

Women's **Policy Group NI**

WPG NI Response to TEO EVAWG Draft Strategic Framework

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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.croory@wrda.net.

This response was prepared by the following WPG members:

- Elaine Crory – Women's Resource and Development Agency & Raise Your Voice
- Aoife Mallon - Women's Resource and Development Agency
- Karen Devlin - Women's Aid Federation NI
- Siobhán Harding - Women's Support Network
- Clare Moore - Irish Congress of Trade Unions (ICTU)
- Bethany Moore - Foyle Women's Information Network
- Jonna Monaghan - Women's Platform
- Caoimhe McNeill - UNISON Northern Ireland
- Danielle Roberts - Reclaim the Agenda
- Karen Sweeney - Rape Crisis NI
- Sophie Nelson - Here NI
- Becca Bor - Northern Ireland Anti-Poverty Network (NIAPN)
- Catherine Barr and Rayna Downey - Women's Centre Derry
- Jacqui McLoughlin - Women's Forum NI
- Alexa Moore - NI Human Rights Consortium
- Dr. Kellie Turtle – Ulster University

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 responses submitted to this call for evidence by Women's Aid Federation Northern Ireland (WAFNI), Women's Platform, Women's Regional Consortium, ICTU and 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 Violence Against Women and Girls (VAWG). Responses made by the WPG, and some of our members, in relation to these issues include:

Primary Research:

- WPG NI Primary Research (2023) into VAWG in Northern Ireland (Attitudes and Reporting VAWG)¹
- WPG NI Primary Research (2022) into VAWG in Northern Ireland (Scope, scale and prevalence of VAWG)²
- WPG NI Primary Research (2021) on the impact of the pandemic on women and girls in Northern Ireland³

TEO Consultation Responses:

- WPG NI (2022) Response to Joint Call for Views: New Strategies: Domestic and Sexual Abuse Strategy (DOJ, DOH) Violence Against Women and Girls Strategy (TEO)⁴
- WPG NI (2023) Response to TEO Ending VAWG: Experiences and Attitudes of 16-year-olds in Northern Ireland report – Readership Survey⁵

¹ <https://wrda.net/wp-content/uploads/2023/09/AfterViolenceWPGPrimaryResearch.pdf>

² <https://wrda.net/wp-content/uploads/2022/04/WPG-VAWG-Research-Report.pdf>

³ <https://wrda.net/wp-content/uploads/2021/07/WPG-Feminist-Recovery-Plan-Research-Report-Womens-Voices-at-the-Core.pdf>

⁴ <https://wrda.net/wp-content/uploads/2022/03/WPG-Response-to-Call-for-Views-New-Strategies-Domestic-and-Sexual-Abuse-and-VAWG-Mar-22.pdf>

⁵ <https://wrda.net/wp-content/uploads/2023/04/WPG-Response-TEO-VAWG-Research-Report.pdf>

Other Consultation Responses:

- WPG NI (2023) Response to Westminster Women & Equalities Committee Inquiry into the Escalation of VAWG⁶
- WPG NI (2021) Response to Protection from Stalking Bill⁷
- WPG NI (2023) Response to the Department of Justice (DoJ)/ Department of Health (DoH) Draft Domestic and Sexual Abuse Strategy⁸
- WPG NI (2021) Written evidence submission and oral evidence presentation on DoJ Justice (Sexual Exploitation and Trafficking Bill) ⁹
- WPG NI (2022) Response to Home Affairs Inquiry into Spiking¹⁰
- WPG NI (2021) Submission on the Safe Leave Bill¹¹,
- WPG NI (2021) Submission to Justice Committee on Fatal and Non-Fatal Strangulation¹²,
- WPG NI (2021) Briefing on Treating Misogyny as a Statutory Aggravator in the Hate Crime Review¹³,
- WPG NI (2020) Evidence submission to the Committee on the Domestic Abuse and Civil Proceedings Bill¹⁴.
- WPG NI (2020) Response to the Independent Hate Crime Legislation Review Consultation¹⁵,
- WPG NI (2021) Response to the Department of Justice Public Consultation on Enhancing Legal Protections for Victims of Domestic Abuse¹⁶,

⁶ <https://wrda.net/wp-content/uploads/2023/09/WPG-response-to-Westminster-Enquiry-on-Escalation-of-VAWG.pdf>

⁷ <https://wrda.net/wp-content/uploads/2021/04/WPG-Joint-Submission-Protection-from-Stalking-Bill-16-04-2021.pdf>

⁸ <https://wrda.net/wp-content/uploads/2023/05/WPG-Response-to-DSA-Strategy-.pdf>

⁹ WPG Justice (Sexual Exploitation and Trafficking Bill) written evidence submission and oral evidence presentation: <https://wrda.net/wp-content/uploads/2021/09/WPG-Written-Evidence-Submission-to-Justice-Sexual-Exploitation-and-Trafficking-Victims-Bill-24-September-2021-1.pdf>

¹⁰ WPG Response to Home Affairs Committee into Inquiry into Spiking (2022): <https://wrda.net/wp-content/uploads/2022/01/WPG-response-to-Spiking-Inquiry.pdf>

¹¹ WPG Response to Safe Leave Bill (2021): <https://wrda.net/wp-content/uploads/2021/12/WPG-Response-to-Safe-Leave-Bill-Dec-21.pdf>

¹² WPG Response to Non-fatal Strangulation Public Consultation (2021): <https://wrda.net/wp-content/uploads/2021/09/WPG-response-to-NFS.docx.pdf>

¹³ WPG Response to Department of Justice Response to Hate Crime Review (2021): <https://wrda.net/wp-content/uploads/2021/12/WPG-Summary-Response-to-DoJ-Response-to-Hate-Crime-Review-Dec-2021-.pdf>

¹⁴ WPG Evidence Submission to Justice Committee (2020) Domestic Abuse and Family Proceedings Bill: <https://wrda.net/wp-content/uploads/2020/06/WPG-NI-Evidence-Submission-to-Justice-Committee-05.06.20.pdf>

¹⁵ WPG (April 2020) Hate Crime Legislation Independent Review Consultation Response: <https://wrda.net/wp-content/uploads/2020/12/WPG-Hate-Crime-Consultation-Review-Response-30.04.20-Updated.pdf>

¹⁶ WPG (February 2021) Response to DOJ Consultation on Enhancing Legal Protections for Victims of Domestic Abuse: <https://wrda.net/wp-content/uploads/2021/02/WPG-Response-on-Enhancing-Legal-Protections-for-Victims-of-Domestic-Abuse-Public-Consultation.pdf>

- WPG NI (2021) Response to Private Members' Bill Consultation on Paid Domestic Abuse Leave¹⁷,
- WPG NI (2021) Response to Department of Justice Public Consultation on Consent to Harm for Sexual Gratification: Not a Defence¹⁸

Briefings:

- WPG NI Briefings to MLAs on the rise in domestic abuse in the beginning of the COVID-19 pandemic¹⁹,
- WPG NI Call for increased funding for domestic abuse support providers²⁰,
- WPG NI Call for the urgent implementation of a Violence Against Women and Girls Strategy and broader measures to tackle gender-based violence in the WPG COVID-19 Feminist Recovery Plan²¹,
- Summary briefing on WPG NI Feminist Recovery Plan Webinar analysing the rising levels of violence against women throughout COVID-19²²,
- WPG NI Feminist Recovery Plan Key Briefing on Gender Based Violence²³,

2.1 Content from previous responses

The WPG NI has been lobbying and advocating on issues relating to VAWG for several years. In each of these previous consultation responses, primary research reports, evidence submissions and key briefings, our arguments have remained consistent in highlighting the following key points:

1. Violence against women and girls (VAWG) is highly prevalent in our society
2. The vast majority of violence faced by women and girls is perpetrated by men

¹⁷ WPG (January 2021) Response to Private Members' Bill on Paid Leave for Victims of Domestic Abuse: <https://wrda.net/wp-content/uploads/2021/01/WPG-Response-to-PMB-Consultation-Paid-Domestic-Abuse-Leave-Jan-21.pdf>

¹⁸ WPG (January 2021) Response to DOJ Consultation on Consent to Serious Harm for Sexual Gratification - Not a Defence: <https://wrda.net/wp-content/uploads/2021/01/Consent-to-harm-for-sexual-gratification-not-a-defence-by-WPG.pdf>

¹⁹ WPG Statement on the Gendered Impact of COVID-19 and Domestic Abuse (April 2020): <https://wrda.net/2020/03/26/statement-by-the-womens-policy-group-on-the-gendered-impact-of-covid-19/>

²⁰ WPG Call for Emergency Funding for Domestic Violence and Sexual Health (May 2020): <https://wrda.net/wp-content/uploads/2020/06/WPG-Letter-Emergency-Domestic-Violence-Funding-.pdf>

²¹ WPG COVID-19 Feminist Recovery Plan (July 2020): <https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>

²² WPG Feminist Recovery Plan Webinar Series - COVID-19 and Violence Against Women (in collaboration with Women's Aid and Raise Your Voice) summary briefing available here: <https://wrda.net/wp-content/uploads/2020/11/VAWwebinarsummary.pdf>; and recording available here: <https://wrda.net/wp-content/uploads/2020/11/VAWwebinar.mp4>

²³ WPG (April 2021) Feminist Recovery Plan Key Briefing on Gender Based Violence: <https://wrda.net/wp-content/uploads/2021/04/WPG-FRP-Gender-Based-Violence-Key-Briefing.pdf>

3. Acts of VAWG are gendered in nature and are underpinned and motivated by attitudes of misogyny and sexism
4. In order to eradicate VAWG in our society, these root causes and underlying attitudes must be addressed
5. The prevalence and severity of VAWG in Northern Ireland limits women's ability to equally participate in all aspects of life, including employment, public life, sports and education.

