

Women's Policy Group NI

WPG NI Response to TEO Period Products Consultation

September 2023

Contact:
Elaine Crory
Women's Sector Lobbyist
elaine.crory@wrda.net

1. Introduction:

The Women's Policy Group (WPG) is a group of policy experts and practitioners who advocate collectively for women and girls by promoting gender equality through an intersectional feminist lens. We challenge systemic injustice and discrimination affecting women and girls by informing society and influencing policy and law. Our work is informed by women and girls' lived experiences and rooted in international human rights law.

The WPG 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 is endorsed as a coalition of expert voices that advocates for women in Northern Ireland on a policy level.

If you have any questions or queries about this response, or would like to discuss this evidence further with the WPG, please contact Elaine Crory, Women's Sector Lobbyist at elaine.croy@wrda.net

This response was prepared by the following WPG members:

- Elaine Crory – Women's Resource and Development Agency
- Aoife Mallon - Women's Resource and Development Agency
- Siobhán Harding - Women's Support Network
- Bethany Moore - Foyle Women's Information Network
- Caoimhe McNeill - UNISON

Please note that this response also includes evidence from other WPG work, compiled by a range of WPG members, and not all member organisations have specific policy positions on all the areas covered in this response.

1.1 Endorsements

The WPG would like to endorse the response submitted to this call for evidence by Women's Regional Consortium, Unison NI.

2. Past Consultations Responses, Evidence Submissions and Briefings:

The WPG has published a wide range of evidence through various evidence submissions, public consultation responses and specific briefings on issues relating

to period poverty. Responses made by the WPG, and some of our members, in relation to these issues include:

- WPG Response to Period Products Bill Consultation (December 2021) Available [here](#)¹
- WRDA Response to PMB on Period Poverty (January 2021) Available [here](#).²
- WPG Response to Dept for the Economy's consultation on a Circular Economy Strategy (March 2023) Available [here](#)³.

2.1. Content from previous WPG Responses

In our response to the Period Products Bill, back in 2021, we raised the following key points.

Disclaimer: Whilst period poverty is a gendered issue that predominantly 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.

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. 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

¹ WPG NI (2021) WPG Response to Period Products (Free Provision) Bill. Available at: <https://wrda.net/wp-content/uploads/2021/12/WPG-Response-to-Period-Products-Bill-Consultation-Dec-21.pdf>

² WRDA (2021) WRDA Response to Period Products PMB. Available at: <https://wrda.net/wp-content/uploads/2021/01/WRDA-Period-Poverty-PMB-Survey-Response-Jan-2021.pdf>

³ WPG NI (2023) WPG Response to Dept for Economy consultation on a Circular Economy Strategy. Available at: <https://wrda.net/wp-content/uploads/2023/03/WPG-Response-to-Circular-Economy-Consultation-final.pdf>

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, 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 work. 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.

3. General Comments on the Period Products Consultation

With regard to the questions in this survey around reusable period products, and in line with the ongoing development of a Circular Economy Strategy for Northern Ireland, we reiterate again our support for moving towards reusable products and reducing waste where possible. There is a need to help people move to reusable options where possible by helping them to try sustainable options without spending money up-front that they cannot spare, a financial risk that many may be unwilling or unable to afford to take. There are examples of schemes like this in operation in Northern Ireland already, for example the reusable period products giveaway, run by Belfast City Council, which allowed any resident in Belfast to choose between reusable products to try and was enormously successful in its pilot year and is now running again⁴. This should be scaled up to cover all of Northern Ireland and will require creative thinking to ensure that everyone who wants to avail of this scheme can do so. Ideally, it would be expanded also to cover alternative reusable products, beyond those covered in the existing scheme. In addition, it would benefit from being attached to an incentivising voucher, such as the scheme also operated by Belfast City Council to incentivise the use of cloth nappies for newborns, which includes a voucher scheme to help people move from trying free products to choosing them exclusively⁵. Whether operated centrally by TEO or outsourced to Councils, this provision should be available to all residents of Northern Ireland who may need it, regardless of the area they live in. This option involves receiving the package in the post, and as such is a levelling approach for those who may live some distance from a town or city that may have a pick-up place. It is therefore a good model to draw from and replicate. Note also that this model does not require recipients to pay for postage and packing.

