

Women's Policy Group NI

Women's Policy Group NI Response to Period Products (Free Provision) Bill Consultation (December 2021)

1. Introduction

The Women's Policy Group (WPG) is a platform for women working in policy and advocacy roles in different organisations to share their work and speak with a collective voice on key issues. It is made up of women from trade unions, grassroots women's organisations, women's networks, feminist campaigning organisations, LGBTQ+ organisations, migrant groups, support service providers, NGOs, human rights and equality organisations and individuals. Over the years this important network has ensured there is good communication between politicians, policy makers and women's organisations on the ground.

The WPG uses our group expertise to lobby to influence the development and implementation of policies affecting women. The WPG is endorsed as a coalition of expert voices that advocates for women in Northern Ireland on a policy level. This group has collective expertise on protected characteristics and focus on identifying the intersectional needs of all women; in line with international human rights mechanisms.

If you have any questions or queries about this consultation response, or would like the WPG and the relevant membership organisations to discuss recommendations in this response further, please contact Rachel Powell, Women's Sector Lobbyist, at rachel.powell@wrda.net.

2. Endorsements

The WPG welcome the aim to end period poverty in Northern Ireland and would like to endorse the response submitted to this Consultation by HERe NI, which is a member organisation of the WPG.

This is a joint submission on behalf of the Women's Resource and Development Agency (WRDA) and the Women's Policy Group (WPG). This response has been endorsed by the following WPG organisations:

- Women's Aid NI
- Women's Support Network
- Women's Regional Consortium
- UNISON Northern Ireland
- Cara Friend
- HERe NI
- Northern Ireland Women's European Platform (NIWEP)

3. General Comments:

Disclaimer: Whilst period poverty is a gendered issue that predominately impacts cis women and girls, it is important to note that not all women and girls menstruate, and that trans men and non-binary people are also impacted by period poverty and need access to period products. This response will focus on existing research on the specific and predominant impact period poverty has on cis women and girls, while also making recommendations for a trans inclusive approach to tackling this issue.

In developing this Bill and the proposals around it, the NI Assembly should take a co-design approach and work with women's sector organisations, LGBTQ+ organisations such as Transgender NI, and campaign groups already working on the issue such as Homeless Period Belfast. This co-design work should also involve schools, councils, local authorities and those impacted by period poverty, to ensure that the proposals effectively meet the needs of those who need to use period products in Northern Ireland.

i. Poverty and Stigma Surrounding Periods

A period is a natural and biological function for women and girls and many trans men and non-binary people. Despite the fact that periods are a natural bodily function that cannot be controlled, they continue to be a taboo subject with high levels of stigma attached and are rarely discussed nor given the attention they need.

On this island, this is evident in the recent backlash and decision to ban an advertisement for Tampax tampons in July 2020, which explained how to properly insert tampons¹. The advert received 84 complaints to the Advertising Standards Authority of Ireland (ASAI) for being “crude”, “vulgar”, “disgusting”, “offensive” and allegedly “unsuitable for children” and was subsequently banned, despite the fact it simply emphasised the need to properly insert tampons for them to be effective.

The high levels of stigma around periods further prevents necessary discussion around the barriers in accessing products, including financial barriers and the social implications this creates in the everyday lives of those who struggle to access period products. This stigma around periods and the barriers attached to accessing period products can further exacerbate gender inequalities that are prevalent in Northern Ireland.

Period poverty references the lack of access to period products due to financial constraints. Therefore, those impacted by period poverty are those who need period products and are unable to afford them. The reasons for this can include low income, homelessness, abuse, health conditions which make periods more painful/heavy or because they have no income of their own. An average period lasts around five days and can cost about £8 per month for tampons and pads, with some being unable to afford this cost.

