

UK Women's Budget Group

Comprehensive Spending Review Representation 2020

The UK Women's Budget Group (WBG) is an independent network of leading academic researchers, policy experts and campaigners that analyses the gendered impact of economic policy on different groups of women and men and promotes alternative policies for a gender equal economy.

We welcome HM Treasury's commitment to hearing the views of civil society ahead of the Comprehensive Spending Review (CSR.) The current spending review takes place in uncertain circumstances: in the midst of a global pandemic with fears about a national 'second wave' circling. The Government has been quick to protect jobs and commit to investment as a way to stimulate the economy after coronavirus.

Yet, it is clear that the public health and economic crises from coronavirus collide with pre-existing crises in public services including the NHS, local government and social care which have been underfunded in recent years. The CSR must commit to rebuilding the economy in a way that builds our resilience to future shocks and addresses the problems that the virus has exposed and exacerbated. For this reason, our representation focuses on **a new approach to the economy and to investment so that reform and refinancing of social infrastructure is put front and centre of a care-led recovery from coronavirus.**

It is not just roads, rails and high-speed internet that get people to work and contribute to the economy, but health, social and childcare.

Our submission focuses on the need for:

1. a care-led recovery from coronavirus which invests in social infrastructure. Our research finds that these investments are more effective at creating jobs and therefore boosting tax revenue than the same investments in construction.
2. Reform of the social security system to protect millions from financial hardship and poverty, particularly as the CJRS and SEISS schemes are rolled back.
3. A commitment to refinancing local government as an integral part of the 'levelling up' agenda.
4. A commitment to an annual spend of X on domestic abuse services to keep all women and girls safe from violence and abuse.
5. Meaningful equality impact assessments to be undertaken on all CSR proposals and a cross-departmental approach to securing equality.

Investing in social infrastructure: a care-led recovery

The Prime Minister's ambitions to 'build build build' are a welcome recognition of the need to invest in infrastructure and jobs in the recovery from coronavirus. However, a holistic recovery which benefits everyone requires a changed approach to infrastructure which recognises that social infrastructure (health, education, child and social care) is just as important as physical infrastructure in boosting the economy and creating decent jobs. In fact, simulation modelling by WBG finds that investment in care is *more* effective at creating jobs than investment in construction:

Investment in care in the UK would produce **2.7 times as many jobs** as an equivalent investment in construction: **6.3 times as many jobs for women** and **10% more for men**. Investment in care is **greener** than in construction and more of its costs would be recouped in **increased income tax and National Insurance contributions**.

Table 1 Raising employment in care to 10% of employed population: employment generated and spending required under various wage scenarios

	With wages in care at:			
	Current level	Raised by 24% for all care workers	Raised by 45% for new care workers (24% for existing)	Raised by 45% for all care workers
Total number of jobs generated	1,982,000	2,110,000	2,161,000	2,215,000
of which % for women	71%	70%	69%	69%
Effect on gender employment gap (% pts)	-4.0	-4.0	-3.9	-3.9
Effect on total employment rate (% pts)	4.8	5.1	5.2	5.4
Gross spending required (% GDP)	2.8%	3.6%	3.9%	4.3%
Net spending (% GDP)	1.9%	2.3%	2.5%	2.7%
Multiple of total employment created for same net spending on construction	3.1	2.7	2.5	2.4

Source: Calculations by Jerome De Henau for WBG, based on 2015 data from Eurostat

A better care system requires a greater proportion of total employment working in the care sector. If, like some Scandinavian countries, the UK had **10% of its employment in care**, a net annual spending of **1.9% of GDP** would be required and would generate nearly **2 million jobs** in the economy as a whole, raise the overall employment rate by 5 percentage points and reduce the gender employment gap by 4 percentage points.

The coronavirus pandemic has exposed and exacerbated the UK's crisis in care. Currently, **UK parents pay the highest childcare costs in Europe** and the second highest in the world, and **1.4 million older people have unmet care needs**. The care sector has suffered the worst fatal and financial consequences of the pandemic and as the CJRS and SEISS end, shortages in care will prevent parents, especially mothers, from returning to work, leaving them at risk of discrimination and turning back the clock on women's labour market enrolment and economic productivity.

Investment in care is not only needed to transform our broken social care system, it is an **excellent way to stimulate employment**, reduce the **gender employment gap** and counter the inevitable economic recession as the UK comes out of lockdown.

