



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

Response to: Consultation on a Strategic Framework to End Violence Against Women and Girls and Foundational Action Plan

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Foyle Women's
Information
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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 appreciates the opportunity to respond to the Consultation on a Strategic Framework to End Violence Against Women and Girls and Foundational Action Plan. While abuse, harm and violence can be perpetrated by women against men it is disproportionately experienced by women and girls with women being much more likely to be victims and men more likely to be offenders. We welcome the fact that the Strategic Framework recognises this and sets out the journey to achieve transformational change.

1.5 We wish to endorse the response made by the Women's Policy Group (WPG) of which we are a member. We fully endorse their response and support their valuable and informative survey evidence and their comments on the Strategic Framework and Action Plan. We also support and reiterate the WPG statement in relation to this consultation: *"The WPG would like to commend the TEO EVAWG Team for all of the hard work and dedication that went into making this Draft Strategic Framework as strong as it is and congratulate them on facilitating such as positive and rewarding co-design experience."* We also wish to endorse the response from our colleagues in Women's Platform in relation to the International Mechanisms. We join Women's Platform in urging for CEDAW to be recognised as an international obligation of the UK that provides the framework for effective action on gender equality.

1.6 The Women's Regional Consortium also endorses the following statement prepared by the NIWBG and Ulster University:

Gender Budgeting requires government departments to analyse the different impact of a budget on people of different genders, starting as early in the budget cycle as possible. The aim of gender budgeting is to ensure that the distribution of resources creates more gender equal outcomes. Over time, gender analysis should become embedded at all stages of the budget process. Women's intersecting identities are also included in this analysis and policy-makers are expected to promote these areas of equality as well. There is widespread political support for gender budgeting in Northern Ireland and a growing evidence base that it can help create a more equal society. In the current budget crisis women will experience particular disadvantages due to the pre-existing socio-economic conditions. For example, there is strong evidence that women have suffered disproportionately from over a decade of Westminster austerity measures, the pandemic, and the cost-of-living crisis². We cannot afford to continue making decisions at the expense of women and risk further degradations to gender equality and additional intersecting equalities as well.

Not only is there an immediate need for gender budgeting in our current crisis, but the benefits would help to improve the budgetary process. Gender budgeting is good budgeting; it encourages greater transparency of government processes, more in-depth assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures will create a firewall to prevent such disproportionate disadvantages in future.

² MacDonald, E.M. (2018) The gendered impact of austerity: Cuts are widening the poverty gap between women and men. British Politics and Policy at

LSE. <https://blogs.lse.ac.uk/politicsandpolicy/gendered-impacts-of-austerity-cuts/>

Charlton, E. (2023) This is Why Women are Bearing the Brunt of the Cost of Living Crisis According to Research. World Economic Forum. <https://www.weforum.org/agenda/2023/01/cost-of-living-crisis-women-gender-gap/>

We recognise that the current equality screening and impact assessment duties under Section 75 provide policy infrastructure that could be used to progress gender budgeting. The EQIA process allows space to identify budget impacts on women and opportunities to promote more gender equal outcomes. However, too often the analysis included in these documents focuses only on equal treatment or stops at the point of acknowledging pre-existing inequalities. For gender budgeting to be fully implemented, the next stage must be to reformulate budgets and budgetary policy with targeted measures to improve outcomes for women and girls.

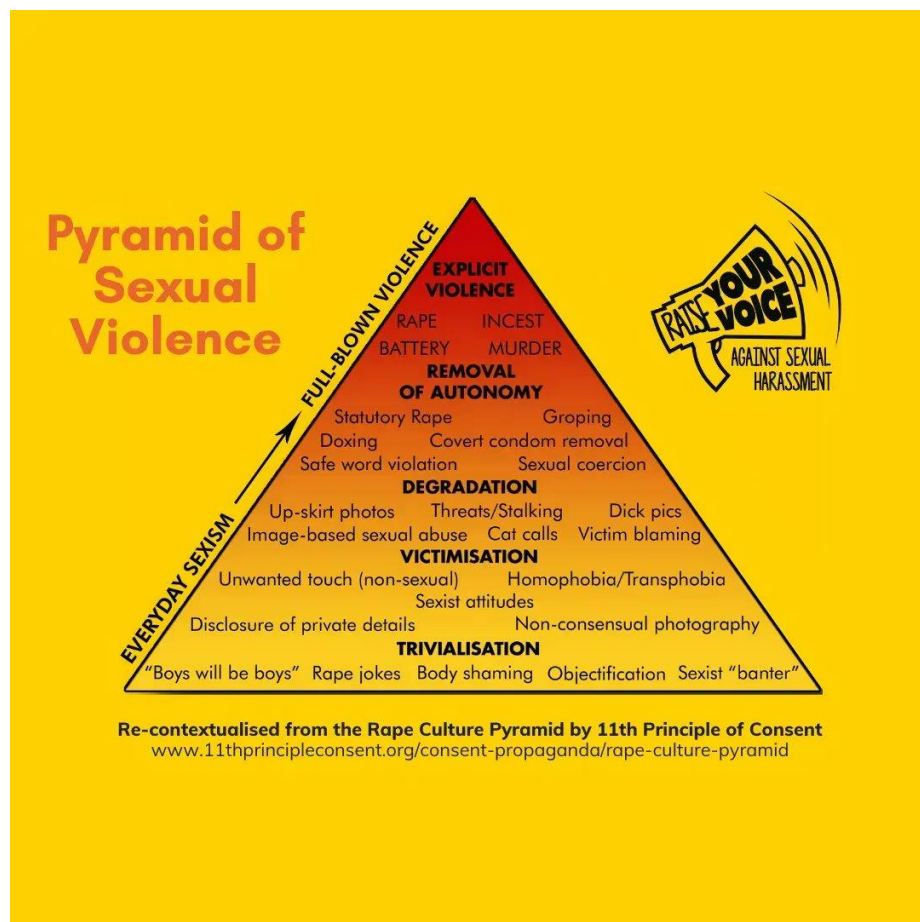
Additionally, Section 75 screening and impact assessment typically takes places at the very end of the budget planning process or after the budget has been finalised. The OECD³ highlights that best practice for gender budgeting is to embed it at all levels of policy- and budget-making: planning, formulation, approval, implementation, monitoring and reformulation. It is crucial that gender equality obligations are not a 'tick-box exercise' but rather that gender equality is mainstreamed in every area of the budgetary process through gender analysis of data supported by experts from civil society.

³ OECD (2023), OECD Best Practices for Gender Budgeting, *OECD Journal on Budgeting*, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

2.0 General comments

VAWG is a public health problem and a violation of women's human rights. It has a gendered motivation, gendered power dynamics and gendered vulnerabilities. This violence can have hugely negative impacts for women impacting on their overall wellbeing, sense of safety and freedom and on their physical, mental and sexual health.

Womens experiences of violence and harassment exists on a continuum which includes everyday sexism and street harassment through to assault and sexual offences. These behaviours are illustrated on the 'Pyramid of Sexual Violence' (taken from Raise Your Voice project – see Section 2.7) which shows how everyday behaviours like 'banter' and sexist jokes bolster up the culture of misogyny. It shows how common attitudes and beliefs uphold and form the basis for more extreme acts of sexual violence. It is clear therefore, that action must be taken to end these misogynistic behaviours which enable and encourage sexual harassment and sexual violence.



2.1 Recent Research on VAWG

There is no shortage of research which highlights the prevalence of VAWG in Northern Ireland in all its forms. This research shows just how extensive this problem is and details a range of harmful behaviours likely to have long-term, negative implications for victims' health and wellbeing as well as negative implications for our local communities and society as a whole.

