COVID-19 pandemic has further underlined the lack of understanding of gender equality and the low priority given to women and gender equality in policy making in Northern Ireland, while deepening inequalities have worsened living conditions for women and girls.

Question Title

2. Do you think government policies overlook the specific needs of, or impacts on, women? For example, in the provision of healthcare, social security, education etc. Please include an example of your own experience if possible.

- Yes
- O No
- O Not sure

Comment: As outlined above, gender equality and the needs of women are routinely overlooked in current policy making, which is decidedly gender blind. The particularly glaring omission is legislation and policy that effectively protects women and girls from gender based violence, which has been repeatedly highlighted by the CEDAW Committee and which led the Committee to issue a recommendation to 'put protections of women in Northern Ireland on an equal footing with those for women elsewhere in the UK' in the 2019 Concluding Observations.¹⁰

³ Northern Ireland Assembly motion Tuesday 23 March 2021

⁴ BBC News 18 March 2021 'Naomi Long: Executive 'must act on violence against women'

⁵ Department for Communities Gender Equality Strategy 2006-2016

⁶ New Decade, New Approach agreement 8 January 2020

⁷ 'Minister announces work is to commence on development of Social Inclusion Strategies', Northern Ireland Executive press release 24 September 2020

⁸ <u>Timetable for development of Social Inclusion Strategies</u>, Department for Communities website, last accessed 24 November 2020

⁹ Ibidem

¹⁰ CEDAW Committee (March 2019) Concluding Observations on the 8th periodic report of the UK

The gender neutral domestic violence strategy and the lack of a strategy on violence against women and girls (VAWG) are related examples of where gender equality and disproportionate impacts on women and girls are grossly overlooked. While commitment to a strategy on VAWG has now been made, it is of significant concern that a Ministerial response to an Assembly Question on this issue as late as March 2021 stated that '*Domestic Abuse has no boundaries, it affects everyone and it is vital that we ensure inclusivity of all sections of the community in taking work in this area forward. I would have concerns that the adoption of a gender-sensitive domestic violence strategy would send out a message that tackling abuse against men is less important.*'¹¹

A further, equally significant omission is the effective implementation of abortion services in Northern Ireland. In 2010, NIWEP was among organisations instigating the Inquiry into abortion legislation in Northern Ireland under the Optional Protocol to CEDAW, which found that legislation before 2018 was a grave breach of women's human rights.¹² It is of major concern that despite decriminalisation of abortion in 2019, two years on services are still not commissioned and women continue to be forced to travel to England, even during a pandemic. This highlights the intersection of particular ideological and belief systems and women's rights, where even in a policy making setting international obligations, domestic legislation and public opinion¹³ are ignored.

As a final example, the ongoing pandemic provides a clear example of how gender equality and the needs of women and girls, as well as the impacts of policy on women and girls, are ignored. From a very early stage, it has been evident that the pandemic has a disproportionate impact on women and girls, through increasing care responsibilities, greater health risks associated with both the overrepresentation of women in the care workforce and the increased unpaid caring responsibilities, increased risk of violence and greater risk to jobs and livelihoods, as the sectors hardest hit by the pandemic are dominated by women and young people (and typically low paid). Nevertheless, there is no evidence in current recovery plans that this is taken into account, and the women's sector has been consistently excluded from recovery taskforces and planning groups. This is despite ongoing work to collate and highlight evidence of impacts through the Feminist Recovery Plan¹⁴, which sets out the disproportionate impacts on women and girls in detail.

The lack of commitment to a gender lens in policy making has further been underlined through work by the NI Assembly All Party Group on UNSCR 1325, Women, Peace and Security, which secured a combined response from Departments to the first Plan¹⁵ in September 2020 and has subsequently submitted a series of Assembly Questions to Ministers across the Executive on planned action to address women's needs. This work has clearly demonstrated that there is poor understanding of equality duties within Departments, and limited commitment to gender equality, as responses show no action to support women and girls is planned.

