

## **Victims' Commissioner for England and Wales' response to the 'Transforming the Response to Domestic Abuse' government consultation**

### **INTRODUCTION**

The Government launched its consultation 'Transforming the Response to Domestic Abuse' on 8<sup>th</sup> March 2018 as a prelude to the Domestic Abuse Bill, announced by the Prime Minister in 2017. As the Victims' Commissioner for England and Wales I wish to make the following submission to the Secretary of State for Justice and Home Secretary in respect of this consultation.

Domestic abuse has devastating impacts which reverberate not just within families but across society as a whole. In pure monetary terms intimate violence is estimated to cost the country £23 billion a year, which includes costs to the state, economic costs and the human and emotional costs borne by the individual victim.

It is this human and emotional toll which drives me to press for change. We know that domestic abuse is hugely underreported, with only 20% of victims feeling able to report their abuse, so any statistics quoted about the impact of this dreadful crime are most likely woefully underestimating the problem.

The real challenge is to ensure that all victims of domestic abuse have the confidence to come forward and seek help. This is a colossal step for victims in a coercive and or a violent relationship. It takes tremendous courage. But when it does happen it is such a formidable turning point in the victim's recovery. We must therefore ensure that what is available to victims, when they are their most vulnerable, is "world class" support correctly funded by the state.

My remit is independent of government and my role is to promote the interests of victims and witnesses. Since the launch of the consultation I have collected evidence and testimony from victims/survivors, practitioners of domestic abuse, and representative groups. My submission has therefore been informed by the views and needs of those directly affected by this appalling crime and those who offer them professional support.

The recurring themes I have heard from people across the country, which you will see reflected in my submission, are that a) this must be a truly cross-government response and must not just be about legislation; b) we must be led by victims to ensure a trauma-led response; and c) a call to end victim blaming - we must see an end to 'fixing' the victim's vulnerability but rather hold perpetrators to account.

### **SUMMARY**

This consultation and the Domestic Abuse Bill have been a springboard to enable conversation during the consultations events I have held to inform this submission. However, what has become clear is that government proposals, whilst to be welcomed and supported, in some respects do not go far enough. I therefore have the following 14 recommendations, which are set out in detail in the following pages, and which I believe will have a transformative impact on victims of domestic abuse;

**RECOMMENDATION 1: For the Domestic Abuse commissioner to publish to Parliament an annual audit of domestic abuse service provision.**

**RECOMMENDATION 2: To make 3-year bidding cycles the norm when commissioning domestic abuse services.**

**RECOMMENDATION 3:** To extent the period of time public funds is made available to a victim under the Destitute Domestic Violence Concession to six months.

**RECOMMENDATION 4:** Presumption of shared parenting to be reversed where one parent has a conviction for domestic abuse.

**RECOMMENDATION 5:** Domestic abuse sentences to fall within the Unduly Lenient Sentence scheme.

**RECOMMENDATION 6:** IDVAs be given equal access to both family and criminal courts to provide victims with continuity of care and support.

**RECOMMENDATION 7:** Police and courts to make the presumption that a DAPO or DAPN be put in place in all cases of domestic abuse, unless the victim requests otherwise, which should also include the power of arrest.

**RECOMMENDATION 8:** Government review of penalties given by the courts when a perpetrator has a pattern of breaking protective orders.

**RECOMMENDATION 9:** High-risk offenders with a conviction to be placed on a Domestic Abuse Register.

**RECOMMENDATION 10:** All staff in family courts; CAFCASS; social work; health professionals; and all other front-line staff to receive regular, accredited, and mandatory domestic abuse awareness modules.

**RECOMMENDATION 11.** Implement a 'Kitemark' that victims can seek out and commissioners can use in tender specifications and contract evaluation.

**RECOMMENDATION 12:** Every school to have a designated domestic abuse lead and for domestic abuse to be part of the new PSHE curriculum from September 2019.

**RECOMMENDATION 13:** Introduction of 'Ending Intimate Violence Against Men and Boys' strategy.

**RECOMMENDATION 14.** Research into risk assessment methods and its impact on risk levels assigned to victims who are male and/or perpetrator is female.

