

# Response to Ending Violence Against Women and Girls Strategic Framework and Foundational Action Plan

## 1. Introduction

The Commissioner for Children and Young People (NICCY) was established in accordance with 'The Commissioner for Children and Young People (Northern Ireland) Order' (2003) to safeguard and promote the rights and best interests of children and young people in Northern Ireland. Under Articles 7(2) and (3) of this legislation, NICCY has a mandate to keep under review the adequacy and effectiveness of law, practice and services relating to the rights and best interests of children and young people by relevant authorities. Under Article 7(4), NICCY has a statutory duty to advise any relevant authority on matters concerning the rights or best interests of children and young persons. The Commissioner's remit includes children and young people up to 18 years, or 21 years, if the young person has a disability or experience of being in the care of social services. In carrying out their functions, the Commissioner's paramount consideration is the rights of the child or young person, having particular regard to their wishes and feelings. In exercising their functions, the Commissioner is required to have regard to all relevant provisions of the United Nations Convention on the Rights of the Child (UNCRC).

NICCY welcomes the opportunity to respond to The Executive Office's (TEO) Ending Violence Against Women and Girls (EVAWG) Draft Strategic Framework and Foundational Action Plan. This submission is not intended to be comprehensive but instead addresses the aspects of this framework which most directly engages with children and young people's rights and best interests. It is also informed by the contributions of members of NICCY's Youth Panel. As one member stated this Framework is vital:

*"Because this is a long going problem that never seems to solve and many women and children die or end up severely injured due to the abuse or harassment, they endure left broken, traumatised, suicidal and numb."* (NICCY Youth Panel Member)

### 1.1. Children's Rights

The 54 Articles in the United Nations Convention on the Rights of the Child (UNCRC) outline the minimum standards for all children's rights to protection, participation and the provision of services. Children have a right to develop in a safe environment where their physical, emotional, educational, and social needs are respected and met, and that allow

children to thrive; this includes the right to be protected from all forms of violence, abuse, and neglect (Article 19, 34, and 35). While all children's rights will have relevance for those children who are the victims of, or witness to, violence, we have identified some of the key articles which are of particular significance; they include: the best interests of the child (Article 3), children's right to participation (Article 12) a child's right to information (Article 13), and children's right to recovery (Article 39).

Government has an obligation to ensure that appropriate measures and procedures, from preventative programmes to investigatory and judicial processes, are in place to realise these rights. The rights of the Convention are interdependent and indivisible – like children's lives they cannot be compartmentalised nor are they negotiable. We welcome the work The Executive Office has carried out in undertaking a thorough Child's Rights Impact Assessment (CRIA). We look forward to the publishing of the final version, along with a child-friendly version to promote transparency and open the decision-making process to external scrutiny as well as feeding back to the children and young people who were consulted as part of the process.

A CRIA should be an ongoing process that is subject to review, and updated as the law, policy or practice develops. A post-implementation monitoring, and review mechanism should be established.<sup>1</sup>

**Recommendation 1: TEO should publish the final version of the CRIA including a child-friendly version and establish a post-implementing monitoring and review mechanism.**

## **1.2 UNCRC – Concluding Observations**

The UN Committee on the Rights of the Child's Concluding Observations<sup>2</sup> following the examination of the UK State Party published in June 2023 referred to their concerns about:

*32 (a) The high prevalence of domestic abuse, sexual exploitation, gender-based violence and other forms of violence against children, including in alternative care, and insufficient measures to investigate such cases and bring perpetrators to justice;*

*(b) Insufficient measures to identify and support children at risk of violence at home;*

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<sup>1</sup> [Child Rights Impact Assessment \(CRIA\) - Niccy](#)

<sup>2</sup> [Concluding observations on the combined 6th and 7th periodic reports of the United Kingdom of Great Britain and Northern Ireland](#) : 32. P.10

*(c) Inadequate resources allocated to related services for child victims.*

The Committee specifically recommended the UK and devolved governments to:

*(d) Strengthen measures aimed at tackling violence against children, including by implementing the recommendations of the independent inquiry into child sexual abuse in England and Wales, the Gillen Review in Northern Ireland, the Scottish Child Abuse Inquiry and other relevant inquiries and investigations conducted by independent bodies;*

*(e) Develop measures aimed at preventing violence against children in alternative care, children with disabilities, asylum-seeking, refugee and migrant children and children belonging to minority groups;*

