

A Whole-Society Approach to ending Violence against Women and Girls: VAWG Sector Manifesto

Plain-text version

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Accessibility

This is a plain-text version of the A Whole-Society Approach to ending Violence against Women and Girls: VAWG Sector Manifesto report.

Introduction

Violence against Women and Girls (VAWG) is endemic across society and remains disturbingly present in the UK. Whilst the government has repeatedly committed to ending VAWG as a priority, it remains the case that every three days, a woman in the UK is killed¹ by a man and one in four women experience domestic abuse in their lifetimes². In January 2023, the Office for National Statistics (ONS) latest crime figures stated that sexual offences are at the highest level recorded³, whilst police-recorded offences relating to so-

¹ Femicide Census (2020) [UK Femicides 2009-2018](#)

² Refuge (undated) [The facts.](#)

³ Office for National Statistics (2023) [Sexual offences in England and Wales overview: year ending March 2022](#)

called honour-based abuse are also increasing⁴. Overall, 1 in 6 children are estimated to have been subjected to sexual abuse, with girls being three times more likely to experience sexual abuse than boys⁵, and women are 27 times more likely than men to receive online harassment and abuse⁶. Behind the statistics and data, there are adult and child survivors of VAWG, and sometimes bereaved families, dealing with the trauma of these harms.

VAWG is a gendered issue which is deeply rooted in societal inequality. It is violence that is “directed against a woman because she is a woman or that affects women disproportionately”.⁷ Women are more likely than men to experience multiple incidents of abuse and different types of abuse (intimate partner violence, sexual assault and

⁴ Office for National Statistics (2023) [Sexual offences in England and Wales overview: year ending March 2022](#)

⁵ NSPCC (2021) [Statistics briefing: child sexual abuse](#)

⁶ National Police Chief's Council (2023) [Violence against women and girls strategic risk assessment](#)

⁷ CEDAW 1992: para. 6

stalking) - in particular sexual violence⁸. Any woman or girl can experience VAWG, however those who face other forms of inequality as a result of their race or ethnicity, wealth or social class, religion, sexuality, gender identity, disability, mental health or age are more likely to experience abuse and less likely to receive support and justice. As VAWG is a cause and consequence of gender inequality and other intersecting inequalities, it is essential that we situate our work to end it alongside wider ambitions to tackle said structural inequalities. For example, policies to tackle economic inequality, poverty, health inequalities and to dismantle the hostile immigration environment.

⁸ Office for National Statistics (2022) [Domestic abuse victim characteristics, England and Wales: year ending March 2022](#)

In the context of a cost of living crisis⁹¹⁰ and with the lasting impact of the Covid-19 pandemic¹¹, more survivors are seeking support from specialist women-led¹² and ‘by and for’¹³ VAWG organisations. Migrant survivors are confronted with additional barriers to safety in the form of ‘hostile environment’ policies such as the No Recourse to Public Funds condition and the fall-out of new punitive legislation towards people who come to the UK seeking safety. Meanwhile, we have witnessed an explosion of online misogyny¹⁴, with tech companies creating new and ever-

⁹ Various organisations (2022) [Statement on behalf of VAWG organisations in England and Wales on the Cost of Living Crisis](#)

¹⁰ Women’s Resource Centre (2023) [The impacts of the cost-of-living crisis on the women’s sector](#)

¹¹ End Violence Against Women Coalition (2020) [Initial briefing on the COVID-19 pandemic and the duty to prevent violence against women and girls](#)

¹² Specialist support services operate independently from the state and their sole organisational purpose is to support adult and child survivors impacted by VAWG.

¹³ [By and For — Imkaan](#)

¹⁴ The Times (2023) [Social media companies profit from misery spread by misogynistic influencers](#)

emerging opportunities for VAWG in the digital sphere¹⁵. It is clear that significant action is needed to tackle this problem.

In 2022, the economic and social costs of domestic abuse in England were just under £78 billion¹⁶, yet adequate provision of specialist support services could create cost-savings across society. For example, the domestic abuse sector is able to deliver savings to the public purse of up to £23 billion a year, at the cost of just £427 million¹⁷. The evidence of our cost benefit analysis is clear. Every pound

¹⁵ National Police Chief's Council (2023) [Violence against women and girls strategic risk assessment](#)

¹⁶ Women's Aid. (2023) [Investing to save: the economic case for funding specialist domestic abuse support](#). Bristol: Women's Aid.

¹⁷ Women's Aid. (2023) [Investing to save: the economic case for funding specialist domestic abuse support](#). Bristol: Women's Aid.

invested in domestic abuse support services will see a saving to the Exchequer of at least £9.¹⁸

“The current efforts are just putting a sticking plaster on the issue – it’s not making a difference to survivors.” Survivor, 2023.

In the lead up to the 2024 General Election, we are calling on all political parties to commit to a comprehensive whole-society approach to addressing VAWG, which centres the most marginalised.

We frame this manifesto around ten key areas:

1. Rights and inequalities
2. Prevention

¹⁸ Women’s Aid. (2023) [Investing to save: the economic case for funding specialist domestic abuse support](#). Bristol: Women’s Aid.

3. Funding and commissioning of specialist VAWG services, including 'by and for' provision
4. Economic barriers
5. Partnerships and multi-agency working
6. Health and adult social care
7. Housing
8. Family courts and children's social care
9. Criminal justice reform
10. Perpetrators

Key principles

We are clear that the following principles must underpin any approach to ending VAWG:

- Human rights - a universal rights-based approach, which protects and supports all women and girls, including those facing additional forms of discrimination
- Feminist and gendered approach - the Committee on the Elimination of Discrimination against Women

(CEDAW) makes clear that all forms of violence against women are defined as discrimination – explicitly linking gender-based violence to gender inequality and wider forms of discrimination experienced by women¹⁹. A gendered, feminist framework also creates an understanding of the context of patriarchy, of the link between gender inequality, conformity and VAWG, and therefore also the gender-based violence experienced by GBT+ men and non-binary people.

- Intersectional - the specialist 'by and for' sector²⁰ has developed approaches underpinned by intersectionality which provide a useful framework to define and address VAWG. A response that is intersectional suggests all experiences must be

¹⁹ CEDAW 1992. para 6.

²⁰ It is important to note that due to systemic exclusion and oppression, the full range of voices are not necessarily represented within the specialist 'by and for' sector therefore it is always essential to undertake thorough consultation, ensure accountability and to sometimes undertake restorative work to lift up the voices of some excluded survivors.

addressed comprehensively, holistically and through women-centred, trauma-informed, needs-led wrap-around support recognising women as whole, and not fragmented, human beings with full enjoyment of human rights.

- Non-discrimination - everyone across government, statutory agencies, local commissioners and society must have due regard to the need to protect the rights of all survivors without discrimination on any of the grounds prohibited by Article 4, paragraph 3 of the Istanbul Convention²¹.
- Anti-racist - systemic, institutional, and structural racism shapes how Black and minoritised women experience violence and abuse, and their access to safety, support and justice. A whole-society response should also seek to eliminate racism through care, rigour and meaningful collaboration²² that results in a

²¹ [CETS 210 - Council of Europe Convention on preventing and combating violence against women and domestic violence \(coe.int\)](#)

²² Imkaan, 2017, [Uncivil partnerships? reflections on collaborative working in the ending violence against women and girls sector](#), London. Imkaan.

space of unity where the leadership and contributions brought by specialist 'by and for' Black and minoritised women's organisations are fully recognised and supported by white counterparts.²³

- Survivor voice - survivors are the experts in their own experience, and our calls are based on their expertise and the support and tools they need to rebuild their lives.
- Cross-government accountability - a truly cross-government response where all government departments, statutory agencies and local commissioners are accountable for progress.

Women and girls' right to live free from violence should be a key election issue. However, we are alert to the potential of the issue being 'co-opted' or 'weaponised' during political campaigns. For example, violence against women and girls has previously been used to justify regressive legislation which has seen a roll back of our collective rights, and to prop up anti-migrant sentiment.

²³ VAWG Sector Anti-Racism Charter (2021)

Violence Against Women and Girls (VAWG)

The Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence 2011 (Istanbul Convention), to which the UK government is signatory, defines violence against women as:

“a violation of human rights and a form of discrimination against women and shall mean all acts of gender-based violence that result in, or are likely to result in, physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.”

1. Rights and Inequalities

Violence against women and girls is a human rights violation²⁴. Women's right to live free from violence and the state's obligations are set out in a number of international legal standards and agreements, as well as national law in the UK:

- United Nations (UN) Declaration on the Elimination of Violence against Women (1993)
- United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- United Nations Convention on the Rights of Persons with Disabilities
- United Nations Convention on the Rights of the Child (CRC)
- European Convention on Human Rights
- Human Rights Act (1998)

²⁴ [CETS 210 - Council of Europe Convention on preventing and combating violence against women and domestic violence \(coe.int\)](https://www.coe.int/en/v/violence-against-women)

- Equality Act (2010)
- Council of Europe Convention on preventing and combating violence against women and domestic violence (also known as the Istanbul Convention)

As is widely understood, treating people equally does not mean treating them the same. Experiences of violence and abuse – and access to support, safety and justice – can be different for different groups of women. Whilst all women and girls are affected by patriarchy, inequality and discrimination, some will be affected disproportionately due to their race, ethnicity, sexuality and orientation, gender identity including transgender identity, disability, age, class, immigration status, caste, nationality, indigeneity, linguistic minority, and faith. We cannot achieve our aims if we do not address discrimination faced by Black and minoritised women, migrant women, D/deaf and disabled women and members of the LGBT+ community. Consequently, in order to achieve equal access to protection and support, the approach to end VAWG must reflect the different experiences and needs of women and girls and

acknowledge the links between the gender-based violence experienced by GBT+ men and non-binary people. Major reform is needed to remove the barriers to equal and equitable treatment and access that women and girls currently face, bringing the needs of minoritised and migrant women to the centre²⁵.

