



Northern Ireland  
Women's European Platform

## **Response to the consultations on a draft Outcomes Framework for the Programme for Government and the EQIA of the Outcomes Framework The Executive Office**

**March 2021**

### **1. Introduction**

Northern Ireland Women's European Platform (NIWEP) welcomes the consultation on the Outcomes Framework for the Programme for Government and also the consultation on the EQIA. NIWEP welcomes the opportunity to contribute to these consultations; this response combines a response to both the consultation on the Outcomes Framework and to the EQIA.

NIWEP is a membership organisation of women's NGOs in Northern Ireland. Established as the Northern Ireland link to the European Women's Lobby, the EU's expert body on women's rights and gender equality, NIWEP also has special consultative status with the UN. A key role for NIWEP is promoting gender responsive policy and decision making at local, regional and national level taking account of the state's international obligations, while also ensuring women and girls are engaged in policy and decision making. NIWEP also works to share information and good practice at international level with local members and stakeholders, and highlight local learning and good practice internationally.

NIWEP's core objectives involve raising awareness and promoting implementation of key international human rights treaties and initiatives, including the Convention on the Elimination of All Discrimination against Women (CEDAW). NIWEP views implementing the recommendations of CEDAW as a clear roadmap and mechanism to ensuring women's human rights are fully met and upheld in Northern Ireland. The comments in this submission are made within this context.

For clarity, NIWEP incorporates everyone who identifies as female in the term 'women and girls', and all references to 'women and girls' should be read in this context throughout the submission. NIWEP is also cognisant of the multiple and intersecting inequalities many people, including women and LGBTQIA+ people, face, and is urging for the Programme for Government to engender and establish a fully inclusive framework.

### **Endorsement**

NIWEP endorses the responses of the Committee on the Administration of Justice and the response of the Women's Regional Consortium to this consultation.

## 2. Summary

NIWEP welcomes reference to the Sustainable Development Goals (SDGs) in the consultation document. NIWEP believes that the SDGs should form the basis of the Outcomes, and indeed the Programme for Government itself. The SDGs are agreed as a global compact, which set an international framework for development to 2030 and have been identified by the UN as the cornerstones of a roadmap to sustainable, equitable global recovery from the COVID-19 crisis<sup>1</sup>. In addition, the SDGs are binding on the UK as a whole, as the UK is a state party to the Paris Agreement. Aligning fully this international roadmap would assist Northern Ireland in meeting its obligations under the Paris Agreement, while also providing a robust basis for policy and decision making. Above all, the SDGs are focused on promoting wellbeing for all, which directly aligns with the overall aim of the PfG.

The SDGs are supported by a comprehensive set of indicators, which have been validated and thus can be adopted in Northern Ireland as robust measures for progress. NIWEP would like to emphasise that strengthened data collection is critical for adequate monitoring of progress under the Outcomes Framework. The currently available overview of Northern Ireland data in relation to the SDGs, included as part of the UK's Voluntary National Review of progress towards the SDGs in 2019, highlights significant gaps<sup>2</sup>, and NIWEP would urge for improved data collection relevant to the SDG indicators to be a priority both within the PfG Outcomes Framework and the PfG itself. This is essential in order to ensure services tailored to the needs of the population, and thus to effective and efficient targeting of resources.

NIWEP welcomes the inclusive approach in the draft Outcomes Framework, which states that the outcomes apply to everyone. However, this in itself is not sufficient, but must be accompanied by a clear and comprehensive evidence base indicating the specific needs and issues of different population groups, which provides a starting point for designing, tailoring and delivering services in the most effective and efficient way. In order to do that, undertaking an EQIA provides an opportunity to identify currently available evidence and additional evidence needs, and constitutes a vital tool for informing both decision making and monitoring the Outcomes Framework effectively.