*(f) Ensure that all children who are victims or witnesses of violence have prompt access to child-sensitive, multisectoral and comprehensive interventions, services and support, including forensic interviews and psychological therapy, with the aim of preventing the secondary victimization of those children, and allocate sufficient resources for the implementation and expansion of the barnahus and similar models such as the Lighthouse in London.*

*(j) Strengthen the implementation of legislation protecting children from “abuse of trust” in all environments and extracurricular activities in Northern Ireland; <sup>3</sup>*

There was also specific reference to harmful practices such as child marriage, female genital mutilation and violence committed in the name of so-called honour, and the requirement to develop national strategies including implementing legislative and statutory protections to eliminate and prevent such harmful based practices impacting particularly on girls. <sup>4</sup>

**Recommendation 2: TEO should explicitly refer to the relevant recommendations by the UN Committee on the Rights of the Child in their Concluding Observations and ensure that this Framework works towards their full implementation.**

### **1.3. Safeguarding Children’s Rights in a Financially Constrained Context**

We acknowledge the difficult financial context facing departments and recognise that in times of crisis, children’s rights are often not prioritised. And yet, conversely, there is never

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<sup>3</sup> [Concluding observations on the combined 6th and 7th periodic reports of the United Kingdom of Great Britain and Northern Ireland](#) :33. P. 10

<sup>4</sup> [Concluding observations on the combined 6th and 7th periodic reports of the United Kingdom of Great Britain and Northern Ireland](#) :35 (a), p.11

a more important time to consider rights than during crises such as the one we are currently experiencing. Austerity-driven policy responses to reduced budgets can often exacerbate already widening inequalities and ingrained discriminatory practices. It is those on the edges who often carry the greatest costs in times of cutbacks. An issues paper published by the Council of Europe Commissioner for Human Rights, ‘*Safeguarding human rights in times of economic crisis*’ provides very useful guidance on the importance of respecting human rights in times of austerity.

*“In times of crisis, governments may not immediately view human rights as relevant to the urgent task of rescuing the economy from the brink of collapse. But as the Commissioner for Human Rights has argued, periods of financial dire straits should not be seen as emergency situations that automatically entail the curtailment of social and economic rights and the deterioration of the situation of vulnerable social groups. On the contrary, such periods of time should be viewed by states as windows of opportunity to overhaul their national human rights protection systems and reorganise their administration to build or reinforce the efficiency of national social security systems, including social safety nets that should be operational when necessary.”*<sup>5</sup>

Whilst human rights will not provide simple answers to the complex trade-offs that are currently taking place across departments, they do provide a framework and offer a series of red lines.

*“Human rights standards do not represent precise policy prescriptions. Economic policy in times of crisis requires a complex decision-making calculus, and governments enjoy a margin of discretion in choosing the means for safeguarding rights in times of economic constraint which best fit their circumstances. Nonetheless, human rights and equality do provide a universal normative framework and operational red lines within which governments’ economic and social policies must function.”*<sup>6</sup>

Critical to the debate over departmental savings is the principle of non-retrogression.

“Governments must avert retrogression in the realisation of economic, social and cultural

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<sup>5</sup> [1680908dfa \(coe.int\)](#) Safeguarding human rights in times of economic crisis: Issue Paper published by the Council of Europe Commissioner for Human Rights (2013) p.13

<sup>6</sup> [1680908dfa \(coe.int\)](#) Safeguarding human rights in times of economic crisis: Issue Paper published by the Council of Europe Commissioner for Human Rights (2013) p.8

rights, even in times of severe resource constraints such as economic recessions.”<sup>7</sup>

The UNCRC Committee’s Concluding Observations to the UK provided timely advice on taking account of children’s rights in budgetary processes and specifically focused on the Northern Ireland 2023-24 Budget. The Committee recommended:

*11. That the State party incorporate a child rights-based approach into the State budgeting process in all jurisdictions of the State party, the Overseas Territories and Crown Dependencies, and:*

*(a) Implement a tracking system for the allocation, use and monitoring of resources for children, with a view to eliminating disparities and ensuring equitability, and assess how investments in all sectors serve the best interests of children;*

*(b) Introduce budgetary allocations for children in disadvantaged situations and ensure that children are not affected by austerity measures;*