This is directly in conflict with priorities set by the UN, which emphasise investment in social protection and services for women and girls as a cornerstone of sustainable recovery and delivery of the UN Sustainable Development Goals. The UN has called on member states to prioritise women and girls in both the immediate response and recovery.¹⁶¹⁷ This requires a gender lens in all decision making, which also forms part of the Sustainable Development Goals, in particular SDG5 gender equality.¹⁸ The UN also emphasises the importance of comprehensive social protection

¹⁸ See eg. <u>UN SDGs website</u>

¹¹ Response to <u>Written Assembly Question AQW 13950/17-22</u> by Rachel Woods MLA

¹² CEDAW Committee (2018) <u>Inquiry into abortion legislation in Northern Ireland under Article 8 of the Optional</u> <u>Protocol to CEDAW</u>

¹³ Gray, AM (2017) <u>Attitudes to abortion in Northern Ireland</u>

¹⁴ Women's Policy Group (July 2021) <u>Updated Feminist Recovery Plan</u>

¹⁵ Letter 15 September 2020 from Dr Mark Browne to Paula Bradley MLA, chair of APG on UNSCR 1325, Women, Peace and Security

¹⁶ UN (April 2020) <u>UN Secretary-General's policy brief: The impact of COVID-19 on women</u>

¹⁷ See eg. Khan, Z & K Gifford (March 2021) <u>COVID-19 and fiscal policy: Applying gender-responsive budgeting in</u> <u>support and recovery</u>. New York: UN Women.

systems, with targeted support for those on the lowest incomes and most at risk of marginalisation, ensuring gender equal COVID-19 taskforces and developing gender sensitive budgeting.¹⁹ In short, there is an international mandate and urgent call to put women and girls at the centre of the COVID-19 response, to mitigate disproportionate harms on women and support new policies on gender equality in the post pandemic period.

Question Title

3. Do you think government policies should address the issue of the gender pay gap?

- Yes
- No
- O Not sure

Comment:

The 2013 Concluding Observations from the examination of the UK under CEDAW included a recommendation to legislate on the gender pay gap²⁰. Subsequently, the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017²¹ came into force in Great Britain, but no equivalent legislation has been passed to date in Northern Ireland, although draft legislation was prepared prior to the period 2017-20 when institutions were not sitting. It is vital that this legislation is brought to the Assembly as soon as possible, as gender pay gap reporting is one tool in tackling the persistent pay gap between men and women.

Recent research indicates that the gender pay gap remains at around 10 per cent as a headline figure. However, the gap is larger between the significant proportion of women who work part time and men, as well as for women with children and older women, while the gap for women with no children and women and men aged under 40 is smaller. Women, in particular young women, are also overrepresented in the lowest paid occupation sectors.^{22,23}

A frequently highlighted figure indicates a gender pay gap in full time pay in favour of females is largely explained by a very small number of high earning women in senior positions, particularly in the public sector. The response to the Feminist Recovery Plan²⁴ further illustrates the limitations and poor use of equality data, by referencing this figure, alongside slower increase in the employment rate for women and women's enduring high 'economic inactivity rate' without any further analysis.

The pay gap is typically explained by women 'choosing' to work part time, highlighting the impact of gender stereotypes on policy. Action is therefore required at many levels, including cultural attitudes as well as employment legislation and policy, to address perceptions and discriminatory practices. Specifically, this requires action on enablers such as childcare; NISRA figures from 2019 show that over 85 per cent of people economically inactive due to family reasons are women, and that this

¹⁹ Freizer, S, G Azcona et al (June 2020) <u>COVID-19 and women's leadership: From an effective response to building back</u> <u>better</u>

²⁰ CEDAW Committee (2013) <u>Concluding Observations</u> on the 7th periodic report of the United Kingdom of Great Britain and Northern Ireland

²¹ The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017

²² Wilson, L. (2020) <u>How Unequal? The unadjusted gender pay gap in earnings in Northern Ireland and the Republic of</u> <u>Ireland</u>, NERI Working Paper Series, NERI WP 2020/No. 69, Belfast: NERI.

²³ NISRA (November 2020) Northern Ireland Annual Survey of Hours and Earnings publication

²⁴ Letter 15 September 2020 from Dr Mark Browne to Paula Bradley MLA, chair of APG on UNSCR 1325, Women, Peace and Security

reason is cited by a third of all economically inactive women, rising to half of women when students and retirees are excluded.²⁵ Lack of childcare, and adult social care, is therefore directly associated with female poverty, and lack of genuine economic choice among women.