The WPG welcome this Draft Strategic Framework on EVAWG as it shows a clear recognition of these facts and provides a roadmap towards eradicating VAWG in our society. The WPG look forward to continuing to work with the Department on taking an evidence-based approach to tackling issues relating to VAWG and making Northern Ireland a safer place for all women and girls.

2.2 WPG Primary Research Findings

The WPG NI have carried out a number of research projects in the past three years that relate specifically to the prevalence, scope and aftermath of VAWG. These include:

- WPG Protection from Stalking Bill written evidence submission and oral evidence presentation²⁴ April 2021
- Violence Against Women & Girls in Northern Ireland: Women's Policy Group NI Research Findings²⁵, April 2022
- After Violence: Attitudes & Reporting VAWG²⁶, September 2023

The purpose of this research is both to ensure that recommendations that we make are informed by the lived experience of women we work with and for, and also to ensure that the experience of women in Northern Ireland, which has a different legislative landscape as well as a different social landscape, scarred by decades of conflict, is heard in Westminster.

Northern Ireland's Executive Office (TEO) is presently in the process of consulting on the first Ending Violence Against Women & Girls Strategy. While other UK jurisdictions have had these in place for years, Northern Ireland is behind once again, and indeed

²⁴ WPG Joint Submission to Protection from Stalking Bill (2021): <https://wrda.net/wp-content/uploads/2021/04/WPG-Joint-Submission-Protection-from-Stalking-Bill-16-04-2021.pdf>

²⁵ Women's Policy Group NI, Violence Against Women & Girls Research Findings (2022) Available at: <https://wrda.net/wp-content/uploads/2022/04/WPG-VAWG-Research-Report.pdf>

²⁶ Women's Policy Group NI, After Violence: Attitudes and Reporting VAWG, Key Findings briefing (2023) Available at: <https://wrda.net/wp-content/uploads/2023/09/AfterViolenceWPGPrimaryResearch.pdf>

presently does not have a Government in place, meaning that if the Strategy consultation is completed, there are no Ministers in place to sign it off, and no funds allocated towards its implementation.

Meanwhile, Northern Ireland occupies an unenviable position in comparison with our nearest neighbours and across Europe with regards to femicide; PSNI statistics show 8 women were murdered with a domestic abuse motivation in the period July 2021-June 2023²⁷; Women's Aid's data indicates that 39 women have died violently in Northern Ireland since 2017²⁸, with evidence indicating that Northern Ireland has one of the highest femicide rates in Europe²⁹. In addition, reported domestic abuse incidents and crimes continues to rise, as does reported sexual offences including rape.

Some data from WPG primary research on stalking in Northern Ireland has been summarised below.

2.2.1 WPG Research on Stalking

In the WPG's 2021 Research to inform our response to the Protection from Stalking Bill, women spoke about their experiences of reporting stalking behaviours before adequate laws existed to prosecute the crime, including attitudes from police, and the impact on their wellbeing. The following are some key findings:

When asked: If you wish to, please detail your stalking experience(s) In response to this question, the vast majority of respondents disclosed their relationship to their stalker(s).

Throughout these responses, 79% of respondents identified their stalker as either an ex-partner or someone they had previously dated. A further 23.7% referenced being stalked by an acquaintance or a "friend of a friend" and 10.5% also referenced being stalked at school, or by someone they knew from school several years previously. 18.4% of respondents also referenced being stalked by a stranger or random person; 2.6% referenced being stalked by an employer and 2.6% referenced being stalked by a colleague.

In addition to this, 52.6% of respondents referenced being stalked at their home; 31.6% being stalked at their workplace; and 10.5% referenced being stalked at school or

²⁷ Police Service of Northern Ireland (July 2023) [Police Recorded Crime Bulletin](#).

²⁸ BBC Northern Ireland 14 June 2023 ['Claire Hanna: MP highlights 'devastating impact' of attacks on women'](#)

²⁹ Factcheck NI (November 2019) [Does Northern Ireland have the highest femicide rate in Western Europe?](#)

university. A worrying 47.4% of respondents referenced being physically followed by their stalker, with 23.7% being followed by a car.

Several respondents also experienced unwanted phone calls, texts and emails (47.4%); online harassment (21.1%) and unwanted gifts (7.9%). Worryingly, 10.5% of respondents also mentioned concerns over the unstable mental health of their stalkers, with references to ex partners threatening suicide also.

The most universal theme in these experiences was the reported serious long term impacts on survivors. 100% of respondents listed long term impacts on their mental health because of their experiences, from those cases where the harassment was ongoing to those where it had ended decades before. Three respondents specifically mentioned living with PTSD as a result. Some feared for their physical safety, others suffered damage to their career.

Other key themes include:

- The coexistence of in-person and digital stalking
- The prevalence of individuals experiencing stalking by more than one perpetrator
- The rise of Image Based Sexual Abuse (IBSA) also known as “revenge porn”
- The connection between perpetrators perceived “sense of entitlement” and their behaviour, and how gaps in the law enable this
- Confusion over how best to deal with the issue
- A wide variety of responses from institutions including the police, justice system, educational establishments and workplaces

When asked: Did you report any stalking incident you experienced?

- 52.63% of respondents said – Yes
- 47.37% of respondents said - No

When asked: If you reported this, who did you report it to (for example, police, employer, teacher etc.)? Out of the respondents that did report the stalking:

- 42.1% reported it to the PSNI,
- 7.89% reported this to their friends, family or neighbours,
- 7.89% reported to their employers,
- 5.26% of respondents referenced reporting it and receiving support from Women’s Aid,
- 5.26% reported it to their GP,
- 5.26% reported it to a solicitor,
- 2.63% reported it to their university and,

- 63% went as far as reporting it to the perpetrators' family.

Some of the other key themes that emerged in response to this question included:

- Reports to agencies coming quite late into the pattern of behaviour, because of a mixture of fear of disbelief, embarrassment, a hope it would “all go away”, and taking some time to realise what was happening,
- Employers putting practical supports in place at a higher rate than Universities or Schools,
- Family members being forced to provide practical help where police did not,
- Reports happening only when necessity has forced them.

2.2.2 WPG Research on the Scale and Prevalence of VAWG

In the 2022 WPG Research project on Violence Against Women and Girls, 1,065 women told us their experiences and perceptions of the issue, including of the response from the police. The following are some key findings:

- **91.2%** of women think that Northern Ireland has a problem with men's violence against women and girls.
- **97.2%** of women think that Northern Ireland should have a strategy to tackle men's violence against women and girls.
- **83%** of women have been impacted by men's violence against women and girls but only **21.4%** reported this to the police
- **77.4%** of women who reported men's violence to the police did not find it useful.
- **82%** of women first experienced men's violence before the age of 20.
- **89.7%** of women believe Northern Ireland has a problem with attitudes of sexism and misogyny.
- **80.8%** of women believe Northern Ireland has a problem with rape myths and rape culture
- **87.4%** of women believe Northern Ireland has a problem with victim-blaming
- **81.2%** of women believe there is stigma surrounding issues of violence against women and girls.
- **92.3%** of women think that there are barriers to reporting men's violence against women and girls.
- **95.2%** of women think that reducing levels of violence against women and girls requires focusing on changing men and boys' behaviours and actions.
- **78.6%** of women think that additional action needs to be taken in this strategy to address men's violence against marginalised groups of women.

- **86.8%** of women think that there needs to be a review of how the justice system treats victims and survivors of men's violence against women and girls.
- **83.4%** of women believe that state violence against women and girls should be included within this Strategy.

2.2.3 WPG Research on the State's Response to VAWG

In 2023, the WPG carried out further research on VAWG, titled 'After Violence: Attitudes and Reporting VAWG' which specifically looked at the experiences of victims with the police and justice system after experiencing VAWG.

