

# Women's Policy Group NI

## WPG NI Response to Domestic Abuse Safe Leave Consultation

Sept 2024

**Contact:**

Elaine Crory  
Women's Sector Lobbyist  
[elaine.crory@wrda.net](mailto: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.croory@wrda.net](mailto:elaine.croory@wrda.net)

This response was prepared by the following WPG members:

- Elaine Crory – Women's Resource and Development Agency
- Meghan Hoyt - Women's Resource and Development Agency
- Siobhán Harding - Women's Support Network
- Jonna Monaghan - Women's Platform
- Caoimhe McNeill - Unison
- Jacqui McLoughlin - Women's Forum
- Sophie Nelson - Here NI
- Clare Moore - Irish Congress of Trade Unions

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 ICTU, Women's Aid Federation, Women's Regional Consortium, and Women's Platform.

## 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 Safe Leave for those experiencing Domestic Abuse, as well as Domestic Abuse and VAWG more generally. Responses made by the WPG, and some of our members, in relation to these issues include:

- WPG NI Response to the Department of Justice (DoJ)/ Department of Health (DoH) Draft Domestic and Sexual Abuse Strategy (May 2023)<sup>1</sup>
- WPG NI Response to PMB on Paid Domestic Abuse Leave Consultation (Jan 2021)<sup>2</sup>
- WPG NI Response to Domestic Abuse (Safe Leave) Bill Survey (Dec 2021)<sup>3</sup>

### 2.1. Content from previous WPG Responses

*From WPG NI Response to Domestic Abuse (Safe Leave) Bill Survey (Dec 2021)*

#### Domestic Violence as a Workplace Issue

Domestic abuse affects job performance, and therefore, job prospects and financial security. This can be heightened when both the victim and perpetrator work in the same organisation.

Many organisations over the years have expressed a willingness to support victims in the workplace, however, government support is needed to ensure that this can happen. We support calls from the Irish Congress of Trade Unions, Unison and other Trade Unions to have measures introduced to also see domestic violence as a work issue. We support calls from Unison to:

- Provide guidelines to employers on recognising the signs of abusive behaviour,
- Guidance on identifying links between abusive behaviour and a perpetrator's role at work,

---

<sup>1</sup> Available at: <https://wrda.net/wp-content/uploads/2023/05/WPG-Response-to-DSA-Strategy-.pdf>

<sup>2</sup> Available at: <https://wrda.net/wp-content/uploads/2021/01/WPG-Response-to-PMB-Consultation-Paid-Domestic-Abuse-Leave-Jan-21.pdf>

<sup>3</sup> Available at: <https://wrda.net/wp-content/uploads/2021/12/WPG-Response-to-Safe-Leave-Bill-Dec-21.pdf>

- Create workplace policies on domestic violence,
- Consider domestic abuse as a form of discrimination affecting workers' employment conditions and income,
- Introduce paid leave for those experiencing domestic abuse.

#### *Additional input from ICTU Survey*

This has been highlighted in the groundbreaking survey conducted by the Irish Congress of Trade Unions in 2014. The results were striking and proved that although this type of violence most often takes place behind closed doors, that the impact is felt throughout society, including in work.

Of the nearly 1800 respondents, almost a third had experienced domestic violence with over 40% of those reporting that it affected their ability to get into work for reasons including financial control, threats, physical injury and restraint. Respondents also reported that the abuse continued at their workplace including being harassed through phone calls and emails, many people said that their partner physically turned up to their workplace. Disturbingly, fewer than one in three of those experiencing domestic violence discussed the violence with anyone at work. The main reasons for not disclosing were “shame” and “privacy”.

Building on this work and as part of the action plan under the Stopping Domestic and Sexual Violence and Abuse strategy, a task and finish group, convened by the Departments of Health and Justice and chaired by ICTU and involving trade unions, employers and NGOs was established to draw up revised Guidelines for Employers on developing workplace policies on domestic and sexual violence. This was published in 2018.

