



Federation Northern Ireland

## **RESPONSE TO**

### **Northern Ireland Office Community Safety Unit**

**Together. Stronger. Safer.**

### **Consultation on Community Safety in Northern Ireland**

Women's Aid Federation Northern Ireland  
129 University Street  
BELFAST BT7 1HP

Tel: 02890 249041

Fax: 02890 239296

General Email: [info@womensaidni.org](mailto:info@womensaidni.org)

Website: [www.womensaidni.org](http://www.womensaidni.org)

24 Hour Domestic Violence Helpline - 0800 917 1414

## Introduction

Women's Aid is the lead voluntary organisation in Northern Ireland addressing domestic violence and providing services for women and children. We recognise domestic violence as one form of violence against women. Women's Aid seeks to challenge attitudes and beliefs that perpetuate domestic violence and, through our work, promote healthy and non-abusive relationships.

Women's Aid services across Northern Ireland include:

- 12 refuges with 300 bed spaces, playrooms and facilities.
- 1102 women and 896 children sought refuge in 2007 - 2008
- 12 resource centres for women seeking information and support; group work and training.
- 24 Hour Domestic Violence Helpline 0800 917 1414
- Move-on houses for women and children leaving refuges.
- Floating Support for women staying at home.
- Training on domestic violence and related issues.
- Inter-agency work across Northern Ireland.
- Young Person's Development Project

The following response is based on consultation with Women's Aid Federation Northern Ireland and our ten local Women's Aid groups. The term Women's Aid refers to the Federation and the local groups.

Women's Aid welcomes the opportunity to comment upon *Together. Stronger. Safer.* A consultation paper on community safety in Northern Ireland

### 1. DOMESTIC VIOLENCE

Domestic violence is one form of violence against women;

- Domestic violence is a violation of Article 5 of the UN Universal Declaration of Human Rights – that “no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment”;
- Women are not passive victims of domestic violence. With support women have the capacity to cope with and survive the violence and abuse they experience.
- Domestic Violence is a crime. PSNI statistics for 2007/08 indicate that there were more recorded crimes with a domestic motivation (9,283) than the combined total of all the following crimes (9,254). These include all recorded sexual offences

(1,822), robbery (607), armed robbery (444), hijacking (92), theft or unauthorised taking of a motor vehicle (3,336), arson (2,244) dangerous driving (513), handling stolen goods (191) and offences under anti-terrorism legislation (5).

- PSNI Statistics for 07/08 indicate that they responded to a domestic incident every 23 minutes of every day of the year.
- There were 382 rapes in Northern Ireland in the period 2007/08, 38 attempted rapes and 317 indecent assaults on a female.\*
- Official sources (NISOSMC) estimate that up to 80% of sex crimes are not reported.
- The number of all recorded offences of murder in Northern Ireland in 07/08 total 25. Those classed as having a domestic motivation total 11. Therefore, 44% of all murders in Northern Ireland in 07/08 had a domestic motivation.
- The joint NIO, DHSSPS Strategy for tackling Domestic Violence and abuse in Northern Ireland, "Tackling Violence at Home" estimates that the cost of domestic violence in Northern Ireland, including the potential loss of economic output, could amount to £180 million each year.

\*(PSNI statistics 2007/08).

## **2. Core Work of Women's Aid**

The core work of Women's Aid in Northern Ireland, including the Federation and local Women's Aid groups, is:

- To provide refuge accommodation to women and their children.
- To provide a range of support services to enable women who are leaving a violent situation to rebuild their lives and the lives of their children.
- To educate and inform the public, media, courts, social services and other agencies of the impact and effects of domestic violence.
- To advise and support all relevant agencies in the development of Domestic Violence policies, protocols and service delivery.
- To work in partnership with all relevant agencies to ensure a joined up response to Domestic Violence.