Experiences of violence

- 87% of women have experienced VAWG
- 80% of women disclosed their experience of VAWG to someone
- 60% of disclosures of VAWG were made to a friend or family member

Police Reporting

- Only 27% of disclosures of VAWG were to the police
- 46% of women know how to report an incident of VAWG to the police
- Only 22% of women feel comfortable reporting VAWG to the police
- 85% of women think there should be a specific mechanism for reporting VAWG to the police

Court system

- Only 9% of women think that courts in NI take VAWG seriously
- 31.5% of women who have experienced VAWG engaged with the court system
- 54.5% of women who engaged with the courts were not satisfied with the outcome Alternative forms of justice
- 77% of women think convicted offenders of VAWG should take part in a rehabilitation program
- 61% of women were unsure if mediation and other forms of alternative justice are working

Domestic Abuse

- 65% of respondents have experienced domestic abuse
- 67% of women who have experienced domestic abuse did not report it to the police or take legal action
- 63% of domestic abuse victims who reported it to the police or took legal action said that this was a negative experience

3. General Comments on the Ending Violence Against Women & Girls (EVAWG) Strategic Framework Consultation

3.1 Introductory remarks

The WPG welcomes this opportunity to respond to this public consultation on the TEO EVAWG Strategic Framework. Several WPG members were involved in the co-design process for the EVAWG Strategy and are immensely proud of the Draft Strategic Framework that has come out of that process. The WPG would like to commend the TEO EVAWG Team for all of the hard work and dedication that went into making this Draft Strategic Framework as strong as it is and congratulate them on facilitating such a positive and rewarding co-design experience.

It is welcome that TEO has acknowledged that the foundations of VAWG rests on an unequal, skewed social order that keeps inequality alive and deepens it across generations. The state is and has been a major contributor to that inequality, and as such the WPG's earlier research into VAWG included State Violence as a category³⁰. This encompasses a range of behaviours, ranging from the denial of rights, for example reproductive rights, to explicit violence such as Mother and Baby Homes, and to fiscal violence, that keeps women at a permanent financial disadvantage, enabling the violence of individuals.

3.2 Women's Economic Disadvantage

Gendered social norms restrict and limit women's roles in the economy, thereby contributing to women's economic disadvantage relative to men³¹. Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work and also more likely to be providing care either for children or other family members which limits their ability to carry out paid work. This contributes to keeping women's incomes generally lower over their lifetimes and therefore means they are more likely to be dependent on men or the State through social security benefits. This lack of economic independence can make women more vulnerable to gender based violence.

The social security system has a vital role to play in easing the impact of poverty on people and families. However, welfare reform and austerity measures have tended to limit the ability of the system to protect against poverty³². Many of these changes have

³⁰ Women's Policy Group NI, VAWG Research Report, 2022, p.62-63 Available at: <https://wrda.net/wp-content/uploads/2022/04/WPG-VAWG-Research-Report.pdf>

³¹ Violence against Women and Girls and women's economic inequality, Eva Neitzert, March 2020, <https://wbg.org.uk/wp-content/uploads/2020/07/Violence-and-womens-economic-equality.pdf>

³² Protecting dignity, fighting poverty and promoting social inclusion in devolved social security, Dr Mark Simpson, Ulster University, June 2018

had more negative impacts on women than men. The House of Commons Library reported that 86% of the savings to the Treasury from the tax and benefit changes since 2010 will have come from women³³. Locally an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)³⁴ showed that across most income levels the overall cash impact of the reforms is more negative for women than for men.

Women and girls who live in poverty are more likely to live in areas which are unsafe, are less likely to be able to access education to enhance their job prospects and are more likely to work in low-paid, low-quality jobs which can increase their risk of being subjected to abuse and violence. Poverty can also undermine their voice in being able to challenge this violence at work and in wider society.

Research by the Women's Regional Consortium on the impact of austerity³⁵ and on the impact of Universal Credit³⁶ on women shows the extent to which changes to the social security system have worsened their ability to provide for their children and families and made them more vulnerable to financial hardship and poverty. Poverty is one of the main risk factors for violence against women and girls and with the social security system increasingly not providing a reliable safety net, women's vulnerability to violence is heightened.

Addressing women's disadvantage in the economy requires action to ensure that women are able to be economically independent not only through paid work but also through a properly supportive social security system which provides a safety net when women are not able to work. This should include ensuring that benefits are set at a level that enables women and families to afford to live free from poverty including the removal of gendered welfare reform policies such as the Benefit Cap and the two-child limit.

http://www.niassembly.gov.uk/globalassets/documents/raise/knowledge_exchange/briefing_papers/series_7/simpson060618.pdf

³³ Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017

<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

³⁴ Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019. https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

³⁵ Impact of Ongoing Austerity: Women's Perspectives, Women's Regional Consortium, March 2019 <http://www.womensregionalconsortiumni.org.uk/sites/default/files/Impact%20of%20Ongoing%20Austerity%20Women%27s%20Perspectives.pdf>

³⁶ The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020 <http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

3.2.1 Debt and Paramilitary Lending

Low-income households are more likely to have to rely on high-cost credit as they are often unable to access cheaper forms of borrowing due to their low-income and/or other debts. Some of the most vulnerable borrowers are forced into using illegal lending or 'loan sharking' because of a more urgent need for money. In Northern Ireland illegal lending is often linked with perceived paramilitary activity³⁷. Information from the Police Service of Northern Ireland (PSNI) suggests that paramilitary groups (both Loyalist and Republican) continue to be involved in illegal money lending/loan sharking however it is rarely reported to the police³⁸. This is a hugely difficult area to gather statistics or evidence on as it is often a hidden form of borrowing due to the underlying fear and secrecy surrounding this type of credit.

Research by the Women's Regional Consortium³⁹[9] with local women in Northern Ireland showed a number of examples of borrowing through loan sharks including paramilitaries. It revealed that 6% of the women who took part in the research had borrowed through illegal lenders such as loan sharks including paramilitaries. Women were more reluctant to talk about this type of lending as they understood it is a more dangerous form of borrowing and many were too afraid to discuss it at all. There was a general acceptance among the women that the consequences of this type of borrowing could be very scary.

Research⁴⁰ has noted that there is a continued reluctance within communities in Northern Ireland to speak to the authorities about this type of lending due to fears that they could be labelled an 'informer' and therefore invite reprisals. This was echoed in Women's Regional Consortium research⁴¹ which also found that those who borrowed from these lenders were reluctant to be seen to be 'touts'.

³⁷ Expensive Lending in Northern Ireland, Centre for Economic Empowerment, NICVA, May 2013 https://www.nicva.org/sites/default/files/d7content/attachments-resources/cee_expensive_lending_in_northern_ireland_2013.pdf

³⁸ Annual Report & Threat Assessment 2020/21, Organised Crime Task Force, February 2022. <https://www.octf.gov.uk/files/octf/2022-02/octf-annual-report-and-threat-assessment-2020-21.pdf>

³⁹ Making Ends Meet: Women's Perspectives on Access to Lending, Women's Regional Consortium, February 2020. <https://womensregionalconsortiumni.org.uk/wp-content/uploads/2021/04/Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf>

⁴⁰ Illegal Money Lending and Debt Project, Research Report of Findings, Ulster University and the Consumer Council, March 2020. https://www.consumerCouncil.org.uk/sites/default/files/2020-07/Illegal_Money_Lending_Report.PDF

⁴¹ Making Ends Meet: Women's Perspectives on Access to Lending, Women's Regional Consortium, February 2020. <https://womensregionalconsortiumni.org.uk/wp-content/uploads/2021/04/Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf>

Research by the University of Ulster found that Universal Credit was repeatedly described as a driver for illegal lending⁴² particularly around the harm caused by the five-week wait and issues with short-term benefits loans that were repaid from future benefits.

Funding cuts across Departments as a result of a constrained Budget imposed by the Secretary of State has seen reductions in important areas of help including Discretionary Support. Discretionary Support provides help through the social security system for those with extreme, exceptional or crisis situations and it has essentially seen its funding cut in half from last year in the midst of a Cost-of-Living Crisis. Statistics show that 67% of those in receipt of Discretionary Support Grants are women.

Reducing access to this important source of crisis help for those on the lowest incomes will only serve to drive the most vulnerable households to expensive and sometimes dangerous forms of lending. While Discretionary Support alone cannot solve the problem of illegal lending it provides an important source of borrowing for those on the lowest incomes and can help to divert people from illegal lending such as paramilitaries.

There are a range of external factors which can drive people to use paramilitary lending as well as other forms of illegal lending including the impact of a constrained Budget for Northern Ireland, welfare reform/austerity policies and cost of living increases. The impact of all these issues coming together has helped to create a perfect storm where those on the lowest incomes are struggling to make ends meet and are therefore more likely to be driven towards this type of lending as they are unlikely to be able to source the money they need elsewhere.

In light of all the concerns detailed above we believe the potential for harm is greater particularly for women who are generally on lower-incomes and who may need to access crisis help to make ends meet. This leaves them more vulnerable to abuse and violence particularly if they are forced into using illegal and paramilitary lenders.

“I have heard of drug dealers lending money locally. They lend people they know are regular customers.”

“When you borrow money from these dodgy lenders you will never get it paid off – they know you are vulnerable.”

⁴² Illegal Money Lending and Debt Project, Research Report of Findings, Ulster University and the Consumer Council, March 2020. https://www.consumerCouncil.org.uk/sites/default/files/2020-07/Illegal_Money_Lending_Report.PDF

“My friend is a single mother and she was approached by an illegal money lender offering her a job. She was told to approach her friends and family and offer them loans. She offered me a loan but I said no. They will give you £500 and you have to give back £600 but it had to be repaid in a month. I warned her about this as she doesn’t know what will happen if they can’t pay it back. My nerves couldn’t take it.”