The 'Every Voice Matters!' report⁴ found:

- 98% of women interviewed said that they had experienced at least one form of gender based violence or abuse in their lifetime;
- seven out of 10 of those surveyed had experienced some form of violence or abuse in the last 12 months;
- Half of those (50%) experienced at least one form of violence or abuse before they were 11 years old.

The 'It's just what happens' report⁵ found:

- The persistent nature of 'everyday violence' with almost all the girls and young women who participated in the research experiencing catcalling and street harassment from age 10-11 onwards;
- Girls receiving frequent unsolicited messages and sexual images from a young age. They considered this a normal part of their online life.

A study into online VAWG carried out by the Open University⁶ found significant levels of online violence experienced by women and girls across the UK. In relation to Northern Ireland the findings show that:

- 27% of women in Northern Ireland witnessed online violence.

⁴ Every Voice Matters! Violence Against Women in Northern Ireland, September 2023
[Research Publication: Every Voice Matters! Violence Against Women in Northern Ireland | The Executive Office \(executiveoffice-ni.gov.uk\)](#)

⁵ 'It's just what happens' Girls' and young women's views and experiences of violence in Northern Ireland, September 2023
[IT'S JUST WHAT HAPPENS' Girls and Young Women's Views and Experiences of Violence in Northern Ireland \(executiveoffice-ni.gov.uk\)](#)

⁶ [OU research reveals shocking level of online violence experienced by women and girls across the UK | The Open University](#)

- 14% of women in Northern Ireland who experienced online violence say this progressed to offline violence.

Growing Up Online in NI⁷ a new report by Stranmillis University College found that more girls than boys were exposed to harmful content online making it clear that more needs to be done to protect girls in particular from online risk or harm:

- girls are much more likely to experience something nasty or unpleasant online, both among younger girls aged 8-13 (23% girls vs 17% boys) and older girls aged 14-18 (20% girls vs 15% boys);
- Girls aged 14-18 were 3 times more likely (5.4%) than boys (1.7%) to be asked to send nude photos/videos of themselves;
- Girls (6.9%) were more than twice as likely as boys (3%) to be sent inappropriate photos they didn't ask for, and twice as likely to see or be sent pornography (girls: 5.6% vs boys 3.0%).
- Girls were also more likely to see or be sent content promoting self-harm (girls: 3.3% vs boys 2.2%), eating disorders (girls: 4.1% vs boys 1.6%) or suicide (girls: 3.6% vs boys 3.0%).

Survey evidence produced by the Women's Policy Group in 2022⁸ into VAWG showed the following key findings:

- 91.2% of women think that Northern Ireland has a problem with men's violence against women and girls;
- 97.2% of women think that Northern Ireland should have a strategy to tackle men's violence against women and girls;
- 83% of women have been impacted by men's violence against women and girls but only 21.4% reported this to the police and 77.4% of those did not find it useful;
- 89.7% of women believe Northern Ireland has a problem with attitudes of sexism and misogyny;

⁷ [Growing Up Online in NI: new report highlights children's online activities, dangers and opportunities - Stranmillis University College | A College of Queen's University Belfast](#)

⁸ <https://wrda.net/wp-content/uploads/2022/04/WPG-VAWG-Research-Report.pdf>

- 81.2% of women believe there is stigma surrounding issues of violence against women and girls;
- 92.3% of women think that there are barriers to reporting men's violence against women and girls;
- 95.2% of women think that reducing levels of violence against women and girls requires focusing on changing men and boys' behaviours and actions;
- 86.8% of women think that there needs to be a review of how the justice system treats victims and survivors of men's violence against women and girls;
- 82% of women first experienced men's violence before the age of 20.

New findings from the Women's Policy Group on women's experiences and attitudes towards reporting VAWG in Northern Ireland⁹ showed the following:

Experiences of violence

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

Police Reporting

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

⁹ 'After Violence: Attitudes and Reporting VAWG', Key Findings Report, Women's Policy Group, September 2023

[Microsoft Word - VAWG Survey Findings 2023 \(wrda.net\)](https://www.wrda.net/microsoft-word-vawg-survey-findings-2023)

Court system

- Only 9% of women think that courts in NI take VAWG seriously.
- 31.5% of women who have experienced VAWG engaged with the court system.
- 54.5% of women who engaged with the courts were not satisfied with the outcome.

Alternative forms of justice

- 77% of women think convicted offenders of VAWG should take part in a rehabilitation program.
- 61% of women were unsure if mediation and other forms of alternative justice are working.

2.2 International Obligations

CEDAW's General Recommendation 35¹⁰ on gender-based violence against women outlines how gender-based violence against women “*occurs in all spaces and spheres of human interaction, whether public or private, including in the contexts of the family, the community, public spaces, the workplace, leisure, politics, sport, health services and educational settings, and the redefinition of public and private through technology-mediated environments.*”¹¹ The Recommendation spells out carefully the general *obligations of states parties* under CEDAW in relation to gender-based violence against women.¹² 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

¹⁰ 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

¹¹ Ibid, para 20

¹² Ibid, para 21

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 the jurisdiction of the State party, noting with particular concern the inadequacy of laws and policies to protect women in Northern Ireland.”¹³ CEDAW recommended that the UK “Adopt legislative and comprehensive policy measures to protect women from all forms of gender-based violence throughout the State party’s jurisdiction including Northern Ireland.”¹⁴

Alongside our colleagues in Women’s Platform, the Women’s Regional Consortium urges for CEDAW to be incorporated into domestic law as recommended by several of the CEDAW Concluding Observations. Recognising CEDAW would create effective links across Departments and Strategies which can act as mechanism for creating a coherent framework for addressing violence against women and girls. As a minimum the CEDAW recommendations should inform policy and decision making to ensure the UK remains in line with international law and good practice on gender equality.

In November 2022 the UK became the 37th State to ratify the Istanbul Convention¹⁵ which aims to prevent all forms of violence against women, protect those who experience it and prosecute perpetrators. This has committed the UK Government to follow 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

¹³ 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

¹⁴ Ibid, para 30(b)

¹⁵ 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>

mandates work with men and boys to change cultures, attitudes and behaviours and provides detailed guidance on the development of judicial systems and responses.¹⁶

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.¹⁷

The head of UN Women, Sima Sami Bahous, said that *“violence silences women, renders them invisible, pushes them from public space.”*¹⁸ This in turn directly hinders progress on the 2030 Sustainable Development Agenda, which aims to lift people out of poverty and create a more equal, sustainable world free from gender inequality.

2.3 Women’s Economic Disadvantage

Gendered social norms restrict and limit women’s roles in the economy, thereby contributing to women’s economic disadvantage relative to men.¹⁹ Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work and also more likely to be providing care either for children or other family members which limits their ability to carry out paid work. This contributes to keeping women’s incomes generally lower over their lifetimes and therefore means they are more likely to be dependent on men or the State through social security benefits. This lack of economic independence can make women more vulnerable to gender based violence.

The social security system has a vital role to play in easing the impact of poverty on people and families. However, welfare reform and austerity measures have tended

¹⁶ 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](#)

¹⁷ Preventing Violence Against Women through Formal and Informal Education: Article 14 of the Istanbul Convention, Council of Europe, March 2022

[1680a5c70d \(coe.int\)](#)

¹⁸ <https://news.un.org/en/story/2022/03/1113992>

¹⁹ 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>

to limit the ability of the system to protect against poverty.²⁰ Many of these changes have had more negative impacts on women than men. The House of Commons Library reported that 86% of the savings to the Treasury from the tax and benefit changes since 2010 will have come from women.²¹ Locally an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)²² showed that across most income levels the overall cash impact of the reforms is more negative for women than for men.

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

Research by the Women's Regional Consortium on the impact of austerity²³ and on the impact of Universal Credit²⁴ on women shows the extent to which changes to the social security system have worsened their ability to provide for their children and families and made them more vulnerable to financial hardship and poverty. Poverty is one of the main risk factors for violence against women and girls and with the social security system increasingly not providing a reliable safety net, women's vulnerability to violence is heightened.