*(c) Ensure that, in situations of economic crisis, regressive measures are not taken without the requirements stated in paragraph 31 of general comment No. 19 on public budgeting for the realization of children’s rights, including that children participate in the decision-making process related to such measures;*

*(d) Withdraw the 2023/24 budget for Northern Ireland and fully consider the equality and human rights implications of a new budget, taking all possible steps to mitigate any adverse impact on children’s rights before issuing a revised budget;*

*(e) Ensure transparent and participatory budgeting in which civil society, the public and children can participate effectively.<sup>8</sup>*

We very much welcome the commitment in this Framework to a child’s rights-based approach and urge The Executive Office to ensure that sufficient resources are in place to safeguard the rights of children who have experienced gender-based violence, abuse and harm - particularly those children who are already most vulnerable and to ensure the

<sup>7</sup> [1680908dfa \(coe.int\)](https://www.coe.int/t/1680908dfa) Safeguarding human rights in times of economic crisis: Issue Paper published by the Council of Europe Commissioner for Human Rights (2013) p.31

<sup>8</sup> [Concluding observations on the combined 6th and 7th periodic reports of the United Kingdom of Great Britain and Northern Ireland :p.3](#)

successful implementation of this Framework. As the Framework states, wellbeing for all is at the heart of what Government aims to deliver in this jurisdiction and violence against women and girls in all its forms is a critical obstacle to achieving this goal of wellbeing for everyone. *“The ability to form and enjoy healthy relationships is central to individual wellbeing and vital to building better, more connected communities and a society where everyone can thrive.”* We therefore recommend that The Executive Office works with other departments in exploring the potential for building a Budget for Children’s Wellbeing that is rights based, preventative and participatory linked to The Children’s Services Co-operation (Northern Ireland) Act 2015 & The Children and Young People Strategy (2020-2030).

**Recommendation 3: TEO should ensure that sufficient resources are ringfenced to effectively implement this 7-year Framework and explore the potential of a Budget for Children’s Wellbeing.**

## **2. The Framework**

NICCY welcomes the investment in the inclusive co-design process which helped develop this framework and the work undertaken to encourage the participation of children and young people. We also welcome the architecture which has been built in ensuring the ongoing participation of children and young people in partnership with the Centre for Children’s Rights (Queen’s University Belfast) and look forward to engaging with this over the next few years.

Whilst we recognise and very much welcome that the engagement with children and young people has been informed by a ‘child’s rights-based approach’ we would like to see this recognised as one of the Strategic Framework Principles which form the outworking of this framework.

**Recommendation 4: TEO should report on the co-production process for this Strategy as a case study as evidence of good practice within government departments and wider sector.**

**Recommendation 5: TEO should add a rights-based approach as a Strategic Framework Principle.**

### **2.1 Vision**

We welcome the Framework’s vision which acknowledges the interconnected continuum between the different types of violence, abuse, and harm fed by systems of patriarchal

belief and structures.

Many of the responses from our Youth Panel talked about the pervasiveness and commonality of violence against women and girls and that “*it is not taken seriously enough.*” The Framework’s vision needs to communicate that as a society we are finally taking this issue seriously.

*“If society agrees and promotes the message that violence against women and girls must not be tolerated, and if police or teachers in school remind everyone to report if they have been subject to or witnessed women or children being abused, then people will be reassured and frequently reminded they are doing the right thing when reporting it.”*  
(NICCY Youth Panel Member)

Young people play a critical role in advising, strengthening and holding the NI Executive to account in implementing this vision. This needs supported and resourced for the long term.

*“I would spread the message with women and children who have suffered this, and we would tell their stories. I would then go into secondary schools and spread the word as well as other places. I would then discuss with local nightclubs on the topic and for there to be more surveillance and finally I would arrange a service where women and children can ring and tell us what they have endured then the police would handle the matter and the victim of it would get the right treatment.”* (NICCY Youth Panel Member)

**Recommendation 6: The Foundational Action Plan should include an indication of the budget allocated to support the children and young people’s engagement architecture and TEO should ensure that sufficient resources are ringfenced each year over the next seven years.**

We will now comment under the four overall themes of the Framework.

## **2.2 Prevention**

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

Our Youth Panel respondents strongly supported the focus on education in schools and colleges including linking in to meaningful, age-appropriate, comprehensive and



scientifically accurate sexual and reproductive health education and the importance of teacher training on such issues as misogyny, sexual abuse, domestic violence abuse and consent.

