

26 February 2025

Department of Finance,
Clare House,
303 Airport Road,
Belfast,
BT3 9ED.

By email: budgetconsultation@finance-ni.gov.uk

Dear Sir/Madam,

Re: Draft Budget 2025-26 Cumulative Equality Impact Assessment

I am writing on behalf of the office of the Commissioner for Older People for Northern Ireland in relation to the consultation on the Draft Budget 2025-26 Cumulative Equality Impact Assessment.

The present budget and its EQIA represent a continuation of the trajectory of public finances in the past few years and the reduced capacity of public services to meet an increasing demand for services. This trajectory is not likely to revert in the near future.

One of the driving factors of the current challenges to public services and finances is the ageing of our population. In a recently published report (*At the Centre of Government Planning. The Programme for Government and Preparing for an Ageing Population*),¹ COPNI has analysed the challenges that demographic ageing poses to all areas of our welfare model, including the economy, the labour market, health and social care, housing, equality, or transport.

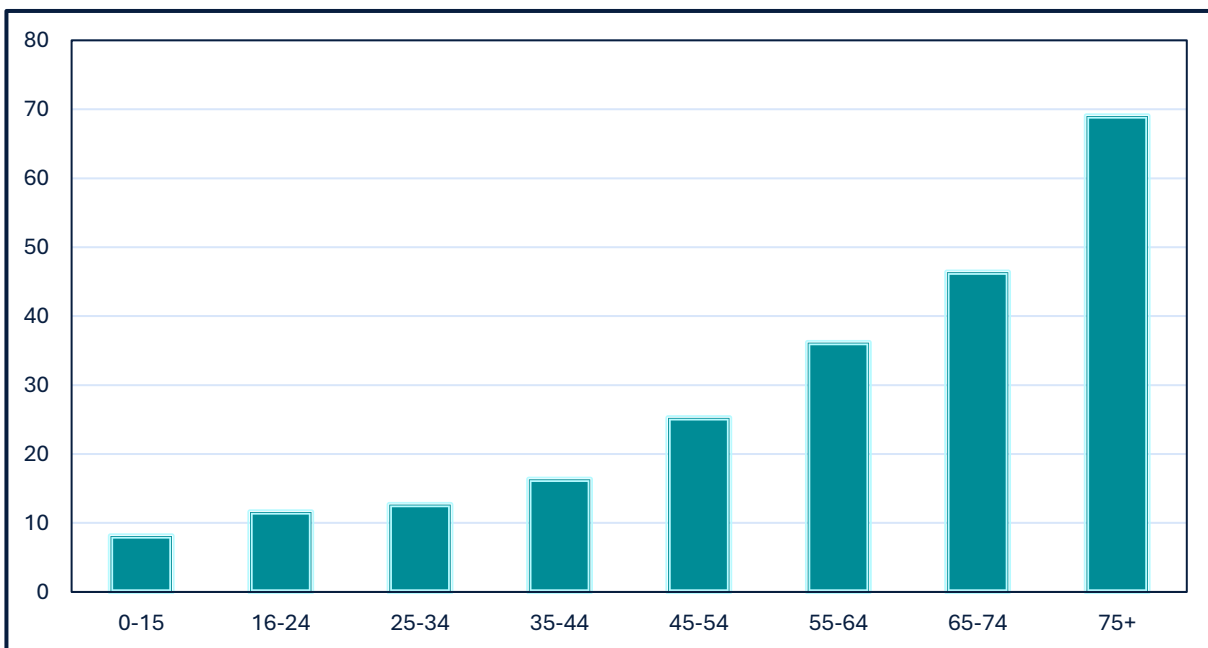
Considering this, COPNI has called for action and planning to face this new demographic reality, which demands profound transformations to our public services. The necessity for such transformation is especially important for older people. As competition for resources increases, older people will be the first ones to suffer the consequences, especially due to the lack of age discrimination legislation in goods, facilities and services in Northern Ireland. The present budget represents a clear example of how the challenges of demographic ageing will affect, primarily, older people.

¹ Commissioner for Older People for Northern Ireland (2024) [At the Centre of Government Planning. The Programme for Government and Preparing for an Ageing Population](#).

Impact on older people

In the present document, it is clear that the fears that this office shared in the above-mentioned report are neither mistaken, nor exaggerated. Age groups (and older people in particular) in this budget are subject to the greatest cumulative impact across all the Section 75 groups.² The only other groups that are subject to comparable impacts are people with disabilities and those who have dependants. Of course, these two groups also intersect with age and any negative impact on them contributes to the cumulative negative impact on our older population.

FIGURE 1. People living with a long-term disability (% by age) in Northern Ireland³



The proportion of people living with a long-term condition that limits their day-to-day activities increases with age. More than 36% of people in the age group between 55 and 64 are living with a long-term disability; this proportion grows to 46.4% for those aged 65-74, and to almost 70% for those aged 75 or more. Therefore, any impact that has been identified in the Budget for this group will contribute to the disproportionate impact on older people.

