



CONVENTION ON THE ELIMINATION OF ALL FORMS OF DISCRIMINATION AGAINST WOMEN

FOLLOW-UP TO THE CONCLUDING OBSERVATIONS FROM THE FOUR NATIONS OF THE UNITED KINGDOM

September 2021

1. INTRODUCTION

Since the 2019 examination of the UK the global Covid-19 pandemic has upended women's lives. Austerity measures had already decimated the public services women rely on; cuts to social security have increased poverty and homelessness, while insecurity has exacerbated mental health issues and further undermined women's access to secure employment while increasing unpaid care. This has entrenched inequalities that systematically breach women's rights and left public services unprepared for the response required to prevent catastrophic impacts of the pandemic.

Women's precarity and exclusion has been dramatically exacerbated amid the ongoing uncertainty of the UK's exit from the European Union ('Brexit') and future global relationships. Women's equality has not been prioritised within management of these events, which have consumed political action and discourse.

1.1 About the writing of this report

This submission follows a four-nations shadow report produced for the UK examination in February 2019,¹ and draws on evidence submitted by civil society organisations to Engender, Northern Ireland Women's European Platform,

¹ Engender, NIWEP, WEN Wales, NAWO, 'CEDAW Shadow Report From The Four Nations Of The United Kingdom', 2019, <https://www.engender.org.uk/content/publications/CEDAW-4-nations-report-Jan-2019.pdf>.

Women's Equality Network Wales and the Women's Resource Centre in England. This interim shadow report focuses on the areas of concern indicated by the Committee (at paragraphs 13, 21 and 25). However, lack of action across issues mean women's lives are likely to have worsened. We have therefore highlighted the impact of COVID-19 and violence against women to assist the Committee evaluate progress reported by the UK Government. **We must stress that the UK government did not engage with any of the contributing organisations in preparation of its report.**

1.2 Devolution

The UK Parliament and Government have legislative and policy competence across the four UK nations (England, Northern Ireland, Scotland and Wales) to differing degrees. England is exclusively governed by the UK Government and Westminster Parliament; Treasury also allocates the majority of total budgets for the devolved nations. Northern Ireland, Scotland and Wales each have their own parliaments with responsibilities for devolved policies, which cover most matters except defence, foreign policy, and equality and human rights. However, competencies are asymmetric. Scotland and Northern Ireland also have their own distinct legal systems.

The Equality and Human Rights Commission (EHRC) is the national equality body for Great Britain (England, Scotland and Wales) while Equality Commission for Northern Ireland and the Human Rights Commission for Northern Ireland share responsibilities in Northern Ireland. The Equality Act 2010 is the primary source of equality and non-discrimination protection for women in Great Britain and the key lever for gender mainstreaming in policymaking. Regulations to deliver mainstreaming differ across England, Scotland and Wales. Northern Ireland has separate equality legislation and a more limited mainstreaming duty, through S75 of the Northern Ireland Act 1998.

1.3 Intersectionality

While this report is not a thorough intersectional analysis, we recognise the ways in which women experience multiple discrimination because of intersecting identities. Recent social movements like Black Lives Matter have highlighted the ongoing discrimination against Black people that continues to affect the opportunities and outcomes for Black and racialised women in the UK. The subsequent denial of

institutional racism in the Sewell report² earlier this year is extremely worrying, and a missed opportunity to tackle the disproportionate impact of systemic racism.³ We will raise some of these issues and comment on other examples of multiple and intersecting discrimination throughout this report.

2. INCORPORATION OF CEDAW INTO DOMESTIC LAW (PARAGRAPH 13)

2.1 Incorporation proposals

At the recent Scottish Parliament election a majority of the parties elected indicated support for incorporation. A National Taskforce on Leadership in Human Rights recommended a new single framework incorporating national human rights standards – including CEDAW - within the constitutional arrangements.⁴ The previous Welsh Government convened a Strengthening Human Rights Steering Group and has committed to incorporation,⁵ where competence allows. The UK Government, however, has expressed no interest in incorporation.⁶ This not only fails to understand the nature and process towards achieving ‘substantive equality’ as required by CEDAW, it also fails to offer women and girls in England the prospect of domestic accountability and limits the scope of protection that may be available to women in Scotland and Wales in reserved policy areas too.

In Northern Ireland, CEDAW is absent from public debate. Civil society is urging incorporation through a Bill of Rights for Northern Ireland.⁷

2.2 Domestic Equality Protections

The Equality Act and Human Rights Act are not sufficiently focused on gender to ensure CEDAW’s vision of substantive equality. Women’s organisations have

² UK Government, ‘The Report of the Commission on Race and Ethnic Disparities’, 2021, <https://www.gov.uk/government/publications/the-report-of-the-commission-on-race-and-ethnic-disparities/k/government/publications/the-report-of-the-commission-on-race-and-ethnic-disparities>

³ See eg. Sisters of Frida (2020) Sisters of Frida, ‘Disabled Women’s Perspectives on Independent Living during the Pandemic’, 21 May 2021, <https://www.sisofrida.org/report-disabled-womens-perspectives-on-independent-living-during-the-pandemic/final-disabled-womens-perspectives-on-independent-living-during-the-pandemic-with-image-descriptions/>.

⁴ National Taskforce for Human Rights Leadership, ‘National Taskforce for Human Rights Leadership Report’, 2021, <https://www.gov.scot/binaries/content/documents/govscot/publications/independent-report/2021/03/national-taskforce-human-rights-leadership-report/documents/national-taskforce-human-rights-leadership-report/national-taskforce-human-rights-leadership-report/govscot%3Adocument/national-taskforce-human-rights-leadership-report.pdf>.

⁵ Welsh Government, ‘Strengthening and Advancing Equality and Human Rights Steering Group’, GOV.WALES, accessed 16 September 2021, <https://gov.wales/strengthening-and-advancing-equality-and-human-rights-steering-group-0>.

⁶ Access a letter from the Minister for Women and Equalities here: <https://www.equalityhumanrights.com/en/our-human-rights-work/monitoring-and-promoting-un-treaties/convention-elimination-discrimination>. The letter states that CEDAW’s content is “already largely reflected in existing domestic legislation” and that incorporation of CEDAW would “risk creating a hierarchy of rights.”