With regard to pay more generally, NIWEP believes that a liveable income for all workers is a basic element of a sustainable economy. This has also been highlighted by the Commission for a Gender Equal Economy as a cornerstone of a caring economy, and as noted above the proposal has public support, which has been evident in the context of the focus on care and essential workers during the ongoing pandemic. NIWEP is concerned that the lowest paid sectors, including adult social care work, are also heavily female dominated, which is a key factor in the gender pay gap, and would urge for a focus on a liveable income in all job creation initiatives. It is not sustainable that in work poverty is the most significant type of poverty, as this increases demand for benefits and public services in a context where employers gain the benefit and workers remain highly vulnerable. NIWEP would therefore urge for public sector pay to be assessed against this wider context, while NIWEP believes that the public sector has responsibilities towards its workforce, which should be honoured in line with commitments.

NIWEP would emphasise that the living wage principle should be extended to cover posts funded through public sector grants. This should include all relevant costs, including legally mandated pension contributions.

Question Title

4. Do you think government policies takes into account the disproportionate impact of unpaid caring responsibilities on women, e.g., women leaving employment to care for a loved one?

- O Yes
- No
- O Not sure

Comment:

As noted above with regard to childcare and women's economic activity as well as the impact of COVID-19 on caring, there is no evidence at present that policy making takes account of the impact of unpaid caring on women. Rather, it appears that policy making builds on traditional cultural expectations that women take this role voluntarily, and thus there is limited public responsibility for providing, organising and resourcing care. This applies in particular to childcare, as Northern Ireland has never had a childcare strategy, but also to adult social care; women either do not enter or are forced to leave the workforce due to lack of public provision. The Northern Ireland Childcare survey 2020 shows that in the year to June 2020, three per cent of parents had to leave the workforce due to lack of mothers had to organise their working hours around caring for children during the first lockdown in spring 2020. The survey also shows that even pre pandemic, 61% of parents reported there was insufficient childcare in their area.²⁶

From a women's perspective, the critical priorities for policy making should focus on investment in care, education and training. An investment in care is essential above all to ensure the growing population of people in need of care can access the care and support they need to live with dignity

²⁵ NISRA (2019) <u>Economic Inactivity in Northern Ireland</u>

²⁶ Employers For Childcare (November 2020) Northern Ireland Childcare Survey 2020

and as independently as possible. It is also vital to reduce the burden of unpaid care on women²⁷ and give women a genuine choice with regard to the labour market. A care economy not only increases women's income and helps address poverty, but also generates revenue as disposable income rises, while reliance on benefits reduces. This is the core recommendation from the UK wide Commission on a Gender Equal Economy, which stresses that a caring economy is a response to structural inequality, as well as a means to realign the economy to support the overall aim of wellbeing in a sustainable way. Importantly, polling for the Commission highlights that over two thirds of respondents are willing to pay more tax to support well paid and secure jobs.²⁸

A care economy will generate jobs, which are both green and sustainable jobs contributing to a resilient and sustainable economy²⁹. A care economy has been highlighted as a vital element of a resilient and sustainable future economy in a range of recent reports, which demonstrate that investment in care can generate significant numbers of jobs; at UK level, it has been estimated that investment bringing the care workforce to 10% of the population could create up to 2.5 million jobs, for men as well as women. This report by Women's Budget Group stresses that investing in care, rather than construction, would also allow for 50% more of investment to be recouped in direct and indirect tax revenue.³⁰ Meanwhile, a new report by the European Institute for Gender Equality (EIGE) shows how the persistent view of caring as 'women's work penalises all women in the workplace, and in particular women with children; the report indicates 60% of women in EU countries have experienced some change to employment conditions as a result of childcare needs and highlights how unpaid work and caring responsibilities drive the gender pay gap. The report emphasises that revaluing care is a basis for transforming policies on care and achieving greater investment in high quality, adequately paid professional care services.³¹

Question Title

5. Do you think that government policies need to address the over-representation of women in low-paid and insecure work?

- Yes
- O No
- O Not sure

Comment:

It is essential that women and girls have genuine choice in terms of work; the comments above regarding care responsibilities are relevant here as well, since many women are forced to accept part time, often low paid work in order to manage care around work.