A better care system also requires a **rethink of how the sector is structured**, something which the Government has made laudable commitments to address. Residential care especially has been left vulnerable to profiteering while domiciliary care is plagued by precarious working arrangements that privilege productivity above the quality of care and wellbeing of staff and recipients.

Polling shows strong consensus that health and **care workers should be better trained and paid**. Paying all care workers the national living wage and, as training and qualifications improved, subsequently raising pay would increase the net cost, eventually to 2.7% of GDP, but still generate **more than twice as many jobs** as the same net spending on construction. Investing in care is economically sound not only because it generates employment but also because it helps create a healthier, better educated and more productive population.

These investments are also future proof: Eurostat data tell us that each job created by investment in care is only one third as polluting (in terms of GHG emissions) as each job created by investment in the construction industry¹. **As a result, the total emissions from investing in care are lower, at 85% of those of an equivalent investment in construction, even though each pound invested in care produces nearly three times as many jobs**. Investment in social infrastructure is environmentally preferable as well as better at creating jobs and promoting equality.

Cost effectiveness of childcare investment

With 1 in 4 providers saying they may be forced close within the year², investment in childcare is urgently needed. This is a cost-effective investment that would boost productivity among women especially because they still do more unpaid childcare and domestic work than men.

Providing free universal childcare for all 3.1m children (40 hours a week for 48 weeks a year), would require an initial investment in 2018 prices of between £39bn (1.8% GDP) and £58bn (2.7% of GDP) - depending on the wages of childcare workers. This would create between 1.4 million and 1.5 million full-time equivalent jobs, raising women's employment rate by between 5.6 and 5.9 percentage points. **Direct and indirect taxation on income and consumption has the potential to recoup between 76% and 72% of this annual investment leaving between £9bn and £16bn net funding figure**. Funding is also recouped through the reduction of families claiming social security³.

Social security to avoid poverty and hardship

Social security is also a form of social infrastructure that will be essential to keeping millions out of poverty as the income protection schemes come to an end and employers are forced to make redundancies. At this time especially the restrictions put in place in 2015 need to be suspended to

¹ Calculations by Jerome De Henau for WBG, using Eurostat data <https://ec.europa.eu/eurostat/data/database>

² "According to a survey of more than 3,000 nurseries, pre-schools and childminders by the Early Years Alliance, one in four say they will have to close permanently within the next 12 months due to financial problems." BBC News (5 May 2020) *Coronavirus: The nursery I run may not survive* <https://www.bbc.co.uk/news/business-52506919>

³ De Henau, J. (2019) 'Employment and fiscal effects of investing in universal childcare: a macro-micro simulation analysis for the UK', IKD Working Paper No. 83, March (<https://bit.ly/2C8E8vQ>) All figures updated for 2018. Figures are not simply higher compared to 2014 because the child population is slightly lower but also teacher pay rise was slightly less than inflation while GDP and living wages have increased, so differential between the two scenarios is less than in 2014.

avoid unnecessary destitution of, especially the poorest women.⁴ Crucially, in the short term, the Government must act to avoid poverty by:

1. **Lifting restrictions on benefits that are causing in-work, child and women's poverty⁵** : Local Housing Allowance (LHA) rates should be raised to the 50th percentile of rents; the benefit cap, under-occupancy penalty (or 'bedroom tax') and two child limit should be abolished; and the personal allowance in Universal Credit and working tax credit further increased, or at least the uplift made permanent and proportional to household size.
2. **Getting Universal Credit to claimants sooner by making advances non-repayable grants**: Currently families are having to wait five weeks for a payment, or accrue debt in the form of an advance, which is only available as a loan. At least during the crisis, the Government should convert this into a non-repayable grant.
3. **Increasing Employment and Support Allowance, JobSeekers Allowance** and other benefit payments in line with the rise in Universal Credit and Working Tax Credit.
4. **Increasing Child Benefit, to £50 per child**: the Covid-19 outbreak threatens to exacerbate child poverty, and the lockdown increased costs for households with children. A temporary uplift is necessary to ensure children do not lose out.
5. **Suspending the 'No Recourse to Public Funds' condition**: Excluding many migrant women from support risks exposing them to the virus, which threatens the public health response, and fails to recognise the vital role many migrant workers are playing in combating the pandemic.

