POLICY & RESPONSE PAPER OF MEN'S DEVELOPMENT NETWORK AND WHITE RIBBON IRELAND TO THE DRAFT THIRD NATIONAL STRATEGY ON DOMESTIC, SEXUAL AND GENDER-BASED VIOLENCE







Policy & Response Paper of Men's Development Network and White Ribbon Ireland to the draft Third National Strategy on Domestic, Sexual and Gender-Based Violence

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Section I – Introduction

As a national organisation which advocates for transforming masculinities, a feminist and intersectional approach to advance the changing of norms and behaviours and to promote gender equality, Men's Development Network welcome the draft Third National Strategy on Domestic, Sexual and Gender-Based Violence. The draft National Strategy reflects a sincere commitment from Government and Department of Justice to move towards a 'zero tolerance' approach which reduces incidences of Domestic, Sexual and Gender-Based Violence (DSGBV), provides adequate support to survivors of DSGBV and challenges and supports changes in norms, behaviours, and attitudes permissive of such human rights abuses and criminal offences.

This paper responds succinctly to the draft National Strategy and is informed by three key features:

- Our organisation's 25 years of practice in engaging with men and boys across Ireland in relation to their health and wellbeing,² their social, emotional, and interpersonal development³ and our client support programmes for male perpetrators⁴ and victims/survivors⁵ of domestic violence.
- Our experience in engaging men and boys as allies for gender equality and in ending Gender-Based Violence is also reflected in our role as national delivery agent of the White Ribbon Ireland Campaign since 2010.⁶
- Men's Development Network is Ireland's only member-organisation within MenEngage Alliance International.⁷ We also serve on the Steering Committee of MenEngage Alliance Europe⁸ and have close relationships with global gender equality institutes such as Instituto Promundo.⁹ As a result, Men's Development Network bring to this policy response practical knowledge of the national and international best practices for engaging with men and boys in relation to gender equality through a transforming masculinities approach which is strengths-based and evidence-based.

¹ For further information, see: https://mensnetwork.ie/ accessed February 24th, 2022.

² Men's Development Network is the Managing and Coordination Partner of the Engage National Men's Health Training Programme. See: https://mensnetwork.ie/mens-health/ and https://engagetraining.ie/ accessed February 24th, 2022.

³ For information on our developmental methodologies for engaging with men and boys and current national programmes for men, see: https://mensnetwork.ie/development-programme/> accessed February 24th, 2022.

⁴ The MEND Programme works with male perpetrators of domestic violence in supporting men to end their violent or abusive behaviour and become non-violent and respectful within their intimate partner relationships. MEND operates across 8 counties in Ireland and also delivers the national CHOICES Programme. See: https://mensnetwork.ie/mend/ accessed February 24th, 2022.

⁵ The Male Advice Line is the national freephone service for male victims/survivors of domestic abuse and violence https://mensnetwork.ie/male-advice-line/ accessed February 24th, 2022.

⁶ For information about White Ribbon Ireland, see: https://mensnetwork.ie/whiteribbon/ accessed February 24th, 2022.

⁷ 'MenEngage Alliance' https://menengage.org/ accessed February 24th, 2022.

⁸ 'Men's Development Network and MenEngage Alliance Europe' https://mensnetwork.ie/menengage/ accessed February 24th, 2022.

⁹ 'Promundo: Healthy Masculinity, Gender Equality' https://promundoglobal.org/ accessed February 24th, 2022.

The purpose of this paper is (1) to recognise the positive aspects of the draft National Strategy, (2) to identify gaps in the strategy and (3) to highlight the areas in which Men's Development Network and White Ribbon Ireland can serve as strategic partners in the achievement of the relevant objectives established in the draft National Strategy.

<u>Section II – Overall Positive Aspects of the draft Third National Strategy on</u> Domestic, Sexual and Gender-Based Violence

Men's Development Network welcome the Introduction chapter's references to the relevant international legal standards including the CEDAW Convention and its General Recommendations, the UN Declaration on the Elimination of Violence against Women and The Beijing Platform for Action. The intersectional approach taken in the Introduction in highlighting the individuals and groups that are particularly vulnerable to DSGBV is also welcomed to establish the appropriate preventative, protection, and policy coordination necessary to ensure that no sectors of society are left behind or invisible in ending Domestic, Sexual and Gender-Based Violence in Ireland.