⁷ See Northern Ireland Assembly, [Ad hoc Committee on a Bill of Rights for Northern Ireland](#); submissions by the women’s sector are available through this site.

reported a trend towards increasingly ‘gender neutral’ policymaking,⁸ particularly evident in Northern Ireland.⁹ Policies such as the hostile environment¹⁰ and austerity have had egregious impacts for women’s social and economic rights across the UK.¹¹

2.3 Data

Compliance with CEDAW is undermined by a lack of gender-sensitive sex-disaggregated data. UK institutions routinely gather data at household level or fail to gather data necessary for gender mainstreaming, undermining compliance with CEDAW and domestic equality laws.¹²

RECOMMENDATION:

The Scottish and Welsh Governments should establish processes to engage with women and women’s organisations in developing incorporation legislation and policy.

RECOMMENDATION:

Government at UK and devolved levels should conduct a review of the effectiveness of gender mainstreaming, and invest in strengthened data collection.

3. ASSESSING THE IMPACT OF BREXIT ON WOMEN’S HUMAN RIGHTS AND ADOPTING MITIGATING MEASURES (PARAGRAPHS 21 (A) AND (B))

3.1 Impact Assessment

⁸ See also 2014 UN Special Rapporteur’s report on violence against women in the UK concluded that policies and practices on violence against women are increasingly gender neutral and aim for equal treatment for all, thereby disregarding the need for special measures that acknowledge difference and recognise that women are disproportionately impacted by violence, inequality and discrimination. The report also highlights that the shift from gender specificity to gender neutrality has occurred to the detriment of gender-specific initiatives and programmes. Rashida Manjoo, ‘Report of the Special Rapporteur on Violence against Women, Its Causes and Consequences, - Addendum’, 2015, https://ap.ohchr.org/documents/dpage_e.aspx?si=A/HRC/29/27/Add.2.

⁹ UK Government, ‘New Decade, New Approach’, 2020, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf.

¹⁰ The Equality and Human Rights Commission (EHRC) published a report in November that strongly criticised the government’s lack of adherence to the Public Sector Equality Duty (PSED) in their ‘hostile environment’ policies. Equality and Human Rights Commission, ‘Public Sector Equality Duty Assessment of Hostile Environment Policies’, 2020, <https://www.equalityhumanrights.com/sites/default/files/public-sector-equality-duty-assessment-of-hostile-environment-policies.pdf>.

¹¹ Ibid.

¹² The Scottish Government published a Gender Equality Index in December 2020. The Index sets a baseline score for women’s equality, but this also masks deeper inequality experienced by difference groups of women and relies on selective and limited data already gathered and sex-disaggregated. Scottish Government, ‘Scotland’s Gender Equality Index 2020’, accessed 17 September 2021, <https://data.gov.scot/genderindex/gender-equality-index-2020.html>.

The Withdrawal Agreement between the UK and EU includes no reference to women or gender¹³ and there is no evidence that the UK Government has undertaken a comprehensive impact assessment of Brexit on women's rights.¹⁴ A separate 'Equality Analysis' of the Withdrawal Bill conducted in July 2017¹⁵ is generic and focussed on how equality rights will be protected.

The Scottish Government did publish an independent report on the Social and Equality Impacts of Brexit prior to the Withdrawal Agreement Act,¹⁶ although this amounts to a case study of available evidence and estimated impacts of various Brexit outcomes. In Wales, a Women in Europe Network hosted by the National Assembly's Cross-Party Group on Women was established.¹⁷

The Withdrawal Agreement's Northern Ireland Protocol includes a commitment to the non-diminution of existing rights set out in the Belfast/Good Friday Agreement, overseen by a dedicated mechanism.¹⁸ There is no commitment to keeping pace with future changes.

There is also concern in relation to devolution rights, as many competencies returned from the EU have been placed under central, reserved laws.¹⁹

Finally, there is widespread concern that the economic impact of leaving the EU – now augmented by the Covid-19 pandemic – will impact directly on women's long-term employment opportunities and that economic hardship will lead to cuts to public services and austerity measures, which will have a significantly disproportionate impact on women, particularly Black, minoritised, low-incomed, and disabled women.

¹³ UK Government, 'New Withdrawal Agreement and Political Declaration', GOV.UK, accessed 16 September 2021, <https://www.gov.uk/government/publications/new-withdrawal-agreement-and-political-declaration>.

¹⁴ An 'Impact Assessment' was published alongside the European Union (Withdrawal Agreement) Bill in October 2019, stating: "These provisions [in the Withdrawal Bill] have no undue effect on particular racial groups, income groups, gender groups, age groups, people with disabilities, or people with particular religious views." This is available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/841245/EU_Withdrawal_Agreement_Bill_Impact_Assessment.pdf

¹⁵ UK Government, 'European Withdrawal Bill Equality Analysis', 2017, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/629244/European_Union_Withdrawal_Bill_equality_analysis.pdf.

¹⁶ Scottish Government, 'Brexit: Social and Equality Impacts', accessed 16 September 2021, <http://www.gov.scot/publications/social-equality-impacts-brexit/pages/5/>.

¹⁷ Brexit: Voices of Women in Wales Matter Working paper by the cross-party Women in Europe (Wales) Network, hosted by the National Assembly for Wales' Cross-Party Group on Women Last updated: 30 October 2019

¹⁸ UK Government, 'Revised Protocol to the Withdrawal Bill on Ireland/Northern Ireland', 2019, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/840230/Revised_Protocol_to_the_Withdrawal_Agreement.pdf.

¹⁹ Scottish Government, 'After Brexit: The UK Internal Market Act and Devolution', 2021, <http://www.gov.scot/publications/brexit-uk-internal-market-act-devolution/pages/6/>.

RECOMMENDATION:

There is an urgent need for much more rigorous and gender-sensitive analysis of the impact of Brexit, including for future trade deals.

3.2 Failure to protect migrant women

The EU Settlement scheme required all EU and EEA citizens planning to continue living in the UK to apply for regularised immigration status by 30 June 2021.²⁰ The scheme provides successful applicants with ‘settled status’, comparable to indefinite leave to remain, securing rights such as access to healthcare and education. Very limited statistics on the scheme are produced,²¹ but barriers including language, digital access or an abusive partner who may control access to proof of status create risks for women who are EU nationals. EU migrants who are not eligible for the EU Settled Status Scheme will be subject to No Recourse to Public Funds (NRPF), meaning that undocumented women as well as future arrivals may be at risk of destitution because they are excluded from public services.²²

The UK’s replacement of free movement rights with a points-based migration scheme fails to consider the position of women in the economy and the impacts of occupational segregation. Male dominated sectors are privileged under the scheme, while skills in sectors such as health and care, dominated by women, are unrecognised despite high numbers of vacancies.²³

New rules further limit access to legal aid for immigration and asylum cases by making it financially impossible for lawyers to take on complex cases.²⁴ This makes

²⁰ ‘Apply to the EU Settlement Scheme (Settled and Pre-Settled Status)’, GOV.UK, accessed 24 November 2020, <https://www.gov.uk/settled-status-eu-citizens-families>,

²¹ ‘EU Settlement Scheme Statistics’, GOV.UK, accessed 24 November 2020, <https://www.gov.uk/government/collections/eu-settlement-scheme-statistics>.