²⁰ Protecting dignity, fighting poverty and promoting social inclusion in devolved social security, Dr Mark Simpson, Ulster University, June 2018
http://www.niassembly.gov.uk/globalassets/documents/raise/knowledge_exchange/briefing_papers/series_7/simpson060618.pdf

²¹ Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017
<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

²² Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019
https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

²³ Impact of Ongoing Austerity: Women's Perspectives, Women's Regional Consortium, March 2019
<http://www.womensregionalconsortiumni.org.uk/sites/default/files/Impact%20of%20Ongoing%20Austerity%20Women%27s%20Perspectives.pdf>

²⁴ The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020
<http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

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

2.4 Debt and Paramilitary Lending

Low-income households are more likely to have to rely on high-cost credit as they are often unable to access cheaper forms of borrowing due to their low-income and/or other debts. Some of the most vulnerable borrowers are forced into using illegal lending or 'loan sharking' because of a more urgent need for money. In Northern Ireland illegal lending is often linked with perceived paramilitary activity.²⁵ Information from the Police Service of Northern Ireland (PSNI) suggests that paramilitary groups (both Loyalist and Republican) continue to be involved in illegal money lending/loan sharking however it is rarely reported to the police.²⁶ This is a hugely difficult area to gather statistics or evidence on as it is often a hidden form of borrowing due to the underlying fear and secrecy surrounding this type of credit.

Research by the Women's Regional Consortium²⁷ with local women in Northern Ireland showed a number of examples of borrowing through loan sharks including paramilitaries. It revealed that 6% of the women who took part in the research had borrowed through illegal lenders such as loan sharks including paramilitaries. Women were more reluctant to talk about this type of lending as they understood it is a more dangerous form of borrowing and many were too afraid to discuss it at all.

²⁵ Expensive Lending in Northern Ireland, Centre for Economic Empowerment, NICVA, May 2013
https://www.nicva.org/sites/default/files/d7content/attachments-resources/cee_expensive_lending_in_northern_ireland_2013.pdf

²⁶ Annual Report & Threat Assessment 2020/21, Organised Crime Task Force, February 2022
<https://www.octf.gov.uk/files/octf/2022-02/octf-annual-report-and-threat-assessment-2020-21.pdf>

²⁷ Making Ends Meet: Women's Perspectives on Access to Lending, Women's Regional Consortium, February 2020

[Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf](https://www.womensregionalconsortiumni.org.uk/Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf)
[womensregionalconsortiumni.org.uk](https://www.womensregionalconsortiumni.org.uk)

There was a general acceptance among the women that the consequences of this type of borrowing could be very scary.

Research²⁸ has noted that there is a continued reluctance within communities in Northern Ireland to speak to the authorities about this type of lending due to fears that they could be labelled an 'informer' and therefore invite reprisals. This was echoed in Women's Regional Consortium research²⁹ which also found that those who borrowed from these lenders were reluctant to be seen to be 'touts'.

Research by the University of Ulster found that Universal Credit was repeatedly described as a driver for illegal lending³⁰ particularly around the harm caused by the five-week wait and issues with short-term benefits loans that were repaid from future benefits.

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

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

²⁸ Illegal Money Lending and Debt Project, Research Report of Findings, Ulster University and the Consumer Council, March 2020

[Illegal_Money_Lending_Report.PDF \(consumercouncil.org.uk\)](https://www.consumer-council.org.uk/wp-content/uploads/2020/03/Illegal-Money-Lending-Report.pdf)

²⁹ Making Ends Meet: Women's Perspectives on Access to Lending, Women's Regional Consortium, February 2020

[Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf \(womensregionalconsortiumni.org.uk\)](https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2020/02/Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf)

³⁰ Illegal Money Lending and Debt Project, Research Report of Findings, Ulster University and the Consumer Council, March 2020

[Illegal_Money_Lending_Report.PDF \(consumercouncil.org.uk\)](https://www.consumer-council.org.uk/wp-content/uploads/2020/03/Illegal-Money-Lending-Report.pdf)

those on the lowest incomes and can help to divert people from illegal lending such as paramilitaries.

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

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

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

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

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

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

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

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

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

2.5 Women and the Cost-of-Living Crisis

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

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

Research by the Women’s Regional Consortium on the impact of the Cost-of-Living Crisis on women³¹ has shown the following:

- 96% of women felt their financial situation was worse than it was the previous year;
- 91% of women reported difficulty paying their bills as a result of Cost-of-Living increases;
- 90% of the women felt that the Cost-of-Living Crisis had impacted on their physical or mental health or both;
- 78% of the women had felt cold or hungry or both as a result of cost of living increases;
- Just over half of the women reported being in debt (56%) and of these 82% reported they had to borrow as a result of Cost-of-Living increases;

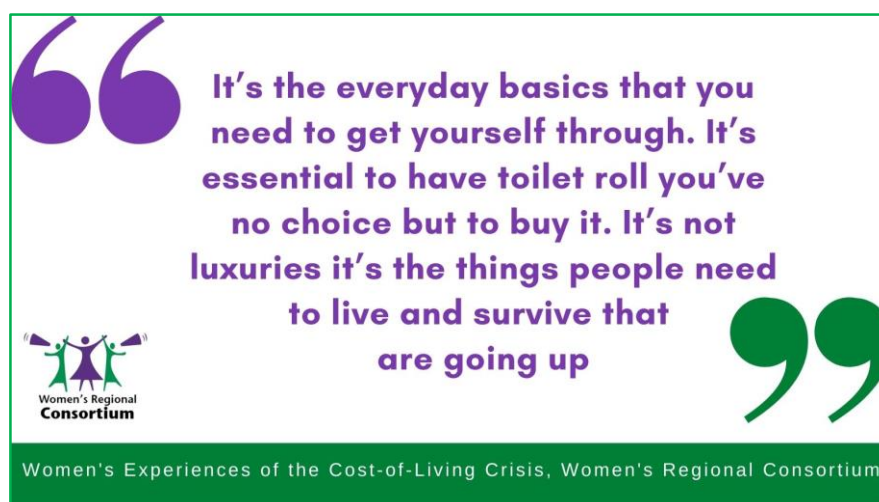
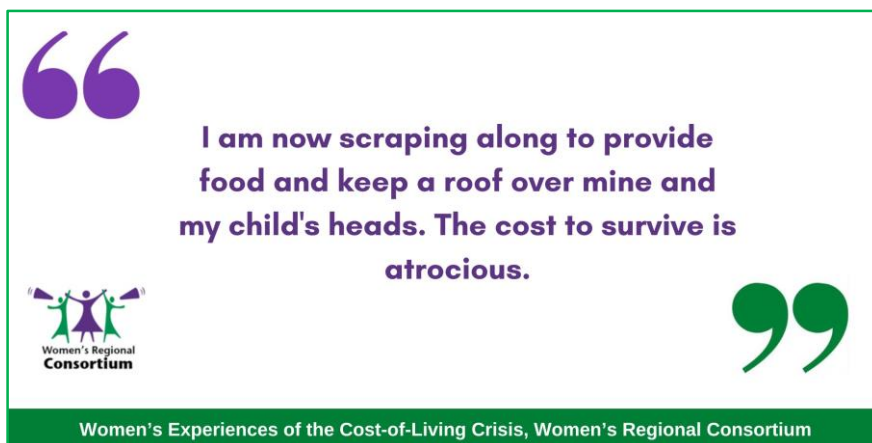
³¹ Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, Women’s Regional Consortium, June 2023

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>


- 41% had needed to use a foodbank/other charitable support due to increases in the cost of living.