“I’ve been to a loan shark – it’s not good. The interest they put on. If you miss a payment they are at your door – you don’t miss those payments.”

“If you don’t pay back you get your windows put in first. I heard a local woman got her windows put in for not paying back a loan.”

“You get your knees done if you don’t repay – there are so many things they can do.”

“If you can’t get a bank loan, a Credit Union loan because you have to have savings, or payday loans then after that it’s paramilitaries.”

3.2.2 Women and the Cost-of-Living Crisis

Women are more likely to be affected by economic crises and the Cost-of-Living Crisis is no different. As women’s incomes are generally lower over their lifetimes, often as the result of caring responsibilities, a greater likelihood of working part-time and of being in receipt of social security benefits, they have less protection against these crises. A decade of welfare reform and austerity policies which have hit women harder have caused many women on the lowest incomes to cut back and cut back until they can cut back no further.

Then they have been hit by the Cost-of-Living Crisis which has seen inflation hit double figures and steep rises in the costs of the most basic items. This is really concerning for those on the lowest incomes who spend a greater proportion of their household budgets on food and energy the prices of which are rising so fast.

Research by the Women’s Regional Consortium on the impact of the Cost-of-Living Crisis on women⁴³ has shown the following:

- 96% of women felt their financial situation was worse than it was the previous year;
- 91% of women reported difficulty paying their bills as a result of Cost-of-Living increases;

⁴³ Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, Women’s Regional Consortium, June 2023. <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

- 90% of the women felt that the Cost-of-Living Crisis had impacted on their physical or mental health or both;
- 78% of the women had felt cold or hungry or both as a result of cost of living increases;
- Just over half of the women reported being in debt (56%) and of these 82% reported they had to borrow as a result of Cost-of-Living increases;
- 41% had needed to use a foodbank/other charitable support due to increases in the cost of living.

Women are often described as the ‘shock absorbers’ of poverty in the home, going without food, clothes and warmth to protect their children and other family members when money is tight. This poverty and financial hardship is very often unseen yet limits women’s lives, their ability to contribute to society and to reach their full potential.

The following quotes taken from the research illustrate the depth of the Cost-of-Living Crisis for women and how seriously their household budgets are being impacted by rising prices leaving them more vulnerable to poverty, financial hardship, abuse and violence.

“I am now scraping along to provide food and keep a roof over mine and my child’s heads. The cost to survive is atrocious.”

“It’s the everyday basics that you need to get yourself through. It’s essential to have toilet roll so you’ve no choice but to buy it. It’s not luxuries it’s the things people need to live and survive that are going up so much.”

“Heat, electricity and food, the things you need to survive are literally like luxuries now. You’re having to make decisions if my child wants to eat and be warm what am I going to have to do without?”

“I used to be able to save. I used to have a couple of hundred pounds in a tin upstairs for emergency or if the car broke down or if I needed to buy a new washing machine. I always liked to have £500 in the tin for an emergency. I can’t afford that anymore I just don’t have it.”

“Women are usually the ones who manage the finances. They have to make things stretch. I know things I used to get that were a wee treat - now those things are gone. You’re cutting back on every wee thing you can now.”

3.2.3 Embedding Gender Budgeting

The relationship between gendered economic inequality and VAWG highlighted in this section provides evidence of the need for a strong budgetary response to be

embedded in the EVAWG Strategy. Gender budgeting is a mechanism to bring about gender-equal change by examining the resources allocated to policy proposals, and their potential effects on women and men. It seeks to redistribute resources in a way that redresses imbalances in women and men's use of, access to and benefit from public services and finances.⁴⁴ It has been described as the application of gender mainstreaming in budgetary processes and involves auditing the impact of public spending to look for gender differentiated outcomes. This gendered analysis should then lead to spending decisions that specifically address gender inequality with targeted, redistributive measures.

Governance and policy making in Northern Ireland has been found to take place within an institutional culture that favours gender neutral approaches and a reliance on the avoidance of discrimination, rather than engaging fully with pre-existing gender inequalities and taking a proactive approach to addressing them.⁴⁵ However, targeted policy like the EVAWG Strategy represents a welcome deviation from this norm as it focuses on the causes and consequences of VAWG as a gendered issue. Such an approach has the potential to be a transformative mechanism for real improvement in the lives of women and girls, but only if it is accompanied by a redistributive approach to resource allocation. Gender budgeting is key to ensuring that the EVAWG strategic framework achieves its full potential. Further explanation of the importance of gender budgeting is outlined under question 16 which addresses Outcome 6 of the strategic framework. In summary, the following elements are key to supporting the delivery of this important policy through gender budgeting:

- the policy aims and actions must be adequately resourced by the responsible departments;
- cross-departmental working is essential to address the causes and consequences of VAWG holistically and with shared responsibility for tackling the economic disadvantage women and girls experience;
- the gendered impact of other relevant areas of social and economic policy must be audited and actions taken to ensure they do not undermine the aims of the EVAWG strategic framework.

3.3 Implementing international human rights standards

The international law framework, including the Istanbul Convention as well as CEDAW, the Convention on the Rights of the Child (UNCRC), the Convention on the

⁴⁴ Jubeto, Y. (2010) Proposal to the EU Institutions on the added value of Gender-Based Analysis in the budgetary policy: Equality between Women and Men as a Basis for Growth and Employment. Informal Meeting of Ministers for Gender Equality, 25-26 March 2010, Valencia, Spain

⁴⁵ Ballantine, J., Rouse, M., Gray, A.M. and Turtle, K. (2023) Working Paper 3: Gender Audit of the Programme for Government. Available at: https://www.ark.ac.uk/ARK/sites/default/files/2023-03/Gender_Budgeting-3.pdf

Elimination of All Forms of Racial Discrimination (CERD) and the Convention on the Rights of People with Disabilities (CRPD), all provide a clear mandate for effective strategies and judicial remedies to be put in place to tackle men's violence against women and girls. It is particularly vital that the strategies are in line with the Istanbul Convention, and with any recommendations arising from the ongoing baseline assessment, as UK action in this field is a current focus for GREVIO, which monitors the Istanbul Convention.

The Istanbul Convention holds that all state actors are obliged to conform to the requirements of the Convention. Key among these are requirements to implement effective legislation to protect women and girls from violence, ensure adequate resourcing for action, and implement gender sensitive policies. Importantly, the Convention emphasises data collection as the basis of action, and stresses the role on meaningful data in prevention. It also mandates work with men and boys to change cultures, attitudes and behaviours, and provides detailed guidance on development of judicial systems and responses⁴⁶. The Council of Europe has also recently published guidance on education for prevention under the Istanbul Convention, which emphasises gender equality and non violent approaches, and provides examples of good practice from a number of countries as well as a checklist for developing national good practice⁴⁷.

CEDAW General Recommendation 35⁴⁸ specifically focuses on gender based violence, and provides guidance on interpretation and implementation of CEDAW in this regard. The CEDAW Committee holds that 'Women's right to a life free from gender-based violence is indivisible from and interdependent on other human rights, including the rights to life, health, liberty and security of the person, equality and equal protection within the family, freedom from torture, cruel, inhumane or degrading treatment, and freedom of expression, movement, participation, assembly and association'⁴⁹. The Recommendation explicitly includes psychological, sexual, economic and physical harm as well as threats of such acts, harassment, coercion and arbitrary deprivation of liberty in its scope of gender based violence.

The Recommendation clarifies the CEDAW provisions and states that laws prohibiting gender based violence should include sanctions for perpetrators and reparations for victims.⁵⁰ It further notes that 'all legal procedures in cases involving allegations of gender-based violence against women are impartial, fair and unaffected by gender

⁴⁶ Council of Europe (2011). [Convention on preventing and combating violence against women and domestic violence](#)

⁴⁷ Council of Europe (March 2022) [Preventing violence against women through formal and informal education: Article 14 of the Istanbul Convention](#)

⁴⁸ CEDAW Committee (67th session, 2017) [General Recommendation 35 on gender based violence against women](#)

⁴⁹ Ibidem, p. 6

⁵⁰ Ibidem, p. 10.

stereotypes or the discriminatory interpretation of legal provisions, including international law', and that capacity building is required to ensure that women's right to equality is not affected by the application of preconceived and stereotyped notions of what gender based violence is, how women do and should react and the standard of proof required in proceedings⁵¹.

It is worth noting also that, when considering domestic implementation of international human rights law frameworks, or when attempting to reflect them in public policy, the Yogyakarta Principles plus 10 (YP+10)⁵² as well as the original Yogyakarta Principles⁵³ provide an essential understanding of the key principles and state obligations stemming from these international frameworks as they apply to the rights of LGBTQI+ persons. For local strategies and human rights frameworks to be fully cognisant and inclusive of LGBTQI+ communities, they must build in consideration of how these Principles apply locally, while moving towards full domestic implementation of the YP and YP+10 alongside other international treaties in a Northern Ireland Bill of Rights.