*“I would get it taught in schools. In all my years at school this subject has only been briefly spoken about. Any lesson it was mentioned was not something I remember well.”* (NICCY Youth Panel Member)

NICCY has consistently highlighted the need for access to Relationships and Sexuality (RSE) within schools, and expressed concerns that the current approach, which enables grant-aided schools to develop their own policy on how they will address RSE within the curriculum, is contrary to the UN Committee’s recommendation that meaningful sexual and reproductive health education is part of the mandatory school curriculum for all schools in Northern Ireland.

Our Youth Panel members also spoke to the need for bystander training as an important life skill alongside, for example, first aid. This would help young people understand early signs of violence, with peer-to-peer mentoring programmes and peer interventions and could be included as part of all youth leadership training programmes.

*“Men and boys have a very important role to play. They must stand strong against this type of violence. They should call out men who make light of or dismiss violence and against women. It is important that boys are taught and encouraged from a young age to respect women so that they themselves grow up into adults who are not violent against women and children and will not tolerate it in society.”* (NICCY Youth Panel Member)

Article 13 in the UNCRC applies to both girls and boys: for boys, the right to information and learning with regards not to hurt girls and women. And for girls the right to be given the space to understand that ‘this shouldn’t just happen.’ It is a failure by duty holders that young people have to rely on an ‘unofficial curriculum of learning’ such as social media rather than being provided with the information and learning that they have the right to receive.

The Gillen Review (2019)<sup>9</sup> spoke to the prevalence of myths around sexual and domestic

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<sup>9</sup> [Gillen Review Report into the law and procedures in serious sexual offences in NI | Department of Justice \(justice-ni.gov.uk\)](https://www.justice-ni.gov.uk/gillen-review-report-into-the-law-and-procedures-in-serious-sexual-offences-in-ni)



violence that inform the sub-culture and stories that shape behaviours and decisions at all levels of society. Strongly and consistently addressing these myths through public information campaigns, political and civic leadership, education is an essential part of prevention.

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

NICCY welcomes the mandatory requirement for the inclusion of age appropriate, comprehensive and scientifically accurate education on sexual and reproductive health and rights, covering prevention of early pregnancy and access to abortion, in the Northern Ireland curriculum for adolescents. RSE plays a vital role in protecting children and young people from abuse, exploitation and sexual violence. Educating children about equality and respect in relationships places them in a stronger position to recognise abusive individuals and situations. Involving them in the co-design ensures relevance.

We would also support NSPCC's call for a focus on the prevention and early intervention of harmful sexual behaviour (HSB). This should include a commitment to working with the Department of Education and the Education Authority to develop guidance and resources for all schools on how to monitor and respond to incidences of harmful sexual behaviours within a welfare and safeguarding framework. <sup>10</sup> Specific support is required for special schools with evidence that there is a lack of tailored resources in relation to sexual development and HSB for young people with a disability, such as on preventative work in RSE education, awareness-raising with students and their parents and carers, and identification of, and response to, HSB occurring between their students. <sup>11</sup>

We would also draw attention to the need to ensure the role of boys and men in relation to girls' and women's rights to protection is accounted for in the Framework, whether through boy's access to education about healthy relationships, in their roles as peers, care givers and professionals or in ensuring speedy access to effective and robust interventions to address harmful or criminal behaviours.

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<sup>10</sup> Briefing: Strategic Framework to End Violence Against Women and Girls (EVAWG) and Foundational Action Plan, NSPCC Northern Ireland, September 2023

<sup>11</sup> Lloyd, Walker, J, Bradbury, V Beyond Referrals Harmful Sexual Behaviour in Schools: a briefing on the findings, implications and resources for schools and multi-agency partners

*“Men and boys need to be more educated on this topic, so many women face such horrible things and people say they were asking for it. Instead of changing how girls dress or act, we should educate the boys.” (NICCY Youth Panel Member)*

*“Going to an all-boys school, I think education and understanding is needed as our only outlet to understanding women and relationships are from the media, a lot of which can be harmful. Toxic masculinity and sexism is quite at large and this can often be seen as the “way it should be”, as I think most boys don’t understand feminism and see female rights as an attack on their own.” (NICCY Youth Panel Member)*