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

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




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



Women's Regional Consortium

Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium


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



Women's Regional Consortium

Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium

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



Women's Regional Consortium

Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium

2.6 Investment in Support Services

Women and girls are disproportionately affected by violence, abuse and intimidation in Northern Ireland. From April 2021 to March 2022 they made up 78% of all victims of sexual crimes, 68% of domestic abuse, 64% of harassment and as of April 2022, 95% of stalking crimes.³² More recent figures from the PSNI show that the number of sexual offences reported in Northern Ireland between April 2022 and March 2023 reached the highest level on record. There were 4,232 incidents an increase of 4.7% on the previous year. The number of rapes recorded between April 2022 and March 2023 also increased by 2% on the previous year from 1,243 to 1,272.³³

These figures point to the urgent need for increased funding for specialist services to meet growing demand for help and support from victims and survivors. It is essential that these services receive secure funding which keeps pace with increases in the cost of living so that they can offer holistic support to those affected and continue to grow and develop their services.

It is important that victims can get access to holistic information, advice and support across all the range of issues they may have when they need it and in the format they need it. It is vitally important that this is provided in the right way and at the right time so that victims are not put off taking action about their situation.

In addition to information and support after experiencing abuse there is a need for continued support even after the abuse has stopped or a case has finished. For many victims the trauma does not stop when the abuse ends or the court case is over. Many victims feel a 'cliff edge' afterwards with no access to further support and services even though it is needed.

³² <https://www.psni.police.uk/latest-news/police-service-northern-ireland-launches-first-action-plan-tackle-violence-against>

³³ <https://www.psni.police.uk/system/files/2023-05/1401700191/Police%20Recorded%20Crime%20Bulletin%20Period%20Ending%2031st%20March%202023.pdf>

There is also a need to provide clear advice and information for people who witness sexual harassment and violence so they know and understand what to do in these cases. They need to be aware of what action they can take to help and support victims and also how to report it. Very often people who witness this type of behaviour are reluctant to take action for fear of making things worse for the victim. They need to have the necessary information and advice so they know what action to take in these circumstances.

“Part of the Strategy needs to address how to help victims after they get out of their abusive situation – they need help after too.”

“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.”

“For many it takes time to process and deal with these issues. Many are not ready to deal with it straight away. It gets blocked out until they get some breathing space then it all comes out. There is a need for support down the line too – people often need support later on.”

Government also has International Obligations with regards to the Protection and Support of victims and survivors. Article 22 of the Istanbul Convention³⁴ states that: *“Parties shall take the necessary legislative or other measures to provide or arrange for, in an adequate geographical distribution, immediate, short- and long-term specialist support services to any victim subjected to any of the acts of violence covered by the scope of this Convention.”* Article 25 of the Convention states that: *“Parties shall take the necessary legislative or other measures to provide for the setting up of appropriate, easily accessible rape crisis or sexual violence referral centres for victims in sufficient numbers to provide for medical and forensic examination, trauma support and counselling for victims.”*

³⁴ 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+CV+2005.pdf)

Rape Crisis NI

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, family members and others in need.

A poster for the Rape Crisis NI Information & Support Line. The background is a soft, out-of-focus image of a person's profile looking upwards. In the top left corner is the Rape Crisis NI logo, which consists of a teal circular graphic with the text 'Rape Crisis' and 'Northern Ireland' below it. To the right of the logo, the text 'INFORMATION & SUPPORT LINE' is written in large, bold, black capital letters. Below this, the phone number '0800 0246 991' is displayed in a large, bold, black font. To the right of the phone number, the operating hours are listed: 'Mon: 6pm-8pm', 'Tues: 6pm-8pm', 'Wed: 6pm-8pm', and 'Thurs: 6pm-8pm'. Below the hours is the website address 'www.rapecrisisni.org.uk'. At the bottom right, the tagline 'Listening, Believing & Support for All' is written in a smaller, italicized font.

Referrals for support are also made through other stakeholders such as the Rowan centre and ASSIST NI. Additional funding support is needed 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. However, additional funding for neutral, safe venues to provide one-to-one support in every county is needed. 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.

Precarious funding 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 these women. Additional funding for partnership working/training would help to remove these barriers, for example, training with the Migrant Centre NI would ensure the availability of 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 including migrant, Traveller and LGBTQI+.

Long-term sustainable investment is urgently needed for organisations such as Rape Crisis NI. This would ensure the provision of 24/7 specialist support for those impacted by sexual violence and abuse. This would help to ensure that survivors know that no matter when or where their abuse happened there is someone who will listen to them, believe them and provide the appropriate help, support and signposting. The provision of round-the-clock specialist support would ensure that survivors get the right response first time which is key to recovery after abuse.

Providing support 24/7 would also help to lead to an improvement in reporting and convictions of sexual offences and ensure that more perpetrators are brought to justice. When victims feel believed and supported they are much more likely to engage with and stay in the criminal justice process. Providing access to round-

the-clock specialist support will provide the support survivors need as well as ensuring that more criminals are brought to justice for these crimes.

Women's Centres Work

The services delivered by Women's Centres and groups across Northern Ireland provide a lifeline to local people in disadvantaged and rural areas. They provide wrap-a-round services that support not only the woman but the whole family.

Services include personal development and confidence building, trauma counselling, adult training & education, signposting, programmes and initiatives that support women and families in domestic violence and sexual violence situations in addition to providing a full range of childcare.

In addition to the range of services provided in Women's Centres, these are trusted local organisations that women and families are more likely to turn to or accept being referred to for support and advice at times of stress and difficulty. 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.

In order to be able to deliver community-based frontline services in disadvantaged and rural areas women's centres and groups must secure a cocktail of funding, often from different departments either directly or through their agencies and through charitable sources. However, since 2012 these funds have been subject to austerity cuts which has resulted in little or no funding for overheads and in some cases a reduction in funded staff hours.

Many of the Centres have seen increasing demand for their services as women and families struggle as a result of the Cost-of-Living Crisis. In addition, their running costs have doubled but there has been no increase in their budgets for running costs to meet these increases. Additional support is needed to help community organisations, such as Women's Centres, who are providing vital support in disadvantaged communities to continue to meet rising costs.

These vital services delivered locally by community organisations such as Women's Centres and supported by the work of the Women's Regional Consortium are vital to tackling disadvantage and promoting gender equality. These local services which support statutory provision are the most cost effective way of ensuring that local needs are met and ensures the best outcomes for the communities they serve. Much greater value must be placed on these unique and trusted services which provide holistic support for women and their families including in violent and abusive situations. In order to continue these vital services, they need to have long-term, sustainable funding for this work.

“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 if I had been at the Women's Centre earlier. Through working here and attending courses it has empowered me.”

“The Women's Centre is brilliant. It not only focuses on physical health but mental health. Self-development courses, facilitators and Centre users are all invested in creating an atmosphere where people feel welcome and safe. It's a very caring environment.”

“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 things that are wrong.”

2.7 Raise Your Voice

WSN is proud to be a partner in the 'Raise Your Voice' project³⁵ alongside our colleagues in the Women's Resource & Development Agency (WRDA) (lead partner), 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

³⁵ <https://www.raiseyourvoice.community/>

Northern Ireland. This endemic problem will be approached in a variety of ways through working directly with the community, increasing public awareness, educating organisations on best practice and lobbying for legislative advances in this area.

Raise Your Voice was funded by the Rosa Fund for Women & Girls and Time's Up UK. It was launched in August 2019 and provides workshops on sexual harassment and violence, consent, victim blaming, digital/online abuse, allyship and bystander intervention. The goal of the project is to create true cultural change in order to tackle the root causes of these behaviours and empower people to act to change this in their own lives and communities.

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 essential in addressing the issues of sexual harassment and sexual violence in society.