NIWEP welcomes the recognition in the consultation document that countries most successful at dealing with COVID-19 are those that have engaged widely with 'those who have the skills, knowledge and expertise to bring about positive change and to get things done' (Introduction, p.5). NIWEP would welcome an opportunity for civil society to be engaged in the development of a draft Programme for Government, as a sector with significant experience and expertise in developing people focused, equitable solutions. The sector also holds valuable data, including qualitative evidence from service users and stakeholders on their experience of life in Northern Ireland today. Engagement could take the form of dialogue sessions organised as the process develops, and could focus on gathering evidence from civil society to inform the process. Such a process does not pre-empt a public consultation or interfere with policy and decision making authority, but rather contributes to ensuring the fullest and widest evidence base is available to inform decision making. An open dialogue can also contribute to strengthened confidence in the process and strengthened support for the Programme for Government.

## 3. General comments on the draft Outcomes Framework

Overall, NIWEP welcomes the proposed priorities in the draft Outcomes Framework. The elements are appropriate and together, form elements of a society supporting wellbeing for all. However, it is critical to ensure the narrative and sub priorities informing each Outcome are sufficiently nuanced and detailed to consider the complementary needs of different population groups.

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<sup>1</sup> UN (October 2020) [COVID-19, Inequalities and Building Back Better](#)

<sup>2</sup> HM Government (June 2019). [Voluntary National Review of progress towards the Sustainable Development Goals, United Kingdom of Great Britain and Northern Ireland](#)

## Increased focus on women and gender equality

NIWEP would urge for further development of this nuanced approach. In particular, NIWEP is concerned that there is no mention of women and girls anywhere in the document, and no evidence of an understanding of how to prioritise the needs of different population groups to achieve equity for everyone. Strengthened use of currently available data would significantly add to this analysis.

There is a robust evidence base demonstrating the specific needs relevant to each of the priorities outlined above. With regard to issues and priorities for women and gender equality, NIWEP would like to highlight the Feminist Recovery Plan<sup>3</sup> developed by the women's sector, which sets out in detail the impacts of COVID-19 on women and girls, and also sets out key areas for action. It is important to note that the core priorities for women have been similarly highlighted in analyses of the disproportionate impact on women elsewhere; at UK level by civil society<sup>4</sup> and an Inquiry into the gendered economic impact of COVID-19 by the Westminster Women and Equalities Committee<sup>5</sup>, and globally by many actors including the UN<sup>6,7</sup> and the World Bank<sup>8</sup>.

With regard to the Department of Finance, the Department states in the response to the Feminist Recovery Plan that it '*appreciates the call to gender budgeting*'. However, it appears that DFP, similar to most Departments are not clear on the equality responsibilities, stating that there is a *statutory basis for our approach to equality, and difficult to see how we could justify prioritising one area over another*. Some sections of the response to the FRP make no reference at all to gender, notably those on carers, racial justice, a green economy and housing<sup>9</sup>.

Strengthened data collection, with appropriate breakdowns by gender as well as other protected characteristics, is a cornerstone for effective gender budgeting as well as budget analysis, and NIWEP would urge for improved data collection across policy areas to ensure the relevant data is available to underpin decision making. It is important to note that gender budgeting is a tool for evidence based decision making, rather than a mechanism for prioritising one group over others. Gender budgeting at its core identifies the impact of expenditure on different population groups, and therefore assists with ensuring resources are targeted in ways that create the greatest impact and benefit.

## Alignment with the SDGs

Similarly, there is no recognition that the outcomes are interlinked, and that cross cutting action is critical to achieve progress on all outcomes. NIWEP would urge for this interlinkage to be explicitly recognised, to create a robust basis for interdepartmental and cross cutting action. This would also contribute to the implementation of CEDAW, as an international obligation of Northern Ireland, as CEDAW stresses the cross cutting nature of gender equality. The recommendations of the CEDAW Committee are also in line with the SDGs, and will contribute to ensuring both the draft Outcomes Framework is met and Northern Ireland meets its commitment to the SDGs. The CEDAW

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<sup>3</sup> Women's Policy Group (July 2020) [COVID-19 Feminist Recovery Plan](#)

<sup>4</sup> See eg. Women's Budget Group (2021) [Lessons Learned: Where Women Stand at the Start of 2021](#)

<sup>5</sup> Women and Equalities Committee (February 2021) [Unequal impact? Coronavirus and the gendered economic impact: Fifth Report of Session 2019–21](#)