²² NRPF Network, ‘Local Authority Support for People with No Recourse to Public Funds (NRPF) – Policy Recommendations’, 2019, <https://www.nrpfnetwork.org.uk/-/media/microsites/nrpf/documents/policy/policy-issues-and-nrpf-overview.pdf?la=en&hash=C78B5C26A9AF924764084F0CA6D31D651BBF8FAD>.

²³ The proposed approach furthers the systemic undervaluation of women’s work in sectors like care, where pay is significantly lower and frequently below the mandated earning thresholds in the new visa scheme, and undermines women’s rights in shrinking the sector and potentially redistributing care back to the household and reducing support options for disabled women. Women’s Budget Group, ‘WBG Statement on Immigration Reform: Discrimination by Design’, *WBG Statement on Immigration Reform: Discrimination by Design* (blog), 19 February 2020, <https://wbg.org.uk/analysis/wbg-statement-on-immigration-reform-discrimination-by-design/>.

²⁴ UK Government, ‘The Civil Legal Aid (Remuneration) (Amendment) (Coronavirus) Regulations 2020’ (Queen’s Printer of Acts of Parliament), accessed 16 September 2021, <https://www.legislation.gov.uk/uksi/2020/515/made>.

Even before this minoritised women who are subjected to VAWG including so-called honour-based violence, forced marriage, and trafficking, will continue to face barriers to legal support with a 56% drop in the number of asylum and immigration legal aid providers since 2005.

NACCOM, Refugee Action, ‘Tipping the Scales: Access to Justice in the Asylum System’, 2018, <https://www.refugee-action.org.uk/wp-content/uploads/2018/07/Access-to-Justice-July-18-1.pdf>.

it even more difficult for women to claim asylum.²⁵ We are extremely concerned by planned new detention centres for women²⁶ following the closure of Yarl's Wood, which was dogged by accusations of sexual abuse,²⁷ hunger strikes²⁸ and critical inspection reports,²⁹ and where women were threatened with accelerated deportation.³⁰ While the Welsh Government's 'Nation of Sanctuary' aspiration for refugees and asylum seekers is commendable, this does not extend to migrant survivors with insecure immigration status who still experience inequitable access to safety and support.³¹

3.3 Possible regression in rights and equality standards

Equality protections in the UK, including the Equality Act, has strong roots in EU membership. EU legislation covering parental leave, protections for pregnant women and new mothers, protections for agency and part-time workers is now enshrined in UK law;³² however, this does not offer future guarantees against lowering standards.

Women in the UK can no longer rely on the Court of Justice of the European Union, which has proved a vital 'backstop' on sex discrimination cases.³³ The refusal to incorporate the European Charter of Fundamental Rights is especially concerning considering the UK Government's approach to Human Rights Act, which enshrines the European Convention on Human Rights in UK law.³⁴

²⁵ 'Women for Refugee Women': Women's Safety Threatened by New Asylum Proposals', *Women for Refugee Women* (blog), 24 March 2021, <https://www.refugeewomen.co.uk/womens-safety-threatened-by-new-asylum-proposals/>.

²⁶ 'Women for Refugee Women': Stop the New Detention Centre for Women at Hassockfield, County Durham', *Women for Refugee Women* (blog), 26 February 2021, <https://www.refugeewomen.co.uk/stop-the-new-detention-centre/>.

²⁷ Mark Townsend and home affairs editor, 'Sexual Abuse Allegations Corroborated at Yarl's Wood Immigration Centre', *The Observer*, 21 September 2013, sec. UK news, <https://www.theguardian.com/uk-news/2013/sep/21/sexual-abuse-yarls-wood-immigration>.

²⁸ Alan Travis, 'Minister Defends Threats over Yarl's Wood Hunger Strike', *The Guardian*, 6 March 2018, sec. UK news, <https://www.theguardian.com/uk-news/2018/mar/06/minister-defends-deportation-threats-over-yarls-wood-hunger-strike>.

²⁹ Alan Travis, 'More Rape and Torture Victims Being Held at Yarl's Wood, Report Says', *The Guardian*, 15 November 2017, sec. UK news, <https://www.theguardian.com/uk-news/2017/nov/15/yarls-wood-chief-inspector-prisons-report-rape-torture>.

³⁰ Medical Justice confirmed it had been consulted but said it had been highly critical of the policy. It said it had voiced concern at the time about the threat to expedite removals.

³¹ Welsh Government, 'Nation of Sanctuary – Refugee and Asylum Seeker Plan', 2019, https://gov.wales/sites/default/files/publications/2019-03/nation-of-sanctuary-refugee-and-asylum-seeker-plan_0.pdf.

Immigration legislation is a reserved matter, however legal advice obtained by the VAWG sector suggests that devolved nations do have competence to provide some funding, such as a last resort destitution fund, for the purpose of ensuring that survivors have access to a baseline safety net of support, which would reduce significantly the risk to migrants with NRPF. This would offer some protection however, ultimately, the VAWG sector believes that the NRPF rule should be scrapped.

³² Kathryn Sturgeon, 'Rights after Brexit: What Will Change?' (Brexit Civil Society Alliance, 2020), <https://static1.squarespace.com/static/5b9265d0ee175944bdd8fc5d/t/5f460da447206033d50a929c/1598426533472/Report+Rights+After+Bretxit+V3+%281%29.pdf>.

³³ '#FaceHerFuture | The Fawcett Society', accessed 16 September 2021, <https://www.fawcettsociety.org.uk/faceherfuture>.

³⁴ UK Government, 'Independent Human Rights Act Review', GOV.UK, accessed 16 September 2021, <https://www.gov.uk/guidance/independent-human-rights-act-review>.

RECOMMENDATION:

That the UK Government urgently undertakes a review of post-Brexit measures in respect of gender and works with the Women and Equalities Select Committee to act upon the findings across all government departments, including committing to stronger protection for women's rights as part of trade deal negotiations.