## **FUNDING**

**RECOMMENDATION 1:** For the Domestic Abuse commissioner to publish to parliament an annual audit of domestic abuse service provision.

**RECOMMENDATION 2:** To make 3-year bidding cycles the norm when commissioning domestic abuse services.

**RECOMMENDATION 3:** To extent the period of time public funds is made available to a victim under the Destitute Domestic Violence Concession to six months.

When talking to practitioners, I am left in no doubt that their overriding concern is whether they have sufficient resource to provide the services required of them. I am left with a clear impression of many service providers trying to cope with substantial increases in demand for their services, with, at best, no additional resource. Many tell me that they are working more effectively and efficiently, with, for example, stronger partnerships and collaboration with other providers and agencies. This is to be welcomed, but on its own is not sufficient to keep pace with demand.

By launching a public consultation and making parliamentary time for this important Bill, there is a legitimate expectation that the government's very public determination to tackle the scourge of domestic abuse will lead in an uptake in victims coming forward to request support and assistance. The inevitable consequence of this uptake is an increase in demand for support services. I am calling on the **government to make an upfront commitment that it will be responsive to this demand and match it with the required level of funding.**

I note that the government commits that "no-one is turned away from the support that they need" and that this includes access to safe accommodation. However, Women's Aid tell me that 60% of total referrals to refuge were declined last year and they fear this will only get worse with the introduction of Universal Credit. Universal Credit, which, if implemented as currently planned, will mean that refuges will no longer be paid for via benefits and they will have to fight their corner for funding alongside all other 'short term supported housing' services.

I therefore request that the Government works alongside experts in the field before finalising any policy changes so to provide an evidence based impact assessment of the policy changes for domestic violence victims, and other vulnerable groups. There is considerable concern over the possible impact of the proposed changes and they need to be fully understood.

Turning no one away from the support they need is a laudable aim and the success of the current drive to improve our response to domestic abuse will be judged harshly if this does not become reality. I believe the absolute minimum baseline for refuge provision is the Council of Europe recommendation of one refuge place for a family per 10000 of the population. They also make clear recommendations around the provision of other services such as helplines and counselling, which again I see as the bare minimum we should judge ourselves against.

I look forward to seeing the results of the government's ongoing audit into domestic abuse services and future announcements on how they plan to put funding for these services on a sustainable footing. **I am recommending that this audit be an annual responsibility of the Domestic Abuse commissioner and for this audit be laid before Parliament.** An annual audit undertaken independently of Government will allow the fullest of public and political scrutiny and this is to be welcomed.

Support services and practitioners from all parts of the country have also expressed to me in the strongest terms the intolerable pressure they are placed under by the current cyclical bidding process.

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*"We wouldn't be here today if this was the model of funding from year dot."*  
*A local service provider*

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Many service providers are small local charities who have a big impact, but very small teams. They have explained to me that the current method of annual retendering for services and short term, relatively low value, projects is drawing resource away from them being able to provide frontline services. It also puts the services on a precarious footing not knowing whether they will be able to provide this service in 6 months-time or whether it will be awarded elsewhere.

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*"I have the trained staff. I have the materials. But I've had to stop running that project because the funding stream disappeared."*

*A local service provider*

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Whilst I understand the need for a value for money assessment, you currently have the CEOs of small charities bidding for multiple small pots of money to run a service which ultimately must be costing more in administration than the value of the total award. **I recommend all commissioners of services, including central and local government, look at other funding models for services**, for example formula based models or three-year bidding cycles to ensure service providers are not crossing their fingers from one bank statement to the next and have security of tenure.

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*"I can't compete against the big housing providers who have a whole bidding team to draw proposals together. They might be able to provide the bricks and mortar but what about the added value we can give these victims which don't lend themselves to bid pro-forma."*

*A refuge provider*

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The financial impact of domestic abuse on its victims should also not be underestimated. I have spoken to women who have spent tens of thousands of pounds just to escape their abuser. The government introduced new rules at the very end of last year to make it easier for victims of domestic abuse to claim Legal Aid. This follows the impact of the Legal Aid, Sentencing and Punishment of Offenders Act (LASPO) 2012, which meant that, according to one study in 2015, 37% of domestic abuse victims did not have any of the required evidence available to be able to claim Legal Aid.

