



Commissioner for Older People  
for Northern Ireland

12 August 2024

Financial Management Directorate,  
Department for Communities,  
Level 5, Causeway Exchange,  
1-7 Bedford Street,  
Belfast,  
BT2 7EG.

**By email: [dfcbudgeteqia@communities-ni.gov.uk](mailto:dfcbudgeteqia@communities-ni.gov.uk)**

Dear Sir/Madam,

**Re: Consultation on Department for Communities' Budget 2024-25 Allowances**

I am writing in response to the Department for Communities' (DfC) call for views on the budget allocation for 2024/25. I welcome the opportunity to engage with this consultation and communicate how the Department's proposed budgetary decisions would disproportionately impact older people in Northern Ireland.

By way of preliminary remarks, COPNI is deeply disappointed by the quality of the Equality Impact Assessment (EQIA). The Department states that the primary function of an EQIA is "to assess whether policy proposals would have a differential impact and in particular, an adverse differential impact on the categories of persons listed in Section 75, and any sub-groups within those categories".<sup>1</sup> COPNI found that a thorough assessment of the impacts of the budget allocation on older people was lacking throughout the EQIA.

As an example, data sources utilised in the Department's discussions of the likely impact of budget decisions on 'age' as a Section 75 category predominantly focused on younger age categories and there was limited analysis of the impacts for older people. For instance, page 28 of the EQIA assesses the impacts of cuts to staffing in social security benefit and pension delivery for people of different ages.<sup>2</sup> Of the five sources used, none examined the impacts of a reduced benefit and pension delivery

---

<sup>1</sup> Department for Communities (2024) *Budget 2024-25 Equality Impact Assessment*, p 8. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-egia.pdf>

<sup>2</sup> Department for Communities (2024) *Budget 2024-25 Equality Impact Assessment*, p 28. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-egia.pdf>

service for older people, their increased risk of experiencing financial hardship or poverty. Moreover, while page 22 and 23 of the EQIA set out the data sources the Department relied upon when understanding the impacts of their budget<sup>3</sup>, many of the sources referenced in the section 'Assessment of Impacts' were not statutory sources, thereby hindering a proper analysis of impacts.

The aggregation of Section 75 categories when assessing the impacts of cuts, for example, to the Supporting People Programme<sup>4</sup>, is inadequate and ineffective. By failing to acknowledge the distinctiveness of each of the Section 75 categories, proper assessment of the potential damage of proposals is incomplete. Continuing with the example of the Supporting People Programme, it is fundamental to the quality of life of many older people in Northern Ireland and the DfC's lack of consideration of the adverse impact that older people in particular will experience from this cut is unacceptable. The lack of distinct assessment across the Section 75 categories fails to recognise the distinctive socio-economic situation of different sections of our society and, consequently, fails to acknowledge the different impacts the proposals will have on these different sections of society.

In summary, an EQIA is vital to understanding the potential damage that could be caused by a public body's approach. The Department clearly recognises their duty to have "due regard...to the needs and concerns of all Section 75 groups".<sup>5</sup> However, this EQIA presents an incomplete assessment of the adverse impacts older people in Northern Ireland will face should the proposals be implemented. The Supporting People programme, for example, is vital to the quality of lives of those subject to it, and cuts in this programme, in particular, will have an adverse impact on some of the most vulnerable older people in Northern Ireland.

In relation to some of the specific budgetary decisions and cuts to programmes, COPNI offers the following comments:

---

<sup>3</sup> Department for Communities (2024) *Budget 2024-25 Equality Impact Assessment*, p 22 & 23. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-egia.pdf>

<sup>4</sup> Department for Communities (2024) *Budget 2024-25 Equality Impact Assessment*, p 54. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-egia.pdf>

<sup>5</sup> Department for Communities (2024) *Budget 2024-25 Equality Impact Assessment*, p 24. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-egia.pdf>

### Planning for the ageing population

Northern Ireland's population is set to age at a faster rate than the rest of the UK.<sup>6</sup> Census statistics for 2021 revealed there were 326,500 older people aged 65 and above in Northern Ireland.<sup>7</sup> By 2044, those aged 65 and above are projected to increase to 477,299 people<sup>8</sup>, a 46% increase. In summary, our society is one in which more and more of its constituents are older citizens, which in turn requires a change in public service provision.