A coordinated strategy to end VAWG must be grounded in a human rights framework and states' obligations to take positive action to prevent and protect women from violence. Domestic legislation such as the Human Rights Act, and international conventions such as the European Convention on Human Rights, are vital instruments in the pursuit of ending VAWG. We must support people to know their rights, empower people to ensure their rights are upheld, and ensure people's rights are integrated into national and local policy and practice. Political parties should work towards eliminating the conditions that create violations of human rights; for example, by improving governance and public

²⁵ Imkaan (2018) [Summary of the Alternative Bill: From the Margin to the Centre Addressing Violence Against Women and Girls](#)

service delivery, and enhancing access to justice and accountability. Proposals that reduce or restrict the realisation of human rights in the UK, including for particular groups, undermine our cause.

Women's right to live free from violence is inextricable from the principle of universal human rights. We know that survivors can easily fall outside of the mould of "perfect victim"; for example, those who have contact with the criminal justice system, have irregular immigration status, or any other experience that may mean people and services render them as "undeserving" of protection. These women often find that their human rights are denied. It is therefore very concerning to see the creeping undermining of the universality of human rights in legislation such as the Victims and Prisoners Bill and 'Illegal' Migration Act, and in the UK's reservations to the ratification of the Istanbul Convention, denying certain rights to migrant women.

This sits alongside the broader threat to rights fundamental to the feminist movement, such as the right to protest. Protest is a feminist issue, firmly embedded in the struggle

for women's rights – particularly the rights of Black and minoritised women. Our fight to end violence against women relies heavily upon our ability to gather together, to mourn our sisters, to expose injustice, and to collectively demand change.

We are clear that the promotion of human rights, civil liberties and justice are part and parcel of our fight to end violence against women and girls.

Recommendations

- Uphold the established international and human rights-based definitions of VAWG.
- Preserve and promote domestic and international human rights and equalities legislation, including upholding the principle of universal human rights.
- Protect the right to protest.
- Lead legal, policy and funding reform to deliver equal protection for all women - embedding the specialist women-led and 'by and for' sector's practice of

intersectionality to meet the needs of all women and girls²⁶, and the intersecting forms of oppression they face, including:

- Identify and address inequalities in the prevalence of VAWG and outcomes for Black and minoritised, migrant, D/deaf and disabled and LGBT+ survivors.
- Ensure migrant women have equal access to support to escape abuse and can access statutory services without fear of immigration enforcement.

This includes:

- Full ratification of the Istanbul Convention, ensuring the gold standard framework for addressing violence against women underpins the next government's work; removing reservations on Articles 44 and 59.
- Introduction of a complete firewall to stop data-sharing between statutory agencies and

²⁶ Imkaan (2023), [A Participatory Evaluation of the Comic Relief Supporting and Sustaining Specialism Programme for the Black & Minoritised women-led by and for sector](#)

immigration enforcement to enable victims to come forward to report abuse and access help.

- Extend the Domestic Violence Indefinite Leave to Remain (DVILR) and Destitution Domestic Violence Concession (DDVC) model for those on partner/spousal visas to all migrant victims of abuse regardless of their immigration status²⁷.
- Extend the current three-month provision to six months under the DDVC to take account of processing delays, to give victims the 'breathing space' to resolve problems by obtaining advice and recovering from abuse, and to encourage more refuge providers to accept referrals and not turn victims away.

²⁷ Southall Black Sisters (2020) [The Domestic Abuse Bill: Migrant Women Briefing Paper 2](#)

- End the hostile environment, including scrapping the No Recourse to Public Funds policy²⁸²⁹, NHS charging systems, and right to rent.
- Build an asylum system based on belief, compassion and support, including the repeal of harmful legislation which punishes people seeking safety in the UK, such as the 'Illegal' Migration Act, Nationality and Borders Act, and the Rwanda plan.
- Ensure all women who claim asylum have access to a fair and timely decision which recognises the specific experiences of women, including those who have suffered sexual and gender-based violence and women from the LGBTQ+ community.
- Ensure proper support for women who are in the asylum system, including, but not limited to, access to high-quality legal advice.

²⁸ Southall Black Sisters (2023) [Support for Migrant Victims Fund Evaluation](#)

²⁹ Southall Black Sisters (2020) [The Domestic Abuse Bill: Migrant Women Briefing Paper 2](#)

- End the use of immigration detention which harms and re-traumatizes women seeking safety.
- Introduce Valerie's Law for mandatory cultural competency training for professions around the cultural nuances and barriers, colloquialisms, languages and customs that make up the diverse black community, as called for by Sistah Space³⁰.
- Full inclusion for D/deaf and disabled survivors' experiences and needs into the VAWG response, and the recommendations of the Communication Barriers Working Group report to be implemented in full.³¹
- Update the definition of domestic abuse to reflect abuse by non-family carers³².

³⁰ Sistah Space (Undated) [Valerie's Law](#)

³¹ Communication Barriers Working Group (2023) [Listen to us! \(endviolenceagainstwomen.org.uk\)](#)

³² We endorse a wider definition of 'personal connection' to cover those formal or informal carers who assist or support disabled people and with whom a disabled person might form a personal connection. The current definition of domestic abuse has a discriminatory impact on disabled victims of domestic abuse by non-family carers, who have no access to an Independent Domestic Violence Adviser, refuges or other domestic abuse

- Bring forward a comprehensive ban on so-called “conversion therapy” - a form of gender-based violence that includes domestic abuse, so-called honour-based abuse, trafficking and forced marriage.³³ To be effective, this must include:
 - Protection for everyone in the LGBTQ+ community: trans, non-binary and gender diverse people and people on the asexual and aromantic spectrums.
 - No ‘consent loophole’ in law for those over the age of 18.³⁴

services or to the network of therapeutic and other services open to other domestic abuse victims. See Stay Safe East (2021) [Policy Briefing: Domestic Abuse Bill Proposed Amendments: Disabled Survivors](#)

³³ Carlisle, E. & Withers Green, L. [“There was nothing to fix”: LGBTQ+ survivors’ experiences of conversion practices](#). Galop; 2022.

³⁴ The Government consultation on the proposed ban on conversion practices suggested that the Act would make any cases against under 18s illegal but would not criminalise conversion practices in those over the age of 18 who had “consented” to what happened to them. This would create an example in British law where it is possible to consent to abuse as an adult and does not take into account how coercive control and the risk of familial or community ostracisation plays into many of these cases. See Galop (2021) [Conversion Therapy Ban: Consultation Response](#)

- A definition that covers conversion practices that include religious practices and those that are currently existing offences.

2. Prevention

Violence against women and girls is not inevitable yet remains one of the most pervasive human rights violations in the UK. We must be able to respond to VAWG when it happens, but we also know that we cannot eradicate it without tackling the structures, institutions and attitudes which uphold and facilitate it.³⁵ Without due attention to gender inequality, discrimination, harmful gender norms and attitudes - and the cultures they promote - the root causes and harmful consequences of VAWG will persist. The next government must embed prevention and early

³⁵ Jewkes, R., Flood, M., Lang, J. (2015). From work with men and boys to changes of social norms and reduction of inequities in gender relations: a conceptual shift in prevention of violence against women and girls. *The Lancet*, 385 (9977), 1580-1589. DOI:[https://doi.org/10.1016/S0140-6736\(14\)61683-4](https://doi.org/10.1016/S0140-6736(14)61683-4)

intervention as an integral part of their approach to VAWG; challenging myths, stereotypes and misogyny across society including in our schools and online spaces.

In recent years we have seen the growth of online misogynist influencers who promote violence against women and girls which have had a real impact on boys and men's attitudes and behaviour³⁶. We also continue to see abusers utilise developments in technology to further their abuse³⁷, with tech companies promoting and profiting from such harmful content. It is therefore essential a more preventative approach is taken towards VAWG in online spaces.

Our schools are a critical site for the protection of children and young people and present the best opportunity to challenge attitudes which condone abuse and transform the long-term likelihood of abuse in adult relationships.

³⁶ National Police Chief's Council (2023) [Violence against women and girls strategic risk assessment](#)

³⁷ Culture, Media and Sport Committee' (2023) [Connected tech: smart or sinister?](#)

Although Relationships, Sex and Health Education (RSHE) in England and Relationships and Sexuality Education (RSE) in Wales, is now mandatory in schools, we are concerned by the barriers to the delivery of a robust RSHE/RSE curriculum. Most recently, a troubling backlash to RSHE/RSE in schools seems to have been fuelled by largely anti-LGBTQ+ rhetoric and contested claims about inappropriate content. Critically, RSHE/RSE is only the beginning of the change needed - schools should be supported to embrace this curriculum and go further to take proactive steps to create a culture in which girls can thrive and fully access their right to education, free from violence and abuse. Any future government should take steps to implement a 'Whole School Approach' in education – a model recommended in the 2021 Ofsted report³⁸. This will require not only the essential training for teachers and school staff, but also the necessary changes in policy and transformation of the school culture and community. It is essential that a Whole

³⁸ Ofsted (2021). [Review of sexual abuse in schools and colleges.](#)

School Approach model tackles intersecting forms of inequality and marginalisation.