3.3.1 Compliance with CEDAW

WPG member organisation Women's Platform would urge for CEDAW to be recognised as an international obligation of the UK⁵⁴ that provides the framework for effective action on gender equality; ideally, CEDAW should be incorporated in domestic law, as recommendations from several Concluding Observations state. Indeed we would take this opportunity to note that two paragraphs of CEDAW recommendations, around abortion access, comprehensive RSE and combatting gender stereotype have been incorporated into Westminster Legislation, however these commitments have not been fully delivered⁵⁵. At a minimum, CEDAW recommendations should inform policy and decision making, to ensure the UK remains in line with international law and good practice on gender equality.

In short, CEDAW requires States Parties to implement a rights based agenda that ensures legislation, policies and programmes are non discriminatory and focus on progressive realisation of equal rights for all. The Concluding Observations provide a roadmap for progressing gender equality, and the most recent set of

⁵¹ Ibidem, p.11

⁵² [The Yogyakarta Principles plus 10](#): Additional Principles and State Obligations on the Application of International Human Rights Law in Relation to Sexual Orientation, Gender Identity, Gender Expression and Sex Characteristics to Complement the Yogyakarta Principles

⁵³ [The Yogyakarta Principles](#): Principles on the Application of International Human Rights Law in Relation to Sexual Orientation and Gender Identity

⁵⁴ [Convention on the Elimination of All Forms of Discrimination against Women](#) (CEDAW, 1979), articles 1 and 2. The UK signed the Convention in 1981 and ratified in 1986.

⁵⁵ NI Executive Formation Act, 2019. <https://www.legislation.gov.uk/ukpga/2019/22/section/9/enacted>

recommendations emphasises access to justice and support for victims and survivors, as well as increasing action on prevention and culture change.

Importantly, CEDAW covers action on abuse and violence in same sex relationships, gendered violence perpetrated against trans and non binary people, as well as encouraging action to support Black and racialised/minoritised women, including refugee, asylum seeking and undocumented women. Due to various hostile environment policies, including “no recourse to public funds” (NDPF) and the requirement for public bodies such as the police to act as immigration enforcement, racialised women who experience misogynistic violence face specific barriers in reporting violence and seeking support, which may be compounded by cultural and language differences as well as previous traumatic experiences creating mistrust in authorities.

Recognising CEDAW would also create effective links across Departments and strategies, which helpfully can act as a mechanism for creating a coherent framework for addressing violence against women and girls, and also enable foreign and domestic policy coherence, which in turn will enable positive initiatives developed as part of overseas aid schemes to be reflected domestically. This, in turn, is vital, as the critical message of this response is that gender based violence is a result and expression of gender inequality and patriarchal norms, and cannot be sustainably addressed in isolation.

4. Response to Consultation Questions

1. Are you responding to this consultation as a member of the public, or on behalf of an organisation?

On behalf of an organisation.

8. Please provide the name of the organisation you are answering on behalf of.

Women’s Policy Group NI.

9. Which of the following best describes the sector you operate in? This will assist us in monitoring the range of respondents the consultation has reached.

Charity / Community / Voluntary sector.

Strategic Framework

The Strategic Framework to End Violence Against Women and Girls is the blueprint for society wide change to tackle this systemic problem.

10. Do you agree or disagree with our vision?

"A changed society where women and girls are free from all forms of gender-based violence, abuse and harm including the attitudes, systems and structural inequalities that cause them." Please select only one option.

☒ Strongly Agree

☐ Agree

☐ Neither Agree nor Disagree

☐ Disagree

☐ Strongly Disagree

Please add any comments you wish to make regarding our draft vision in the box below.

The Women's Policy Group NI believe that this vision is optimistic but also very welcome; it sets out a vision for a fully changed society, which is what is required to address the scale of the problem. The mention of structural inequalities that underlie the prevalence of VAWG in our society is also very welcome. It is vital that the Strategy that flows from this work recognises that the harms of gender-based violence are both enabled by a society in which inequality is entrenched and where patriarchy is the norm, and also contributes actively to perpetuating those norms. Any meaningful effort to address them must start from this point.

We also must reiterate that the gendered nature of the problem of VAWG must be fully understood. This phenomenon describes violence that happens to women and girls *because* they are women and girls - misogyny is the driver, and structural inequalities are the enabler. This is not to say that men and boys do not experience violence, but that they do not experience violence *because* they are men and boys.

In addition, we need actions, resources and the full support of the Executive to fall behind this Strategy to ensure its success. Failure to do so would be to waste the opportunity presented here. The WPG are extremely concerned at the continued absence of an Executive since the most recent Stormont collapse. It is crucial that the Executive is restored as soon as possible to oversee the successful implementation of this ambitious Strategy.

What is Gender-based violence?

11. Do you agree or disagree that Outcome 1 below, will enable us to achieve this draft vision?

Outcome 1 - Changed Attitudes, Behaviours and Social Norms.

Everyone in society understands what violence against women and girls is, including its root causes, and plays an active role in preventing it.

Please add any comments you wish to make regarding Outcome 1 in the box below. Please select only one option:

☒ Strongly Agree

☐ Agree

☐ Neither Agree nor Disagree

☐ Disagree

☐ Strongly Disagree

Again we note that this is an ambitious but welcome Outcome that we fully support.

It will be a challenge in Northern Ireland, which is a relatively socially conservative society, to bring everyone along with us on the necessary journey to achieve this Outcome. As such, we have a number of suggestions as to how to avoid some pitfalls that have been seen in previous campaigns relating to VAWG.

It is vital not to focus on things that women and girls can or “should” do to protect themselves or keep themselves safe. Paternalistic campaigns have been run in the past⁵⁶ that do not help victims, do not avoid incidents of violence, that actively blame the victim and do nothing to challenge the underlying issues, avoiding any engagement with or focus on would-be perpetrators. These kinds of messages are both unhelpful and actively alienating, and are likely to discourage survivors from contacting police. These messages also run the risk of increasing women’s distrust of police, that already exists in Northern Ireland, as evidenced by extensive primary research by WPG and other groups. Any other authority or public body, such as a Department, adopting similar language or relying on similar thinking would likely experience similar outcomes.

⁵⁶ BBC News, PSNI Officers shared “victim-blaming” rape leaflets in error, 21st September 2021. Available at: <https://www.bbc.co.uk/news/uk-northern-ireland-foyle-west-58621849>

With regards to language, our 2022 report on VAWG used the term “men’s violence against women and girls” because we were concerned with the common practice of using terminology that leaves the perpetrator out of the equation - this is also a view shared by Jackson Katz in his work on gender-based violence,⁵⁷ inspired by the feminist linguist Julia Penelope. The spectrum of harm known in this Strategy as “violence against women and girls” must not be routinely spoken of as though it is a perpetrator-less phenomenon, or be discussed passively, as though it is an illness that women are simply more prone to than men.

It is people who carry out the harms associated with VAWG, and these people are overwhelmingly men. It is not a natural occurrence and it does not have to be this way. The Vision for this Strategy seems to broadly concur with the views of the WPG, that structural inequalities play a role in allowing this violence to happen in plain sight, but in seeking, finally, to change how society views the violence itself, we must seek also to change how society sees the perpetrators of this harm. This does not mean “blaming all men” for the actions of some men, but it does mean an honest look at the gendered nature of the problem in order to properly understand and directly address the root causes. This will also require direct work with men of all ages and with boys that addresses some of the harmful beliefs that may be harboured even if they do not lead to overt violence, as well as the culture that allows these harms to be excused, covered up, and overlooked.

At the same time, caution must be exercised when speaking about this issue so that LGBTQ+ people, who may experience violence within same-sex relationships, or those women and girls who experience violence from other women, are not excluded. Although LGBTQ+ women experience disproportionate violence from men, because the spectrum of VAWG is far greater than that of domestic abuse alone, efforts must be made to serve the needs of these women - both in public messaging and in terms of service delivery. We will return to this theme in response to Q. 14.

12. Do you agree or disagree that Outcome 2 below, will enable us to achieve this draft vision?

Outcome 2 – Healthy, Respectful Relationships.

Everyone in society is equipped and empowered to enjoy healthy, respectful relationships.

Please select only one option

⁵⁷ Jackson Katz “Violence against women - it’s a men’s issue” Available at: <https://www.youtube.com/watch?v=KTvSfeCRxe8>

☒ Strongly Agree

☐ Agree

☐ Neither Agree nor Disagree

☐ Disagree

☐ Strongly Disagree

Please add any comments you wish to make regarding Outcome 2 in the box below.

We agree that encouraging healthy, respectful relationships is the cornerstone of achieving this Vision, as well as a good end in and of itself. As such, Relationships and Sexuality Education (RSE) is absolutely vital to achieving this end. It is particularly important that a new curriculum for Relationships and Sexuality Education is fully inclusive of LGBTQI+ relationships and family structures, provides evidence-based information about consent and healthy sex/relationships, while also being fully accessible to all those young people who need it.

