October 2024

Submission to the National Strategy for Women and Girls









1. Introduction

About Women's Aid

Women's Aid is a national, feminist organisation working to prevent and address the impact of domestic violence and abuse (henceforth DVA) including coercive control, in Ireland since 1974. We do this by advocating, influencing, training, and campaigning for effective responses to reduce the scale and impact of DVA on women and children in Ireland and providing high quality, specialised, integrated, support services. More information on Women's Aid is available on our website www.womensaid.ie.

While our specific remit is DVA, we have a broader interest in gender equality, as gender discrimination and misogyny are the foundations of violence against women, of which DVA is but one form.

Prevalence of Domestic Violence and Abuse in Ireland

DVA is common in Ireland as evidenced by the following data:

- One in three women in Ireland who have been in a relationship have experienced psychological abuse by a partner¹
- 25% of women in Ireland experienced sexual violence by an intimate partner²
- 1 in 5 young women aged 18-25 in Ireland have been subjected to intimate relationship abuse with 51% of young women affected experienced the abuse under the age of 18³
- Since 1996, 267 women have been killed violently in the Republic of Ireland. Of the women that were killed 63% were killed in their own homes, 55% were killed by a partner or ex and almost 9 in 10 women knew their killer (of the resolved cases)⁴.

¹ Violence against Women: An EU Wide Survey, European Union Fundamental Rights Agency 2014 https://fra.europa.eu/en/publication/2014/violence-against-women-eu-wide-survey-main-results-report

² Sexual Violence Survey, CSO, 2022 https://www.cso.ie/en/releasesandpublications/ep/p-svsmr/sexualviolencesurvey2022mainresults/overallprevalence/

³ Women's Aid (2020) One in Five Young Women Suffer Intimate Relationship Abuse in Ireland, https://www.womensaid.ie/app/uploads/2023/04/One-in-Five-Youn-Women-Report-2020.pdf

⁴ Women's aid Femicide Watch 2024, https://www.womensaid.ie/get-informed/campaigns-and-partnerships/femicide-watch/





2. DSGBV as a priority for the new National Strategy for Women and Girls (NSWG)

Violence against women is internationally recognised as a both consequence of gender inequality and a barrier to gender equality. All forms of gender-based violence can impact on every facet of women's lives and therefore on their ability to participate equally in society. Where women are subjected to multiple, often intersecting, forms of violence and abuse, this ability is even further undermined.

As inequality and violence against women are linked, Women's Aid welcomes the inclusion of domestic, sexual and gender-based violence in the 6 strands envisaged for the new NSWG⁵ and recommends that Domestic, Sexual and Gender-based violence remains a priority. The NSWG should link in and support Zero Tolerance the Third National Strategy on DSGBV⁶ (henceforth Zero Tolerance), avoiding duplication and focusing instead on areas where Zero Tolerance is weak.

Recommendation 1

Women's Aid recommends that domestic, sexual and gender-based violence (DSGBV) should remain a top priority of the new NSWG Strategy. The DSGBV strand of the Strategy should:

- clearly link in and support the full implementation of the Zero Tolerance strategy, including provision of funding and resources, and ensuring that an intersectional focus is maintained
- focus on important areas missing in the Zero Strategy such as:
 - addressing the long-term housing needs of women and children escaping domestic violence or other forms of violence against women and girls (VAWG)
 - addressing online DSGBV/technology facilitated VAW, (including intimate image abuse), by preventing abuse, providing support and resources for survivors and holding platforms accountable

⁵ DCEDIY National Strategy on Women and Girls survey Research Online Q'aire (FINAL) Ipsos 23-039212

⁶ ZERO TOLERANCE Third National Strategy on Domestic, Sexual & Gender-Based Violence 2022-2026 https://www.gov.ie/en/publication/a43a9-third-national-strategy-on-domestic-sexual-and-gender-based-violence/



support the long-term continuation and expansion of the Women's Aid Too Into You project as an example of a successful initiative to help prevent and address intimate relationship abuse against young women, including online abuse.