Recommendations

- Adoption of a public health approach to preventing VAWG, including:
 - A commitment to identify and implement interventions to prevent violence against women and girls, including sexual abuse.
 - Funding and delivery of multi-year, long-term effective public communication campaigns and community responses that challenge harmful social norms and perpetrator and bystander behaviour.
 - Equip all relevant government departments and statutory agencies to deliver reforms across government to tackle gender inequality (such as equal pay and shared parental leave), paying close attention to intersecting inequalities and

recognising that gender inequality cannot be separated out from other forms of inequality.

- Ensure the collection of comprehensive, comparable and disaggregated data on VAWG across government – at a minimum data must always be collected on the protected characteristics for both victim and perpetrator(s) and their relationship, with appropriate safeguards for anonymity.
- Prevention with children and young people:
 - Government must commit to strategic investment to prevent and respond to VAWG in all schools and higher education settings, including the delivery of a Whole School Approach. This should include sufficient investment in school staff to enable training, resourcing, and dedicated capacity for RSHE/RSE delivery, and dedicated funding for specialist local VAWG services, including ‘by and for’ organisations, to design and implement prevention interventions.

- A commitment to protect the future of RSHE/RSE delivery - ensuring it takes an intersectional, inclusive and holistic approach, centring the voices and needs of children and young people, and valuing the expertise of the specialist VAWG sector, including in the development and delivery of curriculum materials.
- Online space:
 - A commitment through legislation, and other mechanisms, to better address online VAWG - with a preventative, holistic and intersectional approach. Solutions should focus on safety-by-design and product security and require accountability and transparency from tech companies within a human rights framework. It should also be future-proofed to tackle emerging harms.
 - A Tech Tax that ringfences tax collected from tech companies to fund preventative online gender-based violence work, for example 10%

of the revenue raised from the Digital Services Tax ring-fenced to fund specialist VAWG sector efforts to effectively address online VAWG, with 50% of this ring-fenced for specialist 'by and for' led services for Black and minoritised women and girls.

3. Funding and Commissioning, including 'by and for' provision

The specialist VAWG sector, most acutely 'by and for' organisations, continue to face a funding crisis, resulting in a postcode lottery for survivors and women being turned away daily at the point of need.³⁹ The cost of living crisis, the continued aftermath of the COVID-19 pandemic and an increase in the complexities of cases is having lasting impacts on prevalence of VAWG and operation of the VAWG

³⁹ Domestic Abuse Commissioner for England and Wales (2022) '[A Patchwork of Provision: How to meet the needs of victims and survivors across England and Wales.](#)'

sector. VAWG has enormous costs to women and girls, as well as to society and the state, and strategic investment is urgently required to ensure the full range of specialist support services that women and girls need are available, accessible and sustainable. The UK Government has a number of duties under the Equality Act 2010, Istanbul Convention and Human Rights Act 1998 to fund this vital work - from prevention, to therapeutic and psychoeducational support, to refuge services. In Wales, the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act provides similar duties to address VAWG.

Specialist violence against women and girls services offer a holistic package of wrap-around support and wellbeing services. This trauma-informed, needs-led, strengths-based approach meets women's often multiple and wide-ranging needs and reduces reliance on statutory services like the NHS, where resource limitations can prevent a bespoke service and continuity of care. Access to specialist services prevents further abuse and reduces duplication of effort

and pressure on other services. For example, Women's Aid Federation of England finds that the economic case is clear for the next government to commit to investing £427 million per year, as a minimum, to fund specialist domestic abuse services for women and their children across England. As an economic analysis commissioned by Women's Aid Federation of England shows, for every pound invested in domestic abuse support services we will see a saving to the public purse of at least £9.⁴⁰

It is important to note the sustainable and equitable provision of specialist 'by and for' VAWG services is essential in the response. These services are delivered 'by and for' the users and communities they aim to serve, by organisations whose primary purpose is to tackle VAWG, and provided by expert staff with an in-depth knowledge of VAWG. Specialist services led 'by and for' Black and minoritised women, D/deaf and disabled women, LGBT+ survivors and other groups are trusted by the survivors and communities they

⁴⁰ Women's Aid. (2023) [Investing to save: the economic case for funding specialist domestic abuse support](#). Bristol: Women's Aid.

support due to their understanding of multiple forms of discrimination, their linguistic and cultural accessibility, and their intersectional practice. To ensure provision is available and accessible to all who need it, this investment should come with a portion of funding ring-fenced for specialist services led 'by and for' Black and minoritised women, D/deaf and disabled women, and the LGBT+ community. This level of funding will not only provide these services with the minimum level of resources they need to carry out life-saving work, but also bring significant cost savings to other public services.⁴¹

The current short-term and competitive funding model for specialist support provision is not working and pits services against each other. Tendering is a competitive process; however, the specialist sector is part of the social economy of provision and does not compete on an equal footing in an open 'market'. Such competition results in commissioners and funders gambling with the lives of women and girls –

⁴¹ Women's Aid. (2023) [Investing to save: the economic case for funding specialist domestic abuse support](#). Bristol: Women's Aid.

changing providers in order to cut costs, disrupting life-saving services and losing the vital expertise and experience of specialist services in supporting survivors. Commissioning must not continue down this road. Without urgent action to reform the funding landscape for these specialist services, the government will not be compliant with Article 22 of the Istanbul Convention.⁴²

Recommendations

- Deliver a secure, national multi-year funding settlement for the specialist VAWG sector, that is accessible to these services:
 - This must ensure all forms of service provision for survivors, children and young people and perpetrators are resilient for the future.

⁴² [Council of Europe Convention on preventing and combating violence against women and domestic violence](#)

- It must provide equity of provision for survivors across the UK nations and be delivered by all government departments responsible for VAWG.
- Introduce national ring-fenced funding for specialist services led 'by and for' Black and minoritised women, D/deaf and disabled women and LGBT+ survivors.
- Sustainable ring-fenced funding for specialist sexual violence and abuse services that includes appropriate contributions from Health and Education bodies. The government must commit to re-commissioning of the Rape and Sexual Abuse Fund as a multi-year fund beyond 2025.
- Systematic reform of the current competitive funding and commissioning landscape to

ensure the specialist 'by and for' VAWG sector can fairly access funding. This requires:

- Returning to long-term grant funding for VAWG provision.
- Ending competitive tendering where it is not required, for example for smaller specialist VAWG services.
- Ensuring all VAWG funding and commissioning processes recognise, and value specialist support provision as required under the Istanbul Convention.
- Guaranteeing that local funding processes adhere fully to the Equality Act and the Public Sector Equality Duty.
- Adopting established quality standards in the VAWG sector as the basis for funding.

- Ensure that funding for VAWG organisations supports the full running costs of services, makes provision for cost of living increases over the funding period and allows for the remuneration of staff that reflects their specialist knowledge and skills.
- Ensure that all public funding for VAWG support promotes gendered, trauma-informed, needs- and risk-led, holistic, accessible, and wrap-around support services as the sustainable way of addressing intersecting needs and preventing repeat victimisation and exposure to further risk. This requires moving away from a focus on funding through criminal justice outcomes, valuing women's healing, and long-term recovery more holistically and

comprehensively, and ensuring women have a voice in the support they can access.

- Clarify the legal responsibilities of the government and public bodies to sustainably fund specialist support services, including for women and children, under Article 22 of the Istanbul Convention.
- Deliver a robust system of national accountability, based on established quality standards⁴³ within the VAWG sector, to ensure survivors of all forms of VAWG can access the specialist support services they need – including services led ‘by and for’ survivors with additional protected characteristics.

⁴³ Imkaan, Rape Crisis England & Wales, Respect, SafeLives, Women's Aid (2017) [Sector Sustainability Shared Standards: Shared values that apply across the VAWG sector](#)

4. Economic barriers

VAWG has a detrimental impact on women's economic stability and independence. For example, a survivor may have to flee their home, give up work, or may have coerced debts as a result of economic abuse. We know that many women who face abuse and violence have experienced economic control by their abuser(s). Economic safety is key to women and girls' physical safety and long-term recovery, as a lack of economic resources is a primary reason why women struggle to leave an abuser and also makes the process of rebuilding their life even more challenging. Furthermore, the soaring cost of living has exacerbated these economic barriers, making it even harder for survivors to escape abuse. Women's Aid Federation of England's research has found that for survivors of domestic abuse:

- Almost all survivors (96%) responding had seen a negative impact on the amount of money available to them as a result of cost of living increases.⁴⁴
- Two thirds (66%) of survivors said that abusers are now using the cost of living increase and concerns about financial hardship as a tool for coercive control, including to justify further restricting their access to money.⁴⁵
- Almost three quarters (73%) of women living with and having financial links with the abuser said that the cost of living crisis had either prevented them from leaving or made it harder for them to leave.⁴⁶

Women are also more likely than men to rely on social security, and over a decade of austerity has led to both a fall in payments and a rise in poverty for women, children and

⁴⁴ Women's Aid (2022). [Cost of Living and the impact on survivors of domestic abuse.](#)

⁴⁵ Women's Aid (2022). [Cost of Living and the impact on survivors of domestic abuse.](#)

⁴⁶ Women's Aid (2022). [Cost of Living and the impact on survivors of domestic abuse.](#)

those in work. Policies related to Universal Credit, the benefit cap, the two-child limit, the 'bedroom tax', the benefits freeze and other changes have all worsened gender inequality and other inequalities, which disproportionately affect Black and minoritised women, disabled women and single mothers.⁴⁷⁴⁸ There are also potentially discriminatory elements of the concessions for survivors that do exist within the welfare system (like The Domestic Violence Easement), which currently exclude disabled survivors.⁴⁹

⁴⁷ Women's Budget Group (2023) [Spring Budget 2023 Pre-Budget Briefings: Social security and gender.](#)

⁴⁸ Women's Budget Group, Runnymede Trust, Coventry Women's Voices, RECLAIM (2017) [Intersecting inequalities: The Impact of Austerity on Black and Minority Ethnic women in the UK.](#)

⁴⁹ The Domestic Violence Easement introduced in 2012 allows anyone who can provide evidence of domestic abuse (for example a letter from an IDVA or a police report) a three month respite from work related activities if they are claiming Job Seekers Allowance or Universal Credit. However, the Easement does not currently apply to disabled people or those with health conditions who are claiming or start a claim for Employment Support Allowance (ESA) or are in the support group for ESA or Universal

Economic barriers are particularly acute for asylum-seeking women who, due to the current workings of the asylum system, are often trapped economically and forced into destitution.

