



Response to The Executive Office's Spending Plans for 2023 – 24 Equality Impact Assessment

**Children's Law Centre
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1. Introduction

1.1 The Children's Law Centre (CLC) is an independent charitable organisation which works towards a society where all children can participate, are valued, have their rights respected and guaranteed without discrimination and where every child can achieve their full potential.

1.2 We offer training and research on children's rights, we make submissions on law, policy and practice affecting children and young people and we run a free legal advice, information and representation service. We have a dedicated free phone legal advice line for children and young people and their parents and carers called CHALKY as well as a Live Chat service for young people through an online Chatbot, REE Rights Responder and a youth advisory group called Youth@clc. Within our policy, legal, advice and representation services we deal with a range of issues in relation to children and the law, including the law with regard to some of our most vulnerable children and young people, such as looked after children, children who come into conflict with the law, children with special educational needs, children living in poverty, children with disabilities, children with mental health needs and complex physical health needs and children and young people from ethnic minority backgrounds.

1.3 Our organisation is founded on the principles enshrined in the United Nations Convention on the Rights of the Child (UNCRC), in particular:

- Children shall not be discriminated against and shall have equal access to protection.
- All decisions taken which affect children's lives should be taken in the child's best interests.
- Children have the right to have their voices heard in all matters concerning them.

1.4 Without prejudice, from its perspective as a children's rights organisation with many years' experience working with and on behalf of children and young people, CLC is grateful for the opportunity to make a submission to The Executive Office on their Spending Plans for 2023 – 24.

2. Consultation

2.1 Central to compliance with the statutory duties imposed under section 75 is the concept of increased participation in policy making and development. The Equality Commission's guidance¹ states that consultation must be meaningful

¹ 'Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities' Equality Commission for Northern Ireland, April 2010, p.14

and inclusive, in that all persons likely to be affected by a policy should have the opportunity to engage with the public authority. It also states that targeting consultation at those most affected by particular policies is also beneficial, in terms of identifying any adverse impact of policies or proposed policies at the earliest possible stage.²

2.2 The Department's approved Equality Scheme also recognises the importance of consultation in all aspects of the implementation of the Department's statutory equality duties³ and makes a commitment to carry out full, meaningful and open and inclusive consultation in line with Equality Commission's Guiding Principles with individuals of the section 75 categories⁴ and to taking into account any relevant equality impact assessment and the outcome of associated consultation in making decisions on current or proposed policies.

2.3 Despite the Department's commitment in its approved Equality Scheme to carry out direct consultation with those likely to be affected by a policy, we are unaware of any direct consultation being carried out by The Executive Office with children and young people on its Spending Plans for 2023 - 24 Equality Impact Assessment. **CLC would therefore welcome details of any direct consultation with children and young people that The Executive Office has carried out, or intends to carry out on the Spending Plans 2023 – 24 Equality Impact Assessment, including details and copies of any child accessible versions of the Spending Plans 2023 – 24 Equality Impact Assessment which have or will be made available.** These proposals directly affect children and young people on whom they differentially adversely impact and so children and young people must be consulted in relation to them. Failure to consult with children and young people is a breach of section 75 of the NI Act, Article 12 of the UNCRC and The Executive Office's Equality Scheme.

2.4 The Equality Commission's Guidance for Public Authorities on implementing Section 75 of the Northern Ireland Act 1998 states that in conducting consultations, the accessibility of language and the format of information should be considered to ensure that there are no barriers to the consultation process, with information being made available on request in accessible formats. Systems should be put in place so that information can be made available in accessible formats in a timely fashion. In addition, they recommend that specific consideration is given to how best to communicate information to children and young people, people with learning disabilities, and minority ethnic

² Ibid p. 38 and 39

³ TEO Equality Scheme para 3.1 <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/teo-equality-scheme-2017.pdf>

⁴ Ibid para 3.2

communities.⁵ The Equality Commission’s guidance for consulting with children and young people, “Let’s Talk, Let’s Listen”⁶ reminds Government that children and young people have particular needs concerning information and that actions should be taken by Government to facilitate young people to take part in consultation and decision-making processes, especially on issues that affect them. It emphasises the particular importance of considering which methods are most appropriate for consulting children and young people. Public authorities should also make sure to provide information that is clear, easy to understand and in an appropriate format, to ensure there are no problems preventing effective consultation with children and young people.⁷