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*"My mother left me £90,000 in her will after she died. That has all gone on legal fees and other costs of leaving my abusive husband."*

*A domestic abuse victim*

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I will be monitoring with interest to see if the relaxation on the rules for victims of domestic abuse begin to have an impact, including in applications for divorce, and numbers of victims having to

represent themselves. Often victims need immediate access to legal support and all too often I am hearing stories of having to wait for weeks or even months before their claims are processed.

In turn I have also met victims whose immigration status depends on them staying with their abusive partner. These victims have no automatic recourse to public funds. I would like to see better awareness of the Destitute Domestic Violence Concession, which gives victims financial breathing space while they apply for a right to settle in the UK in their own right. However, I believe the three-month grace period allowed by this scheme is unrealistically tight for a victim's immigration status to be resolved and does not appreciate the complexities of an abusive relationship whereby the perpetrator often prevents the victim access to their official paperwork such as proof of address and passports. **I therefore recommend this provision be extended to a minimum of six months, with the possibility in certain circumstances for this to be increased to 12 months.**

## CHILDREN

**RECOMMENDATION 4: Presumption of shared parenting to be reversed where one parent has a conviction for domestic abuse.**

**RECOMMENDATION 5: Domestic abuse sentences to be added to the Unduly Lenient Sentence scheme.**

The statistics are heart breaking; children who witness domestic abuse are three times more likely to become victims themselves later in life. I've also sat with mothers who are terrified that their teenage sons are going to become the perpetrators of the future.

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*"The children we see have often experienced bad parenting. Not through a lack of will from the mother but her priority has been to keep the children quiet so not to antagonise the perpetrator."*  
*A refuge provider*

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Too often we hear of children being used as pawns in an abusive relationship; as another tool in the perpetrators box, especially as a way of continuing their coercive control. Victims have spoken to me about how they are desperately trying to keep their children safe but are being forced to make them see their fathers by the courts. The victim is also having to maintain contact with their perpetrator, despite of restraining orders, to arrange visitation.

The NSPCC estimate that a third of children who witness domestic abuse are also subject to another form of child abuse; and witnessing domestic abuse is a form of child abuse in its own right. Domestic abuse has been found to be a factor in half of all serious case reviews and some research has shown it to be a factor in nearly all cases of filicide (Sidebotham, P. et al (2016) Pathways to harm, pathways to protection: a triennial analysis of serious case reviews 2011 to 2014: final report).

In the Family Courts there is a statutory presumption in favour of shared parenting, even in cases where there are allegations of domestic abuse. Wherever I have met victims across the country, I have been told of stories of how their abusive ex-partner has successfully secured access to children through the Family Courts. Through gaining access, there appears to be a pattern of perpetrators

seeking to maintain some control over their ex-partner either through the process of arranging visitations or through the child. I have met families where the children have been adamant that they do not wish to see the perpetrator and in some cases, the children hold a deep fear of them. To me it appears that the drive for shared parenting has been allowed to trump the interests of the child and common sense.

I appreciate that the family courts are often presented with two parents who give very different versions of events in acrimonious battles for custody. However, where one partner has a conviction for domestic abuse, the assumption must always be that the criminal court has reached the right verdict.

I believe that a conviction for any form of domestic abuse should negate the presumption of joint parenting. **That is why I am calling for the presumption of shared parenting to be reversed where one parent has a conviction for domestic abuse.** This reversal does not mean that no parent with a conviction can ever participate in the parenting of their child, but it does mean that in making such a decision, the court starts in a very different place. The wishes of the child will of course be taken into account, but against a backdrop of informed risk assessment given the domestic abuse setting, and not on the needs of a convicted parent.