The WPG welcomed and continues to support the action taken by the Secretary of State for Northern Ireland in June to compel the Department of Education to ensure that the RSE curriculum is updated to include basic information on reproductive health, contraception and abortion, as well as to include more on healthy relationships in all their variety and expressions. Organisations within the WPG have campaigned for a long time to change the Minimum Content Order in order to include these topics. We are disappointed, however, that RSE reform was recommended by the UN CEDAW Review in 2018 and legislated for by Westminster in 2019⁵⁸, but is yet to be implemented in Northern Ireland. It took too long for the UK Government to act on this, and in the gap created by that delay, the atmosphere that encourages such misinformation was created.

The WPG has serious reservations about the proposed provision to allow parents to opt their children out of some parts of the curriculum. Children have rights with regards to the quality of education they receive, and we have concerns that this allows other people - albeit their parents - a veto over those rights. From the point of view of preventing violence against women and girls, this kind of education needs to begin from an early age, and to advance at an age appropriate level throughout the educational period. In addition, it needs to reach everyone to be truly effective.

⁵⁸ [Northern Ireland \(Executive Formation\) Act 2019 - Abortion etc: Implementation of CEDAW Recommendations](#)

At present, there are widespread misinformation campaigns⁵⁹ spreading through schools and in online spaces, which vary in tone, but share the goal of undermining the RSE provision that the Department of Education is working on and consulting on at present. The outcome of these campaigns may be that a large number of children are excluded from the full RSE curriculum on the wishes of their parents, as well as the proliferation of harmful myths about the alleged dangers of RSE⁶⁰, and the harms that this may cause are significant - both for children and their future partners. As the stewards of this Strategy, It is important that TEO take seriously the insidious threat posed by these misinformation campaigns, as they pose a direct risk to the successful implementation of the Strategy, if allowed to continue.

Although schools play a primary role in encouraging healthy relationships, and having conversations relating to RSE, it is not purely the preserve of schools and formal education to have these conversations. It is equally important that youth clubs and other places where young people may receive informal education are equipped to handle these topics, in addition to educational environments for adults. Some workplaces, for example, regularly train staff on matters related to VAWG, although this training is not universal.

While some universities run excellent programmes, this depends on the institution and even on the year. Learning never stops throughout the life course, and a truly changed society would recognise this and facilitate learning on this vital topic at every life stage and in every venue, particularly in environments that tend to be single-sex in practice, such as sporting clubs for adults. Ideally, this Strategy would explicitly include the need to work with all of these kinds of settings and allow every opportunity possible to engage with these topics and learn new, better attitudes, expectations and behaviours. The more these kinds of programmes are mainstreamed and normalised, the easier it will be for everyone to access them, and the sooner healthy relationships will become the norm.

13. Do you agree or disagree that Outcome 3 below, will enable us to achieve this draft vision?

Outcome 3 – Women and Girls Are Safe and Feel Safe Everywhere.

⁵⁹ Fact Check NI, RSE in Northern Ireland: What's Happening? 14th August 2023. Available at: <https://factcheckni.org/articles/relationships-and-sexuality-education-rse-in-northern-ireland-whats-happening/>

⁶⁰ Fact Check NI, Does easier access to abortion and contraception lead to an increase in domestic abuse and sexual violence? 22nd September 2023, Available at: <https://factcheckni.org/articles/does-easier-access-to-abortion-and-contraception-lead-to-an-increase-in-domestic-abuse-and-sexual-violence/>

Organisations and institutions across government and society embed the prevention of violence against women and girls in all that they do so that women and girls are safe and feel safe everywhere.

Please select only one option.

☒ Strongly Agree

☐ Agree

☐ Neither Agree nor Disagree

☐ Disagree

☐ Strongly Disagree

Please add any comments you wish to make regarding Outcome 3 in the box below.

The WPG agrees that this is an ambitious but welcome outcome to strive towards. We particularly welcome the clarification around the need both to feel safe and to be safe, as these are not the same thing and both separate but related goals should be key objectives of this Strategy.

In terms of creating a safe place, this includes the environment that we inhabit as well as the people with whom we share the world. In seeking to create a safe place to live, it is vital that we have safe streets and public places, with newly built areas designed with women's lives and safety in mind and adjustments made to existing urban and rural landscapes to incorporate safe public space, good transport links and a gendered lens applied to planning so as to include safety features such as adequate street lighting. This kind of work is actively undermined by some of the cost-saving measures proposed by our own government departments in the current financial crisis, including proposed rolling back of the over 60s SmartPass, and the proposal to turn off streetlights across Northern Ireland in January 2024.

At a time when efforts are being made to improve and to address the long neglect of women and girls' safety, these kinds of budgetary decisions should immediately raise warning signs and be screened out. The fact that they are not, and have been allowed to be rolled out, is a concern shared across the organisations working on this response. This is a theme that we will return to in response to Q. 16.

While the safety - or lack of safety - for women who engage with the justice system will be explored in detail in response to Q. 15, there are other branches of the state that women interact with, which sometimes provide frontline services in VAWG cases, and

which can also perpetuate further harm in practice. For this reason organisations like social services, the family courts and the organs of the state that deal with welfare and benefits, must be equipped to do what they do in a way that does not engage in victim blaming or gaslighting in the first instance, or actively worsen the problem and make it harder for survivors to escape abusive or controlling relationships, or drive them to enter harmful situations.

In the case of some of the cuts to discretionary support, there is reason to believe that this will actively endanger women by leaving few options for financial support and therefore contributing to risky borrowing from paramilitary lenders or loan sharks⁶¹. In addition, the shortage of public housing is leading to long waiting lists, creating bottlenecks for those who escape abuse and live in refuge, but are ready to move on, and for those in private housing who cannot afford to make rent alone and so cannot afford to leave an abuser. For these reasons, the housing crisis and the waiting lists are a women's safety issue, and an integrated approach to this issue must be taken across all government departments.

This philosophy and approach should also be extended beyond explicitly frontline services. Northern Ireland should learn from the experience of other countries and see how to make all kinds of spaces and places more safe for women and girls, including, for example, public transport. Initiatives could be taken by Translink to draw attention to the issue of sexual harassment on public transport, training drivers and inspectors on what to do if there is an issue, providing information to the public about the availability of on-board CCTV and what to do when an incident occurs.

Similarly, initiatives could be taken in venues such as bars and clubs to make the night-time economy safer, for example, by training door staff, bar staff and taxi drivers on signs of spiking and bystander interventions. A whole-society approach could transform the experience of public life for women and girls, and investment and encouragement from TEO and all government Departments could help to drive this.

It is vital to remember, when designing services or updating those that we already have, that there is no “one size fits all” approach to helping people feel, or be, safe. For some survivors, only specialist services that are sensitive to their particular situation will be enough, for example specialist workers within the PSNI who could work with LGBTQI+ survivors and allay fears that they may be “outed” or disbelieved because of their sexual orientation. At a very basic level, buildings and rooms must be accessible for those with disabilities, translators must be available for those who need them, and an intersectional approach to service provision must be taken so that all of these

⁶¹ Making Ends Meet: Women's Perspectives on Access to Lending, Women's Regional Consortium, February 2020. <https://womensregionalconsortiumni.org.uk/wp-content/uploads/2021/04/Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf>

things are available all of the time, to meet the needs of those people who face barriers on multiple grounds.

Finally, while we welcome the ambition of this Strategy and of this particular outcome, safety in public and private spaces is the very least we should expect. It is testament to the degree to which we have failed women and girls until now that basic safety seems ambitious. It will take a significant effort to realise the ambitions of this Strategic Framework, and if we do so we may return to future Strategies with greater ambitions to allow for wellbeing and thriving.

14. Do you agree or disagree that Outcome 4 below, will enable us to achieve this draft vision?

Outcome 4 – Quality Frontline Services, Protection, and Provision for Victims and Survivors of Violence Against Women and Girls.

Provision of high quality services for women and girls who are victims and survivors of violence against women and girls.

Please select only one option

☒ Strongly Agree

☐ Agree

☐ Neither Agree nor Disagree

☐ Disagree

☐ Strongly Disagree

Please add any comments you wish to make regarding Outcome 4 in the box below.

Quality frontline services should be both the expectation and the reality for women and girls who need to access the services.

The reality is falling short, in practice. Women's Aid's services are presently vastly overstretched and have been for some time, and cuts to core grants will worsen the situation. As of the end of September 2023, Women's Aid have lost their core funding from the Department of Health, as a result of the 2023 Budget cuts. Long term, ring-fenced funding is vital to enable this specialist work to continue, particularly where there is evidence that greater specialism is needed, for instance in providing services to women with substance abuse issues within refuge or in accessing outreach. Other

key services, due to cuts in core funding, are scaling back on, for example, childcare workers, when the scale of need means that they ought to be scaling upwards. It is not enough to recognise the value, in principle, of these services, this value must translate into adequate resourcing to ensure the survival of these vital services.

On the issue of specialist services, there is a need for the development of “by and for” services designed to reach more marginalised women who may be reluctant to access more mainstream services. This includes specialisms that have been recently lost, such as the specialist worker within the LGBTQI+ sector, and extends beyond this to meet a need that we know is present - for example services with cultural specialisms who can reach racially minoritised women, and specialist staff within the disability sector, particularly since we know that women with disabilities suffer disproportionate rates of domestic abuse and coercive control.