As a result, some women and girls are forced to use alternatives such as toilet roll, socks or even newspapers as they are unable to afford the sanitary products they need. Furthermore, some may need to avoid educational, work or recreational activities altogether due to not having access to products. This is clearly not acceptable and is detrimental to daily functions, in particular,

¹ O'Connor, R. (2020), “Demeaning’ and ‘Offensive’ tampon ad banned in Ireland after 84 complaints’, *The Irish Post*, (available online): <https://www.irishpost.com/news/demeaning-and-offensive-tampon-ad-banned-in-ireland-after-84-complaints-190042>

impacting the ability to learn, work, concentrate and participate in everyday life.

These issues are significantly worsened for those with conditions such as endometriosis. Endometriosis is a condition that affects 1 in 10 women with symptoms of pain and heavy periods and costs the UK economy £8.2 billion a year in treatment costs, healthcare and loss of work². The average diagnosis time from first experiencing symptoms and receiving a diagnosis is 7.5 years. This is compounded by societal stigma around periods as well as a lack of awareness and effective treatment.

Many women and girls suffer in silence for many years with bleeding that is difficult to control. There is no doubt that the consequence of this is increased costs and increased period poverty as a result of missed days from school and work, damage to clothes, fear of leaking and increased expense with sanitary products. If the stigma and expense was eliminated, it would not only reduce expense and period poverty but would bring the topic of periods into the public domain. Increased public awareness of periods and health conditions associated with them could increase endometriosis diagnosis rates and enable women to control their symptoms more effectively.

For schoolgirls in particular, period poverty can have an extremely detrimental impact on their wellbeing and ability to study or concentrate in school as they are worried about their lack of products and how to afford them. Access to these products is essential to the health and wellbeing of women and girls across the world. In addition, trans people can also face particular stigma in purchasing period products, especially for trans children who may be “outed” or “clocked” as trans when purchasing them in shops.

If we really want to tackle stigma around periods, sanitary products should be made visible and accessible in communal places with posters and clear information about provision. For too long, women and girls have felt as though they have to hide their tampons and pads because they are seen as a source of embarrassment. This should not be the case. There is no need to hide the natural process of a period cycle. If we continue to whisper about periods and sanitary products then we add to a sense of unnecessary shame and stigma.

² See more: Endometriosis UK: <https://www.endometriosis-uk.org/get-support>

ii. Measures Taken Elsewhere – Scotland

In November 2020, Scotland became the first country in the world to create a legal right to accessing period products³. This Member's Bill, introduced by Monica Lennon MSP, requires that under the Bill:

- The Scottish Government must set up a Scotland-wide scheme to allow anyone who needs period products to get them free of charge,
- Schools, colleges and universities must make a range of products available for free, in their toilets,
- The Scottish Government will have the power to make other public bodies provide period products for free.

Within the Bill, it was recognised that period poverty can have a detrimental effect on the health and wellbeing of women, girls and trans people⁴. In particular, this Bill recognised that:

“Scottish Government statistics illustrate that, since the recession of 2008, relative poverty levels in Scotland have been slowly rising, with figures demonstrating that after housing costs, 19% of Scotland's population, or 1 million people each year, were living in poverty in 2014- 17.

The effect of this is evidenced in figures from the Trussell Trust which show that food bank use in Scotland is rising at a rapid pace, with 170,625 emergency supply parcels handed out in 2017-18 compared to 14,332 in 2012-13.2 Many are finding it difficult to afford basic necessities, including period products. Further Trussell Trust research shows that, in addition to food parcels, there is significant demand from users for other essential items, including period products.

Using period products for longer periods of time than is recommended or using unsuitable alternatives can lead to infections and health issues. Additionally, women, girls and trans

³The Scottish Parliament (2020), Period Products (Free Provision) (Scotland) Bill.

⁴The Scottish Parliament (2020), Period Products (Free Provision) Policy Memorandum: <https://beta.parliament.scot/-/media/files/legislation/bills/current-bills/period-products-free-provision-scotland-bill/introduced/policy-memorandum-period-products-scotland-bill.pdf>

people may feel they have no choice but to miss out on educational activities, work or recreation due to not having appropriate products.

The impacts of period poverty can be exacerbated where there are period-related health issues, such as endometriosis or polycystic ovary syndrome which can mean heavier or irregular periods and, as a result, an increased number of products might be needed each month.

