



Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

Response to: Domestic and Sexual Abuse Strategy Consultation

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Foyle Women's
Information
Network



Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.¹ The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and

¹ Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisation

support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women’s Regional Consortium previously responded to the Call for Views on the Domestic and Sexual Abuse Strategy² and suggest that many of the comments made in the Call for Views remain relevant to this Consultation.

1.5 We support the Letter of Concern sent by Women’s Aid Federation Northern Ireland (WAFNI) on 26th April to the Permanent Secretaries of the Departments of Health and Justice. This Letter of Concern shares WAFNI’s disappointment at the lack of detail in the Draft Strategy highlighting its *“limited detail and content.”* In particular, the Departments should be especially concerned that Women’s Aid have stated in this letter that the voices of women, girls, children and young people *“were not heard or included within the Draft Strategy.”*

1.6 We wish to endorse the response made by the Women’s Policy Group of which we are a member. We fully endorse their response and support their valuable and informative survey evidence and their recommendations in relation to the development of the final Strategy. We also fully endorse the response made by our colleagues in Women’s Aid NI who are experts in this area and who contribute vital and significant understanding, knowledge and lived experience to this Strategy.

² <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/03/Womens-Regional-Consortium-NI-response-to-DSV-VAWG-Call-for-Evidence.pdf>

2.0 General Comments

The Women's Regional Consortium response to the Call for Views on the Domestic and Sexual Abuse Strategy provided much feedback which we consider still remains relevant to this Consultation. Repeating many of the issues raised in the Call for Views is not an effective use of time especially given extremely tight resources and current pressures of work within the community and voluntary sector.

In general, we believe there is a lack of detail in the draft Strategy particularly with regards to specific actions and targeted outcomes to effectively tackle domestic and sexual abuse. We are aware that further Action Plans are to be developed but believe that these should have been provided as part of this consultation process. Without the detail of the actions planned it is impossible to comment on how this Strategy will achieve its stated Vision and Aim.

We have briefly summarised the main points from our response to the Call for Views which we wish to reiterate:

- the importance of specifically recognising the gendered nature of domestic and sexual abuse in terms of the actions which need to be taken in the Strategy;
- the critical importance of funding for the Strategy - without long-term sustainable funding there is no chance of achieving the vision and aim for the Strategy;
- the need to see full implementation of the Gillen Review recommendations including training across all levels of the judiciary on how domestic and sexual abuse presents, on harmful myths and internalised beliefs;
- the need for better training for the police around domestic and sexual abuse so that there are well defined responses to the reporting of incidents and that these are given priority;
- the need for greater empathy and understanding about the impact of domestic and sexual abuse by the police, justice system and other agencies victims come into contact with;

- the need for reform of the justice system as the law often fails victims who need to take action against their abuser including the robust enforcement of court orders and the appropriate sanctions so that violence and attempts to control do not go unpunished;
- the need for an acknowledgement of the impact of the Cost of Living Crisis and welfare reform/austerity measures on the ability of women to leave abusive relationships;
- the need for trauma-informed assessments for social security for those who have suffered abuse to ensure that victims are able to access their rightful entitlements;
- domestic abuse is a significant workplace issue and domestic abuse leave should only be one of a number of rights around domestic abuse provided in the workplace;
- the need for investment in specialist services for domestic and sexual abuse to cope with rising demand including the provision of secure funding which keeps pace with Cost of Living increases;
- the need for appropriate housing including refuge services and suitable, affordable housing to ensure that victims have somewhere to go when they leave an abusive partner;
- the links between domestic and sexual abuse and mental health and the need for victims to be able to access appropriate mental health services in a timely manner;
- there are clear links between the Domestic & Sexual Abuse Strategy and the Violence Against Women & Girls Strategy and it is important that they work closely together;
- this Strategy must not work in isolation from a range of other Strategies on inter-connected issues including the Gender Equality, Disability, LGBTQI+ and Anti-Poverty Strategies, the Mental Health Strategy, Drug and Alcohol Strategy, Homelessness Strategy, etc.
- education is key to prevention therefore comprehensive Relationship and Sexuality Education (RSE) standardised across all schools which takes into

account the full range of relationships is vital to aid the prevention of violence and abuse;

- the need for information, advice and support for victims and families and those who witness domestic and sexual abuse especially children;
- there is a need for greater understanding of the issue of intimate partner violence with increased information and support to raise awareness and to help women in these circumstances get the help they need;
- statistics show that the majority of sexual offending takes place against children so there is a need to prioritise prevention of abuse against children and more work to address the needs of child victims;
- the need for work to overcome the barriers to accessing services and support for specific groups including minority ethnic communities, disabled people, LGBTQI+ communities and those with No Recourse to Public Funds;
- greater public awareness is needed around the full range of behaviours that constitute domestic and sexual abuse;
- there is a need to address the existing stigma, attitudes and perceptions to domestic and sexual abuse so that victims can more easily come forward and be supported to take action;
- there is an urgent need for more complete, accurate and up-to-date data in relation to both victims and perpetrators to help with awareness raising, provision of support and prevention work;
- the importance of lived experience in helping to shape support, services and solutions around domestic and sexual violence. This must be genuine engagement and valued for the expertise and knowledge it brings and ensuring that resourcing is provided for this work;
- the extension of the remit of Sexual Offence Legal Advisors (SOLAs) to provide information and general legal advice in serious sexual offences cases to include the case and afterwards;
- the appointment of an Independent Domestic Abuse Commissioner who could provide important scrutiny and act as an essential mechanism for accountability on the new domestic abuse strategy and legislation;

- the need for perpetrators to know that there are consequences and that they will be punished appropriately for their actions. They need to know that action can be taken and that sentences will be enforced;
- the need to work with perpetrators and perpetrator programmes should be a mandatory part of the system;
- the need for true partnership working which values collaboration with other sectors including the input of the voluntary and community sector which has done so much work in this area.

2.1 Format of the Questionnaire

The Women’s Regional Consortium also has concerns about the format of some of the consultation questions. It asks a number questions with options followed by a space to expand the answer. As WRDA guidance on public consultations³ states: “the binary ‘agree/disagree’ nature of many questions hides the complexity of how people feel about different issues.” We would urge extreme caution on using statistics on responses to these binary questions as the basis for making any conclusions on the proposals.

