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Women's Budget Group

The UK Women's Budget Group is an independent, voluntary organization made up of over 200 individuals from academia, non-governmental organizations and trade unions. We have been scrutinizing the gender implications of the Budgets and spending plans of UK governments since the early 1990s.

We are a member of the Equality and Diversity Forum (EDF), and endorse its submission to the Government Review of the Equality Duty[1].

We would just like to expand a little on the EDF's recommendation that:

"Active use of qualitative and quantitative evidence to inform understanding of the likely impact of policy, service and employment decisions. Collecting information is not an end in itself but must inform action." (p. 2)

The Women's Budget Group (WBG) carries out its own assessment of budgets, spending reviews and financial statements, (see recently *The Impact on Women of Budget 2013* and *The Impact on Women of Autumn Financial Statement 2012 and Welfare Benefits Uprating Bill 2013*)[2]. We have practically no resources and rely on the unpaid expertise and contributions of our members and friends to carry these out. Nevertheless the WBG has managed in many cases to improve on the analysis behind HM Treasury's own equality impact statements. These are usually presented by HMRC as part of their general impact assessment of budgetary measures[3] and show all the signs of being treated as an unwanted "tick-box" requirement that is carried out, for presentational purpose alone, after a policy has been decided upon. Their quality is highly uneven, there seems to be no overall oversight of them and there is no sign of such equality impact analysis being used to decide on mitigating measures.

However, understanding the equality impact of planned measures is important and, if such understanding is to be used to inform action, must be done at an early stage. It would take only a small amount of resources for HM Treasury to develop a coherent methodology for such statements, ensure they are carried out at an appropriate stage in decision making and presented in an informative way alongside any mitigating measures that have been adopted as a result.

The EHRC is currently working with HM Treasury, Government Departments and others to build on existing models and good practice to develop a common and straightforward approach to assessing the likely equality impact of proposed spending review and budget

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[1] EDF, March 31 2013, Equality and Diversity Forum's Submission to the Government's Equality Duty Review; EDF, 19 April 2013, Equality Duty Review: Supplementary Evidence Submission from the Equality and Diversity Forum. Both available: http://www.edf.org.uk/blog/?p=22172

[2] Available alongside other WBG assessments: http://wbg.org.uk/RRB_Reports.htm

[3] HMRC 2013, *An Overview of Tax Legislation and Rates,* Annex A: http://www.hmrc.gov.uk/budget2013/ootlar-main.pdf

measures. The WBG is represented on the expert Advisory Group that will advise on the impact methodology and guidance that will best support fair, efficient and well-evidenced policy and decision-making. A key element of this will be to address some of the evidence and data gaps in such analysis. We would hope that the development of this methodology could then inform best practice that other public sector organisations might adopt.

In the light of our experience, the Women's Budget Group urges that any review of the public sector duty incorporates the requirement for public sector organisations to:

i) develop appropriate and proportionate methodologies that can be easily applied for the assessment of qualitative and quantitative evidence of the likely impact of policy, service and employment decisions using existing data;
iii) ensure that assessments are take place at a stage in decision making when mitigating measures can still be considered;
iv) publish the results of such assessments (including where mitigating measures have been adopted, both before and after accounting for those measures).

The above applies to individual measures. However it is also important that:

i) there is overall oversight of the quality of impact assessments made of individual measures
ii) where measures are interrelated and/or cumulative high quality combined impact assessments are produced of their combined equality impacts

And for the longer term:

i) that the methodologies of impact assessment are reviewed and improved on drawing on best practices from elsewhere and
ii) that any gaps in available data that can be remedied without undue expense are identified and filled.