Where people do not have access to their own income, they may struggle to access period products – for example, if a partner withholds money for products or if a young person is embarrassed to ask a parent or carer or is worried about the impact on the household budget and does not feel that they can ask for them.”⁵

iii. The Gendered Nature of Poverty

Similar to Scotland, poverty rates have also been steadily increasing in Northern Ireland, after a decade of harsh austerity and cuts that have disproportionately impacted women. This has been compounded by the disproportionate economic impact of COVID-19 on women. The Women’s Sector and several members of the Women’s Policy Group in Northern Ireland have completed several extremely comprehensive pieces of research and publications on the issue of poverty in Northern Ireland and the disproportionate impact on women. For instance:

- Women’s Regional Consortium Research on Ongoing Austerity and the Impact on Women in Northern Ireland – available [here](#).
- Women’s Regional Consortium Research on the Impact of Universal Credit and the Impact on Women – available [here](#).
- Women’s Policy Group NI COVID-19 Feminist Recovery Plan – available [here](#).
- Northern Ireland Rural Women’s Network (NIRWN) Publication on Poverty and the Economy – available [here](#).

⁵ *ibid*, pp.2-3.

It is particularly important to note that women have been the hardest hit by austerity, with 86% of tax revenue savings by the HMRC in the decade following the financial crash came from women⁶. The economic impact of COVID-19 on women has also been comprehensively covered in our [WPG COVID-19 Feminist Recovery Plan](#), as many families are struggling due to furlough, redundancies, increased food poverty and more.

Women have been disproportionately impacted by all of these economic factors, with lone parents (91% women in NI) and disabled people the worst hit by austerity measures. Women face much greater financial insecurity than men in Northern Ireland, with women undertaking the vast majority of low-paid, part-time, insecure and precarious work. Further, trans people are also disproportionately impacted by rates of homelessness and poverty which can exacerbate the barriers in accessing period products, which should be recognised in the aims of creating a meaningfully inclusive strategy to address period poverty.

More work is needed to address the disproportionate impact of economic crises in Northern Ireland; however, it is welcome that steps are being taken to begin addressing the impact poverty has on accessing period products.

iv. UK Government Actions and the 'Tampon Tax'

Most of the UK Government's action in relation to period products deals with the so-called 'tampon tax', which is the Value Added Tax rate on period products in the UK. Since 2001, the UK government had a VAT rate of 5% on period products, which was the lowest in the EU. From 2018-2020, the revenue raised from this VAT was allocated to a 'Tampon Tax Fund' in which the money raised through VAT on period products was used to provide funding to women's organisations and charities⁷. Despite the 5% VAT being applicable in Northern Ireland, it is important to note that no women's organisations in Northern Ireland benefited from this fund.

⁶ See WRC Research on 'Ongoing Austerity and the Impact on Women', p.18.

⁷ UK Government (2018), 'Women and girls set to benefit from £15 million Tampon Tax Fund', <https://www.gov.uk/government/news/women-and-girls-set-to-benefit-from-15-million-tampon-tax-fund>

It is welcome that this 5% tax was abolished on 1st January 2021, however, much more action is needed to address period poverty in Northern Ireland. Whilst Scotland was the first country in the world to make period products free for all, it is worth noting that England and Wales have also introduced funding to provide free period products in school and colleges; which left Northern Ireland as the only place in the UK without free products in schools.

The WPG welcomed efforts made by the previous Education Minister, Peter Weir, to roll out a pilot programme for free period products in primary and secondary schools, lasting three years, starting in the 2021/22 academic year⁸. This was a positive development, particularly as this will be supported by curriculum materials and communications on this scheme, which will hopefully address some of the stigma surrounding period products in schools.