2.5 Furthermore, The Executive Office’s own Equality Scheme makes the following commitment:

“We will consider the accessibility and format of every method of consultation we use in order to remove barriers to the consultation process. Specific consideration will be given as to how best to communicate with children and young people, people with disabilities (in particular people with learning disabilities) and minority ethnic communities. We take account of existing and developing good practice, including the Equality Commission’s guidance Let’s Talk Let’s Listen – Guidance for public authorities on consulting and involving children and young people (2008).”⁸

2.6 It is incumbent upon us to raise the timeframe for responses to the consultation. Respondents have been given from 11th May 2023 to 2nd August 2023, which *prima facie* presents a consultation period of 12 weeks. However, The Executive Office encouraged respondents to respond by 7th June 2023 i.e. a consultation period of 4 weeks.

2.7 The Executive Office’s approved Equality Scheme states that:

“The consultation period for equality issues will normally last for twelve weeks to allow adequate time for groups to consult amongst themselves as part of the process of forming a view. However, in exceptional circumstances when this timescale is not feasible (for example implementing EU Directives or UK wide legislation, meeting Health and Safety requirements, addressing urgent public health matters or

⁵ Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities’ Equality Commission for Northern Ireland, April 2010, p.14

⁶ ‘Let’s Talk, Let’s Listen: Guidance for public authorities on consulting and involving children and young people’. Equality Commission for NI, May 2008.

⁷ Ibid para 2.26

⁸ TEO Equality Scheme para 3.6 <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/teo-equality-scheme-2017.pdf>

complying with Court judgments), we may shorten timescales to eight weeks or less before the policy is implemented. We may continue consultation thereafter and will review the policy as part of our monitoring commitments. Where, under these exceptional circumstances, we must implement a policy immediately, as it is beyond our control, we may consult after implementation of the policy, in order to ensure that any impacts of the policy are considered.”⁹

2.8 As this consultation does not engage any of the exemptions which allow for a reduced consultation period, the required 12 weeks consultation period should have been adhered to, particularly as some of the consultation period covered the July holiday period:

“If a consultation exercise is to take place over a period when consultees are less able to respond, for example, over the summer or Christmas break, or if the policy under consideration is particularly complex, we will give consideration to the feasibility of allowing a longer period for the consultation.”¹⁰

2.9 Further, by encouraging respondents to reply by 7th June and using replies from those responding on or before the 7th June to inform immediate budgetary positions, TEO are in fact shortening their consultation period and therefore in clear breach of their own Equality Scheme. In addition to this, by only allowing 4 weeks to respond, this will inevitably exclude those that need additional time to respond, including many that will be most impacted by these budgetary decisions.

2.10 It is our understanding that the initial phase of data gathering for the 2023 – 24 Budget was commissioned on 20 December 2022, asking Northern Ireland departments to provide returns to the Northern Ireland Office (via the Department of Finance) by 27 January 2023. It is also our understanding that following this phase of initial budget preparations the Department of Finance wrote to other departments on 6 February 2023 requesting information on the implications of different scenarios involving potential budget reductions of between 0% and 15% respectively. In addition to this, indicative budget totals for each Northern Ireland department were made available from the Northern Ireland Office on 4 April 2023, over three weeks before the final overall budget was then announced in the Secretary of State’s Written Ministerial Statement¹¹ on 27 April 2023.

⁹ <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/teo-equality-scheme-2017.pdf> para 3.11

¹⁰ Ibid para 3.12

¹¹ NI Finances 2023-24, Statement made on 27 April 2023. Available at: <https://questions-statements.parliament.uk/written-statements/detail/2023-04-27/hcws748>

2.11 We therefore request clarification from TEO about when screening in relation to budget preparations has actually taken place; if screening has taken place more than once; if an Equality Impact Assessment and subsequent consultation was considered earlier in the process than it actually occurred (and if it was considered earlier, why it did not take place). We ask these questions because within the timeline set out above it is clear that the scope of the policy (i.e. TEO's budget) was becoming clearer and that even in the earliest stages of the process there was an understanding within NICS of the parameters of that policy and the potential cuts that TEO and other departments were being asked to consider.

