



National Women's  
Council of Ireland  
Comhairle Náisiúnta  
na mBan in Éirinn

**National Women's Council of Ireland**  
**Pre-Budget Submission 2019**

**INVESTING IN WOMENS' FUTURES**

## NWCi BUDGET PRIORITIES

<b>The Gender Equality Framework</b>	<b>Department</b>
Publish an Equality Impact Statement with Budget 2019 Restore funding to the community women's community sector Increase Funding to NWCi	DPER DJE DJE
<b>Tackle Economic Vulnerability and Poverty</b>	
Restore income disregards to all categories of lone parents on OFP JST and JSA Allow lone parents to receive both the JST and WFP Increased flexibility on the 19.5 hour WFP threshold Ensure lone parents on JST have access to SUSI grants	DEASP
<b>Deliver Homes &amp; Housing</b>	
Increase social housing capital budgets Provide resources to gender proof all homeless and social housing strategies and budgets Introduce a minimum 5 year tenant protection-lease length Bring housing assistance supports fully into line with market rents	DHPLG
<b>Value Care</b>	
Increase the maximum 'standard hours subsidy' to 20-hours of childcare per week Increase the maximum universal subsidy €30 per week for a child in full-time care Develop a national pay scale for ECEC workforce  Increase Home Support Hours by at least 25% Restore Carers Allowance and Carers Benefit to 2009 rates  Resource 4 months' paid parental leave & paid paternity leave to 1 month Resource 6 paid days of carers' leave	DYCA  DOH DEASP  DEASP
<b>Support gender sensitive pension reform</b>	
Initiate the introduction of universal state pension End the marginal rate tax reliefs on private pensions Deliver the transition to a homemakers credit/care Establish a budget line to restore the 2012 changes	DEASP
<b>Develop Women's Health Services</b>	
Resource the Women's Health Action Plan Resource the provision of abortion care  Resource supports for women and families impacted by Cervical Check controversy Allocate resources to restore confidence in system amongst women  Establish the National Health Fund Implement transitional funding arrangements for Sláintecare	DOH, HSE
<b>Eliminate Violence Against Women</b>	
Ring fence funding for specialised support services Provide resources for at least 1 refuge place per 10,000 of population  Ringfence resources for An Garda Síochána (AGS) to complete nationwide DPSUs cover  Ring-fence €1 million over three years to conduct the SAVI 2 study of sexual violence  Resource DEASP to legislate and introduce 5 Days paid leave for survivors VAW violence	DYCA  DJE  DJE, DOH, DYCA  DEASP

## Introduction

Established in 1973, the National Women's Council of Ireland (NWCI) is the leading national women's membership organisation in Ireland. NWCI seeks full equality between men and women and we draw our mandate from a membership of over 180 groups and organisations across a diversity of backgrounds, sectors and locations. We also have a growing, committed individual membership.

This submission is one part of NWCI's pre-budget process which includes a substantive submission to the Department of Employment and Social Protection (DEASP) and a set of letters to Ministers for Health, Justice and Equality, Rural and Community Development, and Housing Planning and Local Government.

NWCI is committed to contributing to the ongoing process of budgetary reform and to creating a shared and gender sensitive understanding of a just and equitable social and economic model for Ireland that is resilient and inclusive. We actively support and work with government to implement the aims of the National Strategy for Women and Girls (NSWG) and to develop an integrated and focussed programme of gender aware and gender proofed investment. It is important this vision is also aligned to UN sustainable Development Goals (SDG) and the UN Convention for the Elimination of Discrimination against Women (CEDAW) recommendations to Ireland, as well as other UN convention recommendations.

## Economic Overview

NWCI believes that a core economic priority must be increasing our investment in public services. We are concerned that the Government will not spend €900 million this year that it would be entitled to under the EU fiscal rules, and intends to continue this trend through to 2021. Whilst we concur it is not economically prudent to meet all budget demands, there is clear evidence that preventative social investment will create future savings and, crucially, reduce present injustice and inequality.

Choosing to use windfall receipts to reduce public debt and /or the establishment of a rainy day fund are positioned as *the* acceptable objectives, however NWCI believes that immediate investment in reducing the burden of poverty, deprivation and inequalities will have more positive pro-social long term impacts. Lack of investment will inevitably keep, or transfer back, personal, health and community care needs to the unpaid, undervalued and often invisible labour of women.