However, much more is needed to tackle period poverty in Northern Ireland. In particular, this scheme is only available to schools with female learners and there needs to be broader access to free period products for trans people and those experiencing period poverty outside of schools. It would be preferable for a Bill similar to the Period Products (Free Provision) Bill in Scotland to be introduced in Northern Ireland instead as a matter of urgency to address the broader nature of the problem of period poverty.

v. Trans Inclusion:

As stated throughout this response, we welcome the opportunity to respond to the proposal for a Bill to ensure free access to period products, including in schools, colleges and universities. Period poverty is a gendered issue and can create financial and wellbeing challenges for women, girls, trans men and non-binary people seriously impacting on their ability to participate in society and reach their full potential.

As stated at the beginning of this response, the Women's Policy Group NI has a broad membership including women's organisations, LGBTQ+ organisations, human rights organisations, trade unions, feminist campaigning groups and

⁸ Northern Ireland Executive (December 2020), 'Weir outlines plans to end period poverty in schools' Available at: <https://www.northernireland.gov.uk/node/48647#:~:text=Education%20Minister%2C%20Peter%20Weir%20has,the%202021%2F22%20academic%20year>.

more. We would like to stress the importance of ensuring that this proposed Bill is inclusive of the needs of not only cis women and girls, but also trans men and non-binary people, in a manner that tackles the stigma and barriers of all who menstruate and face period poverty.

It is also important to note that while the issue of period poverty predominately impacts cis women and girls, not all those who have periods are women and girls. For instance, many trans men and non-binary people also menstruate, whilst trans women do not. It is important that any Bill that is developed is inclusive from the outset and does not create further barriers for trans and non-binary people in accessing period products.

We recommend that the development of this Bill is done through an approach of co-design with women's organisations and organisations such as Transgender NI, who are experts in inclusive language and appropriate measures to ensure accessibility of period products.

vi. Existing Period Poverty Research

There is a wealth of research available on period poverty that highlights the impact it has. For instance, Plan International UK research⁹ on period poverty and stigma amongst 1,000 girls and young women aged 14-21 found that:

- One in ten girls (10%) said that there had been unable to afford sanitary wear,
- One in seven girls (15%) said that they had struggled to afford it,
- One in five girls (19%) have changed to a less suitable sanitary product due to cost,
- More than one in ten girls (12%) has had to improvise sanitary wear due to affordability issues.

Plan International UK also provide further statistics on taboo and stigma surrounding periods and menstruation:

⁹ Plan International UK (2017), 'Plan International UK's Research on Period Poverty and Stigma', (available online): <https://plan-uk.org/media-centre/plan-international-uks-research-on-period-poverty-and-stigma>

- Nearly half (48%) of girls aged 14-21 in the UK are embarrassed by their periods
- One in seven (14%) girls admitted that they did not know what was happening when they started their period and more than a quarter (26%) reporting that they did not know what to do when they started their period,
- Only one in five (22%) girls feel comfortable discussing their period with their teacher,
- Almost three quarters (71%) of girls admitted that they have felt embarrassed buying sanitary products,
- One in ten had been asked not to talk about their periods in front of their mother (12%) or father (11%),
- 49% of girls have missed an entire day of school because of their period, of which 59% have made up a lie or an alternate excuse,
- 64% of girls have missed a PE or sport lesson because of their period, of which 52% of girls have made up a lie or excuse.

It is clear that the unaffordability of period products is an issue alongside the deep stigma surrounding periods. Both issues must be addressed simultaneously when addressing period poverty; through providing free period products to all who need them alongside an educational programme to tackle taboos and stigma around periods.

Locally, the [Homeless Period Belfast](#) have been extensively campaigning on the issue of period poverty for several years and recently delivered a petition with over 5,000 signatures to the Department of Education and NI Executive calling for free products in NI schools¹⁰. In their research of 200 school students, the Homeless Period found that:

- 74% had to leave a lesson, school or miss a day entirely due to lack of access to period products,
- 53% had to ask their teacher for period products due to not having any themselves,
- 87% said that a lack of access to period products had negatively impacted their attention in class and/or school attendance,

¹⁰ Uplift.ie, (2020) 'Free Period Products in NI Schools #MenstruationMatters' Petition: https://my.uplift.ie/petitions/free-period-products-in-ni-schools-menstruationmatters?fbclid=IwAR3tHEzT4Xmn0ljSGeM_NwAl_K7-EjB-ddHlKhzdJpoanXPPqmh_UzwOCUo

- 91% had to use toilet roll as a temporary measure at school,
- 89% stated that a lack of access to period products has affected their mental and emotional wellbeing.