There is a clear need for the continuation of this project given the levels of sexual harassment and sexual violence that exist in Northern Ireland. The success of this project and the interest and demand for workshops serves to highlight the need for work in this area and that there is a strong case for developing and extending this work.

We would like to see this type of community-based work developed and adequately resourced so that it can support and complement the Violence Against Women and Girls and Domestic and Sexual Abuse Strategies. As previously outlined any new legislation and Strategies are only as good as the knowledge, training and education around them and we believe that projects such as Raise Your Voice are crucial in helping to achieve this.

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.”
(Raise Your Voice Workshop participant)

“The trainer’s knowledge and expertise is obvious and I have been challenged by what’s been talked about. I’ll be sitting down with my son (who is 16) and watching the videos with him.”
(Raise Your Voice Workshop participant)

“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.”
(Raise Your Voice Workshop participant)

“Strongly recommend for youth groups, schools, colleges, councils, places of work etc. Everyone should participate in such workshops. Fantastic thanks so much!”
(Raise Your Voice Workshop participant)

“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.”
(Raise Your Voice Workshop participant)

“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.”
(Raise Your Voice Workshop participant)

3.0 Specific Questions

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

(Required)

Please select only one option

- ☐ A member of the public. (Please proceed to question 2.)
- ☒ On behalf of an organisation. (Please proceed to question 8.)

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

(Required)

Women's Regional Consortium

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

(Required)

Please select only one option

- ☐ Central government
- ☐ Local Government
- ☐ Statutory body (e.g. health, education, transport, housing etc.)
- ☐ Private sector
- ☒ Charity / Community / Voluntary sector
- ☐ Other (Please specify in the box below)
- ☐ Prefer not to say

Strategic Framework

10. Do you agree or disagree with our vision?

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

Please select only one option

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

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

We agree with the vision outlined in the consultation and very much welcome the fact that the vision, framework and action plan were co-designed with people and organisations across Government and society representing different backgrounds and perspectives and crucially including those with lived experience. This has resulted in a strong and ambitious vision. As the consultation document rightly points out this will require everyone to play a part in realising the vision. It is therefore imperative that this vision goes beyond the aspirational and there is real progress on the actions arising from this framework, not just words.

We are also pleased to see that the draft vision includes structural inequalities. It is impossible to separate out incidences of sexual abuse and violence from the issue of gender inequality and existing power imbalances within society. Gender inequality is the background to which sexual violence and all violence against

women and girls takes place. Rigid gender roles and harmful gender norms which perpetuate inequitable power relationships disadvantage women and are the root cause of violence against women. There is a need to understand that violence against women and girls is both a cause and consequence of gender inequality. Promoting and achieving gender equality is therefore a critical element of the prevention of violence against women.

A gender-neutral policy-making approach has been the norm 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 we are pleased that this framework acknowledges that gender-based violence, abuse and harm is disproportionately experienced by women and girls and rooted in gender inequality.

We wish to stress that without the appropriate funding across all the Outcomes detailed in the consultation document it will be impossible to achieve this vision. We are concerned about how this can be progressed given the collapse of the Northern Ireland Assembly and Executive. It is imperative that adequate funding is achieved to tackle this systemic and ingrained problem, to ensure that women and girls can live without fear and that perpetrators are held to account. As a society we have waited so long to get a VAWG Strategy but if we do not have the funding to carry out the actions in the Strategy then it will be worthless and put even more pressure on services that are already stretched to the limit.

What is Gender-based violence?

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

Outcome 1 - Changed Attitudes, Behaviours and Social Norms. Everyone in society understands what violence against women and girls is, including its root causes, and play an active role in preventing it.

Please select only one option

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

Please add any comments you wish to make regarding Outcome 1 in the box below.

We agree that Outcome 1 will help to achieve the vision as set out in this framework. However, Northern Ireland is a socially conservative and patriarchal society which this provides an important context for Outcome 1. It is also important to recognise that Northern Ireland's violent history has meant greater levels of acceptance of violence and abuse. Paramilitarism and the threats from paramilitary gangs still present a real danger in our society. Violence and coercive control against women is an intentional and organised strategy used by paramilitaries protected by a culture of silence around these issues. Poverty is a significant factor in allowing paramilitaries to thrive meaning they can step in and meet the needs of desperate people in desperate times.³⁶ In some cases Government policies can contribute to keeping women in poverty and this fits with the 'structural inequalities' that cause gender based violence and harm as outlined in the draft vision – see further in Section 2.4.

“As a country we are very focused on traditional values and often Northern Ireland is behind other areas. We have a different attitude about speaking out and people are less likely to be vocal about things. It's very community orientated here and everybody knows everybody else which makes it harder to speak out.”

³⁶ <https://cooperationireland.org/projects/strategic-support/far-from-post-conflict-a-gendered-analysis-of-paramilitary-coercive-control-in-northern-ireland-madeleine-hughes/>

It is therefore critical to ensure a better understanding of what gender-based violence is. Many people understand this to be attacking someone physically on the street or domestic abuse but do not understand the full range of manifestations that gender-based violence and abuse can take. This means that some people do not realise they are the victim or perpetrator of violence against women and girls which is important in terms of both recognising and challenging these behaviours.

There is a clear need for education and clear communication around what gender-based violence is, the root causes and behaviours which allow it to develop and continue and how these might be tackled. It will be difficult to get buy in to the Strategy without a better understanding of what it is. We believe there is significant work to be done in these areas to ensure that attitudes to violence against women and girls are changed in Northern Ireland.

“Young men often copy how their fathers behaved – quite often violence is accepted behaviour or learned behaviour.”

“Many are conditioned to behave certain ways towards women and girls because that is what they have seen from their parents and that is all they know.”

“Women also need to be educated on what is acceptable behaviour in relationships otherwise they end up putting up with it.”

“If you don’t know about abuse how can you seek help and support to do something about it.”

Violence against women and girls is endemic throughout our society and requires widespread cultural change to address it effectively. It requires action across many areas and involves the work of many Government departments and Strategies which all must work together in a holistic way to achieve the end goal which is the eradication of this violence in our society. Wider cultural change is needed across all levels of society including in schools, health services, transport, business, the police and judicial systems, etc. Investment must be made in prevention work and changing harmful societal attitudes. Joined-up

services, partnership working and the availability of adequate resources to work effectively across departments is therefore vital to achieving the vision as set out in this framework.

As we have previously stated gender inequality is the background to which violence against women and girls takes place and therefore promoting and achieving gender equality is a critical element of the prevention of this violence.

“The root causes are from societal expectations of people to be a certain way. This has allowed these sexist comments, slapping people on the bum, etc. Nobody is focusing on these things as they are just allowed to happen and then it becomes expected behaviour.”

The approach to ending violence against women and girls must take a human rights based approach for all women and not one that focuses on safety. Women and girls have the right to move freely, express themselves and take part in activities without the fear of harassment and violence. Yet the onus is often put on women and girls to take action to keep themselves safe. The same effort is not directed to those perpetrating harassment and violence that their behaviour must stop and this needs to change.

Key to Outcome 1 is work with men and boys to tackle everyday sexism and understand the impact of harassment and violence against women and girls. Men and boys need to understand the consequences of their actions not only on the victim but on the actions of women and girls in society more generally. They need to understand how everyday sexism trivialises this type of behaviour and leads to a culture of acceptance and normalisation. There is also a need to provide men and boys with the skills to take action on these issues so that intervening in these situations is normalised and they have the knowledge, vocabulary and courage to do so.

Work with men and boys must include education through comprehensive, standardised Relationships and Sexuality Education (RSE) in schools from an early age. This must be accompanied by the widespread availability of further

training around sexual harassment, consent, digital/online abuse, allyship and bystander intervention like that provided by the Raise Your Voice project – see section 2.7. Education work with men and boys should be carried out in a positive, non-judgemental way providing safe, supportive spaces for education, awareness raising and discussion about difficult subjects.

