



Submission to the Commission on the Future of Policing in Ireland

January 2018

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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.

NWCI's Strategic Plan 2016-2020, *Driving Women's Equality*, aims to build on the progress that NWCI has helped to bring about for women in Ireland to date and sets out our vision for the future to progress key human rights and equality issues for women.

Submission Structure

Our submission addresses the reform of policing in Ireland and the Commission's terms of reference as they relate to women and equality for women in Ireland. The submission covers two themes - (1) women in leadership positions within An Garda Síochána (AGS), including recruitment, promotion and equality & diversity training and (2) violence against women, encompassing investigation, training, management & supervision, support for victims of these crimes and data collection.

In developing this submission NWCI consulted with our member organisations, receiving recommendations from organisations working directly with women to advance women's equality and protection from violence.

Role of NWCI in the implementation adopted recommendations

NWCI, as the national women's membership organisation, is committed to working towards the implementation of any adopted recommendations. Over the past 40 years, NWCI has developed strong evidence-based research resulting in the introduction of a range of policies advancing women's equality and human rights. We will continue to bring forward evidence-based proposals, the perspectives of our members and the lived experience of women on all elements of any recommendations adopted. In this way, we will work with the AGS, the Department of Justice and Equality and the Policing Authority to support reform of policing in Ireland which meets the needs of women and advances equality for women in Ireland.

1. WOMEN IN LEADERSHIP WITHIN AGS

“For An Garda Síochána the integration of Diversity into employment practice and service delivery functions should lead to improved employment conditions, service delivery and police practices across the 9 equality grounds- gender, ethnicity, marital status family status, religion, sexual orientation disability, age or membership of the travelling community.”

Diversity Strategy Mission Statement 2009

The stated aim of the *Diversity Strategy and Implementation Plan 2009 - 2012*¹ was to bring AGS ‘beyond legal compliance’ and to embed diversity across the organisation. Through complementary internal and external diversity units, the strategy endeavoured to increase the numbers of women within the force, and to ‘champion, value and accommodate... all aspects of diversity’². From 2009 to 2018, there have been a number of initiatives aimed at increasing diversity which have been hampered by lack of funds, personnel, and organisational priority. While many promising commitments have been made, the implementation has, unfortunately, been stagnant or non-existent. The Annual Policing Plan 2017 committed to a number of initiatives³ aimed at addressing equality issues and increasing the number of women in leadership. NWCI also understands that there is a new Diversity and Recruitment plan currently under review with Garda Management and as a result our recommendations and analysis on gender and diversity within the force are based on both published reports from AGS, the Policing Commission and the Department of Justice and international research. In addition, NWCI met with the Equality, Diversity and Inclusion Unit (EDI Unit) within Human Resources and Development in January 2018.

International research^{4,5} indicates that there are significant benefits of police forces recruiting more female officers. The National Centre for Women & Policing in the USA’s *Hiring & Retaining More Women: Advantages to Law Enforcement Agencies* lays out advantages of increased numbers of female officers, including the competence of female officers; they are less likely to use excessive force; more likely to implement community-orientated policing; improve law enforcement’s response to violence against women; and that an increased female presence reduces sex discrimination and harassment and can bring about beneficial changes in policy for all members. The *Criminal Justice (Victims of Crime) Act 2017*, transposing the Victims’ Directive (2012/29/EU), and the *Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence* (Istanbul Convention) require the policing system in Ireland to be responsive to the needs of victims of crime. An increase in female officers would be of clear benefit in

¹ An Garda Síochána (May 2009) Diversity Strategy & Implementation Plan, 2009 – 2012 “Beyond Legal Compliance”, garda.ie.

² *Ibid*

³ To fully implementing a performance appraisal process to include an assessment of the contribution of each Garda member to community engagement and public safety; Encourage employees to bring forward any ideas or concerns they may have to ensure that they are listened to and supported; Support the Policing Authority in developing a Code of Ethics and, together with our core values, embed it comprehensively throughout the organisation

⁴ Harrington *et al.* (2003) ‘Hiring & Retaining More Women: The Advantages to Law Enforcement Agencies’, National Center for Women & Policing, a Division of the Feminist Majority Foundation.

⁵ ISPC Report (2013) *Facts and Figures 2012 2013*. Institut for Public Security of Catalonia.

achieving victim-centred policing and on AGS commitments to increase and invest in community-style policing.

Recommendations

- Integrate the equality commitments in Annual Policing Plans into the new Equality Diversity and Inclusion Strategy. Monitor progress at appropriate intervals and make information available to the public.
- Commit specific funding to implement the Equality and Diversity Strategy.
- Ensure that the Equality, Diversity and Inclusion Unit is highly visible within AGS.
- Consult with NWCI on best practice in advancing women in leadership within AGS.

Recruitment

The AGS 2009 - 2012 *Diversity Strategy* had a stated aim of 'creating a non-discriminatory environment in which all are valued and supported regardless of sexual orientation, family status or gender identity'. AGS has also made commitments to increased recruitment of women in the *Modernisation and Renewal programme 2016 - 2021*. Over the past 15 years there has been an increase in the recruitment of women in AGS from 14% in 2003 to the current figure of 26%. However, the vast majority of this increase occurred in 2003-2009 (14% - 21.5%) with an increase of only 4.5% in the past 7 years. The moratorium on hiring clearly had a significant impact on increasing female members of the force. While the AGS recruitment website has a clear focus on diversity, there is an absence of proactive measures to promote the recruitment of women.

As seen in the Table 1 below, women currently make up 26% of the sworn members of AGS and 78% of civilian staff. Taking AGS as a unified workplace, women make up 35% of the force, which is on par with New Zealand, a country of similar size. However, there is a clear over-representation of women in the civilian roles, and an under-representation among sworn members. In addition to this, there is an apparent ceiling past which women do not appear to progress in the same numbers as their male colleagues.

