

Comments on Action Plan, Action Areas, Specific Actions, Positive Actions, Key Action Areas and Pillars of Action

Comments by organisations, groups and individuals listed alphabetically under each of the headings identified as the main issues raised in the responses to the consultation.

The Belfast Butterfly Club - A direct reference to transgendered should be included in this section... Transgender related issues, the provision of goods and services on a non-discriminatory basis, stereotypes and prejudices and gender-related violence and abuse....

Access to employment and economic independence: ..virtually impossible for a transgendered person to obtain employment in Northern Ireland

Gender pay gap: Without the ability to gain employment in the preferred gender this question is currently inapplicable.

Enterprise creation/entrepreneurship: Society's non-acceptance of transgendered people prevents entrepreneurship e.g. no bank loans or grants for non-conforming people.

Education and lifelong learning (including vocational training): There is a great need for general education about what being transgendered actually means.

stereotypes and prejudices linked with women's and men's gender, marital or relationship status, or caring roles: Transgendered people are subject to stereotypes and prejudices all the time due to the general fear factor of something perceived to be different.

Housing/homelessness: Problems of housing due to prejudice.

Health and well-being (including suicide): Stress, depression and despair create the potential for greater levels of suicide.

Family diversity and parenting issues: ...transgendered people face the same prejudices and discrimination that gay people face.

Gender-related violence and abuse: Transgendered people are at constant risk of assault on the street..

Representation in public life and in senior decision-making roles: Transgendered people are perceived to be non-existent in public life or senior decision-making roles.

Belfast Jewish Community Centre - ...prioritise the following key action areas based on the needs of the community:

- Childcare/eldercare/caring role.
- Work-life balance.
- Pensions.
- Education and lifelong learning.

British Psychological Society - The key action areas are well defined. the analogy of 'pillars' does not take account of the potential sequencing of actions. For example, increasing awareness should precede further action. Perhaps the use of an analogy that includes a time dimension would be more appropriate. The action plan is very general in its scope. To see theory translated into action may require greater focus on practical issues and including specific timetables and targets. At the moment there is a danger that theory may not be translated into such actions without such detail.

Children in Northern Ireland (CiNI) - ... the equality impact of the high level elements of the strategy must be considered,.. ... strongly believe that there are already adverse equality impacts for girls and boys given that they are absent from the vision and principles. If adverse impacts of the high level elements of the strategy are not identified and dealt with appropriately there can be little confidence that the lower level operational elements of the strategy will promote equality of opportunity. .. support the key action areas being fully inclusive of all the action areas under these international obligations. ... at this point the strategy lacks clarity, fluidity and co-ordination with the introduction of concepts including operational objectives, actions and targets, yet the detail of these is not spelt out to allow commentary. ... would advocate that the five pillars of action are re-worked and developed as positive and pro-active outcome statements, with actions developed to deliver on these outcome statements accompanied by targets and associated indicators.

[On "Education/lifelong learning"].... Any actions that are being taken by the Department of Education in this area must be explicitly included in the strategy's action plan. [On "Crime and community safety"] ... welcome the inclusion of this key action area.. [On "Gender-related violence and abuse"].... additional specific actions must be targeted towards protection, support and justice for women, with explicit linkages to the Tackling Violence at Home the Strategy for Addressing Domestic Violence and Abuse in Northern Ireland .

Community Foundation for Northern Ireland - CFNI recommends that promoting positive action should be an essential component of any strategy addressing gender equality. Equality of opportunity must also include equality of outcome.

Communist Party of Ireland - Northern Area Committee - Girl's only projects for engineering and other non-traditional subjects;no reference is made to the 2,000 women who have to travel to England each year in order to get an abortion; creche facilities in all Further Education colleges; pensions and poverty are associated....; ..public transport concessions..;women and men should not be penalised if they retire early;

Council for Catholic Maintained Schools - . broad support for this approach .. The objective of providing protection needs further elaboration.