The answer to these ‘agree/disagree’ questions needs careful analysis alongside the accompanying text. Careful consideration must be given to the fact that respondees may select one of these options but clarify this in the space below. They may have several qualifications to their answer and if these are not addressed their answer may be different. The results from the ‘agree/disagree’ answers must not be considered in isolation or presented in such a way that they paint a misleading picture of responses. We would encourage the Departments not to use results from these binary questions alone as the basis for any decision making. If they are to be used they should not be used in isolation from any clarifications given within the accompanying text.

³ Ibid

We would refer all Government departments to the guidance on consulting with women produced by Women's Regional Consortium members WRDA.⁴ This guidance contains five top tips based on the many years of experience that women's groups have in promoting women's participation in public policy making. These include the need to work together with the women's community and voluntary sector, making time for accessible face to face engagement, keeping language accessible and relevant, listening to the stories from women and making women visible in the product as well as the process.

2.2 International Obligations

We support our Women's Policy Group partner, Women's Platform, who are urging for CEDAW to be recognised as an international obligation of the UK which would provide a framework for this Strategy and would also create effective links to the Gender Equality Strategy and the other social inclusion Strategies. This would help to create cross Departmental links and ensure that all Departments would contribute to a society where women and girls are safe, feel safe, and where gender based violence is no longer socially acceptable.

CEDAW's General Recommendation 35⁵ on gender-based violence against women spells out carefully the general obligations of states parties under CEDAW in relation to gender-based violence against women. The overarching obligation of States parties is to pursue by all appropriate means and without delay a policy of eliminating discrimination against women, including gender-based violence against women.

In its most recent Concluding Observations for the UK Government the CEDAW Committee welcomed the adoption of measures to combat violence against women and girls in England, Wales and Scotland but were *"concerned about the lack of uniform protection of women and girls from all forms of gender-based violence across*

⁴ Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017

https://wrda.net/wpcontent/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf

⁵ General recommendation No.35 on gender-based violence against women, updating general recommendation No.19, CEDAW/C/GC/35, July 2017

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GC/35&Lang=en

*the jurisdiction of the State party, noting with particular concern the inadequacy of laws and policies to protect women in Northern Ireland.”*⁶ The Committee recommends that women have effective access to justice, support and remedies particularly for women with disabilities, black, Asian and minority ethnic women, asylum-seeking and refugee women and victims of gender-based violence and of trafficking.

The Committee also recommended that the State party ratifies the Istanbul Convention. The Istanbul Convention aims to prevent all forms of violence against women, protect those who experience it and prosecute perpetrators.⁷ It is particularly vital that Strategies are in line with the Istanbul Convention, as shortfalls in Northern Ireland have in part prevented the UK from ratifying the Convention.

Ratifying the Convention would commit the UK government to following a strong set of minimum standards in combatting violence against women and girls. 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. The Convention also 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 the development of judicial systems and responses.⁸

⁶ Concluding observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, Committee on the Elimination of Discrimination Against Women, Para 29 https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2fC%2f%20GBR%2fCO%2f8&Lang=en

⁷ Council of Europe Convention on preventing and combating violence against women and domestic violence <https://www.coe.int/en/web/conventions/full-list/-/conventions/rms/090000168008482e>

⁸ Council of Europe Convention on preventing and combating violence against women and domestic violence [Convention on preventing and combating violence against women and domestic violence](https://www.coe.int/en/web/conventions/full-list/-/conventions/rms/090000168008482e)

3.0 Response to questions on the Domestic and Sexual Abuse Strategy

I am responding as (Please tick one option only)

- A member of the public (Do not provide your name or email address)
- On behalf of an organisation – Please specify below and include your organisation’s email address:

Women’s Regional Consortium
policy@wsn.org.uk

Question 1: Is the vision of the draft strategy reflective of what we want to achieve?

- Agree
- Disagree
- Don’t Know

Please add any comments you wish to make in the box below:

- We welcome an ambitious Vision within the draft Strategy and believe that it must be ambitious to address the alarming (and increasing) levels of domestic and sexual abuse that exist in Northern Ireland.
- We do not agree that the proposed outcomes and key priority areas are anywhere near ambitious enough to achieve this Vision.
- As stated in our General Comments there is a lack of detail in the draft Strategy particularly with regards to specific actions and targeted outcomes to effectively tackle domestic and sexual abuse.
- The Vision does not mention victims and survivors. We believe it should include victims and survivors to send out a strong message that they will be believed and supported.

“At a basic level victims need to be heard. The act of someone being present and listening to a victim’s story provides an opportunity for personal release.”

Question 2: Does the definition of domestic abuse, as outlined in the draft strategy, reflect what you understand this to mean?

- Agree
- Disagree
- Don’t Know

Please add any comments you wish to make in the box below:

- Generally, the definition of domestic abuse reflects what we understand this to mean.
- However, while the draft makes reference to the gendered nature of domestic abuse (68% of victims were female and 83% of offenders were male) this is a highly gendered crime and we believe that the context around this should have been given more focus within this section of the document.
- There are significant overlaps between domestic abuse and sexual abuse and therefore they should not be treated in isolation from each other. We suggest they should be much more interlinked throughout the Strategy.

“Domestic Abuse is a massive issue for women. There’s so much of it going on that is hidden that no one knows about.”

Question 3: Does the definition of sexual abuse, as outlined in the draft strategy, reflect what you understand this to mean?

- Agree
- Disagree
- Don’t Know

Please add any comments you wish to make in the box below:

- Generally, the definition of sexual abuse reflects what we understand this to mean.
- However, while the draft makes reference to the gendered nature of sexual abuse (78% of victims were female) this is a highly gendered crime and we believe that the context around this should have been given more focus within this section of the document.
- In addition, the figures around sexual abuse for children are particularly shocking (57% of sexual abuse victims were under the age of 18, 14% were aged between 18 and 24). Given that children are the victims in the majority of sexual offending this should be given much greater priority and we believe necessitates much greater focus than it is currently given within this section of the document.

“Women are treated as if they are possessions and often seen as the weaker sex. A man can say he didn’t mean it or he’s had too much to drink, there’s always an excuse.”

Question 4: Do you agree with the use of the four pillars in the draft strategy (Partnership, Prevention, Support and Justice) as levers for change?

- Agree
- Disagree
- Don’t Know

Please add any comments you wish to make in the box below:

- We agree that Partnership, Prevention, Support and Justice are vitally important elements as levers for change.
- However, a lack of detail around specific actions and targeted outcomes within the pillar structure outlined in the draft Strategy makes it impossible to see how these can act as levers for change as they currently stand.

“They are too slow in getting the laws changed and in the meantime people are dying. There needs to be more training for the Police/Courts around all of this. High profile cases get attention but not normal ones so people don’t see it is a problem and they don’t see people getting punished for it.”

