



Live Fear  
Free Helpline

0808 80 10 800

Llinell Gymorth  
Byw Heb Ofn

Providing confidential support  
and information on domestic  
abuse, sexual violence and  
violence against women in Wales

Darparu gwybodaeth a chellogaeth  
cyffwrddedig ynghylch trais domestig,  
trais rhywiol a thrais yn erbyn merched  
yn Nghymru



Cymorth i Ferched Cymru  
Welsh Women's Aid

Rhoi Merched a Phlant yn Gyntaf  
Putting Women & Children First

## Welsh Government consultation: Termination of pregnancy provision for women from Northern Ireland

Date of issue: 12 January 2018

Action required: Responses by 09 February 2018

### Consultation Response Form

Your name: Hilary Watson, Policy and Research Officer

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### About Welsh Women's Aid

Welsh Women's Aid is the umbrella membership organisation in Wales that supports and provides national representation for 24 independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (our membership of specialist services).<sup>i</sup> These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors. This includes advising and supporting commissioners and strategic leads in their development of VAWDASV needs assessments and strategic plans, promoting evidence for innovative new service models, and supporting research into the prevention of abuse.

Some of the many umbrella services we deliver for members include facilitating the involvement of member services' in relevant policy, legislative and strategy developments and encouraging co-production in service development; providing advice and information on the development and delivery of promising practice in the sector; providing support with policy and practice matters, and regional and national data analysis reports to support local needs assessments, strategy and commissioning developments.

We also deliver direct services including the Welsh Government funded Live Fear Free Helpline; a National Training Service; the national Children Matter programme of work which, for example, supports local services to help children and young people affected by abuse and to deliver preventative Safety, Trust and Respect (STAR) programmes across Wales, and refuge and advocacy services in Colwyn Bay and Wrexham. We are piloting the Survivors Empowering and Educating

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Registered Charity Number: 1140962



Llywodraeth Cymru  
Welsh Government



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Services (SEEdS) project, which is empowering survivors of violence and abuse to collectively influence and inform services and commissioning frameworks, and help change attitudes.

We also deliver the Wales National Quality Service Standards, a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found here: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)

Welsh Women's Aid fully supports the Welsh Government's commitment to publicly and financially support – through NHS Wales – the human rights of women and girls from Northern Ireland to have control over their own bodies and to seek safe and legal medical services in relation to the termination of pregnancy.<sup>1</sup> Last year marked the fiftieth anniversary of the UK's Abortion Act 1967, an Act that does not apply in Northern Ireland. For too long, the women in the Northern Ireland have had to leave their home country in order to seek out a medically-safe abortion in other parts of the UK and Europe. The clandestine nature of this requirement has led to inaccurate data in relation to the number of abortions that have been performed on Northern Irish women. While there is some hope for the reform of outdated abortion-related practices in the Republic of Ireland in the upcoming referendum on the repeal of the 8<sup>th</sup> Amendment of the Constitution of the Republic of Ireland, this vote has no bearing on women in Northern Ireland. It therefore is timely and appropriate for NHS Wales to support women from Northern Ireland, who have no such vote.

Violence against women and girls is a cause and consequence of gender inequality in society. Equality cannot be achieved when half of society does not have control over their own bodies and reproductive health. Therefore, Welsh Women's Aid fully supports the rights of women from Northern Ireland to safely access the right to termination of pregnancy within Wales, as the ban on abortions remains in Northern Ireland.

Where legal medically-safe abortions are not available the physical and psychological wellbeing of women is not protected.<sup>2</sup> Not only are 'illegal' and unregulated abortions already taking place<sup>3</sup>, but women should never be forced by circumstance to carry to term a pregnancy that is unwanted or unsafe.<sup>4</sup> Furthermore, the fact that there is no remit for termination in the case of pregnancies as a result of rape, familial sexual abuse (incest) and fetal abnormality is abhorrent as well as being

<sup>1</sup> Amnesty International, 'United Kingdom: Northern Ireland: Barriers to Accessing Abortion Services', *Amnesty International*, 2015, <https://www.amnesty.org/download/Documents/EUR4510572015ENGLISH.pdf>, (accessed 18<sup>th</sup> January 2018).

<sup>2</sup> Ibid.