Meanwhile, women's access to legal aid, which has long been a critical lifeline for those facing crises' such as domestic abuse, is prohibited by means-testing which leaves far too many unable to access the legal help they need because they cannot afford it.⁵⁰

To end VAWG, we must address the economic inequalities faced by women, with a focus on the most marginalised.

Credit (UC). See Stay Safe East (2021) [Policy Briefing Domestic Abuse Bill: Proposed Amendments: Disabled Survivors](#)

⁵⁰ Women's Budget Group (2023) [Gender Gaps in Access to Civil Legal Justice](#)

Recommendations

- Reform of the welfare-benefits system so that it supports survivors' economic independence and does not facilitate economic abuse, including:
 - Lifting the No Recourse to Public Funds condition.
 - Splitting all universal credit joint claims by default, so each adult receives a payment.
 - Making all benefit advances for survivors payable as grants not loans.
 - Ending the two-child limit.
 - Reform of the child maintenance services by abolishing all fees for survivors and implementing robust enforcement measures for non-paying parents.
 - Extend the Domestic Violence Easement available to survivors claiming Job Seekers' Allowance or Universal Credit to disabled survivors claiming Employment Support Allowance or in the Support Group for Universal Credit.

- Conduct and publish equality impact assessments of all spending and revenue raising policies.
- Better provision of legal services for survivors; introducing an exemption for the means test in civil, family and immigration proceedings for all survivors so they can access justice and the protections they and their families need.
- Emergency funding should be made available for domestic abuse victims, to assist them to flee the abuser and to cover their immediate and short-term costs. The fund should be available to all victims of domestic abuse equally and without discrimination, including migrant women with No Recourse to Public Funds.
- Reduce energy costs for all refuges and community-based services during the cost of living crisis, for example by extending the remit of Warm Home Discount Scheme to include refuges and community-based services.

- Ensure the Violence Against Women and Girls National Statement of Expectations⁵¹ identifies the need for specialist economic advocacy, in partnership with money, debt, and benefits advice as well as financial services, to help survivors re-establish their economic independence and rebuild their lives.
- Enable people seeking asylum, who are able and want to work, the right to do so to help remove economic barriers and remove reliance on asylum support.
- In the workplace:
 - Ensure there is monitoring of the prevalence and nature of sexual harassment, including racialised forms of sexual harassment to which Black and minoritised women are subjected, and a statutory Code of Practice for employers to prevent and respond to sexual harassment and victimisation at work.
 - Ensure that women and girls in the precarious job sector, who often experience sexual harassment

⁵¹ Home Office (2022) [Violence Against Women and Girls National Statement fo Exemption](#)

and sexual violence in the workplace,⁵² are protected by ensuring rights in the workplace and ending zero-hours contracts.

- Follow Northern Ireland's lead by introducing a statutory paid leave entitlement for survivors of domestic abuse in the rest of the UK. This would enable survivors to leave the abuser and deal with the aftermath of leaving while maintaining access to an income so they can safely rebuild their lives.
- Ensure government departments lead by example by introducing robust domestic abuse policies to support their staff and encourage employers in the private sector to follow suit.

5. Partnerships and Multi-Agency Working

Women and girls' lives cannot be fragmented, and neither can society's response to the abuse they experience. Multi-

⁵² Suzy Lamplugh Trust (2022) [Stamp Out Harassment: Ending Harassment of Night-time Economy Workers](#)

agency partnership working needs to be prioritised if we are to see the whole picture of a survivor's situation and ensure they receive the most effective safety and support planning from agencies.

As things stand, multi-agency structures are dealing with excessive caseloads and often manage demand through poor risk assessment and other practices. Multi-agency responses too often fail to keep survivors safe, do not meet the needs of women and children, and do not adequately respond to their experiences of abuse – resulting in repeat victimisation rather than early intervention to prevent further harm. Multi-agency working can be especially poor for survivors of sexual violence. Major gaps, in particular an appropriate multi-agency approach to safeguarding children subjected to rape and sexual abuse, are further harming and endangering girls, and children more widely. A Coordinated Community Response (CCR)⁵³ that brings together services, including health, housing, social care,

⁵³ Standing Together (2020) [In Search of Excellence -A refreshed guide to effective domestic abuse partnership work – The Coordinated Community Response \(CCR\)](#).

education, criminal justice, debt advice organisations, financial services and communities, is needed to ensure local systems keep survivors safe, hold abusers to account, and prevent VAWG. In order to do this, shared responsibility across agencies, good governance and strong coordination is vital. This response needs to be locally developed and locally owned in order to appropriately reflect and meet nuanced local practices, challenges and opportunities. An intersectional approach that centres the survivor's voice and experience is paramount and can only be achieved through the full and equal representation of specialist support services in multi-agency responses. Such partnerships should be the foundation of local ending-VAWG plans, strategies and practices, and must be backed by adequate resourcing for the specialist VAWG sector to ensure their meaningful involvement.

Recommendations

- Deliver adequate funding for all public sector agencies to tackle VAWG, ensuring that they have the capacity to participate in a public health approach to preventing and responding to VAWG effectively. This must include training delivered by specialist VAWG services to ensure professionals provide the right response to survivors, and funded care pathways for survivors to access specialist VAWG services that is ring-fenced and sustained.
- Incentivise and encourage local areas to work together to respond to the changing nature of all forms of VAWG in their area - recognising the diversity of survivor experiences, understanding their local population and the specific needs of their communities, so that they are adequately meeting the needs of, in particular, minoritised and marginalised survivors.
- Equip Coordinated Community Responses to not only deliver a crisis response to VAWG but work to identify

abuse early on and prevent it from happening in the first place.

- Clearly define the specialist VAWG sector as expert providers and critical strategic partners whose participation is essential for effective local, regional and national VAWG partnerships.
- Ensure the Public Sector Equality Duty and equality impact assessments are routinely used by local authorities and other statutory agencies, to ensure that women are treated equally in all decision-making processes that affect them, including taking into consideration any intersecting protected characteristics.

6. Health and Adult Social Care

Health care professionals play a vital role in our national response to VAWG. They hold a unique position in their

access to survivors, perpetrators and children.⁵⁴ These professionals in every hospital, GP surgery and mental health service will be seeing those impacted by VAWG on a daily basis, and can often be one of the few services survivors can attend without perpetrator(s) present (though not often the case for disabled survivors).⁵⁵ Healthcare professionals are often trusted by those affected by VAWG and expected to know how to respond. Yet there remains insufficient awareness, and/or understanding, from health bodies about how to tackle these issues. This results in patchy, inconsistent support pathways and varied commitment to commissioned service provision. Poor information sharing and engagement from health bodies

⁵⁴ SafeLives (2016) [A Cry for Health: Why we must invest in domestic abuse services in hospital](#)

⁵⁵ Disabled women are often accompanied to medical appointments by their 'carer', who may be a family member, a paid worker from their supported housing or residential care unit. They may never see a health professional alone which can mean that there is no opportunity to disclose or to be asked about abuse. See Stay Safe East (2021) [Stay Safe East Response to Women's Health Strategy](#)

are regularly cited in Domestic Homicide Reviews⁵⁶, and IICSA provided ample evidence of how health issues that arose from child rape and sexual abuse were not identified, questioned, or followed up by GPs, hospitals, and other health professionals.⁵⁷ Furthermore, we rarely see vital specialist VAWG services funded by health commissioners⁵⁸, despite research highlighting that, for example, domestic abuse costs the NHS £2.7 billion per year.⁵⁹

The complexities of VAWG and its impact is often not recognised and the patient is not supported or treated in a holistic way. The focus tends to remain on clinical

⁵⁶ Montique, B. (2019). [Executive Summary London Domestic Homicide Review \(DHR\) Case Analysis and Review of Local Authorities DHR Process.](#) Standing Together.