## **Introduction:**

Women's Aid notes the statement contained within the Executive Summary that the current consultation document, "builds on the work of the first community safety strategy, *Creating a Safer Northern Ireland through Partnership*" (April, 2002) (Pg.4) The summary also outlines the nine key issues which were identified to be tackled by the first strategy including, "Offences against the individual, particularly domestic violence and sexual assault." (Pg.4) In this context, whilst welcoming the commitment outlined in the new consultation document, to continue to prioritise domestic violence, we would wish to preface our wider comments by expressing considerable disappointment that the new consultation document, "Together. Stronger. Safer.," appears to offer little specificity in terms of new initiatives or to expand substantively upon existing strategic objectives, in respect of domestic violence. This appears to Women's Aid, to be a serious omission and a missed opportunity, particularly as the strategy seeks to address priorities over a five year period.

## **Chapter 1: Community Safety – The Story So Far**

### **Comments:**

- In respect of the Regional Initiatives outlined on Pages 11-17, Women's Aid would wish to acknowledge some of the excellent and innovative work that has been undertaken in communities across Northern Ireland both in respect of domestic violence and the wider issue of community safety. Our organisation has engaged pro-actively with several of these initiatives and partnerships and continues to do so.
- The consultation document states that the programmes highlight the benefits to the community of partnership working between statutory, voluntary and community bodies and that, "Working this way, we can respond appropriately to the issues identified by local people and deliver sustainable solutions to local problems and regional priorities." (Pg.17) Whilst we agree with this sentiment, we are however concerned that the short-term nature of the funding provision for many of these projects, has resulted in a lack of sustainability. As a result, achievements cannot be built upon and in some cases, an expectation in respect of service provision has been created within communities, that cannot be met long-term. Similarly the existence and availability of some initiatives, such as the "Racism Ruins Lives" DVD, should be much more widely publicised to encourage participation and further innovation.

## **Chapter 2: Community Safety in the Future Community Safety Priorities for the Next 3-5 Years**

- 1. Creating safer neighbourhoods**
- 2. Focus on families and young people**
- 3. Building strong, confident communities**

### **2.1 Question:** *Are the 3 themes proposed the correct ones?(Pg.20)*

- Women's Aid considers that the three cross-cutting themes as outlined above are extremely general and broad in scope. In addition we would suggest a greater degree of linkage between the themes and the nine key issues outlined on page 4 of the document and originally identified in the first community safety strategy, "Creating a Safer Northern Ireland Through Partnership" (April, 2002).
- We are also concerned that whilst domestic violence is mentioned in the context of "Building strong, confident communities" it is not highlighted specifically under the proposals in respect of "Focus on families and young people," detailed on page 6 of the consultation document.
- Women's Aid would also advocate that violence against women should be highlighted in the context of all three stated priorities.
- It is also our view that tackling the underlying causes of crime, should itself be a cross-cutting theme.

### **Creating Safer Neighbourhoods**

#### **2.2 Question:** *Are the powers proposed appropriate?(Pg23)*

- In the context of acknowledging the very real anxiety, blight and suffering created in communities by persistent anti-social behaviour and noise nuisance, and the need to pro-actively address these issues; Women's Aid has a number of concerns regarding the powers and proposals as outlined on pages 21-26 of the consultation document.
- Any proposal to introduce fines for landlords of tenanted properties identified as a source of noise nuisance,(Pg.23) should be contingent upon a thorough investigation of the individual circumstances.
- Women's Aid is extremely alarmed by reported incidents of women having their tenancy agreements terminated as a result of "noise nuisance" consequent to incidents of domestic violence and abuse.