We welcome the increase in the level of employment, closest to its highest level ever, however we are not approaching what could reasonably be called 'full employment' as women's participation rates remain low and many women are underemployed. A gendered analysis of full employment is necessary to draw attention to the reality of the gap between male and female market participation<sup>1</sup>. Women who are unattached or marginally attached to the labour market, including those in voluntary or involuntary underemployment, need to be specific targets of any national productivity strategy. Our submission to DEASP addresses this gender inequality and makes recommendations to address the consequences, please see NWCI DEASP submission for further details.

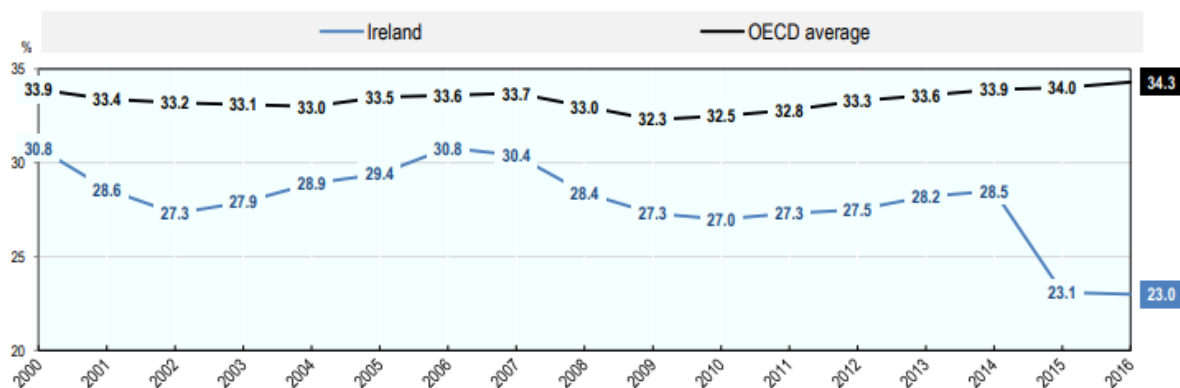
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<sup>1</sup> Please see NWCI DEASP submission for analysis

## The Gender Equality Framework

### Taxation

- NWCI welcomes the ongoing commitment to maintain at least a 2:1 split between public spending increases and tax reductions. There is no need for tax reductions as Ireland already has a low tax-take as a proportion of national income, continuing to be below the EU average.<sup>2</sup> Budget 2019 should focus instead on increasing taxation, in a fair and equitable manner, towards the EU average and utilising all available resources to deliver the public services and social infrastructure Irish people aspire to having.



**Tax-to-GDP ratio compared to the OECD**

- NWCI does not concur with governments stated objective of increasing the threshold at which people enter the high tax rate. Women predominate in low paid, part-time jobs and take time out of work to undertake unpaid care responsibilities; therefor they benefit substantially less from cuts to income tax and especially to reforms aimed at higher rate tax payers.

### NWCI Recommends

NWCI believes the tax base can be broadened in a sustainable and gender sensitive way by:

- Measures related to corporate tax base**

Aware of the general tax harmonisation agenda in both the EU CCCTB process and the OCED Base Erosion and Profit sharing<sup>3</sup>, NWCI believes that Ireland needs to refocus the role low corporate rates play in Ireland's overall economic strategy.

Measures should be introduced for a progressive overall increase in corporate taxes towards the effective EU average.

- End standard rating of pension related tax reliefs.**

The State spends approximately €2.39 billion per annum in private pension tax relief. In 2014, 72% of pension tax relief went to the top 20% of earners and 5% of the population are getting 50% of the tax relief<sup>4</sup>. This current tax based incentive system for pension savings is regressive. As women tend to

<sup>2</sup> <https://www.oecd.org/tax/revenue-statistics-ireland.pdf>

<sup>3</sup> <https://www.oxfamireland.org/sites/default/files/upload/pdfs/mantras-myths-final.pdf>

<sup>4</sup> Collins, M.L. & Hughes, G. Supporting Pensions Contributions through the tax system. IEA Conference 2017

be lower earners, these tax reliefs also widen rather than narrow the gender pension gap. The public monies saved should be reinvested in first tier state pensions and a universal pension.