Question 5: Do you agree with the outcome and key priority areas identified under Pillar 1 (Partnership) and how we will know we are making a difference?

	Agree	Disagree	Don't Know
Outcome: A coordinated response to domestic and sexual abuse informed by victims' voices and community engagement	<input checked="" type="checkbox"/>		
Key Priority area: Working collaboratively across all government Departments and with statutory, voluntary and community and faith organisations to tackle domestic and sexual abuse	<input checked="" type="checkbox"/>		
Key Priority area: Having effective governance structures underpinning the strategy's delivery with a performance framework to monitor outcomes and impact	<input checked="" type="checkbox"/>		
Key Priority area: Informing policy, legislation and service development with better quality data, research and shared learning	<input checked="" type="checkbox"/>		
Key Priority area: Having increased opportunities for victims' voices to be heard and ensuring the strategy's delivery is underpinned by intersectionality recognising that many people have multiple needs and face multiple barriers	<input checked="" type="checkbox"/>		

How will we know we are making a difference?

	Agree	Disagree	Don't Know
Listening to views of victims, including children			<input checked="" type="checkbox"/>
Ensuring joined up working on cross cutting projects			<input checked="" type="checkbox"/>
Engaging regularly with key stakeholders at both a regional and local level			<input checked="" type="checkbox"/>
Data from key stakeholders is shared, ensuring that as a system we understand and can respond to trends and emerging issues			<input checked="" type="checkbox"/>
Review of action plans and performance indicators on a regular basis by all partners to ensure progress is made			<input checked="" type="checkbox"/>

Please add any comments you wish to make in the box below:

- While we agree with the Outcome and Key Priority areas in this Pillar the draft Strategy is too high level and does not contain any meaningful detail, clear actions or targeted outcomes. It is therefore impossible to determine how the Outcome and Key Priority areas will deliver meaningful change for victims and survivors or how the Strategy will meet its stated Vision and Aim.
- It is also impossible to determine how the Departments will know they are making a difference from the limited amount of information given in the draft Strategy. It is weak on detail and substantive actions that will enable measurement of any positive change.
- This pillar does not address the gendered nature of domestic and sexual abuse. As the Gender Equality Strategy Expert Panel Advisory Report⁹ states “without

⁹ Gender Equality Strategy, Expert Advisory Panel Report, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

recognising the gendered nature of these crimes, it will not be possible to transform attitudes in society that prevent crimes such as these from happening and create a culture of zero tolerance.”

- We welcome the acknowledgement of the need for partnership working and for collaborative working with all sectors including the community and voluntary sector who do so much work in this area. We have referenced the work of Women’s Centres in Question 9 of our response and encourage the Departments to note the crucial role played by Women’s Centres in the area of Domestic and Sexual Abuse and the ongoing issues they face with funding. The work of the third sector must be valued as part of this process and not simply viewed as an add-on or completely ignored. Many of the organisations working in the community and voluntary sector have years of experience in working with victims and survivors of domestic and sexual abuse and also in working with perpetrators. They are skilled at reaching those who are the most marginalised within communities and provide trusted spaces and skilled people to do this work. It is valuable work that must be recognised and rewarded as such.
- Robust data gathering is a hugely important issue yet the reference to data under this pillar is vague. The Gender Equality Strategy Expert Advisory Panel Report¹⁰ referenced the lack of robust, disaggregated data and stressed that *“this is an issue of critical concern and one which requires urgent action.”* This is an important consideration for this Strategy as having access to relevant, up to date data broken down across the Section 75 groups allows for a greater understanding of the scale and nature of the problem as well as the targeting of policies and decision making to where it is needed most.
- This pillar references increased opportunities for victims’ voices to be heard but does not give any detail on how this will be achieved. There is no detail around

¹⁰ Gender Equality Strategy, Expert Advisory Panel Report, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

how the Departments intend to engage with victims and survivors and no mention of any resourcing for this important work. Victims and survivors are critical to every aspect of this Strategy and have vital and invaluable experience, knowledge and insight to contribute.

- This pillar also references intersectionality recognising that many people have multiple needs and face multiple barriers. However, there is no detail around how this will be achieved. It is not enough to acknowledge that different groups have additional needs and barriers to accessing support without addressing specific and targeted actions to ensure that their needs are catered for and their barriers overcome.
- We support the call from our colleagues in NSPCC for a refocus of the Strategy on children – including much greater prioritisation on the prevention of abuse and violence against children, addressing all forms of violence and abuse experienced by children and meeting the needs of child victims.
- There is no mention of funding within this pillar. The people of Northern Ireland deserve a robust, fully funded Domestic & Sexual Abuse Strategy. Without the necessary funding to input into the Outcome and Key Priority areas there will be no chance of making a difference and achieving the Vision and Aim for the Strategy.

“The work of the women’s sector and women’s centres is not valued. We are just fed crumbs of funding. Yet the sector is constantly firefighting doing the work on the ground.”

Question 6: Do you agree with the outcomes and key priority areas identified under Pillar 2 (Prevention) and how we will know we are making a difference?

	Agree	Disagree	Don't Know
Outcome: The public is informed about the different types of domestic and sexual abuse and its impact on victims including children	<input checked="" type="checkbox"/>		
Key Priority area: Raising awareness, so that those experiencing, or at risk of experiencing domestic and sexual abuse, recognise it and know that help is available	<input checked="" type="checkbox"/>		
Key Priority area: Empowering people to safely challenge attitudes, beliefs and behaviours that foster domestic and sexual abuse	<input checked="" type="checkbox"/>		
Outcome: An increase in the knowledge and skills of children, young people and adults about forming healthy relationships	<input checked="" type="checkbox"/>		
Key Priority area: Supporting the education sector to build capacity, knowledge and skills to promote understanding about consent and healthy relationships and to teach about sensitive subjects such as domestic and sexual abuse, in an age appropriate and inclusive way, across schools and other youth settings, training facilities, Further Education Colleges and Universities	<input checked="" type="checkbox"/>		
Outcome: Domestic and sexual abuse is identified and responded to earlier	<input checked="" type="checkbox"/>		
Key Priority area: Enabling people working in frontline and public-facing roles to identify and respond effectively to domestic and sexual abuse at the earliest opportunity	<input checked="" type="checkbox"/>		

Key Priority area: Supporting employers in the public, private and other sectors to make workplaces safer by raising awareness of domestic and sexual abuse and promoting workplace policies with effective measures to support staff	<input checked="" type="checkbox"/>		
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How will we know we are making a difference?

