



Northern Ireland
Women's European Platform

Submission to the List of Issues examination of the UK by the Committee of the Convention to Eliminate Discrimination against Women

11 June 2018

Introduction

The Northern Ireland Women's European Platform (NIWEP) is a membership organisation of women's NGOs in Northern Ireland. NIWEP has prepared this submission to assist the Committee in its consideration of the List of Issues for the 2019 examination of the UK under the CEDAW by setting out some high level themes of concern where we recommend that the Committee seeks additional information from the State party at this stage. In addition NIWEP contributed to a UK wide NGO compilation of issues in order to reflect the situation of women across the State party.

NIWEP is carrying out an engagement programme during the six months to November 2018 to gather further evidence from NGOs and women in Northern Ireland in order that a comprehensive shadow report is prepared for the examination.

Context

Devolution

Northern Ireland is a devolved nation within the UK but no Executive has been formed in the current mandate and the devolved Assembly is not sitting¹.

As the Committee has noted in its Concluding Observations of 2008 and 2013, devolution cannot be used as justification for the unequal application of the Convention across the UK as the state party is the Westminster government. The current lack of a devolved government in Northern Ireland cannot therefore be used to explain or justify the lack of progress on substantive issues.

In addition, as the list of issues below show, progress on the implementation of the Convention was poor in the first three years since the last examination and before the collapse of the

¹ The UK [Common Core Document](#) does not reflect recent changes (para 15). The Northern Ireland Assembly now has 90 members and an Executive would be made up of a First Minister, Deputy First Minister, two Junior Ministers and eight departmental ministers. In the restructuring that reduced the number of departments for equality, including gender equality moved from the responsibility of the First Minister and Deputy First Minister to the Department for Communities, a move considered negative by many.

Northern Ireland institutions².

Austerity

The State party's austerity agenda continues to have a disproportionate impact on women³, exacerbated for women who are disabled, black, Asian, minority ethnic or refugee women and unpaid carers. Women experience the impact as mothers and carers, as disproportionately reliant on benefit and as greater users of public services as well as the majority of the public sector work force.

A 2014 report by Oxfam shows that women in Northern Ireland are disproportionately affected by austerity, with female unemployment rising to a 25 year high and female earnings as a proportion of male earnings falling.⁴

Brexit

Northern Ireland's distinct circumstances mean that it will be profoundly affected by the UK leaving the European Union (Brexit). Having a land border with another EU Member State means there are not only trade considerations but health, social care and education provision issues as well as matters related to securing peace in Northern Ireland⁵.

The Good Friday Agreement is an international treaty committing to equivalence of equality and rights across the border.

It is widely believed that these factors are not understood or appreciated in the current negotiations.

Women NGOs in Northern Ireland have called⁶ for the State party to prioritise equality and rights protections in exiting the EU to ensure there is no regression of rights and also that there will be no divergence in the future. Specifically, there are calls for a Bill of Rights and for resources to assist in the navigation of the impacts⁷.

Progress

Overall progress is slow and in some areas may be considered to have been reversed. The State party report⁸ fails to make visible commitment to gender equality in Northern Ireland and to a gendered approach to policy development based on gendered analysis, gender mainstreaming and gender budgeting, despite these mechanisms being commitments of the last gender equality strategy⁹. It does not demonstrate an understanding of the Convention

² July 2013 – January 2017

³ Between 2010 and 2020, cuts to the social security budget will amount to £82 billion and up to 86% of this will be borne by women. Women's Budget Group (2015) [Response to the Autumn Statement and Spending Review 2015](#) and [Response to the 2016 Budget](#)

⁴ [Oxfam Ireland 2014](#)

⁵ BrexitLawNI [Women's rights and brexit](#)

⁶ Unpublished letter from Women's Policy Group to Fawcett sex discrimination law review, June 2017

⁷ [Northern Ireland Women's Rural Network meet with Michel Barnier](#)

⁸ [Eighth periodic report submitted by the UK](#) November 2017

⁹ A 'mainstreaming approach is an essential process for the removal of the structural inequalities which give rise to gender inequalities'. Department for Communities [Gender Equality Strategy 2006-2016](#) Mainstreaming is a requirement of the duty to have due regard to the promotion of equality of opportunity placed on public bodies in Northern Ireland by Section 75 of the [Northern Ireland Act 1998](#) The Women's Regional Consortium's [Response](#)

and the requirements of the reporting system¹⁰. The report also does not show that data, gender disaggregated, is available on which to base policy and decision making¹¹.