Table 1: Promotion, vertical and horizontal segregation⁶ and analysis of women in particular roles within AGS

Civilian Staff by Level	Strengths at 06.12.2017	Women	Men	% Women	% Men
CAO & Ex Dir, CMO and Directors	9	1	8	11%	89%
PO (Includes assistant CMO)	10	2	8	20%	80%
AP	29	16	13	55%	45%
Professional Accountants	8	4	4	50%	50%
AO (includes Nurse, Researcher)	25	14	11	56%	44%
HEO	108	63	45	58%	42%
EO	317	264	53	83%	17%
Tel Com Tech, Examiner in charge, Photographer, Transport supervisor	21	2	19	90%	10%
CO	1533	1275	258	83%	17%
Industrial Staff (cleaners etc.)	439	302	137	68%	32%
Total Civilian Staff	2499	1943	556	78%	22%
Sworn Members by Rank	Strengths at 30.11.2017	Women	Men	% Women	% Men
Commissioner	0	0	0	N/A	N/A
Deputy Commissioner	2	0	2	0%	100%
Assistant Commissioner	9	2	7	22%	78%
Chief Superintendent	43	6	37	14%	86%
Superintendent	165	16	149	10%	90%
Inspector	273	38	235	14%	86%
Sergeant	1881	341	1540	18%	82%
Garda	10987	3136	7851	29%	71%
Total	13360	3539	9821	26%	74%
All Staff	15859	5482	10377	64%	35%

It is imperative that the civilianisation of AGS is not viewed as a soft means of increasing the percentage of women within the force. The *Modernisation and Renewal Plan*⁷ states that 'women are now involved in every aspect of policing' but the data in Table 1 clearly shows that they are under-represented in decision-making roles. It appears that women are not being promoted at the same rate as their male counterparts. Within the civilian ranks, even though men make up only 17% of Clerical Officers, they make up 89% of Chief Executive Officers, Executive Directors, Chief Management officers and Directors. This

⁶ Vertical and Horizontal segregation relates to organisational structures in which women are not only segregated from their male colleagues by rank or seniority but also by division within the same rank and segregation based on the type of policing work in which they are deployed.

⁷ An Garda Síochána (2016) *Modernisation and Renewal Programme 2016 – 2021*.

imbalance must be addressed and the issue of gender segregated roles must be investigated and corrected.

Focusing specifically on the number of sworn members who are women, the percentage of women at the rank of Garda is almost 30%, however, only 18% have progressed to the level of Sergeants, and the percentage continues to go down until the level of Assistant Commissioner. This could be for a number of reasons, and we would recommend further analysis of training practices and coaching for promotion; the sections of Garda that are most favourable to promotion; and a departmental breakdown of the highest and lowest penetration of female members. As longevity is a key aspect determining promotion, analysis must be made of how maternity/parental leave and reduced hours for caring responsibilities impacts the progression of women within the ranks. Analysis of the overall characteristics that AGS view as favourable to promotion is also important to understand how unconscious or institutionalised gender discrimination and bias may adversely affect female staff's chances of promotion.

Recommendations

- Undertake specific recruitment drives to encourage women to join AGS.
- Undertake a comprehensive gender audit of AGS. This will give the organisation a solid starting point with baseline figures that can be transparently reported. This audit to include:
 - A qualitative study of the experience of women within AGS.
 - An audit of HR practices, including family-friendly measures.
- Conduct exit interviews and post-promotion process interviews.

Recruitment from ethnic minority communities

Women are not a homogenous group and it is important that AGS reflects the diversity of the population it serves. The 2009 Diversity Strategy reports that AGS conducted a systematic '*review of barriers to recruitment [to open] up recruitment to ethnic minority communities*'. There are currently no statistics available on the ethnicity of force members and without regular collection of this data it will be impossible for AGS to effectively monitor or evaluate implementation of equality and diversity goals. As stated in the 2009 Diversity strategy, equality monitoring would allow for greater understanding and transparency on the recruitment of gardaí from ethnic minority backgrounds. There is a gap in AGS recruitment from the Traveller and Roma Communities. Increased inclusion of Travellers and Roma within the force would promote improved relations and mutual trust between members of AGS and these Communities.

Recommendations

- Ensure that statistics (including gender, ethnicity, disability, sexual orientation and membership of the Traveller and Roma Communities, as self-declared by members) are routinely collated and published for transparency.
- Include 'Recruitment of Minority Groups' (inclusive of members of the Traveller

and Roma Communities) as a policing priority.

- Ensure AGS members have access to Irish Sign Language interpreting for engagement with people from the deaf community.

Promotion

There is a lack of consistent, reliable statistics on the number of women in AGS and a lack of awareness within the organisation of the various diversity initiatives. The undertaking of equality and diversity initiatives necessitates monitoring and evaluation of progress and in the increased recruitment and retention of female and ethnic minority members of AGS and their inclusion at every level of AGS. Table 1 demonstrated the vertical and horizontal segregation of women within AGS and indicates a pressing need to address the low level of female promotion compared to male counterparts.

Recommendations

- Ensure the Equality, Diversity and Inclusion Unit has adequate staffing and resourcing to provide quality, reliable statistics, as well as reports monitoring initiatives to increase diversity in recruitment and promotion.
- Investigate the apparent bias in promotion of women indicated in the workforce statistics (see Table 1 above).
 - Review management and supervision practices which may be acting as a barrier to women's progression.
- Establish formal women's networks and support the establishment of informal women's networks.

Gender targets

As seen in Table 1 above, there is significant horizontal segregation within AGS. In the Department of Justice and Equality 2013 report - *Towards Gender Parity in Decision Making in Ireland*⁸ - a 'persistent challenge' faced in tackling these issues is 'a belief in a meritocracy - if someone is good enough they will get to the top. This doesn't take into account the extra constraints and obstacles which women have to contend with'. Research by NWCI emphasised that 'proactive efforts specific to gender'⁹ are needed and that mandatory targets give organisations the structure and push they need to ensure that all issues that might stop women from being promoted in equal numbers to their male colleagues are addressed. As all organisations want the most qualified person possible for the job, knowing there is a gender target encourages organisations to be proactive about ensuring that all employees are enabled to reach their full potential and can easily be selected for promotion and leadership.

⁸ p.35 Dept of Justice and Equality (2013) *Towards Gender Parity in Decision Making In Ireland – An initiative of the national women's strategy 2007- 2016*.

⁹ National Women's Council of Ireland (2015) *Better Boards, Better Business, Better Society- A Handbook for Increasing Woman on Boards in Ireland*.

Recommendations

- Implement gender targets for all levels of promotion within AGS.
- Keep accurate data on efforts by AGS to mentor and develop female employees so they are prepared, confident and qualified when leadership opportunities present themselves.