*“Men and boys are mainly the problem, and we need to stop seeing girls as property, often boys and men can be disrespectful about women and thinking its humorous. This attitude is what develops to men thinking it’s ok to be violent to a woman. Men also see how historically men have more power in the patriarchy and so think ‘it was ok then so why not now’. Often seeing feminism as a threat to their masculinity. If a man in a group makes a ‘fly away’ sexist comment, it only takes one other man in the group to stand up to him and I would say the other men who are there would more or less agree but were previously laughing as they have a herd like mentality so as not to loose face. Although women would agree that the one man who stood up was more manly than the rest. I think if more men understood and were educated on the topic, the domino effect would generationally stop violence against women (or at least greatly reduce it)” (NICCY Youth Panel)*

***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.***

Some of our Youth Panel respondents referred to the importance of parents being supported to understand the dynamics of violence and how to effectively support their children. NICCY welcomes the PSNI’s Operation Encompass initiative which recognizes that a child’s experience of domestic abuse is different to that of an adult.

NICCY has consistently called for legislative reform to ensure children have equal protection from all forms of assault, including physical punishment, and government-led actions to support families, including through dedicated and effective positive parenting

support.<sup>12</sup> Whilst not specifically gendered in nature, a wide body of research shows that physical punishment of children is harmful with long lasting impacts on future behaviour and mental health.<sup>13</sup> The effect of adverse childhood experiences (ACEs) on children who see violence in the home from an early age and normalise this as appropriate and acceptable behaviour needs to be considered.

*“Women and children can be vulnerable. Children should be allowed to grow up in a safe environment where they can grow into adults who are not scared by their experiences. Violence breeds violence.”* (NICCY Youth Panel Member)

Our Youth Panel respondents indicated the importance of tougher measures against social media sites that do not prevent and remove abusive and threatening posts. Whilst *“inputting to UK wide legislation to deal with degrading or abusive material online”* is mentioned as an action we support the NSPCC’s recommendation that the Framework should include a commitment to scoping the criminal law in Northern Ireland as it relates to online safety to explore whether we require additional legislation to keep children and young people safe online.<sup>14</sup>

The recently published Growing Up Online Children’s online activities, harm and safety in Northern Ireland - an Evidence Report<sup>15</sup> highlights that girls are much more likely to experience something nasty or unpleasant online, both among the younger cohort (23% girls vs 17% boys) and the older cohort (20% girls vs 15% boys) and refers to the *“underexploited opportunity offered by Relationships and Sexuality Education (RSE) in the Northern Ireland Curriculum which has the potential to address these sensitive issues. It is recommended that content relating to healthy online relationships should become mandatory, not least given the growing prevalence (as evidenced in this report) of toxic masculinity and online pornography, and the negative impact this is having on boys’ attitudes, language and behaviour towards girls.”*<sup>16</sup>

NICCY also recommends that this Framework and Action Plan is informed by OFCOM’s work in preparing for an Online Safety Regime upon the enactment of the Online Safety

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<sup>12</sup> [NICCY-SOCRNI-3-Main-Report-2022-final-web.pdf](#) p.122

<sup>13</sup> [Physical punishment and child outcomes in the UK - Nuffield Foundation](#)

<sup>14</sup> Briefing: Strategic Framework to End Violence Against Women and Girls (EVAWG) and Foundational Action Plan, NSPCC Northern Ireland, September 2023

<sup>15</sup> [Growing-Up-Online-Executive-Summary-Report.pdf \(stran.ac.uk\)](#)

<sup>16</sup> [Growing-Up-Online-Executive-Summary-Report.pdf \(stran.ac.uk\)](#) p.5

Bill. We wish to emphasise the importance of taking a child rights approach in ensuring all online service providers meet their responsibility in respecting the rights of the child in the digital environment and that they are encouraged to support and promote these rights as recommended by the European Network of Ombudspersons for Children (ENOC) Position Statement on “Children’s Rights in the Digital Environment” in 2019. <sup>17</sup>

*“Social media is brainwashing children of all ages. It depicts a certain view of women which in turn make boys feel superior to women.”* (NICCY Youth Panel Member)

Previous work by NICCY and our Youth Panel has also focused on child marriages with the young people expressing concern that children up to age of 18 should be afforded full protection in this area. The UN Committee on the Rights of the Child Concluding Observations recommended to the State Party to:

*“Prohibit all marriages under 18 years of age, without exception, in Scotland, Northern Ireland and all Overseas Territories and the Crown Dependencies of Guernsey and the Isle of Man.”* <sup>18</sup>