In *Women at the Cutting Edge* Northern Ireland NGO, Reclaim the Agenda, set out an action plan developed with women across Northern Ireland for next steps on women's equality in Northern Ireland¹².

Concern has been expressed over the State party report's contention that incorporation of the provisions of the Convention would be disproportionate in terms of gender.

Articles 1-4 (Discrimination, policy measures, human rights and fundamental freedoms, special measures)

A draft Programme for Government¹³ setting out strategic priorities for the following five years was published by the Northern Ireland Executive in 2016¹⁴. It is not formulated around government's international human rights obligations, there was a lack of a gendered perspective and the opportunity was not taken to strengthen mechanisms for achieving equality, including high level government policy with cross-cutting impact. The lack of a focus on gender is even more concerning as the government failed to act on the review of the Gender Equality Strategy committed to in the previous State party response to the list of issues in 2013. Northern Ireland has currently no GES or other significant strategies aimed at addressing structural or societal gender inequalities. Government has no confirmed childcare strategy¹⁵ or carers' strategy¹⁶ and generalist strategies such as the draft economic strategy

[to the Draft Programme for Government Framework 2016](#) sets out necessary elements of the PfG: strong indicators and measures; gender disaggregated data; gender (equality) responsive budgeting; attention to the most vulnerable, social protection and childcare; and a framework that is rights compliant.

¹⁰ Some reporting is out of date (para 46 – the strategy *Success through Stem* finished in 2012) and, indeed, a positive step of introducing targets in appointments of women to boards is omitted.

¹¹ In 2016 TEO consulted on the withdrawal of annual compendia of statistics *Gender Equality Statistics* and *A profile of older people in Northern Ireland*. WRDA (2016) [Response to withdrawal of official statistics publications](#)

¹² Reclaim the Agenda (2017) [Women at the cutting edge: conference report and action plan](#) The #Time2Commit campaign seeks: women's equality in law and policy and the protection of women's rights (through a gender equality strategy, gender budgeting and resources); the elimination of disadvantage for women due to pregnancy and caring (through affordable accessible childcare, recognition of unpaid work and reform of abortion law); commitment to sustainable partnership with women's groups (through incorporating and hearing women's voices and consolidated support for women's groups and services).

¹³ Northern Ireland Executive (2016) [PfG consultation document](#)

¹⁴ The Executive Office published an [Outcomes delivery plan 2018-19](#) on 4 June 2018 to set out actions for departments in 2018-2019. It is based on a well being model and reflects closely the draft Programme for Government

¹⁵ The State party's [response](#) to the List of Issues in 2013 stated (para 149) '*The Northern Ireland Executive has committed to establish a system of affordable, accessible childcare by 2013 and is currently consulting on the proposed Childcare Strategy*'.

¹⁶ Northern Ireland is lagging behind the rest of the UK in addressing carers' issues, in terms of both strategy and law development. The recommendations of the Northern Ireland Human Rights Commission 2014 inquiry, [The Human Rights of Carers in Northern Ireland](#), have not been implemented. These included that programmes aimed at alleviating poverty should take full account of the challenges faced by carers and enhancement of legal protections for carers seeking the right to work. *Caring for Carers* (2006) is the most recent Northern Ireland strategy, whereas more recent strategies have been published in Wales in 2013, and in England in 2014. In

are virtually silent in respect of women.

Following the last examination, the State party wrote¹⁷ to the Committee to set out, *inter alia*, that Government Equalities Office had a mandate in Northern Ireland for CEDAW and CSW and engagement in those areas. It is unclear how that mandate is exercised in Northern Ireland and a Westminster Committee has made recommendations about the better functioning of the policy function for women and equalities issues¹⁸.