Men's Development Network are pleased that the draft National Strategy's *Framework for Action* is inspired by and benchmarked against the Council of Europe Convention on Preventing and Combatting Violence against Women and Domestic Violence (Istanbul Convention). The Istanbul Convention as a regional human rights instrument is in our view the best standard on which to base national efforts in preventing violence, providing victim protection, and ending impunity of perpetrators. However, the Convention should also be read interpreted and implemented in accordance with international standards, including the CEDAW Convention and General Recommendations 19 and 35 on Violence against Women and Gender-Based Violence.

We support the structures for coordination and delivery of services established in the draft National Strategy as it reflects a whole of Government approach in terms of oversight, coordination, and delivery of the objectives in the strategy towards an end goal of 'zero tolerance' to DSGBV. The role of Department of Justice and creation of a statutory DSGBV agency is vital in ensuring sufficient and coordinated oversight and accountability and the proposed structures remedy deficiencies in the first and second National Strategies. Men's Development Network also endorse the creation of an NGO Consultative Group and Operational Group which feature in the structures for coordination and delivery and commit to accepting any invitations to serve on these forums.

Men's Development Network welcome the inclusion of our White Ribbon Ireland Campaign and Training/Capacity-Building and Accreditation Programmes at Objectives 1.1.6. and 1.6.6. of Prevention Pillar 1 and encourage that this specific reference is retained in the official National Strategy. We also welcome commitment to ratification of ILO Convention No.190 as integral to ending DSGBV within the world of work. Men's Development Network, in partnership with ActionAid Ireland, the

Irish Congress of Trade Unions (ICTU) and Munster Technological University have been calling on Government to ratify Convention No.190 and implement its accompanying Recommendation No.206.

As a national organisation in the community and voluntary sector, we also embrace the new way of working outlined in the draft strategy and stand ready to embrace our role in the co-design and co-production of awareness-raising campaigns, research, education, capacity-building programmes which engage with men and boys in the most appropriate ways as allies for gender equality and in ending Gender-Based Violence. The strategy outlines our role as a civil society organisation in holding "Government to account on the realisation of this new way of working" and Men's Development Network will do so in a collaborative, cooperative and non-adversarial manner.

Section III – Recommendations for Areas of Changes

The Recommendations set out in this section are established to support Government and Department of Justice in revising this draft National Strategy prior to sign-off on the official National Strategy. Men's Development Network view the inclusion of the below Recommendations as important in achieving the Strategy's target 'Zero Tolerance' to DSGBV¹⁰, as well as its subsidiary objectives: (1) changing norms and behaviours which condone these human rights abuses and criminal offences (2) enhancing understanding of the root causes and impacts of DSGBV across society (3) ensuring significant and ongoing reduction in incidences of DSGBV.¹¹

High-Level Recommendation

Recommendation 1 (a) – Outline of Available Resources to Deliver on the draft National Strategy

(a) The draft National Strategy on Domestic, Sexual and Gender-Based Violence has been presented at a critical juncture in the battle to end DSGBV in Irish society. The presence of these high-level goals is welcome but fails to include an overall budget or outline the total financial resources dedicated to the delivery of the Strategy over the 5-year period. Men's Development Network recommend the inclusion of a budget and high-level total figure which Government is committing to delivery of the National Strategy on Domestic, Sexual and Gender-Based Violence. We further recommend that each pillar of the Draft Framework for Action is adequately budgeted for in the 5-year plan, with a clear commitment to provide funding for non-governmental organisations, the community and voluntary sector as key partners in implementation of the strategy.

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¹⁰ 'Third Domestic, Sexual and Gender-Based Violence Strategy: Draft for Public Consultation' (Department of Justice, 2022) at page 5.

¹¹ ibid

Recommendation 1 (b) – Outline of Available Resources to Deliver on Action Plans.

(b) The Strategy references that an accompanying Action Plan will be published alongside the official National Strategy later in Spring 2022 up to and including the end of 2023.¹² Our Recommendation is that this Action Plan must establish clearly the total available financial resources available to deliver on the objectives selected for delivery between 2022-2023, which will likely focus on the establishment of the statutory DSGBV agency.

Prevention Pillar 1 – Recommendations

Recommendation 2 – Amendments to Objective 1.1.