In additional research surveying 100 teachers across Northern Ireland, the Homeless Period Belfast found that:

- 84% said that they have witnessed how the ongoing pandemic has exacerbated the need for period products in schools,
- 60% of teachers have had to buy period products out of their own wages.

They asked teachers who had used their own money to stock period products in their classrooms how they felt about this and were told:

'It made me realise that families are really struggling to buy basic products for their daughters.'

They also asked students how access to free period products in toilets would impact their experience at school and found that:

'I wouldn't miss as much class time and I would feel a lot happier knowing the products are in toilets, so I don't have to feel embarrassed approaching the school nurse or my teachers.'

Finally, they received the following testimony from a 15-year old girl:

'I dread getting my period in school. I have to make up that I am sick so I can go home because I'm too embarrassed to tell my friends that I don't have any money for pads and I can't ask my mummy because she's just lost her job and she's already struggling to do a food shop for me and my younger brother. I use toilet roll instead and I'd much rather use that at home and risk leaking in my own house than in school where everyone could see.'

The WPG supports the aims of the Homeless Period Belfast to fully eradicate period poverty. In doing this, it is necessary to consider the needs of all who need access to essential period products. In the creation of any Bill to tackle period poverty, we would call for an accessible approach that benefits everyone that needs access to period products.

vii. COVID-19 and Period Poverty

The WPG have been extensively involved in highlighting the disproportionate economic impact of COVID-19 on women and marginalised groups in Northern Ireland, as highlighted comprehensively in our COVID-19 Feminist Recovery Plan. In the context of period poverty, additional research from Plan International UK found that period poverty is an issue that has also been exacerbated due to the pandemic. As schools and youth centres were forced to close, many could no longer avail of free period products that had been made available in Great Britain¹¹.

Although these measures taken across GB were never implemented in Northern Ireland, this research shows the need to address period poverty beyond the implementation of free period products in schools with female learners. Research by Plan International UK found that during the initial COVID-19 lockdown:

- 30% of girls aged 14-21 have had issues either affording or accessing sanitary wear in lockdown,
- Over half (54%) of these girls used toilet paper as an alternative to period products,
- However, one in five (20%) also said that their periods have been harder to manage due to the lack of toilet roll available,

Of the 17% of girls who said they were unable or struggled to afford period products in lockdown:

- Over a third (37%) did not try to access any free sources of products,
- Two fifths (42%) of those said they did not know where to go to get them,
- A third (30%) felt too embarrassed to seek out a source of free products,
- 30% did not know who to ask.

The necessary lockdown measures across the UK also created problems in accessing period products for those who could afford them. This research

¹¹ Plan International UK (May 2020), '3 in 10 girls struggle to afford access to sanitary wear during lockdown', <https://plan-uk.org/period-poverty-in-lockdown#:~:text=New%20research%20from%20Plan%20International%20UK%20reveals%20t rue.by%20global%20children%E2%80%99s%20charity%20Plan%20International%20UK%20rev eal>

found that of the 22% of girls who struggled to access products (but could afford them):

- 64% said they could not find them in their local shops,
- 17% said they feared catching coronavirus if they left the house,
- 15% have been unable to leave the house to go shopping during lockdown.

In addition to this research, the Homeless Period Belfast now experiences three times the usual demand for their packs in 2020 than they had in previous years.

Period poverty is clearly an issue that will have been exacerbated for those with caring responsibilities (64% of carers in NI are women and 91% of single parents are women), key workers (79% of HSC staff in NI are women) and disabled or high risk people who were shielding. Women are also disproportionately represented in sectors that have been hardest hit by the pandemic, such as retail, hospitality and travel. Although gender-disaggregated data on redundancies is not recorded in Northern Ireland, redundancies have increased by over 74% in Northern Ireland in 2020¹² and around 133,000 more women than men were furloughed in the UK at the beginning of the pandemic¹³.

