



SAMARITANS

Response to
Department of Health
Equality Impact Assessment (EQIA)

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Introduction

Samaritans' vision is that fewer people die by suicide. Every seven seconds, somebody contacts Samaritans for help and our volunteers spend over one million hours responding to calls for help every year. We work across the UK and Ireland. In NI we have 600 volunteers across 8 branches, and a small staff team focusing on suicide prevention through outreach and policy. In 2021, in NI we answered 115,006 calls, which equates to 27,946 volunteer hours on the phone and we answered 10,057 emails. We also run a Listener Scheme in NI prisons (funded by the DoJ).

We welcome the opportunity to respond to this consultation on the Equality Impact Assessment from the Department of Health.

Northern Ireland (Interim) Arrangements Act 2023 & Guidance

The above Act and Guidance issued by the Secretary of State for Northern Ireland gives civil servants the power to make decisions and exercise departmental functions in the absence of Northern Ireland Ministers and an Executive.¹ However, there are certain limitations and guiding principles outlined in the guidance.

We would seek clarification from the Department regarding the specific section or provisions of the relevant legislation or guidance that grant the Permanent Secretary the authority to unilaterally stop funding to the community and voluntary sector completely. It is crucial to have a clear understanding of the legal basis and the extent of the authority granted to civil servants in such matters.

The recent decision by the Department of Education to reverse funding cuts raises questions about whether civil servants have the authority to entirely cut funding from a grant scheme that was established by a Minister. Section 3 of the Act clarifies that senior officers of Northern Ireland departments can exercise departmental functions if they determine it is in the public interest during the period until an Executive is

¹ <https://www.gov.uk/government/publications/guidance-on-decision-making-for-northern-ireland-departments-may-2023>

formed. However, the guidance emphasises that major policy decisions, including significant expenditure commitments, should normally be left for Ministers to decide or agree upon.

Considering the information provided, it raises concerns regarding the unilateral decision to completely halt funding to the charity sector without the involvement or direction of elected Ministers. The guidance acknowledges that major policy decisions and expenditure commitments are typically the responsibility of Ministers. By circumventing this process, there are questions surrounding accountability, transparency, and the legitimacy of such a decision. It is vital to ensure that funding allocation decisions are made through a robust and inclusive process, taking into account the public interest, stakeholder input, and the potential impact on essential services and community well-being.

Therefore, it is crucial to review and scrutinise the recent decision to stop funding completely to the charity sector, questioning whether it aligns with the principles outlined in the guidance and whether it adequately considers the wider implications and potential consequences for organisations and communities affected.

EQIA Response

We would like to draw your attention to the Northern Ireland Audit Office recently published comprehensive report titled "Mental Health Services in Northern Ireland."² The report highlights the current state of mental health services and provides an evaluation of their effectiveness in the region.

The report identifies a significant lack of resources allocated to mental health services in Northern Ireland, resulting in inadequate support for those in need. Indeed, we are still seeing a high number of people dying by suicide in Northern Ireland with recent statistics showing 237 deaths in 2021.³

² <https://www.niauditoffice.gov.uk/publications/mental-health-services-northern-ireland>

³ <https://www.nisra.gov.uk/publications/suicide-statistics-2021>

Moreover, the report highlighted the limited community-based services, leading to a greater reliance on acute and crises services. As well as the inequitable distribution of services, uncovering disparities in the distribution of mental health services across different geographical areas, leaving certain communities underserved.

After assessing the situation, it is clear that several critical factors have significantly affected the quality of the EQIA conducted by the Department. These factors encompass inadequate evidence, a lack of a logical progression from evidence to impact determination, and the omission of information regarding mitigations or proposed actions. Addressing these shortcomings is vital to accurately assess the impact on Section 75 groups and fulfil the Department's equality duties under Section 75 of the Northern Ireland Act.⁴

The EQIA lacks sufficient evidence to support the claims about the impact on Section 75 groups. To improve the assessment, we recommend it is necessary to gather robust evidence that clearly demonstrates the potential impact on various equality categories. We recommend pausing the budget cuts to the charity sector and conducting a comprehensive data collection audit. This audit should involve collaboration with organisations like Samaritans and other relevant stakeholders to gather the necessary evidence and data on the impact of budget cuts on marginalized communities, particularly those with mental health issues and those at risk of suicide. By implementing this recommendation, the Department can strengthen the quality of its EQIAs, enhance evidence-informed decision-making, and improve its understanding of the potential impact of budget cuts on Section 75 groups, including their mental health and well-being.