Department of Education - Within this [education], DE may - subject to the views of other officials - wish to flag up the long-standing inequalities in terms of attainment between boys and girls (boys do worse) as an area for early action.

Down Lisburn Trust - The Trust considers that the inclusion of the Action Plan at this stage would have considerably enhanced the document. The absence of a clear Action Plan, highlighting targets does undermine this document. The Trust would appreciate being consulted on the Action Plan when it is produced. It may enhance the document to amalgamate pillars one and two therefore the actions have four clear areas in the pillars and principals format. The document generally could benefit from the use of less technical language..

[Additionally re key action areas - employment opportunities should include promotion; and recommend including specifically pregnancy, maternity/paternity and employment.]

EHSSB - The action areas identified are relevant for priority action . [The Strategic Goal] Needs to be linked to the pillars of action and specific action specified by relevant departments, with opportunities for departments to examine cross-departmental issues. All civil servant departments are responsible for promoting gender equality both with internal and external policies. Gender Equality Action Plans require issues to be addressed in respect of monitoring issues and monitoring information .

[Additionally re key action areas -suggested pension rights and partnership rights as requiring attention; issues of homelessness, one of the major factors causing extreme social exclusion, also needs to be reinforced in this strategy and actions and targets set to address the issues.]

Equality Commission for Northern Ireland - ... positive action must be an essential component of the strategy alongside equality mainstreaming. ... concerned that the present strategy will not fundamentally address gender inequality. .. concerned that the concept of choice within the document is not qualified by the structural context of women's lives. We recommend that the developing strategy is simpler and less complex but crucially that it is backed up by a detailed action plan which follows through on international commitments [Beijing etc]concerned that the overall strategy lacks specific actions to tackle gender inequalities. It fails to provide an analysis of gender inequalities within existing social, and economic structures. A more simplified and coherent strategy would be more beneficial. [Para 47 of ECNI's submission refers] The reader is left with a series of intentions, plans etc but without any effective measures of ensuring that gender equality will be achieved. ...concerned that the key action areas at 2.4 do not sit with the strategic objectives of gender equality in economic, socio/cultural or civic life (chapter 6). It is unlikely, that at a strategic level, domestic violence will feature as a priority for an over arching race strategy. It is clearly a gender based issue and therefore needs to be addressed in the action plan flowing from the Gender Strategy. ... concerned that the focus of this strategy is on gender mainstreaming only with no apparent attempt to complement this with positive action measures... Employers (and service providers and others) [can] introduce, on a voluntary basis, positive measures to include previously disadvantaged groups in employment and the receipt of services without the danger of an indirect or a direct discrimination action being taken against them.

[Additionally re key action areas - We would welcome further information on how reserved matters will be taken forwards within the context of this strategy.]

Falls Women's Centre/Ionad Mhná Na bhFál - ... the proposal that the impact of domestic violence on minority ethnic women will be dealt with separately indicates a complete failure to understand the gender nature of domestic violence. The use of the term 'economically inactive' to describe women who work in the home ... continues to degrade their contribution to society. We propose the alternative term 'actively unpaid'.

Family Planning Association - ...they (women) are significantly underrepresented in all but the lower echelons of decision making, public and political life.

INGAGE - Inter-Agency Group - ... there is a real lack of understanding of the scope of legislation and what is permissible under existing legislation in relation to positive action.

[Additionally re key action areas - women's access to benefits in their own right; preventative health.]

Institute of Conflict Resolution - refer to the issue of women and violence being done in a limited manner that largely reduces the relationship to issues of sexual and domestic violence and of women as victims. The Institute think this is an unduly narrow focus and ignores the growing evidence of women's active agency in regards to forms of violence and their growing numbers in the criminal justice system.

The Men's Project - this list [key action areas] is very long . some of the issues should be grouped under thematic headings. ..would also raise additional key equality issues such as morbidity in males; the male suicide rate; the declining fortunes of males in education; the circumcision of young boys as a first line of defence against urinary infections; the reproductive rights that fathers have in law; men who are the victims of domestic violence; and the father's role in the lives of their children following the ending of a relationship.