With regard to the questions in this survey around locations at which people should be able to access period products, due concern should be paid to the opportunity presented to address stigma and to educate the public, as outlined above in section 2.1. In addition, practicality must be considered; period products will be used in the bathroom or toilet cubicle, and when a person needs the products with a degree of urgency, they should be able to access them swiftly and in a dignified way. Both

⁴ 8 Belfast City Council 2023

<https://www.belfastcity.gov.uk/news/reusable-period-product-giveaway-returns-after-pil#:~:text=pilot%20in%202022.-A%20free%20reusable%20period%20product%20giveaway%20has%20returned%20once%20again.%2C%20plastic%2Dfree%20period%20products>

⁵ Belfast City Council <https://www.belfastcity.gov.uk/clothingnappyscheme>

approaches should be and can be explored together. Requiring users to ask at a reception desk, or similar, is not an appropriate approach, however. It may have the effect of removing accessibility at times that the desk is not occupied, increasing stigma by keeping the products hidden, requiring trans men to “out” themselves as people who menstruate, and also carries the implication that users are not to be trusted to use the service responsibly. Signage at a reception desk, or similar, notifying users of the building as to the location of the products, would be ideal. Products kept at reception to re-stock bathrooms as needed, however, is a good idea.

We also urge that this provision include men’s toilets, in order to include trans men, non-binary people who prefer to use the men’s toilets, and indeed cis men who are accessing the products for women and girls in their family etc. We also urge that provision include accessible toilets and Changing Places toilets, to ensure that people with disabilities can have dignified periods. Priority should be given to equipping homeless shelters and public toilets with products so that unhoused people can access the products when they are needed.

4. Response to Consultation Questions

Consultation Questions:

About You:

Are you responding as an individual or on behalf of an organisation? If responding on behalf of an organisation, please tell us your organisation’s name in the space below.

Tick:	Local Council Area:
	Individual
X	On behalf of an organisation

Women’s Policy Group Northern Ireland.

1. ***Where do you live:***

Tick:	Local Council Area:
	Antrim and Newtownabbey Borough Council
	Ards and North Down Borough Council
	Armagh City, Banbridge and Craigavon Borough Council
	Belfast City Council
	Causeway Coast and Glens Borough Council
	Derry City and Strabane District Council
	Fermanagh and Omagh District Council
	Lisburn and Castlereagh City Council
	Mid and East Antrim Borough Council
	Mid Ulster District Council
	Newry, Mourne and Down District Council
X	Other

1a. If you selected "Other" please provide further detail in the space below:

WPG is a collective of organisations based across all of Northern Ireland, with organisations based in multiple Council areas and with membership spanning all Council areas, as many of the organisations involved are membership organisations. WRDA, the secretariat of the WPG, is based in Belfast but is a regional membership organisation.

2. What is your postcode? This is to identify the general location of respondents.

First 3/4 digits of Postcode only:
(e.g., BT1)

BT7 (But a regional organisation)

- 3. In order to make sure we are asking a broad section of the community for their views, please tell us a bit more about yourself. Please tick all that apply.**

(Please note this information will remain anonymous and be treated as such. If answering on behalf of an organisation, please tick all that apply to your members.)

Tick all that apply:	About You:
	I currently use period products.
	I will need to use period products in the future.
	I am a mother, sister, partner, or family member of someone who needs access to period products.
	I am a father, brother, partner, or family member of someone who needs access to period products.
	I do not need period products for myself, but for someone who does, who is not a family member.
	I prefer not to answer this question.
X	Other

- 3a. If you selected "Other" please provide further detail in the space below:**

As a collective of organisations we are made up of, and working on behalf of, people who currently use period products, who have used them in the past, who will use them in the future and who have family and loved ones who have used, do use and will use period products.

- 4. Would you use free period products if they were available?**

Tick:	Answer:
X	Yes
	No

5. What, if anything, would STOP you from accessing these free period products?

(Please tick all that apply.) Please remember that these products will be available for everyone whether or not they can afford to purchase them themselves.

Tick all that apply:	Answer:
	Being too embarrassed.
	If I don't know where I can get them.
	Can't get to the physical locations where free products may be provided? <i>(Please provide further detail below. This may be related to transport issues, mobility issues, issues around insufficient disabled access, etc)</i>
	For cultural or religious reasons <i>(please provide further detail below.)</i>
	I would prefer to purchase my own choice of products.
	Nothing would stop me.
X	Other.

5a. If you selected “can't get to the physical location”, “for cultural or religious reasons” or “Other” please provide further detail in the space below.