⁵⁷ Independent Inquiry into Child Sexual Abuse (2022) [The Report of the Independent Inquiry into Child Sexual Abuse](#)

⁵⁸ Women's Aid. (2021). [Mental Health and Domestic Abuse: A review of the literature.](#)

⁵⁹ Women's Aid. (2023) [Investing to save: the economic case for funding specialist domestic abuse support.](#) Bristol: Women's Aid.

interventions. These interventions can lack insight into the many dimensions of VAWG⁶⁰, its devastating impact on physical, mental and emotional health and wellbeing, and the need for collaborative support networks which can reduce ongoing risks by providing appropriate, holistic, person-centred pathways towards recovery and healing. For disabled survivors, impairment continues to be perceived as being de facto ill-health, which serves to hide structural inequalities in health. Research shows that disability is an added barrier to accessing health services, not only because of poorer access but also due to discrimination and exclusion.⁶¹

Following the Health and Social Care Act in 2022, Integrated Care Boards (ICB) lead on health commissioning and are essential partnerships that bring together NHS

⁶⁰ Storey, J. E., Pina, A., & Williams, C. S. (2023). The Impact of Stalking and Its Predictors: Characterizing the Needs of Stalking Victims. *Journal of Interpersonal Violence*, 0(0). <https://doi.org/10.1177/08862605231185303>

⁶¹ Inclusion London (2017) [GLA Disability Equality Issues](#)

organisations, local authorities and others to take collective responsibility for improving health and reducing inequalities across local areas. ICBs now have a direct responsibility to address the needs of victims of domestic abuse and sexual violence in published guidance for 'Joint Forward Plans' - a five-year strategy to meet the local population's health needs. This presents a huge opportunity to ensure the health system prioritises the health needs of survivors. Given the introduction of this new specialist area to Boards' remit, it is therefore important that health leaders draw on the expertise in their local areas, and work with local specialist VAWG services to create the best possible response for survivors - including the specific needs of Black and minoritised, D/deaf, disabled and LGBT+ survivors. It was also positive to see both mental health and wellbeing, and the health impacts of VAWG, including a focus on prevention, included as two of the eight priority areas set out in The Women's Health Strategy.⁶² However, this strategy does not yet go anywhere near far enough to enact

⁶² Department of Health and Social Care (2022) [Women's Health Strategy](#)

the changes needed and more work across health is desperately needed.

Mental health

The impact of VAWG on the mental health of survivors can be devastating, and there is a lack of consistent mental health care for survivors and their children in England. In 2023, data analysis showed that women who experience intimate partner violence (IPV) are three times more likely to have made a suicide attempt in the past year, compared to women who have not. Furthermore, sexual IPV is ten times more common in women than men and is an IPV type particularly associated with self-harm and suicidality.⁶³ In 2022, Women's Aid Federation of England's #DeserveToBeHeard campaign⁶⁴ sought to understand what

⁶³ Agenda Alliance (2023) [Underexamined and Underreported: Suicidality and intimate partner violence: Connecting two major public health domains](#)

⁶⁴ Women's Aid. [#DeserveToBeHeard Campaign](#)

survivors value when it comes to mental health support, and what an effective response to domestic abuse looks like.⁶⁵

The seven pillars of suitable mental health support developed by Women's Aid Federation of England are:

1. An empathetic and understanding response;
2. Expertise on the dynamics and impact of domestic abuse;
3. A space to talk;
4. Support for children and young people;
5. Practical support;
6. Women-only spaces, including support led by and for marginalised groups of women; and
7. Timely and long-term support.

For sexual violence and abuse survivors, generic and non-specific mental health support provided by statutory services often overly relies on specific modalities of therapy, particularly cognitive behavioural therapy (CBT), which are

⁶⁵ Women's Aid. (2022) *["Are you listening? 7 Pillars for a survivor-led approach to mental health support."](#)* Bristol: Women's Aid.

often not adequate. Mid to long-term specialist trauma counselling, emotional support and psychoeducational support is required in order for survivors to feel understood, heard, and validated. Interventions around mental health from non-specialists can also have a harming effect, such as pathologising survivors for their normal and natural trauma responses and distress, and giving empirically unsound and controversial diagnoses, such as so-called 'personality disorders'. Mental health services need to understand root causes of distress and mental illness to avoid the potentially dangerous impacts of turning survivors into patients through inappropriate medicalisation that deals with symptoms and not cause. Referrals to specialist Rape Crisis centres and other VAWG services should be followed by appropriate funding pathways.

Adult Social Care

As it stands, existing adult safeguarding processes often fail disabled survivors of VAWG and, in some cases, increase the

risk of harm. VAWG experienced by disabled survivors is poorly recognised or identified by social care and other statutory services. Much VAWG experienced by disabled women is also hidden in safeguarding data, which is poorly disaggregated by gender.

Raising a safeguarding alert can sometimes lead to a survivor obtaining a care package to mitigate the risk. However, D/deaf and disabled people's organisations highlight that:

- Social care professionals often do not know how to approach domestic abuse against D/deaf and disabled women.
- It is rare for adult safeguarding to make Multi-Agency Risk Assessment Conference (MARAC) referrals, as indicated by the small number of referrals by adult social care and mental health services.
- It is rare for adult safeguarding to refer victims to specialist domestic or sexual abuse services, including to 'by and for' organisations.

As a result, most disabled victims whose case is referred to adult safeguarding are denied access to advice, advocacy, re-housing, confidential access to therapeutic services and contact with organisations which understand their culture, faith, sexuality and support their identity as disabled women.⁶⁶ This must change.

Recommendations

- Sustainable investment is required to ensure that all ICBs adopt a 'whole health model'⁶⁷, including evidence-based interventions such as IRIS in GP practices, ADViSE in sexual health clinics and sexual health services, health IDVAs in acute and mental health settings and maternity services, and a specialist coordinator to ensure this work is embedded at a strategic level as well as operationally.

⁶⁶ Stay Safe East (2021) [Stay Safe East Response to the Home Office Call for Evidence on the Violence against Women and Girls strategy 2021-2024](#).

⁶⁷ Standing Together. [Health: Domestic abuse is a public health issue](#)

- Mandatory, regular and in-depth training for GPs and other health practitioners on sexual violence and abuse indicators, particularly in girls and in children more broadly, delivered by sexual violence and abuse specialists. Training should include appropriate safeguarding and referrals to long-term specialist sexual violence and abuse services.
- Mandatory, continuous training on VAWG and mental health for healthcare professionals, delivered by specialists.
- Increased understanding among local commissioners of what mental health support survivors want and value.
- Fully-funded long term, trauma-informed, specialist counselling, therapeutic and psychoeducational support for all survivors of VAWG.
- Specialist mental health support to meet the specific needs of child survivors of VAWG without the fear that this will be used as evidence against the mother in any child contact or child protection proceedings.

- To take a 'social model approach' which addresses disability as a social and economic as well as health issue, and does not assume that disability automatically equates to poor health.
- A duty be placed on adult safeguarding to follow basic safety protocols for victims of abuse by people known to them - such as speaking to the victim without the abuser present, and referring victims to MARAC and specialist VAWG services.
- Adult safeguarding to give victims an automatic right to be supported by an advocate within the safeguarding process, whatever the disabled person's level of capacity.
- Adult and children's safeguarding data must disaggregate all abuse, including the gender of the survivor and perpetrator and relationship to victim (family member, paid or unpaid carer etc.)
- A review of outcomes for disabled survivors of abuse who go through the safeguarding process.

7. Housing

VAWG is a human rights issue which often directly impacts the right to a safe and stable home⁶⁸. For survivors of VAWG, home is often the most dangerous place, and domestic abuse continues to be the leading cause of homelessness amongst women. Housing insecurity and uncertainty is the primary barrier for women attempting to leave their abuser(s).⁶⁹

Homelessness and sleeping rough

Survivors' experiences with housing are often underscored by a fear of homelessness, economic hardship or the prospect of living in unsuitable housing. One respondent in Women's Aid Federation of England's 2020 Annual Audit

⁶⁸ Walker, S-J. and Hester, M. for the Domestic Abuse Housing Alliance. (2019) [Policy Evidence Summary 4: Justice, housing and domestic abuse, the experiences of homeowners and private renters.](#)

⁶⁹ DAHA (2021) Facts and Statistics. Available online.

summed up her current living arrangements as “Horrible living in fear with an abuser but safer with one than on the streets...” Homelessness is a reality for many survivors escaping an abusive partner. Of the 168,780 households who were owed a homelessness duty by their local authority in July 2021 to March 2022, 14% had experience of or were at risk of domestic abuse.⁷⁰

Social housing

A previously largely consistent pathway from refuge into secure – often social – housing, has been undermined by the lack of available social housing, other unaffordable forms of housing and the impact of welfare benefit changes. The situation is particularly acute for migrant survivors due to their exclusion from most forms of social security. The result is that for those women and children able to access a

⁷⁰ Solace Women’s Aid (2022) [Priority Need For Housing For Survivors of Domestic Abuse: One Year On](#)

refuge, they now often leave refuge and move into another form of temporary, move-on or second stage accommodation. The challenges with move-on accommodation also mean that women and children ready to leave refuges are not able to, blocking spaces for survivors who need to escape (bed blocking) and compounding the overall availability of spaces. Even within the pathways that do exist, there remain severe inconsistencies in local arrangements and wider barriers and challenges facing survivors, services and housing providers.

