



Ending domestic abuse

Introduction to SafeLives DA Bill Consultation Response

31st May 2018

About SafeLives

We are a national charity dedicated to ending domestic abuse, for good. We combine insight from services, survivors and statistics to support people to become safe, well and rebuild their lives. Since 2005, SafeLives has worked with organisations across the country to transform the response to domestic abuse. Last year over 60,000 victims, and many more children, received co-ordinated support to become and stay safe through interventions pioneered by SafeLives and our partners.

Introduction

SafeLives welcomes the Government's continued commitment to supporting victims and survivors of domestic abuse, and their children, through its legislative and non-legislative programme of reforms. We're well into the 21st century but it's still common for women to be fleeing their home with their children and a bin bag full of their belongings. It's even more common for women to stay, living with abuse for many years. The Government is opening up a national conversation about abuse - let's really have that conversation, not settling for piecemeal solutions but determinedly pursuing change in our thinking and our actions.

This means shining a light on things we still don't want to acknowledge; namely what goes on in our most personal, intimate relationships, often behind closed doors. Talking about the fact that if you're a teenager, disabled, in a same sex relationship or from an ethnic minority, you're less likely to get support and less likely to get justice. That if you're a wealthy white woman in the home counties, people still say it couldn't happen to you.

Domestic abuse is an endemic part of British society. A truly ambitious goal would be that all victims and survivors, no matter what front door they live behind, can have a safe relationship and home. What it will take to achieve this is i) comprehensive support for all victims/survivors, whether they seek it out at school, work, hospital, their community or elsewhere ii) relentless focus on understanding not 'why she doesn't leave', but 'why he doesn't stop', creating solutions that change or constrain harmful behaviour iii) support for children and young people that recognises the particular risks to them developing safe and well.

In recent years, an increasing number of victims and families at risk from abuse have been identified by non-police agencies such as health and children's social services. But still, far too many families are only getting help when the abuse reaches crisis point and the police are called – and not every family gets the right help then. There are likely to be many more victims and families in contact with other statutory agencies, but they are not identified as living with domestic abuse. There is considerable potential in locating domestic abuse specialists in mainstream services, like hospitals. Programmes in GP surgeries and advice agencies have shown that it is possible to significantly increase identification. And these programmes may also reach groups of victims and families who are different to – and in some cases, more vulnerable than – those identified by other routes. As HMIC rightly put it back in 2014, we have to make domestic abuse everybody's business. In 2018, that remains a work in progress.

Survivor voices tell the truest, most immediate and most compelling story of domestic abuse. In preparing for our engagement with the proposed Bill, we have extended the work we do daily with victims and survivors, creating Every Story Matters¹ so that as many people as possible, from those who lived with abuse as children, to those who have managed to leave it behind, to those still experiencing it, could raise their voices and say, in their own words, what needs to change. Hundreds of people have responded to that call in just a few weeks, proving once and for all that survivors want to be heard. Our consultation response honours those voices but only begins a conversation. We haven't yet had chance to undertake proper qualitative assessment of the detail of what people told us in written word, audio and video. That process will continue as we prepare for the pre-legislative scrutiny for the Bill and its Parliamentary passage, likely to last for up to 18 months. In the meantime, we will seek an opportunity separate to our written response to present the voices of those c350 voices to relevant policy teams. People's own stories will create change.

As ever, we have also engaged in detail with multiple frontline domestic abuse practitioners, nearly 50 of whom responded to a separate survey for this consultation. Where appropriate, their views too are reflected in our responses. We have added this to data from our Insights and Marac datasets, practice findings from our frontline interventions including Drive, One Front Door and our Beacon Sites, research findings from our many reports and a wealth of evidence and practical expertise from a very wide range of colleagues from inside and beyond the DVA sector.

Our thanks to everyone who engaged with us as we pulled together this consultation response. In particular, thank you to anyone who said that they still feel afraid, but took part despite that fear. Every Story Matters included links to support services - we hope that everyone who needs a service will be able to reach for that, and get it.

