

22 March 2023

Victims Support Division

Room A4.03

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Email: DSAStrategyConsultation@justice-ni.gov.uk

Ref: Domestic and Sexual Abuse Strategy 2023-2030

Mid Ulster District Council would like to take this opportunity to put forward its views in relation to the proposals detailed in the above-mentioned consultation. Each of the four pillars identified in the consultation document are examined in turn below:

Pillar 1: Partnership

The Council welcomes the joint partnership working between the Departments of Justice and Health in relation to the development of this draft strategy. It is important that Domestic and Sexual Abuse continues to be recognised as having a crosscutting societal impact that requires a joint approach. Co-ordinated responses underpinned by effective governance and community engagement seems to be the most proactive way to ensure that victim's/survivor's voices can be heard.

Pillar 2: Prevention

Mid Ulster District Council also welcomes that prevention of Domestic and Sexual Abuse forms a key part of the strategy. Awareness raising and challenging attitudes and behaviours can lead to much more positive outcomes for individuals who are victims or potential victims of domestic and sexual abuse and as well as being associated with improved outcomes for their loved ones. The Council also support the role given to community engagement. This will ensure that challenging behaviour can and should be addressed at the earliest opportunity and that domestic and sexual abuse should be identified and responded to as early as possible.

Pillar 3: Support

The Council supports the inclusive nature of the draft Strategy and encourages raising awareness of the fact that Domestic and Sexual Abuse victims/survivors can be of any gender, sexual orientation, age, ethnicity or religion. Consequently, the support that is offered to help victims/survivors of Domestic and Sexual Abuse to rebuild their lives needs to be inclusive. The prioritisation of support for children is also welcomed.

The Council also recognises that the workplace has a role to play in the provision of support to victims/survivors of Domestic and Sexual Abuse. While people can remove themselves from unsafe home environments, the predictability of workplace attendance and open locations can prove a vulnerability for individuals who have left unsafe home environments. The provision of training and awareness raising in relation to this aspect of support provision would be welcomed by the Council to ensure your staff feel safe and supported in the workplace. This area of support is particularly important since access to stable employment can be imperative to rebuilding financial security for victims/survivors.

Mid Ulster District Council area is vastly rural, as such the Council commends the strategy examining the contrast between Domestic and Sexual Abuse in urban and rural and recognising that support solutions employed in urban areas may not work in rural areas and that alternatives should be considered.

Overall, the support outlined in the draft strategy seems to be of a comprehensive and practical nature which the Council fully supports. Clear pathways to support are critical for victims and survivors to be able to regain confidence and rebuild their lives in the knowledge that they are safe and supported.

Pillar 4: Justice

The involvement of the Department of Justice in the development and delivery of this draft strategy is very much welcomed by the Council. To successfully address and reduce the levels of Domestic and Sexual Abuse in Northern Ireland a joint approach to tackle the causes and effect is mostly definitely required.

It is particularly important that justice takes a modern perspective in relation to what technical devices and methods that perpetrators use in relation to online abuse including; stalking, coercive control, trolling etc. The digital era has created additional platforms and opportunities for abuse to be perpetrated. These opportunities are being taken advantage of on a significant scale. Sentencing appropriate to the impact of online abuse by the Justice system will act as a deterrent and hopefully provide confidence to victims and survivors to be able to have a digital presence without fear of negative repercussions for them.

With regard to delivering justice overall, it is imperative that individuals who are abusive are held to account and that they receive effective justices' responses that act as a deterrent to repeat offences. Without appropriate and effective justices' response to domestic and sexual abuse, victims and survivors will continue to believe that reporting instances of abuse is not worthwhile. This situation provides continued opportunity to perpetrators to continue to carry out reprehensible offences.

The Council believes that current levels of Domestic and Sexual Abuse in Northern Ireland is completely unacceptable and hopes that the finalisation and implementation of this strategy goes a long way to addressing the current extremely concerning levels of Domestic and Sexual Abuse in Northern Ireland. Overall, the Council is fully supportive of what this draft strategy aims to achieve, particularly the comprehensive preventative measures and clear pathways of support for victims and survivors of domestic and sexual abuse.