They also spoke to the impact of domestic violence on children and the need to better understand and support those young people:

*“This is happening far too often and lots of kids are going into the care system for domestic violence reasons.”* (NICCY Youth Panel Member)

NICCY has previously called for the strengthening systematic data collection and recording of information on violence against children, including domestic violence, gender-based violence, abuse and neglect, in all settings, as well as information sharing and referral of cases among relevant sectors. <sup>19</sup>

Finally, our Youth Panel respondents also referred to the importance of staff including security staff working in nightclubs, festivals, concerts, bars and pubs being skilled in recognizing and effectively responding to gender-based violence and the vulnerability of girls and women in those spaces.

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<sup>17</sup> [ENOC-2019-Statement-on-Childrens-Rights-in-the-Digital-Environment-FV.pdf](#)

<sup>18</sup> [Concluding observations on the combined 6th and 7th periodic reports of the United Kingdom of Great Britain and Northern Ireland](#) : 18 (b) p.5

<sup>19</sup> [NICCY-SOCRNI-3-Main-Report-2022-final-web.pdf](#) p.68

**Recommendation 7: The NI Executive should bring in legislative reform to ensure children have equal protection from all forms of assault, including physical punishment, and government-led actions to support families, including through dedicated and effective positive parenting support. <sup>20</sup>**

**Recommendation 8: TEO should commit to working with the Department of Education, the Education Authority and the Council for the Curriculum, Examinations & Assessment as part of the RSE progression framework to develop guidance and resources for all schools on how to understand, monitor and respond to incidences of harmful sexual behaviours and gender-based violence within a welfare, safeguarding and child protection framework.**

**Recommendation 9: TEO to ensure that the relevant recommendations in the ‘Growing Up Online Children’s online activities, harm and safety in Northern Ireland - an Evidence Report’ are included in the Framework and Action Plan.**

**Recommendation 10: TEO to take cognizance of OFCOM’s work in preparing for an online Safety Regime as well as scoping out the value of legislative changes in Northern Ireland to strengthen the safety of young people online.**

**Recommendation 11: TEO to prioritise investment in the training of the nighttime economy staff including security staff to safeguard young people.**

**Recommendation 12: The government to bring forward legislation ensuring that children under the age of 18 are not subject to any form of child marriage or civil partnership in Northern Ireland**

**Recommendation 13: To strengthen systematic data collection and recording of information on violence against children, including domestic violence, gender-based violence, abuse and neglect, in all settings, as well as information sharing and referral of cases among relevant sectors.**

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<sup>20</sup> [Equal Protection - update - Niccy](#)

## 2.2. Protection and Provision

### ***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.***

The recently published research reports by the Centre for Children’s Rights on the experiences of violence by girls and women <sup>21</sup> reported that for many girls their first port of call in terms of talking about an experience of violence is often the ‘informal’ community or youth space.

*“If I had the power, I would ensure they had a safe environment to come to and talk about it as there aren’t very many places like that.”* (NICCY Youth Panel Member)

Long term investment in a community, voluntary and youth support infrastructure is a key piece in achieving the outcomes of this Framework providing early intervention and delivering a coherent and sustainable trauma informed response. These are not ‘discretionary’ services at the front line of cuts but essential in meeting children and young people’s rights.

In relation to the provision of services, we wish to highlight CEDAW’s 2019 recommendation that, in regard to violence and abuse, approaches to commissioning services should not undermine girls and women being able to access specialist services, and that the needs of more vulnerable groups, such as, those with disabilities, the Traveller Community, those with No Recourse to Public Funds and LGBTQIA+ community are addressed.<sup>22</sup>

*“Violence, especially against vulnerable people, is wrong and never acceptable. We must do everything we can as a global community to put an end to this type of violence, so women and children do not have to live in fear and suffer.”* (NICCY Youth Panel Member)

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<sup>21</sup> [It's just what happens': girls' and young women's views and experiences of violence in Northern Ireland — Queen's University Belfast \(qub.ac.uk\)](https://www.qub.ac.uk/research/research-projects/its-just-what-happens-girls-and-young-women-s-views-and-experiences-of-violence-in-northern-ireland/)

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[https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8&Lang=En](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8&Lang=En)

**Recommendation 14: Long term and coherent funding of the community, voluntary and youth support infrastructure ensuring comprehensive and sustained support service to all children and young people with a particular focus on those who are most vulnerable to violence and abuse.**

### **2.3 The Justice System**

***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.***

We welcome the commitment to establishing an early Task Group Sprint focusing on victims and survivors with no recourse to public funds subject to immigration control. This is likely to increase as a priority in the context of the Illegal Migration Act potentially increasing the risk of sexual exploitation and modern slavery, 70% of which are female. Female migrants will be left with even fewer options to escape gender-based violence. This needs to be broadened to ensure that a gender lens is adopted in the development of all new legislation, policies and services.