COPNI recognises the financial constraints on the DfC and agrees that “the continuation of single-year budgeting...does not support the much-needed strategic planning, investment and public sector reform”.<sup>9</sup> However, demographic ageing and its consequences require proper planning now. Increasing numbers of older people means an increasing need for services that, under this budget, are not being met. As the population continues to age, demand for such services will increase and, consequently, increased needs will be unmet.

COPNI also recognises that responsibility for the inadequacy of the Department's budget, as a whole, lies outside the DfC. Evidently, the budget allocated to the Department inhibits the part it can play in planning for, and addressing the needs of, an ageing population. Regardless, COPNI does not accept that the contemplated budgetary cuts should fall disproportionately on vulnerable sections of our community, including older people, who already face a host of inequalities.

---

<sup>6</sup> Northern Ireland Statistics and Research Agency (2022) *2020-Based Population Projections: Principle Projection, single year of age, 5 year age bands*. Available at: <https://www.nisra.gov.uk/publications/2020-based-interim-population-projections-northern-ireland>

<sup>7</sup> Census 2021 (2022) *Population and Household Estimates, Table PS-11a*. Available at: <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.nisra.gov.uk%2Fsystem%2Ffiles%2Fstatistics%2Fcensus-2021-population-and-household-estimates-for-northern-ireland-tables-24-may-2022.xlsx&wdOrigin=BROWSELINK>

<sup>8</sup> Northern Ireland Statistics and Research Agency (2022) *2020-Based Population Projections: Principle Projection, single year of age, 5 year age bands*. Available at: <https://www.nisra.gov.uk/publications/2020-based-interim-population-projections-northern-ireland>

<sup>9</sup> Department for Communities (2024) *Budget 2024-25 Equality Impact Assessment*, p 3. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-egia.pdf>

### Affordable Warmth Scheme

COPNI opposes cuts to the Affordable Warmth Scheme. The consultation document highlights how the allocation of £2.0m to the Scheme will “reflect only 50% of the total budget allocated in 2023-24”.<sup>10</sup>

Older people in Northern Ireland are more likely than other age groups to experience fuel poverty. As fuel poverty is seen to increase with age, it will be an increasing problem as Northern Ireland’s population continues to age.<sup>11</sup> Such a drastic cut to the Affordable Warmth Scheme would represent an unfair burden on older people, many of whom undoubtedly rely on the Scheme. Some older people in Northern Ireland make decisions on whether to eat or heat their homes, and the impacts of such cuts affecting health and well-being are significant and disproportionate.

### Social Housing

COPNI recognises the budgetary restrictions in relation to social housing are a “direct result of the significant reduction in the Capital funding allocated to the Department for 2024-25”<sup>12</sup>, especially so because it represents a 38.3% decrease when compared to 2023/24. The decision, however, to allocate £15.0m to building new social homes represents a drastic reduction when compared to 2023/24. The consultation document states: “budget allocations will currently only support up to 400 unit new starts in 2024-25. This compares to 1,508 unit new starts in 2023-24”.<sup>13</sup> This is also reliant on funding the Department is “hopeful” of receiving.<sup>14</sup>

COPNI is concerned by this budgetary approach as social housing need is far outweighing supply. At March 2024, there were 47,312 applicants on the social

---

<sup>10</sup> Department for Communities (2024) *Budget 2024-25 Equality Impact Assessment*, p 70. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-eqia.pdf>

<sup>11</sup> The 2016 House Condition Survey found that 25.2% of householders aged 60 to 74 were in fuel poverty, alongside 37.7% of those aged 75 and above. Northern Ireland Housing Executive (2018) 2016 *Northern Ireland House Condition Survey, Main Data Tables, Table 6.6*. Available at: <https://www.nihe.gov.uk/getattachment/1befe276-90af-440d-a3e1-f30ec1d1acc6/2016-HCS-Main-Data-tables-in-excel-format.xlsx>