In the longer term, there is a need for a wider change to the social security system. Public attitudes to social security are in flux as many people who may never have imagined themselves doing so are now relying on social protection in one form or another, whether it be the job retention scheme (CJRS) via their wages from their employer, self-employment income support scheme (SEISS), Jobseeker's Allowance and/or Universal Credit.

UC has been shown to be unable to meet needs adequately⁶. More investment in social security will be required to design a better system that prevents poverty and destitution and provides security of income at an adequate rate to allow people to live with dignity and agency as well as the additional costs of disability or caring responsibilities.

To meet these aims, a better social security system should be:

- **Individually allocated as far as possible**, so as to foster economic autonomy for individuals and make financial abuse more difficult to perpetrate. Individual interests may not coincide within a family or household and therefore individual access to income also matters.
- **Non-means-tested**, to prevent and not just provide relief from poverty; to compensate people for additional costs (such as children or disability related); and to ensure that individuals have access to an alternative source of income, so as to be able to refuse degrading forms of

⁴ For more information on the gendered and racialised nature of the social security system see WBG and The Fawcett Society (2020) Social security and Covid-19 <https://wbg.org.uk/analysis/uk-policy-briefings/briefing-social-security-and-covid-19/>

⁵ House of Lords Economic Affairs Committee (2020) Universal Credit isn't working: proposals for policy reform <https://bit.ly/2YSWZHd>

⁶ House of Lords Economic Affairs Committee (2020) Universal Credit isn't working: proposals for policy reform <https://bit.ly/2YSWZHd>

employment. Some means testing will still be required, but autonomy ought to be prioritised here.

- **Encouraging the sharing of care**, so that the gendered division of labour is not exacerbated. No policy should rely on just one individual having to be the main carer or the main earner in a family.
- **Taking a life-course approach**, so that the benefits system does not impede movement into and out of different types of employment that suit people at different stages of their lives. It should recognise that many people, particularly women, have employment histories interrupted by caring breaks and ensure that this does not lead to poverty in old age.
- **Designed by and for users**, so that the decision-making process on future reforms includes the views and voices of users, as well as those of other experts. This also includes adhering to the spirit of international obligations such as the UN Conventions on the rights of the child, disabled people and women.
- **Assessed by equality analysis at every stage** as an integral part of the policy-making process⁷, in other words when policies are designed, implemented and revised.
- **Part of a holistic review of social security, tax and public services**, because people need public services as well as income. Social security works in combination with other parts of the social protection system, including housing and health, social and child care, and needs to be evaluated as part of that system as a whole and the taxation system that funds it, including for its equality impact.

Refinancing the Department for Work and Pensions to reform the system will have a positive impact on gender equality for a number of reasons:

1. In the UK, women on average continue to earn less than men. This is cause and consequence of the fact that women continue to take on responsibility for more unpaid care work than men— of children, and older or disabled people - leaving them with less time for paid work across a lifetime. This means that, on average, women are more likely to rely on social security and receive more of their individual and household income from the social security system than men.
2. There are also many women who cannot do paid work due to sickness, disability or caring responsibilities: women are the majority of disabled people and those caring for disabled people⁸. A social security system that provides for these women is vital to recognise their humanity and wider contributions to society going beyond paid employment.
3. Social security also has a vital role in securing economic independence for all women. Economic *dependence* makes women more vulnerable to domestic and sexual abuse and violence since they may be unable to leave abusive relationships, households or contexts due to financial constraints. And more generally, economic dependence can undermine autonomy and equality in relationships.

Children are often poor because their mothers are poor. The design of this system would be an investment in the future of economic and social wellbeing. Spending on it has long-term

⁷ WBG (2018) Inquiry into Enforcement of the Equality Act, Response from the UK Women's Budget Group <https://bit.ly/2ECtW3L>

⁸ WBG (2018) Disabled women and austerity <https://bit.ly/3503OdA>

implications. For example, children living in poverty are less likely to stay in education, and more likely to have physical and mental health problems and reduced healthy life expectancy. The financial costs of child poverty in Britain were estimated to be £25 billion in 2008, with roughly half of these costs the effects on GDP of the diminished productivity of adults who had lived in poverty as a child, and the other half the cost of public spending on the services⁹ dealing with the more short- and medium-term consequences of child poverty¹⁰.