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

Outcome 2 – Healthy, Respectful Relationships. Everyone in society is equipped and empowered to enjoy healthy, respectful relationships.

Please select only one option

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

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

The Women's Regional Consortium believes that education is key to Outcome 2 and in achieving the draft vision. We believe that comprehensive Relationship and Sexuality Education (RSE) standardised across all schools which takes into account the full range of relationships is vital to aid prevention of violence and abuse. Young people need to be educated on what constitutes a healthy relationship and they need to be taught about consent with the aim of addressing behaviours that can lead to violence and abuse. It is also important that any new curriculum for RSE is fully inclusive of LGBTQI+ relationships.

The expert panel for the Gender Equality Strategy said that RSE in schools in Northern Ireland is “*inconsistent and insufficient*”.³⁷ The expert panel called for RSE which is fit for purpose and inclusive of the experiences of all young people³⁸ and that it should take account of the CEDAW Recommendation³⁹ 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.*”

We are pleased to see the UK Government updating the requirements for the RSE curriculum in Northern Ireland making “*age-appropriate, comprehensive and scientifically accurate education on sexual and reproductive health and rights, covering prevention of early pregnancy and access to abortion, a compulsory component of curriculum for adolescents.*”⁴⁰ However, there are concerns about the provision to allow parents to opt their children out of some parts of the RSE curriculum and about current misinformation campaigns⁴¹ which seek to undermine progress in this area. If this results in large numbers of children being excluded from the full RSE curriculum, then this will jeopardise work on Outcome 2 and the realisation of the draft vision.

RSE is not just necessary for children and in schools it is necessary throughout life and particularly for those who have missed accessing this education. Further education institutions, Universities, workplaces, sporting and other social clubs should all be part of this education work. That is why projects such as Raise Your Voice are so vital (see Section 2.7) in ensuring the provision and availability

³⁷ <https://www.bbc.co.uk/news/uk-northern-ireland-56378106>

³⁸ 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>

³⁹ 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

⁴⁰ [New requirements for Relationship and Sexuality Education curriculum in Northern Ireland - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-requirements-for-relationship-and-sexuality-education-curriculum-in-northern-ireland)

⁴¹ [Relationships and Sexuality Education \(RSE\) in Northern Ireland: What's happening? - FactCheckNI](https://www.factcheckni.org/relationships-and-sexuality-education-rse-in-northern-ireland-what-s-happening/)

of education and awareness on these issues to ensure that everyone in society is equipped and empowered to enjoy healthy, respectful relationships.

“Education is important for boys in terms of them having respect for women and girls and how they should be treated. But education is also important for girls. They need to be able to recognise when relationships are bad and abusive.”

“There needs to be education around the way women are spoken about. We had a team come into work to talk about issues around how women are spoken about, respect and the issue of pornography which is so readily available. It is so easy to get hold of on mobile phones now – that makes men think it’s OK to treat women in this way.”

“There is a lack of awareness of what a healthy sexual relationship is. A close friend of mine had to tell me that I was in a dangerous situation and I didn’t realise it. My partner would hold me by the neck when we were being intimate and I didn’t realise how dangerous this was. If they behave this way there is a greater chance of actual violence. I always thought I was quite aware of the ways of the world and modern life but I wasn’t aware of this. I had just excused it as something he liked to do.”

“There is a need for education from a very young age including young boys and pre-teens about all these issues.”

“There is a need to go into schools and for this 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.”

“There is a need to keep repeating the right messages through school life – if it’s just once it’s not enough. This education needs to be developed every year. It should start off really young in nursery with age appropriate messages and continue throughout school life.”

“When it crosses the line these behaviours need to be addressed but then whoever is doing it just says ‘I was only joking’”

“The way women are treated comes from a lack of respect – women are treated as if they are a possession. Women are seen as the ‘weaker sex’ and when a man does something to a woman he says he didn’t mean it or he’s had too much to drink. There’s always an excuse for it.”

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

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

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

Please select only one option

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

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

We wish to stress how critical cross-departmental working and taking a holistic view of women and girls safety is to achieving the draft vision. This is not just the responsibility of TEO but involves all Government departments working together with a true understanding of the impact of their actions on the safety of women and girls.

We raise a couple of recent examples which will have negative impacts on women's safety and feelings of safety. An Equality Impact Assessment (EQIA) consultation by the Department for Infrastructure⁴² made proposals to cut street lighting in response to a constrained Budget from the Secretary of State for Northern Ireland. If this proposal was to go ahead it would have

⁴² <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/eqia-consultation-document-budget-2023-24.pdf>

greater adverse impacts for women and girls in the context of endemic violence against women and girls. The fact that this was even suggested as an option shows a distinct lack of awareness/priority of the issues surrounding violence against women and girls.

A further example is given by an EQIA into changes to the Discretionary Support Scheme.⁴³ Discretionary Support provides support to people in crisis or emergency situations providing important financial help for essential living expenses. The consultation outlines that the Discretionary Support budget will be cut in half since last year. Women amount for 67% of those in receipt of Discretionary Support Grants. Decisions on cuts to important areas of help such as Discretionary Support have impacts for on the safety of women by reducing the options they have to meet their essential needs and increasing the potential for them to face violence and abuse. As the Women's Regional Consortium outlined in our response⁴⁴ to this consultation we have serious concerns about increases in paramilitary lending as a result of cuts in this crisis support particularly during a Cost-of-Living Crisis. We have already outlined in Section 2.4 the increased potential for harm, particularly for women, leaving them more vulnerable to abuse and violence if they are forced into using illegal and paramilitary lending.

The examples detailed above highlight the 'structural inequalities' that can contribute to gender based violence, abuse and harm as outlined in the draft vision. There is a real need to identify and remove these structural inequalities which can exacerbate the problem and inhibit progress on tackling it.

There is no one-size-fits-all approach to making women feel safe and be safe. Every woman's experience of violence and abuse is shaped by many

⁴³ <https://www.communities-ni.gov.uk/sites/default/files/consultations/communities/dfc-changes-to-the-discretionary-support-scheme-egia.pdf>

⁴⁴ [Womens-Regional-Consortium-Response-to-DfC-Discretionary-Support-EQIA.pdf](https://www.womensregionalconsortiumni.org.uk/Womens-Regional-Consortium-Response-to-DfC-Discretionary-Support-EQIA.pdf)
([womensregionalconsortiumni.org.uk](https://www.womensregionalconsortiumni.org.uk))

different factors with many facing intersecting forms of discrimination based on race, sexual orientation, disability, ethnicity, age, etc. An intersectional understanding of women's lives and safety will help to ensure that all women feel safe and are safe. For example, LGBTQI+ women will often feel less safe reporting violence and abuse because they are afraid of revealing their sexuality to police or other organisations. Specialist services will be essential in ensuring support for all women including specialist workers within the PSNI and criminal justice system to help with reporting and pursuing cases.

Safety and feeling safe includes the physical environment that women live in. This includes everything from street lighting as previously mentioned to the built environment, accessibility issues, planning policies, public spaces, transport, etc. We reiterate the importance of all Government departments and service providers working together to take action to prevent violence against women and girls and a desire to eradicate it from society through their policies and actions. We raise an example highlighted by our colleagues in the Women's Policy Group around public transport. Despite other parts of the UK having public awareness campaigns on unwanted sexual behaviour and sexual harassment such as Transport for London⁴⁵ there has never been a similar campaign by Translink in Northern Ireland. This also raises concerns about how well staff are trained on how to handle issues around sexual harassment and sexual violence on public transport.