¹ <https://everystorymatters.typeform.com/to/PMloFG>

SafeLives believes the Domestic Abuse Bill process can help us to get it right for survivors and their families in the following three ways:

1. The right resources at the right time to reduce missed opportunities and make individuals and families safe, sooner.

- Specialist support services need to be commissioned, well resourced, and working to high standards in every local area.
- Provision needs to include high quality outreach services which promote victims' resilience and to ensure every area has its full complement of Idvas - we need nearly 300 more to ensure every survivor at the highest risk of serious harm of murder is given the support they deserve.
- The role of agencies such as health, housing, children's services etc. needs to be enhanced through ensuring they ask about domestic abuse at the earliest possibility and follow through by referring survivors and perpetrators to specialist services.
- Specialist domestic abuse professionals need to be located in a greater number of health settings (IRISi, hospital and mental health Idvas).

2. To understand the whole picture for an individual and family, to give an effective response.

- Integrated One Front Door for referrals of all family members (and no wrong door for support, whether online or offline).
- Coordination of civil/family and criminal courts processes – one family, one judge (e.g. Family, Drug and Alcohol courts).
- Comprehensive DA Matters style training roll out for the Police and other statutory frontline professionals (particularly Children's and Adult Social Workers).
- Dedicated services for the 50%+ of survivors who currently don't plan to leave or separate, survivors with complex needs, and survivors with unmet or 'hidden' needs for example, 60 years plus, teenage, disabled, BME, LGBT+ survivors.
- Services for children living with domestic abuse and other ACEs including full provision of Ypvas - Young people's violence advisers and specialist children's workers. Relationship and Sex Education guidance needs to include a focus on

the nature of domestic abuse (with an input from specialist domestic abuse professionals) and roll-out in schools should include i) extra support for children who may disclose abuse ii) support for young people who worry they might be at risk of using violence and abuse.

3. To stop asking "Why doesn't she leave?" and start asking "Why doesn't he stop?"

- A radical cross-government strategy on boys and men who harm, taking in all forms of violence against women and girls and associated damage and offending, including harm that boys and men do to themselves.
- All 43 police force areas to establish a forum to coordinate a multi-agency response to high-harm perpetrators of abuse, adhering to nationally agreed and consistent standards so the perpetrator, the cause of the harm, is identified, monitored and held to account, including if they enter a new relationship.
- Quality assured one-to-one interventions with high-harm complex needs perpetrators - whose complex needs and engagement profiles are different from those suitable for more long-established structured group work programmes - as well as a roll-out of well-evidenced, Respect-accredited programmes for lower risk perpetrators.
- Action against the abusive parent when children's social care become involved in a family's life, with responsibility for change placed where it should be – with the person causing harm.
- We need to support survivors to stay safe in their own home through greater roll-out of Sanctuary schemes, specialist support such as Idvas and more varied supported housing options e.g. move-on, Housing First, a national housing reciprocal programme with regional centres, Shared Lives model, and safe houses, as well as refuge. Suitable housing options must also be available to make it a realistic option to remove the perpetrator from the home and house that person somewhere else, so the victim/survivor and any child(ren) can stay safely where they are.
- Criminal and civil justice sanctions which make clear that if you refuse to change your behaviour, there are consequences.

In relation to the main proposals in the DA Consultation, we would like to highlight the following:

Domestic Abuse Commissioner

SafeLives supports the creation of a new Domestic Abuse Commissioner, but only if they are given the access and platform they need to hold us all to account for radical change in our society. We would like to see the Commissioner given:

- A remit that focuses on domestic abuse, but which recognises and responds to the strong intersections between DA and other areas of risk, both those considered under the term 'VAWG' and also other forms of risk and disadvantage, such as mental ill-health and exposure to other forms of criminality such as CSE, CSA and wider violence against women and girls. It is confusing that the Home Office acknowledges the indivisible ties between all forms of VAWG through its 2016 strategy, but that the Commissioner will only be able to focus on domestic abuse.
- We also think it is vital that onward links are acknowledged; the co-relationship between mental ill-health and domestic abuse is evident in all good quality studies of the issue. We support the push to ensure local authorities and commissioners jointly agree VAWG strategies for local areas, carrying out needs assessments across different forms of VAWG and other intersecting issues, rather than segmenting strategies, and if the DA Commissioner is to make a difference, it sends a backwards signal for them to focus too rigidly on domestic abuse on its own. We suggest that while the title of this role should remain 'DA Commissioner' to give sufficient focus, they are given responsibility for monitoring local Commissioners' performance against the refreshed VAWG strategy, as well as the National Statement of Expectations for the Home Office, and MHCLG's commissioner priorities for domestic abuse. We also feel the person holding this post should attend the cross-Whitehall Directors Group on prevention of social harms.
- Appointment of the Commissioner by Parliamentary Committee – perhaps a joint committee of Women and Equalities and Home Affairs if committee time allows? It is important that the Commissioner feels accountable to Parliament rather than to the Government so that they are independent and able to exercise their role without fear or favour. It will be important to understand why Kevin Hyland, held in high esteem, felt he couldn't continue in role as the Modern Slavery Commissioner, and to learn any lessons.
- The right resources and staff to fulfil the role. The numbers of domestic abuse victims sits just under 2 million a year which is significantly higher than the