Policies and procedures addressing discrimination and harassment

International research^{10, 11, 12, 13} demonstrates recurring barriers faced by women when joining a police-force which centre around male-dominated and closed cultures. While women remain low in numbers within AGS and particularly in more senior roles, there can be both direct and indirect pressure to conform to a culture that actively hampers their development.¹⁴ The Policing Authority's *Code of Ethics* for AGS¹⁵ provide strong commitments to zero tolerance of workplace harassment and we would encourage AGS to conduct cultural audits to monitor and evaluate how well the various divisions are embedding the Code into their units.

Recommendations

- Promote uptake of family-friendly policies to both men and women within AGS.
- Embed the Code of Ethics and Workplace Bullying and Harassment policies across AGS.
- Provide specialised training to recognise harassment and abuse.
- Provide protected lines for disclosures and resources for victims of workplace harassment.
- Develop swift, proportionate disciplinary actions and mechanisms to ensure that those reporting the harassment do not receive any negative consequences for coming forward.
- Implement Recommendation 3.1 of the 2015 Report of the AGS Inspectorate¹⁶ to conduct cultural audits and implement the necessary corrective measures.

¹⁰ Cain, Laverick (2017) 'Policing Reform: the consequences for the gender agenda and the female police workforce', Faculty of Humanities, Law and Social Sciences, Manchester Metropolitan University.

¹¹ Harrington, Lonsway, Moore, Smeal, Spillar (2003) 'Hiring & Retaining More Women: The Advantages to Law Enforcement Agencies', National Center for Women & Policing, a Division of the Feminist Majority Foundation.

¹² National Center for Women & Policing, a Division of the Feminist Majority Foundation (2002) 'Men Women, and Police Excessive Force: A Tale of Two Genders'.

¹³ British Association for Women in Policing (2014) 'Gender Agenda 3'

¹⁴ Bikos, L. (2016) "'I took the blue pill'" The effect of hegemonic masculine police culture on Canadian policewomen's identities'. *MA Research Paper*. https://ir.lib.uwo.ca/sociology_masrp/7

¹⁵ Policing Authority (2016) 'Code of Ethics for the Garda Síochána'.

¹⁶ Changing Policing in Ireland' The Garda Inspectorate, 2015

Recommendation 3.1: "The Inspectorate recommends that the Garda Síochána assigns to the recommended Deputy Commissioner Governance and Strategy the responsibility to ensure alignment of the Garda Síochána organisational culture with the policing plan and the reform programme. (Short term) To achieve the above recommendation, the following key actions need to be taken: Conduct, on a regular basis, a cultural audit of the real working culture within the organisation informed by both internal and external stakeholders; Develop and implement a cultural reform programme, to be adjusted as necessary in the light of the findings of the regular cultural audits."

Management and supervision

Mentoring, promotional training and talent management are all mechanisms to ensure that the full potential of female officers is reached. It is important that all managers are properly trained on how to effectively manage a diverse group of employees, balancing between the requirements of the job and the flexibility needed to ensure that female employees are retained in different sections and are not denied promotional opportunities.

The fewer people reporting to an individual sergeant can ensure that individual gardaí receive adequate supervision and support to carry out their duties. The Inspectorate's Front-line Supervision Report highlighted a ratio of six police officers to one sergeant as more than satisfactory; however this is rarely the practice, particularly in urban divisions.

Recommendations

- Implement recommendation 3.9 of the 2015 Report of the AGS Inspectorate: *The Inspectorate recommends that the Garda Síochána develops a structured approach to engagement at all levels between senior managers and all staff and develops processes that encourage all staff to contribute to improving organisational performance.*¹⁷
- Implement recommendation 3.11 of the 2015 Report of the AGS Inspectorate: *that the AGS develops a Talent Management Strategy to identify and develop leaders for the future.*
- Implement recommendation 3.12 of the 2015 Report of the AGS Inspectorate, *Changing Policing in Ireland*¹⁸: that the AGS develops key performance indicators to measure the effectiveness of leadership and supervision initiatives.
To achieve this recommendation, the following key actions need to be taken:
 - Roll-out and publish regular staff surveys at corporate, national and divisional levels.
 - Develop 360-degree reporting as part of all senior management promotion and development programmes.
- Undertake qualitative research within AGS to identify gaps in management and supervision to encourage and promote qualified female members.
- Implement training and mentoring programmes for women within AGS, with a specific focus on management.
- To address supervision ratios, review the use of sergeants, inspectors and superintendents assigned to administrative and non-operational positions and prioritise deployment to front-line duties. Extend the existing process for those in acting roles to perform duties at the next rank.

¹⁷ Garda Inspectorate (2014) *Changing Policing in Ireland*, p.16: Assignment of appropriate numbers of supervisors to all front-line units; Visible leaders who can inspire and provide clear direction. Leaders and supervisors with effective decision-making skills; Creation of a learning organisation; Publication of clear roles and responsibilities for all supervisors; An organisation where people are engaged at all levels, where people feel valued and are rewarded for high performance; Higher standards of performance, dress and behaviour; The Garda Síochána must become a learning organisation that enables leaders and supervisors to have the confidence and professional judgement to make decisions appropriate to their rank or grade.

¹⁸ The Garda Inspectorate (2015) *Changing Policing in Ireland*.

Recommendation 3.11: The Inspectorate recommends that the Garda Síochána develops a Talent Management Strategy to identify and develop leaders for the future. (Short term)

Recommendation 3.12 The Inspectorate recommends that the Garda Síochána develops key performance indicators to measure the effectiveness of leadership and supervision initiatives. (Medium term)

Equality and diversity training

Training of new recruits and ongoing CPD for current members is an important mechanism to embed equality and diversity within AGS. As part of the implementation of the *Equality, Diversity and Inclusion Strategy*, it is imperative that quality equality training is delivered to every member of AGS. This training should include a mix of information sessions on specific issues, as well as workshops on how to respond in real case scenarios they are likely to face during the course of their duties. Currently, unconscious bias training is being rolled out in the Garda College through an external facilitator. Courses that highlight the positive impacts of increased diversity and gender parity should be offered to all members and all training offered should include elements of diversity and gender analysis. The Commissioner's report to the Policing Authority November 2017¹⁹ indicated that the Steering group to embed the Code of Ethics in AGS has met regularly and that ethics training for senior management has held in November, with a view to further training in 2018.