This illustrates some of the increased financial constraints facing women in Northern Ireland and the likelihood that many more will struggle to afford period products. COVID-19 has clearly exacerbated the already prevalent problem of period poverty in the UK, and although Northern Ireland never implemented free products in schools, the experiences in GB show the need for a Bill to tackle period poverty that looks beyond schools in order to make period products accessible for everyone that needs them.

¹² NISRA (2020) Northern Ireland Labour Market Report. Available at: <https://www.nisra.gov.uk/system/files/statistics/labour-market-report-december-2020.pdf>

¹³ Women's Budget Group UK (November 2020), 'HMRC data prompts concern of the 'gender furlough gap'', Available at: [https://wbq.org.uk/analysis/uk-policy-briefings/hmrc-data-prompts-concern-of-gender-furlough-gap/#:~:text=Key%20statistics%3A&text=Women%20were%20the%20majority%20\(52.1,than%20men%20across%20the%20UK](https://wbq.org.uk/analysis/uk-policy-briefings/hmrc-data-prompts-concern-of-gender-furlough-gap/#:~:text=Key%20statistics%3A&text=Women%20were%20the%20majority%20(52.1,than%20men%20across%20the%20UK).

4. Survey Question Responses (Clause by Clause Comments)

Q1. How would you like your response to be published?

I would like my response to be published.

Q2. Are you content that any of your suggestions which have been published to the Committee or the Assembly may inspire the text of an amendment?

Yes.

Q3. What is your name?

Rachel Powell.

Q4. What is your email address?

rachel.powell@wrda.net

Q5. Please indicate if you are providing a submission as an individual or an organisation.

I am providing a submission on behalf of the Women's Resource and Development Agency (WRDA) and the NI Women's Policy Group. This organisation (and its member organisations) has significant experience and expertise lobbying and campaigning on issues relating to women's health and period poverty.

Clause 1

Q6. Do you agree with the proposed duty described in Clause 1?

Yes.

Q7. Do you think the duty takes account of all necessary factors eg. dignity, accessibility, choice, differently able people, travel arrangements, consultation and advertisement of arrangements for provision of period products?

Yes. However, protections regarding these factors could be strengthened, as explained below.

Q8. Would you add, detract from or otherwise amend any element of Clause 1? If yes, what amendment would you make?

Protections appear to be provided for disabled women in Part 3 (1)(b) of Clause 1, which states that “Arrangements established and maintained under subsection (1) may, where they include provision under which period products may be delivered to a person, require the person to pay costs associated with packing and delivery (except where the person could not reasonably obtain products in accordance with the arrangements in any other way).”

However, it might be helpful to explicitly state the circumstances in which a “person could not reasonably obtain products in accordance with the arrangements in any other way.” This could offer additional protections for disabled women who might be required to cover packing and delivery costs if they cannot collect period products in person or do not have anyone to collect them for them.

Part 4 (b) puts a duty on the Department of Health to “consult on the arrangements to be established and maintained by it under subsection (1), including the locations in which period products ought to be obtainable free of charge.” When deciding where free period products will be available, it is important to consider if they are accessible to all. For instance, will a trans boy in an all-boys school be able to access these products? Will these products only

be available in girls' bathrooms in mixed gender schools? Will students or workers have to ask members of staff (and subsequently "out" themselves) for access to products? These are all important factors to consider in making period products free and accessible, so that all who need these products can readily access them.

In addition, there should be an explicit duty on the Department of Health, when consulting on "the locations in which period products ought to be obtainable free of charge," to take account of rural needs and ensure there is equal access to period products across urban and rural areas.

Similarly, when consulting on the types of period products to be made available (as per part 4 (c) of clause 1), there should be a duty on the Department of Health to consult the different needs of disabled women and women from different ethnic, religious, cultural and racial backgrounds. For a variety of reasons, different women require different period products and this diversity should be reflected in any consultation done by the Department of Health.