<sup>6</sup> See eg. UN Women (September 2020) [From insights to action: Gender equality in the wake of COVID-19](#)

<sup>7</sup> UN Department of Economic and Social Affairs (January 2021) [World Economic Situation and Prospects 2021](#)

<sup>8</sup> World Bank (2020) [Supporting Women Throughout the Coronavirus \(COVID-19\) Emergency Response and Economic Recovery](#)

<sup>9</sup> Response to Feminist Recovery Plan by Northern Ireland Departments, unpublished

Committee has outlined the interlinkages between CEDAW, as one of the core international human rights treaties, and the SDGs and emphasised their complementary nature.<sup>10</sup>

NIWEP would urge for all of the proposed Outcomes to be related directly to the Sustainable Development Goals (SDGs), and for the indicators under each Outcome to be drawn from the indicator set developed for the SDGs. This would ensure that the Programme for Government directly aligns with the SDGs, and would provide a systematic way to monitor progress against an internationally agreed set of indicators. This, in turn, would enable Northern Ireland to monitor progress systematically against other countries, which would help create new opportunities for collaboration internationally, while also benchmarking. It would also send a clear and strong message that it takes international obligations seriously, which can contribute to marketing Northern Ireland as a progressive region focused on investing in sustainable technologies, processes and practices. In a global context increasingly focused on green economies and sustainable development, this is not only important to meet the overall aim of the Outcomes Framework to strengthen wellbeing in Northern Ireland, but can also help attract international investment.

A core benefit of aligning the Outcomes Framework, and indeed the PfG, with the SDGs is that the SDGs explicitly recognise the interlinkage between individual Goals<sup>11</sup>; progress on one Goal directly supports progress on the others. For example, SDG5 focuses directly on gender equality, but gender equality is an essential requirement for achievement of other goals, notably SDG 1 No Poverty, SDG3 Health and Wellbeing, and SDG4 on education. Equally, action on each of these three SDGs is critical to strengthen gender equality. The proposed outcomes in the Outcomes Framework are clearly interlinked in a similar manner, and explicit recognition of these interlinkages would significantly strengthen the Framework, while creating a strong basis for cross cutting actions that can contribute to more than one Outcome at a time.

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#### **4. Comments on draft Outcomes**

##### **Our children and young people have the best start in life**

NIWEP welcomes inclusion of this as the first outcome. Ensuring that all children and young people have the best start in life, and can enjoy positive health and wellbeing physically, emotionally and socially is a core element of a modern society, and is also essential for sustainable future development.

The key, and glaring, omission under this outcome is reference to mental health and wellbeing. The draft Mental Health Strategy<sup>12</sup> currently open for consultation highlights the alarming levels of mental health issues among children and young people, and also sets out the gaps in service provision that must be addressed. NIWEP would urge for mental health and wellbeing among children and young people to be integrated into this outcome, and for reference to be made to the draft Mental Health Strategy. Specific focus should be put on increasing investment in CAMHS to a sustainable level (proposed to be 10% of the total budget in the Mental Health Strategy), and addressing service gaps as an urgent priority. This should, furthermore, be developed as a cross cutting action between the Department of Health, the Department of Education and the Department for Communities, to ensure children and young people are reached and prioritised across all the key settings in their lives.

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<sup>10</sup> CEDAW Committee (2019) [Guidance note for States parties for the preparation of periodic reports under article 18 of the Convention on the Elimination of All Forms of Discrimination against Women, in the context of the Sustainable Development Goals](#)

<sup>11</sup> See eg. UN (2019) [The Sustainable Development Goals Report 2018](#)

<sup>12</sup> Department of Health (December 2020) [Consultation on the Draft Mental Health Strategy 2021-2031](#)

NIWEP would also urge for this outcome to refer to gender equality in education, in particular ensuring that all young people have access to the full curriculum and have equal opportunities to pursue further and higher education in all its forms. Specifically, this would require a review of apprenticeships, and ensuring investment reflects needs in society, rather than traditional approaches that typically prioritise male dominated fields such as construction over areas such as health and social care, which as underlined through the COVID-19 crisis has been highlighted as a core service for all. NIWEP understands this is reflected within the Economic Recovery Plan recently published by the Department for the Economy<sup>13</sup>, which in addition puts specific emphasis on supporting women and girls into STEM subjects and careers.