- Women's Aid notes that the DCEDIY National Strategy for Women and Girls Survey suggested as actions for the DSGBV strand: improve access to refuge spaces and protect survivors against risk of homelessness⁷.
- Domestic violence is one of the main drivers of homelessness for women and children⁸.
- The Zero Tolerance Strategy has started to address the chronic lack of refuges for women and children escaping DVA, which is welcome and needs to be continued. However, providing additional refuge spaces alone will not address at all the issue of long-term housing for these families, nor is this issue specifically addressed in the current National Housing for All Strategy. In the absence of any strategy addressing long term housing needs for this vulnerable group, women and children remain in refuges for longer than needed, return to an abuser or move to unstable and inadequate premised or straight into homelessness.
- Currently victims of DVA face huge issues in securing long term housing:
 - there are huge waiting lists for social and local housing as well as administrative barriers preventing DVA victims accessing it, being prioritised or becoming sole tenants when the social housing was in the joint name of the survivor and the perpetrator of abuse
 - the housing crisis makes it hard for anybody to find suitable accommodation,
 even more so for women who in many cases have suffered economic abuse, have

⁷ DCEDIY National Strategy on Women and Girls survey Research Online Q'aire (FINAL) Ipsos 23-039212, page 5

⁸ Mayock P. and Neary F, 2021, Domestic Violence & Family Homelessness, Focus Ireland; https://www.focusireland.ie/wp-content/uploads/2021/12/Domestic-Violence-and-Family-Homelessness-Report_FINAL.pdf





little access to savings or the family estate and may have negative credit history due to their abuser's actions

- even when women and children are allowed to remain in the family home, they
 may not be able to keep up with mortgage payments or rent particularly in
 cases of non-payment of maintenance.
- Barriers for DVA victims to access social housing on a priority basis should be removed by legislation to ensure consistency across council areas. Programs to better support women and children to remain in their homes without the perpetrator, where safe, provide another option, which would also have the advantage of not removing them from their community and supports. Such programs have been successfully established in other jurisdictions⁹ and should be piloted in Ireland. The provision of mortgage support should also be considered.
- Women and girls from marginalised communities face additional barriers and/or
 have additional needs, in particular: disabled women, migrant women going through
 the International Protection and Asylum System, and Traveller and Roma women¹⁰
 subjected to DVA find it exceptionally hard to find alternative and appropriate longterm accommodation.
- The horrific exploitation of women and girls in so called "sex for rent" arrangements also need to be addressed as a form of gender-based violence preying on the most vulnerable women¹¹.
- Online DSGBV is an increasing problem, with sexist and misogynistic hate speech common on online platforms, which has huge detrimental impact on women and girls both online and offline¹². Online VAW falls within the scope of both the CEDAW Convention and the Istanbul Convention, and the new EU Directive on Violence

^{9 &}lt;a href="https://www.facs.nsw.gov.au/domestic-violence-1/services-and-support0/programs/staying-home-leaving-violence?SQ_VARIATION_568329=0">https://www.facs.nsw.gov.au/domestic-violence-1/services-and-support0/programs/staying-home-leaving-violence?SQ_VARIATION_568329=0

¹⁰ Pavee Point (2023) Submission to the Joint Oireachtas Committee on Justice, Equality and Defence on the issue of domestic violence. https://www.paveepoint.ie/wp-content/uploads/2023/12/12-July-Pavee-Point-Submission-to-the-Committee-on-domestic-violence-1.pdf

¹¹ NWCI, 2024, Sex for rent, An NWC Report on Sexual Exploitation and Sexual Harassment in the Rental Housing Market, https://www.nwci.ie/images/uploads/NWC Sex For Rent Research.pdf

¹² EIGE, 2022, Combating Cyber Violence against Women and Girls; https://eige.europa.eu/sites/default/files/documents/combating cyber violence against women and girls. pdf





against Women so there are clear international obligations to address this form of $\mathsf{DSGBV^{13}}$.

- Technology facilitated abuse within and outside of relationships is of great concern especially regarding the younger generations. Women's Aid research found that of the 1 in 5 young women who were subjected to intimate relationship abuse in Ireland, nearly half (47%) were targeted by their partners and ex-partners through online abuse¹⁴.
- The proposed Online Safety Code is inadequate and will not effectively protect women and girls.
- A fast, free, and enforceable mechanism to remove IIA and content promoting
 DSGBV from online platforms and social media and prevent its spreading is needed.
 Strong measures are also needed to make platforms and social media accountable
 for the harm caused by such content and from algorithms amplifying it.
- There needs to be increased awareness of intimate relationship abuse amongst young people and alternatives offered to unhealthy and controlling behaviours through evidence-based education and public awareness campaigns centered on gender equality. An example of a successful initiative focused on young women is Women's Aid's Too Into You project. This is focused on young people, in particular young women, aged 18-25. The project aims to teach young people about the difference between healthy and unhealthy relationships, the red flags of relationship abuse, and provide support at our dedicated website for young people www.toointoyou.ie.