- **Reduction in and exemptions from VAT**

Women are worst affected by consumer taxes, with worst impacts on the poorest. In Budget 2012 the increase from 21% to 23% resulted in the poorest decile paying 30.64% of overall income in VAT compared to only 5.7% for the highest decile<sup>5</sup>. Decreases and /or other changes in VAT must be assessed for a progressive impact on the most vulnerable.

There should be a restoration of the hospitality VAT rate to 13.5% and revenue raised from this measure should be used to offset regressive VAT impacts on the most vulnerable.

## **Gender Budgeting**

Government has committed to a process of gender budgeting which was subsequently advanced, in collaboration with the NWCI, over the 2016-2018 period. An Equality Impact Statement published alongside Budget 2019 should be the next step in this process. It should include a comprehensive gender analysis of the already committed €2.6 billion, budget day expenditures and the overall fiscal strategy.

As recommended by the Budgetary Oversight Committee, the Statement should set out broad and ambitious strategic gender equality goals, utilising the National Strategy for Women & Girls (NS WG). These should be linked to the gender equality performance indicators, objectives and targets chosen by Government Departments for inclusion in the Equality Budgeting Initiative. This would advance the integration of gender (and progressively other equality budgeting processes) into the annual budget process and the delivery of public services.

NWCI fully supports the recommendation of the Committee that consideration be given to placing equality budgeting on a statutory basis in Ireland and Budget 2019 is an opportunity to affirm commitment to this being progressively achieved

## **NWCI Recommends**

- Dept. of Finance & Public Expenditure and Dept. of Justice & Equality establish a training fund for resources and staffing to support
  - cross dept. training on gender budgeting implementation
  - development of disaggregated data collection and analysis

## **Women's Leadership and Participation**

The women's sector in Ireland, through women's community development & education, delivers a significant intervention to the challenges of social exclusion, income poverty and social disinvestment. They provide advice and counselling, access points for education and training, and they help women experiencing domestic violence. Local women's organisations enable women to participate at all levels of public life and support for women's voices at civil society level is an essential aspect of participatory democracy and citizenship.

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<sup>5</sup> [https://www.nerinstitute.net/download/pdf/dist\\_effects\\_of\\_recent\\_vat\\_neri\\_wp\\_19.pdf](https://www.nerinstitute.net/download/pdf/dist_effects_of_recent_vat_neri_wp_19.pdf)

From 2008 - 2014, there was a reduction in government spending on the community and voluntary sector from 53.4B to 49.6B. In 2008-15 there was a 31% decrease in workers in the Community and Voluntary sector. Many areas were halved including voluntary social housing and local and community development and work with migrants.

The redevelopment and sustainability of women's community-based anti-poverty sector must be addressed in 2019. At the national level there should be increased funding for NWCI, recognised by Government as a key body advocating on women's concerns and perspectives, to continue to advance women's equality.

### **NWCI Recommends**

- **Increase funding to NWCI to support the achievement of full equality for women**
- **Restore funding to the community women's community sector to pre 2009 level**

### **Tackle Economic Vulnerability and Poverty**

NWCI has made a separate submission to Department of Employment and Social Protection (DEASP) focused on recommendations to enhance women's economic independence through labour market participation and the role of the social welfare income support system to reduce income poverty and inequality. The following section outlines the main points of that submission.

The Indecon 2017<sup>6</sup> and ESRI 2018<sup>7</sup> have confirmed that lone parents in paid work are penalised by changes to lone parent social welfare supports. These changes have preceded the establishment of fully resourced and nationally available affordable childcare and have pushed many lone parents out of the paid labour market or into in-work poverty.

2016 SILC data confirms that lone parent households, 90% of whom are women, with one or more children aged under 18, had consistent poverty rates of 24.6%, and the highest deprivation rates, at 50.1%. Persistent reductions in the income disregard for lone parents receiving the One Family Payment (OFP) have resulted in significant income losses. Gradual reductions to the OFP age threshold have moved significant numbers of lone parents onto the replacement unconditional Jobseekers Transition Payment (JST). Though lone parents in receipt of the JST are not required to seek full-time work and more flexible part-time work patterns are accommodated, those who do work are not entitled to the Working Family Payment, unlike those in receipt of the OFP.

