



VIOLENCE AGAINST WOMEN AND GIRLS IN THE UK

EVAW COALITION BRIEFING FOR RASHIDA MANJOO

**UN Special Rapporteur on Violence Against Women and Girls, its
causes and consequences**

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EVAW

The End Violence Against Women Coalition is a unique coalition of organisations and individuals campaigning to end all forms of violence against women. EVAW was set up in 2005 when women's organisations and others came together to lobby the governments around the UK at all levels to take a more strategic approach to ending violence against women, including making a commitment to making prevent a central plank of its response. EVAW continues to lobby all levels of government in the UK, and we challenge the wider cultural attitudes that justify, minimise and condone violence against women.

This set of briefing papers has been prepared with input from EVAW member organisations to bring together their expertise across a range of violence against women and girls (VAWG) related issues on the key current issues and challenges, their assessments of current government policy and practice, and their recommendations, in order to progress prevention and response to VAWG in the UK, and improve the human rights outcomes for women and girls.

EVAW Members

[Amnesty International UK](#), [Ashiana Network](#), [Asylum Aid](#), [Black Association of Women Step Out \(BAWSO\)](#), [Bristol Fawcett](#), [Bristol Feminist Network](#), [British Humanist Association](#), [Child and Woman Abuse Studies Unit \(CWASU\)](#), [Durham University](#), [Eaves for Women](#), [Equality Now](#), [Fawcett Society](#), [Forward](#), [Imkaan](#), [Iranian and Kurdish Women's Rights Organisation \(IKWRO\)](#), [Jewish Women's Aid](#), [Lancaster University](#), [Latin American Women's Aid \(LAWA\)](#), [London Feminist Network](#), [National Association of Schoolmasters Union of Women Teachers \(NASUWT\)](#), [National Alliance of Women's Organisations \(NAWO\)](#), [Newham Asian Women's Project](#), [National Federation of Women's Institutes \(The WI\)](#), [National Union of Students \(NUS\)](#), [Object](#), [Young Women's Trust](#), [Rape Crisis England and Wales](#), [Refuge](#), [Respect](#), [Rights of Women](#), [National Union of Rail, Maritime and Transport Workers \(RMT\)](#), [NIA](#), [University of Roehampton](#), [Scottish Women's Aid](#), [Shakti Women's Aid](#), [South Essex Rape and Incest Crisis Centre \(SERICC\)](#), [Solace Women's Aid](#), [Southall Black Sisters](#), [Standing Together Against Domestic Violence](#), [Surviving Economic Abuse](#), [Tender](#), [Trade Union Congress \(TUC\)](#), [Unison](#), [Women's Budget Group](#), [Welsh Women's Aid](#), [White Ribbon Campaign](#), [Womankind Worldwide](#), [Women in Prison](#), [Women's Aid](#), [Women's Aid Federation Northern Ireland](#), [Women for Refugee Women](#), [Women's Resource Centre](#), [Zero Tolerance](#) .

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Individual contributions from EVAW member organisations form the basis of this briefing.

Those contributions are attached in the Appendices, for more detailed information on specific areas of concern, and examples of good practice.

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1. Snapshot of VAWG in the UK

Overview of progress

- 1.1 Over the last decade, progress has undoubtedly been made in many areas to respond more appropriately to VAWG in the UK. EVAW welcomed the development and implementation of the Westminster Government's [Call to End Violence Against Women and Girls](#) in 2010, led by the Home Office, following on from the first VAWG strategy introduced in 2009. A *Call to End VAWG* sets out a central framework for VAWG with corresponding Action Plans, reviewed on a regular basis, which helps identify particular difficulties and challenges in implementation.
- 1.2 EVAW also welcomes engagement with the Westminster Government through the Inter-Ministerial Group and the Stakeholder Group on VAWG, an important forum to exchange information and expertise, and to evaluate and identify ways to improve the *Call to end VAWG* and the VAWG Action Plan. The Home Office, which takes the [lead across the Westminster Government on VAWG](#), launched a revised Action Plan on 8 March of this year. EVAW has welcomed the opportunities to feed in to the reviews and recommend areas of focus in the revised plan. However, it is disappointing that the Westminster Government has not recognised in the revised Plan EVAW's arguments that arrangements for the commissioning of services are jeopardising the sustainability and provision of dedicated and specialised VAWG services.
- 1.3 The *Call to End VAWG* provides a much needed and welcome framework for Westminster policy and action on VAWG. However, it falls short of being a comprehensive, cross-government strategy, bringing together a co-ordinated response across the whole of the UK as required by international conventions. It does not include trafficking, and there is little reference to prostitution or to sexual harassment.
- 1.4 Devolution: The Northern Ireland Assembly, and parliaments in Scotland and Wales exercise power devolved to them from Westminster. The Westminster Government retains overall responsibility for ensuring UK-wide compliance with the UN Conventions. EVAW welcomes the increased opportunities devolution provides for tailoring state responses to local need, but remains concerned that standards of compliance and response vary across the four countries of the UK.¹ This briefing provides an overview of issues in Scotland, Northern Ireland and Wales where possible. Organisations based in Scotland, Northern Ireland and Wales are best placed to provide expertise on VAWG issues specific to their context.
- 1.5 Scotland has been proactive at taking forward work to tackle VAWG, including protection, provision of support and services for those who have or are experiencing violence, and measures for prevention are cited as national priorities. The Scottish

¹ Extracts from the Memorandum of Understanding that govern the devolution arrangements are included in Appendix 1. These extracts explain the overarching legal responsibility and how responsibility for international agreements is managed. The full memorandum can be accessed at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/79366/Memorandum_of_Understanding_and_Supplementary_Agreements.pdf

Government and COSLA (the Convention of Scottish Local Authorities) are currently in the process of developing a national strategy aimed at tackling all forms of VAW, which will be published in Summer 2014.