¹³ Paragraph 20 and 30 (d) of CEDAW's General Recommendation no. 35; https://documents-dds-ny.un.org/doc/UNDOC/GEN/N17/231/54/PDF/N1723154.pdf?OpenElement: GREVIO (2021), General Recommendation No 1 on the digital dimension of violence against women, Council of Europe; https://rm.coe.int/grevio-rec-no-on-digital-violence-against-women/1680a49147

¹⁴ Women's Aid (2020) One in Five Young Women Suffer Intimate Relationship Abuse in Ireland, https://www.womensaid.ie/app/uploads/2023/04/One-in-Five-Youn-Women-Report-2020.pdf



3. Considering the specific experiences and needs of DSGBV survivors in the other suggested strands of the NSWG

As violence against women is very common any strands and actions in the NSWG will include VAW survivors. Many of the issues suggested for consideration in the new Strategy under other strands, while not specific to DVA survivors, are still relevant to and may have a disproportionate impact on them; it is essential that when deciding on actions and implementation on these issues the NSWG takes into consideration the specific needs and experiences of survivors of DVA and other forms of violence against women. These issues are not addressed in the Zero Tolerance Strategy which does not focus on long term impacts.

Recommendation 2

All suggested strands in the NSWG Strategy should consider survivors of DSGBV as a group with specific experiences and needs.

Suggestions are given below for each of the NSWG strands/priority areas.

Suggested strand: Socio-economic equality between women and men (e.g. gender pay gap, gender pension gap, paid family leave, maternity and paternity leave)

Recommendation 2.1

The Strategy should include measures to support the financial autonomy and recovery of women living with/escaping DVA, for example dedicated financial supports, enforcement of Maintenance, fair property settlements, financial management/debt support services, ensuring that women are not treated as dependent of their partners in the social protection system.

The domestic violence paid leave provision in the Work Life Balance Act 2023 must be reviewed within two years and consideration should be given to extend leave entitlement from 5 to 10 days.

Rationale

 Domestic violence has a huge impact on women's financial security, both during the relationship and after separation. Women experiencing domestic violence often





suffer economic abuse, which may include: the abuser controlling all the household's money, women not being allowed to work, having to give the abuser their wages or social security payments, abuser incurring debts in her name and destroying her credit rating. After separation the abuser often refuses to pay Maintenance, uses Family Court proceedings to deplete her resources, coerces her into unfair property settlements¹⁵. This has immediate and long-term consequences for women's financial security, including in the long term (home ownership, pension).

- Women in poverty are also more vulnerable to DVA¹⁶ and economic dependency makes it more difficult to leave the relationship
- Domestic violence has an impact on women's employment and productivity. Ireland
 has commenced Paid Domestic Violence leave in November 2023, by which victims
 of domestic abuse have a right to 5 days paid leave to access relevant support
 without losing pay. The Minister committed to a review of the Act within two years to
 consider extending the leave to 10 days¹⁷.

Suggested strand: Physical and mental health of women and girls (e.g. improve access to contraception, improve support for depression and anxiety, reduce smoking consumption).

Recommendation 2.2

The NSWG strand on health should include measures to address the long-term mental health needs of women survivor of DVA/VAW, such as provision of free or affordable counselling and long-term integrated interventions to address the comorbidity of substance use and domestic violence.

Women's Aid Maternity Outreach Service should be continued and extended.