I welcome the government proposal to make domestic abuse and its impact on children an aggravating factor in sentencing. I am also aware of the frustration of some victims and practitioners when they believe that the courts have handed down a lenient sentence - on occasions sentences that do not appear to be in line with sentencing guidelines. Yet there is means of challenging a sentencing decision. This needs to be addressed. **I therefore call for sentences for domestic abuse be made part of the Unduly Lenient Sentence scheme.**

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*"I would rather die or go into care."  
An 8-year-old who was being sent back to live with her  
father (the perpetrator)*

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## **RESPONSE OF COURTS AND JUDICIARY**

**RECOMMENDATION 6: IDVAs be given equal access to both family and criminal courts to provide victims with continuity of care and support.**

**RECOMMENDATION 7: Police and courts to make the presumption that a DAPO or DAPN be put in place in all cases of domestic abuse, unless the victim requests otherwise, which should also include the power of arrest.**

**RECOMMENDATION 8: Government review of penalties given by the courts when a perpetrator has a pattern of breaking protective orders.**

**RECOMMENDATION 9: High-risk offenders to be placed on a Domestic Abuse Register on conviction.**

I am heartened to see the progress the criminal justice system is making in recognising the complexities of domestic abuse, particularly around coercive control. This evolving understanding needs to be matched with a commitment to provide appropriate training and support for front-line staff so that they are able to provide support and to recognise the signs of coercive control in particular.

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*“The amount of evidence need to pursue a charge of coercive control is monumental.”*

*A serving police officer specialising in domestic abuse*

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When talking to both victims and practitioners, the family court is one area which has almost consistently come in for criticism. Whilst the criminal courts are still a long way off perfect, the family courts are light years behind in their treatment of victims of domestic abuse. For example, the fact that a victim can give evidence behind a screen in the criminal court but in the family court, despite a restraining order being in place, they can still be cross examined by the perpetrator. I therefore welcome the government’s prohibition of cross-examination of a victim by an unrepresented perpetrator in the criminal court. I am however concerned that there is still no such prohibition in the family courts, despite the commitment from government to rectify this situation.

The most recent study from Women’s Aid and Queen Mary University shows that nearly a quarter of domestic abuse victims are still allowed to be cross-examined by their perpetrator in the family court and 61% are offered no special measures. In reality, Parliamentary time is currently so tight that I fear many victims, especially where tactics such as ‘gaslighting’ are present, will continue to have to suffer continuation of their abuse in the family court room. I join Women’s Aid in calling for the bar on perpetrators cross-examining their victim to be enacted by the quickest available legislative vehicle. I also support Women’s Aid’s wider recommendation for an independent inquiry into the handling of domestic abuse cases by the family courts. Victims must be able to access a system which with them towards a safer future for their family and not one that adds to the abuse and anxiety of their situation.

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*“The judge said to me, ‘you don’t know your children, I do, and this is what’s going to happen to them.’”*

*A domestic abuse victim*

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I have previously called for a victims’ advocate for victims of all violent and sexual crime and still believe that each victim deserves to be allocated one professional to support them through both the criminal and civil courts. We currently have Independent Domestic Violence Advisors (IDVAs) who perform this role for victims of domestic abuse. In my experience, and from listening to victims and practitioners, IDVAs do a valuable job in supporting victims. **I call on the Government to pledge to provide access to an IDVA to every victim of domestic abuse who needs such support.**

It is also complete anomaly to me that an IDVA can support the victim through the criminal court, including sitting with them in the witness box, yet has no jurisdiction in civil courts. I see the problem with this to be twofold; that the victim has no support or support from an unfamiliar individual in civil courts; and that there is a complete breakdown in continuity of care for that victim. So, **I am also recommending that IDVAs be given equal access to both family and criminal courts to provide victims with continuity of care and support.**

I support the proposals by the government to introduce two new protection measures, a Domestic Abuse Protection Notice (DAPN) to be made by the police and a Domestic Abuse Protection Order (DAPO) to be made by the courts, which importantly reflect that abuse is often not physically violent. I would, however, like to see the onus taken away from the victim to have to proactively ask for such a protective measure. I am stopping short of suggesting a blanket approach, but **where there is a report of domestic abuse I want to see the police and courts making a presumption that a DAPN or DAPO is made unless the victim indicates to the contrary.**

It is also important that if these notices come with the power of arrest should they be breached. Also, victims need to be confident that these orders will be enforced by the police and the courts.