Objective 1.1 of Prevention Pillar 1 aims to "Enhance the understanding of adults of all forms of DSGBV and educate society to recognise the harm and prevent the human rights abuse that is DSGBV while making clear the pathways to safety and sanctions". Men's Development Network recommend removing the term "adults" and replacing this with "general public" to match terminology and scope of reach of awareness raising activities, as reflected in the Istanbul Convention. The term 'general public' should be interpreted in accordance with Article 30(b)(ii) of CEDAW General Recommendation 35 to include:

- women and men in all levels of society,
- education, health, social services and law enforcement personnel and other professionals and agencies, including at the local level, who are involved in the prevention and protection response,
- traditional and religious leaders,
- perpetrators of any form of gender-based violence, so as to prevent repeating offending. 14

Ensuring that this foundational knowledge and enhanced understanding reaches the above cohorts ensures a strengthened preventative approach and also supports implementation of Objective 1.4.¹⁵

Recommendation 3 – Inclusion of Content on Root Causes

Men's Development Network welcome Prevention Pillar 1 centring on raising public awareness of the forms of DSGBV, challenging stereotypes, and developing campaigns and programmes. In challenging stereotypes, it is important to ensure awareness raising activities accord with international guidelines

¹² 'Third Domestic, Sexual and Gender-Based Violence Strategy: Draft for Public Consultation' (Department of Justice, 2022) at page 6.

¹³ Articles 13(1) and 13(2) Istanbul Convention (2011) use the term 'general public'.

¹⁴ CEDAW General Recommendation 35 on Gender-Based Violence against Women (2017) at paragraph 30(b)(ii).

¹⁵ 'Third Domestic, Sexual and Gender-Based Violence Strategy: Draft for Public Consultation' (Department of Justice, 2022) at page 14.

and address the root causes and symptoms of DSGBV through a victim-centred approach.¹⁶ The CEDAW Committee have noted that States' prevention work must address the underlying causes of Gender-Based Violence and these include "patriarchal attitudes and stereotypes".¹⁷ We recommend the inclusion of focus on root causes of DSGBV in Objectives 1.1. and 1.2. of Prevention Pillar 1, and these root causes include, but are not limited to, "gender-related factors such as men's entitlement, privilege and social norms regarding masculinity".¹⁸ This Recommendation should be read in tandem with Recommendation 9(b) below.

Recommendation 4 – The Language of Engaging Men and Boys

International and national best practices for engaging men and boys indicate the importance of a strengths-based, non-judgemental, non-adversarial and positive approach which is required for productive engagements. The language of Objective 1.1.2 of Prevention Pillar 1 includes "supporting men to call out incidences of Gender-Based Violence" and this is a later stage in the engagement with men and boys which must commence from a strengths-based approach as allies in supporting gender equality and ending Gender-Based Violence. Men's Development Network recommend revising this sentence to read: "encouraging men and boys to contribute to actively preventing all forms of violence" as this is a positive call to action for men and boys which instils supports to build capacity and safety in prevention of DSGBV.¹⁹

Recommendation 5 – Integration and Elaboration of Men's Development Network and White Ribbon Ireland within Prevention Pillar 1

Men's Development Network note specific references to our White Ribbon Ireland Campaign and Training/Capacity-Building Programmes at Objective 1.1.6. of Prevention Pillar 1 in the context of engaging men and boys in ending Gender-Based Violence. This overlaps with Objective 1.1.2. White Ribbon is also mentioned in Objective 1.6.6. of Prevention Pillar 1. in relation to elimination of violence against women within the world of work and creation of White Ribbon Employers, Organisations, Schools/Colleges, and other workplaces. Men's Development Network's White Ribbon Campaign has already started to develop our accreditation programme²⁰ and 2 universities, 8 secondary schools, 1 business and 1 city council have already applied for White Ribbon Status as of February 20th, 2022.

¹⁶ See CEDAW General Recommendation 35 on Gender-Based Violence against Women (2017) at paragraph 30(b)(ii) for clarification. Awareness raising activities should also (i) address stigma experienced by victims/survivors of DSGBV, (ii) include the consequence of DSGBV on children, (iii) dismantle the commonly held victim-blaming belief under which women and girls are responsible for their own safety and for the violence that they suffer, (iv) encourage the reporting of such violence and the intervention of bystanders, and iv) provide information about available legal recourse against DSGBV.