The government has not acted on the recommendations in the Concluding Observations (2013) with regard to ensuring that women in Northern Ireland enjoyed the same protections as women in the rest of the UK. While there is provision in the Employment Act (Northern Ireland) 2016¹⁹ for reporting on the gender pay gap, in the absence of an Executive, Regulations have not been made to bring this requirement into effect. The Fawcett Society published a review of sex discrimination law²⁰ (2018) which includes a chapter outlining some of the weaker protections for women in Northern Ireland²¹.

We recommend that the Committee asks State party how women's equality and rights are embedded in Northern Ireland policy and legislation and how GEO effectively exercises the jurisdiction claimed in regard to CEDAW in Northern Ireland

Violence against women

Like England, Scotland and Wales, structural inequalities within Northern Ireland's traditionally patriarchal society are reflected in high levels of violence and abuse perpetrated by men against women. There are a number of ways, however, in which Northern Irish women experience VAWG uniquely. Women still bear the scars of 30 years of conflict, during which they were either discouraged from reporting gender-based violence in the interest of the 'greater good', or felt they could not report gender-based violence because of their community's hostility to the police force. Many women are only now dealing with the decades of gender-based violence they endured during this time. Other women in communities still hostile to police remain without recourse to justice or support²².

Scotland, The Carers (Scotland) Act 2016 introduces a duty to support carers whose needs cannot be met by general services and includes a strong focus on young carers, many of whom are girls and young women.

¹⁷ [Letter November 2013](#)

¹⁸ Women and Equalities Committee (2018) [The role of Minister for Women and Equalities and the place of GEO in government](#) 2nd report 2017-2019 The report calls for the Minister and GEO to be stabilised in government and resourced.

¹⁹ [Employment \(Northern Ireland\) Act 2016](#)

²⁰ Fawcett Society (2018) [Review of Sex Discrimination Law](#)

²¹ The review recommends, *inter alia*: the introduction of a Single Equality Act; clarification of the definition of direct discrimination to include on grounds of pregnancy; prohibition of discrimination and harassment by public bodies on grounds of sex when carrying out their public functions; extension of the scope of voluntary positive action; measures on pay secrecy and multiple discrimination; and the introduction of a new Gender Equality Strategy with targeted measures, action plans and budget and improved data collection requirements.

²² All-Party Parliamentary Group Inquiry

In Northern Ireland there are significant differences in respect of VAW from GB²³:

- gender neutral approach to gender-based violence / no VAWG strategy²⁴
- no coercive control law²⁵;
- no abortion access for victims of rape²⁶;
- low rates of conviction for SV crimes – especially marital rape – not adequate protection – myths continue to be used in courtrooms / no judicial training – media reportage of rape trial²⁷;
- no government-funded rape crisis service / waiting list for NEXUS / 245 women turned away from refuge services as there were no beds²⁸;
- Section 5 of Criminal Law Act means that victims of rape must report to police or risk criminalisation themselves²⁹;
- no adequate mandatory SRE education dealing with consent, respect etc³⁰.

We recommend that the Committee asks the State party what steps have been taken to develop for Northern Ireland a comprehensive strategy on violence against women and girls, including an action plan and budget, and to complete ratification of the Istanbul Convention.

²³ This includes areas such as RSE, SRHR and stereotypes and prejudicial attitudes which were referred to by the CEDAW Committee in its report under the optional protocol.

²⁴ Northern Ireland continues to lag behind the rest of the UK in its response to violence against women. The devolved government's response to gender-based violence remains gender neutral through the Stopping Domestic and Sexual Violence and Abuse Strategy, and Northern Ireland lacks a dedicated VAWG strategy or action plan.

²⁵ Unlike the rest of the UK, Northern Ireland does not have any dedicated legislation tackling emotional abuse or coercive control, and other structures set up to tackle domestic violence such as the Multi-Agency Risk Assessment Conference (MARAC) have been established in Northern Ireland without an independent advocate or IDVA to represent the voice of the victim in the process.