	Agree	Disagree	Don't Know
Public awareness of domestic and sexual abuse			<input checked="" type="checkbox"/>
Increased reporting of domestic and sexual abuse			<input checked="" type="checkbox"/>
Prevention initiatives supporting individuals to develop healthy relationships			<input checked="" type="checkbox"/>
Referrals from a wider range of agencies to MARAC and domestic and sexual abuse services			<input checked="" type="checkbox"/>
Domestic abuse is recognised as a workplace issue			<input checked="" type="checkbox"/>

Please add any comments you wish to make in the box below:

- While we agree with the Outcomes and Key Priority areas in this Pillar the draft Strategy is too high level and does not contain any meaningful detail, clear actions or targeted outcomes. It is therefore impossible to determine how the Outcomes and Key Priority areas will deliver meaningful change for victims and survivors or how the Strategy will meet its stated Vision and Aim.
- It is also impossible to determine how the Departments will know they are making a difference from the limited amount of information given in the draft Strategy. It is weak on detail and substantive actions that will enable measurement of any positive change.

- This pillar does not address the gendered nature of domestic and sexual abuse. As the Gender Equality Strategy Expert Panel Advisory Report¹¹ states *“without recognising the gendered nature of these crimes, it will not be possible to transform attitudes in society that prevent crimes such as these from happening and create a culture of zero tolerance.”*
- This pillar does not mention victims and survivors. There would be much to learn from the voices of victims and survivors around prevention work yet they are not included in this section at all. Victims and survivors are critical to every aspect of this Strategy and have vital and invaluable experience, knowledge and insight to contribute.
- This pillar does not mention intersectionality despite the fact that there will be a need to target and tailor prevention work to different groups depending on their specific needs and barriers.
- This pillar talks about raising awareness around domestic and sexual abuse and empowering people to challenge behaviours and attitudes yet makes no attempt to detail how this might be achieved. We caution about a focus being on mainly web-based or digital information. While this is an important means of finding out information for many people it is not for others especially where there is literacy or learning difficulties and issues with patchy internet access (particularly in rural areas). In our discussions with local women we found that few of them had accessed the information they needed through Government websites but were more likely to find out the information they needed through the trusted spaces they used like Women’s Centres.
- We welcome that education is included in this pillar. We believe that education is critical to prevention work and want to see comprehensive Relationship and Sexuality Education (RSE) standardised across all schools which takes into account the full range of relationships. We support the Gender Equality Strategy

¹¹ Gender Equality Strategy, Expert Advisory Panel Report, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

Expert Panel Advisory report which called for RSE which is fit for purpose and inclusive of the experiences of all young people¹² and that it should take account of the CEDAW Recommendation¹³ to: *“take measures to introduce mandatory age-appropriate education on sexual and reproductive rights in school curricula, including issues such as gender relations and responsible sexual behaviour, throughout the State party.”*

- In our answer to Question 9 of this consultation we have provided information on the Raise Your Voice project.¹⁴ Raise Your Voice was set up to raise awareness and educate the public on sexual harassment and sexual violence. The project offers workshops on sexual harassment, consent, online abuse, bystander intervention and allyship. We support the recommendation by the Gender Equality Strategy Expert Advisory Panel Report¹⁵ that adequate funding and resourcing should also be made available to support groups such as the Raise Your Voice who are working directly with the community, increasing public awareness, educating organisations on best practice and lobbying for legislative advances in this area.
- We believe there is an insufficient focus on work under this pillar. While it is mentioned there is a complete lack of detail around this area. Domestic and sexual violence can impact greatly on the working life of someone who is a victim. We welcome the introduction of a right to statutory paid domestic abuse leave which is due to be introduced in Northern Ireland through the Domestic Abuse (Safe Leave) Act (Northern Ireland) 2022. However, this should only be one of a number of rights around domestic and sexual abuse that should be

¹² Gender Equality Strategy Expert Advisory Panel Report, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

¹³ Concluding observations on the eighth periodic report of the United Kingdom of Great Britain and Northern Ireland, March 2019, Para 42 (c)
https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolNo=CEDAW/C/GBR/CO/8&Lang=En

¹⁴ [Raise Your Voice](#)

¹⁵ Gender Equality Strategy Expert Advisory Panel Report, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

provided for in the workplace and there is much more that employers can do in terms of workplace policies and training.

- We support the call from our colleagues in NSPCC for a refocus of the Strategy on children – including much greater prioritisation on the prevention of abuse and violence against children, addressing all forms of violence and abuse experienced by children and meeting the needs of child victims.
- There is no mention of funding within this pillar. The people of Northern Ireland deserve a robust, fully funded Domestic & Sexual Abuse Strategy. Without the necessary funding to input into the Outcomes and Key Priority areas there will be no chance of making a difference and achieving the Vision and Aim for the Strategy.

“You have to know what you’re looking for on a website. I find out about lots of things through the Women’s Centre. It’s amazing what I’ve learned and heard about here – I get knowledge on so many things that I try and pass on to others.”

“There is a need to go into schools and for relationship and sexuality education to be part of the school curriculum so that it has to be done. It must be age appropriate right through school from an early age.”

Question 7: Do you agree with the outcomes and key priority areas identified under Pillar 3 (Support) and how we will know we are making a difference?

	Agree	Disagree	Don’t Know
Outcome: Victims including children are supported and feel safe regardless of diversity of need	<input checked="" type="checkbox"/>		
Key Priority area: Providing support for victims, including children, as well as wider family, to reduce the risk and impact of abuse; recover from trauma and im-	<input checked="" type="checkbox"/>		

prove their health and well-being; and engage in the justice system in a way that ensures they feel protected and safe			
Key Priority area: Ensuring there is a focus on tackling sexual abuse, including the sexual abuse of children and young people, and providing specialist support for victims	<input checked="" type="checkbox"/>		
Key Priority area: Enabling services to better understand intersectional needs of individuals to ensure victims get the responses and support they need	<input checked="" type="checkbox"/>		
Outcome: All victims of domestic abuse including children can access safe accommodation-based services	<input checked="" type="checkbox"/>		
Key Priority area: Ensuring all victims and their children can access accommodation that is safe and appropriate to their needs and circumstances	<input checked="" type="checkbox"/>		
Key Priority area: Supporting victims of domestic abuse to remain safely in their home if they want to and it is safe to do so	<input checked="" type="checkbox"/>		

How will we know we are making a difference?