Recommendation: Pause the budget cuts and conduct a comprehensive data collection audit in collaboration with organisations like us and other relevant stakeholders.

⁴ Para 2.3, [Department of Health Approved Equality Scheme 2022](#)

Another key issue identified with the current budget cuts is the potential impact on mental health and suicide rates within Section 75 groups. These cuts may have detrimental effects on the well-being of individuals already struggling with mental health issues and increase the risk of suicide. It is essential to consider the profound implications of these cuts on the mental health support available to vulnerable individuals and the potential consequences for suicide prevention efforts.

Recommendation: We recommend that the Department undertakes a comprehensive assessment of the potential impact of the current budget cuts on mental health support and suicide prevention efforts within Section 75 groups.

The absence of information regarding mitigations or actions that the Department intend to implement is a notable flaw in the assessment. When conducting EQIAs, it is essential not only to identify the potential adverse impacts on Section 75 groups but also to develop strategies and plans to minimize those impacts, including addressing the mental health needs and suicide risk factors within these communities. By omitting this crucial information, the assessments fail to provide a comprehensive and proactive approach to addressing inequality and hardships faced by marginalized communities. Mitigations or actions are essential because they demonstrate a commitment from Departments to actively address the adverse impacts on Section 75 groups. These measures can help alleviate the disproportionate effects of budget cuts, ensure that the needs of vulnerable communities are considered and met, and reduce the risk of increased mental health issues and suicide rates.

Recommendation: The Department should develop and implement specific mitigations and actions to address the potential adverse impacts on Section 75 groups, including their mental health needs and suicide risk factors.

In terms of the impact on service users within the charity sector, it is essential to recognise the significant role played by Samaritans in delivering vital services to marginalised communities. The proposed core funding budget cuts will have adverse effects for those we serve. Samaritans often focus on meeting the needs of those in crisis, providing early intervention and prevention measures to prevent individuals from reaching critical points where the costs of support would be much higher. By reducing funding for our essential support services, the Department risk compromising the well-being and support available to individuals in need, including their mental health and the risk of suicide.

Recommendation: The Department should reconsider the proposed budget cuts to Samaritans core grant, as we play a significant role in delivering vital services to marginalized communities. These cuts may compromise the well-being, mental health support, and suicide prevention efforts for individuals in need. Preserving funding for Samaritans will ensure the continuity of our essential early intervention and prevention measures.

Conclusion

The decision to withdraw funding for the Department of Health's core grant aligns with the policy outlined in Section 75 of the Northern Ireland Act 1998.⁵ The Department's EQIA for its Budget 2023-2024 acknowledges that the cuts to the core grant will have an adverse impact on children and individuals with disabilities.⁶

However, the EQIA fails to recognize the potential adverse impact on other categories resulting from these cuts. Considering the significant number of organisations providing support to Section 75 groups that will be affected by the core grant cuts, it is imperative to revisit this issue promptly.

Under Section 75, the Department of Health has an obligation to address any potential adverse impacts identified in an EQIA. This includes finding ways to mitigate the adverse impact on the enjoyment of equality of opportunity or

⁵ Para 2.3, [Department of Health Approved Equality Scheme 2022](#)

⁶ Page 25, [doh-budget-eqia-cons.pdf \(health-ni.gov.uk\)](#)

introducing alternative policies that better promote equality of opportunity for members of the nine protected Section 75 groups. Therefore, it is essential for the Department to reconsider its approach and take proactive measures to mitigate any negative consequences identified in the EQIA.

It is crucial to address the deficiencies in the EQIA conducted by the Department. This involves revisiting the potential adverse impact on various categories resulting from the proposed core grant cuts and fulfilling the Department's obligation to mitigate any negative effects on the enjoyment of equality of opportunity.

The proposed core funding cut will have adverse effects on those who use our service, particularly in terms of their mental health. It is crucial to recognise the profound impact on mental health and suicide issues and the benefits of continuing to fund vital services provided by Samaritans and other charities through the grant scheme.