Recommendations

- Implement a comprehensive training programme in AGS for new recruits and current members, including:
 - National roll-out of training in relation to gender equality for recruitment, promotion and supervision, including sexual harassment in workplace.
 - National roll-out of unconscious bias training, both to new recruits and to current serving members, with a particular focus on those involved in promotion and management.
 - Training on different forms of gender-based violence, including FGM and prostitution (see Section 2 below).
- Ensure anti-racism and intercultural training on Traveller and Roma Communities is a compulsory component of initial police training and CPD.
- Implement the recommendations of the Ethics Strategy currently under review.

¹⁹ Policing Authority, 3rd August 2017 PA/2017/419 'Re Measures taken by the Garda Síochána to implement recommendations of the Garda Inspectorate Report "Changing Policing in Ireland"'.

2. VIOLENCE AGAINST WOMEN

Violence against women (VAW) is the most significant crime impacting on women internationally and in Ireland. In 2014, the EU Fundamental Rights Agency²⁰ reported that 25% Irish women had experienced a form of physical and/or sexual violence since the age of fifteen, and 8% experience physical and/or sexual violence each year. 79% of Irish women who have experienced sexual or physical violence have never reported it to an official body²¹ and less than 3% of women students said they had ever reported their unwanted sexual experiences to AGS²². This reflects persisting stereotypical attitudes towards women and sexual violence in Irish society: 21% of Irish people think that there are understandable reasons for having sexual intercourse without consent, raping a woman; and 23% of Irish people believe women often make up or exaggerate claims of abuse or rape.²³ Recent reports of the Central Statistics Office show an increased level of reporting of sexual offences to the Gardaí - from 1,415 in 2006 to 2,549 in 2016²⁴ - but it is not clear whether the increase in the reporting is due to an increased level of crime or increased reporting of such crime. Domestic and sexual violence is a cause and consequence of gender discrimination and it needs to be located within a gender equality framework. Through being aware of how gender creates different roles for women and men, and by taking account of unequal power relations between women and men, AGS will be better able to address different vulnerabilities experienced by different groups of women. Ireland signed the Istanbul Convention in 2015, with ratification expected in 2018. The Convention defines gender-based violence against women as violence that is directed against a woman, because she is a woman, or that affects women disproportionately. AGS have committed to a wide-range of critical actions in the *Second National Strategy on Domestic, Sexual and Gender Based Violence*²⁵. Further, the *Criminal Justice (Victims of Crime) Act 2017* provides for the first time in Irish law that victims are legally entitled to the right to information, support and protection from AGS.

NWCI welcomed the establishment of the Garda National Protective Services Bureau (GNPSB) as a specialist team offering great potential to improve the prevention and investigation of VAW. Given the Bureau's responsibility for domestic, sexual violence, trafficking and child pornography, it is significantly under-resourced to carry out its wide remit effectively. The initial roll-out of the Divisional Garda Protective Units (DPSUs) is also welcome. NWCI knows from women throughout the country how difficult it is to report domestic, physical and sexual violence and the new DPSUs²⁶ are a significant positive step forward to changing that experience and supporting women through the criminal justice system. Having a dedicated service to ensure a consistent approach to domestic abuse and sexual crime will support women in reporting these crimes and having

²⁰ Fundamental Rights Agency (2014) *Violence Against Women: an EU-wide survey report*.

²¹ Fundamental Rights Agency (FRA) (2014) *Violence Against Women: an EU-wide survey report*.

²² Union of Students in Ireland (2013) *Say Something: A Study of Students' Experiences of Harassment, Stalking, Violence & Sexual Assault*. Dublin.

²³ Eurobarometer on Gender-based Violence 2016

²⁴ CSO - Crime - Recorded Crime Offences Recorded Crime Offences (Number) by Type of Offence and Year – Sexual Offences. <http://www.cso.ie/multiquicktables/quickTables.aspx?id=cja01>

²⁵ Department of Justice (2016) *Second National Strategy on Domestic, Sexual and Gender Based Violence*. <http://www.cosc.ie/en/COSC/Pages/WP08000096>

²⁶ Commitment in the Commissioner's *Modernisation and Renewal Programme 2016-2021* to establish in every Garda Division with specially trained staff in Protective Services Units (PSUs).

greater confidence in the services provided by AGS. However, it is clear that there continues to be insufficient Garda personnel at district level to meet the demand of DV incidences appropriately. Other recent developments which will support AGS investigation of VAW crimes and will improve victims' experience of the investigation and prosecution process include: the Garda Victims Service Office; new information leaflets for victims; and the introduction of new DV kits for officers called to collect evidence. While these initiatives are important, the introduction of further necessary reforms has been slow and the approach of Gardaí on the ground to VAW remains inconsistent.

Recommendations

- Implement recommendation 3.25 of the 2014 Report of the AGS Inspectorate, *Crime Investigation Report: The Inspectorate recommends that the AGS creates and implements minimum standards of investigation for key crime types, including, domestic violence and assault.*
- Adequately resource the GNPSB and the DPSUs to increase the capacity and effectiveness of the AGS. Increase resources so that each district has adequate personnel to respond to VAW.
- Evaluate phase 1 of the work of the GNPSB and DPSUs and engage in ongoing evaluation to capture learnings for future development and improvement.
- Complete roll-out of DPSUs and consider the establishment of district units in larger geographical areas.
- Develop an independent, visible identify for the DPSUs which can be promoted to the public.

Culture - victim-centred policing

The *Code of Ethics for the Garda Síochána* outlines the broad obligations of AGS to recognise and respect the dignity and equal human rights of all people. In light of the degrading and intrusive nature of domestic and sexual crimes, dignity is an especially important concern and extra efforts are required by gardaí to ensure that the dignity of these victims is protected. The *Criminal Justice (Victims of Crime) Act 2017* requires actions be implemented to ensure that women who do report violence are protected from secondary and repeat victimisation, intimidation and retaliation, including discriminatory stereotyping by professionals with responsibility for supporting them. The GNPSB as the specialist team investigating these crimes will have particular responsibility to ensure its practices and procedures implement this ethos. The provision of senior staffing structures in this division with related promotional opportunities, demonstrates AGS commitment to the seriousness of these crimes, and expresses clearly the centrality of this work to policing. NWCI welcomes this cultural shift of resourcing priorities.