NASUWT - The development, implementation and review of the strategy must not be permitted to increase the bureaucratic burdens on schools and colleges. NASUWT would want to see reference to the conduct of gender impact assessments in respect of all departmental policies and strategies.

[Re key action areas - the gender bias in entry to the teaching profession. .. all schools to have an equal opportunities policy which covers all staff and pupils.

- workforce development strategies within occupational sectors which address the need for improved work/life balance, training and development, coherent career pathways and improved employment and progression routes for women and men;
- mandatory equal pay audits in the public and private sectors ...;
- pay disparity between gender-segregated occupations;
- raise pay levels of occupations traditionally associated with 'women's work';
- equality proof pay and rewards systems;
- require employers to provide support for workforce training and apprenticeships, including investment in positive action training to tackle the problems of occupational segregation and under-representation;
- support the work of trades unions representing women and men in the workforce

NIC ICTU - Difficult to make a full response to this question without sight of a timetabled action plan for taking forward work to promote gender equality. NICICTU would welcome clear timetables for the achievement of defined targets. We would be pleased to comment on a timetable for action following production of the envisaged Gender Equality Action Plan. consideration be given to the use of the full range of positive action measures that could be adopted to advance gender equality. For example, the anticipated pillars of action in this Strategy (p. 45) include 'removing barriers to equality of opportunity' and it would be helpful to consider what positive action measures could be adopted to facilitate this objective. We would welcome the inclusion of a commitment to the promotion of de facto equality and the use of appropriate positive action measures. Congress would welcome particulars as to both the timeframe for the production of the proposed Gender Equality Action Plan and the substance of same.

Congress would be happy to comment on this matter [possible impact on equality categories within Section 75] following production of an action programme for consultation against which proposals for action can be assessed for their specific impact on Section 75 groups.

[Additionally re key action areas - health matters should include sexual and reproductive health and mental health. In terms of "family diversity and parenting issues" NICICTU would welcome clarification of family diversity, especially in terms of lone parents. NIC ICTU would also welcome clarification of rural women issues. Also how policies such as pension policy and other reserved matters are to be taken forward within the framework of the strategy.]

NICVA - .. there are no targets, outcomes or timeframes, so how will progress be assessed?

[Additionally re key action areas - sexual and reproductive health and sex and relationships education.]

Northern Ireland Housing Executive: - ...the area of family diversity and parenting must either include issues relating to equality in parenting after family break-up or this should be a separate key action area.potential housing policy implications in relation to the allocation of suitable accommodation. These (pillars) are comprehensive and inclusive.

[On early action]:

- Homelessness
- Gender Based Violence
- Community Safety
- Work Life Balance
- Equal Parenting
- Vocational training in urban areas
- Needs of men/women in rural areas
- Housing need in rural areas.

Northern Ireland Women's European Platform (NIWEP) - The analysis of domestic violence in the document obscures the fact that women are considerably more likely than men to experience domestic violence. Policy and strategies need to fully recognise this... concerned . that the impact of violence on ethnic minority women will be within the remit of the Race Equality Strategy .. There should be clearly defined targets, which are time set] and indicators against which progress can be measured..

[Additionally re key action areas - on omissions from the strategy - sexual and reproductive health and sex education plus lack of specific measures to ensure that there is more equal distribution of labour within the home.]

Presbyterian Church in Ireland - Generally we would agree that these are the key action areas. The pillars cover the legislative, educational and attitudinal areas that all go hand-in-hand to make significant changes in gender equality.

[Additionally re key action areas - commented that "sport" is not mentioned in the key action areas.]

QUB - The key action areas identified appear to be comprehensive. The pillars of action appear to be comprehensive and appropriate in establishing structures and setting operational objectives and targets for action.