The Indecon report highlighted net exchequer savings of €45.08m from the OFP reforms, but noted that many of those who lost OFP remain unemployed or are in low paid or part-time employment. The savings generated should be utilised in a programme of supports for the 48% of lone parents who have not increased earnings since the reforms.

As recommended by the Joint Committee on Social Protection<sup>8</sup> there is an urgent need to establish a Statutory Maintenance Authority, to reduce the burden on women to litigate for child maintenance

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<sup>6</sup> Independent Review of the Amendments to the One-parent Family Payment since January 2012

<sup>7</sup> Lone-parent incomes and work incentives

<sup>8</sup> June 2017 Joint Committee on Social Protection

order; there is a significant rate of non-compliance with child maintenance orders, significant delays in the courts system and a high cost involved in engaging a litigious route.

## NWCI Recommends

- **Make reducing deprivation and child poverty levels in one parent families a priority in Budget 2019**
  - Restore income disregards to all categories of lone parents on OFP and JST to €161pw
  - Increase the income disregards for lone parents on OFP and JST to support take up of increased working hours
  - Allow lone parents to receive both the Jobseekers Transition Payment and Working Family Payment
  - Increased flexibility on the 19.5 hour WFP threshold to enable lone parents to transition to employment through low part hours, seasonal and other forms of 'if and when' contractual employment
  - Ensure lone parents on JST have access to SUSI grants
  - Recognise the additional costs (and additional vulnerability to lone parent family poverty) associated with the older child and introduce an increased QCI rate for over 12's
- **Establish and resource a Statutory Maintenance Authority**

## Deliver Homes & Housing

A feminisation of homelessness has occurred in the current housing crisis and Irish homeless research and policy analysis has failed to engage with the distinct experiences women's homelessness and issues. In the Dublin region women comprise 47% of the total adult homeless population, compared to between 20% and 33% across Europe<sup>9</sup>. In the past year, family homelessness in Ireland increased by 37%. 67% of these families are lone parent families, and 86% are headed by women, the vast majority having been made homeless from the private rental sector<sup>10</sup>.

There is a clear link between material vulnerability and risk of homelessness. Female headed consistent poverty increased from 13% in 2010 to 26% in 2015, this compares to the general increase from 6.3% to 8.7% in the same period. Private rental housing markets are unable to provide the level of security of tenure needed by these female headed low income families, increasing the quantity of quality social housing stock is the only solution to such housing vulnerability.

Rebuilding Ireland has no formal gendered analysis of homelessness policy, no gendered disaggregation of homeless data or social housing waiting lists, and no gender proofing of policy or practice<sup>11</sup>. There has been not been sufficient recognition of domestic violence or inclusion of 'women in refuges' within the homeless count, or those residing in direct provision centres.

## NWCI Recommends

- **Increase social and affordable housing**

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<sup>9</sup> Mayock P and Bretherton J 2017. Women's Homelessness in Europe

<sup>10</sup> Hearne R and Murphy M 2017. Investing in the right to a home, Houses HAP and Hubs

<sup>11</sup> Murphy M 2017 Advancing human rights and equality proofing in Ireland

- Increase social housing capital budgets across local authorities and approved housing bodies
- Review tax measures to disincentivise land hoarding
- **Increase security of tenure**
  - Bring housing assistance supports fully into line with market rents
  - Amend Part 4 Section 34 of the Private Rental Tenancies Act to ensure buy-to-let landlords cannot utilise exemptions
  - Introduce a minimum 5 year tenant protection/lease length of security for homeless HAP Tenancies
- **Provide resources to gender proof all homeless and social housing strategies and budgets**
  - Establish gender sensitive support services for women living in homelessness
  - Resource the development of a homeless healthcare strategy

## Value Care work and Support women's economic independence

Although care work is essential to the common good and performs vital social and economic functions, it is neither prioritised nor sufficiently supported. Equality between women and men in employment and in the public sphere depends very much on equality in the private sphere, especially with regards to equal sharing of care-work between women and men. Research has demonstrated how work life balance initiatives are mutually beneficial to workers and their families, enterprises and wider society.