More effective police and justice responses was a measure that was regarded as key priority by our Youth Panel respondents as well as the young people participating in the Centre for Children's Rights recent research, "It's Just What Happens."

*"Some young women offered advice on how reporting sexual violence might be made easier. Being believed, not being expected to provide evidence, less intrusive and accusatory questioning, not having to tell their story multiple times, and empathy, were among their recommendations. Unless cultures of blame and criminal justice processes changed however, it was felt that the barriers to reporting would remain as young women ultimately 'know they're [boys and men] gonna get off with it'."*<sup>23</sup>

We have been calling for many years, with others, for a Barnahus model in Northern

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<sup>23</sup> [It's just what happens': girls' and young women's views and experiences of violence in Northern Ireland — Queen's University Belfast \(qub.ac.uk\)](https://www.qub.ac.uk/research/it-s-just-what-happens-girls-and-young-women-s-views-and-experiences-of-violence-in-northern-ireland)



Ireland. This would ensure a child-centred response to victims of child sexual violence and abuse by providing child protection and medical, therapeutic and criminal justice processes all under one roof where support to children is provided both at the immediate point of disclosure or reporting and over the longer term.

As Lord Gillen commented in his review of the criminal justice system, our justice system is currently designed for professionals, not children.

*“The Barnahus Model is not just a programme of work; it is an invitation for a fundamental cultural change in our attitudes to children within the criminal justice system. We must create a model of criminal justice which not only ensures the voice of the child is heard but which recognises and comprehends the vulnerability of child victims and the potential permanent harm which the present system may carry within.”<sup>24</sup>*

If 57% of victims of sexual violence are children and young people, then our justice system needs to respond and reflect the needs of these right holders. In 2021/22 the average number of days for a case involving a child from reporting to being dealt with at the Crown Court was 876 days. We recommend that an early Task Group sprint be established to urgently address the delay in child sexual abuse cases.

**Recommendation 15: To ensure that this Framework and Action Plan can positively contribute to establishing a Barnahus model in Northern Ireland.**

**Recommendation 16: To establish an early Task Group sprint to urgently address the delay in child sexual abuse cases.**

## **2.4 Working Better Together**

***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.***

We welcome the priority given to developing robust evidence based and data informed policy development with measurable benefits/outcomes which includes the voices of those who have or are experiencing gender-based violence.

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<sup>24</sup> [Gillen Review Report into the law and procedures in serious sexual offences in NI | Department of Justice \(justice-ni.gov.uk\)](https://www.justice-ni.gov.uk/gillen-review-report-into-the-law-and-procedures-in-serious-sexual-offences-in-ni)

Our Youth Panel respondents consistently spoke to the need for organisations and politicians to be working together and offering strong political and civic leadership on this issue. The Children's Services Co-operation (Northern Ireland) Act 2015 & Children and Young People's Strategy (2020-2030) are important policy and legislative facilitators to achieving this outcome. It is also vital that, when an Executive is re-established, there is a strong Children's minister to lead the Executive in working together to deliver for children.

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**Recommendation 17: This Framework needs ensure that a strong Children's Minister, the Children's Services Co-operation Act and the Children and Young People's Strategy are seen as vital pieces in achieving Outcome 6.**

## **2.5 EQIA**

NICCY welcomes the comprehensive EQIA undertaken by TEO. We recommend including some other data sets including any relevant safeguarding data in relation to young people in contingency accommodation, data from the PSNI Operation Encompass Programme, sexual assaults in schools and wider prevalence data with regards harmful sexual behaviour.

## **2.6 Rural Needs Impact Assessment**

NICCY welcomes the commitment to establish an early task group sprint research looking at the needs of rural women and girls to identify issues of particular concern to people in rural areas linked to the remit of the draft Strategic Framework. We note some of the issues highlighted in this impact assessment including:

- Rural victims are half as likely to report their abuse to others.
- Rural victims' abuse goes on significantly longer.
- Rural victims cannot readily access support services.
- Rural victims live in a society that defacto protects the perpetrators.
- Rural victims are isolated, unsupported and unprotected.

