



Women's Centres Regional Partnership
(WCRP)

Response to the
Equality Impact Assessment
of
Welfare Reform Bill 2009

Women's Centres Regional Partnership (WCRP)

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Introduction

The Women's Centres Regional Partnership (WCRP) is a partnership of four lead women's organisations linking with fourteen frontline women's organisations across Northern Ireland providing support and services to disadvantaged areas.

The four key lead partners of the Partnership are the Women's Resource and Development Agency (WRDA), Women's Support Network (WSN), Northern Ireland Rural Women's Network (NIRWN) and The Women's Centre, Derry. The fourteen Women's Centres are spread across Northern Ireland with seven from the Greater Belfast and Lisburn area, four in the North West and three in Dungannon, Magherafelt and Craigavon. Together the WCRP seeks to develop and strengthen a regional infrastructure which will support community based women's organisations across Northern Ireland.

We welcome the opportunity to comment on the Equality Impact Assessment (EQIA) on the Welfare Reform Bill 2009. At the centre of the proposals is the objective to provide help and support to realise the government's aspiration to increase its employment rates. WCRP advocate supporting people, especially vulnerable groups into sustainable employment, for the betterment to their quality of living. Circumstances, such as childcare, mental health, availability of appropriate employment and caring responsibilities need to be central to the proposals also. WCRP have a number of concerns we would like to highlight, that we believe will have an adverse impact on women who have not been considered as part of the EQIA.

Lone Parents

We welcome the acknowledgement that childcare provision in Northern Ireland is a major consideration. The childcare infrastructure in Northern Ireland required to underpin these proposals is not in place, nor is there a lead Department responsible for developing an integrated childcare strategy to address the lack of childcare provision in Northern Ireland. WCRP support the policy of positively encouraging lone parents into paid work, however the current proposals of

moving all single parents to Job Seekers Allowance or mandatory work-related activities and sanctions will have an adverse impact on lone parents and children. Lone parents face acute barriers to work; this is particularly emphasised in rural areas because there are fewer work opportunities, greater barriers to obtaining employment such as access to transport, childcare, training and education. Harder to reach single parents will be far more at risk of sanctions. The financial hardship of sanctions may increase the financial burdens of many lone parents. Lone parents have the highest risk of poverty among all household types¹. Also there needs to be consideration of a parent of disabled children as it can be very difficult and expensive to find childminders for children with challenging behaviour or access needs. Finding appropriate childcare provision for children with disabilities is particularly difficult in rural areas.

The Abolition of Income Support

WCRP recognise there is merit in the idea of simplifying the system, and moving towards one where access to support is determined by people's needs and not by the benefit they are claiming. Our concerns centre on whether the regimes can be flexible enough to meet the needs of those parents and carers whose family responsibilities significantly limit their availability for work, training or interviews. 26.9% of income support claimants are lone parents; 95.2% of these are women². Income Support also offers a lifeline to women experiencing domestic and sexual violence. Women leaving domestic violence, with their children, would be treated as job seekers, with only a three-month exemption from job seeking. This will serve to discourage victims from leaving an abusive partner or to return to the situation as they are financially vulnerable.

¹ Bare Necessities – Poverty and Social Exclusion in NI', Democratic Dialogue, 2003

² Women in Northern Ireland' DETI, September 2008

Sanctions

We welcome that the Work for You Benefit Programme will only be considered in NI following a pilot exercise in Great Britain. We feel that 'Work-related activities' through Employment and Support Allowance may have a disproportionate affect on people with mental health problems and those with childcare and caring responsibilities (mainly women). Participating in mandatory work related programmes is likely to have substantial adverse implications for claimants and their dependants. WCRP advocate that such schemes should be on a voluntary basis. 'Work for your benefits' will negatively impact on parents' time with their children, decrease quality time with their children, without increasing their financial situation. The national minimum wage should be paid to anyone undertaking work through 'work for your benefit', rather than the £1.73 implied by the proposal. Such schemes need to take into consideration the impact this will have on families. International research has found that there is little evidence that such schemes increase the chances of individuals finding work, particularly when there is little demand for labour. The same research found it was least effective for those with low skills and those with multiple barriers to employment³.

Personal advisors

Personal Advisors would have the power to determine appropriate sanctions. Whilst the Bill proposes this will be agreed with the claimant, ultimately power rests with the Advisor. This unequal power structure presents opportunities for discrimination. We would like details on what safeguards will be in place to ensure that this does not happen. A consistent, transparent approach is required. There is no detail on how this will be achieved.

³ Richard Crisp and Del Roy Fletcher (2008) *A comparative review of workfare programmes in the United States, Canada and Australia* DWP Research Report No. 533.

Expectations about Welfare Reform in Rural Areas

There is no recognition that vulnerability may be greater in rural areas because there are fewer work opportunities, greater barriers to obtaining employment, and fewer options available to replace welfare. The rural poor are more geographically dispersed than their urban counterparts, making it more difficult for rural residents to access social services that can assist them in finding work or support needed to remain employed. Social service agencies are located in urban environments that can be difficult for clients in rural areas to access. Evidence already points to the lack of rural dwellers accessing their right to entitlements. The proposals will further discourage those living in poverty in rural areas, from doing so.

Conclusion

The Government should also consider its obligations under Articles 2, Article 11, Article 13 and Article 14 of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)⁴ “to pursue by all appropriate means and without delay a policy of eliminating discrimination against women”. We would advocate that the points raised in our response, are given due consideration and reflected in the necessary amendments to ensure that women are not adversely impacted by the proposals outlined. WCRP would welcome the opportunity to discuss in more detail the points outlined.

⁴ UN Convention on the Elimination of All Forms of Discrimination (CEDAW)
<http://www.un.org/womenwatch/daw/cedaw/text/econvention.htm>