Finally, NIWEP would strongly urge for this outcome to include development of a mandatory, comprehensive and age appropriate Relationship and Sexuality Education (RSE) curriculum, as set out in the report by the CEDAW Committee on the Inquiry into abortion legislation in Northern, taken under the Optional Protocol of CEDAW<sup>14</sup>. Comprehensive and inclusive RSE focuses on healthy relationships, which is a cornerstone for the healthy development of all children and young people. In addition to promoting health and wellbeing at individual level, RSE in this format can contribute to equality at societal level by promoting inclusion, mutual understanding and respect between people of all genders and backgrounds. This, in turn, is essential in order to address major issues such as the high levels of interpersonal and gender based violence in Northern Ireland.

### **We live and work sustainably – protecting the environment**

NIWEP believes this should be an overarching aim of the forthcoming PfG, along with the goal to improve health and wellbeing. The climate crisis is global and has profound economic and social impacts in addition to the environmental emergency, from affecting food security to reshaping global migration flows, which will shape Northern Ireland in ways that are difficult or indeed impossible to control locally. Therefore, international collaboration is critical to create a sustainable future for the planet as a whole. Meanwhile, investment in a sustainable future offers major opportunities to build a sustainable and resilient economy, while protecting the environment.

NIWEP welcomes reference to sustainable transport, a healthy built environment and sustainable housing. Good connectivity via public transport, along with safe, child and family friendly neighbourhoods and locally available services is particularly important for women and girls, who rely more than men on local services for everyday life. Connectivity, rather than mobility, is also an important focus for women and girls, as women typically trip chain journeys, including taking children to school or childcare and accessing local services, often linked into commuting to work. This requires access to lateral bus services, and not only 'hub and spoke' services connecting rural towns with Belfast or peripheral neighbourhoods with town and city centres. However, it should be noted that such healthy environments are supportive for all residents in Northern Ireland, providing choice and increasing equality for all.

It is also vital to take account of the likely long term changes to living and working patterns sped up by COVID-19; all available evidence indicates permanent increases in remote or home working, reducing the need to travel into former employment hubs such as Belfast city centre. Investment in local neighbourhoods, towns and villages is increasingly important, while the increase in people utilising local services offers major opportunities to regenerate towns and create new, sustainable jobs.

From a women's perspective, investment in care is also a core element of a green, sustainable economy and a society focused on wellbeing. An investment in care is essential above all to ensure the growing population of people in need of care can access the care and support they need to live

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<sup>13</sup> Department for the Economy (February 2021) [Economic recovery plan](#)

<sup>14</sup> CEDAW Committee (2018) [Inquiry into abortion legislation in Northern Ireland under Article 8 of the Optional Protocol to CEDAW](#)

with dignity and as independently as possible. It is also vital to reduce the burden of unpaid care, which falls disproportionately to women<sup>15</sup> and creates a situation where many women are unable to participate in the labour market, thus reducing their personal life opportunities as well as reducing revenue and economic potential. Investment in care – adult social care as well as childcare - enables women to participate in the labour force and generates revenue as disposable income rises, while reliance on benefits reduces. This is the core recommendation from the UK wide Commission on a Gender Equal Economy, which stresses that a caring economy is a response to structural inequality, as well as a means to realign the economy to support the overall aim of wellbeing in a sustainable way. Importantly, polling for the Commission highlights that over two thirds of respondents are willing to pay more tax to support well paid and secure jobs.<sup>16</sup>

A care economy will generate jobs, which are both green and sustainable jobs contributing to a resilient and sustainable economy<sup>17</sup>. A care economy has been highlighted as a vital element of a resilient and sustainable future economy in a range of recent reports, which demonstrate that investment in care can generate significant numbers of jobs; at UK level, it has been estimated that investment bringing the care workforce to 10% of the population could create up to 2.5 million jobs, for men as well as women. This report by Women’s Budget Group stresses that investing in care, rather than construction, would also allow for 50% more of investment to be recouped in direct and indirect tax revenue.<sup>18</sup> Meanwhile, a new report by the European Institute for Gender Equality (EIGE) shows how the persistent view of caring as ‘women’s work penalises all women in the workplace, and in particular women with children; the report indicates 60% of women in EU countries have experienced some change to employment conditions as a result of childcare needs and highlights how unpaid work and caring responsibilities drive the gender pay gap. The report emphasises that revaluing care is a basis for transforming policies on care and achieving greater investment in high quality, adequately paid professional care services.<sup>19</sup>