Safety and feeling safe is also not just about the physical environment but about the attitudes, actions and policies of organisations including social services, the PSNI and the justice system. These services and organisations also need to feel safe for women to come forward, to feel safe sharing their experiences and to know that they will be believed and supported. Unfortunately, this has not been the experience of many women and girls and a culture of victim blaming still pervades many of these systems. While

⁴⁵ <https://tfl.gov.uk/info-for/media/press-releases/2021/october/new-campaign-launches-to-stamp-out-sexual-harassment-on-public-transport>

work is ongoing to shift this culture there is still much work to be done in this area.

There are distinct challenges faced by victims of violence against women and girls in rural areas. This includes physical isolation, heightened stigma in close-knit communities, fear, increased travel times/costs and limited escape routes. Rural women and girls suffer greater from access poverty in relation to the centralisation of support services which also exacerbates social isolation. Our Consortium partners, the Northern Ireland Rural Women's Network (NIRWN) have consistently raised issues around violence against women and girls and farms. Many rural women live in houses built on their spouse's family land and farm and are often surrounded by his family members' homes leaving them in an even more difficult situation for accessing help and support when experiencing violence and abuse.

It is clear that much more needs to be done to protect women and girls from online harm. Levels of online abuse against women and girls prompted the creator of the internet, Sir Tim Berners-Lee, to say that *"the web is not working for women and girls."*⁴⁶ He said that while the world has made important progress on gender equality he is *"seriously concerned that online harms facing women and girls – especially those of colour, from LGBTQI+ communities and other marginalised groups – threaten that progress."* Sir Tim said that *"for many who are online, the web is simply not safe enough"* and that online abuse *"forces women out of jobs and causes girls to skip school, it damages relationships and leads to tremendous distress. Relentless harassment silences women and deprives the world of their opinions and ideas, with female journalists and politicians pushed off social media and bullied out of office."*

Locally, we have seen the issue of online harm for girls highlighted in 'Growing Up Online in Northern Ireland' – see Section 2.1. This report

⁴⁶ Why the web needs to work for women and girls, Sir Tim Berners-Lee, March 2020
<https://webfoundation.org/2020/03/web-birthday-31/>

recommended that more needs to be done to protect girls in particular from online risk or harm through education and a joined up approach which promotes healthy relationships both on and offline for both boys and girls. The report recommended that *“content relating to healthy online relationships should become mandatory, not least given the growing prevalence of toxic masculinity and online pornography, and the negative impact this is having on boys’ attitudes, language and behaviour towards girls.”* The report stated that the evidence presented in their study serves to justify and inform the ongoing work of TEO in developing a much needed EAWG Strategy.

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

Outcome 4 – Quality Frontline Services, Protection, and Provision for Victims and Survivors of Violence Against Women and Girls. Provision of high quality services for women and girls who are victims and survivors of violence against women and girls.

Please select only one option

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

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

Providing access to high quality, victim-centred services is important in helping women and girls address the violence they face and start the recovery process. There is much more that needs to be done to ensure that

women are supported to take action against violent behaviours. Without adequate and timely support many will be deterred from taking action and may continue to suffer from this violence. We have detailed the critical importance of specialist services for victims and survivors of violence against women and girls in Section 2.6.

Statistics show that women and girls are disproportionately affected by violence and abuse pointing to the need for increased funding for specialist services to meet the growing demand for help and support from victims and survivors. Funding should be provided on a long-term, sustainable basis to allow these specialist organisations to meet demand, cope with inflationary pressures and develop holistic services in response to the needs presented. There is also a growing need for the further development of services for complex and additional needs such as substance misuse and mental health issues.

Funding is one of the major problems faced by frontline organisations. There is a great need to value this specialist work through long-term, sustainable, ring-fenced funding to ensure that specialist services are able to provide the support victims and survivors need. Without the necessary funding organisations who provide services and support for victims and survivors will lurch from one funding crisis to another and struggle with staff retention and longer-term planning. There is an urgent need to guarantee the long-term provision of these life-saving services.

We know that existing specialist services for women facing violence and abuse are overstretched, in some cases unable to cope with demand or have insufficient funding to provide the full range of services they know are needed. Our colleagues in Women's Aid no longer receive core funding from the Department of Health despite rising demand for their services (since end September 2023). It is the only Women's Aid Federation in the UK which does not receive funding from local Government.

The Rape Crisis service in Northern Ireland is available through a telephone helpline and only for certain hours in the week subject to funding. Physical rape crisis centres and 24/7 helpline and online chat services are available in other areas to ensure that victims and survivors get the services they need when they need them and in the way they need them.

Services for victims and survivors of violence against women and girls should be commissioned using the 'by and for model' to reflect the communities they are supporting. This should include services for more marginalised women including migrants, asylum seekers and refugees, women with disabilities and LGBTQI+ women.

Victims of sexual abuse and violence require specific and appropriate mental health services provided by people/organisations trained in these areas. Counselling services are under significant pressure and victims and survivors often need access to specialist counselling services urgently following their experience. Specific funding should be allocated for appropriate, safe and rapid therapeutic services to victims of sexual violence and abuse.

We also wish to highlight the importance of other organisations that work with victims and survivors including local Women's Centres. These organisations provide information and education on the signs of abuse and help victims to identify these types of behaviours. They provided 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. It is also vitally important that these organisations have long-term sustainable funding to continue to provide information, education and prevention services and to develop and enhance their services for victims/survivors into the future.

“The Women’s Centre helped me. I did a building confidence course and it literally built me up and helped me after experiencing abuse.”

“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 abuse. 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. When I leave the Centre at the end of the day I feel part of a caring, supportive, motivated environment.”

Wider issues of under-resourcing and the capacity of public services also have impacts in this area, for example, problems accessing GPs, waiting lists for the NHS, etc. These services are an important part of the picture in supporting victims and survivors and this is also a consideration for Outcome 4.

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

Outcome 5 – A Justice System which has the Confidence of Victims, Survivors and the Public in its Ability to Address Violence Against Women and Girls. In the context of violence against women and girls, a justice system that considers and addresses the needs of people who come into contact with it, holds perpetrators to account, while challenging and supporting them to change, gives victims and survivors a voice and a place in the process, and has the confidence of the public.

Please select only one option

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

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

We strongly agree with this Outcome however this is not the justice system we currently have and there is much work to be done to ensure that it achieves the transformation needed to reflect this Outcome. New research by the Women's Policy Group⁴⁷ gives significant cause for concern in terms of having a justice system that has the confidence of victims and survivors to address this issue. The research showed that:

- Only 9% of women think that courts in NI take VAWG seriously
- 54.5% of women who engaged with the courts were not satisfied with the outcome
- Only 27% of women who had experienced VAWG disclosed this experience to the police
- Only 22% of women feel comfortable reporting VAWG to the police
- 67% of women who have experienced domestic abuse did not report it to the police or take legal action
- 63% of domestic abuse victims who reported it to the police or took legal action said that this was a negative experience.

⁴⁷ 'After Violence: Attitudes and Reporting VAWG', Key Findings Report, Women's Policy Group, September 2023
[Microsoft Word - VAWG Survey Findings 2023 \(wrda.net\)](https://www.wrda.net/)

There has long been a general acceptance that reform of the justice system is needed as all too often the system fails victims who need to take action against violence and abuse. It does not effectively hold perpetrators to account while victims are left to live with the trauma for the rest of their lives and is unable to handle serial perpetrators a clear sign that it is not supporting them to change their behaviours. The system is also beset by unacceptable delays and a culture of disbelief and victim blaming is evident throughout the policing and criminal justice system preventing women and girls from accessing justice. All these problems deter victims from reporting incidents and when they do report often leaves them feeling failed by the justice system.

“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.”