	Agree	Disagree	Don't Know
Victims of domestic and sexual abuse access support			<input checked="" type="checkbox"/>
Learning from the experience of victims to inform best practice			<input checked="" type="checkbox"/>
Provision of services			<input checked="" type="checkbox"/>
Fewer victims of domestic and sexual abuse withdraw from the criminal justice process			<input checked="" type="checkbox"/>

Please add any comments you wish to make in the box below:

- While we agree with the Outcomes and Key Priority areas in this Pillar the draft Strategy is too high level and does not contain any meaningful detail, clear actions or targeted outcomes. It is therefore impossible to determine how the Outcomes and Key Priority areas will deliver meaningful change for victims and survivors or how the Strategy will meet its stated Vision and Aim.
- It is also impossible to determine how the Departments will know they are making a difference from the limited amount of information given in the draft Strategy. It is weak on detail and substantive actions that will enable measurement of any positive change.
- This pillar does not address the gendered nature of domestic and sexual abuse. As the Gender Equality Strategy Expert Panel Advisory Report¹⁶ states *“without recognising the gendered nature of these crimes, it will not be possible to transform attitudes in society that prevent crimes such as these from happening and create a culture of zero tolerance.”*
- Increases in domestic and sexual abuse statistics in Northern Ireland point to the urgent need for increased funding for specialist services to meet growing demand. Yet specialist support services like Women’s Aid are stretched to capacity with no additional support from Government despite the fact there is likely to be increased demand especially considering the introduction of legislation to make coercive control a crime. It is essential that these services receive secure funding which keeps pace with increases in the cost of living so that they can properly support women through the provision of refuge accommodation and a range of other important support services.
- Access to housing, secure tenancies and the appropriate funding of refuges must be compliant with the Istanbul Convention. Article 20 of the

¹⁶ Gender Equality Strategy, Expert Advisory Panel Report, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

Convention¹⁷ states: *“Parties shall take the necessary legislative or other measures to ensure that victims have access to services facilitating their recovery from violence. These measures should include, when necessary, services such as legal and psychological counselling, financial assistance, housing, education, training and assistance in finding employment.”* In addition, an explanatory report to the Convention recommends: *“safe accommodation in specialised women’s shelters, available in every region, with one family place per 10 000 head of population.”*¹⁸

- Housing is a significant issue for victims and survivors yet there is only brief mention of accommodation within this pillar. The ability of survivors of domestic abuse to rebuild their lives can be severely limited by a lack of suitable housing which is appropriate for their particular needs including the needs of disabled women and children. Insufficient social housing stock can have serious implications in domestic violence situations leaving victims trapped in coercive and abusive situations as they have nowhere to go. The situation is even worse in rural areas where there is even less social housing available in the locality and victims are reluctant to move their children from local social networks and schools.
- In our answer to Question 9 of this consultation we have provided information on the Rape Crisis service. Rape Crisis Northern Ireland is a non-governmental organisation and support service for anyone that has been impacted by sexual violence in adulthood. The Rape Crisis Service is another specialist service where long-term, sustainable funding is needed to continue, develop and extend the support services available to victims and survivors of sexual abuse.

¹⁷ Council of Europe Convention on preventing and combating violence against women and domestic violence, April 2011

[Council of Europe Convention on preventing and combating violence against women and domestic violence \(coe.int\)](https://www.coe.int/t/e/treaties/Convention+on+preventing+and+combating+violence+against+women+and+domestic+violence+(coe.int).aspx)

¹⁸ Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence

[CETS 210 - Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence \(coe.int\)](https://www.coe.int/t/e/treaties/Convention+on+preventing+and+combating+violence+against+women+and+domestic+violence+(coe.int).aspx)

- This pillar makes brief reference to support for victims to engage in the justice system in a way that ensures they feel protected and safe but does not provide any detail as to how this might be achieved. The Gillen Review contains more than 200 recommendations that could drastically change the experiences of victims/survivors within the judicial process. There is an urgent need to implement training across all levels of the judiciary (including juries) on how domestic and sexual abuse presents, on harmful myths and internalised beliefs. A timetable to implement the recommendations from the Gillen Review should be published and actioned urgently.
- This pillar mentions learning from the experience of victims to inform best practice but again does not provide any detail as to how this might be achieved. The lived experience of victims and survivors will be critical to making the necessary changes to ensure that they have access to appropriate and timely support. However, there must be genuine engagement and true value and recognition must be given to this work including the necessary resourcing. Drawing from lived experience must not be a tick box exercise it must be about genuine participation and willingness to learn from those who understand and live the issues. This engagement must result in meaningful action on what has been learned through this work.
- While this pillar makes a passing mention of the need to better understand the intersectional needs of individuals to ensure they get the responses and support they need it is again scant on the detail of how this might be achieved. There is no point in acknowledging there are intersectional needs and barriers without specifically detailing how these might be addressed.
- We believe that given children are the victims in the majority of sexual offending there is a concerning lack of emphasis in the draft Strategy to assess or address their needs. We support the call from our colleagues in NSPCC for a refocus of the Strategy on children – including much greater prioritisation on the prevention of abuse and violence against children,

addressing all forms of violence and abuse experienced by children and meeting the needs of child victims.

- There is no mention of funding within this pillar. The people of Northern Ireland deserve a robust, fully funded Domestic & Sexual Abuse Strategy. Without the necessary funding to input into the Outcomes and Key Priority areas there will be no chance of making a difference and achieving the Vision and Aim for the Strategy.

“The experience that people get when they reach out for help is so important – they have to be able to get the information, advice and help they need there and then.”

Question 8: Do you agree with the outcomes and key priority areas identified under Pillar 4 (Justice) and how we will know we are making a difference?