[Additionally commented that pay and employment opportunities appear to be the most important.]

Save the Children - While the 17 action areas may include children, these remain very adult focussed. We recommend that children and young people be consulted on the action areas and that child-specific action areas be developed.

South and East Belfast Trust - The Trust would recommend grouping items on the priority list [key action areas] and indicating some of these items as top priority. Work on stereotypical attitudes and prejudice should be one of these. We suggest that some of these action areas are grouped together e.g. tackling poverty, education and employment and that short, medium and long term goals are set to ensure some early successes. The fact that there are four principles for government action and five pillars of action is confusing. We suggest some re-working to make it more easily understood. For example pillars one and two could become one pillar:

Removing barriers to equality of opportunity by increasing awareness and understanding of gender inequality and differences. It will be important for lower-level performance indicators and targets for actions to be set and to identify benchmarks by which actions can be measured. No date is given for the publication of the action plan, which we feel, should be launched at the same time as the strategy.

[Additionally re key action areas - the Trust would add "information gathering" to the list as well as "marital status" and "dependants" (though admitting that this will be partly but not wholly covered in parenting issues as it excludes care of elderly relatives and others{?!?}) The Trust would prioritise poverty, domestic violence, training and job opportunities.]

Social Economy Network - ...SEN is also concerned about the lack of targets to redress gender imbalance. The SEN considers that measurement of goals against existing baselines must be a key strand of the strategy. The strategic objectives and the actions for government departments require a baseline measurement.

Soroptimist International of Northern Ireland - The action areas are vital but we reserve judgement until the Gender Equality Action Planning stage

Training for Women Network - Equality of outcome often requires positive or affirmative action to take place, yet there is no indication that this is part of the strategy.document is not very specific about intended action points for addressing targets in the various areas of disadvantage identified.. The lack of defined targets in the various areas of disadvantage identified, even with reference to government commitments to national and international strategies and treaties, makes the document ambiguous and without potency.

It is recommended that action points are more specific and have identified targets for progress.

UNISON - [On Domestic Violence] - the Gender Strategy contains bland pledges without clear targets and indicators requires recommendations that raise awareness of domestic violence and initiate actions to deal with it.

[Additionally re key action areas - careers guidance; women's health and safety at work; benefit rates;]

University of Ulster

Access to employment/economic dependence - improvement here is inter-related with childcare, economic infrastructure, access to public transport etc.

Caring role - Government should develop an awareness campaign and strategy valuing childcare and emphasising that it is not an exclusively female role.

Gender pay gap - there should be gender pay audits in as many sectors as possible, at least every five years with goals and targets for affirmative action linked to the results.

Enterprise creation/entrepreneurship - more research needed into the uptake of enterprise loans by males and females in NI.

Pensions - agreement that the Government should develop a strategy to deal specifically with the inequality concerning part-time, low-paid workers (mainly women) being less likely to have pension provision.

Education and lifelong learning - introduction of DEL's Variable Deferred Fees..negative impact on the numbers of male and female students who are able to fund their studies in NI and will impact negatively on the policy of access to lifelong learning in general.

Work-life balance/stereotypes - key issues include: expectations linked with women and men's roles; staffing implications and workload; and reluctance by female workers to admit that time off is due to child's illness, hospital appointments etc.

Rural communities/homelessness - ... view transport as the key issue in rural communities. The strategy should also consider the "hidden homeless" (people living with a friend due to poverty).....

Social welfare/poverty/health - Poverty is linked to the action area of pension provision, particularly for women. ..poverty and social inclusion could be addressed more fully by strengthening its relationship with Section 75 processes. There is a need for a gender driven health strategy.....different types of illnesses prevalent in males and females.

Crime/gender related violence - .women, the elderly, members of the gay community and ethnic minorities.pparticularly vulnerable to crime.....this should be taken into account when developing government-led community safety campaigns. There needs to be increased government support and awareness raising in elation to domestic violence in NI.