Paying for coronavirus

Clearly these and other investments to pay for and recover from coronavirus will cost the Treasury. They are worthwhile investments which generate long term benefit for the economy as a whole and bring in some cases (as for childcare above) pay in large part for themselves. In the short term, low interest rates and a need to stimulate demand make borrowing the best way to pay for the measures taken to combat the pandemic and the substantial investment required for the recovery programme.

In the long run, revenue for a greener fairer economy should be generated using progressive taxation which redistributes income and wealth, including between women and men. Such a fairer tax system would close tax loopholes, redistribute wealth between women and men and, hold transnational corporations to account for practices that exploit people and planet. Tax reforms should include: a fossil fuels tax for corporations, a financial transaction tax and reform of income and corporation tax in a more progressive direction.

Addressing wealth inequality in the UK must be a priority for this and current spending reviews. We therefore support the proposed reform of Capital Gains Tax to equalise tax on unearned income with earned income. Since men have significantly more unearned income than women, this would also help rectify wealth inequalities between women and men. At the same time the government should scrap Entrepreneurs Relief. IPPR estimate that this could raise £90bn over five years.¹¹ This approach would reduce the current favourable tax status afforded to capital gains, which benefits men over women, and it would increase government resources to spend on public services.

Crucially, WBG recommends a review of the taxation and social security systems *together* after the recession¹² and, along with Tax Justice UK¹³, recommends the following principles for gender-equal tax reform:

1. Reintroduce genuine independent taxation of income, by **abolishing the marriage allowance and the high-income child benefit tax charge**

⁹ These costs remain whether or not the requisite services are provided. Where services have been cut the direct cost to the state may have fallen, but the true cost of child poverty has not diminished. Rather, some of that cost is being shifted to those whose needs for help are not being met and, through failing to prevent more serious problems developing, is likely to result in more costs to the state in the future.

¹⁰ Donald Hirsch, 2008, *Estimating the Cost of Child Poverty*, York: Joseph Rowntree Foundation; Blanden, J., Hansen, K. and Machin, S. (2008) *The GDP costs of the lost earning potential of adults who grew up in poverty*, York: JRF; Bramley, G. and Watkins, D. (2008) *The public service costs of child poverty*, York: JRF.

¹¹ <https://www.ippr.org/files/2019-09/just-tax-sept19.pdf>

¹² Himmelweit, S. and Bennett, F. (2020) Taxation and social security <https://wbg.org.uk/wp-content/uploads/2020/03/tax-and-social-security-overview.pdf>;

¹³ Palmer, R. (2020) Wealth, tax and gender <https://wbg.org.uk/wp-content/uploads/2020/03/tax-and-social-security-overview.pdf>

2. Consider **abolishing the personal tax allowance to fund a small cash payment to all adults** – which would not avoid the need to think about the amount and structure of other benefits
3. **Tax dividend income at the same rate as income from work and remove the separate dividend allowance.** IPPR estimate that this could raise £26bn over five years based on the current income tax schedule.¹⁴ This would reduce gender inequality in disposable incomes, as well as provide more resources to spend on public services.
4. **Introduce a financial transaction tax to capture a broader range of transactions.** Estimates from the former head of derivatives trading at the London Stock Exchange are that this could raise £6.8bn a year and help to stabilise the economic system.¹⁵ This would benefit women as it would provide more resources for government spending and help reduce the current low tax approach to share transactions.
5. **Turn inheritance tax into a progressive tax on lifetime gifts taxed at income tax rates and limit reliefs.** This would help change the perspective of inheritance tax into one that was levied on lucky recipients, as opposed to someone who has just died. Such a tax would close off avenues for avoidance and would allow lower rates for basic rate taxpayers, making it harder to argue that inheritance tax is swingeing in its level. This approach would also have the effect of encouraging estates to be distributed among a larger number and less wealthy beneficiaries, and thus helping to disincentivise the remaining gender bias in current practices.¹⁶ The Resolution Foundation estimate that this change could raise £4.8bn a year.¹⁷
6. Replace council tax with a **proportional property tax levied on the property owner, and once this has been implemented, scrap stamp duty.** Replacing these two taxes with a proportional property tax would be more progressive and would bring in much needed revenues for cash-strapped local authorities. The Resolution Foundation estimate that this could raise £4.2bn a year.¹⁸ It would be important to ensure that the new system didn't disadvantage women, for example by not penalising lone parents or single pensioners, who are most likely to be women.
7. Reverse some of the recent cuts to corporation tax and **bring the rate back up to 24%**, which HMRC estimates could raise £12bn a year.¹⁹ In addition, the current approach to taxing multinational companies should be replaced with a **unitary system of taxation** where the profits allocated to the UK are based on a formula using UK sales, staff and assets. This would close down options for avoidance and create a simpler system to implement. Economists estimate that this could raise a further £6bn a year.²⁰