## **We have an equal and inclusive society where everyone is valued and treated with respect**

This is a critical pillar that NIWEP strongly supports. It would be important, however, that this section explicitly refers to gender equality, as well as equality for other groups with protected characteristics, as the S75 legislation has been put in place specifically to address well documented inequalities. It is also critical that this section recognises that inequalities arise primarily from gaps in implementation of legislation and policy, as well as practices stemming from cultural attitudes, and commits to action on addressing these gaps and attitudes.

NIWEP believes that the core issue for the PfG should lie in supporting implementation of legislation in order to achieve *de facto* equality in the realisation and enjoyment of human rights. From a gender perspective, current legislation complies with the broad aim to prohibit discrimination, ie. *de jure* equality. However, in practical terms, women and girls are unable to enjoy their human rights, as barriers to the realisation and enjoyment of human rights is not fully addressed through policy and practice. A core example is the right to be safe from violence, which is not fully realised in the absence of a strategy on violence against women and girls based on the recognition that gender based violence is a significant problem and the vast majority of victims of domestic abuse are

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<sup>15</sup> See eg. Women’s Budget Group (2020) [Spirals of Inequality: How unpaid care is at the heart of gender inequalities](#)

<sup>16</sup> See further information on the Commission for a Gender Equal Economy and the Commission report at [WBG Commission on a Gender-Equal Economy - Womens Budget Group](#)

<sup>17</sup> Cohen, M & McGregor, S (May 2020). [Towards a Feminist Green New Deal for the UK](#). London: Women’s Budget Group

<sup>18</sup> de Henau J & Himmelweit, S (June 2020) [A care led recovery from coronavirus](#). London: Women’s Budget Group

<sup>19</sup> EIGE (2021) [Gender inequalities in care and consequences for the labour market](#)

women and girls. Another example is the failure to put in place gender pay gap Regulations, which is required to realise the right to economic independence.

From a gender equality perspective, explicit inclusion of gender equality in the PfG would provide an opportunity to strengthen full and effective implementation. NIWEP believes that this can create the context within which strengthened gender competence training, gender sensitive policy analysis and effective implementation of existing protections can take place.

It would also be relevant to include a Bill of Rights among initiatives relevant to this outcome. NIWEP believes that a Bill of Rights forms an important part of developing a prosperous, equal and peaceful future Northern Ireland. A Bill of Rights provides a robust framework that clearly sets out a rights based approach to legislation and policy making, and thus provides certainty for all stakeholders, including residents of Northern Ireland who through a Bill of Rights can have confidence in a fair and equitable human rights approach. NIWEP believes that such an approach can create a basis for further development of a Northern Ireland consisting of diverse but cohesive communities, while also providing a mechanism for addressing current issues and barriers to effective realisation of human rights for everyone in Northern Ireland.

### **We all enjoy long, healthy active lives**

NIWEP welcomes the strong focus on health and wellbeing. As noted under Outcome 1, NIWEP believes that specific and explicit reference to the mental health and wellbeing of children and young people should be included, as a critical cross link ensuring that all children and young people can have the best start in life.

NIWEP would also welcome inclusion of the Gender Equality Strategy as a strategy relevant to this outcome. Health is a key area where men and women have separate and specific needs, and it is essential that this is recognised in the Programme for Government as well as in a Gender Equality Strategy. Specifically, women need comprehensive reproductive health services, and additional attention is required for conditions specific to female bodies, such as certain cancers and endometriosis. Maternal mental health is also a key, currently underserved area; this is recognised in the draft Mental Health Strategy that is proposing a number of actions relevant to address these. Men and boys experience inequalities particularly linked to mental health and wellbeing, and are overrepresented among those lost to suicide.