Black and minoritised survivors are disproportionately impacted by poor responses to domestic abuse from statutory agencies. In a study of Black and minoritised survivors accessing a specialist housing support service in London, 52% (out of 69 housing cases between July 2018 and July 2019) had been homeless or threatened with homelessness due to gender-based violence.⁷¹ A report into

⁷¹ Solace Women's Aid (2022) [Priority Need For Housing For Survivors of Domestic Abuse: One Year On](#)

the housing experiences of Black and minoritised survivors in London also found evidence of local housing team “gatekeeping” practices, and that inconsistent testing of vulnerability prevented women from accessing safe, emergency housing. This is also applicable to migrant survivors. The report highlighted:

“Poor vulnerability assessments, carried out on a discretionary basis and failing to properly take account of the vulnerability caused by domestic violence and Black and minoritised women’s intersecting needs and oppressions.”⁷²

The inefficiency and fragmentation of current approaches to move-on accommodation suggests that more coordinated and consistent pathways would help to alleviate pressures on the demand of local housing, as well as stabilise survivors’ journeys to settled and independent lives. The

⁷² Latin American Women’s Aid (LAWA) and London Black Women’s Project (LBWP) in collaboration with the OYA Consortium. (2019) A roof not a home. The housing experiences of Black and minoritised women survivors of gender-based violence in London. London: Latin American Women’s Aid. Available [online](#).

existing model is also financially unviable, incurring significant costs in temporary accommodation. In 2021/2022, councils spent at least £1.6 billion on temporary accommodation for homeless households.⁷³ Clearer local authority allocation schemes are therefore needed to transform our response to the housing needs of survivors.

Joint Social Tenancies

All survivors' safety and housing needs are different, with some survivors requiring access to lifesaving refuges to become safe, while others need to stay safely within their own home to maintain employment, access their children's school, family, and support networks, and maintain stable housing.

Survivors who wish to remain safely within their own home, yet share a joint tenancy with a perpetrator, are often

⁷³ Department for Levelling Up, Housing and Communities (2023) [Local authority revenue expenditure and financing England: 2021 to 2022](#)

dependent on perpetrators to voluntarily remove themselves from the joint tenancy, and if unable to achieve this, they face significant legal barriers which often leaves them homeless and carrying the economic, practical, and emotional burden of starting again.⁷⁴ Without significant legal changes which empower survivors to maintain their tenancy and their home, the ambition of “bringing victims and survivors more security if the right option for them is remaining in their own home” set out in the Tackling Domestic Abuse Plan⁷⁵ cannot be achieved.

Private rented sector

The high cost of renting privately creates a barrier for women leaving and moving on from a relationship with an abusive partner. A recent report found that there is no

⁷⁴ Walker, S-J. and Hester, M. for the Domestic Abuse Housing Alliance. (2019) [Policy Evidence Summary 4: Justice, housing and domestic abuse, the experiences of homeowners and private renters.](#)

⁷⁵ Home Office (2022) [Tackling Domestic Abuse Plan](#)

region in England where private rented housing is affordable on women's median earnings, whereas men can afford to rent a median home (median private sector rental cost) in all regions except London.⁷⁶

Victims of domestic abuse are significantly more likely than other tenants to have anti-social behaviour (ASB)⁷⁷ complaints made against them, often due to the misidentification of domestic abuse as ASB. Victims of domestic abuse are also more likely to be in rent arrears, both as a direct result of economic abuse and due to the economic and practical burden of fleeing abuse and becoming homeless, often with their children (victims in their own right).⁷⁸ With no proposed safeguards currently in place to protect victims from evictions related to domestic abuse, we fear the changes to ASB and rent arrears eviction grounds will lead to harm and homelessness for vulnerable

⁷⁶ Women's Aid. (2020) [The Domestic Abuse Report 2020: The Hidden Housing Crisis](#). Bristol: Women's Aid.

⁷⁷ Jackson (2013), cited by Henderson, K. (2019) p.60. [The role of housing in a coordinated community response to domestic abuse, Durham theses, Durham University](#).

⁷⁸ Gentoo & SafeLives (2018) [Safe at Home: The case for a response to domestic abuse by housing providers](#)

women and children. As a result, victims of domestic abuse may become more dependent on the abuser and face even greater barriers to leaving.

Privately-owned housing

The Office of National Statistics found that 47% of people experiencing domestic abuse lived in privately-owned housing in 2018,⁷⁹ and the Women and Equality Unit (now Government Equalities Office) estimated that at least 10% of repossessions are due to domestic abuse.⁸⁰ Economic abuse perpetrated through a mortgage undermines the victim-survivor's ability to pay it, and an inability to de-link a joint mortgage from an abuser maintains an avenue for economic abuse; limiting a victim-survivor's ability to rebuild

⁷⁹ Office for National Statistics (2018) [Domestic abuse: findings from the Crime Survey for England and Wales: year ending March 2018.](#)

⁸⁰ Walby, S. (2004) [The Cost of Domestic Violence.](#) London: Department of Trade and Industry/Women and Equality Unit.

their life. It is therefore important that steps can be taken to address the abuse and mitigate the economic impacts as they occur.

Perpetrators often refuse to contribute to household costs, which can lead to survivors struggling to cover the costs of a joint mortgage by themselves; and even post-separation, abusers often exploit the rules governing joint mortgages to continue the abuse. This can include withholding consent to switch to better terms or refusing to have their name or that of the survivor removed from the mortgage, even when ordered to do so by the court. Lenders may also refuse to remove the abuser's name from the mortgage, even when the abuser consents, due to affordability requirements. In the most severe cases, this can lead to repossession and homelessness for survivors.

Recommendations

- Improve access to, and availability of, adequate social housing and safe accommodation.

- Clearer local authority allocation schemes to transform our response to the housing needs of survivors.
- Review the freeze on Local Housing Allowance rates to ensure they are linked to market rent levels and availability of housing at those levels.
- Support local authorities to implement the automatic priority need for housing to survivors of domestic abuse including training, co-location of housing IDVAs and administrative burdens funding.
- Exempt survivors of domestic abuse from local connections or residency requirements for applicants of social housing.
- A simplified legal mechanism for survivors of domestic abuse to apply directly to the county court to remove a perpetrator of domestic abuse from a secure or assured social tenancy.
- Improve the use of occupation orders to ensure it is on the perpetrator to leave and the woman to stay, where they want to and it's safe for them to do so.
- Ensure all asylum-seeking women have access to safe and dignified accommodation which recognises

women's specific experiences and needs, while they wait for a decision on their asylum claims.

- Ensure that on receipt of their refugee status, women have appropriate time and support to move onto safe and suitable accommodation (56 days).
- Work with the Financial Conduct Authority to identify and remove regulatory barriers to de-linking financial products, particularly joint mortgages, without the perpetrator's consent; and provide guidance to firms to help them review their internal processes around joint mortgages.

8. Family Courts and Children's Social Care

Family Courts

A common concern raised by victims and survivors of domestic abuse is their treatment by the family

courts.⁸¹ The majority of applications for child arrangements are cases where there are allegations of domestic abuse or other forms of safeguarding concern.

The family courts continue to operate in isolation, being resolutely resistant to changes that would protect women and children from ongoing abuse.

The area of private children law has been a particular focus for criticism, but the problems occur across the entire system. They are, perhaps, more acute in private children law, where women who expect the court to want to protect their children from abuse are horrified to find this is often not the case.

The Harm Report⁸² published by the Ministry of Justice in June 2020 concluded that the Family Court

⁸¹ Women's Aid. (2022) [Two years, too long: Mapping action on the harm panel's findings](#). Bristol: Women's Aid

⁸² Ministry of Justice (2020) [Assessing risk of harm to children and parents in private law children cases](#)

was making orders that place victims of domestic abuse and their children at risk of harm through unsafe contact. There were four key barriers identified and wide-ranging recommendations. The key barriers are:

- The court's pro-contact culture
- The adversarial nature of the court system
- Resource limitations affecting all aspects of private law proceedings
- The lack of coordination with other courts and organisations dealing with domestic abuse

Some of the recommendations have been implemented, but without appropriate resourcing or monitoring in relation to their effectiveness. The Ministry of Justice published a delivery update on Harm Report recommendations in May 2023,⁸³ and

⁸³ Ministry of Justice (2023) [Assessing Risk of Harm to Children and Parents in Private Law Children Cases. - Implementation Plan - delivery update](#)

we are concerned about the lack of progress in the implementation of these recommendations in full.

There is a particular public protection concern in relation to the appointment of experts in the family courts; an issue which was highlighted by the UN Special Rapporteur on VAWG.⁸⁴ The concern is that the court is appointing people who call themselves psychologists to assess adults and children in Family Court proceedings, but who are not qualified to provide those assessments. The issue was recently subject to a judgement from the President of the Family Division, *Re C* ('parental alienation'; instruction of expert) [2023] EWHC 345 (Fam).

The general regulation of the term psychologist and whether there is a broader public protection issue in

⁸⁴ United Nations (2023) [A/HRC/53/36: Custody, violence against women and violence against children, Report of the Special Rapporteur on violence against women and girls, its causes and consequences, Reem Alsalem.](#)

relation to this is a larger issue. However, in the family court, vulnerable adults and children are being psychologically assessed by people who may not be qualified to carry out these assessments. The outcomes will affect them for the rest of their lives and can be devastating.

Victims and survivors must be able to participate effectively in hearings and court processes, but this requires specialist support which currently is too often unavailable. Family Court IDVAs (Independent Domestic Violence Advisors) or support workers provide emotional and practical support to survivors going through the family courts. With specialist understanding, they can help explain the processes to survivors, ensure special measures and/or interpreters are available, and can help to inform risk assessments, alongside providing wrap-around support to victims and survivors. This crucial

provision can improve the experiences of victims and survivors of domestic abuse in the family courts and, ultimately, help to ensure hearings are fair and outcomes are safe.