The ICTU went on to work with the Labour Relations Agency to produce in 2023 comprehensive guidelines for employers and trade unions on supporting employees affected by domestic abuse and violence.<sup>4</sup>

Recognising the vital importance of financial security to those experiencing domestic abuse, trade union campaigns have repeatedly called for victims/survivors of domestic abuse to be given a range of supports, including leave with no loss of pay. The WPG therefore warmly welcomes the proposal to introduce paid leave to Northern Ireland.

---

<sup>4</sup> <https://www.lra.org.uk/sites/default/files/2022-12/Safe%20at%20home%20Safe%20at%20work.pdf>

### **3. General Comments on the Safe Leave for Domestic Abuse Consultation**

#### *3.1 Delay in Enacting the Legislation*

We are disappointed that it has taken so long to issue regulations on this important legislation, long campaigned for and much needed, since it passed in March 2022. The passing of that legislation made Northern Ireland, for once, a leader in this field, among the jurisdictions on these islands. Since then, other jurisdictions have followed the example laid down here, passed and then enacted the legislation. Meanwhile, survivors in Northern Ireland, a place with disproportionate levels of domestic abuse, have had to wait for more than two and a half years to see the work carried to fruition.

It is difficult to overstate how disappointing this turn of events is, for the women's sector who fought hard to support this law and see it passed, and especially for the thousands who could have benefited from its provisions had it been enacted in a timely fashion. The lackadaisical attitude towards this legislation - which had to come via a Private Members Bill, rather than from the Department of Justice as part of the Domestic Abuse legislation - is indicative of how seriously the issue of Domestic Abuse and especially violence against women and girls is seen in this jurisdiction, as compared with our nearest neighbours. While we are pleased to see this legislation finally being enacted, we remain disappointed at the way that the Department for the Economy has handled this.

#### *3.2 Safe Leave and Domestic Abuse as Gendered Issues*

We note that the Department has rightfully noted that the majority of survivors of Domestic Abuse are women, and that it is likely that women will make up the majority of those availing of Safe Leave legislation. We have long argued that this needs to be understood as a gendered phenomenon, although it can happen to anyone of any gender or sexual orientation. As such we urge departmental information about this new entitlement to be made available to all employees, and to ensure that it includes a range of signposting options, including for support organisations that deal exclusively with men, with women, and with LGBTQIA+ people, so that the person in need of the support can make their own decision as to which service is best for them.

#### *3.3 International human rights framework*

In the context of this consultation, it is essential to note that Northern Ireland is bound by the international human rights obligations of the UK, as State Party to all key human rights conventions, including the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). In short, States Parties to human

rights conventions accept obligations to put in place legislation and policy implementing provisions in the conventions, and are monitored by the relevant UN expert committees on a regular basis.

Progressive realisation of rights is a key principle of the international human rights framework, in recognition that implementation is affected by many factors including resourcing, and means that equality can be implemented incrementally, as long as core provisions are achieved. However, this incorporates a complementary principle that existing rights cannot be rolled back or weakened.<sup>5</sup> This is central in the context of equality as well as employment legislation, as it creates a central principle for a legislative framework.

The full set of recommendations for Northern Ireland and the UK from UN monitoring bodies is extensive, ranging from over 300 recommendations from the Universal Periodic Review in 2022<sup>6</sup> to the Concluding Observations on the Convention on the Elimination of All Forms of Racial Discrimination (CERD) in August 2024, and the report from the follow up to the Inquiry of the Rights of Disabled People under the UN Convention on the Rights of People with Disabilities, issued in April 2024<sup>7</sup>. All of these highlight significant equality issues, with the very recent CERD Concluding Observations highlighting gaps in equality legislation as well as uneven implementation of legislation and policies, which is highly relevant to this Inquiry.<sup>8</sup> With regard to women and gender equality, it is relevant to note that the most recent Concluding Observations for the UK express concern that protections for women in Northern Ireland are falling behind those of women elsewhere in the UK, and a key recommendation is ‘to put protections in Northern Ireland on an equal footing with those in England, Scotland and Wales’<sup>9</sup>. The CEDAW Concluding Observations urge in particular for action on violence against women, the gender pay gap and improved representation of women in public life.