4. ESTABLISHING A NATIONAL MACHINERY ON WOMEN'S HUMAN RIGHTS (PARAGRAPH 25)

4.1 Participation of women's organisations

There remains no formal mechanism for women's organisations to engage in UK level policymaking, or ensure that the voices of Black and minoritised women's organisations, disabled women's organisations³⁵ and gypsy / traveller groups,³⁶ are able to participate.³⁷

4.2 Oversight

There is no organisation with the powers required to ensure the UK is meeting its CEDAW obligations. The effectiveness of the EHRC as an oversight mechanism has been increasingly undermined by a series of political appointments to Commissioner positions³⁸ and serious under-resourcing.³⁹

The UK Government's recent statements have substantially accelerated these concerns; a new direction for equalities policy implies a shift towards geographic and socioeconomic inequality with greater emphasis on individual circumstances, effectively away from protected characteristics.⁴⁰ The Westminster Women and Equalities Committee has called for strengthening of the oversight role in an

³⁵ Sisters of Frida, 'Disabled Women in the UK: Key Facts and Stats', 2017, <https://www.sisofrida.org/wp-content/uploads/2017/08/Disabled-women-Facts-and-Stats-2017.pdf>.

³⁶ The [Women and Equality Committee s.6 of their report](#) on the inequalities faced by Gypsy, Roma, and Traveller communities makes recommendations for change that this VAWG Strategy has the opportunity to act upon.

³⁷ The non-advocacy or 'gagging clauses' introduced by the UK government in 2016 further restrict the opportunity of women's organisations to be heard at UK-level; see eg. UK Government, 'Government Announces New Clause to Be Inserted into Grant Agreements', *GOV.UK* (blog), accessed 16 September 2021, <https://www.gov.uk/government/news/government-announces-new-clause-to-be-inserted-into-grant-agreements>.

³⁸ Haroon Siddique, 'Politicising the EHRC? Five Controversial Appointments', *The Guardian*, 30 November 2020, sec. Society, <https://www.theguardian.com/society/2020/nov/30/politicising-ehrc-five-controversial-appointments>.

³⁹ The EHRC budget has been cut since 2007 from £70 million to £17 million

⁴⁰ UK Government, 'Fight For Fairness: Speech by Minister for Women and Equalities Liz Truss, 17 December 2020', *GOV.UK* (blog), accessed 16 September 2021, <https://www.gov.uk/government/speeches/fight-for-fairness>.

Inquiry into the role of the Government Equalities Office, which has been reformed in light of shifting equality policy.⁴¹

RECOMMENDATION:

The UK Government should establish an independent, transparent accountable mechanism to ensure women and women's organisations, reflecting regionality, diversity and representation across the UK can meaningfully engage with policy making.

5. THE IMPACT OF COVID-19 AND PUBLIC HEALTH MEASURES ON WOMEN AND GIRLS

5.1 Managing the crisis

Covid-19 has exposed and exacerbated the inequalities that were deeply rooted within the UK. While the UK and devolved governments introduced some measures to mitigate the impacts of the crisis, such as a Coronavirus Job Retention Scheme ('furlough') payment worth up to 80% of monthly pay,⁴² this falls far below what is needed.⁴³ Only 29% women agree that women's specific needs have been considered and responded to well by the UK Government.⁴⁴

Gender was largely absent from the government's response to the crisis.⁴⁵ Despite higher death rates amongst Black and Asian groups, no targeted policy and healthcare responses were put in place. In response to calls for the UK Government to publish an impact assessment of the non-pharmaceutical interventions introduced in response to the pandemic, the UK Minister for Women and Equalities, Liz Truss, responded that such an assessment could not be published even if it were undertaken.⁴⁶

⁴¹ UK Government, 'How Can We Put Equalities at the Heart of Government? - Committees - UK Parliament', accessed 16 September 2021, <https://committees.parliament.uk/committee/328/women-and-equalities-committee/news/138432/how-can-we-put-equalities-at-the-heart-of-government/>.

⁴² UK Government, 'Coronavirus (COVID-19): What to Do If You're Employed and Cannot Work', GOV.UK, accessed 16 September 2021, <https://www.gov.uk/guidance/coronavirus-covid-19-what-to-do-if-youre-employed-and-cannot-work>.

⁴³ Laura Jones and Rose Cook, 'Does Furlough Work for Women?' (King's College), accessed 16 September 2021, <https://www.kcl.ac.uk/news/women-losing-out-under-furlough-scheme>.

This paper shows that women have fared worse than men under the furlough scheme, as the hardest hit sectors are female dominated and characterised by low pay, while the furlough scheme does not guarantee job security.

⁴⁴ Women's Budget Group, 'One Year on: Women Are Less Likely than Men to Feel the Government's Response to Covid-19 Has Met Their Needs', 2021, https://wbg.org.uk/wp-content/uploads/2021/03/Round-2-general-brief_FINAL-COPY.pdf.

⁴⁵ Clare Wenham and Asha Herten-Crabb, 'Why We Need a Gender Advisor on SAGE', *LSE Public Policy Review* 1, no. 4 (3 May 2021): 7, <https://doi.org/10.31389/lseppr.25>.

⁴⁶ UK Government, 'Committee to Question Women and Equalities Minister Liz Truss - Committees - UK Parliament', accessed 16 September 2021, <https://committees.parliament.uk/work/227/unequal-impact-coronavirus-covid19-and-the-impact-on-people-with-protected-characteristics/news/115190/committee-to-question-women-and-equalities-minister-liz-truss/>.

The Scottish Government's obligation to conduct and publish EQIAs continued throughout the pandemic, however these were often an incomplete post rationalisation.⁴⁷ The Coronavirus (Scotland) Act requires the Scottish Government to have due regard to opportunities to advance equality and eliminate discrimination when imposing measures to manage the pandemic,⁴⁸ however there is no evidence that this provision has been utilised.

In Northern Ireland, the women's sector produced a Feminist Recovery Plan,⁴⁹ which to date has led to no action, while responses demonstrate a poor policy framework and practice in respect of securing gender equality.⁵⁰ In Wales, a women's Manifesto on closing the gap on gender inequality included recommendations on Covid-19 and women's rights.⁵¹

5.2 Health

The UK's excessively high COVID-19 mortality rate has exposed deep structural health inequalities. Disabled women were 3.2 times more likely to die (March 2020-January 2021) compared to non-disabled women.⁵² A third of people critically ill have been from Black and minority ethnic communities and COVID-19 is having a negative impact on Black and minority ethnic people's access to health and social care support.⁵³ Over 50% of Black and minority ethnic people were "not sure where to turn for help" during the pandemic, and also reported greater risks to job and income security.⁵⁴

⁴⁷ Engender, 'Submission of Evidence to the Equality and Human Rights Inquiry on the Impact of COVID-19 Pandemic on Equalities and Human Rights', 2020, <https://www.engender.org.uk/content/publications/Engender-submission-of-evidence-EHRiC-inequalities-and-Covid19.pdf>.