²⁶ The continued lack of access to abortion in Northern Ireland means that victims of rape, incest, domestic violence and sexual exploitation who cannot afford to make the journey to England are unable to access abortion.

²⁷ Low rates of conviction for domestic and sexual violence crimes, and pervasive use of harmful myths in the courtroom setting, mean that victims of gender-based violence are not adequately protected by the criminal justice system. This dire situation is compounded by lack of training for the judiciary and other criminal justice agents on gender-based violence. A recent high-profile rape case in Northern Ireland has also led to damaging media reportage throughout the case.

²⁸ Northern Ireland is the only nation in the UK not to have a dedicated, government-funded rape crisis service. While voluntary organisations are endeavouring to establish such a service, its sustainability without government support is in question. This service is a crucial missing piece of the support network for victims of sexual violence in Northern Ireland. Currently, the only sexual violence counselling charity NEXUS has a waiting list of over 800 people, and Women's Aid were forced to turn away 245 women from their refuges last year due to lack of bed spaces.

²⁹ Section 5 of the Criminal Law Act continues to act as a barrier to women getting support for sexual violence. Under section 5, all citizens must report serious crimes to the police. Failure to report a rape offence carries a sentence of up to 5 years. This puts pressure on victims to report to the police, as they and any support workers they disclose to may be liable under the offence. Section 5 has been particularly problematic with the roll-out of the 2 child tax credit limit and 'rape clause' in Northern Ireland, as this unique law means that victims of rape may be forced to report to the police in order to access social security payments.

³⁰ Northern Ireland currently does not have any mandatory Sex and Relationships Education focusing on consent, equality and respect in post-primary schools.

Article 7 (Political and public life)

There is little evidence in general of ensuring women's participation in securing peace or in post conflict reconstruction. The Report³¹ (2016) of the Fresh Start Panel on the Disbandment of Paramilitary Groups in Northern Ireland drew attention to UN SCR 1325 and the stress placed on the importance of the equal participation and full involvement of women in achieving and maintaining peace but concluded there is a real gap between policy and practice and noted that concerns had been expressed to the panel that women's role in community development and public decision making is being undermined due to paramilitary influence³²
33 .

A Westminster Inquiry reviewing the implementation of UNSCR 1325 in Northern Ireland heard how women's participation was being limited, including by economic factors, and that, without appropriate and robust intervention, regression on women's rights and equality was inevitable³⁴. Extensive consultation with women³⁵, shows³⁶ that women hold strong feelings of disempowerment, find difficulties in circumnavigating community gate-keepers and fear harm if they were to speak out. A UNSCR Toolkit³⁷ (2014) was developed by civil society, based on this project, to assist public authorities to enhance women's rights and advance gender equality. It highlights tools and illustrative practice examples as well as indicators. However, the Commission on Flags, Identity, Culture and Tradition³⁸ appointed in June 2016 has only one woman amongst its 15 members and co-chairs.

The consultation document on legacy issues³⁹ (May 2018) acknowledges that a *'disproportionate number of survivors and family members are women'* but it is not clear how that has had an impact on the development of the institutions being consulted on.

In general, women are under-represented in political and public life⁴⁰, however no party has as yet used the provision at Section 43A of the Sex Discrimination (Northern Ireland) Order 1976⁴¹ which allows for lawful positive action in the selection of candidates. Building on work of the Commissioner for Public Appointments, the Northern Ireland Executive agreed targets

³¹ [The Fresh Start Panel report on the disbandment of paramilitary groups](#) (2016)

³² Ibid, para 3.20

³³ While Government has established a Women in Community Transformation Programme this has not completed nor yet been evaluated.