In responding to this consultation we are responding not as individuals who may face these barriers, but on behalf of our members who experience multiple barriers. These barriers include stigma, which can lead to individuals feeling uncomfortable or embarrassed about accessing period products. This issue will be especially relevant for trans men or non-binary people who may not wish to draw attention to the fact that they menstruate, but will also include young people who are new to the experience, and those whose families and/or communities are uncomfortable speaking openly about periods. For this reason access should be spread as widely as possible and the products need to be in all bathrooms, not just those designed for women and girls, so that trans and non-binary people can access them where and when they need them.

It will also be difficult for some to physically access places where the products are available. Northern Ireland has a disproportionately rural population, and so many

people are far from these locations, and if they are experiencing period poverty they may find the cost of travel to access the products means that the cost outweighs the benefit. For this reason, ensuring a truly wide spread of the locations where these products are available is vital.

For cultural reasons it is also vital to make sure all types of products are available; some religious people and some people with specific health conditions cannot use certain types of products. We encourage venues that host free period products to ensure that this variety of products is checked on regularly and certain types are stocked up when needed; failure to do so inadvertently excludes some people from the provisions of this initiative. Signage should be available in the bathrooms to inform users about who to contact should certain products that they need be missing from the bathroom.

Please note that wherever period products are provided, they may be used, and therefore a serviced sanitary bin must be available on site.

6. Who would you be prepared to collect the free period products for? (Please tick all that apply).

Tick all that apply:	Who:
	Myself
	Another person in household
	Another person not in my household.
	I would not be prepared to collect for someone else.
X	Other.

6a. If you selected “Other” please provide further detail in the space below:

Again we are speaking as an organisation and not as individuals, but these products should be accessible by anyone for the use of anyone who needs them. This is another reason why they should be available in bathrooms intended for all genders; as well as serving the needs of trans men, it will also allow cisgender men to access products for family members and loved ones who may need them.

In terms of the possibility of having reusable products sent to people’s homes, it is important not to screen on the basis of perceived or actual gender as it will prevent trans men, cis fathers of daughters and others who may not be seen as obviously in need of accessing the products for themselves.

**7. What free period products do you think should be available?
(Please tick all that apply.)**

Tick all that apply:	Product:
X	Pads
X	Applicator Tampons
X	Non applicator Tampons
X	Panty Liners
X	Reusable Period pants
X	Reusable Menstrual cups
X	Reusable pads
X	Reusable panty liners
	Other

7a. If you selected “Other” please provide further detail in the space below:

All of the above should be available as all are necessary to meet the needs of the variety of people in our society who need to use these products. As stated in response to 5a above, some people will not be able to use certain products for religious, cultural or medical reasons, and so all options should be available - failure to do so would exclude some people from this scheme by default. With that said, some products will inevitably prove more popular than others, and as such efforts should be made to ensure that stock is checked and replenished as needed.

The WPG supports the use of reusable period products where possible and we are eager to use this opportunity to stress the value of enabling those people who want to try reusable products to try them and use them habitually. This will significantly reduce the quantities of waste sent to landfill, and therefore reduce the costs for Councils in handling waste. It will also positively contribute to the goals of creating a Circular Economy in Northern Ireland. To those ends it is vital that reusable products are included in this scheme. We recognise that the cost of providing these is higher than the cost of providing disposable period products, with the proviso that the cost

is an investment that will pay off doubly; both in terms of generating less waste and the fact that they will not need replaced nearly as often as disposable items.

**8. How important or unimportant are reusable products to you?
(Please tick one space only.)**

Tick one:	Importance:
X	Very important
	Quite important
	Not very important
	Not at all important

9. Reusable products are more expensive. Alternative arrangements may be required to access these products. Would you be prepared to provide your contact details in order to obtain them?

Tick:	Answer
X	Yes
	No

**10. How do you think period products ought to be made available?
(Please tick all that apply)**

Tick all that apply:	How:
X	Collect in person from a physical location as required.
X	Delivery. (You may be required to provide your contact details and may be required to pay costs associated with packing & delivery)

X	An online or text pre order “click and collect” style service
	Other

10a. If you selected “Other” please provide further detail in the space below:

The WPG believes that as many options as possible be made available, to encourage uptake and to make it as accessible and easy as possible for people to move to reusable products should these be suitable for their needs.

However, with regard to the delivery option, this may be the only option accessible to those living in very rural areas, and as such it should not cost money as this presents an unequal barrier to rural people who already face access poverty and who may be dissuaded from trying renewable products for this reason.