^{15 &}lt;a href="https://eige.europa.eu/sites/default/files/documents/EIGE">https://eige.europa.eu/sites/default/files/documents/EIGE Factsheet EconomicViolence.pdf; Safe Ireland and NUI Galway, 2021 Assessing the Social and Economic Costs of DV: a summary report https://www.safeireland.ie/wp-content/uploads/Assessing-the-Social-and-Economic-Costs-of-DV-July2021.pdf

¹⁶ McManus, Sally. (2016). Joining the dots: The combined burden of violence, abuse and poverty in the lives of women.

https://www.researchgate.net/publication/308936884 Joining the dots The combined burden of violenc e abuse and poverty in the lives of women/link/57f8a40008ae280dd0bcd438/download

^{17 &}lt;a href="https://www.gov.ie/en/press-release/29922-minister-ogorman-announces-introduction-of-paid-leave-for-victims-of-domestic-violence/">https://www.gov.ie/en/press-release/29922-minister-ogorman-announces-introduction-of-paid-leave-for-victims-of-domestic-violence/



- Research has proved that DVA and other forms of violence against women have huge negative impacts on women's health, including both physical and mental health ¹⁸.
- The need for free or at least affordable long-term counselling to address the impact
 of domestic abuse has long been noted by Women's Aid and is not adequately
 addressed in Zero Tolerance.
- There are links between domestic abuse, mental health, trauma and substance abuse, which remain unaddressed. Women experiencing DVA are more likely to use substances, suffer from PTSD or depression, self-harm and suicidal ideation 19.
- The mental health impact of abuse can be severe, long lasting and life changing for young women 20. Of young women subjected to abuse by a partner or ex, 84% said that the abuse had a severe impact including loss of self-esteem, anxiety and depression, withdrawal from family and friends, giving up work or college and living in fear. 44% of young women subjected to intimate relationship abuse experienced suicidal thoughts as a result. 19% of young women had attempted suicide suicidal thoughts/attempting suicide. Abusive partners can prey on vulnerabilities and a controlling or violent partner can cause a huge setback at the beginning of their adult life.
- Studies show that pregnancy and post-partum are periods of heightened risk for women experiencing domestic abuse²¹. The Women's Aid Maternity Outreach Service provides support, information and advocacy to women who are experiencing

¹⁸ Brooklyn M. Mellar, MPH; Ladan Hashemi, PhD; Vanessa Selak, PhD; Pauline J. Gulliver, PhD; Tracey K.D. McIntosh, PhD; Janet L. Fanslow, PhD, 2023, Association Between Women's Exposure to Intimate Partner Violence and Self-reported Health Outcomes in New Zealand https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2801941

¹⁹ Dr Sonam Prakashini Banka et al. 2022, In Plain Sight: A Rapid Review of the International Literature and a National Estimate of the Prevalence of Women Who Use Substances and Experience Domestic Violence in Ireland,

https://www.saolproject.ie/ files/ugd/36f827 942dbb4ac5b9427ba7103a19c40447d0.pdf?index=true

²⁰ Women's Aid (2020) One in Five Young Women Suffer Intimate Relationship Abuse in Ireland,

https://www.womensaid.ie/app/uploads/2023/04/One-in-Five-Youn-Women-Report-2020.pdf

²¹ O'Brien Green, S. B. (2020). Domestic violence and pregnancy in Ireland: Women's routes to seeking help and safety. Trinity College Dublin. School of Social Work & Social Policy. Discipline of Social Studies.

https://www.tara.tcd.ie/bitstream/handle/2262/91289/Sioba%cc%81n%20O%27Brien%20Green%20TCD%20PhD%20Thesis%20Final%20January%202020.pdf?sequence=5&isAllowed=y





domestic abuse and who are receiving Maternity Care; in 2023 it supported 147 women at a very vulnerable time²².

Suggested strand: Visibility of women and girls (e.g. in sports, combatting gender stereotyping, encouraging women to study/work in STEM)

Recommendation 2.3

The Strategy should include measures to address the harms of pornography to children, women and girls and society in general as part of combatting gender stereotyping

- Women's Aid agrees that combatting gender stereotyping is necessary to achieve gender equality and to end violence against women. There is hardly a worse depiction of gender stereotypes than in pornography. Pornography shapes unequal and disrespectful sexual expectations, dehumanizes women and girls and depicts, normalizes, and promotes sexual violence:
 - o Almost 90% of scenes contain aggression.
 - o 1 in 8 titles shown to first time viewers (children) constitute sexual violence²³.
- Pornography is widely available, including to children and young people, and negatively shapes their understanding of sex and relationships, influencing expectations, normalising disrespectful sexual behaviour, and promoting misogynistic, and often abusive and violent models of sexual expectation.
- Most Irish people believe that pornography is too accessible to children, and that it contributes to gender inequality, coercion and sexual violence against women and girls. 81% of all respondents want age-appropriate sexuality and relationships education in all schools which includes a focus on the negative consequences of exposure to pornography²⁴.