³⁴ Law, E and Gray, AM (2014) [The politics of defining armed conflict in Northern Ireland](#) Open Democracy

³⁵ Women and Peacebuilding: Sharing the Learning

³⁶ Hinds, B and Donnelly D (2014) [Women, Peace and Security: Women's Rights and Gender Equality - Strategic Guide and Toolkit](#) CFNI

³⁷ Hinds, B and Donnelly D (2014) [Women, Peace and Security: Women's Rights and Gender Equality - Strategic Guide and Toolkit](#) CFNI

³⁸ www.fictcommission.org

³⁹ [Addressing the legacy of Northern Ireland's past](#) (May 2018)

⁴⁰ Women make up 31% of Members of the Northern Ireland Assembly and 28% of Members of Parliament for Northern Ireland. 25% of local councillors are women.

⁴¹ [Sex Discrimination \(Northern Ireland\) Order 1976](#)

for women in public appointments. The Commissioner reports⁴² progress to 41% women in total membership of public boards but with the figure falling to 23% of chairs⁴³.

We recommend that the Committee asks State party what mechanisms operate to ensure the internationally recognised principles and protections regarding women, peace and security extend to women in Northern Ireland and specifically how barriers to women's representation are addressed

Article 11 (Employment) (with reference to Article 5 (Sex role stereotyping and prejudice) and Article 10 (Education))

Stereotypes

Pervasive sex role stereotypes affect women in Northern Ireland throughout their lives. There is a wide spectrum of impact of these stereotypes from violation of rights⁴⁴ and violence against women through to women's daily lives and the economic and social impact of the marked imbalance in caring roles including paid and unpaid caring. They also result in discrimination in the workplace⁴⁵.

Education

Stereotypes have an impact in education. The Committee has called for standards in relationships education⁴⁶ and the Equality Commission has called for action on gender based bullying⁴⁷. Studies show widespread occupational segregation resulting from subject choice and careers guidance⁴⁸.

Employment

Women continue to be disproportionately represented in part time low paid precarious work⁴⁹.

While it has been shown how valuable skills in STEM can be to the economy and how supporting women to enter and remain in STEM can solve Northern Ireland skills shortages, studies show persistent decline in numbers of girls progressing in STEM study⁵⁰.

⁴² OCPANI (2018) [CPANI Annual Report 2016-17](#)

⁴³ The target is equal representation by 2020/2021 but Commissioner observes that reaching the targets will be made all the more difficult following the fall of the institutions in January 2017 as, without Ministers, no new appointments can be made.

⁴⁴ CEDAW (2018) [Report of the Inquiry under the OP into abortion in Northern Ireland](#)

⁴⁵ An Equality Commission for northern Ireland [investigation into pregnancy and maternity](#) (2016) found that 'A significant percentage (36%) of women participating in this investigation believe that they have been treated unfairly or disadvantaged at work as a result of their pregnancy or having taken maternity leave'.

⁴⁶ CEDAW (2018) [Report of the Inquiry under the OP into abortion in Northern Ireland](#)

⁴⁷ ECNI (2016) [Gender Equality Priorities and Recommendations](#)

⁴⁸ ECNI (2018) [Statement of Key Inequalities in Employment](#)

⁴⁹ Wilson, L (2017) [The gendered nature of employment and insecure employment in Northern Ireland a story of continuity and change](#) Nevin Economic Research Institute

⁵⁰ MATRIX (2018) [Women in STEM Report](#) In 1999, 11,943 boys and 11,104 girls were born in Northern Ireland. In 2014/15, 87.6%* of the girls (9,647) took STEM GCSEs, compared to 91%* (10,873) of the boys. But when it came to Core STEM A levels or FE vocational exams in 2016/17, only 30.7%* (3,376) of girls took one. That

While addressing the skills shortage would assist the economy, over-emphasis on productivity ignores the contribution of paid and unpaid care work to the economy⁵¹. The most common reason cited by women for being 'economically inactive' is domestic responsibilities. A significant contributor to this is the cost of childcare⁵². There is still no childcare strategy in Northern Ireland to ensure a system of affordable, accessible childcare that supports children's education and development⁵³. The Executive Office *Outcomes Delivery Plan 2018-19* indicator on adult social care⁵⁴ is simply the percentage of adults needing care receiving that care at home with no indication of the nature of provision.