Further education and professional training is also critical to enable and support women and girls, including the growing cohort of people who have lost jobs and livelihoods in the pandemic, to build new skills and identify new job opportunities. This will be particularly important to respond to the structural changes the Northern Ireland economy is likely to experience as a result of the pandemic and EU exit, including a contraction of the retail and hospitality sectors, potential changes in the agri food and associated sectors and growth in knowledge and skills intensive sectors. Women and

 ²⁷ See eg. Women's Budget Group (2020) <u>Spirals of Inequality: How unpaid care is at the heart of gender inequalities</u>
²⁸ See further information on the Commission for a Gender Equal Economy and the Commission report at <u>WBG</u>
Commission on a Gender-Equal Economy - Womens Budget Group

²⁹ Cohen, M & McGregor, S (May 2020). <u>Towards a Feminist Green New Deal for the UK</u>. London: Women's Budget Group

³⁰ de Henau J & Himmelweit, S (June 2020) <u>A care led recovery from coronavirus</u>. London: Women's Budget Group

³¹ EIGE (2021) Gender inequalities in care and consequences for the labour market

young people are overrepresented in the sectors hardest hit by the pandemic, and it is therefore critical that this is considered when designing and funding further education, including appropriate targeting and support for women and young people to engage with traditionally male dominated sectors. Focusing on apprenticeships and ensuring women and girls both have access to all pathways and that traditionally female dominated apprenticeships are valued and resourced equally with traditionally male dominated apprenticeships offers one way of achieving this.

Gender budgeting offers a tool for highlighting how public policies are linked to the overrepresentation of women in the lowest paid sectors, and what action can be taken to strengthen pay equity.

Question Title

6. How would you currently rate the levels of departmental engagement with women and the women's sector when developing policy? (5 Excellent 1 Poor).

- ^O 5 Excellent
- O 4 Good
- ^O 3 Satisfactory
- ^O 2 Less than satisfactory
- 1 Poor

Comment: There is no systematic approach to engaging women and the women's sector, which makes it very difficult to engage in policy making. The CEDAW Committee has repeatedly issued recommendations to the UK as a whole to strengthen the mechanisms for engaging women, but there has been no progress to date. There is also no evidence as yet that the Gender Equality Strategy will improve the situation, as the strategy has not yet been drafted.

This is an excerpt from the interim shadow report to CEDAW due to be submitted in September:

There has been no action on an oversight mechanism, nor any advocacy by the regional government in Northern Ireland for a UK level oversight mechanism. There is also no formal mechanism for human rights institutions and women's organisations to engage with policy and decision makers. As noted in the opening paragraph, an engagement mechanism is included in the process for developing the new Gender Equality Strategy announced in September 2020; however, the effectiveness of this process cannot yet be determined. The role of civil society and human rights institutions is to inform the strategy and shape actions; decisions are taken by a cross Departmental working group and ultimately the Northern Ireland Executive³². At UK level, an Inquiry was undertaken in early 2021 by the Westminster Women and Equalities Committee on therole of the current Government Equalities Office in putting equality at the heart of government³³. This followed a statement by the Minister for Equalities, Liz Truss, on a new direction for equality by government, which implies a shift away from protected characteristics towards individual characteristics.³⁴

³² <u>Timetable for development of Social Inclusion Strategies</u>, Department for Communities website, last accessed 24 November 2020

³³ Women and Equalities Committee Inquiry January 2021 - <u>The role of the GEO: embedding equalities across</u> <u>Government</u>

³⁴ 'Fight for fairness', Speech by Minister for Women and Equalities Liz Truss, 17 December 2020

The Northern Ireland Assembly incorporates All Party Groups in its operating mechanisms, as informal groups focused on capacity building and information sharing³⁵. The All Party Group on UN Security Council Resolution 1325, Women, Peace and Security³⁶ has offered a mechanism for women's organisations to engage with elected representatives and policy makers, and has enabled highlighting key issues, in particular regarding the impact of COVID-19. However, All Party Groups do not have formal powers and can only serve as mechanisms for raising awareness and developing relationships with decision makers. The Northern Ireland Assembly has a Women's Caucus engaging women MLAs, but this is also a consultative forum only, with no formal powers.

There is no evidence of gender mainstreaming and there have been repeated instances where policy makers have emphasised that considering impacts of women specifically would breach Section 75 of the Northern Ireland Act 1998. Section 75 is a mainstreaming measure and requires a public bodies to have due regard to the need to promote equality of opportunity in all their functions, powers and duties across nine grounds, including sex and marital status³⁷.