⁴⁸ Scottish Parliament 'Coronavirus (Scotland) Act 2020', Text (Statute Law Database), accessed 16 September 2021, <https://www.legislation.gov.uk/asp/2020/7/contents>.

⁴⁹ Women's Policy Group NI, 'Covid-19 Feminist Recovery Plan', 2020, <https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020.pdf>.

⁵⁰ Response to Feminist Recovery Plan by Northern Ireland Departments, unpublished

⁵¹ WEN Wales, 'Manifesto for Closing the Gap on Gender Inequality in Wales', *Manifesto for Closing the Gap on Gender Inequality in Wales* (blog), 2021, <https://wenwales.org.uk/campaign/our-manifesto-equality-for-women-and-girls-in-wales/>.

⁵² Disability Rights UK, 'Disabled People between 3 and 4 Times More Likely to Die of Coronavirus - ONS | Disability Rights UK', accessed 16 September 2021, <https://www.disabilityrightsuk.org/news/2021/february/disabled-people-between-3-and-4-times-more-likely-die-coronavirus-ons>.

⁵³ A third of people critically ill with COVID-19 are from ethnic minorities, even though they make up only 13% of the population (Mama Health and Poverty Partnership and WRC submission to Mayor of Manchester). Shirley Sze et al., 'Ethnicity and Clinical Outcomes in COVID-19: A Systematic Review and Meta-Analysis', *EClinicalMedicine* 29–30 (December 2020): 100630, <https://doi.org/10.1016/j.eclinm.2020.100630>.

⁵⁴ Women's Budget Group, 'BAME Women and Covid-19', *BAME Women and Covid-19* (blog), 8 June 2020, <https://wbg.org.uk/analysis/bame-women-and-covid-19/>.

Protection from the virus was not immediately prioritised in ensuring adequate PPE for female physques in both health⁵⁵ and (particularly) social care settings.⁵⁶ Women also appear at greater risk of long-lasting Covid-19 symptoms ('long-Covid'), potentially undermining their quality of life and earning potential long term.⁵⁷ Women with chronic illness already report feeling isolated and excluded within the pandemic response.⁵⁸

Women are extremely likely to report concerns about the ongoing impact of the pandemic on their mental health,⁵⁹ while Black and minoritised women's organisations saw a markedly greater demand in women presenting with mental health issues than other women's organisations.⁶⁰ Women were more likely to have been advised to shield have been more likely to be impacted by the indirect consequences of shielding due to provision of unpaid care.⁶¹

There has been a consistent lack of clarity for pregnant women about how to manage health risks appropriately, including inconsistent and delayed vaccine advice.⁶² Pregnant women and new mothers have also seen explicit restrictions on healthcare, including limited partner support at appointments and throughout

⁵⁵ Royal College of Nursing, 'RCN Calls for More Protective Equipment for Staff during COVID-19 Crisis | Scotland | Royal College of Nursing', *RCN Calls for More Protective Equipment for Staff during COVID-19 Crisis* (blog) (The Royal College of Nursing, 23 March 2020), <https://www.rcn.org.uk/news-and-events/news/rcn-writes-to-fm-re-ppe-23-mar-2020>.

⁵⁶ GMB union, 'Re: Personal Protective Equipment (PPE) for All Health and Social Care Staff', 2021, <https://gmb.org.uk/sites/default/files/DHSC-letter-PPE-Health-Social-Care-120121.pdf>.

⁵⁷ Carole H. Sudre et al., 'Attributes and Predictors of Long-COVID: Analysis of COVID Cases and Their Symptoms Collected by the Covid Symptoms Study App', preprint (Infectious Diseases (except HIV/AIDS), 21 October 2020), <https://doi.org/10.1101/2020.10.19.20214494>.

NICE, 'Equality Impact Assessment - Managing the Long-Term Effects of COVID-19', 2020, <https://www.nice.org.uk/guidance/ng188/documents/equality-impact-assessment..>

These guidelines have thus far paid little attention to gendered differences in long-COVID and the NICE EQIA did not adequately engage with inequalities pertaining to sex, dismissing the emerging evidence that women are more likely to report long-Covid.

⁵⁸ Dr Anna Ruddock and Dr Anna Gkiouleka, 'Centre for Welfare Reform: I Feel Forgotten', Centre for Welfare Reform, accessed 16 September 2021, <https://centreforwelfarereform.org/library/i-feel-forgotten.html>.

⁵⁹ Women's Resource Centre, 'The Impact of the COVID-19 Crisis on the UK Women's Sector | Women's Resource Centre', accessed 16 September 2021, <https://www.wrc.org.uk/the-impact-of-the-covid-19-crisis-on-the-uk-womens-sector>.

Women (37%) are more likely than men (20%) to report that there has been a decline in their health during the pandemic. See: Health Improvement Scotland, 'Seventh Citizens' Panel Report', HIS Engage, 24 February 2021, <https://hisengage.scot/informing-policy/citizens-panel/seventh-panel-report/>.

⁶⁰ Women's Resource Centre, 'The Covid-19 Crisis and the UK Women's Sector: One Year On...', 2021, <https://www.wrc.org.uk/Handlers/Download.ashx?IDMF=8683fd98-b697-47dc-b387-14ad6e777338>.

⁶¹ the ALLIANCE, 'Response to the Scottish Government's Question Set for Stakeholder Organisations on Shielding - next Steps', 2020, <https://www.alliance-scotland.org.uk/wp-content/uploads/2020/06/ALLIANCE-Response-Shielding-next-steps-question-set-for-stakeholder-organisations-12.06.2020.pdf>.

⁶² Initially, pregnant women and new mothers were advised not to receive the vaccine despite evidence of higher risks of Covid-19. In April 2021, the guidance was changed to state that all pregnant women are eligible for the vaccine. Any health inequalities caused by this delay, including any resulting vaccine hesitancy, will need to be addressed.

and after labour,⁶³ leading to increasing anxiety and isolation.⁶⁴

Rules in England, Wales⁶⁵ and Scotland⁶⁶ were introduced to ensure telemedical access to medical abortion could be managed entirely from home as a temporary measure in response to the pandemic and the governments are consulting on making this permission permanent. No such provision was made for Northern Ireland, where the Executive failed to implement the Abortion Regulations (Northern Ireland) 2020, requiring Westminster to enact legislation demanding implementation. Women in Northern Ireland remain unable to access safe and legal abortion.⁶⁷

Proposed reform of the Gender Recognition Act governing Great Britain was rejected by the UK government⁶⁸ and similar reforms paused in Scotland, perpetuating discrimination of trans people. In Northern Ireland, no referrals to the gender identity clinic have been accepted since 2018 and a review of the service is stalled.⁶⁹

5.3 Unpaid care and reproductive labour

The pandemic has underlined the UK's reliance on women's paid and unpaid care work, but it has not been adequately integrated into decision-making.