## **3. Concluding Remarks and summary of recommendations**

We very much welcome TEO's commitment to investing in the genuine participation of

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<sup>25</sup> The role of Children's Minister moved with the Children and Young People's Unit to the Minister for Education and DE from OFMDFM following the restructuring of government departments as part of the Review of Public Administration in 2016.

children and young people in the development and implementation of this Framework and subsequent action plans. This will not only lead to better decision making & outcomes but can also contribute to healing and recovery. The converse is also true; poor participation can lead to re-traumatisation. Genuine participation takes time, money and is a long-term process and NICCY welcomes the opportunity to work with TEO and others to ensure that young people's voices and experiences are given space, are listened to and are acted upon, as appropriate to ensure that this Framework's vision is realised in the daily lives of all girls and women.

*“As woman and children deserve to be able to go about their normal life's without having to worry about violence and aggression. Especially in the home, families, communities and workplaces. We need to make it normal to call out and report and we need to plan to end it as children growing up in this surrounding will think this is normal and the loop of violence will continue.”* (NICCY Youth Panel Member)

### **Summary of Recommendations**

**Recommendation 1:** TEO should publish the final version of the CRIA including a child-friendly version and establish a post-implementing monitoring and review mechanism.

**Recommendation 2:** TEO should explicitly refer to the relevant recommendations by the UN Committee on the Rights of the Child in their Concluding Observations and ensure that this Framework works towards their full implementation.

**Recommendation 3:** TEO should ensure that sufficient resources are ringfenced to effectively implement this 7-year Framework and explore the potential of a Budget for Children's Wellbeing.

**Recommendation 4:** TEO should report on the co-production process for this Strategy as a case study as evidence of good practice within government departments and wider sector.

**Recommendation 5:** TEO should add a rights-based approach as a Strategic Framework Principle.

**Recommendation 6: The Foundational Action Plan should include an indication of the budget allocated to support the children and young people’s engagement architecture and TEO should ensure that sufficient resources are ringfenced each year over the next seven years.**

**Recommendation 7: The NI Executive should bring in legislative reform to ensure children have equal protection from all forms of assault, including physical punishment, and government-led actions to support families, including through dedicated and effective positive parenting support. 26**

**Recommendation 8: TEO should commit to working with the Department of Education, the Education Authority and the Council for the Curriculum, Examinations & Assessment as part of the RSE progression framework to develop guidance and resources for all schools on how to understand, monitor and respond to incidences of harmful sexual behaviours and gender-based violence within a welfare, safeguarding and child protection framework.**

**Recommendation 9: TEO to ensure that the relevant recommendations in the ‘Growing Up Online Children’s online activities, harm and safety in Northern Ireland - an Evidence Report’ are included in the Framework and Action Plan.**

**Recommendation 10: TEO to take cognizance of OFCOM’s work in preparing for an online Safety Regime as well as scoping out the value of legislative changes in Northern Ireland to strengthen the safety of young people online.**

**Recommendation 11: TEO to prioritise investment in the training of the nighttime economy staff including security staff to safeguard young people.**

**Recommendation 12: The government to bring forward legislation ensuring that children under the age of 18 are not subject to any form of child marriage or civil partnership in Northern Ireland**

**Recommendation 13: To strengthen systematic data collection and recording of information on violence against children, including domestic violence, gender-based violence, abuse and neglect, in all settings, as well as information sharing**

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26 [Equal Protection - update - Niccy](#)

and referral of cases among relevant sectors.

**Recommendation 14: Long term and coherent funding of the community, voluntary and youth support infrastructure ensuring comprehensive and sustained support service to all children and young people with a particular focus on those who are most vulnerable to violence and abuse.**

**Recommendation 15: To ensure that this Framework and Action Plan can positively contribute to establishing a Barnahus model in Northern Ireland.**

**Recommendation 16: To establish an early Task Group sprint to urgently address the delay in child sexual abuse cases.**

**Recommendation 17: This Framework needs ensure that a strong Children's Minister, the Children's Services Co-operation Act and the Children and Young People's Strategy are seen as vital pieces in achieving Outcome 6.**