<sup>12</sup> Department for Communities (2024) *Budget 2024-25, Equality Impact Assessment*, p 21. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-eqia.pdf>

<sup>13</sup> Department for Communities (2024) *Budget 2024-25, Equality Impact Assessment*, p 70. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-eqia.pdf>

<sup>14</sup> Department for Communities (2024) *Budget 2024-25, Equality Impact Assessment*, p 21. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-eqia.pdf>

housing waiting list<sup>15</sup>. As well as this, the Northern Ireland Housing Executive have reported a five-year projected social housing need of 24,922 (2023-2028).<sup>16</sup> Demand for social housing in Northern Ireland is growing. Despite this, the current budget allocation cannot meet such demand and COPNI agrees that it will have a “significant detrimental effect on the numbers of new social homes that can be built”.<sup>17</sup>

The Northern Ireland Housing Executive provide an indication of the number of older people on the social housing waiting list by local government districts. In Belfast, 10% of people on social housing waiting lists are older people, compared to 20% in Mid and East Antrim, and 17% in Causeway Coast and Glens, for example.<sup>18</sup> As the population continues to age, we can expect the number of older people on the Northern Ireland social housing waiting list to increase. The Northern Ireland Housing Executive’s *Older People’s Housing Strategy 2021/22 – 2026/27* argues that one of the biggest challenges Northern Ireland’s society faces is “ensuring that there is an adequate supply and choice of safe and secure housing”.<sup>19</sup> The Department’s current budgetary approach to social housing, especially for older people, does not address this challenge.

Similarly, the housing requirements of an ageing population present additional challenges that will not be addressed under this budget. Older people often require adaptations to housing to enable them to live independently for as long as possible. Yet, older people are more likely to live with a disability. Census 2021 statistics show that 56.8% of those aged 65 and above in Northern Ireland live with a long-term health problem or disability.<sup>20</sup> Considering these figures, social housing needs to be reflective

---

<sup>15</sup> Northern Ireland Statistics and Research Agency (2024) *Northern Ireland Housing Bulletin, January – March 2024*. Available at: <https://dataavis.nisra.gov.uk/communities/Quarterly-Bulletin-January---March-2024.html>

<sup>16</sup> Northern Ireland Housing Executive, *Commissioning Prospectus, Social & Intermediate Housing Requirements for the period 2024/25 – 2026/27*. Available at: <https://www.nihe.gov.uk/getattachment/054082dd-6321-4ea7-861d-d6785cfa74cd/Commissioning-Prospectus-2024-25-to-2026-27.pdf>

<sup>17</sup> Department for Communities (2024) *Budget 2024-25, Equality Impact Assessment*, p 70. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-eqia.pdf>

<sup>18</sup> Northern Ireland Housing Executive, *Commissioning Prospectus, Social & Intermediate Housing Requirements for the period 2024/25 – 2026/27*. Available at: <https://www.nihe.gov.uk/getattachment/054082dd-6321-4ea7-861d-d6785cfa74cd/Commissioning-Prospectus-2024-25-to-2026-27.pdf>

<sup>19</sup> Northern Ireland Housing Executive, *Older People’s Housing Strategy 2021/22 – 2026/27*, p 7. Available at: <https://www.nihe.gov.uk/getattachment/a314ce42-0a79-4cda-8fd7-5d0808bd8167/older-peoples-housing-strategy.pdf>

<sup>20</sup> Northern Ireland Statistics and Research Agency (2022) *Main statistics for Northern Ireland, Statistical bulletin, Health, disability and unpaid care*, p 18. Available at: <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-2-statistical-bulletin-health-disability-and-unpaid-care.pdf>

of older people's needs, be flexible, adaptable, and accessible to support their ability to continue to live at home.