Recommendations

- Appoint an Assistant Commissioner with responsibility for the Victims of Crime.
- Conduct ongoing reviews to ensure that services for victims meet the requirements

of the Criminal Justice (Victims of Crime) Act 2017 and the Victims Directive.

Policies - Domestic Abuse Intervention and Investigation of Sexual Crime

NWCI welcomed the 2017 AGS Domestic Abuse Intervention Policy (in particular the focus on call-takers, the safety of victims, the risks to children and the emphasis on supervision of gardaí) and the 2013 Investigation of Sexual Crime policies. Both policies recognise that inappropriate action by AGS members can confirm the aggressor's perception of invulnerability, leading to further incidents. NWCI welcomes the ethos of care and support both policies emphasise, requiring Garda to bring a trauma-informed perspective to their policing responsibilities. The acknowledgement of the impact of poor policing and the link to under-reporting of these crimes is welcomed.²⁷ Additional efforts must be made to ensure female victims from certain marginalized or disadvantaged groups, in particular minority ethnic groups including Traveller and Roma Communities, are not subjected to discriminatory behaviours and attitudes. The commitment to a victim-centred ethos requires a high degree of training and support to ensure individual officers have the required interpersonal and communicative skills (see Section below - Training related to VAW).

Recommendations

- Undertake periodic review, in consultation with NGOs, of the operation of the Domestic Abuse Intervention Policy and the Sexual Crimes Policy.
- Ensure all officers have necessary skills training to implement the victim-centred ethos outlined in these policies.
- The domestic abuse policy should be reviewed and amended once the Domestic Violence Bill 2017 passes into law, particularly in relation to a new criminal offence of coercive control.

Risk assessment and multiagency approach to protection

Leaving or trying to leave an abusive relationship is a very dangerous time for a woman. Women's Aid's femicide research over 20 years shows that 24% of victims were killed by a former partner and in an additional 15 cases the woman had expressed her intention to leave or the killer thought that she would end the relationship.²⁸ A system of risk assessment is urgently required to protect the lives and safety of women and children. NWCI welcomes the commitment by AGS in the *Second National Strategy on Domestic,*

²⁷ 'Inappropriate body language, remarks and a failure to show sensitivity and compassion to a victim can and has resulted in the withdrawal of genuine complaints'. Policy of An Garda Síochána on the investigation of Sexual crime, Crimes against children, Child welfare (2013).

²⁸ Women's Aid Press Release, 24th November 2017, 'Men's Violence is Killing Women - Femicide Watch 2017 Launched by Women's Aid'. <https://www.womensaid.ie/about/newsevents/news/2017/11/24/mens-violence-is-killing-women-femicide-watch-2017/>

*Sexual and Gender Based Violence*²⁹ to develop and implement a risk assessment matrix for all victims of DV and sexual crime. It is noteworthy that the Government action plan does not commit any other authorities to carrying out risk assessment, despite Article 51, Istanbul Convention calling for this to be done 'by all relevant authorities'. A comprehensive risk assessment mechanism will require close co-operation between AGS and other agencies, including TUSLA, NGOs and local authorities. It will also require appropriate and effective responses to meeting the identified safety risks to women.

Recommendations

- Establish a first and second phase risk assessment process for all DV incidents.
 - For cases identified as serious risk, identify multiagency approaches and resources to protect victims and to support the reporting of incidents.
- Engage in continuous evaluation of the risk assessment process. Include NGOs to identify any on-the-ground changes in the protection of women.

Management and supervision for VAW incidents

The quality of the response a woman receives from AGS is critical to her future contact and engagement. According to a Safe Ireland study³⁰ conducted February 2014-2016, the response of gardaí to domestic violence 'can be a lottery'. Gardaí were found to be reluctant to 'gather evidence, investigate cases and to prosecute without a domestic violence order' such as a barring or safety order. The 2014 Inspectorate Report found many cases are wrongly recorded as 'attention and complaint' incidents, rather than as crimes. It also identified that follow-up visits to victims as required by Garda policy do not always happen. Gardaí often treated victims differently depending on whether they already had a court protection order in place or not. NWCI fully agrees with the Inspectorate's 2014 assessment that 'the need to deal positively and appropriately with calls to DV must be supported by robust checking by supervisors. This includes ensuring that the initial investigation is thorough and that where possible, positive action is taken. In all of the UK services visited by the Inspectorate, there is a daily review of all DV cases by senior managers'³¹.

NWCI is aware of good practice related to VAW in some districts. For example, a new policing plan in north inner city Dublin to tackle incidents in the home will see DV reports treated as a priority.³² Domestic incidents will get immediate response by working units, with follow-up by specialised Gardaí.

Recommendations

- Develop management and supervisory processes to ensure that good practices in relation to VAW incidents are shared, evaluated and incorporated into the new

²⁹ Department of Justice (2016) *Second National Strategy on Domestic, Sexual and Gender Based Violence*. <http://www.cosc.ie/en/COSC/Pages/WP08000096>

³⁰ Safe Ireland, *In Search of Justice: Women and the Irish Legal System*, (March 2016), pg 4.

³¹ Garda Inspectorate (2014) *Crime Investigation Report*, part 6/43.

³² See, the Journal.ie, 'Gardaí make domestic abuse 'a priority' in new policing plan', (15 January 2017) <http://www.thejournal.ie/domestic-violence-priority-dublin-north-3185164-Jan2017/> (accessed 24/01/2018).

units.

- Ensure all DV incidents are reviewed at daily accountability meetings.
- Ensure that the requirement for follow-up visits following DV is recorded and supervised.

Increased powers to address DV incidents

The Domestic Violence Bill 2017, expected to be enacted in early-2018, will provide new powers to AGS in DV incidents, impacting on the application of the Garda Domestic Abuse Intervention Policy 2017. Further, the Criminal Justice (Istanbul Convention) Bill is listed as a priority piece of legislation for the spring/summer 2018 legislative programme and will give effect to the extra-territorial provisions in the Istanbul Convention. Article 49 of the Convention requires State parties to take the necessary measures to ensure that ‘investigations and judicial proceedings in relation to all forms of violence covered by the scope of this Convention are carried out without undue delay’ and to ‘ensure the effective investigation and prosecution of offences established in accordance with this Convention’. It is uncertain whether particular internal AGS protocols are in place at present to ensure the speedy or effective investigation of alleged offences relating to the forms of violence covered by the Istanbul Convention. The Government action plan for the *Second National Strategy*³³ contains a number of steps which would address the requirements of this Article. Article 50 of the Istanbul Convention requires State parties to take measures to ensure that law enforcement agencies respond to all forms of violence covered by the scope of the Convention promptly and appropriately, by offering adequate and immediate protection to victims, and act to prevent and protect against violence by employing preventive operational measures and collecting evidence. There are no specific statutory duties set down in this regard by Irish law at present, and we are unaware of what AGS protocols currently exist in relation to gender based and domestic violence. However, the Government action plan for the *Second National Strategy*³⁴ comprehensively deals with the obligations of this Article in a number of different sections.