Question Title

7. Do you agree that gender budgeting, as proposed in this PMB, could help remedy structural gender inequality through policy development?

- Yes
- No
- O Not sure

Comment: For all the reasons outlined above, gender budgeting is important to remedy structural inequality. Gender budgeting offers an independent, objective tool for assessing, monitoring and evaluating the impact of budgeting and resourcing, which offers a strong evidence base for future policy and decision making.

Question Title

8. Do you agree that women, and the women's sector, should be involved in developing policy and/or departmental strategies to recognise the particular needs of women's from public services?

- Yes
- No
- O Not sure

Comment: As outlined above, engagement of women and the women's sector is essential to achieve meaningfully evidence based policy making. It is also in line with the principles of UN

³⁵ Northern Ireland Assembly information page on All Party Groups, last accessed 27 July 2021

³⁶ <u>Northern Ireland Assembly All Party Group on UNSCR 1325, Women, Peace and Security</u> web page, last accessed 24 November 2020

³⁷ Northern Ireland Act 1998

Security Council Resolution 1325, which places women's leadership and representation in decision making at all levels as one of the central pillars of sustainable peace building.³⁸

Question Title

9. Do you feel that an external body should monitor and report on the promotion of gender equality in policy development and budgeting?

Yes

- No
- O Not sure

Comment: A scrutiny function is essential to monitor the implementation of policy on gender equality as well as budgeting, to ensure effective implementation and address any issues arising. IT would appear that the Equality Commission for Northern Ireland would be appropriately placed to take on such a role, considering the Commission's current role in monitoring and scrutinising equality policy. The Commission would also be in a place to provide relevant authoritative guidance, assisted where relevant by academia and civil society. However, this would need to be adequately resourced to be meaningful.

Question Title

10. Do you feel that policy makers, and civil servants, should be trained to recognise the specific impacts of government policy and budgeting on women and address structural inequality?

Yes

○ No

O Not sure

Comment: This is essential, as outlined above. The response from Departments to the Feminist Recovery Plan demonstrates the very poor understanding of equality duties, which needs to be addressed as a priority to ensure women are not further disadvantaged by policy making. In particular, capacity building focused on addressing stereotypes and myths is vital to ensure policy does not perpetuate harmful beliefs and practices. An intersectional approach is also an essential element of capacity building, as current policy is largely blind to the differential impacts of policy on people vulnerable to discrimination through their specific and intersecting characteristics, including sex, gender, disability status, race, sexual orientation, family status and migrant status. All of these characteristics intersect in multiple and complex ways to shape an individual's experience and must be effectively reflected and addressed in policy making. For example, Black and minoritised women, women with disabilities and LGBTQI+ people are more likely to experience a multitude of inequalities from violence and low income to discrimination in accessing education, employment and services than white women from low income backgrounds, who in turn are significantly more likely to experience discrimination than middle class, cisgender white women.

³⁸ UN Security Council Resolution 1325

Question Title

11. Do you feel that data should show the differing impacts policies have on men and women?

- Yes
- O No
- O Not sure

Comment: As outlined above, assessing, monitoring and evaluating the differential impacts of policies on different population groups is essential for effective and evidence based decision making that also enables efficient use of limited resources.

Question Title

12. Do you feel that data should also show the additional impact that this has on women within minority groupings e.g., women with disabilities, ethnic minority women, (Section 75) etc.?

- Yes
- O No
- O Not sure
- Other (please specify)

Comment: Yes, this is critical to ensure the multiple and intersecting discrimination experienced by people with specific characteristics, including people from BME groups, women with disabilities, younger and older women and LGBTQI+ people. The comments made above outline the reasons for this; applying an intersectional approach is essential to ensure the full complexity of people's lived experiences are taken into account and appropriately addressed in policy and policies do not further deepen disadvantage and discrimination.

Question Title

13. Do you feel that data should also show the impact of government policy on women from economically disadvantaged and rural backgrounds?

- Yes
- No
- O Not sure

Comment: The comments above under Q11 and Q12 also apply here. Rural women and women from economically disadvantaged backgrounds experience specific inequalities and are among the least represented groups in society, and often experience discrimination arising from policy making based on urban, middle class and male conceptions. There is limited evidence of change in most

economically disadvantaged areas over several decades, and this is crucial not only for equitable policy making, but ensuring sustainable peace building.