Similarly, the proportion of people that provide more than 50 hours of care per week also increases with age.⁴ Older people are more likely to provide full time care as a

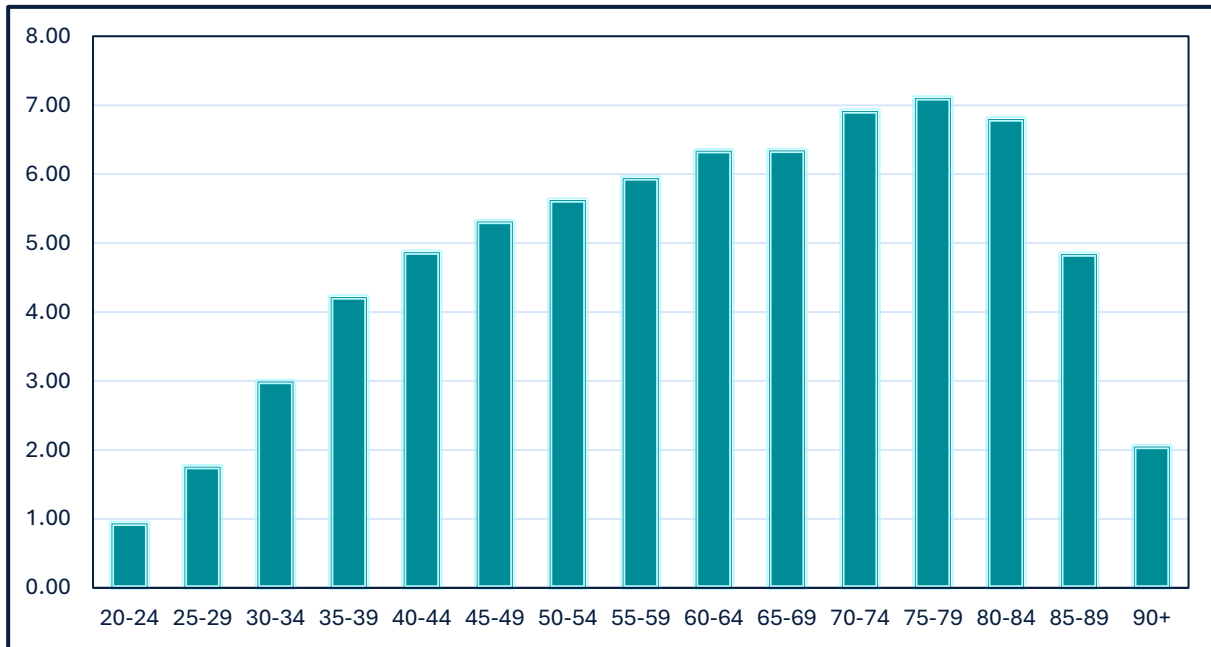
² Department of Finance (2025) [Draft Budget 2025-26. Cumulative Equality Impact Assessment](#); page 5.

³ NISRA Census 2021, [Health Problem or Disability \(Long-term\) - 2 Categories by Age - 8 Categories](#).

⁴ It begins to decrease at the age of 80. See NISRA 2021 Census, [Provision of Unpaid Care - 5 Categories by Age - 19 Categories](#).

proportion of the total population by age group. More than 7% of the population aged between 75-79 provide more than 50 hours of care per week (see Figure 2).

FIGURE 2. % of population that provides more than 50 hours of care per week⁵



These three groups (age, disability and dependants) are the groups most impacted by the Budgets of the different departments, as shown in the present EQIA.⁶ The consultation document reports that the effect of departments’ budgets on age groups include six major impacts and two minor impacts (more than any other groups) followed by people with dependants and people with disabilities (six major impacts and one minor impact). This is due to the fact that these groups are high public service users, particularly in the areas of health and social care.

Moreover, despite the many areas in which the budget will affect older people, there are additional impacts that can be easily identified in other departments and that were not mentioned in the present document. For instance, the present Budget will have an impact on the Department for Communities, and based on its most recent Budget EQIA, this is likely to impact older people. For instance, the DfC assessed in its latest budget that the funding for the Affordable Warmth Scheme was reduced by 50%,⁷ an issue that is likely to affect older people disproportionately, due to the higher prevalence of fuel

⁵ The infographic shows the proportion of people in each age band that provide more than 50 hours of care per week. Source: NISRA 2021 Census, [Provision of Unpaid Care - 5 Categories by Age - 19 Categories](#).

⁶ Department of Finance (2025) [Draft Budget 2025-26. Cumulative Equality Impact Assessment](#); page 5.

⁷ Department for Communities (2024) [Budget 2024-25 Equality Impact Assessment](#).

poverty in older households⁸ and the higher winter mortality of older people.^{9 10} Similarly, the funding restrictions of the DfC has made it impossible to secure reasonable mitigations to the elimination of the Winter Fuel Payment, as the Minister was only able to secure £17 million for mitigations.¹¹ While positive, these mitigations were short of being sufficient, especially considering the increase in electricity bills experienced in the past few years.¹²

Regarding health, this is arguably the main area for concern for COPNI, given that the DoH has reported over the past two Budget EQIAs (24-25 and 25-26) that several service cuts in vital areas will be undertaken by Trusts. All the proposed service cuts affect older people, and some of them affect older people exclusively.¹³ This trend is unlikely to be reverted in next year's budget.