ADDRESSING ABUSIVE BEHAVIOURS

	Agree	Disagree	Don't Know
Outcome: Individuals are responsible for their abusive behaviour, are held to account and supported to change, with the risk of harm reduced and victim safety enhanced	<input checked="" type="checkbox"/>		
Key Priority area: Supporting individuals to address and manage their abusive behaviours and sustain positive change	<input checked="" type="checkbox"/>		
Key Priority area: Encouraging individuals to change their abusive behaviour by removing barriers to participation	<input checked="" type="checkbox"/>		
Key Priority area: Working collaboratively to target the most prolific offenders, improving risk assessment and management	<input checked="" type="checkbox"/>		
Key Priority area: Providing integrated safety and support structures for victims	<input checked="" type="checkbox"/>		

where programmes to address abusive behaviours are undertaken			
Key Priority area: Improving protections for those at risk of abuse	<input checked="" type="checkbox"/>		

JUSTICE SYSTEM

	Agree	Disagree	Don't Know
Outcome: Victims feel confident to report domestic and sexual abuse, barriers to participating in the justice system are reduced and justice responses are effective	<input checked="" type="checkbox"/>		
Key Priority area: Understanding better the factors contributing to high attrition levels (drop out of cases) and under-reporting in domestic and sexual abuse cases in order to improve these	<input checked="" type="checkbox"/>		
Key Priority area: Providing victims of domestic and sexual abuse with information and services to support them through the criminal justice process	<input checked="" type="checkbox"/>		
Key Priority area: Improving the efficiency of the justice system and how domestic and sexual abuse cases are dealt with in criminal, civil and family courts	<input checked="" type="checkbox"/>		
Key Priority area: Strengthening the police and criminal justice response to domestic and sexual abuse	<input checked="" type="checkbox"/>		

How will we know we are making a difference?

	Agree	Disagree	Don't Know
A reduction in repeat incidents of domestic and sexual abuse			<input checked="" type="checkbox"/>

Increase in levels of convictions for domestic and sexual abuse offences			<input checked="" type="checkbox"/>
Engagement in behavioural change programmes and associated reoffending levels			<input checked="" type="checkbox"/>
Increase in protection orders granted and reduction in associated breaches			<input checked="" type="checkbox"/>
Increased reporting of domestic and sexual abuse			<input checked="" type="checkbox"/>
Fewer victims of domestic and sexual abuse withdraw from the criminal justice process			<input checked="" type="checkbox"/>
Time taken for domestic and sexual abuse cases to be completed			<input checked="" type="checkbox"/>
Satisfaction with criminal justice system support			<input checked="" type="checkbox"/>

Please add any comments you wish to make in the box below:

- While we agree with the Outcomes and Key Priority areas in this Pillar the draft Strategy is too high level and does not contain any meaningful detail, clear actions or targeted outcomes. It is therefore impossible to determine how the Outcomes and Key Priority areas will deliver meaningful change for victims and survivors or meet its stated Vision and Aim.
- It is also impossible to determine how the Departments will know they are making a difference from the limited amount of information given in the draft Strategy. It is weak on detail and substantive actions that will enable measurement of any positive change.
- While this pillar makes reference to the gendered nature of domestic and sexual abuse it does not contain any specific actions to address this. There is no point in acknowledging that victims are more likely to be female and perpetrators are more likely to be male without detailing how actions will be targeted to specifically tackle this.

- The draft Strategy acknowledges that many domestic and sexual abuse offenders are repeat offenders. This must be taken into consideration with regards to engagement of perpetrators in behaviour programmes. It is in their best interests to positively engage with these programmes. However, care is needed to ensure that engagement by the perpetrator with these programmes is not to be rewarded without the necessary assessment as they are often highly methodical and manipulative individuals.
- The Gillen Review contains more than 200 recommendations that could drastically change the experiences of victims/survivors within the judicial process. A timetable to implement the recommendations from the Gillen Review should be published and actioned urgently.
- This pillar does not mention working with victims and survivors to learn from their experiences of the justice system. The criminal justice system must be truly victim and survivor centred. Listening to their lived experiences of dealing with the criminal justice system should be at the heart of making the necessary changes required to systems and processes. Resourcing must be made available to do this work.
- This pillar does not mention intersectionality yet it is vitally important to address the needs and barriers experienced by different groups of people within the justice system, including women, children, disabled people, ethnic minority groups and LGBTQI+ people.
- We support the call from our colleagues in NSPCC for a refocus of the Strategy on children – including much greater prioritisation on the prevention of abuse and violence against children, addressing all forms of violence and abuse experienced by children and meeting the needs of child victims.
- There is no mention of funding within this pillar. The people of Northern Ireland deserve a robust, fully funded Domestic & Sexual Abuse Strategy. Without the necessary funding to input into the Outcomes and Key Priority areas there will

be no chance of making a difference and achieving the Vision and Aim for the Strategy.

“They can do a course, say they’ve done it and they’re all good now and then go on to do it again.”

“The way you are treated through the courts makes a big difference – a kind word, a smile it makes all the difference.”

Question 9: Do you have any further comments that you wish to make about the draft Domestic and Sexual Abuse Strategy? If so, it would be helpful if you reference which part of the document you are commenting on.

Yes

No

If yes, please add any comments you wish to make in the box below:

Gendered Nature of Domestic and Sexual Abuse

While abuse and violence can be perpetrated by women against men domestic and sexual abuse are highly gendered with women being much more likely to be victims and men more likely to be offenders. The statistics around this are noted in the consultation at pages 15 and 17 and there are a number of other references to the fact that women are disproportionately affected by domestic and sexual abuse. However, the draft Strategy contains no actions around how this might be specifically addressed.

The draft Strategy includes a quote (at page 18) which states: *“We need to start looking at policy and strategy through a gendered lens rather than a one size fits all”*, yet proceeds to disregard this statement as there is no attempt to take a gendered lens to developing the outcomes, key priority areas or measurement of progress.

The Gender Equality Strategy Expert Panel report¹⁹ highlights the harm that results from decades of gender-neutral policy making. As we highlighted in our response to the Call for Views:

“A gender-neutral policy-making approach exists in Northern Ireland and has prevented progress on tackling gender-based violence and misogyny. The issue of gender neutrality acts as a significant barrier to women’s equality and major reforms are needed in order to make progress in this area.”

Funding

The draft Strategy acknowledges that the Call for Views stressed the importance of longer-term, sustainable funding and a costed delivery plan in order to fully implement the strategy and its action plans (pages 34 and 35).

We again wish to stress that without the appropriate funding across all the pillars and action plans there is no chance of achieving the Vision and Aim of this Strategy. We do not wish to see another Strategy produced which does not make a difference to people’s lives especially on an issue of such importance. It is imperative that this Strategy is properly resourced to make the changes needed to ensure that everyone can live without fear and that perpetrators are effectively held to account.

“There needs to be funding for services so that people know where to get help in these situations and the help is available when they ask for it.”

Women’s Economic Disadvantage and Domestic and Sexual Abuse

Gendered social norms restrict and limit women’s roles in the economy, thereby contributing to women’s economic disadvantage relative to men.²⁰ Added to this the impact of a decade of austerity and welfare reform policies that have disproportionately impacted on women. This lack of economic independence and economic disadvantage can make women more vulnerable to abusive relationships.