2.12 In that context we would also remind TEO that the Equality Commission's guidance on acting in adherence with Section 75 duties at the earliest possible opportunity is both explicit and unequivocal, for example:

"[Screening] should be completed at the earliest opportunity in the policy development process. For more detailed strategies or policies that are to be put in place, through a series of stages, a public authority should then consider screening at various times during implementation."

Screening is more useful if it is introduced at an early stage when developing or reviewing a policy, or during successive stages of implementation....To undertake screening after policy proposals have been developed may be inefficient in terms of time and may be ineffective if policy makers are reticent to make changes at a later stage.¹²

2.13 This guidance is also reflected in The Executive Office's own Equality Scheme which commits to screening being completed, "at the earliest opportunity"¹³ and consultation with stakeholders beginning, "as early as possible".¹⁴

¹² Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities' Equality Commission for Northern Ireland, April 2010, Annex 1 - Screening

¹³ TEO Equality Scheme, Para 4.5: <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/teo-equality-scheme-2017.pdf>

¹⁴ TEO Equality Scheme, Para 3.5: <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/teo-equality-scheme-2017.pdf>

3. Consideration of Available Data

3.1 The Equality Commission's guidance for public authorities on carrying out an Equality Impact Assessment¹⁵ outlines what should be considered at this stage of the EQIA:

- *Collect and analyse existing quantitative data by relevant equality category as a minimum base from which to judge outcomes;*
- *Use qualitative or evaluative research or information gathered by government and bodies such as voluntary, community and trade union organisations;*
- *Identify gaps in available information for equality categories and where more detailed data are needed take steps in order to have the optimum information on which to consult and base subsequent decisions;*
- *If necessary, commission new data (qualitative or quantitative). As outlined above co-operation within and between sectors should be considered; and*
- *Relevant, reliable and up-to-date information is essential. Statistics alone do not provide reasons or explanations for differences. Public authorities must therefore institute a system of information gathering across all nine equality categories to supplement available statistical and qualitative research. While the collection of relevant data is important, public authorities must be aware that particular issues of sensitivity and confidentiality may arise in relation to disability, sexual orientation and political opinion. Public bodies must recognise the particular benefit of discussion and information gathering with groups representing people with disabilities and of different sexual orientations, in the absence of extensive data on these matters, among their employees and recipients of services. Annex 1, para. 2.1”.*

3.2 The Executive Office's Equality Scheme commits to “*carry out the EQIA in accordance with Equality Commission guidance. The equality impact assessment will be carried out as part of the policy development process, before the policy is implemented.*”¹⁶ A failure to properly collect and analyse data as part of the EQIA process is therefore a breach of the Department's own Equality Scheme.

3.3 A wide range of sources of data are listed in The Executive Office's consultation document, including but not limited to the 2021 Census, NISRA statistics, Crisis Fund data and the T:BUC headline actions data. There is a limited attempt by

¹⁵[https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance\(2005\).pdf](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance(2005).pdf)

¹⁶ TEO Equality Scheme para 4.17

TEO to analyse the data sources, as is outlined in the Equality Commission guidance quoted above.

- 3.4 Further detail and analysis is required within the consultation document to outline what data from the sources listed has been used, and how this has been used to assess any differential impact across all of the s75 categories. CLC would assert that this section of the EQIA document is incomplete and therefore needs to be rewritten, with meaningful consideration and assessment of the impacts on all s75 groupings outlined. A full and proper assessment of impact is required on each policy proposal, alongside an assessment of the cumulative impact of the budget proposals as a whole.