- Women's Aid notes the 2008 Concluding Observations of The United Nations Committee on the Rights of the Child (UNCRC) in respect of anti-social behaviour orders (ASBOs) and Dispersal Zones, "The committee is concerned at the restriction imposed on the freedom of movement and peaceful assembly of children by the anti-social behaviour orders (ASBOs)...and the introduction of the concept of "dispersed zones".<sup>1</sup>
- We are also concerned that "Dispersal Zones" (Pg.23) and the associated powers detailed, rather than addressing specific problems, may serve merely to expand or export them, by removing any perpetrator/s or potential perpetrator/s of anti-social behaviour from one area to another.
- Women's Aid is also of the view that the consequences of these proposed powers, may fall disproportionately on young people. Many of whom often congregate in groups of two or more, on the streets.
- There appears to be no consideration of the underlying reasons behind this behaviour or tendency and no recognition that in some instances young people may gather on the streets because their home environment has become intolerable due to circumstances such as domestic violence, abuse or alcoholism.
- In such circumstances they may fear or be reluctant to return home and refuse to comply with requests to disperse or to return home. As domestic violence and abuse is often perpetrated in a veil of secrecy, they may also refuse to reveal their reasons for non-compliance and give the impression of being merely uncooperative.
- Similarly those not engaged in or intending to engage in anti-social or disruptive behaviour, may feel aggrieved at being moved on. This could exacerbate volatile situations and lead to additional disturbances.
- In conjunction with the stipulation that, "Failure to follow the constable's directions would be a criminal offence," (Pg.42) it is the opinion of Women's Aid that there is a considerable risk of criminalising large numbers of young people unnecessarily.
- We also share the concerns expressed by the Children's Law Centre at the apparent blurring of civil and criminal law consequent to the proposals. Similarly that a child may be criminalised as a result of breaching an Order which he/she received for behaviour which may not have been characterised as criminal.

---

<sup>1</sup> Paragraph 34, CRC/C/GBR/CO/4

- One of the desired outcomes detailed on page 22 is, “a lower rate of perception of crime, with more people feeling safe in their neighbourhoods and town centres.” In attempting to address these perceptions, there is a strong possibility that dispersal zones may have the opposite effect and could serve to reinforce stereotypes and fears.
- Similarly the designation of an area as a “Dispersal Zone” could reinforce negative perceptions of the area and the community and ultimately lead to greater socio/economic deprivation for those living there.
- In endeavouring to counteract perceptions, as proposed, it would seem essential to address their possible origins. In this respect the role of the media and the manner in which they disseminate information about crime, should be considered and evaluated.

**2.3 Question:** *Are there other powers which would assist agencies to tackle environmental crime and anti-social behaviour more effectively and make neighbourhoods safer and if so what?(Pg.23)*

- Expansion and development of neighbourhood watch schemes throughout Northern Ireland.
- Women’s Aid welcomes the proposal (Pg.29) to invest in youth diversion activities.
- We strongly support the principle and practice of early intervention programmes and therefore advocate funding and encouraging preventative work in schools.

**2.4 Question:** *How can we best tackle environmental crime such as graffiti, litter, vandalism, abandoned vehicles, fly-tipping and fly-posting? (Page 24)*

- Funding and support for youth and community groups and initiatives within communities.
- Organising positive activities e.g. art and music projects, drop-in centres and youth clubs.
- Encouraging and funding the ability of communities to make their local areas their own e.g. by the creation of gardens and play areas.
- Encouraging a sense of community and communal ownership and responsibility for their environment.

- Contribute to improving and sustaining improvements within smaller areas e.g. on a street by street basis.
- Examine and address the underlying causes of this behaviour.

**2.5 Question:** *How can we improve the protection available to our emergency services workers? (Page 25)*

- Preventative work in schools.
- Greater emphasis, funding and support for early intervention programmes such as those outlined on pages 28 & 29.

**2.6 Question:** *What else can we do to make our town centres safer and more attractive at night? Please outline suggestions? (Page 25)*

- We suggest exploring the possibility of staggering closing times for pubs and clubs.
- Similarly, examining the possibility of more frequent night buses.
- Initiating more 'get home safe' programmes with designated emergency meeting points.
- Improving the level of Police patrols, particularly in rural areas.