In addition, other areas and aspects that could negatively and disproportionately affect older people might have not been considered. In terms of employability, the inactivity levels of older workers (50-64) remain high (31.5%),¹⁴ and the reasons for this inactivity tend to be related with disability (50.6%) and with providing care (13.5%).¹⁵ Any cuts or shortfalls in economic and skills policies will also affect disproportionately older people, who require further support to remain in employment and are the most vulnerable to changes in the support provided in these areas.

In addition, it is also clear that shortfalls in funding of transport in the DfI will particularly affect older people, as public transport provision remains a central factor for older people to remain active and connected with others.

⁸ The likelihood of experiencing fuel poverty in Northern Ireland increases with age. According to the 2016 House Condition Survey, the proportion of households in fuel poverty was twice as high for older households (33.9%) than for adult households (16.6%) or households with children (15.1%). See Northern Ireland Housing Executive, [House Condition Survey 2016, Main Data Tables \(Excel Format\)](#).

⁹ NISRA [Excess Winter Mortality Tables 2022-23](#)

¹⁰ The NHS states that EWM impacts populations depending on the rate of older people in a given demographic, as these types of deaths affect older people in particular. See [Excess winter deaths - NHS](#).

¹¹ Department for Communities (2024) [Communities Minister announces one-off fuel support payment of £100 for pensioners](#).

¹² According to the statistics of the Department for Energy Security and Net Zero, the average yearly cost of fuel in cash terms in Northern Ireland increased by £410 since 2021 (and £208 in real terms). See Department for Energy Security and Net Zero (2024) [Average annual domestic electricity bills for UK countries](#).

¹³ Department of Health (2025) [Draft Budget 2025-26 - Equality Impact Assessment](#) and Department of Health (2024) [Budget 2024-25 - Equality Impact Assessment](#).

¹⁴ [Annual population survey - regional - labour market status by age](#). Queried data: geography (Northern Ireland), date (September 2024), age (16-24; 25-49; 50-64; 65+), labour market status (economically inactive).

¹⁵ [Annual population survey - regional - economic inactivity by reasons](#). Queried data: geography (Northern Ireland), date (September 2024), age (50-64), reasons for economic inactivity (all).

Conclusion: the need for coordination

The present budget is indicative of the difficulties that are experienced by departments to adapt to the challenges posed by an ageing population. These challenges are increasing due to the rising costs and budget constraints resulting from demographic ageing. This is likely to cause additional difficulties for section 75 groups in the coming years.

If the funding for departments decreases in real terms, this will always have a negative impact and will always result in it affecting several section 75 groups. The capacity of departments to mitigate those effects is proportionate to the available funding, but if budgets decrease further, it is hard to imagine that effective mitigations can be put in place.

When viewed cumulatively, Section 75 groups related to race, age, disability and dependants have the most potential to be adversely impacted by the Draft Budget unless departments take further action to address these areas.¹⁶

The above quote indicates that mitigations and planning are addressed by individual departments. However, when attempting to mitigate these impacts, departments find themselves with difficulties due to funding gaps that grow every year, rendering them incapable of implementing meaningful measures.

It is extremely difficult to fully mitigate the potential adverse impacts on Section 75 groups or provide alternatives given the scale of the funding gap and the fact that these groups are generally disproportionately high users of health services compared to other groups.¹⁷

In COPNI's report *At the Centre of Government Planning. The Programme for Government and Preparing for an Ageing Population*, we assess that if nothing is done in terms of planning and preparation to face the challenges of demographic ageing, older people will be the first ones to suffer the consequences, as they are going to be especially vulnerable to the prospect of increasing competition for public resources. It is for this reason that we recommend that coordination and planning is done across departments to face these challenges, as individual departments will be incapable of facing these issues alone. Indeed, as the consultation document for the present Budget notes, further work is required "to determine the allocation of funding to priority areas."¹⁸

¹⁶ Department of Finance (2025) [Draft Budget 2025-26. Cumulative Equality Impact Assessment](#); page 1.

¹⁷ Department of Health (2025) [Draft Budget 2025-26 - Equality Impact Assessment](#); page 39.

¹⁸ Department of Finance (2025) [Draft Budget 2025-26. Cumulative Equality Impact Assessment](#); page 7.

This response does not aim to discuss in detail the potential impact of the Budget on section 75 groups. It is clear that the impact is going to be high, and older people will not be sufficiently protected against the consequences of diminishing resources. It is futile to restate what the present consultation document and what other departments already acknowledge—older people will be enormously affected. In essence, we believe that while there is a value in repeatedly stressing the effect on older people of budget cuts, it is more important to highlight that this is not a bump in the road, but a structural issue that has identifiable roots.

It is necessary for government to accept in theory and in practice, that departments cannot work in isolation, and that reaching the goal of delivering the same level of service with less money can only be achieved with a great deal of planning and cross-departmental collaboration. In the recent Budgets published by different departments, this desirable level of collaboration has not been shown.

Yours sincerely,



Chief Executive