Recommendations

- Implement the relevant AGS actions of the *Second National Strategy on Domestic, Sexual and Gender-Based Violence*.

³³ Action plan of the *Second National Strategy on Domestic, Sexual and Gender-Based Violence 2016 – 2021*, including: Action 2.500, which indicates that following every report of a domestic violence incident, the victim will personally meet with a member of An Garda Síochána; Action 2.800, which states that An Garda Síochána will implement recommendations contained in a 2014 Garda Inspectorate report relating to good investigative practices in domestic violence and sexual crimes; Actions 2.810 and 2.830, which proposes the establishment and training of Divisional Protective Services Units; Action 2.850, relating to the implementation of a formal review process for undetected sexual offences; Action 2.900, which notes that An Garda Síochána will develop a risk assessment matrix; Action 2.3400, which details various steps which An Garda Síochána will take to ensure “consistent and professional proactive responses to incidents of domestic and sexual abuse”; and Action 2.3600, which proposes that An Garda Síochána will focus on recidivists of domestic violence and sexual crime to prevent and detect crime.

³⁴ Action plan of the *Second National Strategy on Domestic, Sexual and Gender-Based Violence 2016 – 2021*. For example: Action 2.500 indicates that following every report of a domestic violence incident, the victim will personally meet with a member of An Garda Síochána; Action 2.800 states that An Garda Síochána will implement recommendations contained in a 2014 Garda Inspectorate report relating to good investigative practices in domestic violence and sexual crimes; and Action 2.3400 details various steps which An Garda Síochána will take to ensure “consistent and professional proactive responses to incidents of domestic and sexual abuse”.

- Review legislation to identify mechanisms where the powers of the AGS should be increased to protect victims and to support the reporting of incidents.
- Any Garda attending a DV incident should provide information to the victim on specialist services available in their local area, or with the victim's consent, to refer the victim to these services.

Domestic Homicide Reviews

Femicide is the most serious crime perpetrated against women in Ireland. According to research conducted by Women's Aid³⁵, since 1996 216 women have died violently in Ireland (an average of 10 women per year) and 16 children have died alongside their mothers. In total, 88% of women were killed by a man they knew.

In other jurisdictions, Domestic Homicide Reviews are systematic multi-agency reviews which are understood to be a route to improving both risk assessment and management, alongside identifying gaps in policy and practice. In 2016, AGS announced it would conduct an analysis of domestic related homicides over the period 2007-2016 to identify any trends and patterns that may exist. While this is a welcome development, there continues to be a need for an ongoing process for multi-agency Domestic Homicide Reviews.

Recommendation

- Establish a multi-agency Domestic Homicide Review mechanism (including support services and families) on a statutory basis and publish annual data.

The policing of prostitution and human trafficking

The GNPSB has responsibility for organised prostitution which is very welcome, given the proven inextricable links between prostitution and sex trafficking, and clear evidence that sex trafficking occurs overwhelmingly in the context of criminally organised prostitution. Individuals involved in prostitution are vulnerable and may be a potential victim of trafficking, a victim of other serious crimes such as physical and sexual assault and theft, or a potential witness against organised criminals. When engaging with those involved in prostitution, it is incumbent on Gardaí to keep their focus on the rights of each person as a victim, rather than have undue focus on their immigration status. Gardaí should also adhere to the 'non-punishment principle' as it applies to victims of trafficking specifically and which is enshrined in various European and international legal instruments. In relation to human trafficking and organised prostitution particularly, it is crucial to address the extent and national breadth of criminal operations, including technical work to 'follow the money' and online activity, alongside essential transnational police co-operation.

35 Women's Aid Ireland (Dec. 2017) *Femicide Watch 2017*.

<https://www.womensaid.ie/about/policy/publications/femicide-watch-2017-republic-of-ireland/>

Recommendations

- Provide training, in cooperation with NGOs, to frontline AGS members in taking a non-punitive approach to women/men involved in prostitution.
- Ensure that trafficking and organised prostitution operations identified at a local level are fed into national-level policing to address regional, national and transnational organised crime.
- Consider new legislative measures to provide AGS with greater ability for transnational cooperation with their counterparts in Europe and beyond.

Training related to violence against women

The Garda Inspectorate recommended improved training for gardaí on VAW, in conjunction with VAW victims and support services. The absence of regular training results in a lack of expertise and understanding to effectively respond to domestic and sexual violence in a consistent manner. Understandings of the complexities of VAW are constantly evolving and NWCI believes that specific attention should be paid to development and roll-out of training in trauma and in coercive control for AGS members.

Experience in the US³⁶ shows law enforcement is most effective in combating VAW when police officers and the relevant staff have been trained to identify, understand and address the mental and emotional consequences that stem from violence. Trauma can stem from an isolated incident, from repeated incidents over a lifetime, or from a pattern of ongoing violence. Adopting a trauma-informed approach to AGS practices is essential. The *Domestic Violence Bill 2017* is expected to become law in the first half of 2018. Once passed, it will introduce a new criminal offense of coercive control³⁷ which will cover not only physical DV but other forms of psychological abuse and coercive and controlling behaviour. Dedicated training on the new legislation and how coercion can impact on a victim's life is required to ensure a consistent, victim-centred approach to crimes involving coercive control.