¹⁹ Gender Equality Strategy, Expert Advisory Panel Report, December 2020
[Gender Equality Strategy \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/gender-equality-strategy)

²⁰ Violence against Women and Girls and women’s economic inequality, Eva Neitzert , March 2020
<https://wbq.org.uk/wp-content/uploads/2020/07/Violence-and-womens-economic-equality.pdf>

With the social security system increasingly not providing a reliable safety net, women's vulnerability to violence is heightened. Women who can't find £100 at short notice are **3.5 times more likely to experience economic abuse**. Without access to the economic resources required to leave and live independently, victims stay with abusers for longer and experience more harm as a result.²¹ The Cost of Living Crisis is making this even more difficult and is trapping women in abusive relationships.²² The links between economic stability and safety are therefore very clear.

We raised issues around women's economic disadvantage in our response to the Call for Views but the draft Strategy does not address this issue at all. Despite the Cost of Living Crisis and the welfare reform agenda being the wider environment within which this Strategy will operate there is no acknowledgement of these issues or any proposed actions around this.

Online abuse

While the Strategy acknowledges that abuse can be online (page 16) there is very little focus on this aspect of abuse throughout the Strategy. Women disproportionately experience online abuse and this is a topic which is often in the headlines but for which there seems to be very few solutions put forward. Academic commentators have coined the term 'networked misogyny' to describe 'an era that is marked by alarming amounts of vitriol and violence directed toward women in online spaces.'²³

PSNI statistics show rising levels of online abuse much of it directed at women. Within the total of online crime, online sexual offences have shown a large volume increase of 218 from 2014/15 to 2021/22²⁴ with females representing 74% of victims

²¹ [What we do - Surviving Economic Abuse](#)

²² [Cost-of-living crisis trapping women in abusive relationships, charity says - BBC News](#)

²³ Online trolling and abuse, Northern Ireland Assembly Research and Information Service, June 2021 <http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2017-2022/2021/justice/5121.pdf>

²⁴ <https://www.psni.police.uk/sites/default/files/2022-12/Police%20Recorded%20Crime%20in%20Northern%20Ireland%201998-99%20to%202021-22.pdf>

in 2021/22.²⁵ It is likely that this is a hugely underreported issue due to issues around embarrassment and fear of coming forward.

In terms of children, the statistics show that child sexual abuse offences involving an online element have increased by over 55% in the last four years to 263 in 2021/22. The PSNI has stated that the number of children subjected to online sexual abuse could be much higher than reported as it is often underreported with many children unaware that they are being manipulated.²⁶

These statistics and the fact that we increasingly live in an online environment with inadequate protections means that much more emphasis needs to be placed on the whole area of online abuse. While the Strategy includes online abuse in the definition of sexual abuse there is no attempt to include any actions or priorities around this issue. We suggest that it is absolutely critical to address online abuse within all the pillars of this Strategy.

Raise Your Voice

WSN is proud to be a partner in the 'Raise Your Voice' project²⁷ alongside our colleagues in the Women's Resource & Development Agency (WRDA), Reclaim the Agenda and the Northern Ireland Rural Women's Network (NIRWN). Raise Your Voice is a project to tackle sexual harassment and sexual violence across Northern Ireland. This project is doing vital work in local communities to raise awareness and to educate people on how to identify, challenge and prevent this type of behaviour. We believe that this type of work is invaluable in addressing the issues of sexual harassment and sexual violence in society.

As we stated in our response to the Call for Views we want to see this type of community-based work developed and adequately resourced so that it can support and complement the Domestic and Sexual Abuse and Violence Against Women and Girls Strategies. Projects such as Raise Your Voice are crucial in helping to achieve

²⁵ [Police Recorded Crime in Northern Ireland 1998-99 to 2021-22.ods \(live.com\)](#)

²⁶ [Reports of online child sexual abuse in NI rise by 80% - BBC News](#)

²⁷ <https://www.raiseyourvoice.community/>

some of the outcomes and key priority areas under the Partnership and Prevention Pillars of the draft Strategy including raising awareness of domestic and sexual abuse, empowering people to safely challenge attitudes, beliefs and behaviours that foster domestic and sexual abuse, educating and building capacity, knowledge and skills to promote understanding about consent and healthy relationships and enabling people to identify and respond effectively to domestic and sexual abuse.

The following feedback from the evaluations of the Raise Your Voice project highlights the need that exists for this project, the value of the project in terms of personal education/knowledge, wider education and awareness raising and the real need which exists for the dissemination and mainstreaming of this information.

“I recognised some of my own actions in the past in the examples that were used, something I’m very ashamed of and made me uncomfortable. However, this is not a negative aspect of the workshop, it is vitally important that myself and men like me are able to recognise these instances and aspects of our behaviours so we can change them.”

“Educate, educate, educate! It is clear that societal norms are changing and we all need to understand what’s acceptable and what’s not. Such a workshop - short, focused, factual is a very good form of education. Thank you for running it. Perhaps it should be made mandatory in workplaces and schools.”

“Strongly recommend for youth groups, schools, colleges, councils, places of work etc. Everyone should participate in such workshops. Fantastic thanks so much!”

“This information needs to be mainstreamed. As a parent I think this type of awareness raising is vital as older attitudes are very prevalent here. I feel that girls and women cannot be left to do this work on their own. It needs to be available to everyone and on an inter-generational basis.”

“I would love to see this workshop as part of the school curriculum, it would open the topic out and plant a good seed for thought in young people’s minds.”

Women's Centres Work

As stated in our response to the Call for Views we wish to highlight the importance of organisations that work with victims and survivors including local Women's Centres. Women's Centres provide trusted, local spaces where victims can disclose abuse and seek help. Women's Centres are able to provide trauma sensitive advice and signposting to victims in relation to taking action to leave abusive relationships and to pursue legal remedies. Additionally, Women's Centres provide education and courses in areas such as personal development and confidence building and trauma counselling which can help victims make the necessary changes in their lives. Frontline services delivered through these organisations complement statutory and other voluntary sector provision ensuring that women and their families have access to the information, advice and support they need in these situations.

However, funding is a major issue for Women's Centres who often have to rely on a cocktail of funding often from different departments either directly or through their agencies and through charitable sources. These funds have been subject to austerity cuts and the Centres have also seen increased overheads due to Cost of Living pressures. At the same time the Centres have seen increasing demand for their services as women and families struggle as a result of the pandemic and with rises in the Cost of Living.

It is vitally important that these organisations have long-term sustainable funding to continue to provide these important information, education and prevention services and to develop and enhance their services for victims/survivors into the future.