Representation in public life - Government should liaise with E&LBs to resource and develop career planning in schools. Representation in public life is linked to caring responsibilities and the ability to travel. Current review of public administration provides opportunity for government to address barriers that may prevent women from progressing within their organisations and develop strategies accordingly.

The final strategy should include a detailed action plan that highlights areas of priority, is time bound, provides clear information on the financial and other resources that will be used and what departments/partnerships will deliver the targets.

Women's Criminal Justice Network - [key action areas] the priorities were right but we were unclear as to how the priorities will be prioritised. It may be that there are too many priority areas and dilution across these 17 action areas may of itself lead to dilution in focus and lack of achievement.add that within Crime and Community safety, which we believe should be termed 'Crime, Justice and Community Safety' , issues such as sentencing, representation, custodial patterns, outcome patterns, arrest/custody and victims within this priority area need to be addressed. The pillars, whilst useful may confuse, as there is a degree of overlap between the pillars, goals and principles. It may be easier to read if the distinction between these areas was clearer.

Women Educating for Transformation (WEFT) - What is missing from this strategy is:

- A clear analysis of discrimination against women
- A programme of recommended actions action to achieve equality for women
- Time bound targets
- Allocated resources

Women's Resource and Development Agency and the Rural Women's Networks - ...this Strategy needs to be clear and coherent... Precise aims and objectives need to be formulated and definite timeframes put in place so that proper evaluation and monitoring can take place. Labeling women who 'choose' to work within the home as 'economically inactive' is offensive and undermines the contribution.... supporting "systems for female and male victims of such violence" neutralises the gender aspect of domestic violence and does not reflect the reality of the situation. The gender neutral approach taken by this strategy has the potential to damage work being carried out by organisations.. Despite placing importance on the process of mainstreaming as a means of achieving equality of opportunity the Strategy ignores the use of positive action measures.... Where necessary positive action measures will need to be adopted. WRDA propose the introduction of a dual approach whereby Gender Mainstreaming is complemented by positive action measures designed to redress the historic disadvantages experienced by women and improve the under-representation of women in all areas of public and political life. Structures need to be put in place to ensure that our Education System has an active role to play in promoting gender equality. The Strategy refers to "measurable improvements" yet does not provide any specific targets or actions. ...in order for subsequent monitoring and evaluation to be carried out effectively.

Women's Support Network - creating the means whereby equality of outcome rather than a meaningless 'equality of opportunity' can be measured. the strategy as it stands is overly complicated and difficult to grasp. A simplified strategy, with clear targets and with resources specified to meet those targets, would have a better chance....and more chance of being implemented and monitored. A robust anti-poverty strategy had to be incorporated. The term 'economically inactive' was rejected as a patriarchal concept...it discounted the economic worth of their contribution... .. society needed to put more value on the work that women do and that boys needed to be taught to respect the work of women. .. much of the problem lies with the women's

economic dependency on men. ... believe that suicide is an entirely separate issue... deserves its own policy response.

[On "Representation in public life and in senior decision-making roles"]: ..there must be positive action to ensure future gender parity. ...important that the strategy works to ensure that women are able to participate on equal terms with men at all levels of public and political life.

[Additionally re key action areas - tax credits and the loss of benefits if working; housing shortages in North and west Belfast; emotional well-being; teenage boys (in terms of ".. boys aged over 14, who are unable to accompany their mothers to Women's Aid refuges").

YouthAction Northern Ireland - .. the document [refers to] action plans which will follow... .. impossible to assess the impact and effectiveness of a strategy without actions being explicitly stated. The impact of violence, both as perpetrators and victims, on young men's lives should be addressed within the document. This could be addressed as a sub heading under the heading of Gender- Related violence and abuse. [Additionally re key action areas - Young men's health; .. trend that young men aren't performing in the formal education system needs to be addressed .. It is also difficult for young men to undertake what would be deemed 'traditional' female jobs.] A more strategic approach to working with young men must be developed.