11. In terms of physical locations where do you think would be the best places to obtain free period products from? (Please tick all that apply).

(Please note: Schools are not included in this list as they are not accessible by the general public and provision is already made for those in schools by the Department of Education.)

(“All toilets” are not included as an option as it is anticipated that the budget which will be made available will not be sufficient to meet this option.)

Tick all that apply:	Location:
X	Public Libraries
X	Public buildings <i>(Please provide further detail in the space below)</i>
X	Museums / Cultural spaces
X	Community venues <i>(Please provide further detail in the space below)</i>
	Other

	(Please provide further detail in the space below)
--	--

11a. If you have selected “Public buildings”, “Community venues” or “Other” please provide further detail and/or examples in the space below.

In terms of public buildings we recommend including GP surgeries, Jobs & Benefits offices and leisure centres.

In terms of GP surgeries we suggest operating a service a little like many of the existing models to renew prescriptions, whether via an app or over the telephone, people can renew prescriptions without the need to see their GP, but can simply collect the script from the reception desk when it is ready. In the same way, GP surgeries could function as a collection point for period products for their registered patients. Jobs and Benefits offices are an ideal location as they are often sites where people who experience poverty generally - and period poverty is of course a function of poverty - are obliged to be on a regular basis. Leisure centres will facilitate easy use by members of the public.

In terms of community venues, we recommend supplying these products to all women’s centres as standard; these venues serve as a vital community asset that serves women of all backgrounds and identities, but particularly those who are most at risk of experiencing poverty and deprivation. Sure Start centres are also a natural place for the products to be available; operating mostly in areas of heightened deprivation, they serve women with babies and children who may be experiencing poverty and whose children are at an age where their lives are often limited to their home and the local community, with little time to visit cultural venues or leisure centres. This serves the principle of siting these products at the place of greatest need, first.

Please note that wherever period products are provided, they may be used, and therefore a serviced sanitary bin must be available in the same toilet..

12. Given the legislation indicates that the provision of free period products must respect privacy, dignity, and confidentiality where within a building would you feel most comfortable accessing Free Period Products? (Please tick all that apply.)

Tick all that apply:	Location:
X	In the toilets of relevant buildings

X	At the reception area.
	In a discreet location within the building.
	On a display stand in the building.
	Other.
	Don't have a preference.

12a: If you selected "Other" please provide further detail in the space below:

In terms of the option "in the toilets of the relevant buildings", the WPG argues that they should be placed in the cubicles themselves. This is both for practical reasons - that's where you are when you discover you need them urgently, and leaving them openly on the counter next to the sinks may cause them to get wet and be rendered unusable - but also because it is the most discreet option available for those who may feel embarrassment and for trans or non-binary people who may not want to "out" themselves in front of others in the bathroom.

Again we stress that these products should also be available in men's bathrooms so that trans men can access them, and in accessible and Changing Places bathrooms. A sanitary bin should be provided. We also recommend visible signage to let people know that the building provides sanitary products, and a sign visible in bathrooms alerting members of the public as to who they should contact in the event of a shortage of period products. In terms of the option to keep products in the reception area, this may be appropriate as long as the products are visible and accessible and do not need to be requested, or as "spare" items in the event of a shortage arising.

13. How do you think the provision and location of free period products should be publicised? (Please tick all that apply.)

Tick all that apply:	Answer:
X	NI Direct website
X	Dedicated App showing the locations of free period products.
X	Local media (e.g., local newspapers, local radio, etc)

X	Social media
X	Prominently displayed within the relevant location supplying the products
	Other – please provide more information.

13a: If you selected “Other” above please provide further detail in the space below:

We recommend all of the above, but advertising should also be wider than social media and websites because while that will reach many, we know from our work that a lot of people still rely on more traditional media. For this reason we recommend widening the spread of advertising to include; newspapers, including local newspapers; radio, including local radio; advertising around public transport including on buses and trains and at bus shelters and train stations; posters and/or leaflets in places like GP surgeries, libraries, Jobs and Benefits Offices, and leisure centres.

14. If the locations of products were to be provided via an app how likely or not likely are you to use this app?

Tick one:	Likelihood:
X	Very likely
	Somewhat likely
	Not very likely
	Not at all likely

15. Some groups (such as those from certain cultural backgrounds, those with a disability, those who are homeless, etc.) are likely to have certain specific needs when accessing free period products. Please provide any further information you think is relevant or should be taken into account to meet the needs of such groups in the space below.