Reductions in social housing expenditure means waiting lists cannot be addressed, widening the gap between demand and availability, which is especially concerning given the ageing population. Plans for social housing need to take into consideration the needs of the ageing population, recognising accessibility issues, disabilities and restrictions, again something for which this budget does not allow.

### Supporting People

While there is a proposed "6.4% increase in funding...above the 2023-24 Final EQIA Budget position<sup>21</sup>", the Supporting People programme has experienced several budgetary freezes over recent years. Consequently, while COPNI welcomes the rise in funding this financial year, it is unlikely to be sufficient to address demand for services.

In the *Supporting People, Three Year Strategic Plan and Covid-19 Recovery Plan*, the Northern Ireland Housing Executive presented four Strategic Priorities, one of which aims to address the 14% gap between social housing need and supply, prioritising services for older people.<sup>22</sup> From their Strategic Needs Assessment projections, older people were highlighted as having an increased complexity of support needs.<sup>23</sup> The majority of older people in Northern Ireland want to live at home, independently and comfortably, for as long as possible<sup>24</sup>, and the services provided by the Supporting People programme go a long way in helping many older people live independently. However, given the lack of adequate funding for the Supporting People programme and the increasing number of older people in Northern Ireland, older service users will suffer without increased investment.

---

<sup>21</sup> Department for Communities (2024) *Budget 2024-25, Equality Impact Assessment*, p 53. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-eqia.pdf>

<sup>22</sup> Northern Ireland Housing Executive, *Supporting People, Three Year Strategic Plan and Covid-19 Recovery Plan*, p 11. Available at: <https://www.nihe.gov.uk/getattachment/a0e7c160-c22c-4786-b7ee-9299c22b4d44/Supporting-People-Strategic-and-Covid-19-Recovery-Plan-2022-2025.pdf>

<sup>23</sup> Northern Ireland Housing Executive, *Supporting People, Three Year Strategic Plan and Covid-19 Recovery Plan*, p 18. Available at: <https://www.nihe.gov.uk/getattachment/a0e7c160-c22c-4786-b7ee-9299c22b4d44/Supporting-People-Strategic-and-Covid-19-Recovery-Plan-2022-2025.pdf>

<sup>24</sup> AgeNI (2021) *Lived Experience 2021*, p 12. Available at: <https://www.ageuk.org.uk/globalassets/age-ni/media/lived-experience-2021.pdf>

## Pensions and Benefits Delivery

The consultation document sets out the DfC's plans for reductions to staffing in their social security benefits and pensions delivery: "Funding for staff will reduce by a further 95 full time equivalent (fte) posts in 2024-25...This equates to 695 fte critical vacancies, predominantly related to social security benefit and pensions delivery, not being filled. This position reflects a 16% increase on the 600 critical vacancies not filled in 2023-24".<sup>25</sup>

The Commissioner's report, *At the Centre of Government Planning*, illustrates that the cost of state pensions is projected to double over the next 15 years and to continue to rise after 2040.<sup>26</sup> This increase in pension claims and payments risks over-burdening the Department's pension delivery service, with delays in pension and benefit payments likely. COPNI, therefore, agrees and is concerned that "degradation in services is likely and will directly impact upon...older people" in a disproportionate manner. Given the Department is "operating with insufficient staffing levels"<sup>27</sup>, older people are placed at higher risk of experiencing financial vulnerability. This is worrying given that, in 2022/23, 12% of pensioners in Northern Ireland were in relative poverty, and a further 7% of older people were in absolute poverty.<sup>28</sup> The likelihood of delayed pension and benefit payments, due to the Department's inadequate staffing levels, may leave more older people at risk of experiencing poverty in Northern Ireland.