¹⁷ CEDAW General Recommendation 35 on Gender-Based Violence against Women (2017) at paragraph 34.

¹⁸ CEDAW General Recommendation 35 on Gender-Based Violence against Women (2017) at paragraph 19.

¹⁹ The Recommendation is also based on the language utilised in Article 12(4) of the Istanbul Convention (2011).

²⁰ For information on our accreditation programme, see: https://mensnetwork.ie/whiteribbon/ accessed February 24th, 2022.

Our White Ribbon Campaign has been recognised in the draft policy due to its unique expertise in engaging with men and boys in the most appropriate ways as allies in supporting gender equality and ending Gender-Based Violence. Our activities have included pilot capacity-building and accreditation programmes in schools (St. Oliver's School in Drogheda, Co. Louth) and universities (Munster Technological University) as well as non-formal education settings such as sports clubs, however these have been limited to localised delivery in the absence of Government funding to deliver on our preventative work. In the spirit of co-design and co-ownership, we therefore advise that Men's Development Network should listed in the 'Possible Lead/New Location' section for Objectives 1.1.2., 1.1.6., and 1.6.6 of Prevention Pillar 1.

With 25 years' experience engaging men and boys from a strengths-based approach and as the delivery agent of White Ribbon Ireland, Men's Development Network see our contribution as invaluable to the implementation of Objective 1.3.5. of Prevention Pillar 1, to "Develop and deliver specific age-appropriate interventions for boys designed to address and challenge male violence" and see ourselves as a possible lead agency with the Department of Education and National Council for Curriculum and Assessment. The CEDAW Committee highlight that integration of gender equality from early childhood education is essential and that values such as non-discrimination and promotion of non-violent masculinity are core components.²¹ We therefore recommend the inclusion of Men's Development Network as 'Possible Lead/New Location' for Objective 1.3.5. of Prevention Pillar 1. This work will require dedicated resources for programmes and awareness raising which engages with men and boys as allies for gender equality and in ending DSGBV.

Recommendation 6 – Expand Proposed Content of Awareness Raising Activities and Training Programmes

Objectives 1.2. and 1.3. of Prevention Pillar 1 focus on engaging in education programmes in an age-appropriate manner in expanding knowledge across Primary, Junior, and Senior Cycles of education. As noted by National Women's Council in their Submission on the Third National Strategy in relation to consent education, "although this is an important element of DSGBV education, it is but one aspect, albeit an important one. Consent as the primary framing or focus fails to capture the inherent complexities of DSGBV". 22 Men's Development Network recommend that engagements in Higher and Further Education go beyond consent training and include themes mentioned in Article 14(1) of the Istanbul Convention such as gender equality, respect, non-violent conflict resolution in interpersonal relationships, Gender-Based Violence and integrity. 23 issues mentioned above in formal curricular of the higher education)

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²¹ CEDAW General Recommendation 35 on Gender-Based Violence against Women (2017) at paragraph 19.

²² 'NWC Submission on the Third National Strategy on Domestic, Sexual and Gender-Based Violence' (2021) at page 18.

²³ Article 14(1) Istanbul Convention (2011).

To realise Objective 1.3., the SPHE/RSE curriculum should be expanded to ensure the integration of content on gender equality into the curriculum at primary, junior and senior cycle. The content should promote the values of gender equality and non-discrimination, including non-violent masculinities, and ensure age-appropriate, evidence-based, and scientifically accurate comprehensive sexuality education for girls and boys.

Recommendation 7 – Elaboration of Non-Formal Education Settings

Men's Development Network recommend the inclusion of 'cultural, leisure facilities and the media' in Objective 1.3.4. of Prevention Pillar 1, in accordance with the provisions of the Istanbul Convention.²⁴

Recommendation 8 – Integration of Perpetrator Programmes into the Delivery of Frontline Professional Training

We recommend that the National Strategy acknowledge that Domestic Violence Intervention Programmes for men, which have integrated partner support services, providing direct support to female victims and indirect support to children are also part of the Prevention Pillar and need to be part of those providing training to frontline professionals.