It is certainly the case that this provision must be mindful of those groups within society who have particular needs with regards to period products.

For this reason it is vital to include accessible toilets and changing places toilets in the scheme, and to ensure that they are properly stocked with a variety of products. Assumptions must not be made as to which products are best, although some people may be restricted in choice as they may have dexterity issues that mean that only some products are usable. Again, all such toilets should have sanitary bins provided, and signage indicating who to contact in the event that provisions have run out.

With regards to people of different cultural backgrounds, again it is important not to make assumptions, but we know that some religions prohibit products that require insertion into the body, therefore a variety of products should be available to meet all needs.

With regards to homeless people, we support the work of Menstruation Matters in this area and we urge TEO to make sure that homeless charities have access to the products and also things like wipes and clean underwear. Public toilets that are accessible without having to be a customer of a particular business are especially likely to be used by people who do not have a house and private bathroom, and they are therefore essential to the success of this scheme.

Impact assessments:

- 16. A number of impact assessment screening exercises have been carried out and are listed separately here www.executiveoffice-ni.gov.uk/consultations/consultation-free-period-products. If you have any additional comments or information please provide further detail in the space below.**

We recognise the effort that TEO has put into conducting such extensive impact assessments. The WPG greatly appreciates that these were conducted to such a standard. We would like to see all Departments undertake such a commitment to impact assessments for all future consultations.

With regards to the Section 75 Screening, it should be noted that some of the positive impacts are in fact major, despite being listed as minor. It is evident, looking at the impact of free period product provision in Scotland, that this firmly contributes to gender equality in a major way. This should not be overlooked or underrepresented; it marks this Scheme out as particularly positive.

Survey responses from those who had accessed free period products in Scotland highlights that:

- 87% of young people who responded felt they were less likely to worry about their periods when they had access to free period products.
- 85% of those who struggled to afford period products agreed that access to free period products made a positive impact on their household finances.
- 77% of all respondents felt that provision of free period products made them more able to continue with their day-to-day activities.

Therefore, it is evident that access to free period products positively impacts the majority of people who menstruate (particularly young people and those in low income households).

The WPG also recommends that TEO utilise this opportunity to have a major positive impact on trans and non-binary people and people with disabilities. Ensuring accessible toilets and men's toilets also have access to free period products is essential to guarantee that free period products can be accessed by *all* those who need them.

Any other comments / feedback:

17. Please provide any further comments and / or feedback you wish to make in relation to the provision of free period products in the space below.

We acknowledge that at present TEO, like all NI Government Departments, are experiencing budget constraints. Despite this, we are hopeful that the stringent budget we are operating under won't impact the roll out. This piece of work has the potential to contribute enormously to the goal of alleviating period poverty, but it will also increase women's participation in public life, the freedom of trans and non-binary people to use public spaces, and better provision for people with disabilities. All of these things contribute to the wellbeing of the residents of Northern Ireland, both directly and indirectly. The normalisation of these products, by their visibility, will also contribute to ending stigma around menstruation in particular, but around the health and bodies of women and those assigned female at birth in general. Finally, while we know that work has progressed on an Anti-Poverty Strategy for Northern Ireland, it has not yet been completed and approved. While we are eager to see the Assembly restored, Ministers in place and the Strategy implemented, in the interim anything that can be done to mitigate poverty - particularly the disproportionate poverty experienced by women - is to be welcomed and encouraged.

5. Additional Comments

The Women's Policy Group again reiterates our support of the legislation that led to this consultation, the possibilities for advancing gender equality, LGBT+ equality and more that are presented by this scheme, and the thorough and careful EQIA process which included a Rural Needs and Human Rights impact assessment too. All of this work and the vision it serves are to be commended.

We once again urge TEO to ensure to include accessible toilets, Changing Places toilets and men's toilets as well as to make a special effort to reach the homeless with the necessary equipment to have a dignified period while unhoused. Doing this will fulfil the full potential of the Scheme, the Act that led to it, and the grassroots movement that inspired the Act.

ENDS

For any questions or queries relating to this submission, please contact:

- Elaine Crory, Women's Sector Lobbyist at WRDA: elaine.croory@wrda.net or
- Aoife Mallon, Women's Sector Lobbyist Policy Assistant at WRDA: aoife.mallon@wrda.net