There is widespread frustration from victims and practitioners regarding the perceived weak response from some courts if a protective order is broken, which undermines the deterrent effect and safety of the victim. I am calling for a **review of these penalties to be undertaken by government at the earliest opportunity.**

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*“The fine he got for breaking the order was worth less than his Mont Blanc pen he was signing the paperwork with.”*

*A domestic abuse victim*

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One area where I do not think the government proposals have gone far enough is around how we tackle high risk domestic abuse offenders. I am alarmed when I hear that serial perpetrators can leave a string of victims in their wake as they move from one relationship to another, often across police boundaries, continuing their abusive behaviour. Clare’s Law (the Domestic Violence Disclosure Scheme) was rolled out across the country in 2014 and allows the police to disclose information about the risk a person may pose to a new partner and importantly includes the ‘right to know’ as well as the ‘right to ask’. However, potential victims are very dependent on the competence of their particular police force in administering the scheme. Take up has been inconsistent (as evidenced by last year’s thematic report by Her Majesty’s Inspectorate of Constabulary and Fire and Rescue Services). I therefore welcome the government’s focus on how to better promote the scheme, including putting its guidance into legislation. This needs to be matched with a commitment to ensure that police officers receive the appropriate training and support.

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*“I’m safe at the moment because he’s living with a new girlfriend who is now also pregnant. I fear for her safety”*

*A domestic abuse victim*

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Where I want the government to go further is to have an **accompanying register for the most dangerous of convicted offenders, much like the existing register of sex offenders**. This will rely on judicial judgement as to the future risk posed by an offender and so whether to order the perpetrator to be placed on the register. This will enable the police, across force boundaries, to be alert to high risk perpetrators in their area and importantly will then have a duty to share this information with potential victims.

I propose that on conviction, the courts will order the offender to be placed on this register either for a fixed period or, in the most serious of cases, for the rest of their lives. They will be required to report any new change of address or change in relationship status. I would envisage that a breach will potentially attract a custodial sentence.

I fully accept that in many cases the register might be inappropriate. However, I do believe that there is a need for such a scheme as part of a range of measures to protect potential victims.

To be clear, I do not see this as a silver bullet and must not detract from funding other prevention schemes. It would be one tool which will capture a small number of offenders but is never the less important to ensure future victims are protected from these most dangerous of offenders.

## **TRAINING**

**RECOMMENDATION 10: All staff in family courts; CAFCASS; social work; health professionals; and all other front-line staff to receive regular, accredited, and mandatory domestic abuse awareness training.**

**RECOMMENDATION 11: Implement a 'Kitemark' that victims can seek out and commissioners can use in tender specifications and contract evaluation.**

I have listened to victims from across the country talk about their experience of receiving help and support both in disclosing their abuse and the resources available to them following disclosure to help rebuild their lives.

Just as no one story of abuse is the same, neither is the support an individual will need. However, every victim should be able to expect the same professionalism and competence from the services they rely on. Whilst hearing the phrase "I wouldn't be here today if it wasn't for XX" is testament to the professionalism of that individual, we can't rely on them being on shift and being in the right place at the right time. All professionals working in the sector must be able to offer the same high standard of victim support. Which is why I'm calling for all front-line staff who may come in contact with a victim of domestic abuse to have regular, accredited, and most importantly, mandatory domestic abuse awareness training modules.

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*“He just turned to me and said, ‘What do you want me to do about it? Imagine how many other wives there were last night who had to do something they didn’t want to do’”*

*A victim recalling a police officer’s reaction when reporting the rape, she’d suffered at the hands of her husband.*

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We must also give specialist practitioners in the sector the formal recognition they deserve by implementing professional standards, a ‘kitemark’, that ensures common standards and accredited training.

I am aware that some organisations run accreditation schemes and there is of course the VAWG sector shared core standards, but I want to see a rationalisation of the current training and accreditation landscape. We need to open the field so more organisations can deliver accredited training. Increasing competition in the sector will drive up quality and accessibility across the country.