Recommendation 9 – Ratification of ILO Convention No.190

Men's Development Network welcome commitment to ratification of ILO Convention No.190 as part of the National Strategy and recommend inclusion of *'ratification and implementation of ILO Convention No. 190 and Recommendation No.206'*. Recommendation No.206 is the accompanying Recommendation to Convention No.190 and integral in ending DSBGV within the world of work.

Recommendation 10 (a) – Greater Scope for Legislation in Prevention of DSGBV: Hate Crime/Speech Legislation

The Istanbul Convention obliges state parties to the Convention to "take the necessary and other measures to prevent all forms of violence covered by the scope of the Convention". As part of the coalition calling for Irish ratification and implementation of ILO Convention No.190 and its accompanying Recommendation No.206, Men's Development Network welcome this measure in terms of ending DSGBV in the world of work and look forward to joining the Tripartite+ consultations at national level in proceeding with transposing the Convention into national standards.

Men's Development Network also note the absence of other legislative measures under Prevention Pillar 1 and call for inclusion of additional legislation in preventing DSGBV. The draft Strategy highlights that use of an intersectional approach highlights that certain individuals and groups are particularly vulnerable to DSGBV. Some interpretations of this could lead to the viewpoint that DSGBV is prevalent within certain communities and Men's Development Network wish to highlight an alternative point of view on this area. National and international research and commentary reflects

²⁴ Article 14(2) Istanbul Convention (2011).

²⁵ Article 12(1) Istanbul Convention (2011).

²⁶ 'Third Domestic, Sexual and Gender-Based Violence Strategy: Draft for Public Consultation' (Department of Justice, 2022) at page 14.

that links exist between racialised and Gender-Based Violence.²⁷ Many individuals and cohorts at heightened risk of experiencing DSGBV are also at heighten risk of experiencing Hate Crimes/Speech incidental to/separate from their experience as a survivor of DSGBV.²⁸

Following a holistic whole-of-society approach towards a zero-tolerance approach to DSGBV, Men's Development Network recommend the passage of a single piece of Hate Crime/Speech legislation in accordance with the conclusions of the Report on the Public Consultation Legislating for Hate Speech and Hate Crime in Ireland.²⁹

Recommendation 10 (b) – Integration of Anti-Racism, Human Rights and Gender Equality within Awareness Raising Activities and Training Programmes

Men's Development Network have identified parallels between the draft National Strategy and the Report on Legislating for Hate Speech and Hate Crime. The draft National Strategy acknowledges the need for awareness raising, education and training as essential components in the Draft Framework for Action in achieving a zero-tolerance approach to DSGBV.³⁰ The Report on Legislating for Hate Speech and Hate Crime refers to how additional measures beyond criminal law are needed:

"Measures ranging from education and awareness to codes of conduct and behaviour are essential to any comprehensive approach to tackling hate speech and hate crime, including by effective prevention." ³¹

Men's Development Network recommend specific mention of Anti-Racism and equality/diversity trainings within Objectives 1.2. and 1.3. of Prevention Pillar 1, given the intersectional framework utilised in the draft National Strategy. This Recommendation should be read in tandem with Recommendation 3 above.

Recommendation 11 – Inclusion of an Objective 1.8. on Review and Extension of the Regularisation of Long-Term Undocumented Migrants Scheme

Department of Justice opened the Regularisation of Long-Term Undocumented Migrants Scheme on January 31st, 2022, and this is a welcome measure in preventing and protecting against DSGBV in

²⁷ 'The Links between Racialized and Gender-Based Violence' (ACLU, 2022)

https://www.aclu.org/news/racial-justice/the-links-between-racialized-and-gender-based-violence/ accessed February 28th, 2022.

²⁸ Reflected in the 2019 EU-MIDS Survey conducted by the European Union Agency for Fundamental Rights (Irish Times, 2019) https://www.irishtimes.com/news/crime-and-law/ireland-among-worst-eu-states-for-racial-violence-based-on-skin-colour-1.3889478 accessed February 28th, 2022.

²⁹ 'Legislating for Hate Speech and Hate Crime in Ireland – Report on the Public Consultation' (Department of Justice, 2020) at page 38.

³⁰ 'Third Domestic, Sexual and Gender-Based Violence Strategy: Draft for Public Consultation' (Department of Justice, 2022) at page 20.

³¹ 'Legislating for Hate Speech and Hate Crime in Ireland – Report on the Public Consultation' (Department of Justice, 2020) at page 19.