However, Ireland's care policies and services for children, dependents and older people, and statutory supports including maternity, paternity and parental leave provisions lags behind many of our EU partners. Women's labour force participation rates have moved closer to men's over the past decades, however women continue to provide the majority of unpaid care hours. 98% of those looking after the home/family were women in 2016<sup>12</sup>.

**In anticipation of the Referendum to Repeal Article 41.2 "The Women in the Home" article, NWCI is calling for resources to be committed to a Citizens Assembly process to agree our national vision for A Caring Ireland. A minimum budget of €1million should be allocated for this process.**

## Quality Childcare and Early Childhood Education

Childcare remains the single most significant barrier to women's equal participation in all aspects of society, including employment. Take up of part-time and full-time employment by women is directly linked to the lack of affordable and quality childcare. The provision of high quality affordable early years and childcare (ECEC) is key to closing the gender pay gap. The link between quality ECEC and reducing disadvantage and poverty has also been well established. Therefore delays in rolling out the Affordable Childcare Scheme (ACS) and the insufficient budget allocations it has received to date is of grave concern to NWCI and its members.

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<sup>12</sup> CSO 2017 Women and Men in Ireland



The 12-month review of the ACS, should be gender & poverty proofed to ensure the most disadvantaged children and families are not penalised in their access to quality childcare by a disproportionate focus on parental labour market activation.

NWCI also notes the Working Group on Reforms and Supports for Childminding Sector Report and supports its recommendations for the regulation of childminding. This will increase options and facilitate choice for women, particularly those who need more flexibility than can be provided by centre based providers

The ECEC sector has a significant sustainability crisis and is reliant on low wage and precarious employment contracts, including a dependence on summer month social welfare supports. As the sector is predominantly staffed by women this has the unfortunate consequence of perpetuating negative gendered labour patterns. The NWCI notes that the DYCA commissioned Crowe Horwath report on the cost of providing quality childcare in community and private setting is now overdue and calls for it to be published urgently.

## NWCI Recommends

- **Incrementally increase investment in early years to bring overall expenditure in line with the UNICEF recommendation of 1% of GDP**
- **Develop and resource a nationally agreed pay scale for the early years workforce**
- **Identify a model for future capping of fees**
- **Establish an initial budget line of €2million for the recommendations of the Childminding Working Group Reports**
- **Establish an initial budget line of €2 million for the recommendations in the Action Plan on School Age Childcare**
- **Establish an initial budget of €3.5 million for a dedicated sustainability fund to support services to continue provision of childcare for under 3s**
- **Increase the maximum 'standard hours subsidy' to 20-hours of childcare per week.**
- **Increase the maximum universal subsidy for children before the start of ECCE to €30 per week for a child in full-time care in 2019**

## Family Care Provision

Women undertake the majority of unpaid care work in society. Family carers provide essential supports in an inadequate health and social care system. Carers should have certainty that basic supports will be in place to maintain their own health, to obtain respite support and to have access to financial support while they undertake care.

Women and their families are increasingly reliant on private homecare as they seek to balance caring and work. There has been a significant privatisation of homecare to a largely unregulated home care industry. An inevitable outcome of the lack of regulation is a sector with high fees, varied quality and standards of homecare provision, and poor terms and conditions for workers. Domestic and personal care workers are often migrant women workers and women of colour, subject to the most extreme instances of precarious work and exploitation. We must not become dependent on the exploitation of some of the most vulnerable women workers to meet personal, familial and community care needs.

The Department of Health's plan to establish a statutory homecare scheme by 2021 is welcome, but interim measures are urgently required

### **NWCI Recommends**

- **Increase investment in the provision of care**
  - Home Support Hours should be increased by at least 25%
- **Restore Carers Allowance and Carers Benefit to 2009 rates (€220.50/€221)**
- **Increase Carer payment study hours to 18.5 hours**
- **Increase earnings disregard for Carers Allowance so that average industrial incomes qualify**

### **Invest in work-life balance**

To achieve multiple national policy objectives, government must support workers with caring responsibilities to stay in work. Not only will this help tackle the gender pay & pension gap, it will also help organisations retain skilled workers in the face of high employment rates and low productivity.