Moreover, older people are also less likely to claim their full entitlements.<sup>29</sup> <sup>30</sup> Age UK note that this may be due to a range of reasons, such as a lack of awareness of what

---

<sup>25</sup> Department for Communities (2024) *Budget 2024-25, Equality Impact Assessment*, p 18. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-egia.pdf>

<sup>26</sup> Commissioner for Older People (2024) *At the centre of government planning, the Programme for Government and preparing for an ageing population*, p 28. Available at: <https://copni.org/assets/general/resources/At-the-Centre-of-Government-Planning-The-Programme-for-Government-and-preparing-for-an-ageing-population.pdf>

<sup>27</sup> Department for Communities (2024) *Budget 2024-25, Equality Impact Assessment*, p 25 & 28. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-egia.pdf>

<sup>28</sup> Northern Ireland Statistics and Research Agency (2024) *Northern Ireland Poverty and Income Inequality Report, 2022/23*. Available at: [https://datavis.nisra.gov.uk/communities/PII\\_report\\_2223.html#](https://datavis.nisra.gov.uk/communities/PII_report_2223.html#)

<sup>29</sup> Rights4Seniors reported that there is an estimated £200 million of benefits for older people in Northern Ireland that go unclaimed each year. Available at: <https://www.rights4seniors.net/content/benefits-0>

<sup>30</sup> 'Make a Call' wraparound service supported 3,104 older people of pension age in Northern Ireland in claiming Attendance Allowance in 2022/23, representing £13.1m of annualised benefits generated. Similarly, 1,715 older people of pension age were supported in claiming Pension Credit in Northern Ireland in 2022/23, representing an additional £0.6m in annualised benefits generated when compared to the previous year. Older people, therefore, need provided with information to promote awareness of the benefits available to them and supported to make a claim. Available at: <https://www.communities-ni.gov.uk/news/ps55-million-additional-benefits-claimed-through-make-call>

is available to them, not having help to make a claim, not knowing how to go about claiming or reluctance to provide personal information.<sup>31</sup> The Department's poor staffing levels will have an impact on "telephony and service delivery performance"<sup>32</sup>, which may further prevent older people from contacting the Department for information on making a claim, which may contribute to older people's risk of financial hardship.

State pension and benefit delivery is vital for many older people to live and participate in society. The current budgetary approach puts this group at further risk of financial vulnerability with all of the wider health and well-being implications of such hardship.

### Conclusion

The Department's proposed budgetary approach will deliver cuts to services relied on by many older people in Northern Ireland. The Department should consider how such decisions will disproportionately impact older people, many of whom are already at an increased risk of experiencing poverty, fuel poverty, and inadequate housing. Such consideration was largely absent in the EQIA.

Similarly, COPNI is dismayed by the lack of mitigations proposed by the Department. As mentioned throughout this consultation response, COPNI recognises the financial constraints on the Department, nonetheless the proposed cuts feel disproportionately severe in impact for older people. The Minister should recognise how the proposed cuts and subsequent lack of mitigation measures undermine the promotion of "equality of opportunity and good relations".<sup>33</sup> The proposed cuts to many of the programmes fundamental to the quality of life of older people will have a disproportionate impact on older people in Northern Ireland. Yet, the Department have offered no mitigations to reduce the adverse effects many older people will undoubtedly face. COPNI urges the Department to reconsider the detrimental impacts this current budgetary approach will have on older people and reexamine the availability of other options and cuts that could limit the adverse impacts on older people.

---

<sup>31</sup> Age UK (2024) *Briefing, Benefit take-up and older people*. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/money-matters/benefit-take-up-briefing-may-2024-.pdf>

<sup>32</sup> Department for Communities (2024) *Budget 2024-25, Equality Impact Assessment*, p 25. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-egia.pdf>

<sup>33</sup> Department for Communities (2024) *Budget 2024-25, Equality Impact Assessment*, p 85. Available at: <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-budget-2024-25-egia.pdf>





Commissioner for **Older People**  
for Northern Ireland

COPNI opposes the aspects of the Department's proposed budget allocation for 2024/25 which disproportionately harm older citizens in Northern Ireland. I would welcome the opportunity to discuss COPNI's response to this consultation should it be necessary or helpful.

Best wishes

A handwritten signature in black ink, appearing to read 'E. Lynch', is placed over a light grey dotted rectangular background.

**Eddie Lynch**

**within the office of Commissioner for Older People for Northern Ireland**