number of trafficking victims, and yet the budget proposed for the Commissioner role is not proportionate to that of the Modern Slavery Commissioner. We would suggest that the budget needs to be increased to reflect the prevalence of domestic abuse in society (let alone the prevalence of other forms of violence against women and girls such as sexual abuse which are closely linked).

- A remit which covers not just adult victims/survivors of domestic abuse, but also children experiencing domestic abuse as they grow up, and young people in abusive relationships. We also would like to see the Commissioner have oversight of all levels of perpetrator provision – both by statutory, voluntary and private sector providers, to ensure it meets national standards and that gaps in provision are identified.
- The authority to receive Joint Targeted Area Inspection reports and be tasked with ensuring findings are acted upon, starting with the recommendations made in the 2017 JTAI report², working closely with the relevant inspectorates.

Wider cultural change

*'I believe very strongly that we should educate everybody: male, female, LGBT, all age groups and talk about it far more than we do.'*³

Domestic abuse won't stop because of legislation. Domestic abuse will only stop when our society embraces wider cultural change - from top to bottom. The Government has a huge opportunity to use its convening power to start a national conversation for a decade and more - doing for domestic abuse what previous Governments have achieved on smoking, AIDS, road safety, and more recently gay rights.

- Government controlled statutory services and Departments lead the way in raising awareness of domestic abuse by agreeing employee policies on domestic abuse and implementing stronger pathways to refer victims in the workplace for support. In particular we would like to see the NHS, the police and the Ministry of Defence demonstrate zero tolerance of abuse by members of their workforce and implement stronger policies for victims of domestic abuse.
- We would like to see the Department of Health and NHS England show strong leadership on the issue of domestic abuse and ensure they track NHS compliance with NICE Quality Standards.

² JTAI (2017) The multi-agency response to children living with domestic abuse Prevent, protect and repair

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/68067/1/JTAI_domestic_abuse_18_Sept_2017.pdf

³ Respondent to Every Story Matters, April-May 2018

- To accompany the introduction of the new Act, the Government should introduce a £5m public awareness campaign along the lines of 'Time to Change' in the mental health sector so that domestic abuse is taken from a private matter into the public domain. Survivors' voices and experiences should be at the heart of the campaign with public figures encouraged to talk about how domestic abuse has affected them and their families.
- Government contracting processes could encourage private sector employers to ensure they meet accredited standards of supporting domestic abuse victims and perpetrators in the workplace by requiring them as a condition of receiving business. Just as businesses have risen to the challenge of tackling modern slavery, they should be leaders in ensuring their staff can find support in their workplace when they are victims of domestic abuse. We support the call from the Employers Initiative on Domestic Abuse⁴ to introduce into the Domestic Abuse Bill a minimum entitlement of ten days' paid leave in any year to an employee experiencing domestic abuse. This must be paid leave (equivalent to annual leave and sick pay) with job protection. We also believe employers require a clear set of good practice standards to work towards, akin to the SafeLives Leading Lights standards applied to specialist services, and a concomitant monitoring process to check for continuous improvement.

We are pleased to have worked with many colleagues within and beyond the domestic abuse sector to prepare this response, and note the thoughtful submissions from many of those organisations, ranging from Women's Aid, to Action for Children, Galop, the PPMA, DAHA and others. Our own response is usefully read in conjunction with the one we have produced in partnership with colleagues at Respect and Social Finance, that comes from the Drive partnership.

⁴ Vodafone Foundation (2017) Domestic Violence and Abuse: Working together to transform responses in the workplace
https://www.vodafone.com/content/dam/vodafone-images/foundation/55376_Vodafone_domestic_violence_report_AW5_V2.pdf