There is a distinct failure of the social security system to recognise care work, a person is deemed to be new entrant if they have not contributed for the previous 2 years. Those that may wish to combine care-work with part-time waged work, predominantly women, find that they are not eligible for social welfare payments (ie Jobseekers Allowance), are not registered as unemployed and are therefore discriminated against in terms of welfare income and opportunities to participate in training programmes.

### **Parental Leave**

As 50% of workers in Ireland earned less than €34,000 in 2017 and almost one in five is classified as low paid, many households are unable to avail of unpaid parental leave. NWCI welcomed the government's commitment to 12 months paid parental leave and Budget 2019 should outline the progressive introduction of this leave.

### **Paternity Leave**

NWCI welcomed the introduction of two weeks paternity leave as an important step to recognising the role of fathers and the need to achieve a greater distribution of care between women and men. NWCI calls for a progressive increase in the period of paid paternity leave would allow more fathers to care for their young children and push this responsibility out of the domain of 'women's work' for good.

### **Carers Leave**

In Ireland, there is an entitlement to full-time' carer's leave, rather than an annual allocation of days as per the proposed EU Directive on Work-Life Balance.

### **NWCI Recommends**

- **Allocate resources for 4 months' paid parental leave that is non-transferable between partners, commencing after maternity leave**
- **Allocate resources for introduction of 6 paid days of carers' leave**

- **Allocate resources to extend paid paternity leave to 1 month**
- **Establish commitment to progressively increase all existing and future family leave entitlements to minimum payment of 66% of normal earnings<sup>13</sup>**

## Support gender sensitive pension reform

Gender sensitive pension reform is a priority for NWCI and our members and we are participating in all fora on the 'Roadmap for Pensions Reform 2018-2023'. Ireland's Gender Pension Gap stands at 26% and the NSWG identified closing that gap as a priority.

NWCI note the aspiration in departmental consultation documents that work patterns will have changed sufficiently in the future that the current gender pension gap will be reduced. However, based on current social patterns there will be an ongoing legacy of the marriage bar, a social welfare system poorly designed to support individual entitlement or recognise care work, and a deepening gendered occupation segregation into precarious part time un-pensioned work. This will necessitate the state pension to mitigate persistent gendered income poverty and inequality in older age.

NWCI also notes the emphasis on increasing occupational, second tier pensions through the development of the auto-enrolment scheme. We are concerned that resources devoted to the development of this will be diverted from first tier pensions without a clear analysis of how this will impact women and workers in low-paid, part-time and precarious employment, predominantly also women. An auto-enrolment system based on a private pension model will discriminate against women who take time out of the workforce to care.

NWCI calls on the DEASP to undertake it's committed to gender impact assessment of all reforms.

## Universal State Pension

NWCI argues that a universal pension system which gives women equal access to comprehensive pension guarantee is that the best way to support equality in older age.

A significant proportion of the €2.39b currently spent on private tax relief, the majority of which goes to high earners and men, can be reinvested in first tier state pension. We note that this funding option is not considered to fund a universal pension in the DEASP 2018 Total Contributions Approach (TCA) consultation document. The additional €13.6 billion per annum is within the pension tax relief envelope and would deliver a considerable impact of the gender pension gaps.

NWCI reject the idea of substantial cuts on the rate of payment to fund a universal pension.

## Homemakers Credit

A key priority for Budget 2019 must be the delivery of a full Homemakers Credit or Care Credit and its retrospective application. Women must have direct individual access to the state pension which takes into account the important role women play in providing unpaid care in the families and in their communities.

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<sup>13</sup> European Commission definition of well-paid leave

Longer periods of caring than currently envisaged, must be recognised in the final design of the TCA to recognise carers of adults and children with disabilities who may require a life time of care. This practical recognition of the social and economic contributions of care should also serve as a Re-Entry credit, ensuring that those looking to re-enter the workforce.