Meanwhile, services for survivors of sexual violence are wholly inadequate and insufficient. Rape Crisis NI is presently a part-time phone line run by volunteers and lacks any kind of core funding. Demand for its services is high but it cannot expand to meet demand without investment and core funding. Counselling services provided by Nexus are overstretched and the waiting lists are too long. Frontline services also means more than the provision put in place specifically for survivors, it includes those services in society that a person may report or disclose to, and there is an absence of training for these bodies to ensure that they are equipped to handle these issues properly.

Examples of the kinds of services that need this expertise include; GPs, nurses in GP surgeries, A&E staff, paramedics, church leaders (priests, ministers, rabbis, imams, etc), teachers and school staff, and of course police. We are aware that some work began on this as part of the Gillen Review recommendations, but it is presently stalled due to a lack of resources. This kind of work can be transformative for survivors and it needs and deserves a funding resource.

15. Do you agree or disagree that Outcome 5 below, will enable us to achieve this draft vision?

Outcome 5 – A Justice System which has the Confidence of Victims, Survivors and the Public in its Ability to Address Violence Against Women and Girls.

In the context of violence against women and girls, a justice system that considers and addresses the needs of people who come into contact with it, holds perpetrators to account, while challenging and supporting them to change, gives victims and survivors a voice and a place in the process, and has the confidence of the public.

Please select only one option:

☒ Strongly Agree

☐ Agree

☐ Neither Agree nor Disagree

☐ Disagree

☐ Strongly Disagree

Please add any comments you wish to make regarding Outcome 5 in the box below.

The WPG shares this goal but we have considerable concerns about how much work needs to be done in order to reach a place where this is a reality. These concerns are based on research we have carried out and on focus group inputs.

The Women's Policy Group has conducted two pieces of primary research into violence against women and girls in Northern Ireland between 2022 and 2023. Findings from both pieces of research clearly show that women and girls have limited confidence in the justice system and police when it comes to reporting and seeking support after experiencing violence. Some of the key findings from this research relating to reporting and experiences with the justice system include the following.

WPG Primary Research into VAWG in Northern Ireland (2022)⁶² found that:

- 83% of women have been impacted by men's violence against women and girls
- Only 21.4% of victims reported this to the police.
- 77% of women who reported violence to the police did not find it useful.
- 92% of women think that there are barriers to reporting men's violence against women and girls.
- The five most common barriers cited by respondents included:
 - Concerns about not being believed
 - Fear about being stigmatised or judged
 - Shame
 - Victim-blaming
 - Stigma
- Other common responses included:
 - Lack of prosecution
 - Lack of support thorough legal and justices systems
 - Threat of more violence

⁶² <https://wrda.net/wp-content/uploads/2022/04/WPG-VAWG-Research-Report.pdf>

- 87% of women think that there needs to be a review of how the justice system treats victims and survivors of men's violence against women and girls.

WPG Primary Research on 'After Violence: Attitudes and Reporting VAWG' (2023)⁶³ found that:

- 87% of women had experienced a form of VAWG
- Only 9% of women think that courts in NI take VAWG seriously
- 31.5% of women who have experienced VAWG engaged with the court system
- 54.5% of women who engaged with the courts were not satisfied with the outcome
- 77% of women think convicted offenders of VAWG should take part in a rehabilitation program
- 61% of women were unsure if mediation and other forms of alternative justice are working
- Only 27% of women who had experienced VAWG disclosed this experience to the police
- 60% of disclosures of VAWG were made to a friend or family member
- 46% of women know how to report an incident of VAWG to the police
- Only 22% of women feel comfortable reporting VAWG to the police
- 85% of women think there should be a specific mechanism for reporting VAWG to the police
- 67% of women who have experienced domestic abuse did not report it to the police or take legal action
- 63% of domestic abuse victims who reported it to the police or took legal action said that this was a negative experience

With these findings considered, it is not surprising that a lack of faith in the justice system is so common as to be the default view, both among women who responded to our research, and in focus groups. In particular, participants reflected that the justice system is incapable of handling serial perpetrators or those with very ingrained views rooted in misogyny, and that it is neither adequately holding perpetrators to account nor supporting them to change so that their offending is not repeated.

Trust in policing and the ability and willingness to report experiences of violence also varies dramatically across different communities/demographics of women. This is particularly true for migrant and refugee women who may be subject to 'hostile environment' policies, which the PSNI enforce, for transgender women and women in sex work. Whether through perceived or experienced discrimination or bias, these groups of women often find it even more difficult to trust in and interact with the justice system for fear of further victimisation.

⁶³ <https://wrda.net/wp-content/uploads/2023/09/AfterViolenceWPGPrimaryResearch.pdf>

In addition there are issues of lengthy, unacceptable delays, poor communication about case progress, varying and occasionally hostile attitudes from police and victim blaming at every stage of the legal process for those who do report to the PSNI and persist with the justice system until the process completes. Many of these issues, particularly around delays and victim-blaming, were addressed in the Gillen Review and recommendations were made to address them, specifically with regards to sexual offences cases as that was the remit of the review, but if the principle was extended to all VAWG cases and the recommendations from the Gillen Review fully implemented, it would go a significant way towards easing the concerns of those considering making a report, and improving the experiences of those currently in the system.

16. Do you agree or disagree that Outcome 6 below, will enable us to achieve this draft vision?

Outcome 6 – All of Government and Society Working Better Together to End Violence Against Women and Girls.

A whole system approach with collaboration and cooperation by default across government departments and with, within and between the community, voluntary and other sectors.

Please select only one option:

☐ Strongly Agree

☒ Agree

☐ Neither Agree nor Disagree

☐ Disagree

☐ Strongly Disagree

Please add any comments you wish to make regarding Outcome 6 in the box below.

Out of all the proposed outcomes, this is the one about which we have most reservations - not because it is not good, but because it contains some vital elements that, should they fail, would negatively impact the delivery of the entire Strategy.

The WPG is concerned with the use of the word “better”, both because it is non-specific and could therefore set the bar too low; something can be better than it was, but still a failure; but also because it is nearly impossible to measure. Too often bare

minimum compliance or box-ticking can allow bodies, particularly government departments, to appear to take part in the effort without actually doing a great deal to aid progress. For this reason we call for a more robust set of measures to ensure accountability and to allow progress to be measured in a meaningful way.

Breaking the habit of siloed working across government departments, and among bodies outside of government, and fully integrating the work stream across all parts of their work will be key to the success of this Strategy. Therefore, there is considerable concern within the Women's Sector generally that non-compliant Ministers or parties that do not want to engage in all parts of the Strategy and therefore instruct Departments not to comply with parts of the work. In focus groups people repeatedly raised concerns that well-laid plans can be dismissed quite easily, and that it is commonplace for commitments in a Programme for Government be dropped quietly or done in a piecemeal, insufficient way.

Examples of areas in which greater integration is necessary include:

- Linking the TEO EVAWG Strategy with the PSNI VAWG Strategy
- Linking the TEO EVAWG Strategy with the Dept of Education work on RSE currently ongoing
- Linking the TEO EVAWG Strategy with the work of the DoJ Hate Crime team
- Linking the TEO EVAWG Strategy with the Tackling Paramilitarism programme, particularly in their work around paramilitary lending
- Linking the TEO EVAWG Strategy with ongoing work on the implementation of Safe Access Zones
- Linking the TEO EVAWG Strategy with other Social Inclusion Strategies, including LGBTQI+, Racial Equality & Disability Strategies still in development
- Assessing the impact on VAWG of changes in the economic landscape such as funding cuts that lead to the withdrawal of services or cuts to social security entitlement.

In addition, the WPG shares concerns about the way that the voluntary and community sector is treated habitually by successive governments in terms of stakeholder engagement and co-design efforts. The value that this sector brought to the co-design process for this Strategy must be recognised beyond the team who worked on it with us, let alone the value that it will contribute to the actual delivery of the Strategy. This means ensuring sustainable, long-term funding for organisations, rather than sporadic, piecemeal funding, as well as a genuine valuing of the expertise

that these organisations provide, for example in terms of work done to gather data and lived experiences that various departments routinely ignore.

It is unacceptable that our sector is expected to deliver quality services in an environment that is institutionally hostile towards us, all the while being reliant on the work that we do for the successful development and implementation of public policy. A stark example of this is the fact that Women's Aid NI lost its core funding from the Department of Health days before this response is due to be submitted, all the while we do not have a full Rape Crisis Service. Women's Aid NI is now the only Women's Aid federation in the U.K. that does not receive core funding from our devolved government.

As already highlighted in section 3.2.3, gender budgeting presents an effective mechanism for embedding a whole system approach and enabling this policy to reach its full potential. Scholars in the field of feminist public policy have identified persistent implementation gaps when it comes to gender equality policies, with high-level interventions often not translating to effective change at the community or individual levels.⁶⁴ In many cases, these gaps can be attributed to the failure to integrate policies within a gender-responsive budget. The concerns we have raised in relation to Outcome 6 are therefore a symptom of poor integration of policy aims within budgets that can effectively support them.