The collapse of the institutions means that the potential in the Employment Act requirement for a strategy and action plan on pay to be transformative – across education, training, occupational segregation, flexible working, rebalancing and revaluing care – remains unrealised.

We recommend that the Committee asks the State party what steps are being taken to transform women's lives in Northern Ireland through eradicating harmful sex stereotypes and rebalancing and revaluing care, including by recognising childcare as an investment in women, children, society and the economy.

Article 12 (Health)

Women in Northern Ireland continue to experience denial of reproductive rights. The UK Government has failed to establish a legal framework to protect and guarantee Northern Ireland women's right to abortion thus exposing them to the health risks of unsafe abortion and to risks of criminal conviction. The government has also failed to address, in any meaningful way, the social, practical and financial obstacles to accessing abortion. Abortion Law is governed by the 1861 Offences against the Person Act and several women have either pleaded guilty or have accepted a caution for offences under this Act. Currently, a mother still awaits trial for obtaining pills over the internet for her 15 year old daughter; there is a pending judicial review of the decision to prosecute her.

The CEDAW Committee published the findings of its inquiry concerning the United Kingdom of Great Britain and Northern Ireland under article 8 of the Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW/C/OP.8/GR/1)⁵⁵.

compares starkly to the 85% (10,221) of boys who did so. So the decline in girls participating in Core STEM between GCSE & A Level/FE is anticipated to be 65%, compared to a 6% drop off for boys. The gender imbalance in Core STEM participants can never recover from this catastrophic decline, so to understand the imbalance we must understand what puts girls off Core STEM at GCSE/A level/FE. The report recommends: leadership and co-ordination; visibility of STEM; improvements in STEM teaching; programmes and promotion in the workplace.*

⁵¹ University of Ulster Economic Policy Centre (2017) [UU Response to Industrial Strategy Consultation April 2017](#)

⁵² Employers for Childcare (2017) [Northern Ireland childcare cost survey 2017](#) 'Childcare is a barrier to work: the average cost of a full time childcare place in NI is £168 per week or almost 40% of average household income.'

⁵³ Childcare for All [Charter](#) 2018

⁵⁴ TEO (2018) [Outcomes Delivery Plan 2018-19](#) The measurement annex for this indicator shows that the data is not disaggregated by gender or other equality characteristic.

⁵⁵ The Committee found that 'de facto limitations rendered access to abortion virtually impossible'. The

Since the publication of the report no action has been taken to implement the Committee's recommendations with the exception of permitting women from Northern Ireland to access abortions free via the NHS in England (announced July 2017)⁵⁶.

A comprehensive test of public opinion in NI⁵⁷ shows there is very strong support for changes to the law.

An Emergency Debate⁵⁸ was held in Westminster on 5 June 2018 to consider abortion in Northern Ireland. Cross party MPs called on the Westminster government to repeal Articles 58 and 59 of the Offences Against the Persons Act 1861 which make it a crime for a pregnant woman in Northern Ireland to have an abortion. The Secretary of State for Northern Ireland, while supporting the need for abortion reform, argued that this had to be left to the Northern Ireland government. This is a highly problematic position which sees the UK government failing to commit to its reserved responsibilities with regard to human rights and given the absence of government in Northern Ireland.

On 7 June 2018 the UK Supreme Court delivered its judgment⁵⁹ on abortion law in Northern Ireland following a challenge brought by the Northern Ireland Human Rights Commission (NIHRC). The Court *'concluded that the law on termination of pregnancy with respect to women in circumstances of rape, incest and fatal foetal abnormality was in breach of Article 8 ECHR. The Court also concluded that the [NIHRC] does not have competence to bring proceedings in its own name without a victim'*⁶⁰. Options are currently being explored to revisit the case with a woman directly affected. A request to the Secretary of State for Northern Ireland has also been made to ensure court proceedings in relation to abortion are not initiated as of the current moment.