**I propose the Domestic Abuse commissioner creates a body, much like the Restorative Justice Council, who will accredit training, whilst at the same time, seeking to open up the provision of accredited training to the widest possible range of providers.**

This accreditation body should also have the power of redress if the services provided are not to the quality expected of the kitemark and include retraining every three years.

## **AWARENESS**

**RECOMMENDATION 12: Every school to have a designated domestic abuse lead and for domestic abuse to be part of the new PSHE curriculum from September 2019.**

One of the four pillars of the government’s consultation is to promote awareness of domestic abuse. This is something I wholeheartedly support. Domestic abuse is everyone’s business and, in particular, the business of statutory agencies.

Given only one fifth of domestic abuse victims actually report their abuse to the police, let alone get as far as court, our response cannot just be about legislation. We all have a duty to respond; to call out abuse when we see it; and support our friends and family if they need our help. But a third of people say they wouldn’t know how to help a friend or family member suffering from domestic abuse. Meeting victims of domestic abuse and talking to them about their experiences in rebuilding their lives re-enforces to me the need to see a coordinated response from all agencies, especially housing, health, social services and schools.

Part of this raising of awareness needs to extend the view of who the victim is. I believe that the whole family must be seen as the victim, and not just the parent being targeted by the abuse. Only then will the whole family be captured in agency response e.g. mental health provision for the whole family. New research by the charity Hestia says that 55% of those who witness domestic abuse as a

child also go on to later become a victim of domestic abuse themselves. This adds to the evidence base of the cyclical nature of abuse which travels through generations.

The challenge in breaking the cycle of domestic abuse is that everyone needs to be alive to these issues and recognise the signs. I have heard fantastic reviews of how Identification and Referral to Improve Safety (IRIS) partnerships are working in some areas of the country, but also concerning reports of budgets being scaled back. Hospital based IDVAs also provide a rounded approach within a healthcare setting to link multiple agencies into one protective response.

**I recommend that all NHS Clinical and Commissioning Groups to challenge themselves about whether service provision in their area truly supports victims who are presenting to them, often well before they have disclosed the abuse to anyone in the criminal justice arena.**

Recent research published in the BMJ showed that whilst mothers wanted health care professionals to talk directly to their child about domestic abuse, the practitioners themselves wanted to filter this through the parent as they did not perceive the children to be their patient or client. Indeed, some did not feel competent to talk directly to the children. This neatly illustrates how siloed our response to domestic abuse can be.

Conversely Social Services, in putting the apparent safety of the children first, are often demanding that the parent removes her children from the family home to protect them from the perpetrator despite the fact that the point a victim is most vulnerable to physical danger, including homicide is when they are making plans to leave.

To me this highlights the need for greater collaboration across agencies in handling domestic abuse.

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*“Social services told me on the Friday that if I wasn’t out of the family home by Monday they were coming to get my kids. Where was I going to go with my 50p in my pocket and the clothes I was standing up in.”*  
*A refuge resident*

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Schools, both primary and secondary, also have a large part to play in breaking the cycle and changing attitudes to domestic abuse. They are well placed to identify the signs of domestic abuse and to alert other agencies. **I believe every school should have a domestic abuse lead**, just as they do a safeguarding or special needs lead. This member of staff should have responsibility for how domestic abuse is taught in their school and how the school responds when they have concerns about a child being at risk. This needs to include investigating the root cause of any resulting behavioural issues in the classroom.

From next September, the concept of ‘healthy relationships’ will be added to the national curriculum. This is the opportunity for domestic abuse to be discussed in the classroom as what some pupils will see at home is far from healthy. School will be one of the few places that the counter view is presented to them and so we must not shy away from discussing these difficult subjects in the classroom. **Domestic abuse must therefore be an explicit part of the new Personal, Social and Health and Education (PSHE) curriculum content.**

## **DOMESTIC ABUSE COMMISSIONER**

I welcome the proposal to create a Domestic Abuse Commissioner. Commissioners can work across government and agencies and identify where the gaps are. However, to be able to champion issues and provide the critical focal point for victims a commissioner has to have the resources available to them to make that difference.