Yours sincerely

Cllr Córa Corry

Mid Ulster District Council Chair



22 March 2023

Southern Health & Social Care Trust-Trust Headquarters

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Ref: Provision of Emergency General Surgery in the Southern Health & Social Care Trust

Mid Ulster District Council would like to take this opportunity to put forward its views in relation to the proposals by the Southern Health and Social Care Trust's General Surgery Team to centralise emergency general surgery to Craigavon Area Hospital (CAH). Overall, Mid Ulster District Council is extremely concerned in relation to the overall impact of the centralisation of emergency general surgery to Craigavon Area Hospital. The basis of this concern is the additional pressures that will be placed on CAH as a result of the centralisation of emergency surgical procedures and that it could eventually lead to an overall downgrade of Daisy Hill Hospital.

The Council notes that the proposed and piloted changes to Emergency General Surgery in the Southern Health & Social Care Trust seem to generally follow the principles of the Bengoa Report (2015) by fundamentally changing how services are delivered. However, crucially other recommendations within the Bengoa report, such as increased GP recruitment etc are not currently being implemented. This leads to a failure to address the knock-on needs of patients following the fundamental changes proposed. Overall, it is evident that the provision of services in one health care field (GP crisis for example) impacts significantly on the delivery of services in another, so attempting to shore up problems in service delivery by applying a sticking plaster to one service at a time will not solve the overall health care crisis we are currently facing.

In recent years staffing and bed shortages and an overflowing Emergency Department have become commonplace at CAH. While this does not relate directly to the provision of emergency general surgery on the site, simple access issues such as parking and waiting areas can become extremely overcrowded when a service becomes centralised to a site that is already nearing it's overall capacity. As such the Council would recommend direct investment into waiting and parking areas to alleviate patient concerns. This is particularly important when consideration of the additional travel time that will be experienced by some patients as a result of the proposed centralisation.

The Council understands that there is an across-the-board issue with attracting staff into all areas of health provision and as such would encourage the Trust to examine long-term recruitment strategies, possibly including incentives to attract new recruits as well as retaining experienced medical staff. The Council would also seek clarity in what is being done to retain experienced staff and would recommend a review of the banding process for surgical nursing staff who unlike other areas of nursing and midwifery lack the opportunity to progress in the current pay banding system.

Furthermore, this significant change in the location of Emergency General Surgery within the Southern Trust should not be considered in isolation from what is being reduced and downgraded in other Trust areas. The proposed removal of Emergency General Surgery from the South West Acute Hospital in Enniskillen is likely also to negatively impact on residents of the Mid Ulster District Council area. Therefore, the Council would seek clarity on whether or not the proposed changes at South West Acute Hospital have been factored into CAH's capacity, given that CAH surgical serves not only the Southern Trust but parts of the Western Trust as well.

Finally, while the Council does have serious concerns in relation to the proposals set out in this consultation, the Council does welcome elements of the consultation document proposals including the tackling of elective surgery waiting lists in Daisy Hill Hospital and that Consultants will still be available to travel to Daisy Hill Hospital if required as part of contingency arrangements. It is also useful to be aware that lessons have been learned during the yearlong piloting period that was implemented in February 2022.

In conclusion, the Council is concerned that the removal of Emergency General Surgery could be the beginning of an overall downgrade of Daisy Hill Hospital. The Council would strongly advocate for this not to be the case. The Council welcomes that while regrettably it is likely that emergency surgical procedures will no longer take place in Daisy Hill Hospital, that it will remain a regional centre for elective surgery and that the Emergency Department will not be impacted upon. The Council would strongly urge the Trust to ensure that this remains the case and to also

commence an u	upgrade of facilities	at CAH as	soon as it	practicable to	enable t	the site
to cope with the	e additional usage.					

Yours sincerely

Cllr Córa Corry

Mid Ulster District Council Chair