The justice system must be truly victim and survivor centred. That means a system of wrap around supports from the moment victims come forward to seek support and disclose abuse and an end to the current piecemeal approach. Listening to the lived experiences of victims and survivors in dealing with the criminal justice system should be at the heart of making the necessary changes required to systems and processes. Victims must know that they will get the right response first time and that their case will be treated with the respect and seriousness that it deserves. Resourcing must be made available to do this work.

Trust in the justice system and willingness to report can vary significantly across different groups of women, for example, migrant and refugee women who are subject to hostile environment policies, transgender women and sex workers. A lack of trust in the justice system and a fear of reporting in case of further victimisation are all barriers to interacting with the system. It is clear that the justice system as a whole must do more to consider and

address the needs of all people who come into contact with it but particularly with those women who are the most marginalised and fearful of the system. Work with perpetrators and perpetrator programmes should be a mandatory part of the system. These programmes and the availability of counselling services to deal with any other issues that perpetrators may have must be resourced, developed by experts and provided to all perpetrators to maximise the chances of rehabilitation and reduce instances of repeat offending. Work with voluntary and community sector partners is important in this area and again must be valued and resourced. For example, Windsor Women's Centre started an initiative with the Probation Service and Women's Aid in 1992 called Men Overcoming Violence (MOVE) which still continues today as the Building Better Relationships programme.

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

“My partner did a perpetrators course and did counselling through work – those things should be more widely available as they helped him.”

“Perpetrators are not getting long enough sentences for some of these things. There isn't enough of a deterrent against this sort of behaviour.”

“Perpetrators often suffered from physical abuse when they were younger – violence begets violence.”

““There is a need to look at the root cause of the problem – why the abuser has become an abuser. It would be beneficial if they were forced to go through some kind of therapy but this only works if they recognise they have a problem and they want to be there.”

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

Outcome 6 – All of Government and Society Working Better Together to End Violence Against Women and Girls. A whole system approach with collaboration and cooperation by default across government departments and with, within and between the community, voluntary and other sectors.

Please select only one option

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

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

Alongside our colleagues in the Women's Policy Group we have some concerns over the use of the word "better" in this Outcome. Better is a subjective word and can mean different things to different people. In this context, better could mean a small amount of working better together would qualify as being successful when in reality there is significant work needed in this regard. There is a need to quantify this to ensure that it is both measurable and sufficiently ambitious to help achieve the draft vision.

We agree that a whole system approach is needed and that this must involve collaboration and cooperation within and across Government departments and with the community and voluntary sector. As we have previously stated joined-up services, partnership working and the availability of adequate

resources to work effectively across departments and sectors is vital to achieving the vision as set out in this framework.

“Everyone who is involved with victims/survivors needs to be trained on how to deal with these issues and take them seriously – GPs, doctors in hospitals, schools, police, courts, etc.”

We cannot overstate the importance of cross-departmental working in relation to this Strategy. Taking a silo approach to this issue by individual Departments is further contributing to the problem of violence against women and girls. There must be a recognition that all Government departments have a role to play in helping to achieve the draft vision. Therefore, the actions of one Department should not create the structural inequalities that cause violence, abuse and harm. We have referenced a number of examples where cuts to current social security provision are increasing the structural inequalities that cause more women and families to live in financial hardship and poverty, a key risk factor in experiencing violence and abuse – see our answer to Question 13.

We have welcomed the fact that this is a gender specific strategy which acknowledges the fact that women are more likely to be victims. However, this has not been the approach taken by other Departments where there is considerable overlap with this work, for example, the Domestic & Sexual Abuse Strategy by the Department of Justice and the Department of Health which fails to take a gendered lens to the actions in the Strategy. It will be important for TEO to consider how it works with other Departments on related Strategies which do not take the same approach to the gendered nature of these issues.

There are many ways in which working across Departments would be to the benefit of this Strategy and in the achievement of the draft vision. Examples include the need for joined up working with the Department of Education on

RSE, with the Department of Justice on Ending Paramilitarism, with the Department of Infrastructure on Town and City Planning to name but a few.

We stress the need for true partnership working which values collaboration with other sectors including the voluntary and community sector which has done so much work in this area. The work of the community and voluntary sector must be valued as part of this process and not simply viewed as an add-on or a tick-box exercise. Many of the organisations working in the community and voluntary sector have years of experience in working with victims and survivors of violence and abuse and also in working with perpetrators. They are often experts in this work and their views and experiences must be listened to. They are expert 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 funded as such not in the piecemeal way that it currently is.

We raise the issue of Gender Budgeting here as referenced in Paragraph 1.6 of this response. If Government committed to gender budgeting this would mean that decisions to spend or not spend in certain areas would be taken to ensure a more equal society. This would also help to ensure that organisations working in this area were not under-resourced as funding would be distributed to create more gender equal outcomes. Gender Budgeting encourages a more targeted approach to the spending of public money which will improve policy outcomes. It provides decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality.

***“The work of the women’s sector and women’s centres is not valued.
We are just fed crumbs of funding.”***

***“We are working in partnership with local Government on a project but
they have no sense of what is required on the ground to make it work.
They just don’t understand how it works at community level.”***

“True partnership working can make a massive difference but the way it works with Government now is not partnership it is Government trying to dictate what’s happening. It is not a level playing field. There’s partnership and there’s partnership – Government are just using the partnership but they don’t truly see community organisations as a partner. They don’t get it at all.”

“The community needs to have a bigger role in this – there’s trust at community level.”

“It needs people working at grass roots level. There needs to be a bottom-up approach so that everyone’s voices will be heard.”

Placing a focus on Prevention

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

Please select only one option

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

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

Prevention of violence against women and girls is better than intervention at a later date when the harms have already been caused. It helps to protect future victims and spare them from the harm, distress and pain caused by violence. A focus on prevention ensures that there are fewer victims and that is clearly ideal for women and girls as a whole but also means reduced need for support services and use of the criminal justice system in the long-

run. Prevention work is cost-effective ensuring that less money is spent on dealing with the out workings of violence against women and girls and reduces the impacts on wider society. It reduces the impact on other services such as health, education and justice reducing the cost to the economy.

Draft Foundational Action Plan

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

Please select only one option

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

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

As the Action Plan states it sets out a “*foundation of activity to get things started.*” It recognises the challenging budgetary environment we are living in and given the lack of resources outlines the actions which can be taken to get this work underway. The actions listed are positive and we are in agreement that they provide a good place to start given a lack of funding. However, in an ideal world it should start with the most urgently needed interventions, regardless of the cost.

Ultimately, there is a need for adequate funding to be provided for the Strategy. As we have previously stated without the appropriate funding it will be impossible to achieve the draft vision outlined in the consultation. We are

concerned how this can be progressed without a local Assembly and Executive. We have waited so long to get a VAWG Strategy but if it does not have the necessary funding attached it will not result in the desired change and a society where women and girls are free from all forms of gender-based violence, abuse and harm.

We support the call by our colleagues in the WPG that TEO should provide clarity over which actions need legislation and which do not. This should include a list of actions which can be taken forwards if we do not have a functioning Assembly and Executive.

It would also be useful to know how TEO intends to measure the success of these actions and the likely timeframes for this.

Impact Assessments

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

Please select only one option

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

We commend TEO for a thorough Draft Equality Impact Assessment using a wide range of available data and research. It is clear that considerable effort has been put into the production of this very detailed document and we

appreciate the commitment to this process. We would like to see other Government departments follow TEO's lead in this regard.

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

Please select only one option

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

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

Once again we commend TEO for a thorough and detailed Equality Impact Assessment including due regard to intersectionality. We strongly agree with the findings of the EQIA and welcome the focus on women and girls. The WPG and Women's Regional Consortium have long advocated for this approach to the development of this Strategy and we thank TEO for taking an evidence-based approach to this issue that recognises it is disproportionately experienced by women and girls and is rooted in gender inequality.

The EQIA could include more information on delays including unacceptable delays within the PPS.