**2.7 Question:** *Are these the right measures? (Page 26)*

- Women's Aid would welcome an examination of the possibility of expanding the Hate Incidents Practical Action (HIPA) scheme to include victims of domestic violence. (Pg.26)

**2.8 Question:** *How can we make our town centres safer and more attractive during the daytime? (Page 26)*

- Women's Aid supports efforts to improve the physical environment and the proposal to work with the PSNI, housing providers and town planners to "design out" crime.

**2.9 Question:** *Are there any others we should be considering? (Page 26)*

- Women's Aid would wish to stress that any measures should be inclusive of the needs of those living in rural communities who experience increased levels of isolation.

## **Focus on Families and Young People**

### **Parenting Support Contracts**

### **Parenting Support Orders**

### **Individual Support Orders**

### **Parental Compensation Orders**

**2.10 Question:** *Would these powers be suitable for offering people a way out of offending? (Page 28)*

- Women's Aid has a number of serious reservations regarding the powers and proposals outlined on pages 27-31 of the consultation document.
- Of particular concern are the proposed new powers outlined on page 28. Specifically the option of introducing Parenting Support Contracts and Orders.
- We are deeply concerned that "informal," "voluntary," Parenting Support Contracts could be utilised as evidence when an application is made for a Parenting Support Order. As such, failure to comply with the initial Contract could ultimately result in criminal liability.
- Women's Aid questions the nature of the "support" mandated for parents under the Parenting Support Orders and whether consideration will be given to mothers who have experienced domestic violence and the struggle to parent effectively whilst being subjected to violence and abuse.
- We further question whether both parents will be involved in any proposed parenting programme, or whether sole responsibility will fall upon the parent with care?
- In the context of domestic violence, participating in a parenting programme which involves both parents, could endanger the safety of women and children who have left an abusive partner.
- We are also anxious that Parenting Support Contracts and Orders may be utilised by perpetrators of domestic violence in the context of family court proceedings e.g. seeking child contact orders.
- The consultation document does not outline the specific consequences of breaching Parenting Support Orders.
- In the opinion of Women's Aid there is a danger that these powers could contribute to exacerbating the problems of a struggling family through the resultant increased levels of stress and anxiety.

- We also question the potential level of co-operation and compliance with mandated parenting programmes, particularly in the case of hard to reach parents and the negative impact of any associated stigma.
- It is our view that Parental Compensation Orders raise the issue of effectively criminalising those under the age of 10 by virtue of applying potentially criminal consequences to their actions.
- In the context of examining the UK's compliance with the UNCRC, The United Nations Committee on the Rights of the Child reiterated in 2008, its 2002 concluding observations, which recommended that the UK Government should raise the age of criminal responsibility. The Committee further stated that an age of criminal responsibility below the age of 12 was, "internationally unacceptable."<sup>2</sup>
- Women's Aid also questions whether it is appropriate to make parents, particularly those on low incomes, financially responsible for damage caused by their children. This may cause many to become dependent or more dependent on debt and "loan-sharks" to discharge their obligations, or risk imprisonment.
- We believe that greater consideration should be given to exploring alternative measures for addressing this type of behaviour in the very young.
- Clarification is required regarding the provision of support under the Individual Support Orders.
- Detail is also required on the specific sources of funding available to facilitate any extra workload for providers.
- The Community Safety Unit should ensure close links and joined up planning with Children's Service Planners who are currently looking at the Family Support Strategy, prevention and early intervention.

**2.11 Question:** *Are there advantages to bringing in legislation to introduce parenting support orders to Northern Ireland? If yes, please define. (Page 28)*

- It is difficult to explore fully the advantages and disadvantages of the orders without some clarification on the precise nature of the proposed support.
- The consultation lacks specificity about the precise consequences of a number of the proposals.