### **Everyone can reach their potential**

This is a critical outcome that is essential to achieving the overall outcome, and all the other outcomes identified. NIWEP welcomes the emphasis on decent work and a liveable wage, and would urge for this to be a core, cross cutting priority in future budgets as well as the PfG.

The outcome lacks an explicit focus on addressing poverty, and NIWEP would urge for this to be included as an explicit aim. It would also be helpful to highlight the socioeconomic drivers of poverty and disadvantage, as this would enable a comprehensive, cross cutting programme of action to be developed. It is also essential to understand the issues as systemic, as opposed to individual, and develop a whole systems approach that allows effective support systems to be developed.

Investment in education and childcare is an essential element to ensure everyone can reach their full potential, as set out in the Outcomes Framework for the PfG. and is critical both in itself as an investment in children and in the long term as an investment in a healthy, highly skilled Northern Ireland with low levels of poverty. NIWEP notes the findings of the new Ulster University report<sup>20</sup> on education in Northern Ireland, and would stress the importance of developing new funding models

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<sup>20</sup> Milliken, M (February 2021) [Administrative Structures in the NI Education System](#)

that focus on supporting achievement for all pupils, with strengthened support for those at risk of low attainment and those with special educational needs. This is critical to ensure equality for all children and young people, and support those from more disadvantaged backgrounds to fulfil their potential.

Childcare also enables parents, in particular mothers, to participate in the labour market, as outlined above in relating to investing in care. Enabling all parents to have a genuine choice regarding participation in the labour force is important for wellbeing at individual level, and for maximising access to the widest talent pool available. Maternal employment is also a key factor in reducing and preventing child poverty, while maternal education is directly linked to improved outcomes both in educational attainment and health<sup>21</sup>. The Childcare for All campaign coordinated by Employers for Childcare highlights core elements of a high quality childcare system, which should have universality and accessibility at its heart.<sup>22</sup>

Further education and professional training, in turn, will be critical to enable and support the growing cohort of unemployed people to build new skills and identify new job opportunities. This will be particularly important to respond to the structural changes the Northern Ireland economy is likely to experience as a result of the pandemic and EU exit, including a contraction of the retail and hospitality sectors, potential changes in the agri food and associated sectors and growth in knowledge and skills intensive sectors. Women and young people are overrepresented in the sectors hardest hit by the pandemic, and it is therefore critical that this is considered when designing and funding further education, including appropriate targeting and support for women and young people to engage with traditionally male dominated sectors.

With regard to pay, NIWEP believes that a liveable income for all workers is a basic element of a sustainable economy. This has also been highlighted by the Commission for a Gender Equal Economy as a cornerstone of a caring economy, and as noted above the proposal has public support, which has been evident in the context of the focus on care and essential workers during the ongoing pandemic. NIWEP is concerned that the lowest paid sectors, including adult social care work, are also heavily female dominated, which is a key factor in the gender pay gap, and would urge for a focus on a liveable income in all job creation initiatives. It is not sustainable that in work poverty is the most significant type of poverty, as this increases demand for benefits and public services in a context where employers gain the benefit and workers remain highly vulnerable.

NIWEP would emphasise that the living wage principle should be extended to cover posts funded through public sector grants. This should include all relevant costs, including legally mandated pension contributions.

### **Our economy is globally competitive, regionally balanced and carbon-neutral**

NIWEP would like to reiterate the points raised under Outcome 2, which set out the cornerstones of a sustainable economy as a whole. NIWEP would also like to stress that aligning the Outcomes Framework with the SDGs would contribute to ensuring this aim is achieved as an overall result of achieving the other outcomes.