## NWCI recommends

- **Initiate the introduction of universal state pension**  
-Beginning in 2019 and phased in over an agreed number of budgets
- **End the marginal rate tax reliefs on private pensions**
- **Resource a gender impact assessment (GIA) of the TCA**  
-Resource a GIA on projected increased in state pension age & subsequent pension reforms
- **Deliver the transition to a homemakers credit/care that actively recognises the contribution of care and also serves as a re-entry credit**
- **Backdate the homemakers scheme to 1973, when the marriage bar was lifted**
- **Ensure the TCA is limited to 30 years for the maximum pension**
- **Establish a budget line to restore the 2012 changes**

## Develop Women's Health Services

Women in Ireland have a higher life expectancy than men and carry a disproportionately larger burden of ill health later in their lives. Women have life experiences which have specific impacts on their health – less financial security; carrying the majority of work in the home; experiencing violence from their partner; be the victims of sexual assault; and experience anxiety and depression. Poor health is inextricably linked to poverty, and health inequalities are a major concern for NWCI. Currently, inequity in access to public services exacerbates women's health inequalities.

Budget 2019 must reflect both the need to restore years of health cuts *and* funding for the increase in demand. After two decades of rapid population growth, a decade of cutbacks in public provision of care and a consequent build-up of unmet need, the demand for care has given rise to the need for additional expenditure, capital investment and expanded staffing.

## Develop the Women's Health Action Plan

In partnership with the Dept. of Health and the HSE, NWCI is developing the framework to for the Women's Health Action Plan (WHAP) as committed to by the Minister for Health<sup>14</sup>. Budget 2019 must resourcing the WHAP development process to include scoping research; consultation process; development and publication. Future Budgets funding will be required for implementation.

## Reproductive Healthcare

The Sláintecare universal care package for women must include entitlement to maternity services, contraception, and infertility services. Additional resources must be available for GPs, women's healthcare providers and Obstetricians through the Maternity & Infant Scheme for the provision of abortion care.

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<sup>14</sup> Minister for Health, 21<sup>st</sup> June 2018, 'Women Making History - NWCI

## **Cervical Cancer**

In Budget 2019 resources must be given to address the consequences of the Cervical Check controversy. This includes the necessary resources to support the women and their families affected, funding for the holding of a statutory inquiry, implementation of the recommendations of the Scally inquiry and subsequent inquiries, and for measures to restore women's trust in screening services.

## **Resource universal health services -Implement Sláintecare**

Budget 2019 must establish a funding stream to support the move to single-tier health system, supported by multi-year budgeting increasing system capacity, expanding entitlements and reducing out-of-pocket payments. Sláintecare implementation must prioritise low-income and vulnerable groups including Traveller women, migrant women and women living in homelessness.

## **Focus on Women's Mental Health**

Women's mental health in Ireland needs urgent attention. Ireland has the highest rate for child suicide of girls in Europe. 16%, 11,000 pregnant women in Ireland are at probable risk of depression during their pregnancy.

## **NWCI Recommends**

- **Women's Health Action Plan**

- Allocate €100,000 for development by DOH, HSE & NWCI

- Commit to year-on-year funding for implementation of WHAP in subsequent budgets

- **Reproductive Healthcare**

- Allocate additional resources to the Maternity & Infant Scheme (or new funding mechanism if appropriate) for the provision of abortion care

- Ensure resources are available for any clinical training requirements

- Ensure resources are available for any infrastructure necessities

- Allocate €26m for the Maternity Strategy

- Resource access to free contraception

- Resource universal access to infertility services

- **Cervical cancer**

- Resource supports for women and families impacted by Cervical Check controversy:

- Counselling Supports

- Increased access to medication and treatments

- Care packages for families

- Ensure funding will be available to implement the recommendations of state inquiries

- Including possible reorganisation of National Cervical Screening Programme

- Allocate resources to restore confidence in system amongst women:

- Increased promotion of national screening

- Increased Education & Out-reach services

- Gender neutral provision of the HPV vaccine.