<sup>3</sup> While indicative figures of how many clandestine abortions are taking places in Northern Ireland are hard to come by, it is thought that the decrease in Northern Irish women seeking abortions in the UK (and primarily England in the below article) is due to an increased number of women illegally importing abortion tablets from abroad. Due to the illegality and stigma attached, many who seek abortions are doing so without medical information and in secret, often not even telling friends or family, which is gravely concerning in terms of their physical and mental well being.

A. Gentleman, 'Abortion figures prompt fresh calls for reform of Northern Irish law'. *The Guardian*, 13 June 2017, <https://www.theguardian.com/uk-news/2017/jun/13/abortion-figures-prompt-fresh-calls-for-reform-of-northern-irish-law>, (accessed 18<sup>th</sup> January 2018).

<sup>4</sup> Amnesty International, 'United Kingdom: Northern Ireland: Barriers to Accessing Abortion Services', *Amnesty International*, 2015, <https://www.amnesty.org/download/Documents/EUR4510572015ENGLISH.pdf>, (accessed 18<sup>th</sup> January 2018).





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physically and psychologically damaging to the woman. Forced pregnancy and abuse that results in pregnancy is a recognised as a form of violence against women and girls in the United Nations definition.<sup>5</sup>

While the rights of women in Northern Ireland are unjust and unequal to those of women in Wales and the rest of the UK, it is appropriate and correct for the governments of Wales, Scotland and the UK to enable UK citizens to receive access to fully funded termination of pregnancy. Welsh Government must also assess whether there will be fair and equal rights of access to the NHS in Wales amongst Northern Irish women, with regards to socioeconomic constraints and the additional costs of travel and accommodation.<sup>6</sup> Welsh Women's Aid would urge the Welsh Government to also consider resourcing more than just direct NHS Wales costs associated with termination of pregnancy, such as needs-based travel grants or travel subsidies to broaden the demographic of Northern Irish women who could afford to benefit from the Welsh Government's support.

All support for Northern Irish women to access termination of pregnancy should also be put into the context of the current state of abortion provision in Wales today, which is in need of improvement. Assembly Member Jenny Rathbone stated in the Senedd on 16<sup>th</sup> January 2018, that many women in Wales are having their access to abortion artificially delayed, as they are having to see the GP before they can access gynecological services, and many are paying £600 themselves to access timely gynecological services because they have had to use private clinics. Delays can also lead to the need for surgical abortions because it is too late for less invasive medical termination. Access to abortion requires further financial investment across Wales, so that all women can receive excellent and time-appropriate support. It is not enough for Welsh Government to merely permit Northern Irish women to access these services, it is absolutely essential that additional funding supports an increased demand on services, while also addressing the short-falls in current provision.

**Welsh Women's Aid recommends that the Welsh Government:**

1. Supports women from Northern Ireland to access termination of pregnancy services in Wales.
2. Resources associated costs of offering this provision, including grants for travel and accommodation costs for Northern Irish Women receiving this service.
3. Invest to improve access and provision for all women accessing termination of pregnancy services from NHS Wales.

<sup>5</sup> <http://www.un.org/womenwatch/daw/beijing/platform/violence.htm>.

<sup>6</sup> Amnesty International, 'United Kingdom: Northern Ireland: Barriers to Accessing Abortion Services', *Amnesty International*, 2015, <https://www.amnesty.org/download/Documents/EUR4510572015ENGLISH.pdf>, (accessed 18<sup>th</sup> January 2018).





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*If you have any comments or questions about this consultation, please don't hesitate to get in touch with:*

**Hilary Watson – Policy and Research Officer**

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<sup>i</sup> Our membership of 24 third sector violence against women, domestic abuse and sexual violence specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated includes: Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Clwyd Alyn Housing Association (CAHA) Women's Aid, Stepping Stones, New Pathways, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU), Glyndwr Women's Aid, Gorwel (Grwp Cynefin), Montgomeryshire Family Crisis Centre, Newport Women's Aid, North Denbighshire Domestic Abuse Service, Port Talbot & Afan Women's Aid, RCT Women's Aid, Safer Wales (including Dyn Project), Swansea Women's Aid, Threshold (formerly Llanelli Women's Aid), West Wales Domestic Abuse Service and Rape; and Sexual Assault Centre North Wales.

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