---

<sup>2</sup> Paragraph 32 General Comment No. 10 Children's Juvenile Justice CRC/C/GC/10 April 2007

**2.12 Question:** *How can we best divert young people from becoming involved in crime and anti-social behaviour? Please outline approach.*

- Women's Aid is currently pro-actively engaged in a number of programmes, working directly with young people, such as "Heading for Healthy Relationships" which encourages a respect for each other and themselves.
- We believe that the positive contribution made by early intervention programmes needs to be acknowledged and to urge continued funding, expansion and prioritising of these initiatives.
- We support efforts to integrate this type of work into the curriculum in schools i.e. Citizenship to encourage young people to feel a part of the wider society and their local communities.
- Similarly we support the ongoing programme of inter-generational work as outlined on pages 29-30 and would advocate that these initiatives are designed as a two-way dialogue and exchange, to create a mutual understanding between the generations.
- We would wish to stress our opinion that any additional work carried out by the voluntary sector must be funded and the sources of funding should be mainstreamed.
- The overall causes of crime are complex and subjective. In addressing them there is a need for an holistic approach that recognises the numerous factors that contribute to crime.
- Government should facilitate and encourage a culture of community volunteerism.
- All sections of the public, including young people, should be encouraged to respect the physical environment.
- Encouraging programmes which allow young people to see the physical and emotional consequences of crime.
- Targeted, tailored and fully assessed support for parents and families.
- Encouraging a rejection of violence.
- Support and funding for education and training and developing employment opportunities.

**2.13 Question:** *How do we best make support available to parents? (Page 30)*

- Women's Aid is already engaged in a number of support programmes for mothers. These include 'Journey to Freedom' and 'You and Me, Mum'.
- There is a need for these programmes to be available across Northern Ireland and a requirement for continued and sustainable funding.
- Mothers who have experienced domestic violence need to feel safe to participate in any programme.
- The co-operation of participants is essential as such any perception of punishment is likely to be counter-productive.

### **Supporting Rehabilitation of Offenders**

**2.14 Question:** *Are these proposals likely to assist in reducing offending and/or re-offending? (Page 31)*

- Given the levels of repeat offending associated with perpetrators of domestic violence, Women's Aid would welcome funding for research, designed to assess the outcomes of perpetrator programmes such as Men Overcoming Domestic Violence (MODV).

**2.15 Question:** *Are there other ways to support and provide services to those who have been involved in crime and anti-social behaviour to tackle the causes of crime and prevent them re-offending? If so please outline. (Page 31)*

- Facilitating training programmes and internships.
- Developing and encouraging employment opportunities, particularly in disadvantaged areas.

### **Building Strong, Confident Communities**

#### **Support for victims and witnesses**

#### **Empowering communities**

#### **Raising awareness**

#### **Improving public services**

#### **Supporting the particularly vulnerable**

**2.16 Question:** *Are these proposals the correct way forward? (Page 33)*

- Whilst we note the intention to “strategically invest” in the voluntary sector to support victims and witnesses of crime, we would welcome greater specificity on the details of the proposals particularly in respect of the support available to victims.

**2.17 Question:** *Do Court processes for victims of anti-social behaviour and crime need improvement and if so how?*

**2.18 Question:** *How can we improve the support available to victims of crime and anti-social behaviour?*

- Reduce the lengthy waiting times at court for domestic violence victims.
- Encourage and facilitate the use of barristers who are fully trained in domestic violence.
- Address the lack of sensitivity on the part of court officers and officials towards victims of domestic violence through training.
- Address the absence of separate waiting facilities in some courts.
- Improve the level of information available on security measures such as separate entrances.
- There is a need for greater training for District Judges in domestic violence.
- There is currently no uniformity of consequence in respect of sentencing, for perpetrators of domestic violence.
- Improved child care facilities in Court buildings.
- Fewer adjournments

**2.19 Question:** *How can we better empower communities to engage in community safety initiatives? (Page 34)*

- Facilitate improved consultation and communication with communities.

**2.20 Question:** *Should we introduce community payback? (Page 34)*

- Women’s Aid seeks greater clarification on the specific proposals in relation to this scheme. We are concerned that aspects of the implementation of this scheme in other jurisdictions, may constitute punishment by humiliation.