I therefore have to question whether the estimated £1m budget the government is proposing for the domestic abuse commissioner will enable them to truly and fully commit to the vast role that is being envisaged and be able to employ the specialists the team will need. It is not clear how this figure has been reached.

The commissioner also needs to have a clear remit as there are many crimes which can contribute to a pattern of domestic abuse, but in themselves may not be classed as such e.g. stalking; modern day slavery; honour based crime and forced marriage. A clear remit will be essential to prevent a sizeable range of victim responsibility falling under the domestic abuse commissioner.

I do have other concerns around the commissioner role which go beyond the sphere of this consultation. I will however briefly say that the government also needs to be careful to not create a victim hierarchy. Whilst it is pleasing to see the enhanced powers that the domestic abuse commissioner will have, this needs now to be a template for all other commissioners. As the current proposals stand, a victim of rape in a non-domestic setting will have access to a victims' commissioner with lesser powers than a victim of rape where the perpetrator is her husband. I am sure this cannot be the policy intention.

## **Gender**

**RECOMMENDATION 13: Introduction of 'Ending Intimate Violence Against Men and Boys' strategy.**

**RECOMMENDATION 14. Research into risk assessment methods and its impact on risk levels assigned to victims who are male and/or perpetrator is female.**

Official statistics show that domestic abuse is a gendered crime, 1.4 million women (8.5% of the population) and 700,000 men (4.5% of the population) report being subjected to domestic abuse and in 2016/17 82 women were killed by a partner or former partner compared to 13 men.

However, I have purposefully attempted to keep my submission gender neutral in recognition that victims of domestic abuse can be of either sex, as too can the perpetrator. To ensure all victims are recognised and supported this sentiment needs to be stressed in any training or education delivered regarding domestic abuse and that domestic abuse is a crime perpetrated from either gender.

However, the current policy framework this consultation and Bill sit within, places all victims of domestic abuse as a victim of Violence Against Women and Girls (VAWG) – even when the victims are male. The Mankind Initiative, who support male victims of domestic abuse, are clear that this risks male victims being overlooked in policy, local service provision and recognition.

**I call on government to introduce a parallel 'Ending Intimate Violence Against Men and Boys strategy' to run alongside the 'Violence Against Women and Girls' (VAWG) policy and to ensure both take into account particular needs of victims within a same sex relationship.**

A particular issue that has been highlighted to me by charities like The Mankind Initiative is that historically, male victims are assessed by agencies using the Domestic Abuse, Stalking and Honour Based Violence (DASH 2009) Risk Identification, Assessment and Management Model as being at low risk purely because they are seen to be able to shoulder more of the abuse. This does not lessen the impact of the abuse they are suffering and support services need to respond to this. It is the crime that should be the focus, not the gender of the victim or perpetrator. This assessment of risk then filters through to cases discussed at Multi-Agency Risk Assessment Conferences (MARACs), which only deal with the most severe of cases. Currently, the vast majority of which are discussing how to protect a female victim. **I would like to see the government commission research into whether current risk assessments are capturing the true picture and risk in relationships where the perpetrator is not male and/or the victim is not female.**

### **Consultees**

I am hugely thankful to all those who have taken the time to talk to me and the Office of the Victims' Commissioner to inform this response. They include individuals, practitioners, and service users from the following organisations;

Aurora New Dawn; Blackburn & Darwen District Without Abuse; The Dash Charity; Dorset Police and Crime Commissioner and Chief Constable; Dorset Police Force; Dorset Victims Hub; East Surrey Domestic Abuse Service; Fortalice Domestic Abuse Centre; Galop; Hestia; Mankind; Northamptonshire Sunflower Centre; Nottingham Police and Crime Commissioner and Chief Constable; Nottinghamshire Police; Nottinghamshire Women's Aid; Panahghar; Respect; SafeLives; Victims' Commissioner Advisory Group; Women's Aid; Women's Aid Integrated Services.