Levelling up local government

Local government is often best placed to support the needs of people, especially during the coronavirus pandemic when local authorities have had demands and duties increased. Women especially rely on local government as they provide vital services and social infrastructure to redistribute unpaid care work and support survivors/victims of domestic abuse. Both proximity and familiarity with local needs make local government best placed to promote growth and productivity.

¹⁴ <https://www.ippr.org/files/2019-11/reforming-the-taxation-of-dividends-nov19.pdf>

¹⁵ <https://progressiveeconomyforum.com/events/making-the-uk-a-citadel-of-long-term-finance/>

¹⁶ <https://drive.google.com/file/d/0B9LeBPRS-xnoM3R4WVJSZjIMMFhNRjZSZUxRdjZfWUpFdmVv/view>

¹⁷ <https://www.resolutionfoundation.org/app/uploads/2018/05/IC-inheritance-tax.pdf>

¹⁸ <https://www.resolutionfoundation.org/app/uploads/2018/03/Council-tax-IC.pdf>

¹⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/797042/190424_SS19_Direct_effects_of_illustrative_tax_changes_BULLETIN_FINAL.pdf

²⁰ <https://publicservices.international/resources/publications/taxing-multinationals-a-new-approach?id=10364&lang=en>

The Government was quick to increase funding to local authorities to respond to the coronavirus pandemic but this is negligible compared with the funding cut since 2010. Central government funding for local authorities fell by over 49% between 2010/11 and 2017/18²¹ with councils in the most deprived areas suffering the greatest cuts. As local authorities become increasingly responsible for communicating local lockdown measures, it is vital that they are refocused so that their responsibility is paired with adequate resource.

This means moving away from plans to make local authority funding entirely dependent on **locally raised revenue (council tax and business rates-based funding) and towards more centralised grants** to ensure funding is distributed based on need not dependent on local affluence.

Local government funding needs to be urgently restored to a level which **enables councils to meet their statutory obligations as well as providing the preventative, non-statutory services which are vital to the wellbeing of women, children and those in need of care**. Adequate funding should come from central government to ensure that local authorities in poorer areas, often with a higher need for services, have the funding that they need.²²

Violence Against Women and Girls (VAWG)

The coronavirus lockdown highlighted the problem of domestic abuse and the desperate funding situation for many women's refuges and services²³, especially those run by and for Black, Asian, ethnic minority and migrant women. The new Domestic Abuse Bill estimates the economic and social costs of domestic abuse to society to be £66 billion annually,²⁴ even before coronavirus. The current piecemeal approach to funding for domestic abuse and VAWG services more generally is not working and is not cost effective.

Home Office research published last year estimated the economic and social cost of domestic abuse alone at £66bn every year, with direct costs to the exchequer totaling over £5 billion annually – including £2.3 billion in health services, £1.3 billion in police costs, £550 million in housing costs, £476 million in criminal and civil legal costs, and £724 million for services for victims; and a staggering £14bn in lost working days. Costings are under-developed for sexual violence and abuse, but one Home Office assessment looking at the costs of rape and sexual offences to society and the victim, estimated the cost of rape and other sexual offences to the UK would be £12.2 billion per year.²⁵ In contrast to this high cost, NHS cost savings alone from VAWG organisations amounts to over £357 million per year.²⁶

²¹ WBG (March 2019) *Triple whammy: The impact of local government cuts on women* (<https://bit.ly/2GWnRP4>)

²² See WBG report for further discussion and recommendations: WBG (March 2019) *Triple whammy: The impact of local government cuts on women* (<https://bit.ly/2GWnRP4>)

²³ See WBG (2018) *Life changing and lifesaving: funding for the women's sector* <https://wbg.org.uk/analysis/life-changing-life-saving-funding-for-the-womens-sector-2/>

²⁴ UK Government (January 2019) *Transforming the Response to Domestic Abuse: Consultation Response and Draft Bill* (<https://bit.ly/2sH4AI5>)

²⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732110/the-economic-and-social-costs-of-crime-horr99.pdf

²⁶ This is a conservative estimate, cited from "Value of the Women's Voluntary and Community Sector Delivering Health Services" 2017.