Ireland.³² Due to absence of legal status and previous policing practices, research shows that undocumented women fear reporting domestic violence to An Garda Síochána.³³ Men's Development Network call for inclusion of a review of the Scheme and commitment to periodic regularisation Schemes within the National Strategy. Men's Development Network also call for the inclusion of a formal system for the waiving or reduction in fees for applicants to ensure the Scheme is accessible and not financially punitive for undocumented persons, who are at heightened risk of experiencing DSGBV.³⁴

Recommendation 12 – Inclusion of Article 17 of the Istanbul Convention

Article 17(1) of the Istanbul Convention underscores that participation of the private sector and media in the prevention of DSGBV is required. Although the draft National Strategy includes in Objective 1.6.6. to support employers to create workplaces free from sexual harassment, it is important to elaborate on this Objective. Men's Development Network recommend that Objective 1.6. mentions the requirement of the private sector and media to implement policies, guidelines, and self-regulatory standards to prevent violence against women.³⁵

Prosecution Pillar 3 - Recommendations

Recommendation 13 – Integration of CHOICES Programme within Objective 3.4.

Men's Development Network recommend that the DPSU include in their remit a requirement that where it is appropriate and safe, men who have been violent/abusive within their intimate partner relationship be referred to the local CHOICES Programme. This is in the light of the many repeat incidents of Domestic Violence recorded on the Pulse system, where no case has been taken by the victim and yet no interventions are being made with the perpetrator.

In relation to Objective 3.4.6., along with the Multi-Agency Risk Assessment Protocols, we would recommend exploration of the DRIVE projects in the UK which have successfully worked with High Risk/High Harm perpetrators and that Choices Programmes be linked to Multi-Agency Risk Assessment Protocols when established.³⁶

³² 'Regularisation of Long-Term Undocumented Migrant Scheme'

https://www.irishimmigration.ie/regularisation-of-long-term-undocumented-migrant-scheme/ (Department of Justice, 2022)

³³ 'Ireland: Undocumented migrant women fear reporting domestic violence' (European Commission, 2020) https://ec.europa.eu/migrant-integration/news/ireland-undocumented-migrant-women-fear-reporting-domestic-violence_en accessed February 28th, 2022.

³⁴ 'Third Domestic, Sexual and Gender-Based Violence Strategy: Draft for Public Consultation' (Department of Justice, 2022) at pages 11 and 56. The draft National Strategy at page 5 also states the "need to provide support for all victims/survivors of gender-based violence" and extension of the scheme with a revised application fee schedule could prove critical in preventing and protecting against DSGBV.

³⁵ In accordance with Article 17(1) Istanbul Convention (2011).

³⁶ 'Responding to perpetrators of domestic abuse in children's social care settings' (Drive Partnership, 2022) http://driveproject.org.uk/drivecsc/ accessed March 2nd, 2022.

Recommendation 14 – Recognition of National Domestic Violence Perpetrator Programme within the National Strategy

Men's Development Network recommend that the National Strategy acknowledges already established programmes for perpetrators, specifically the National Programme for Perpetrators of Domestic Violence (CHOICES Programme) and explicitly refer to the creation and resourcing of a structure to oversee, manage and support this National Programme along with the other initiatives in relation to perpetrator programmes in general.

Policy Coordination Pillar 4 - Recommendations

Recommendation 15 – Effective Regional Structures

Under Objective 4.1.1., Men's Development Network recommend adding "and as perpetrators" in the second sentence so it reads: Responsibility for policy and for service delivery (women's refuges, rape crisis centres and associated helplines, groups working with men as victims and as perpetrators). We would also recommend that the National Strategy look at regional structures that worked in the past e.g. the Regional Planning Committees where there was representation from key statutory and non-statutory agencies. This was a recommendation of the Task Force on Violence against Women (1997).

Recommendation 16 – Research on Factors which Contribute to Domestically Abusive Behaviour

As part of Objective 4.2.3., Men's Development Network recommend that research be carried out on the significant impact of trauma as well as gender on men and boys that may well underpin later violent or abusive behaviour within intimate relationships with a view to informing campaigns focused and early interventions with men and boys alongside on-going research on best practice in working with perpetrators to support sustainable behaviour change and increase safety for victims and children.