²² Women's Aid Annual Impact Report 2023, https://www.womensaid.ie/app/uploads/2024/06/Womens-Aid-Annual-Report-2023.pdf

²³ Sexual violence as a sexual script in mainstream online pornography, Vera-Grey et al, The British Journal of Criminology, Volume 61, Issue 5, September 2021.

²⁴ Women's Aid, 2022, It's time to talk about porn Irish attitudes on the links between pornography, sexual development, gender inequality and violence against women and girls;





- The Zero Tolerance Strategy recognises this link and partly addresses it, especially in relation to young people²⁵ and in the SPHE curriculum development for Junior and Senior cycles only, while it is not clear if this will be included for younger ages.
- There is a need for stronger measures to address the harms of pornography including the risk of exposure/consumption by children and the harms to women and girls and society in general. Any measures or approaches must be 'porn critical' and not motivated to support 'porn literacy' which is not an effective means to promote genuinely healthy intimate relationships.

Suggested strand: Equal participation of women and men in leadership positions in politics, in public life and in the workplace (e.g. in the Oireachtas, on boards or in senior management of Irish companies, on sporting governing authorities)

Recommendation 2.4

The Strategy should include measures to address abuse in political and public life which prevents women from engaging therein, including an intersectionality lens to ensure inclusion of women belonging to minority groups.

- Women's Aid believes that to increase participation of women in public life, it is
 necessary to ensure that they can participate safely. Unfortunately, this does not
 always seem to be the case:
 - A 2024 Oireachtas report concludes that "abuse in political life is prevalent, problematic and targeted disproportionately at women and minority groups. Online abuse is intensifying and becoming normalised, fuelled by the anonymity provided by digital platforms, and often driven by misogyny, sexism, racism and intolerance." (bold added for emphasis)²⁶. The Report notes that abuse directed

https://www.womensaid.ie/assets/files/pdf/its time to talk about porn report womens aid november 20 22.pdf

²⁵ Zero Tolerance, op. cit, page 26. See also Actions 1.1.4 and 1.3.7 of the Implementation Plan

²⁶ Houses of the Oireachtas, 2024, Task Force on Safe Participation in Political Life Report, https://data.oireachtas.ie/ie/oireachtas/parliamentaryBusiness/other/2024-05-15_task-force-on-safe-participation-in-political-life_en.pdf





at women is often sexualised and includes sharing of fake intimate images. Moreover, certain contentious issues including immigration and women's rights seem to attract particularly high rates of abuse, with the risk that such topics are avoided. As well as impacting people personally, therefore abuse has also an impact on participation and democracy²⁷.

- Similar issues have been noted in relation to female journalists in Ireland, who
 are also in the public sphere and whose work is essential for democracy.²⁸
- Much of the abuse of women in political life is carried out online, therefore
 measures to address online DSGBV and measures to ensure swift removal of
 abusive content and to make platforms accountable would apply here too.

Suggested strand: Gender equality in law and policy (ensure data collection/research on gender equality issues).

Recommendation 2.5

The NSWG should support the Actions in the Zero Tolerance Strategy regarding data collection and the Domestic Abuse survey.

The NSWG should include actions to collect data and carry out research on the online abuse of women and girls

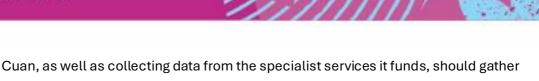
- Women's Aid agrees on the need to collect data on gender equality and carry out relevant research. In relation to DSGB specifically, we have repeatedly pointed out the huge gaps in data collection and publication.
- While actions related to data collection are included in the Zero Tolerance strategy and its Implementation Plans²⁹, (and indeed were included in the previous DSGBV strategy), very little progress has been achieved so far. Women's Aid believes that

²⁷ Ibidem

²⁸ Wheatley 2023. Social Media And Online Hostility: Experiences Of Women In Irish Journalism, https://www.nwci.ie/images/uploads/Social media and online hostility Experiences of women in Irish journalism.pdfolitical-life en.pdf

²⁹ Actions 4.2.1-4.2.2. of the Zero Tolerance 2024 Implementation Plan, https://www.gov.ie/en/publication/a43a9-third-national-strategy-on-domestic-sexual-and-gender-based-violence/





and publish in a centralised location all data from other relevant agencies and government departments.