The Feminist Recovery Plan<sup>23</sup> sets out core priorities for a sustainable economy from a women's perspective, and highlights in particular issues relevant for regional balance. Rural women are among the most marginalised groups in Northern Ireland, and as noted under Outcome 2, a connective, affordable public transport network is critical to enable rural women to effectively engage in both the economy and public life more widely. It is vital to utilise the opportunities emerging from COVID-19 and an increasingly flexible working culture to regenerate local villages

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<sup>21</sup> See eg. Harkness, S (2018) [Briefing on Female Employment and Child Inequality](#) for the [All Party Parliamentary Group on Social Science and Policy](#)

<sup>22</sup> For further detail, see [Childcare campaign | Childcare For All | Northern Ireland \(childcareforallni.com\)](#)

<sup>23</sup> Women's Policy Group (July 2020) [COVID-19 Feminist Recovery Plan](#)



and towns. Rather than highlighting concerns about the hospitality sector in Belfast, emphasis should be on how the move to more localised working can support job creation, innovation and investment across the region. This is critical to strengthen job opportunities for rural communities in general and rural women in particular, and in particular to ensure the younger generation will continue to view rural Northern Ireland as a viable place for their future.

### **Everyone feels safe – we all respect the law and each other**

NIWEP is concerned that there is no reference to domestic abuse and gender based violence under this outcome. Evidence by the PSNI shows that domestic incidents are increasing, and that women are the victim in 70 per cent of incidents<sup>24</sup>. Evidence from Women's Aid highlights that femicide in Northern Ireland is among the highest in Europe; a male intimate partner or relative is the suspect in five murders of women that have occurred in the last year alone<sup>25</sup>. Misogynistic violence and sexual harassment in public spaces and online is also rife, although dramatically underreported as women feel nothing will be done.

In terms of legislation, Northern Ireland lags behind the rest of the UK. Coercive control is not fully criminalised, despite the passage of the Domestic Abuse and Family Proceedings Act, and legislation on stalking and non fatal strangulation is not in place, unlike in England, Scotland and Wales<sup>26</sup>. Northern Ireland is also the only region in the UK without a specific strategy on ending violence against women and girls; the CEDAW Committee highlighted this as a major recommendation for action in the Concluding Observations of the 2019 examination of the UK, and noted protection of women in Northern Ireland lags behind those for women elsewhere in the UK<sup>27</sup>. In this context, it is particularly disappointing that recent statements by Ministers fail to recognise both the severity of the situation and the obligations under S75, in that the overall message is that such a strategy would indicate a lack of attention to violence against men.<sup>28</sup>

NIWEP would strongly urge for explicit reference to domestic abuse and gender based violence under this Outcome, and recognition that responsibility for action lies with all Departments. It should be noted that eliminating gender based violence is incorporated in SDG5, while the UK as a whole has obligations in this regard as a state party to CEDAW.

### **We have a caring society that supports people throughout their lives**

The comments under Outcomes 2 and 5 are relevant to this outcome as well.

### **People want to live, work and visit here**

The comments under Outcomes 2 and 5 are relevant to this outcome as well.

## **5. Comments on the EQIA**

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<sup>24</sup> Police Service of Northern Ireland (November 2020) [Trends in Domestic Abuse Incidents and Crimes Recorded by the Police in Northern Ireland 2004/05 to 2019/20](#)

<sup>25</sup> Women's Aid Federation Northern Ireland press release 9 March 2021 ['Women's Aid launch a petition for a Violence Against Women and Girls Strategy in NI'](#)

<sup>26</sup> [Women's Aid Federation Northern Ireland evidence to Justice Committee on Domestic Abuse and Family Proceedings Bill](#), presented 28 May 2020 to the Justice Committee of the Northern Ireland Assembly

<sup>27</sup> CEDAW Committee (2019) [Concluding Observations on the 8<sup>th</sup> periodic report of the United Kingdom](#)

<sup>28</sup> See eg. Assembly Question AQW 13950/17-22

## Alignment with the SDGs

NIWEP welcomes the EQIA on the draft Outcomes Framework, which is important considering the pivotal role of the PfG in shaping policies and services in Northern Ireland. NIWEP also welcomes the extensive work undertaken in preparing the EQIA, although NIWEP would have welcomed an opportunity to engage with the process at an earlier stage.

In line with comments made under Section 2 above, NIWEP particularly welcomes the alignment of the EQIA with the SDGs. This provides a very helpful framework for monitoring progress against an internationally agreed framework with a validated indicator set to underpin monitoring. The SDG indicators also provide a framework for strengthening data collection, in a way that enables more detailed breakdowns of data in respect of S75 groups. NIWEP is concerned that very limited gender disaggregated data is currently available to inform policy and decision making, and would urge for data collection enabling disaggregation to be a core priority within the PfG Outcomes Framework. This is vital in particular to understand the impact of policies, programmes and interventions, and enable effective targeting of resources. It is also essential to ensure the aim of the Outcomes Framework to empower everyone can be realised.