We recognise that the full implementation of gender budgeting requires a cross-departmental commitment from all NI Executive departments which may be outside the scope of this Strategy. However, there is nothing to prevent the EVAWG Strategy from adopting the principles of gender budgeting in its implementation plan, developing an accountability mechanism for ensuring that other policy and budgetary decisions do not undermine the vital transformation that it sets out to achieve. For example, when one department removes core funding from the main civil society organisation providing expert analysis and advocacy on behalf of victims of VAWG, gender budgeting would provide a mechanism for challenging this decision on the grounds of its gendered impact. Likewise, when social security changes, such as the removal of the discretionary support grant, is found to have a disproportionate impact on women, making them more vulnerable to abuse by paramilitary lenders, gender budgeting provides a case for mitigating measures to be taken.

Gender budgeting is good budgeting; it encourages greater transparency of government processes, more in-depth assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending

⁶⁴ Mazur, A.G. and Engeli, I. (2020) The search for the elusive recipe for gender equality: when policy implementation matters. *French Politics*, 18, 3-27.

of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures can create a firewall to prevent such disproportionate disadvantages in future. Therefore, we encourage TEO to utilise the full potential of this cross-cutting Strategy by making a policy commitment to adopt gender budgeting and seeking out advice and support from Ulster University and the NI Women's Budget Group to embed gender budgeting tools and mechanisms in the implementation process.

Placing a focus on Prevention

The emphasis of this draft Strategic Framework to End Violence Against Women and Girls is on prevention. "Prevention is about addressing the underlying causes of violence against women and girls, to stop it before it occurs." UN Women, 2012

17. Do you agree or disagree with our approach of focusing on PREVENTION to end violence against women and girls?

Please select only one option

- ☒ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree

Please add any comments you wish to make regarding our approach of focusing on prevention in the box below.

The WPG wholeheartedly agrees that there is a need to focus on prevention so that fewer victims are created, particularly because it is coupled with pillars that focus on improving the experience of survivors and improving the justice system. There is an additional economical benefit in that the investment made in prevention means that the need for investment in other parts of the work will be less necessary eventually, saving money in the long run.

Actions

Actions falling under the theme of Prevention:

- 1. Develop a society wide communications and engagement strategy to change attitudes, behaviours and social norms.*
- 2. Adopt the Task Group Sprint Model to consider the needs (including Intersectional needs) of specific groups.*
- 3. Establish a forum to coordinate work on equipping and supporting families, children and young people to enjoy healthy, respectful relationships using the curriculum (including Relationships and Sexuality Education), policies and practices in early years, schools and community sector.*
- 4. To embed structures and processes which give space for young people's voices to participate and influence decision makers in ending violence against women and girls (EVAWG) work.*
- 5. Establish a cross sectoral Further and Higher Education working group to develop a plan to address EVAWG on and off campus.*
- 6. Establish a cross-sectoral workplace forum (including unions, Labour Relations Agency, employers' organisations and other professional bodies) to develop workplace policy toolkits/ guidance and to promote workplace training/ best practice in professional standards on EVAWG, Northern Ireland Civil Service (NICS) to lead good practice in public sector.*
- 7. Support the cross-sectoral group addressing EVAWG issues in the hospitality sector and the night-time economy.*

Actions falling under the theme of Protection & Provision:

- 8. Map and undertake gap analysis of violence against women and girls (VAWG) provision in general frontline services to help inform further policy development and service delivery.*
- 9. Map and undertake gap analysis of VAWG provision in specialist frontline services including a review of referral gateways to help inform further policy development and service delivery.*
- 10. Develop further tools for communicating information on the justice system and processes to improve information sharing and enhance confidence amongst victims/survivors in support of implementation of the Victim and Witness Strategy.*
- 11. In the context of care and protections for victims in the Justice system:*
 - (a) evaluate agreed interventions that are providing support to victims to access the Justice System;*
 - (b) support research on victim attrition rates in serious sexual offences and domestic abuse cases, as part of implementation of Gillen Programme and Domestic and Sexual Abuse Strategy.*

12. Explore with partners options to create specialism in VAWG cases in court proceedings including information provision for juries.

13. Undertake a review of international best practice perpetrator prevention and management systems to inform policy development and practice in support of the review under the Domestic and Sexual Abuse Strategy.

14. Undertake a review of trends in aggravating and reinforcing factors of VAWG to inform policy development and practice.

Actions falling under the theme of Working Better Together:

15. Create a Knowledge and Network Hub within the Executive Office (TEO) to provide an accessible central resource on EVAWG research, data & evaluation and communication & engagement.

16. Establish a cross sectoral group located within the Knowledge and Network Hub to develop and lead the programme of EVAWG work on data and evaluation.

17. Through the Knowledge and Network Hub, develop and deliver an agreed annual EVAWG research programme with advice and support from a cross jurisdictional panel of academic research experts.

18. Through the Knowledge and Network Hub create reference groups to engage with lived experience, service provision, and academic research expertise in the development of the EVAWG work programme.

19. Create a five jurisdiction officials forum to share best practice and encourage cross jurisdictional shared learning.

20. NICS will identify and implement mechanisms including Programme for Government (PfG) to mainstream opportunities to EVAWG in public policies and strategies at all levels.

21. Develop funding strategy for sustainable EVAWG work across departments and other sectors.

22. In order to build widespread support for a changed society where women and girls are free from all forms of gender-based violence, abuse and harm including the attitudes, systems and structural inequalities that cause them - to seek endorsement of EVAWG strategic framework and active participation in the whole of society programme of actions by political and civic leaders

18. Do you agree or disagree that these are the right actions to take in our draft Foundational Action Plan? Please select only one option.

☐ Strongly Agree

☒ Agree

☐ Neither Agree nor Disagree

☐ Disagree

☐ Strongly Disagree

Please add any comments you wish to make regarding our draft Foundational Action Plan in the box below.

The WPG agrees that these proposed actions represent a positive start to tackling the many issues around VAWG, particularly given some of the financial constraints we are currently experiencing and because often a significant amount of groundwork often needs to be laid before the real benefits can be seen, and seen consistently in all workstreams.

However, we have selected 'agree' from the range of options above, as, ultimately, investment will be needed in order to make this Strategy work. This investment must be similar to the investment made in equivalent Strategies in other jurisdictions on these islands, on a proportional scale. We would again remind TEO that VAWG is significantly proportionately higher in NI than elsewhere on these islands, and is alone in not having a EVAWG strategy, therefore at least proportional resourcing will be required. This will ultimately save more money than it will cost, not least considering that TEO estimates that VAWG costs the economy approximately £750 million per year.

It would be beneficial if investment was made early, with a long-term plan that spans the life of the Strategy, rather than in a piecemeal way as things progress, as this creates uncertainty around the scope of work that is possible and makes it difficult to maintain momentum and energy for the work. This approach also runs the risk of sending a message to those impacted by VAWG that this issue is not a priority for the NI Executive which could impact overall levels of public confidence in the Strategy.

We also recommend that, beside each action proposed, it is made clear which actions will require the restoration of the Executive, as well as those that require legislation. This is both to increase transparency, so that the public can manage expectations accordingly, and to allow for clear lines of accountability. It should also be made clear where responsibility lies for each action listed, in the absence of having an Executive. Ultimately, we are concerned that the excellent plan of work that this Strategy proposes will be undermined by both the instability of our institutions and by the lack of commitment to investment. If this does prove to be the case, it is important that

the public, and particularly survivors, understand that there are ways that we can seek redress. For public buy-in, this is important.

Impact Assessments

19. Do you agree or disagree with the way the Equality Impact Assessment (EQIA) has been carried out? Please select only one option

- ☒ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree

20. Do you agree or disagree with the findings of the Equality Impact Assessment (EQIA)?

Please select only one option

- ☒ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree

Are there any other issues or inequalities that you believe need to be considered in the EQIA?

The WPG would like to take this opportunity to commend TEO for conducting an Equality Impact Assessment with this level of detail and due regard for issues relating to intersectionality. We recognise the effort that TEO has put into conducting such an extensive impact assessment and greatly appreciates and would like to see all other Departments undertake such a commitment to impact assessments for all future consultations.

We also welcome the focus on women and girls, and we have advocated for such an approach from the beginning of the Strategy. It is evident that TEO listened to the

experts with regards to gender-based violence and how to tackle it, and did not allow itself to be side-tracked. The outcomes, should all actions be realised, will bear the fruit of this approach.

We do have a minor criticism, in that the EQIA does not address the impacts of delays in the justice system, particularly at the PPS stages of the process. This is not to diminish the quality of what is covered, however.

5. Additional Comments

To conclude, the WPG welcome this draft Strategic Framework and Foundational Action Plan. Many constituent organisations, and the WPG as a collective, have campaigned for this for a long time. We urge only that this thorough approach and hard work be met with appropriate investment and commitment from all parts of government, and that TEO continues to drive this work once this consultation is concluded.

ENDS

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

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