



AlcoholAction
Ireland

Submission on the Draft General Scheme of a DSGBV Agency Bill

Alcohol Action Ireland (AAI) is the national independent advocate for reducing alcohol harm. We campaign for the burden of alcohol harm to be lifted from the individual, community and State, and have a strong track record in effective advocacy, campaigning and policy research.

Alcohol Action Ireland, together with a pioneering group of founders, established 'Silent Voices' in 2019, an advocacy initiative to highlight the hidden harms of parental problem alcohol use (PPAU).

Our strategic plan, *Leading Change: a society free from alcohol harm*, establishes a vision for our future work across five strategic goals and supporting actions. Our goals: A childhood free from alcohol harm; services for all affected by alcohol harm and the establishment of a state-sponsored Office to lead on alcohol policy, embrace the specific actions required to advance the primary objectives of 'Silent Voices' as set out in this policy document.

When there is domestic violence in a home everyone living in that home is adversely affected. This submission focusses on the child victim of domestic violence. Alcohol Action Ireland (AAI) is the national advocate for reducing alcohol harm. Silent Voices is an initiative of AAI which aims to raise awareness of the issues arising from parental problem alcohol use and the hidden harms to children as a direct consequence.

We welcome the establishment of a new standalone State agency with responsibility for domestic, sexual and gender-based violence (DSGBV). We believe the Agency represents a unique opportunity to drive change in achieving the Government's strategic goal of Zero Tolerance; and in adhering to international obligations, national legislation and policy relevant to DSGBV.

We note that the Agency will coordinate, deliver, and monitor issues in relation to DSGBV and it is envisaged that it will take a whole of Government approach in collaboration with civil society organisations. The Agency must have the power to direct actions and interventions to support victims of violence. It must have critical powers to monitor the effectiveness of the measures it directs, and enforcement where data and information is required to carry out its statutory remit.

AAI has a significant and major interest in issues around DSGBV given the evidence from multiple jurisdictions (including Ireland) of the role of alcohol in such violence including the overlap between alcohol use, mental health issues and violence. Through the work of Silent Voices, it considers and has access to the lived experience of those growing up in homes with PPAU, which is more often than not accompanied by domestic violence. Both traumatic experiences are recognised internationally as adverse childhood experiences (ACES).

Children have rights. Under the United Nations Convention on the Rights of the Child, children have the right to survive, to be protected from harm and exploitation, to develop fully and to participate in decisions which affect their well-being. A child who experiences domestic violence is a victim in his/her own right. Today in Ireland this child currently has no access to support and is generally not on any professional's radar. The trauma of experiencing domestic violence in the 'supposedly safe place of home', causes significant trauma, impacts the child's emotions, behaviour, development, health and well-being, and future. There is no escape for the child victim. He/she is trapped in an unsafe environment. This trauma warrants immediate intervention if the adverse outcomes mentioned are to be mitigated.

AAI, with the input of the Silent Voices advisory group, wishes to make the following comments in relation to the new Agency, which must have the appropriate statutory powers to carry out all necessary actions to realise its remit and achieve zero tolerance of DSGBV:

There is increasing international understanding of the impact of trauma and ACEs in multiple areas of people's lives in which the State has a role. The Irish Government must begin to develop national thinking about the concept of trauma-informed and trauma-responsive services. In neighbouring jurisdictions such as Scotland and Wales, ACE-awareness is leading to better outcomes for children and families and for services across society. Ireland is behind in this regard and must catch up with what is growing at pace at grassroots level. An overarching guiding principle of being a trauma-informed body would ensure that the new DSGBV Agency sets a standard for all domestic abuse services that fall under its remit and would send a positive signal to the sector and indeed wider services such as mental health and treatment services. Furthermore:

1. The Agency must take a leading role in recognising the impact of domestic abuse on children. This adverse childhood experience can have lifelong impacts if children do not receive the support and early intervention they require.
2. The new Agency must collaborate with civil society/NGOs, including the participation of victims and survivors, on planning, implementation, and monitoring of DSGBV, including guidelines, protocols, resources, funding and training of professionals.
3. The Agency must have the power to collect 'gold standard' data from relevant public services, for example, from treatment services for problem substance use. This is particularly important for women in treatment, who are often victims of domestic abuse.
4. The Agency must undertake public information campaigns that highlight the damage domestic abuse can cause a child. This would assist in educating parents, professionals, and society at large about the lasting damage experiencing or witnessing domestic abuse can cause. Domestic violence is an enormously disturbing experience for a child who doesn't have a voice nor the language to describe the extent of the trauma experienced. Immediate support is vital but so is education. Children who experience this traumatic event must also be told that it is not acceptable and not right for violence to be used against another person. If not informed this will be interpreted as 'normal' behaviour. A national campaign in our schools must be carried out given the extent of domestic violence, and indeed all aspects of DSGBV currently being experienced every day in Ireland.

5. The Agency must be a driving force for innovative and evidence-based programmes and supports for children and families. AAI, through its Silent Voices initiative, has been advocating for several years for Operation Encompass, (OE) an early intervention programme for children experiencing domestic abuse. The programme, developed and implemented across England and Wales, is now being rolled out across N. Ireland. It provides immediate support for children experiencing domestic violence, and who may not be on the radar of any State agency. Whilst the legal landscape is different across jurisdictions, children and their development and needs are not. Children must be front and centre of measures to support them when traumatic events like experiencing domestic violence occur. Currently, there appears to be little interaction between State agencies and An Garda Síochána when it comes to sharing crucial information that would help victims of domestic abuse. The recent report on the Intersection of the Criminal Justice, Family Law and Public Law Child Care Processes in relation to Domestic and Sexual Violence provides damning evidence of this failure. The absence of protocols to assist child and family victims of domestic violence is an appalling indictment. We believe that the OE programme could be implemented in Ireland now with an information sharing Protocol between Gardai and schools on a consent basis (as a temporary measure) and this could be trialed in a pilot area without further delay. A similar approach was used in Northern Ireland prior to OE being fully implemented there. Our children warrant the support of this early intervention support to protect their development, health and well-being.

6. Preventative work must become more the norm than the exception. Lack of information sharing between agencies that deal with children and families impedes preventative measures. People experiencing domestic abuse are likely to go to a GP, or substance use service. All professionals therefore need to be mindful that domestic abuse could be an issue that needs to be asked about. For example, in 2013, the WHO released clinical and policy guidelines for GPs responding to intimate partner violence and sexual violence. AAI believes that the Agency could and should drive innovative cross sectoral work as this issue is one that intersects with many others, not least substance use treatment, mental health, children's mental health and family support services. A comprehensive framework, established in law in Australia, the Maram Framework, means any organisations relevant to family violence risk must align their policies, procedures, practice guidance and tools to the MARAM Framework.