Recommendations

- Fund and provide mandatory and high quality training on gender-based, domestic and sexual violence for members of AGS, in conjunction with specialist services and

³⁶ Domestic Preparedness, 26th October 2016. 'Cambridge Police Introduce First-of-Its-Kind Trauma Training for Officers' <https://www.domesticpreparedness.com/healthcare/cambridge-police-introduce-first-of-its-kind-trauma-training-for-officers/>

³⁷ The offence of coercive control has been recognised in UK legislation since 2015. However, concerns emerged there that it is not being used enough and has created an unhelpful hierarchy of harms, in part due to a lack of specialist training for police officers. What has emerged in particular is that when it comes to coercive control victims are not aware that being isolated from friends or family, having access to money and bank accounts restricted, or even having personal medical conditions revealed, is domestic abuse and, a criminal offence. Scotland is also about to introduce a new criminal offence concerning domestic violence but to avoid the pitfalls experienced in England, around 14,000 Police Scotland officers are to receive specialist training in preparation for a new domestic abuse crime coming into force in Scotland. The training is specifically designed to help officers to identify seemingly innocuous actions which are in fact part of a cycle of psychological abuse or coercive control.

experts from different sectors. Training to include:

- Trauma-informed care and coercive control
- The complex and inter-related nature of the specific needs of women victims of violence
- Address unconscious biases to help avoid stereotypical thinking in relation to groups of women with specific needs
- Media training
- Engage victims of VAW and support agencies in gardaí training and awareness programmes to improve AGS awareness of the particular needs of VAW victims.
 - Identify new technologies to deliver this training.

Mechanism for victims to feed into AGS learning culture

In August 2017, the Canadian Office of the Federal Ombudsman for Victims of Crime launched a national engagement process to hear from those with lived experiences of victimisation, victim service providers, victim advocacy organizations, and other victims' issues experts about how Canada could better support victims and survivors of crime.³⁸ One of the main points to emerge was that the police system needs to be more flexible and adaptable in engaging vulnerable victims such as children, older people, and persons with disabilities. The report also highlighted a pilot project in the UK in which victims were better informed about the justice process and of their rights, leading to an increase in both the number of witnesses that could testify and early convictions.

Recommendation

- Develop a process to ensure that victims' and support agencies experiences are consistently reflected in training programmes to improve AGS awareness of the particular needs of VAW victims.

Data collection and analysis

Accurate statistics are essential to plan, deliver and evaluate responses to crime. Data on VAW can be used as a tool for policy formulation and evaluation, for developing effective strategies to prevent VAW, to assess the adequacy of current service provision and to determine the quality of support provided to victims.³⁹ Perpetrator data and information on the times and locations of incidents of VAW can inform prevention efforts and support necessary practice change. Analysis of data over time and the monitoring of trends can be used to support AGS, and other relevant agencies, to gain additional necessary resources.

³⁸ See 'Getting fair outcomes for victims in Canada's criminal justice system' <http://www.victimfirst.gc.ca/res/pub/GFO-ORE/index.html> (Last accessed 15 January 2018)

³⁹ European Institute for Gender Equality (2016) *Administrative data collection on violence against women – good practices*.

A number of reports in recent years - from the Garda Inspectorate, UN Treaty bodies⁴⁰, NGOs providing VAW services in Ireland - have highlighted the need for better data collection in relation to VAW in the policing and justice system. The Istanbul Convention recognises the importance of data collection and research, with Article 11⁴¹ outlining minimum requirements.

The Government's *Second National Strategy on Domestic, Sexual and Gender-Based Violence 2016-2021* is committed to establishing a bottom line 'gold standard' of data collection and analysis by all agencies working in the area of domestic and sexual violence. The Strategy includes a number of actions in relation to data and disaggregation of data by gender, specific to AGS⁴² (in some case in tandem with other state agencies); however, there has been limited progress on these commitments to date. AGS's *Modernisation and Renewal Programme 2016-20* makes the improvement of data quality a priority. This includes commitments to centralisation of crime recording and classification in the Garda Information Services Centre (GISC), the development of new standards for crime definition and classification (in consultation with the CSO), modernisation of Garda Information Systems including PULSE, and use of effective data quality processes and procedures to generate accurate crime statistics and information. AGS are required to collect and record administrative data on VAW. The AGS Domestic Abuse Intervention Policy states: 'Supervisors are required to monitor all incidents of Domestic Abuse; to ensure that all such incidents are recorded appropriately on PULSE; and to ensure that all incidents are investigated'. The Annual Policing Plan for 2017 [2018 not currently available] committed to 'improve data quality within AGS' by establishing a Data Quality Unit within the Garda Information Services, ensuring all incidents are correctly classified and implementing Computed Aided Dispatch (CAD) to support the accurate recording of calls on the PULSE system. As noted in the Gardaí's 2016 Annual Report (2017 not currently available), the force's performance indicator to improve data quality, including changes to the PULSE system, was only 'partially achieved'.

The drive to improve data collection must reflect the difficulties experienced by particular groups of women in engaging with the Gardaí. For example, there are significant concerns with regards to Traveller and Roma victims of crime in terms of low levels of crime reporting and victim satisfaction. Members of these communities are often 'over-policed' in relation to certain situations and crimes and under-protected in other

⁴⁰ Human Rights Committee (2014) 'Concluding observations on the fourth periodic report of Ireland'.

https://www.ihrec.ie/download/pdf/un_hrc_concluding_observations_on_ireland_and_iccrp_24_july_2014.pdf

⁴¹ Article 11 (data collection and research) includes the requirements for Ireland as a State Party to: collect disaggregated relevant statistical data at regular intervals; support research in the field of all forms of violence; endeavour to conduct population -based surveys at regular intervals to assess the prevalence of and trends in all forms of violence.

⁴² Action 2.3500 AGS will develop its capacity to analyse data from Pulse and will gather evidence of good practice from other jurisdictions to inform the development of future policies in the areas of domestic violence intervention and the investigation of sexual crime.

Action 3.600 Establish a bottom line "gold standard" of data collection and analysis by all agencies working in the area(s) of domestic and sexual violence whereby all datasets are disaggregated by: Age of victim and perpetrator; Sex of victim and perpetrator; Relationship between victim and perpetrator; Ethnicity of victim and perpetrator; Any disabilities of victim and perpetrator.

Action 3.700 Implement the findings of the Expert Group on Crime Statistics in relation to the compilation of crime statistics by the CSO, relevant to domestic violence and sexual violence, when the Group completes its work.