---

<sup>5</sup> See [International Covenant on Economic, Social and Cultural Rights](#) for a discussion of both principles

<sup>6</sup> Human Rights Council (January 2023) [Report of the Working Group on the Universal Periodic Review: United Kingdom of Great Britain and Northern Ireland](#)

<sup>7</sup> UN Committee on the Rights of People with Disabilities (April 2024) [Report on follow-up to the inquiry concerning the United Kingdom of Great Britain and Northern Ireland](#)

<sup>8</sup> CERD Committee (August 2024) [Concluding observations on the Concluding observations on the combined twenty-fourth to twenty-sixth periodic reports of the United Kingdom of Great Britain and Northern Ireland](#)

<sup>9</sup> CEDAW Committee (March 2019) [Concluding Observations on the 8<sup>th</sup> periodic report of the UK](#)

In addition to the UN human rights framework, the European Convention on Human Rights (ECHR)<sup>10</sup> is also a relevant and essential framework for equality law. The ECHR is incorporated in domestic law through the Human Rights Act 1998, which covers Northern Ireland and provides a clear framework of legal remedies for breaches and violations of rights.<sup>11</sup> It is important that equality law in Northern Ireland is aligned with the ECHR and the Human Rights Act, as the cornerstones of a rights based legislative system. In this regard, it is notable that the Concluding Observations from CERD find that Northern Ireland is not fully compliant with the Human Rights Act, and recommends in particular that provisions in CERD are fully implemented in equality legislation that sets out a clear definition of racial discrimination.<sup>12</sup>

The ECHR also provides the framework for the European Convention on action against violence against women<sup>13</sup>, known as the Istanbul Convention, signed in 2011 and ratified by the UK in 2022<sup>14</sup>.

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 of 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 responses<sup>15</sup>. 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 practice<sup>16</sup>. The Council of Europe undertook a baseline assessment of the UK under the Istanbul Convention in early 2024, and a report is expected in 2025. Women's Platform coordinated the Northern Ireland civil society contribution to the assessment, which highlighted a need to align legislation, policy and practice with the ECHR and the Istanbul Convention, and address gaps in

---

<sup>10</sup> [European Convention on Human Rights 1950](#)

<sup>11</sup> [Human Rights Act 1998](#)

<sup>12</sup> CERD Committee (August 2024) [Concluding observations on the Concluding observations on the combined twenty-fourth to twenty-sixth periodic reports of the United Kingdom of Great Britain and Northern Ireland](#)

<sup>13</sup> Council of Europe (2011). [Convention on preventing and combating violence against women and domestic violence](#)

<sup>14</sup> Council of Europe press release 21 July 2022 '[The United Kingdom ratifies the Istanbul Convention](#)'

<sup>15</sup> Council of Europe (2011). [Convention on preventing and combating violence against women and domestic violence](#)

<sup>16</sup> Council of Europe (March 2022) [Preventing violence against women through formal and informal education: Article 14 of the Istanbul Convention](#)

particular in legislation protecting women and girls from violence and harassment, in all settings from home to workplaces and public spaces.

#### **4. Response to Consultation Questions**

[there is a section on personal/business details that has not been included here]

1. The Department proposes to include all of the abusive behaviours outlined below in its definition of abusive behaviour. Do you agree that the behaviours below should be included? Are there any other behaviours that are relevant?

Physical abuse Yes

Psychological abuse Yes

Sexual abuse Yes

Financial abuse Yes

Emotional abuse Yes

Controlling behaviour Yes

Coercive behaviour Yes

Other (please specify)

Additional text:

All categories of domestic abuse listed above as all of them are covered by the recent Domestic Abuse legislation. It would be dangerous to allow some to be seen as a “lesser” form of abuse or to create any impression among the public, including employers, that there is a hierarchy within domestic abuse, which there is not.