We recommend that the Committee asks the State party what steps have been taken to address the injustices and violations identified in its report under the Optional Protocol into abortion in Northern Ireland

Committee also found that the 'State party has failed to prioritise the prevention of unplanned pregnancy through the provision of quality sexuality education'. The Committee found that 'the State party has violated Convention articles: 12 read alone; 12 read with 2 (c), (d), (f), (g), 5 and 10(h); 10(h) read with 16(1)(e); 14(2)(b) read alone; and 16(1)(e) read alone. These articles should be read together with the Committee's GR Nos: 19 (1992); and 35 (2017) on violence against women and gender-based violence against women; 21 (1994) on equality in marriage and family relations; 24 on women and health; 26 (2008) on women migrant workers; 28 (2010) on core obligations of States parties; 32 (2014) on the gender-related dimensions of refugee status, asylum, nationality and statelessness of women; 33 (2015) on access to justice; and, 34 (2016) on the rights of rural women' (para 77).

⁵⁶ Those on incomes of less than £15,276 can apply to get their travel and accommodation paid. While welcome, this measure is grossly inadequate and does not address the fundamental injustices and violations identified by the CEDAW Committee.

⁵⁷ <http://www.ark.ac.uk/publications/updates/update115.pdf>

⁵⁸ hansard.parliament.uk/Commons/2018-06-05/OffencesAgainstThePersonAct1861

⁵⁹ supremecourt.uk/cases/uksc-2017-0067

supremecourt.uk/cases/uksc-2017-0131

⁶⁰ nihrc.org/northern-ireland-termination-law-breaches-women-and-girls-human-rights

Article 13 (Economic and social benefits)

The UK Government's range of measures restricting entitlement to benefits and increasing conditionality have been developed and implemented without regard to the contextual factors which increase women's vulnerability to poverty in Northern Ireland. These include high rates of women's economic inactivity⁶¹, the absence of a childcare strategy, high number of women with adult care responsibilities, a weak labour market, high numbers of women working part time and in precarious service sector jobs and lower than average UK wages.

The new 'two child limit' on means tested benefits is an example of how the State party continues to violate Article 11. Given larger family size and greater dependence on benefit, the increase in poverty will be even greater in Northern Ireland than in other parts of the UK. However, the institutions introducing the changes have not shown how they have taken these factors into consideration.

The existence of a 'rape clause' reveals the inherent flaws in the two child policy generally and is further evidence of why the cap should be repealed in its entirety.

In addition, flexibilities gained to mitigate the harsh impact of Universal Credit, such as split payments, have been eroded due to a combination of ceding legislative consent to the UK Government to bring in welfare reform and the subsequent collapse of the NI Executive.

We recommend that the Committee asks Government if they will repeal the 'family cap' in Universal Credit and what steps will be taken to secure the flexibilities committed to in Northern Ireland and to address the differential impact on women of welfare reform and how they will ensure these remedies have consistent impact across the UK

Article 14 (Rural women)

The lack of gender parity that exists in Northern Ireland is amplified for rural women due to access poverty⁶². The accessibility of education, training, work and childcare provision as well as health and social care and the cost and availability of public transport are factors in determining women's participation in all areas of life in rural areas. In Northern Ireland there is also an historical funding deficit for rural women and rural women's NGOs⁶³, a heightened impact of Brexit and significant distinctive features in regard to the legacy of the conflict and peacebuilding in rural areas⁶⁴.

We recommend that the Committee asks the State party what steps it is taking to end access poverty and ensure the equal participation in economic, social and cultural life of rural women in Northern Ireland.

⁶¹ Female economic inactivity is 33.8% to 24% male and increased by 3.6 percentage points between 2016 and 2017 (NI LFS)

⁶² Northern Ireland Rural Women's Network (2015) [Rural Women's Manifesto](#)

⁶³ 1.3% rural to 98.7% urban. OFMDFM (2012) [Review of Government funding for women's groups and organisations](#)

⁶⁴ Northern Ireland Rural Women's Network (2018) [Rural Voices Research Report March 2018](#)