4. Analysis of Impacts

- 4.1 TEO has identified that the Spending Plans may have a differential negative impact on a number of section 75 categories, including on the basis of age. This is illustrated in relation to the Central Good Relations Fund, the Planned Intervention Programme, the District Council Good Relations Programme, the T:BUC Camps Programme and the T:BUC Ambassadors Programme in relation to Core Department funding.
- 4.2 In relation to the analysis of impacts for Arm's-Length Bodies and the 10% reduction in budget allocations model, it has been identified that people with disabilities, people from a range of ethnic minority groups, including newcomers, children, LGBT people and others will be differentially and more negatively impacted by cuts, for example, to the Equality Commission budget. The consultation document further outlines adverse impact in relation to some of the other ALBs (but not all listed) and children and young people will inevitably be impacted by a reduction in funding to other ALBs but this has not been outlined or analysed.
- 4.3 There is no further detail or assessment offered on how this budget will impact upon children, including children with multiple identities, for example, a young asylum seeker with a disability. It is CLC's clear view that this EQIA is therefore far from complete. We would also assert that it is clear that there will be direct differential adverse impact on children and young people as a result a range of policy proposals within this Spending Plans. Further information, including disaggregated data and a meaningful assessment of how this will impact on children and young people is required in order to ensure compliance with s75 and The Executive Office's Equality Scheme.
- 4.4 It is therefore CLC's view that in its current form, the Department's EQIA is not only incomplete but also fundamentally flawed. It is also our view that the Department is in clear breach of its own Equality Scheme commitments by

making an equality assessment decision without using disaggregated data, including independent disaggregated data.

4.5 The Executive Office's Equality Scheme outlines the following in relation to an EQIA:

“An Equality Impact Assessment (EQIA) is a thorough and systematic analysis of a policy, whether that policy is formal or informal, and irrespective of the scope of that policy. The primary function of an EQIA is to determine the extent of any impact of a policy upon the Section 75 categories and to determine if the impact is an adverse one. It is also an opportunity to demonstrate the likely positive outcomes of a policy and to seek ways to more effectively promote equality of opportunity and good relations.”¹⁷

4.6 The EQIA presented by The Executive Office is neither thorough nor systematic in its analysis of the policy here, nor does it properly determine the extent of impact of the policy upon s75 categories. It is not sufficient to say that some groups are more likely to be impacted. Again, further information, outlining the impact of each policy decision, as well as an assessment of the cumulative impact of this budget on all s75 categories, including children with multiple identities is required, alongside the identification of measures to mitigate adverse impact, in order for TEO to be compliant with their own Equality Scheme and their statutory duties under s75 of the NI Act 1998.

5. Consideration of Mitigations

5.1 The Equality Commission's Practical Guidance on Equality Impact Assessment states that:

“The consideration of mitigating measures and alternative policies is at the heart of the EQIA process. Different options must be developed which reflect different ways of delivering the policy aims. The consideration of mitigation of adverse impacts is intertwined with the consideration of alternative policies. Mitigation can take the form of lessening the severity of the adverse impact. Annex 1, para. 4.1

Ways of delivering policy aims which have a less adverse effect on the relevant equality category, or which better promote equality of opportunity for the relevant equality category, must in particular be considered. Consideration must be given to whether separate implementation strategies are necessary for the policy to be effective for the relevant group. The following must be considered:

- *How does each option further or hinder equality of opportunity?*

¹⁷ <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/teo-equality-scheme-2017.pdf> para 4.16

- *How does each option reinforce or challenge stereotypes which constitute or influence equality of opportunity?*
- *What are the consequences for the group concerned and for the public authority of not adopting an option more favourable to equality of opportunity?*
- *How will the relevant representative groups be advised of the new or changed policy or service?*
- *If an economic appraisal is necessary – What are the costs of implementing each option? Will the social and economic benefits to the relevant group of implementing the option outweigh the costs to the public authority or other groups?*
- *Does the public authority have international obligations which would be breached by, or could be furthered by, each of the options? Annex 1, para. 4.2 Clear evidence of the consideration of the impacts of alternatives must be apparent in the relevant consultation documentation. Annex 1, para 4.3.¹⁸*

5.2 Furthermore, The Executive Office’s Equality Scheme states that an EQIA will include:

- *Consideration given to measures which might mitigate any adverse impact;*
- *Consideration given to alternative policies which might better achieve the promotion of equality of opportunity.¹⁹*

5.3 The Executive Office’s EQIA on Spending Plans for 2023 – 24 makes no attempt to consider alternative options that would reflect a different way of delivering the policy aims, nor does it outline any tangible mitigations to mitigate against the differential adverse impact that is clearly evident.