**Q2. In terms of ‘connected to’, which of the following relationships should be included within the regulations?**

#### **Relationship**

Is or has previously been married to each other	Yes
Is or has previously been in a Civil partnership	Yes
Is or has previously been living together as partners	Yes
Is or has previously been in an intimate relationship with each other	Yes



## Members of the same family

Parent	Yes
Grandparent	Yes
Grandchild	Yes
Sibling / step sibling / half sibling	Yes
Step children / step parents	Yes
Child	Yes

Other - WPG propose adding the following types of relationships:

- Wider family members - especially as many people live with relatives who are not their direct nuclear relationships; aunts, uncles, cousins, etc
- So-called honour-based abuse can involve extended family members also
- Foster children / foster parents should be included

While not within the scope of this consultation, we urge DoJ to consider domestic settings where people are not in relationships or families, for example flatmates. While the nature of the relationship is fundamentally different, the costs associated with breaking a lease in order to escape a dangerous situation can be prohibitive, as well as the time involved with extricating oneself from a legal agreement.

We also believe that the Department should consider cases where the abuser is a member of a paramilitary organisation and the wider organisation is carrying out a course of abuse alongside the abuse of the survivor, often in the form of stalking.

### **Q3 Do you agree that the right to safe leave should arise following a single incident of domestic abuse?**

Yes

As we have noted above, following recent legislative changes, we now recognise that domestic abuse is much more than one “type” of encounter. As such this leave has to incorporate all forms of domestic abuse, and must not “rank” the seriousness of incidents or, worse, ask employers to do so. Simply put, it all has to count.

### **Q4 The purpose of safe leave is to deal with ‘issues related to domestic abuse’. Do you think in addition to those already referred to in the Act there are any other issues related to domestic abuse which should be specified in regulations?**

Yes

Please provide any comments you might have in the text box below

It is important that we include a comprehensive account of the kinds of things that a person who is experiencing or escaping domestic abuse may involve. This includes:

- Enabling children to change schools or to attend meetings at the school regarding accommodations that may be needed to help the child to adjust.
- While we recognise that “accessing healthcare” is listed, this should also explicitly include the option to take a day for self-care
- Allowing workers who are also university or FE college students to meet with the university or college to talk about accommodations as may be needed
- Banking appointments / financial matters
- Attending follow-up medical appointments for injuries sustained eg, dental appointments would be common for victims/survivors

**Q5 Do you think identification of other ‘issues related to domestic abuse’ would be more appropriately dealt with via Departmental guidance?**

Yes.

Please provide any comments you might have in the text box below

This would be most practical, provided that the guidance is considerate of all the various issues noted above and stresses that they must be considered by an employer. There should not be differentiation between the provisions listed in regulations vs those listed in guidance, which may give employers that there are some ‘issues related to domestic abuse’ that are less serious than others.

Ideally, the Department would confer with people with lived experience to make sure that nothing is being missed. A detailed list of support organisations should be detailed in any Department Guidance.

Given the work that has been done by trade unions in both the public and private sector, we recommend that guidance is drawn up in conjunction with trade unions, using the ICTU/LRA Guidance for employers and employees as a template.

**Q6 Do you agree that the definition of leave year for the purposes of safe leave should align with the existing definition of leave year for annual leave purposes, set out in the Working Time Regulations (NI) 2016?**

Yes.

**Q7 Should the Department set out how notice to take safe leave should be given by an employee in guidance or regulations?**

Guidance

Please provide any comments you might have in the text box below:

ICTU has recommended that the Department produce a Code of Practice which has legal standing however in the absence of this, we agree that comprehensive guidance should be produced. This is with the proviso that the guidance must include instructions to employers to be flexible with regards to length of notice, where it is even possible to provide notice.

The role out of the legislation should be accompanied by information sessions aimed at employers to explain how they should implement the policy; where appropriate, this should also involve trade unions.

**Q8 The notice requirements to take safe leave are set out in regulations. Would it be appropriate to make the requirement to inform the employer as soon as reasonably practicable?**

Yes.