- **Sláintecare**

- Establish the National Health Fund

- Implement transitional funding arrangements

- **Women's Mental Health**

- Budget 2019 should allocate least 10% of the health budget to mental health
  - Develop women-centred community-based mental health services
  - Develop community based counselling services
  - Develop women-only in-patient mental health services

## **Eliminate Violence Against Women**

Ending violence against women is critical to achieving equality for women and ensuring women are safe and free to participate fully in society. NWCI welcomes the progress to ratifying the Council of Europe Convention on Violence Against Women (Istanbul Convention) and the significant legislative changes enhancing legal protections available to victims. However, the essential resourcing of frontline services, the funding of specialised services and the supports for the collection of data on the incidence of violence against women, remains inadequate.

### **Invest in frontline services**

Demand for frontline Violence Against Women (VAW) services is high and has continued to grow. However, only small increases were provided in State-allocated funding from €19.5 million in 2015 to €20.6 million in 2016<sup>15</sup> and €23.8 million in 2018<sup>16</sup>. Not only has funding to specialist services been cut, other services and systems that are vital to keep women safe and which are necessary to rebuild their lives also received less funding and therefore had to reduce services. Organisations in the women's sector, which have seen significant reductions in funding, continue to plug gaps in the statutory services for VAW.

### **Provide adequate refuge accommodation**

The Council of Europe recommends that there should be a target by member states of at least 1 refuge place per 10,000 of population. With a total of 21 women's shelters with 141 family places, Ireland is ranked 24<sup>th</sup> in Europe, only meeting one third of the minimum standards for refuge provision<sup>17</sup>.

### **Resource specialist Garda services**

The initial roll-out of the Divisional Garda Protective Services Units (DPSUs) is very welcome, although the pace of implementation is slow in order to reach a national roll out in 2019. It is also clear that there continues to be insufficient Garda personnel and supervision at district level to meet the demands of Domestic Violence incidences appropriately. The development, training and roll out of the Risk Assessment protocols process must be also be resourced in order to be implemented effectively

### **Fund our understanding of VAW**

Accurate and comparable national data is needed in order to assess prevalence of VAW. Ratification of the Istanbul Convention requires the establishment of a 'gold standard' of data collection and analysis by all agencies working in the area of domestic and sexual violence. Significant resources are required to achieve this standard, as demonstrated by the ongoing challenges to the national criminal

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<sup>15</sup> Parliamentary Question, Dept. Children and Youth Affairs, Child and Family Agency Services, 25<sup>th</sup> May 2016.

<sup>16</sup> Parliamentary Question – Dept. Children and Youth Affairs, Child and Family Agency Data, 13<sup>th</sup> June 2018.

<sup>17</sup> Women Against Violence Europe (WAVE) Country Report 2014

statistics in this area. As recommended by the Dept. Justice and Equality Budget 2019 must allocate resources to conduct a SAVI 2 report on the nature and extent of sexual violence in Ireland.

### **Ring-fence resources for mandatory VAW training**

Staff in all agencies that assist women experiencing domestic violence need to be trained to develop an understanding of the impact of abuse on women and children, the risk of the abuse continuing or escalating, the responses of perpetrators, and agencies that women can be referred to for support. Dedicated funding must be ring-fenced within the budgets of each statutory agency.

NWCI believes that specific attention should be paid to development and roll-out of training in trauma and in coercive control a new offence under the Domestic Violence Act 2018.

### **NWCI Recommends**

- **Ringfence funding to combat violence against women**

- Fund specialised support services

  - Free 24-hour helplines

  - Psychological and legal counselling

- Provide resources to achieve the Istanbul Convention target of at least 1 refuge place per 10,000 of population

- Ringfence resources for An Garda Síochána (AGS) to complete nationwide DPSUs cover

- Ringfence resources for AGS to establish model of Risk Assessment for domestic violence

- Increase funding to Tusla to meet additional requirements under the Domestic Violence Act 2018

- Allocate resources for improvement and long term re-development of data collection and information analysis services

  - **Ringfence €1 million over three years to conduct the SAVI 2 study of sexual violence**

  - **Provide funding for mandatory VAW training for statutory agencies**

    - Including trauma informed training in recognising and responding to coercive control crimes

  - **Support & Sustain the national Ending Sexual Harassment Violence and Harassment in Third level Education (ESHTE) Project**

  - **Resource DEASP to legislate and introduce 5 Days paid leave for survivors of sexual, domestic and gender-based violence**