The pandemic has exacerbated the volume of unpaid work through the closure of schools and nurseries and the limitations on accessing childcare, public services and leisure facilities as well as social care. Home-schooling⁷⁰ and other care

⁶³ WHO, 'Companion of Choice during Labour and Childbirth for Improved Quality of Care', 2020, <https://apps.who.int/iris/bitstream/handle/10665/334151/WHO-SRH-20.13-eng.pdf>.

⁶⁴ the ALLIANCE, 'Health, Wellbeing and the Covid-19 Pandemic. Scottish Experiences and Priorities for the Future', 2021, <https://www.alliance-scotland.org.uk/wp-content/uploads/2021/02/Health-Wellbeing-and-the-COVID-19-Pandemic-Final-Report.pdf>.

Maternal Mental Health Alliance, 'Maternal Mental Health during a Pandemic: A Rapid Evidence Review of Covid-19's Impact', 2020, <https://maternalmentalhealthalliance.org/mmhpanemic/>.

⁶⁵ UK Government, 'Temporary Approval of Home Use for Both Stages of Early Medical Abortion', GOV.UK, accessed 17 September 2021, <https://www.gov.uk/government/publications/temporary-approval-of-home-use-for-both-stages-of-early-medical-abortion--2>.

⁶⁶ Scottish Government and Chief Medical Officer, 'Abortion – Covid-19 – Approval For Mifepristone To Be Taken At Home And Other Contingency Measures', 2020, [https://www.sehd.scot.nhs.uk/cmo/CMO\(2020\)09.pdf](https://www.sehd.scot.nhs.uk/cmo/CMO(2020)09.pdf).

⁶⁷ Access to services is a postcode lottery, 18 months following the Regulations and almost two years after the Northern Ireland (Executive Formation etc) Act 2019 that decriminalised abortion. Further detail is provided in the Northern Ireland interim shadow report.

⁶⁸ Catherine Fairbairn, Douglas Pyper, and Manjit Gheera, 'Gender Recognition Reform: Consultation and Outcome', 17 September 2021, <https://commonslibrary.parliament.uk/research-briefings/cbp-9079/>.

⁶⁹ See eg. Michele Theil, 'Transgender Healthcare Is at Breaking Point In This Corner of Europe', 2021, <https://www.vice.com/en/article/n7vk3q/transgender-healthcare-is-at-breaking-point-in-this-corner-of-europe>. Further detail is also provided in the Northern Ireland interim shadow report.

⁷⁰ Daniela Del Boca et al., 'Women's and Men's Work, Housework and Childcare, before and during COVID-19', *Review of Economics of the Household* 18, no. 4 (December 2020): 1001–17, <https://doi.org/10.1007/s11150-020-09502-1>.

severely impacts women's position in the labour market.⁷¹ While furlough was eventually extended to parents who may be unable to do paid work while schools and nurseries were closed⁷² 71% of mothers requesting it have been refused.⁷³

Affordability of childcare across the UK⁷⁴ remains a significant issue, and the COVID-19 restrictions have cast doubt on the sustainability of the sector.⁷⁵ There has been no progress on a childcare strategy for Northern Ireland⁷⁶ and in Scotland, a planned increase of funded childcare to 1140 hours was paused until August 2021.⁷⁷

Carers have been hit hard as caring responsibilities have impacted on their ability to work.⁷⁸ The community and voluntary sector has reported instances where Health and Social Partnerships have increased their eligibility criteria for social care, making it harder to access.⁷⁹ Responsibility for care is therefore redistributed from the state to households – one in four people now provide unpaid care, around 60% of whom are women.⁸⁰

⁷¹ Women's Resource Centre, 'The Impact of the COVID-19 Crisis on the UK Women's Sector | Women's Resource Centre'. This report showed that almost half of women's organisations surveyed reported that their service users had a 'substantial' and 'high priority' need to access childcare.

TUC, '2 in 5 Working Mums Face Childcare Crisis When New Term Starts – TUC Poll', Text, TUC, 3 September 2020, <https://www.tuc.org.uk/news/2-5-working-mums-face-childcare-crisis-when-new-term-starts-tuc-poll>.

Mothers were one-and-a-half times more likely to have lost their jobs or quit than fathers over the first lockdown and averaged a loss of two hours of earnings per day, see [Alison Andrew et al., 'How Are Mothers and Fathers Balancing Work and Family under Lockdown?', 27 May 2020, https://doi.org/10.1920/BN.IFS.2020.BN0290](#).

⁷² UK Government, 'Coronavirus (COVID-19)'.

⁷³ TUC, 'Working Mums: Paying the Price', 2021, <https://www.tuc.org.uk/workingparents>.

⁷⁴ "Very Challenging and the Most Stressful Time of My Life": Major Study Highlights Childcare Challenges Exacerbated by Covid-19', Employers For Childcare, accessed 17 September 2021, <https://www.employersforchildcare.org/news-item/very-challenging-and-the-most-stressful-time-of-my-life-major-study-highlights-childcare-challenges-exacerbated-by-covid-19/>.

⁷⁵ Reduced income means an increase in fees, putting childcare out of reach for more families, or reduced services, which further reduce accessibility and risks the jobs of an overwhelmingly female workforce. The Northern Ireland Executive made a support package for the childcare sector available in 2020 and restrictions on childcare settings were reduced in subsequent lockdowns as part of NPIs in each nation; however, the failure to recognise the centrality of childcare further demonstrates the lack of consideration of gender.

⁷⁶ There was a commitment to a childcare strategy in the New Decade, New Approach agreement that restored devolved institutions in January 2020, but work on a strategy was put on hold due to COVID-19, see eg. Jonathan McCambridge, 'McIlveen Pledges to Bring Forward Childcare Strategy for Northern Ireland - BelfastTelegraph.Co.Uk', *Belfast Telegraph*, accessed 17 September 2021, <https://www.belfasttelegraph.co.uk/news/northern-ireland/mcilveen-pledges-to-bring-forward-childcare-strategy-for-northern-ireland-40594385.html>.

⁷⁷ Scottish Government, 'Early Education and Care: Early Learning and Childcare Expansion - Gov.Scot', accessed 17 September 2021, <https://www.gov.scot/policies/early-education-and-care/early-learning-and-childcare/>.

⁷⁸ Carers Week, 'Carers Week 2020 Research Report', 2020, https://www.carersuk.org/images/CarersWeek2020/CW_2020_Research_Report_WEB.pdf.