Please provide any comments you might have in the text box below:

Provided that it explicitly acknowledges that there are sometimes when it will be impossible to give any notice at all, we accept that notifying employers as soon as reasonably practicable is best.

**Q9 Should an employer have the option of seeking notification of the purpose of safe leave (e.g. obtaining legal advice, finding alternative accommodation etc) as part of any notice procedures?**

No.

Please provide any comments you might have in the text box below:

Safe leave is a legal entitlement and therefore requiring employees to provide this information to their employers - particularly given that, in claiming safe leave, they have definitionally already disclosed that they are survivors of Domestic Abuse - would be invasive.

Employees have legal rights to take ten days leave in total for these purposes and should not have to divulge this personal information to an employer under any circumstances.

**Q10 Should safe leave be able to be taken in periods shorter than one day?**

Yes.

Often, escaping Domestic Abuse involves multiple appointments with banks, schools, letting agents, etc as well as a series of court dates, likely to be spaced across several months. Realistically it is likely that these occasions will take place across more than 10 calendar days. Given that this legislation only covers 10 days in total, it is fair that parts of days and even hour-long slots should be allowed, in order to accommodate as many of these appointments as possible without requiring the survivor to use their annual leave.

This may also benefit the employer, as shorter time slots may be far less disruptive than a full day or several consecutive days may be. All of that aside, the employer should be as flexible as possible to allow the employee to benefit fully from this legislation.

**Q11 The intention is that employees should receive their full pay when on a period of safe leave. Should this rate of pay reflect an employee's normal pay and include components such as regular overtime, regular commission and regular bonuses or an employee's basic pay?**

Normal Pay

Please provide any comments you might have in the text box below:

A negative change in a paycheck from one month to the next could risk the victim/survivor falling behind on payments/bills, struggling to pay childcare, and could risk debt. This carries risks both with regards to the immediate financial consequences, but since we know that many who experience Domestic Abuse end up reconciling with their abuser because of the issues they face in the immediate aftermath, we should be at pains to ensure that these issues and barriers are minimised wherever possible.

**Q12 Do you have any comments on the matters which should be contained in any Department for the Economy guidance on the operation of safe leave?**

Guidance should take care to stress the need for employers to be as accommodating as possible as their employee recovers from a very traumatising and disruptive time. As much as this may require flexibility and sacrifices on the part of the employer, they are minimal when compared with the cost to the economy of tolerating domestic abuse. Many survivors in jobs where they fear their employer would not be understanding have, before this became law, left their job rather than try to

negotiate time off when facing catastrophic and dangerous life circumstances; this too, causes cost and stress for employers that they should be at pains to avoid.

This legislation will work well only if employers understand this as a right and not a privilege, that they have obligations to their employees, and that they will face consequences if they fail to properly protect that right.

The WPG also believes that guidance should encourage signposting to appropriate services that provide support; both for the individual employee in these circumstances, but also for the workforce as a whole. This may include signage in public spaces such as hallway noticeboards, canteens, bathrooms, etc.

**Q13 Is there any other support that might be useful for employers and employees?**

As above, we encourage guidance for employers encouraging signposting, so that employees know their rights in the workplace and so that the employer makes it clear that they understand their obligations as well as the seriousness of domestic abuse, and the fact that it is a workplace issue.

Where possible, workplaces should also develop a stand alone policy on Domestic Abuse in the workplace and a guide for employees on their rights and how to exercise them. This policy should name the individuals to whom an employee should make a request for Safe Leave and how they can expect this to be handled. This should also be flagged to employees as a new policy that applies to all staff, and HR, management, or other staff who would be responsible for administering it should receive appropriate training.

**Q14 Please provide any comments you might have about the role of Early Conciliation and the Tribunal processes in claims related to Domestic Abuse – Safe Leave.**

While we recognise that the Early Conciliation and Tribunal process works, in cases like this speed is of the essence and it is not clear that the Labour Relations Agency is sufficiently resourced to deal with this in a timely fashion, or appropriately trained with regards to this legislation. Given that this leave was envisioned to allow for people to take the time to do essential things to ensure their safety and that of their families in an extremely dangerous period in the course of domestic abuse, it cannot be delayed for long periods while arbitration takes place. If this is to become a duty of the LRA or any body, it must be adequately resourced and trained on this issue and able to cope with the necessity for speed.