Recommendations

- Full implementation of the Harm Report recommendations.
- Any changes to processes in the family court, including changes to procedure rules and forms, must be assessed on the basis of their accessibility and impact on unrepresented parties.
- Introduce legislation that psychologists appointed to assess adults or children in the family court must be regulated by the Health and Care Professions Council.
- Prohibit the use of parental alienation or related pseudo-concepts in family law cases and the use of so-called experts in parental alienation and related

pseudo-concepts, in line with recommendations by the UN Special Rapporteur on VAWG.

- The government should urgently amend Section 1(2A) of the Children Act 1989 to make clear that the presumption of parental involvement does not apply in cases involving allegations of domestic abuse or other forms of serious harm.
- The Judicial College should work collaboratively with specialist VAWG organisations to improve judicial understanding and awareness around VAWG, particularly on less recognised forms such as economic abuse as recognised in the statutory definition of domestic abuse in the Domestic Abuse Act 2021. All agencies with responsibility for training family court professionals should work together on the multi-disciplinary training recommended by the Harm Panel.
- Learning and best practice from the Pathfinder pilots⁸⁵ should be developed and considered as a priority so

⁸⁵ Ministry of Justice, HM Courts & Tribunals Service, Lord (David) Wolfson of Tredegar KC (2022),

that it can be channelled into the development of a trauma-informed, child-centred, investigative approach to private law child arrangements that encourages information sharing between agencies and can be replicated in courts across the country. The roll out of this approach should be a key priority for the next government, who should ensure that it is adequately and sustainably funded.

- Enhanced action is needed by the government, the judiciary and His Majesty's Courts and Tribunals Service (HMCTS) to ensure that the newly introduced provisions around special measures in the family courts are understood and implemented at ground level.
- Family court professionals should draw on the expertise of 'by and for' specialist domestic abuse support services in order to gain a better understanding of the specific experiences and needs of survivors and children from marginalised and minoritised groups, and the government must provide ring-fenced funding for these services.

- The Lord Chief Justice, Family Division of the High Court and the government must develop a transparent process where complaints about poor decision making in cases involving domestic abuse or other forms of serious harm can be considered without cost to vulnerable victims and survivors.
- Every survivor of domestic abuse in the family courts should have access to specialist court support. Funding for these roles must not come at the expense of funding for specialist community-based services.

Children's social care

A recent report by AVA on domestic abuse, mothering and child removal⁸⁶ has highlighted the vast amount of work still needed to transform the children's social care response to VAWG, noting that:

⁸⁶ AVA (2022) [Staying Mum: A review of the literature on domestic abuse, mothering and child removal](#)

- Domestic abuse has outstripped parental mental illness or drug and alcohol misuse as the most common underlying factor behind child protection intervention.
- Mothers in repeat care proceedings are more likely than the general population to be facing elevated levels of abuse, experiencing mental health issues, facing housing instability and have no support network.
- Black and minoritised women, disabled women⁸⁷ and women facing poverty, homelessness and other forms of disadvantage, are more likely to face elevated rates of child care proceedings and child removal.
- There is a lack of multi-agency working in the context of supporting mothers facing domestic abuse. Where multi-agency work is set up, it is disjointed with different or conflicting demands made on mothers.
- There is a lack of specialist support services, which leaves mothers facing the removal of their children without the adequate support to leave abusive situations or enter recovery processes.

⁸⁷ Stay Safe East (2021) [Stay Safe East Response to the Women's Health Strategy Call for Evidence](#)

- Mothers are often held solely responsible for child care and protection and end up being perceived as failing to protect their children in cases of domestic abuse.

Survivors with insecure or perceived insecure immigration status are confronted with additional challenges. Whilst Section 17 of the Children’s Act 1989 imposes a statutory duty on local authorities to safeguard and promote the welfare of ‘children in need’ in their area, with the vast majority of cases relating to domestic abuse⁸⁸, many families subject to the No Recourse to Public Funds condition experience poor treatment from children’s social services when they seek support. Interactions with children’s social services are often ‘marred by’ a focus on survivors’ immigration status, with families feeling that authorities only want to get them off their books.⁸⁹ Specialist VAWG services sometimes have to resort to legal challenges to

⁸⁸ Department for Education (2022) [Reporting year 2020: Characteristics of children in need](#)

⁸⁹ Project 17 (2021) [Joint submission to the Independent Review of Children’s Social Care from families with lived experience of engaging with children’s social services whilst having no recourse to public funds.](#)

ensure that children's social services comply with these legal duties. In one three month period, Southall Black Sisters had to challenge local authorities on 18 occasions on their refusal to provide assistance to migrant survivors and their children.⁹⁰ The operation of the 'hostile environment' in children's social care can also undermine migrant survivors' access to safety, as people fear that reporting abuse or seeking help will lead to immigration enforcement action. These fears are justified given data-sharing arrangements with statutory services and the Home Office, with some immigration officers located in children's social services.⁹¹

We are also concerned that there are a number of programmes currently implemented across government which fail to acknowledge the strong likelihood of engagement with survivors and have a concerning lack of domestic abuse and VAWG expertise in their development, such as the Reducing Parental Conflict Programme and the

⁹⁰ Southall Black Sisters (2020) [The Domestic Abuse Bill & Migrant Women](#)

⁹¹ The Guardian (2022) [Immigration officers placed in 25 local authorities by Home Office, FoI reveals](#)

Families First For Children (FFFC) programme. Without this VAWG expertise, these programmes will continue to be unsafe or ineffective. We regularly hear that these programmes are not working for survivors, with inconsistent approaches across local areas and messaging that perpetuates victim-blaming and fails to recognise the seriousness of the harms perpetrated by abusers, who are solely responsible for their actions. Furthermore, the FFFC programme suggests a pro-contact approach, despite the Ministry of Justice’s Harm Panel report⁹² highlighting the harm associated with this, which includes detracting from a child’s welfare and safety.

Recommendations

- Ensure that local authorities are adhering to statutory guidance on the Children Act 1989, including the particular considerations for No Recourse to Public

⁹² Ministry of Justice (2022) [Assessing Risk of Harm to Children and Parents in Private Law Children Cases](#)

Funds children and families as part of their broader Section 17 duties.

- Introduce a firewall between statutory services and the Home Office so that people can seek support without fear of immigration enforcement.
- Children's social care must seek proactive models of support and advice when supporting parents and children affected by VAWG; embedding best practice models that are holistic and trauma-informed.
- In instances where the risk of harm to a child is too great, services supporting mothers to 'cope' with separation are needed, adopting trauma-informed long-term interventions.
- Specialist domestic abuse organisations to quality assure children's social care programmes in terms of training, assessment and screening tools and other materials.
- To bring an end to the Reducing Parental Conflict programme.

9. Criminal Justice Reform

The criminal justice system too often harms victims of VAWG. In recent years, we have seen an alarming downward spiral in domestic abuse convictions.⁹³ This sits alongside multiple reports, inspections, and inquiries exposing how poorly VAWG is addressed⁹⁴, particularly in how rape is investigated and prosecuted.⁹⁵⁹⁶ We have also witnessed the mass exposure of police-perpetrated abuse and further

⁹³ End Violence Against Women Coalition (2022) [Latest CPS data shows a justice system still failing women, with an alarming downward spiral in domestic abuse convictions](#)

⁹⁴ Suzy Lamplugh Trust (2022) [Super-complaint submitted on police response to stalking](#)

⁹⁵ Centre for Women's Justice, the End Violence Against Women Coalition, Imkaan, Rape Crisis England and Wales (2023) [What's Changed?: Government's 'End-to-End' Rape Review - Two Years on](#)

⁹⁶ Centre for Women's Justice, End Violence Against Women Coalition, Imkaan and Rape Crisis England and Wales (2020) [The Decriminalisation of Rape: Why the justice system is failing rape survivors and what needs to change](#)

revelations about the scale of misogyny, sexism, racism, homophobia and ableism within policing. These issues have most recently been illustrated by the Casey Review, but have long been raised as long-standing systemic issues, particularly by Black and minoritised communities.⁹⁷ The Casey Review's findings are only the latest revelations about the extent to which the police are failing in their duties to women and girls, with numerous recommendations highlighting the need for wide-ranging change.

Tackling these issues requires long-term and dedicated work, and we are realistic in our expectations: there are no quick fixes. Systemic transformation requires ongoing and renewed commitment from police officers, prosecutors, government and senior leaders in the criminal justice system and in those in government. It will also rely on serious reflection about what justice means for victims and survivors of VAWG.

⁹⁷ Centre for Women's Justice, the End Violence Against Women Coalition, Imkaan, Rape Crisis England and Wales (2023) [What's Changed?: Government's 'End-to-End' Rape Review - Two Years on](#)

The number of victims who withdraw from pursuing their cases at both the police stage and post-charge stage remains high. In relation to rape and sexual violence cases, much hope lies in the successful implementation of Soteria and the new National Operating Model⁹⁸ in particular – and it is vital that its potential is not scuppered by inadequate funding or lack of independent oversight. It is also essential that these new policing practices are implemented by the military police in their handling of military sexual crime, if these cases continue to be investigated separately from the civil authorities. Currently, however, survivors continue to be harmed by a system which exposes them to sexist and other discriminatory attitudes, victim-blaming, disbelief and intrusive requests for personal data which infringe on their privacy and other rights. This is compounded by persistent court delays, a lack of support available to victims in court, and the record high Crown Court backlog, with rape survivors facing years-long waits for court dates. Cases involving VAWG are often complex and require staff to have

⁹⁸ End Violence Against Women Coalitio (2023) [Soteria rolled out nationally, while Rape Review update overstates government progress](#)

specialist knowledge of the issues to ensure the right information is available to decision-makers, but de-prioritising these cases in an attempt to clear court backlogs creates additional delays for some of the most distressing crimes, overwhelmingly experienced by women. The resulting rescheduling of trials and lack of appropriate support available to victims throughout their engagement with the system causes significant distress and often the re-traumatisation of victims.⁹⁹

There is also long-standing evidence about inequalities in access and outcomes for Black and minoritised survivors engaged with the criminal justice system, and progress is mired by basic failures to monitor inequalities with disaggregated data in order to work towards resolving the problems.¹⁰⁰ For disabled survivors, abuse by paid and

⁹⁹ Standing Together (2023) [National Specialist Domestic Abuse Court Mapping - Findings Report 2023](#)

¹⁰⁰ Centre for Justice Innovation and Standing Together (2023) [‘A safe place and a safe time’: Providing effective advocacy to Black and Minoritised](#)

unpaid carers who are not family members is not recognised in law or in practice as domestic abuse.