⁷⁹ Karen Hodgson et al., 'Adult Social Care and COVID-19. Assessing the Impact on Social Care Users and Staff in England so Far' (The Health Foundation, 30 July 2020), <https://doi.org/10.37829/HF-2020-Q16>.

⁸⁰ Carers Week, 'Carers Week 2020 Research Report'.

5.4 Income and paid work

Women were more likely to lose or leave their jobs due to the pandemic with 75% of women (compared to 18 % of men) responsible for children.⁸¹ One in four women are considering downshifting or leaving the workforce entirely.⁸² The sectors most disrupted are those where women's employment is disproportionately higher,⁸³ affecting young women,⁸⁴ and Black and minoritised women.⁸⁵

The pandemic is predicted to push a further two million families into poverty.⁸⁶ The sale of sex is increasing as rates of poverty increase⁸⁷ and the design of UK social security undermines women's economic independence, dignity and makes it more difficult for women to leave an abusive partner⁸⁸. Women with NRPF find it especially difficult to access refuge⁸⁹ and benefit rules discriminate against disabled women.⁹⁰ No changes have been made since the Concluding

⁸¹ De Montfort University, 'Research Shows Covid-19 Has Impacted Professional Women More than Men', 2020, <https://www.dmu.ac.uk/about-dmu/news/2020/october/research-shows-covid-19-has-impacted-professional-women-more-than-men.aspx>.

⁸² McKinsey and LeanIn.org, 'Women in the Workplace', 2020, <https://www.mckinsey.com/featured-insights/diversity-and-inclusion/women-in-the-workplace>.

⁸³ Xiaowei Xu and Robert Joyce, 'Sector Shutdowns during the Coronavirus Crisis: Which Workers Are Most Exposed?', 6 April 2020, <https://doi.org/10.1920/BN.IFS.2020.BN0278>.

⁸⁴ UK Government, 'The Potential Economic Impact of the 4-Week Circuit Breaker', 2020, <https://www.economy-ni.gov.uk/sites/default/files/publications/economy/4-Week-Circuit-Breaker-Impact-Paper.pdf>.

⁸⁵ Close the Gap, 'Disproportionate Disruption: The Impact of Covid-19 on Women's Labour Market Equality', 2020, <https://www.closesthegap.org.uk/content/resources/Disproportionate-Disruption---The-impact-of-COVID-19-on-womens-labour-market-equality.pdf>.

⁸⁶ Patrick Butler 'Covid-Driven Recession Likely to Push 2m UK Families into Poverty', *The Guardian*, 9 December 2020, sec. Society, <https://www.theguardian.com/society/2020/dec/09/covid-driven-recession-likely-to-push-2m-uk-families-into-poverty>.

⁸⁷ UK Government, 'Paying the Price: A Consultation Paper on Prostitution - Social Care Online', 2004, <https://www.scie-socialcareonline.org.uk/paying-the-price-a-consultation-paper-on-prostitution/r/a11G0000017txVIAQ>.

⁸⁸ Key issues include benefit sanctions, the two-child limit, five-week wait for a first payment ADDIN ZOTERO_ITEM CSL_CITATION {"citationID": "XIIINdj3", "properties": {"formattedCitation": "Women's Resource Centre, 'The Covid-19 Crisis and the UK Women's Sector: One Year On...'", "plainCitation": "Women's Resource Centre, 'The Covid-19 Crisis and the UK Women's Sector: One Year On...'", "noteIndex": 88}, "citationItems": [{"id": "90", "uris": ["http://zotero.org/users/local/9UwZcAf2/items/SBIMBBP2"], "uri": "http://zotero.org/users/local/9UwZcAf2/items/SBIMBBP2"}, {"id": "90", "type": "report", "title": "The Covid-19 Crisis and the UK women's sector: one year on...", "URL": "https://www.wrc.org.uk/Handlers/Download.ashx?IDMF=8683fd98-b697-47dc-b387-14ad6e777338", "author": {"literal": "Women's Resource Centre"}, "issued": {"date-parts": [{"2021"}]}}, {"schema": "https://github.com/citation-style-language/schema/raw/master/csl-citation.json"}] Women's Resource Centre, 'The Covid-19 Crisis and the UK Women's Sector: One Year On...'. See eg. Women's Regional Consortium, 'Women's Regional Consortium Response to Work & Pensions Committee Inquiry into Universal Credit Five Week Wait for First Payment', accessed 16 September 2021, <https://committees.parliament.uk/writtenevidence/1838/html/>.

The introduction single household universal credit payment has also been raised as a core concern, see eg. Women's Budget Group, 'Universal Credit and Financial Abuse: Exploring the Links', *Universal Credit and Financial Abuse: Exploring the Links* (blog), 12 June 2018, <https://wbg.org.uk/analysis/universal-credit-and-financial-abuse-exploring-the-links/>.

⁸⁹ Imkaan and EVAW, 'Joint Briefing: Adjournment Debate: Black Women and Domestic Abuse', 2020, <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/Joint-Briefing-for-Meg-Hillier-MP-Debate-EVAW-Imkaan.pdf>.

⁹⁰ Disabled women are prevented both from leaving abusive relationships and moving in with or marrying a partner, as benefits are affected by a partner's income

Observations in 2019. A £20 per week increase to Universal Credit of introduced in 2020 is being cut from the end of September 2021.⁹¹

RECOMMENDATION:

Urgent policies to meet the disproportionate impacts on women, especially young, disabled, Black and minority ethnic women and LGBTQI+ people, must be introduced alongside Covid-19 recovery plans and action must be taken to ensure that gender expertise is integrated into all future crisis preparedness planning.

RECOMMENDATION:

Free childcare should be available to all parents from birth and investment must be made in the childcare and early years sectors.

6. VIOLENCE AGAINST WOMEN AND GIRLS

Women experiencing gender-based violence face heightened barriers to safety, justice, and services. The sector is facing an estimated loss of £250m in funding after Brexit, with no guarantee that the UK Prosperity Fund⁹² will plug the gap. A commitment to developing a sustainable funding model was made in the Welsh Government National Strategy 2016-2021, however this has not been met, despite a proposed outline being presented by Welsh Women's Aid.⁹³ During the pandemic, the Scottish Government did make additional funding for national services available early in the crisis,⁹⁴ while in England a legal challenge to the UK Government's failure to provide emergency funding for abused women did elicit some additional emergency funding.⁹⁵ However, there was no ring-fenced funding for organisations supporting migrant women and those with NRPF and the extra funding fell far below actual demand.⁹⁶

⁹¹ HM Treasury, 'BUDGET 2021: Protecting the Jobs and Livelihoods of the British People', 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/966868/BUDGET_2021_-_web.pdf.