**Q15 Do you have any additional comments about any aspect of this consultation and/or the implementation of Domestic Abuse – Safe Leave?**

We again reiterate the point made at Section 3 above - this legislation was passed 18 months ago, and it is very concerning that it has taken this long to get to the stage that the Department is finally enacting this legislation. The a la carte approach to fulfilling legal obligations cannot be allowed to stand. Domestic abuse and its consequences are well known in Northern Ireland, and it is not difficult to see why our rates of abuse and of domestic homicide are so high when we drag our feet in enacting a very simple provision such as this. The draft Programme for Government includes Ending Violence Against Women and Girls as one of its nine priority areas, and we hope that this prioritisation leads to a genuine change in how legislation like this is seen as bottom of the list of priorities.

On a more technical note, there is a need for the guidance to employers to stress that they need to provide clear reporting pathways for those who claim safe leave. In a report carried out in 2021 by WRDA in partnership with the Fawcett Society, Chwarae Teg and Close the Gap on Sexual Harassment in the Workplace<sup>17</sup>, this came out as a clear recommendation from all four parts of the UK: "Offer multiple reporting routes. The type of routes on offer will depend on the resources available to the organisation but can include a phone line, a webform or app, an independent third-party, and an anti-sexual harassment pioneer. At a minimum, employees should be able to make a report to at least two different people and those people should come from different levels within the organisation."<sup>18</sup> While we recognise that sexual harassment and domestic abuse are not the same, the same principle applies, and there is much to be learned from this report in terms of the guidance appropriate for employers as they prepare for the roll out of this policy.

It is also vital that the staff members dealing with these disclosures be appropriately trained, both in terms of their legal obligations and in terms of the nature of the disclosures that they may receive. In larger organisations, the person in the Human Resources department who is responsible for this might find themselves hearing some harrowing disclosures and they will need support of their own. Women's Aid, Rape Crisis, and other organisations who specialise in this kind of thing have supports in place for their staff, and advice from them should be sought and followed.

---

<sup>17</sup> Tackling Sexual Harassment in the Workplace, 2021, Available at: <https://www.fawcettsociety.org.uk/Handlers/Download.ashx?IDMF=8eabc7f1-07c0-4d7e-9206-de431524301e>

<sup>18</sup> Ibid p.16

**Q16 Please use the space below if you wish to provide any comments or feedback on any of the associated impact assessments.**

The Equality Impact Assessment is quite good, although it is important to note that women with a disability are also disproportionately impacted by domestic abuse and by violence against women and girls more broadly<sup>19</sup>, in addition to facing additional barriers when seeking support.

While Small and Micro Business Impact Assessments are not something that we see regularly when Impact Assessments are carried out, and therefore the quality is difficult to benchmark, we note with gratitude that the Department is clear that the primary legislation is non-negotiable and that the law applies to all businesses of all sizes. It also stresses that employee retention is valuable to employers also.

#### 5. Additional Comments

To conclude, we are grateful that this legislation which we supported from its inception is finally being enacted, after a long delay. We urge the department to provide comprehensive guidance as a matter of urgency and to ensure that this new employment right is properly embedded and understood widely.

*ENDS*

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

- Elaine Crory, Women's Sector Lobbyist at WRDA: [elaine.croory@wrda.net](mailto:elaine.croory@wrda.net) or
- Meghan Hoyt, Women's Sector Lobbyist Policy Assistant at WRDA: [meghan.hoyt@wrda.net](mailto:meghan.hoyt@wrda.net)

---

<sup>19</sup> Women's Policy Group NI, Violence Against Disabled Women and Girls in Northern Ireland: Key Briefing, 2022. Available at: <https://wrda.net/wp-content/uploads/2022/08/Violence-Against-Disabled-Women-Girls-WPG-Research-Briefing.pdf>