The UK Women’s Budget Group supports the call from the Violence Against Women and Girls (VAWG) sector that, in addition to the £2.2bn that has been estimated as necessary to tackle domestic abuse alone in this spending period (Safe Lives, 2020), further spending pledges are needed of at least £102.7m²⁷ annually to ensure specialist sexual violence and abuse services are available for victim and survivors; and £57m annually to ensure that the existing highly specialist support services for Black and minority ethnic (BME) women are sustainable.

Women and the criminal justice system

In addition, WBG endorses the submission made by Women in Prison focusing on the need to provide sustainable funding to women’s centres for women involved in the criminal justice system. These have been proven to be by far the most cost-effective alternative to custody for women²⁸. We recommend a model of matched funding in which central and local government share the costs of delivering the objectives in the Government’s Female Offender Strategy²⁹.

Cross-departmental planning

Many of the issues affecting women’s lives stretch across different government departments (such as those relating to health and social care, Brexit or violence against women and girls). Similarly, while government departments are responsible for specific areas of policy, action taken by one department can impact upon others. Cuts to spending on social care has increased pressures on the NHS. Cuts to funding for NHS mental health services may increase pressure on other public services such as the police³⁰, and so savings made by one department are often offset by increased costs elsewhere.

When it comes to setting funding and policy priorities, it would make sense then for these to stretch across government departments as well. Problems need to be tackled holistically, particularly when attempting to put preventative measures in place. As it stands, the current Spending Review process largely discourages departments from working together, preventing them from being able to look at spending overall and find the best opportunities for greater synergies.³¹

We support the recommendation made in the recent Institute for Government report; that the Treasury “look beyond individual departments and use the review as a chance to solve problems that extend across departmental boundaries”.³² A focus on high-level strategy – aimed at identifying opportunities for departments to work together or share resources – should be fully reflected in decisions across government. Dealing with the consequences of Brexit is just one of the

²⁷ £52 million is required annually to support accredited Rape Crisis member Centres. £107.2m is required to support all recipients of the Rape and Sexual Abuse Support Fund.

²⁸ See Baroness Corston (2007) *The Corston Report*, Home Office
<https://webarchive.nationalarchives.gov.uk/20180207155341/http://www.justice.gov.uk/publications/docs/corston-reportmarch-2007.pdf>

²⁹ Ministry of Justice (2018) *Female offender strategy*
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719819/female-offender-strategy.pdf

³⁰ The Guardian (27 January 2016) ‘Mental health crisis takes huge and increasing share of police time’
(<https://bit.ly/2V0WTZM>)

³¹ Institute for Government (2018) *The 2019 Spending Review: How to run it well* (<https://bit.ly/2p2pEHp>)

³² Institute for Government (2018) *The 2019 Spending Review: How to run it well* (<https://bit.ly/2p2pEHp>)

areas that would benefit from this approach. The UK's ageing population is another; as might the forthcoming changes in local government finance.

Meaningful Equality Impact Assessments

Finally, the Women's Budget Group calls for HM Treasury to **ensure a comprehensive and meaningful cumulative equality impact assessment** is undertaken before the spending plans are finalised, in line with the requirements of the Public Sector Equality Duty and the recommendations of the Equality and Human Rights Commission and Treasury Select Committee³³.

A meaningful equality impact assessment must take account of the impact of a policy or budget allocation on all people and groups with protected characteristics including age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation.

For gender sensitive policy it is particularly important to **take account of how policy will impact individuals as well as households** as we know resources are not always equally distributed between women and men within households.

A gender equality impact assessment also requires policymakers to take account of how any policy reform will interact with **unpaid care work and, to take lifetime and cumulative approaches to policy reform**. For example, pension policy must take account of people's lives across a lifetime not in a snapshot. To avoid disadvantaging one group, policies must be considered together as well as individually.

UK Women's Budget Group, CSR representation, September 2020

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³³ For more detail on EIAs as well as an example of a policy which requires assessment see: WBG (2019) The Women's Budget Group (WBG) calls on the Department for Work and Pensions to assess and publish the impact of Universal Credit on women and men before 'managed migration' <https://wbg.org.uk/wp-content/uploads/2019/10/Policy-note-EIA-of-UC-before-MM-FINAL.pdf>