⁹² Equally Ours, 'UK Shared Prosperity Fund: Equal by Design', n.d., <https://www.equallyours.org.uk/wp-content/uploads/2020/12/Equally-Ours-UKSPF-briefing-February-2020.pdf>.

⁹³ Disability Wales and Welsh Women's Aid, 'Supporting Disabled People Experiencing Violence against Women, Domestic Abuse and Sexual Violence in Wales', n.d., <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/04/WWA-and-Disability-Wales-2019-report-Final-ENG.pdf>during-covid-19-outbreak/.

⁹⁴ Scottish Government, 'Support for Victims of Domestic Violence during COVID-19 Outbreak', accessed 16 September 2021, <http://www.gov.scot/news/support-for-victims-of-domestic-violence-during-covid-19-outbreak/>.

⁹⁵ Samir Jeraj, 'Domestic Violence Funding Legal Challenged Launched', *New Statesman*, 27 April 2020, <https://www.newstatesman.com/science-tech/coronavirus/2020/04/domestic-violence-funding-legal-challenged-launched>.

⁹⁶ The increase in demand for services was the top cited most pressing challenge facing women's organisations in the UK according to survey findings: Women's Resource Centre, 'The Covid-19 Crisis and the UK Women's Sector: One Year On...'

Lockdown and other NPIs increased opportunities for abusers to perpetrate harm to women and restricted women's ability to seek help and support. Although regulations did make clear that rules did not apply to women fleeing abuse and violence, this information was not always effectively communicated to police or the public. Services reported significant increases in calls for support, calls and contacts to the Refuge Helpline in increased by an average 66% over the first eight weeks of the spring 2020 lockdown. Police Service of Northern Ireland statistics confirm the 19,000 domestic crimes recorded in the year to December 2020 is the highest total since the data series began.⁹⁷ Scottish Women's Aid have reported difficulties in securing 'key worker status' and an increasing demand, placing pressure on the capacity to deliver support.⁹⁸ Across the UK, 76% of women's organisations reported a marked or substantial increase in demand during the pandemic.⁹⁹

Work on prevention of violence against women has further stalled. There has been little analysis of how budgets across government agendas invest in prevention and protecting and supporting survivors. The Welsh Government is currently working on a new National Strategy for VAWG in line with the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 and has committed to a public health approach with a greater emphasis on prevention and early intervention, informed by the sector and survivors in Wales. The Domestic Abuse Act covering England and Wales was finally passed in April 2021,¹⁰⁰ 3 years after first being announced; yet, the government voted down amendments that would have extended protections to migrant women, as well as judiciary training around domestic violence. The Northern Ireland Executive recently committed a strategy on violence against women¹⁰¹ following a public campaign by Women's Aid

⁹⁷ PSNI Statistics, 'Domestic Abuse Incidents and Crimes Recorded by the Police in Northern Ireland', 2020, <https://www.psni.police.uk/globalassets/inside-the-psni/our-statistics/domestic-abuse-statistics/2020-21/q3/domestic-abuse-bulletin-dec-20.pdf>.

⁹⁸ Scottish Women's Aid, 'Crisis and Resilience: The Impact of a Global Pandemic on Domestic Abuse Survivors and Service Providers in Scotland', 2020, <https://womensaid.scot/wp-content/uploads/2020/09/SWA-COVID-Report.pdf>.

⁹⁹ Women's Resource Centre, 'The Covid-19 Crisis and the UK Women's Sector: One Year On...'

¹⁰⁰ UK Government, 'Domestic Abuse Act 2021: Overarching Factsheet', GOV.UK, accessed 16 September 2021, <https://www.gov.uk/government/publications/domestic-abuse-bill-2020-factsheets/domestic-abuse-bill-2020-overarching-factsheet>.

¹⁰¹ Naomi Long, 'Executive "Must Act on Violence against Women"', *BBC News*, 2021, <https://www.bbc.co.uk/news/uk-northern-ireland-56440234>.

Federation Northern Ireland¹⁰², but action is slow and legislation¹⁰³ still falls short of criminalising coercive control.¹⁰⁴

The UK has yet to guarantee a timeframe for ratifying the Istanbul Convention for ratification; however recent legislation in Northern Ireland¹⁰⁵ and England is addressing some issues relating to extra-territorial jurisdiction and criminalisation of psychological violence that have prevented ratification.¹⁰⁶

The Scottish Parliament has also passed the Domestic Abuse (Protection) (Scotland) Act, which enables perpetrators to be banned from homes and from contacting a person for a specified period. While welcome, the utility of these measures is weakened by the fact that while the UK continues to recognise European Domestic Protection Orders, the EU has not made reciprocal arrangements. Women in Northern Ireland are particularly affected by a lack of cooperation on justice, especially in border communities.

RECOMMENDATION:

The UK nations should ensure gendered, strategic approaches to ending all forms of VAWG, including gendered perspectives and informed by survivors, and with opportunities for coordination, where appropriate. This must also include abolishing the no recourse to public funds policy.



¹⁰² Women's Aid Federation NI, 'Press Release: Women's Aid Launch a Petition for a Violence Against Women and Girls Strategy in NI', *Women's Aid Launch a Petition for a Violence Against Women and Girls Strategy in NI* (blog), 9 March 2021, <https://www.womensaidni.org/press-release-womens-aid-launch-a-petition-for-a-violence-against-women-and-girls-strategy-in-ni/>.

¹⁰³ 'Domestic Abuse and Civil Proceedings Act (Northern Ireland) 2021', accessed 16 September 2021, <https://www.legislation.gov.uk/nia/2021/2/section/37>.

¹⁰⁴ Women's Aid Federation NI, 'Submission from Women's Aid Federation NI', accessed 16 September 2021, <http://www.niassembly.gov.uk/assembly-business/committees/2017-2022/health/responses-to-calls-for-evidence/domestic-abuse-and-family-proceedings-bill/submission-from-womens-aid-federation-ni/>, presented 28 May 2020 to the Justice Committee of the Northern Ireland Assembly

¹⁰⁵ A Protection from Stalking Bill 2021 was introduced to the Assembly in spring 2021 and the Department of Justice is consulting on proposals for a non-fatal strangulation offence at the time of writing in August 2021.

¹⁰⁶ Jennifer Scott, "'Troubling' Delay over Domestic Abuse Treaty, Say Lords", *BBC News*, 1 February 2021, sec. UK Politics, <https://www.bbc.com/news/uk-politics-55887909>.