“I've had counselling through the Women's Centre for the domestic abuse I suffered. A lot of people here need counselling as a result of the Troubles – they need to talk about the traumas that went on in families. The Troubles were not normal – they bring with it a certain acceptance of violence.”

“People don't report and years later they realise what they were going through was wrong. A lot of people don't know this stuff if they are not coming to places like Women's Centres and they don't know the law.”

“The Women’s Centre has given me purpose. Some ways I think I would have seen what was happening to me sooner [domestic violence] if I had been at the Women’s Centre earlier. Through working here and attending courses it has empowered me.”

“You isolate yourself in a domestic abuse situation. When you come out into the Women’s Centre and hear other people’s experiences you know you are not on your own and the support is there. It helps you to identify these things that are wrong.”

“Mental abuse is really hard. I moved to Northern Ireland with my ex-partner and we had two kids. He used the car and I was never in it. I just had to stay at home with the kids. He took me across here and tried to isolate me from my family and friends. The Women’s Centre helped me. I did a building confidence course and it literally built me up and helped me to leave him. Because of what I had been put through by my ex I had therapy and it has given me a toolbox for dealing with him so now I know how to handle his behaviour. He was gas lighting me and controlling me which was making my life difficult and isolating me.”

“People are treated well in the Women’s Centre. It builds up a sense of community with lots of support and care. There are a lot of people who use the Centre from abusive relationships. Sometimes you can’t confront the issue head on if they are not able to deal with it. Sometimes you have to come around the issue and the person and let them feel safe and be accepted and when they are ready the Centre is there to support them.”

“The first time I came to the Women’s Centre I was very low after coming out of a bad relationship. In the first class I attended I didn’t want to talk. But now I see such a difference in myself for the better. I had low confidence and self-esteem but coming to the Centre has built me up. I knew after coming here that I was in an abusive relationship where he threatened to kill me. I never reported it. When I leave the Centre at the end of the day I feel part of a caring, supportive, motivated environment.”

Rape Crisis Service

The Rape Crisis Service for Northern Ireland provides trauma informed emotional support for those impacted by rape and sexual violence in adulthood. This is an essential non-time limited service for all whether reporting or not, waiting on counselling, waiting on outcomes of court cases and in particular provides support

for those whose cases are not being taken forward based on decisions made by PSNI or PPS not to proceed.

The Rape Crisis Freephone line is open four evenings a week to take self-referrals for one-to-one support and to provide information and sign-posting for victims/survivors, families members and others in need.

Referrals for support are also made through other stakeholders such as the Rowan centre and ASSIST NI. Additional funding support should be made available to 'roadmap' the range of services currently available, how they interlink, how and when they can be accessed/availed of depending on whether a case is being legally pursued or not, linking Rape Crisis, ASSIST NI, SOLAs and counselling through Nexus.

Volunteer Support workers for Rape Crisis are encouraged from across Northern Ireland to ensure that services are not Belfast/Antrim centred and welcome the breadth of the new ASSIST NI services. However, additional funding for neutral, safe venues to provide one-to-one support in every County should be made available. Rape Crisis works through local women's centres and community organisations to provide this where possible but there is an urgent need for additional spaces with flexible opening hours.

Funding discrepancies for service providers such as Rape Crisis NI have particular impacts for marginalised women using this service, such as minority ethnic women, who may require specialist support and translators. Without adequate funding, this specialist support cannot be given which creates barriers for marginalised women. Additional funding for partnership working/training will remove these barriers.

All Rape Crisis NI Support Workers are asked about any additional languages they may have to reduce language barriers where possible but additional training with, for example, the Anaka Women's Collective and the Migrant Centre NI would ensure wider linguistic and cultural support for migrant women. Due to the nature of the

service, translation services are not ideal, which is why it is essential to have trained support workers across all communities such as migrant, Traveller and LGBTQI+.

Wider impacts of Domestic and Sexual Abuse and the need for joined-up working

Many issues can arise from domestic and sexual abuse. Its effects can be widespread cutting across many different areas and government departments, for example, housing, social security, education, health, employment, etc. Unless all these services and departments are working together in a holistic way then it will not be possible to tackle this problem effectively. Joined-up services, partnership working and the availability of adequate resources to work effectively across departments is vital to ensure that victims are given the complete range of protections and help they need in order to escape abuse and live the rest of their lives to their full potential.

Domestic and sexual violence and abuse leads to high social and economic costs for women, their families and societies. Putting in place holistic protections and supports across a range of areas has huge potential not only for the wellbeing and healing of victims but for children's health and wellbeing, the health service, the economy, justice, etc. It would not only prevent much pain, suffering and loss but save money across a range of services.

“How many women are dealing with health problems from the abuse they suffered? It also has mental health impacts and impacts on children – this is all costly for the health service.”

Question 10: Do you agree with the outcome of the Rural Impact Assessment and Equality Impact Assessment?

- Agree
- Disagree
- Don't Know

Please add any comments you wish to make in the box below

The EQIA states that *“the draft strategy is likely to have an overall positive impact and is **not expected to have any differential impact based on gender.**”* This is despite stating on a number of occasions throughout the document that women are more likely to experience domestic and sexual abuse. As we have repeatedly stated in our response the draft Strategy contains no actions or measures to address the gendered nature of this abuse. It is important that in acknowledging that women are more likely to be victims that the Departments develop specific and targeted actions are to tackle this.

The EQIA also states that the draft strategy is likely to have an overall positive impact and is **not expected to have any differential impact based on sexual orientation, disability or racial group.** We would dispute this assertion that it is not expected to have any differential impact given the barriers that have been acknowledged for these groups elsewhere in the document. This includes barriers to reporting, seeking support, under-reporting, lack of knowledge, fear, language difficulties, learning difficulties, higher risk of abuse and victimisation due to disability, etc. It is important that in acknowledging that these groups are more vulnerable to domestic and sexual abuse that the Departments develop specific and targeted actions to tackle this.

The Rural Needs Assessment states *“we anticipate that the outcomes will have a positive impact for people in rural areas. **We do not consider that they will impact on people in rural areas differently from people in urban areas.**”* This is despite the fact that the document later goes on to acknowledge that engagement with stakeholders has shown *“that there are distinct challenges faced by victims of domestic abuse in rural areas.”* This includes physical isolation, heightened stigma in close-knit communities, fear, risk of harm from firearms on farms, financial abuse, increased travel times/costs and limited escape routes. We also suggest that rural dwellers suffer greater from access poverty in relation to the centralisation of support services which also exacerbates social isolation.