5.4 The EQIA outlines ‘potential’ areas for mitigation, such as “*seeking to protect the most vulnerable people with whom TEO works...*”, but does not provide any information, detail or action in terms of how this will be achieved. Further actions include language such as “*where possible*” and “*having regard*”. This is not a sufficient approach to completing an EQIA and as such, should be reconsidered by TEO in order to ensure that statutory equality duties are fulfilled.

¹⁸ Equality Commission’s Practical Guidance on EQIA (page 30)
[https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance\(2005\).pdf](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance(2005).pdf)

¹⁹ TEO Equality Scheme para 4.22

5.5 Since the Executive Office has not put forward any alternative options to reflect a different way to deliver the policy aims, or outlined and assessed any tangible mitigations, it cannot be asserted that potential adverse impacts cannot be mitigated.

5.6 Furthermore, Section 75 of the Northern Ireland Act 1998 requires more than avoidance of adverse impact, it also requires a proactive approach to be taken by designated public bodies to ensure the promotion of equality of opportunity. The Equality Commission's Guidance for public authorities in relation to section 75 states that:

“The promotion of equality of opportunity entails more than the elimination of discrimination. It requires proactive measures to be taken to facilitate the promotion of equality of opportunity between the categories identified in Section 75 (1). The equality duty should not deter a public authority from taking action to address disadvantage among particular sections of society – indeed such action may be an appropriate response to addressing inequalities.”²⁰

5.7 The Executive Office's Equality Scheme also outlines that:

“TEO uses the tools of screening and equality impact assessment to assess the likely impact of a policy on the promotion of equality of opportunity and good relations. In carrying out these assessments we will relate them to the intended outcomes of the policy in question and will also follow Equality Commission guidance...”²¹

5.8 Designated public bodies are therefore required to not only ensure that there are no adverse impacts suffered by members of any of the section 75 categories as a result of the proposed legislation, policy or practice, but also to have due regard to the need to promote equality of opportunity among members of the nine groups. This means that there is a statutory obligation on the Department as a designated public authority for the purposes of section 75 of the Northern Ireland Act 1998 to act to mitigate adverse impact or inequality as well as to proactively promote equality of opportunity in order to comply with section 75 of the Northern Ireland Act 1998. The mitigating actions outlined in the EQIA document are a misnomer, as no tangible mitigating actions have been identified or assessed. Therefore, this section is deeply flawed as evidence of the Department's compliance with their equality duty vis-à-vis mitigating adverse impact and proactively promoting equality of opportunity.

6. Multiple identity

²⁰ Equality Commission's Guidance for public authorities in relation to section 75
<https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/S75GuideforPublicAuthoritiesApril2010.pdf>

²¹ <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/teo-equality-scheme-2017.pdf> para 4.3

6.1 The EQIA makes no attempt at considering any data to assess the impacts of the Spending Plans 2023 - 24 on people with multiple identities. Consideration must be given at this stage to the impacts this policy has on section 75 groups, and on those with multiple identities across the section 75 groups. The Council of Europe outlines:

“People might be discriminated against because of one or more characteristics that are part of, or are perceived as part of their identity. People have multiple layers to their identity and may define themselves, or be defined by others, according to various criteria, including gender, sex, sexual orientation, nationality, ethnicity, social status, disability, religion and so on.

*The **concept of multiple discrimination** recognises that discrimination can occur on the basis of more than one perceived characteristic. For example, a person who is discriminated on the grounds of their ethnicity may be also discrimination on the grounds of gender, sexual orientation, age, and so on. Such discrimination can, and often does, create **cumulative disadvantage**.”²²*

It is therefore crucial that this EQIA assesses the differential adverse impact of children with more than one identity, as per the groups outlined in s75 of the NI Act 1998.

6.2 It is our plain view that the Equality Impact Assessment produced and published by TEO meets neither the spirit nor letter of the Equality Commission’s guidance on the function and purpose of the EQIA process and so we must conclude that TEO have breached both their duties under section 75 of the Northern Ireland Act 1998 and their own Equality Scheme.