Action 3.900 CSO will produce recorded crime statistics where a Modus Operandi of Domestic Violence has been indicated [with AGS]

situations. As a result, crimes, such as hate crime and domestic and sexual violence often go underreported.⁴³

Recommendation

- Implement the data recommendations of the 2014 Report of the AGS Inspectorate Crime Investigation Report⁴⁴ and the *Second National Strategy on Domestic, Sexual and Gender-Based Violence 2016-2021*⁴⁵.

VAW data gaps

Ireland does not have adequate data to give us a clear picture of the extent and depth of VAW, nor are there sufficient individuals in AGS to undertake data analysis. Gaps in available data within the policing and justice system include: the PULSE recording system does not lend itself to data analysis; it is impossible to determine the number of cases within the court system that are DV cases because DV does not have a specific criminal code in Ireland and may be prosecuted under a range of criminal statutes; data on breaches of Domestic Violence Orders are not broken down by gender, ethnicity, age or disability and does not indicate the relationship between perpetrator and victim; and official Irish crime statistics published by the CSO cannot be analysed or disaggregated by age, gender of victim and perpetrator, ethnic minority status or a range of other important indicators for sexual violence and harassment.

PULSE was designed as an administrative data *collection* system, rather than as a system for data *analysis*. As a result, it is not possible to extrapolate the depth of information required from PULSE. Further, PULSE cannot record specific areas of policing work, such as community activities, information provision and engagement with community groups.

⁴³ Pavee Point (Sept.2017) 'Submission 2018 Policing Priorities'.

⁴⁴ *2014 Report of the Garda Síochána Inspectorate, Crime Investigation Report*: Recommendation 3.27: The Inspectorate recommends that the Garda Síochána ensures a clear rationale is recorded as to why no PULSE incident number was created where CAD and paper records for calls suggest that a crime has taken place; Recommendation 3.28: The Inspectorate recommends that the Garda Síochána ensures that CAD incidents are not closed without a PULSE incident number or in cases where there are outstanding actions or outstanding suspects; Recommendation 3.29: The Inspectorate recommends that the Garda Síochána develop a broader range of CAD incident result codes that accurately record the type of incident.

⁴⁵ Department of Justice (Oct. 2017) - *Action Plan Second National Strategy on Domestic, Sexual and Gender-Based Violence 2016-2021*. Available at <http://www.cosc.ie/en/COSC/Pages/WP16000018>.

Recommendations

- In the short term, implement the commitments to improve data quality in AGS's *Modernisation and Renewal Programme 2016-20*.
 - Measure and compare the emergency calls for VAW received and those logged on PULSE.
- In the medium term develop a new data system for AGS that comprehensively collects data and which lends itself to data analysis and publication.
 - This data system must be able to measure and analyse all activities undertaken by Gardaí.
- Increase staffing to ensure adequate capacity for data collection and analysis.

Disaggregation of data by gender and ethnicity

Currently we cannot track the VAW experiences of different groups of women, for example how do migrant women, young women, or women with disabilities experience domestic and sexual abuse and what needs to be put in place to record their experiences appropriately? Such analysis requires qualitative data and research, some of which is currently being undertaken by NGOs but which needs state support. Qualitative analysis of the narrative data on VAW cases inputted into PULSE has the potential to provide key information on how VAW is being handled by AGS and to aid learning.

Recommendation

- In addition to the data collection and analysis system recommended above, establish a comprehensive *data collection process* to generate robust, reliable data on VAW crimes.
 - PULSE data and the data produced by the CSO should be disaggregated by age, gender, ethnicity and disability to better determine the categories of victims and types of crimes reported, prosecuted and convicted.

Recording of DV incidents

The 2014 Garda Inspectorate Report⁴⁶ found that DV calls were often not recorded correctly. Improvements have clearly been made through the central recording system GISC in Castlebar and the requirement for all incidents to be flagged if they relate to DV. However, there is a clear question as to whether PULSE can provide the data needed for effective analysis. Further, in 2015 and 2016⁴⁷ the CSO published reports identifying problems with the recording of crimes on PULSE and suspended publishing crime statistics. On each occasion, the recording (or not) of domestic (intimate partner) violence was of particular concern. In early 2017, the Garda Commissioner confirmed that a further

⁴⁶ Garda Inspectorate: Crime Investigation 2014

⁴⁷ Central Statistics Office: Review of the quality of crime statistics 2015, 2016

examination of data relating to homicide and incidents of domestic (intimate partner) violence was being undertaken, as there was significant lack of confidence in their 'robustness'⁴⁸. Media reporting in January 2018⁴⁹ indicates the CSO is conducting a detailed examination of the recording of domestic abuse incidents in PULSE and paper-based records across 2017 to determine if the data is reliable.

Recommendations

- All Gardaí and Courts' data should identify all crimes under the Non-Fatal Offences Against the Person Act and other relevant Acts that are carried out in an intimate relationship as DV crimes, and include the relationship between perpetrator and victim.
- Undertake qualitative data analysis of narrative information recorded in PULSE for VAW incidents and feed learnings into AGS training and practice.

Collation of data across policing and justice system

Underpinning the data and analysis gaps in the policing and justice system is the absence of shared analysis across different agencies to determine a holistic picture of how women are engaging with the policing and justice system and where effective and appropriate interventions should be developed.

Recommendations

- Develop a system of multiagency (AGS, TUSLA, Courts Service) collation of data into an annual VAW crime report.
- Develop a common identifier system for VAW crimes for use by AGS, Director of Public Prosecutions and the Courts Service that can feed into statistics gathered by the CSO. This identifier system should be capable of distinguishing all possible assault, harassment, false imprisonment, sexual violence, coercion and other offences.

⁴⁸ Irish Examiner, 13th May 2017, 'Gardaí's domestic violence stats 'not robust'.

<http://www.irishexaminer.com/breakingnews/ireland/Gardaís-domestic-violence-stats-not-robust-789520.html>

⁴⁹ Irish Examiner, 13th January 2018, 'CSO investigate quality of Pulse crime records'.

<http://www.irishexaminer.com/ireland/cso-investigate-quality-of-pulse-crime-records-465740.html>

3. CONCLUSION

NWCI welcomes the opportunity to respond to this consultation. We will continue to work with AGS, the Department of Justice and Equality and the Policing Authority to ensure that policing reform in Ireland reflects the need for increased participation of women within the force and to ensure AGS has the ability to investigate VAW crimes, protect victims, analyse incidents of these crimes and ultimately to prevent such crimes in Ireland.

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