Women in contact with the criminal justice system usually face considerable intersecting disadvantages. More than half (57%) of women in prison report having experienced domestic violence, and 53% report having experienced emotional, physical or sexual abuse during childhood.¹⁰¹ A third of women in prison were in care as children.¹⁰²

Women in prison have usually committed non-violent offences driven by intersecting disadvantages such as substance misuse, mental health issues, homelessness or poverty. As a result, women and girls tend to serve short sentences or are on remand, needlessly disrupting their lives and failing to address the root causes of their

[victim-survivors of domestic abuse and harmful practices in contact with the criminal justice system](#)

¹⁰¹ Prison Reform Trust. (2017) ["There's a reason we're in trouble: domestic abuse as a driver for women's offending."](#)

¹⁰² Ministry of Justice (2012) [Prisoners' childhood and family backgrounds Results from the Surveying Prisoner Crime Reduction \(SPCR\) longitudinal cohort study of prisoners](#)

offending. This has adverse impacts on their families. Furthermore, many women and girls' offending is directly linked to experiences of VAWG or domestic abuse, but they cannot access systems of support to account for these drivers. Policy committing to create 500 additional prison places for women¹⁰³ will only compound the complex situations many women and girls find themselves in and increase the likelihood of them becoming caught in a cycle of reoffending, due to increasing impacts of the multiple disadvantages they face. Breaking this cycle will require investing in gender and trauma-informed responses across the criminal justice system, accounting for the trauma and abuse many women may have experienced when criminalising and sentencing women, and reinvesting funds in community services such as women's centres to provide women with the support they need to divert them from offending and live safer lives.

¹⁰³ The Guardian (2021) [Ministers criticised for plans to create 500 new UK prison places for women](#)

Far too many survivors of VAWG are criminalised by a criminal justice system which, lacking a gender and trauma-informed approach, often fails to take into account the violence and abuse which has led women to offend. Police officers often fail to distinguish between perpetrator and victim when counter-allegations are made. Furthermore, the CPS does not sufficiently take into account the public interest and their own guidance on coercive control; making decisions to prosecute those coerced into offending, and the defences of self-defence and duress are not working for such women when charged. Those who are convicted of crimes as a consequence of abuse and sexual exploitation suffer lifelong disadvantage and stigmatisation because of convictions remaining on the record.

Recommendations

- Establish a national scheme of independent legal advice for survivors of rape and sexual abuse engaged with the criminal justice process.¹⁰⁴
- Introduce better protection for survivors' counselling and therapy records, with a higher legal threshold for disclosure and decision-making by a judge.¹⁰⁵
- Ensure access to Specialist Domestic Abuse Court measures for all victims, particularly effectively clustering cases to ensure culturally-sensitive victim advocacy in court.
- Ensure fast-tracked, priority listing and guaranteed fixture of rape and sexual offences trials.

¹⁰⁴ Rape Crisis England & Wales, Centre for Women's Justice, End Violence Against Women Coalition (May 2023) [Independent Legal Advice and Representation for Survivors of Sexual Violence and Abuse](#)

¹⁰⁵ Rape Crisis England & Wales, Centre for Women's Justice, End Violence against Women Coalition (2023) [Keep Counselling Confidential: The Problems and Solutions with the Disclosure of Counselling Notes](#)

- Ensure availability of specialist sexual offence courts where all staff receive trauma-informed training and special measures as default.¹⁰⁶¹⁰⁷
- Commission independent research into who and who does not access the justice system, and the reasons for this.
- Research what rape and sexual abuse victims and survivors actually want from the justice system, from other agencies, and from, their communities. This is vital to assisting public policy development in this area.
- Repeal the 'carers' defence' for the offence of controlling or coercive behaviour in intimate or family relationships.¹⁰⁸

¹⁰⁶ Rape Crisis England & Wales (2023) [Breaking Point: the re-traumatisation of rape and sexual abuse survivors in the Crown Court backlog.](#)

¹⁰⁷ Centre for Women's Justice, the End Violence Against Women Coalition, Imkaan, Rape Crisis England and Wales (2023) [What's Changed?: Government's 'End-to-End' Rape Review - Two Years on](#)

¹⁰⁸ Stay Safe East (2021) [Domestic Abuse Bill Proposed Amendments: Disabled Survivors](#)

- Introduce Banaz's Law to make the use of 'honour' an aggravating factor in sentencing on so-called honour-based abuse and VAWG.¹⁰⁹
- Make training on controlling or coercive behaviour, including less recognised forms such as economic abuse, mandatory for the police, judges and other criminal justice agencies, to ensure that evidence gathering is robust, survivors are properly supported and perpetrators are held to account for their crimes.
- Give survivors the right to have the court consider making a compensation order and increase the use of the confiscation of assets derived from criminal conduct during sentencing so they do not have to pay the price for abusers' crimes.
- Ensure greater gender, age and trauma-responsiveness throughout the justice system - from policing through prison and probation - accounting for the ways in which

¹⁰⁹ Mahmood, B and Siddiqui, H (2022) No Safe Place: Murdered by Our Father <https://www.amazon.co.uk/No-Safe-Place-Murdered-Father/dp/1913543056>

experiences of VAWG and domestic abuse can drive offending.

- Ensure each police and crime area has independent and specialist VAWG service for survivors of police-perpetrated abuse.
- Introduce more robust police vetting and suspension pending investigation for all officers charged with VAWG-related misconduct.
- Reform law and practice to ensure survivors of VAWG are not unjustly criminalised, but instead receive equal access to support and protection, including:
 - Introduce reforms to the defence of 'self defence' and a new statutory defence for victims of domestic abuse who offend, modelled on that available for trafficking victims under the Modern Slavery Act.
 - Repeal s1 Street Offences Act 1959 (offences of soliciting and loitering) and introduce a system for expunging such criminal records from the police national computer.

10. Perpetrators

The next government should focus on reducing the harms caused by perpetrators and managing any ongoing risks they pose, alongside more concerted commitment to rehabilitation. This must happen alongside action to prevent violence in the first place (see section 3 on prevention). The response must change from one that places the responsibility for survivors to manage their experiences of violence and abuse, to one which holds perpetrators accountable. It is estimated that only 1% of perpetrators of abuse get any kind of intervention to address their behaviour, and perpetrators continue to receive interventions that are neither quality assured nor safe.¹¹⁰

A very small proportion of perpetrators are currently in the criminal justice system, and those who are are often insufficiently held to account, with important opportunities for their rehabilitation and risk management frequently

¹¹⁰ Drive Project (2019) [Call to Action for a Domestic Abuse Perpetrator Strategy](#)

missed.¹¹¹ Significant reform is required to ensure that the criminal justice system brings perpetrators to justice. In addition, other agencies outside the criminal justice system need to vastly improve their identification and responses to perpetrators.

Over 125 organisations from across the statutory, voluntary and academic sectors have come together to articulate a vision of what a more strategic response to domestic abuse perpetrators would look like in a 'call to action'. However, further work is needed on developing responses across the whole spectrum of VAWG. Additionally, further work is needed to develop quality interventions across all forms of VAWG and ensure that victims of perpetrators from minoritised groups are not excluded from the benefits of effective perpetrator work.

Recommendations

¹¹¹ HM Inspectorate of Probation (2018) [Domestic abuse: the work undertaken by Community Rehabilitation Companies \(CRCs\)](#)

- Ensure that quality assured perpetrator interventions are consistently available – addressing risks from primary prevention (like bystander responses and awareness raising communication campaigns) to behaviour change group work, to specialist responses for the most dangerous and serial perpetrators.
- Support effective victim-centred quality assurance systems for perpetrator work which ensures that interventions funded by public sector agencies are always accredited, designed to keep survivors and their children safe, and delivered alongside survivor support provided by specialist VAWG organisations.
- A whole systems approach must include well-published and accessible helplines for those using harmful behaviour.
- Ensure better alignment between civil and criminal systems ensuring family courts do not place child victims of domestic abuse in the home of the abuser.
- Deliver effective leadership and multi-agency arrangements, ensuring all government departments and public services are actively holding perpetrators

accountable, that professionals are trained to identify and respond to perpetrators, and there are clear pathways into safe and effective perpetrator interventions.

- Review the effectiveness of sexual harm prevention orders given that criminal justice neither sanctions nor deters the vast majority of offenders.
- Connect sexual violence and domestic abuse offences to any new online harms strategy, where a large amount of connected 'online offending' takes place and where new forms of abuse are rapidly emerging and expanding.