- We are also concerned that there may be safety implications, particularly for women who are victims of domestic violence.
- We are anxious that there is the possibility of encouraging vigilantism.
- We would suggest that the term “payback” is excessively pejorative and should be changed.

**2.21 Question:** *How can we facilitate communities inputting to this process? (Page 34)*

- Identifying key publics i.e. Tenants Associations, Youth Groups etc and having an open consultation process.
- Facilitating public meetings.
- Considering options for individual feedback on proposals, such as Internet based forums.

**2.22 Question:** *What are the best ways of raising the profile of community safety so that people feel safer? (Page 34)*

- Encouraging more positive media stories.
- Highlighting positive initiatives.
- A community newsletter.
- An interactive website designed to highlight positive community initiatives and successes and receive feedback from local communities.

**2.23 Question:** *How can we encourage more people to report crime and anti-social behaviour? (Page 34)*

- Anonymous reporting and response.
- The use of plain clothed police and unmarked vehicles.
- The ability to meet police at a neutral venue.
- Individual, named and known officers in each community.
- An effective policing and judicial response to reported incidents.

**2.24 Question:** *Are the proposals appropriate? (Page 36)*

- Women's Aid is deeply disappointed that the document fails to offer any substantive new proposals or initiatives in respect of domestic violence.
- We welcome and encourage the consideration of piloting an integrated family court.

**2.25 Question:** *What would help to improve the court experience for victims of domestic violence and sexual violence?*

- A dedicated room/s for victims in all court buildings.
- The availability of liaison workers with relevant agencies (i.e. Women's Aid)
- Clear and concise explanations of legal proceedings.
- Realistic timescales for legal proceedings.
- Fewer adjournments, particularly for repeated non-attendance by the accused.
- Greater support for women involved in civil proceedings i.e. Non-Molestation Orders/Occupation Orders and Contact proceedings.
- Women's Aid would wish to cite the example of the Community Justice Project in Causeway which has provided this type of support to women for over three years funded by the Community Safety Partnership, Moyle and the PSNI. Despite annual evaluations, CSU has not examined the possibility of sustaining funding or rolling such support out to other areas in Northern Ireland.
- Training in domestic violence is vital for all members of the judiciary.

**2.26 Question:** *What other action can we take to help particularly vulnerable members of our community feel safer? (Page 37)*

- Pro-active, community policing.
- Increase public confidence in the criminal justice system by working towards a consistency of approach and consequence across Northern Ireland, particularly in respect of domestic violence.
- Ensure training for police, prosecutors and judiciary in specialist areas i.e. domestic violence.

## Chapter Three: Delivery

**3.1 Question:** *Are there other ways in which we can encourage organisations to work together more effectively on crime and anti-social behaviour issues? (Page 39)*

- These proposals require to be outlined in much greater detail. There is a lack of specificity in respect of the nature of the proposed improvements to the process of information sharing or the accompanying protocol.
- Confidentiality and security must be of paramount importance in any process.

**3.2 Question:** *How can we best inform the public about performance? (Page 40)*

- A dedicated website and/or Forum.
- Community Newsletters or email shots.

### Glossary:

**Question 2:** *Do you consider that any of the proposals in this document will have an adverse impact on groups within any of these nine categories? If so, what is it and how might we mitigate against this adverse impact?*

- Women's Aid is concerned that proposals in respect of Parenting Support Contracts and Order will fall disproportionately on Mothers.
- We are also concerned that dispersal zones will have an adverse effect on children and young people under Section 75.

For further information about this response contact:

Gillian Clifford  
Policy & Information Worker  
Women's Aid Federation Northern Ireland  
129 University Street  
BELFAST BT7 1HP  
Tel: 028 9024 9041

[info@womensaidni.org](mailto:info@womensaidni.org)

Website: [www.womensaidni.org](http://www.womensaidni.org)

24 Hour Domestic Violence Helpline - 0800 917 1414