

**A Response to the consultation document -**

**Integrated Impact Assessment**  
**Consultation**  
**Water Reform Northern Ireland**

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## **Introduction**

The Women's Support Network (WSN), established in 1989, is an umbrella organisation for more than 40 community-based women's centres, women's projects and women's infrastructure groups. The WSN aims to achieve social, political and economic justice through the promotion of the autonomous organisation of women. The Network also aims to strengthen the collective voice for women's groups, to promote and develop networking to enable collective action and to influence policy and decision making processes. The WSN is an important vehicle for taking forward the common agenda of community-based women's organisations, many of which are based in the most disadvantaged areas of the city and which have experienced the worst effects of the political conflict.

## **General Questions – the human right dimension**

Access to clean water should be a fundamental human right. For women, who have the major responsibility for looking after families, the tasks of cooking, cleaning and washing cannot be performed without the help of water. In many parts of the world today, young girls and women spend a significant portion of their day fetching and carrying water, often over long distances. The WSN is highly conscious of the important role of water in the lives of all humankind. As a women's organisation concerned to present the specific views of women to policy makers, we take this opportunity to present our response to 'Water Reform Northern Ireland'. Older women, those performing caring roles, families with young children and large families are all particularly affected by what is proposed. We believe that the proposals will have an adverse impact on these groups.

## **Health Impact**

While the document states that domestic charging arrangements will be structured to take due account of ability to pay and also supported by provisions to protect low income households, this assumes that the current welfare system will prevent vulnerable groups being forced into water poverty. But it is inevitable that some will fall outside of these schemes. The proposed relief of 25% may not be sufficient. Health may be affected by a number of factors, for example, by the stress of the charges. As water is indispensable for the maintenance of daily life, enforced savings in other areas may have extremely significant adverse consequences: savings on heat to pay for water leading to hypothermia; savings on food to pay for water charges. It is impossible to reach a precise view of the impact of water charges, but there is evidence from Britain to suggest that inability to pay has serious consequences for the health of vulnerable family members.

## **NEW TSN**

1. New TSN has no target to reduce income poverty, so it is impossible to reach a precise view of the impact of the water charges. However, if there were targets, these would be adversely affected by the introduction of a water charge.

In our view, the analysis is misleading, particularly the statement about the use of capital values as a variable element 'which has the effect of skewing higher charges towards more affluent areas.' While the skewing of charges towards the higher capital values will lessen the impact on those with low incomes, compared with, for example, a flat rate charge, nevertheless the skewing is so light that it will not make a significant impact.

64% of all households have an income below the average (Households Below Average Income NI, 2002/3). These households will be disproportionately concentrated in the lower capital values houses, therefore the bulk of the £300 million raised by the new water charge will be paid by those on low incomes.

2. In terms of other comments on the compliance of Water Reform with New TSN, it suggests that the proposed 'special rate relief scheme' together with the existing benefit scheme, will embrace those who need assistance. However, the analysis is at such a high level of abstraction that it is impossible to make any judgement. In addition, it assumes that the discount of 25% will be sufficient to avoid hardship. But no evidence is presented to support such an assumption.

3. Any other evidence to take into account? The extent of income poverty in Northern Ireland and the extent of consensual poverty in Northern Ireland, as defined by the *Bare Necessities* report (Hillyard et al 2004).

### **Equality Impact Assessment Questions**

1. We believe that the EQIA is extremely limited in analysis. There would need to be a more detailed consideration of the overall impact on different socio-economic groups. While we accept that the Section 75 requirements need to be considered, we believe that the emphasis on Protestant/Catholic impact detracts from the fact it is the poorest and most vulnerable in our society who will be disproportionately affected.

2. The EQIA does that that the elderly and carers will be adversely affected and more consideration must to given to this.

3. In numerical terms, if there is to be a standing charge of 35% of the total supply, with a cap of £750 to ensure that the most expensive properties do not incur substantial charges, we would argue that this will continue to favour those at the higher income levels. The difference in income levels is much greater than this, so the price differential for water charges could also be made greater, to reflect ability/inability to pay rather than simply consumption.

If 25% of £320 is deducted, this sum is only £80. This means that £240 must still be paid, which is a large sum for those on benefit.

## Appendix 1

### **WSN Member groups**

Al-Nisa Women's Group  
Ardoyne Women's Group  
Ashton Centre  
ATLAS (Lisburn)  
Ballybeen Women's Centre  
Ballymurphy Women's Centre  
Belfast Travellers Education & Development Group  
Brook (Belfast)  
Citywide Women's Consortium  
Derry Women's Centre  
East Belfast Community Education Centre & Walkway Women's Group  
Falls Women's Centre  
Footprints Women's Centre  
Greenway Women's Centre  
Lenadoon Women's Group  
Lesbian Advocacy Service Initiative  
Northern Ireland Women's European Platform  
Parenting Forum NI  
Shankill Women's Centre  
South Tyrone Empowerment Programme (STEP)  
Strabane & Lifford Women's Group  
Windsor Women's Centre  
Women's Information Group  
Women into Politics  
Women's News  
Women's Resource Development Agency  
Women's Tec