7. Monitoring

7.1 There is a real lack of detail in the published document in relation to how differential adverse impact will be monitored by TEO. It is CLC’s view that this is a serious omission, particularly given that The Executive Office’s own Equality Scheme states that:

“We monitor any adverse impact on the promotion of equality of opportunity of policies we have adopted. We are also committed to monitoring more broadly to identify opportunities to better promote equality of opportunity and good relations in line with Equality Commission guidance.”²³

²² <https://www.coe.int/en/web/gender-matters/intersectionality-and-multiple-discrimination>

²³ TEO Equality Scheme para 4.27

7.2 The Department's EQIA should therefore outline how differential adverse impact will be monitored and the details of the systems that are in place to do so. There is a legitimate expectation that the Department would set this out in clear detail through the EQIA and so to omit this from the consultation document is at a minimum, a breach of TEO's own Equality Scheme.

8. Child Rights Impact Assessment

8.1 Whilst we welcome TEO's willingness to undertake a Child Rights Impact Assessment, CLC are extremely disappointed in the contents of the document. There is no attempt to assess the impact of the Spending Plans on children's rights, there is merely a rehash of some of the information in the EQIA and the outcomes report for Phase 1 of the consultation process.

8.2 NICCY's guidance on undertaking Child Rights Impact Assessments (CRIA)²⁴ outlines that:

"A child rights focused impact assessment supports the systematic assessment and communication of the impact of a proposal or measure on the rights, needs and interests of children and young people.... Child Rights Impact Assessment (CRIA) examines the potential impacts on children and young people of laws, policies, budget decisions, programmes and services as they are being developed and, if necessary, suggests ways to avoid or mitigate any negative impacts. This is done prior to the decision or action being set in place. They focus on how children's rights may be affected by the decisions and actions of governments, institutions and others in the areas of law, policy and practice. Impacts are measured against the rights set out in the UNCRC, its Optional Protocols, and other international human rights treaties".

8.3 The Child Rights Impact Assessment provided by The Executive Office does not examine the potential impacts on children and young people, measured against the rights set out in the UNCRC and therefore the CRIA provided by TEO needs to be readdressed to ensure that it is undertaken properly.

8.4 The CRIA provided outlines that all stakeholders will have the opportunity to engage through the publicly available consultations on the TEO website. As outlined in paragraph 2.3 of this response, CLC would welcome details of any direct consultation with children and young people that The Executive Office has carried out, or intends to carry out on the Spending Plans 2023 – 24 Equality Impact Assessment, including details and copies of any child

²⁴ <https://www.niccy.org/what-we-do/training/cria/>

accessible versions of the Spending Plans 2023 – 24 Equality Impact Assessment which have or will be made available.

8.5 CLC would draw TEO's attention to the Concluding Observations²⁵ published by the UN Committee on the Rights of the Child on 2nd June 2023. The UN Committee on the Rights of the Child have put forward the following recommendations in relation to budgeting:

The Committee recommends that the State party incorporate a child rights-based approach into the State budgeting process in all jurisdictions of the State party, the Overseas Territories and Crown Dependencies, and:

- (a) Implement a tracking system for the allocation, use and monitoring of resources for children, with a view to eliminating disparities and ensuring equitability, and assess how investments in all sectors serve the best interests of children;*
- (b) Introduce budgetary allocations for children in disadvantaged situations and ensure that children are not affected by austerity measures;*
- (c) Ensure that, in situations of economic crisis, regressive measures are not taken without the requirements stated in paragraph 31 of general comment No. 19 on public budgeting for the realization of children's rights, including that children participate in the decision-making process related to such measures;*
- (d) Withdraw the 2023/24 budget for Northern Ireland and fully consider the equality and human rights implications of a new budget, taking all possible steps to mitigate any adverse impact on children's rights before issuing a revised budget;*
- (e) Ensure transparent and participatory budgeting in which civil society, the public and children can participate effectively.*

9. Conclusion

9.1 CLC understand and appreciate the difficult situation currently facing NICS departments with the financial position for public services in Northern Ireland. Notwithstanding the challenging environment the Department's equality duty persists and must be fully and properly discharged and central to the decision-

²⁵ CRC/C/GBR/CO/6-7 Accessible at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FCO%2FGBR%2FCO%2F6-7&Lang=en

making process, in order to protect the most vulnerable in our society. CLC is grateful for the opportunity to respond to this consultation and we hope that our comments have been constructive and useful. We look forward to receiving the requested information by return.