- The CSO is tasked with carrying out a Domestic Abuse survey by 2028³⁰. This is long overdue and must proceed without delays and should include a question on age of when abuse was experienced to ensure the experiences of girls aged under 18 are captured.
- To our knowledge no data is being systematically collected nor research planned in Ireland on the huge and worsening issue of online DSGBV/technology facilitated abuse of women and girls, notwithstanding its great impact on women and girls both in the private and public sphere.

4. Effective strategy Implementation

Recommendation 3

Women's Aid supports the recommendation of the Center for Effective Services (CES) evaluation report on the last strategy and recommends these are applied in the drafting of the next NSWG.

We are especially keen that an intersectional lens is used in developing, implementing and evaluating the Strategy, as "Women and girls" is a large group, within which individuals and groups may suffer from additional, multiple and overlapping forms of discrimination.

We also agree that Implementation Plan and indicators need to be developed early, in parallel with the Strategy and in collaboration with civil society.

Rationale

• The recent CES evaluation report³¹ focuses on the implementation processes of 3 equality strategies, including the National Strategy for Women and Girls 2017-2020

³⁰ Action 4.2.4 of the Zero Tolerance 2024 Implementation Plan, above

³¹ CES, 2023, Realising the promise of national equality policy An evaluation of the processes of implementation of three national equality strategies, file:///home/utente/Desktop/263523 64481c7e-eeb8-46a0-b09f-8c27e3864978.pdf





and included useful insight for the drafting, implementation and monitoring of the new NSWG.

- The report stressed the need to better address intersectionality and notes the dearth
 of data on intersectionality as well as a lack of awareness of its importance and of
 established methodologies on how to incorporate an intersectional lens in National
 Strategies. The report notes the need to support marginalised groups' participation in
 initial consultation and subsequent implementation.
- The report also notes the need for stakeholder engagement throughout the lifetime of the strategy and not only its initial development. The role of committees needs to the carefully considered, in particular; the role of civil society representatives needs to be better defined and have more influence to move towards more collaborative arrangements or co-ownership of strategies. The report notes that while the strategies were meant to be "dynamic", in practice it was difficult to add actions or respond to emerging issues.
- It is also important to plan for the implementation of the Strategy from the beginning, together with relevant stakeholders, including civil society organisations. The report recommends that Strategies have a limited number of achievable actions, for which clear indicators can be designed from the beginning and that buy-in from relevant departments is ensured early on. Evaluation also needs to be planned for at the beginning, including data requirements. Adequate resources need to be secured for the Strategy to be successful.

Recommendation 4

Women's Aid recommends that the strategy is informed by the Sex, Gender and Sexuality (SGS) framework which requires focused analysis on the axis of sex, gender and sexuality as the foundation to understand the roots of DSGBV, with other intersectional factors added on to this matrix to ensure that interventions properly address DSGBV for all women and girls.

Rationale

Women's Aid believes that it is essential, as a foundational principle, for the Strategy
to clearly articulate the structural factors which both underpin gender inequality and
create an enabling environment for perpetrators of DSGBV.





- In this respect, Women's Aid supports the use of the Sex, Gender and Sexuality (SGS) framework to understand the nature and dynamics of DSGBV and inform any intervention. This model posits that dominant sex, gender, and sexuality (SGS) systems support hierarchies of sex, gender and sexuality in society which naturalise patterns of coercion and dominance, and that "root patterns of Domestic, Sexual and Gender-Based Violence lie in sexed, gendered, and sexualised rules and roles, entitlements, and expectations" 32.
- Therefore, the axis of sex, gender and sexuality requires focused and foundational
 analysis, with other intersectional factors (such as disability, ethnicity, race, religion,
 age, family status and civil status) then added on to this matrix so that all actions in
 the strategy ensure that they meet the needs of all women and girls accordingly.
- The use of this matrix as the primary location for understanding the dynamics of DSGBV allows for appropriate responses for both women and girls in vulnerable groups and those not in vulnerable groups³³.

ENDS

³² Safe Ireland, 2023, SAFE PRACTICE A Guide to Providing Domestic Violence Frontline Services, page xi, https://www.safeireland.ie/policy-publications/

³³ For more information on the SGSframework see Safe Ireland, above, Appendix 1