Clause 2

Q9. Do you agree with the proposed duty described in Clause 2?

Yes.

Q10. Do you agree that the clause takes into account all necessary aspects of preparation to roll out the scheme, such as identification of relevant public service bodies; provision of free period products at each of their sites; provision only for use while on those premises; the ability for Departments to make regulations about these arrangements on a phased basis; and the ability for the Assembly to use affirmative procedure to give a relatively high level of scrutiny to these regulations?

Yes. However, protections regarding these factors could be strengthened, as explained below.

Q11. Would you add, detract from or otherwise amend any element of Clause 2? If yes, what amendment would you make?

Part 6 of Clause 2 could be strengthened to offer additional protections for women and girls from particularly economically disadvantaged and impoverished backgrounds. Part 6 of Clause 2 states that persons can obtain period products sufficient to meet their needs while the person is in the premises. However, this could be strengthened to allow women and girls to take products home with them to use outside of the premises, if they cannot access period products at home. This would provide additional safeguards for women and girls who are particularly vulnerable to period poverty.

Clause 3

Q12. Do you agree that the principles set out in clause 3 - easy access, dignity, choice and publicised arrangements - are relevant and proportionate principles to underpin the implementation of this scheme?

Yes.

Q13. Would you add, detract from or otherwise amend any element of clause 3? If yes, what amendment would you make?

No.

Clause 4

Q14. Do you agree that this clause will help co-ordinate implementation between Departments and Public Service Bodies?

Yes.

Q15. Would you add, detract from or otherwise amend any element of clause 4? If yes, what amendment would you make?

Yes. Part 6 of Clause 4 states that "A Department may issue guidance jointly with another Department." This could be strengthened by noting that inter-departmental working is to be encouraged and that it is preferable for guidance to be issued jointly between Departments.

Clause 5

Q16. Do you agree that clause 5 would provide transparency as to how specified public service bodies are providing period products in the best interests of appropriate product users?

Yes.

Q17. Would you add, detract from or otherwise amend any element of clause 5? If yes, what amendment would you make?

Clause 5 could be strengthened by putting a duty on public service bodies to consult on the needs of users which fall into the various Section 75 groups, such as, religious minorities, ethnic minorities, racial minorities, people from the LGBTQIA+ community and disabled people.

Clause 6

Q18. Do you agree that this clause will make available timely, useful information that will benefit persons obtaining free period products?

Yes.

Q19. Would you add, detract from or otherwise amend any element of clause 6? If yes, what amendment would you make?

No.

Clause 7

Q20. Do you agree with the proposed duty in clause 7?

Yes.

Q21. Do you agree that this clause provides a comprehensive list of key definitions of terminology used throughout this Act?

Yes. The Women's Policy Group are particularly pleased to see that this clause has been drafted in line with gender neutral drafting practices to include all people who menstruate, including transgender and non-binary persons. The WPG is trans-inclusive and intersectional in its work and has campaigned for many years on the importance of advocating for gender equality for all women, including trans women and women from religious, ethnic and cultural minority groups.

Q22. Would you add, detract from or otherwise amend any element of clause 7? If yes, what amendment would you make?

No.

Clause 8

Q23. Do you agree that this clause signposts the reader to accessible and standardised explanations of the legal terms used throughout the language of this Act?

Yes.

Q24. Would you add, detract from or otherwise amend any element of clause 8? If yes, what amendment would you make?

No.

Clause 9

Q25. Do you agree that there should be two years to allow everyone to prepare for this new law?

Yes.

Clause 10

Q26. Do you agree that when it becomes an Act, this should be called the "Period Products (Free Provision) Act (Northern Ireland) 2021"? If no, what amendment would you propose and why?

Yes.

ENDS

For questions or queries regarding this response, please contact Rachel Powell, Women's Sector Lobbyist, Women's Resource and Development Agency at rachel.powell@wrda.net.