## Understanding gender equality

NIWEP is concerned that the EQIA has failed to take account of requirement to promote equality between women and men in S75, and does not fully utilise the statistics and evidence collected by NISRA. The EQIA highlights very limited evidence on gender equality, and does not develop a strong narrative of gender inequalities. As noted above, NIWEP would refer to the Feminist Recovery Plan<sup>29</sup> as the most up to date source of evidence of gender inequalities in Northern Ireland, and would urge for these themes to be reflected more strongly in the EQIA.

It is particularly concerning that the EQIA fails to consider impacts from the perspective of gender identity and sexual orientation. NIWEP accepts that limited statistical evidence is currently available, but this is not a reason to omit analysis; other forms of evidence including figures held by civil society organisations and narrative evidence could be used instead. As the EQIA is billed as a live document, NIWEP would urge for urgent further development of work in this area, in order to ensure that the Outcomes Framework and PfG can meet the aim of improving wellbeing for everyone. LGBTQI+ groups are among the most marginalised in our society and experience disadvantage and discrimination on a daily basis, and it is critical that the PfG integrates a full understanding of this to underpin effective interventions to strengthen equity for LGBTQI+ communities.

NIWEP is also concerned that the lack of focus on gender equality, gender identity and sexual orientation reflects a wider lack of understanding of the dynamics of inequalities. This is a specific omission that NIWEP believes requires urgent attention, in order to ensure the equality screening is in line with current equality legislation. It is also important to undertake more detailed analysis on intersectional characteristics overall; for example, an individual can be disabled, belong to a minority ethnic group and belong to a specific religious group, while also living rurally. Far from being single issue work, initiatives focused on gender equality are essential to achieve the Outcomes Framework as a whole, and it is essential that this is understood at the outset of work on the PfG. A response from Departments to the Feminist Recovery Plan, provided to the NI Assembly All Party Group on UNSCR 1325, Women, Peace and Security<sup>30</sup>, further highlights this by demonstrating both a lack of action focused on the disproportionate impact on women from COVID-19, and a limited understanding of action relevant to strengthening gender equality. The response, with contributions from all but one Government Department, demonstrates the very poor policy framework and practice in respect of securing gender equality. NIWEP would urge for further engagement with civil society to enable access to the comprehensive evidence base and data available within the sector.

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<sup>29</sup> Women's Policy Group (July 2020) [COVID-19 Feminist Recovery Plan](#)

<sup>30</sup> Response to Feminist Recovery Plan by Northern Ireland Departments, unpublished

## 6. Consultation

Finally, NIWEP would have welcomed an opportunity to engage with PfG process at an earlier stage, and for consultation for the full 12 weeks as recommended<sup>31</sup>. While the challenging circumstances are clear, it would have been possible to engage with stakeholders regarding strategic priorities and subpriorities at the level of principle, throughout the preparation process. This would have contributed additional, concrete evidence to support the draft Outcomes Framework, and would have highlighted both specific areas to target as well as interlinkages between issues, which can inform decision making by showing how action in one area can generate benefits in other areas, resulting in overall improved impact and potential savings. This, in turn, is essential for the lifetime of the Framework, as it will help ensure resources are targeted effectively.

NIWEP would urge for a review of the process for consultation, which can inform more comprehensive future approaches to consultation. Such a process is essential in order to ensure the widest and most robust evidence is available to decision makers preparing and agreeing the Outcomes Framework, which in turn will lead to a comprehensive, well targeted Programme for Government. It will also help ensure confidence in the process, as stakeholders will be able to see how the final position is arrived at. This in itself is likely to support engagement in good faith, based on an understanding that outcomes have been agreed in an inclusive manner, using a strong evidence base and transparent process.

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<sup>31</sup> OFMDFM (2003), A Practical Guide to Policy Making in Northern Ireland