1.6 In 2009, the Wales Violence Against Women Action Group, a coalition of organisations came together to campaign for stronger action to tackle violence against women in Wales, publishing a report *'Why an Integrated Strategy in Wales?'* outlining the challenges and providing recommendations required to deliver real change to the lives of women in Wales. In 2010 the Welsh Government introduced ['The Right to be Safe – A strategy to tackle violence against women and girls'](#). The Welsh Government has also recently consulted on legislation to eliminate violence against women, domestic abuse and sexual violence.²

1.7 The Northern Ireland Executive adopted a strategy *'Tackling Violence at Home: A strategy for addressing domestic violence and abuse in Northern Ireland'* in 2005, with the latest [Action Plan](#) on Tackling Domestic, Sexual Violence and Abuse 2012-2013.³

1.8 Even with these initiatives, the UK is still not responding effectively to the extent of VAWG as it affects the day-to-day lives of many women and girls.

Prevalence of VAWG in the UK

- In 2012 around 1.2 million women suffered domestic abuse, over 400,000 women were sexually assaulted, 70,000 women were raped and thousands more were stalked.⁴
- 18,915 sexual crimes against children under 16 were recorded in England and Wales in 2012/13.⁵
- In 2013, the Government's Forced Marriage Unit (FMU) gave advice or support related to a possible forced marriage in 1302 cases. 82% of cases involved female victims.⁶
- At least 66,000 women in England and Wales have been subject to female genital mutilation.⁷
- Sexual bullying and harassment are routine in UK schools. Almost one in three 16-18 year-old girls have experienced 'groping' or other unwanted sexual touching at school (EVAW 2010).
- In 2011/12, the police reported nearly 800,000 incidents of domestic violence. With domestic violence accounting for 10% of emergency calls.⁸

²http://www.welshwomensaid.org.uk/index.php?option=com_content&view=article&id=391&Itemid=376

³ <http://www.dhsspsni.gov.uk/dom-vio-plan.pdf>

⁴<https://www.gov.uk/government/policies/ending-violence-against-women-and-girls-in-the-uk>

⁵http://www.nspcc.org.uk/Inform/resourcesforprofessionals/sexualabuse/statistics_wda87833.html

⁶<https://www.gov.uk/forced-marriage> Statistics on Forced Marriage for 2013

⁷Dorkenoo et al, 2007

⁸ ONS, 2013. The police record domestic abuse incidents in accordance with the National Standard for Incident Recording (NSIR) but they are not accredited national statistics and hence not subject to the same level of quality assurance as in the main recorded crime collection. In the year reported on here, the police did not record incidents of domestic violence where the victim was 16 or 17 years.

Additional information from Labour party under Freedom of Information requests Feb 2013 cited at http://www.womensaid.org.uk/domestic_violence_topic.asp?section=0001000100220041§ionTitle=Domestic+violence+%28general%29

1.9 On 5th March 2014, the European Union Agency for Fundamental Rights (FRA) published a Europe-wide survey on VAWG. The findings illustrate that the UK has high prevalence of VAWG, with 44% of respondents to the survey reporting having experienced physical and/ or sexual violence by a partner and/or a non-partner since the age of 15, the EU average for the survey was identified as 33%. The UK cannot be complacent about fulfilling its international obligations to end VAWG. The FRA survey underscores the importance of ratifying and implementing the Council of Europe Convention on VAWG (the Istanbul Convention).

Domestic Violence

1.10 Domestic violence remains one of the most pervasive forms of violence against women. The statistics for domestic homicides indicate an average of two women each week being murdered by their partner or former partner.⁹

1.11 Following campaigning by groups including Women's Aid and Refuge, Home Secretary Theresa May announced a review into the way police in England and Wales deal with cases of domestic violence. Her Majesty's Inspectorate of Constabulary (HMIC) are looking at Forces' performances and identifying where improvements need to be made, including whether victims thought to be at risk are managed appropriately, reporting back to the Home Office in April 2014. The decision for this review followed the murders of two women who were killed by their former partners and both perpetrators had a history of violence against women. Claire Wood was murdered by ex-boyfriend George Appleton at her home in Salford and Maria Stubbings was murdered by Marc Chivers at her home in Chelmsford, Essex. A year earlier he had been freed from a German prison where he had served 15 years for murdering his then girlfriend, Sabine Rappold.

1.12 There is a similar picture of institutional failures to protect women from intimate partner violence revealed in many of the Domestic Homicide Reviews (DHRs) undertaken in the last three years. That so many investigations by the Independent Police Complaints Commission (IPCC) have revealed evidence of serious failure in the police response to victims of domestic violence means that this body has made 'deaths and serious injury as a result of gender abuse and domestic violence' a priority area of work, reflecting the huge volume of referrals it receives in relation to this issue.¹⁰

1.13 This gap in terms of due diligence is also evidenced in a number of Serious Case Reviews into child deaths. An overview found that domestic violence was a factor in the lives of 63% (n=88) children who were seriously harmed or killed between 2009-2014¹¹, and that protection of the woman was rarely the focus of intervention. In 2013, the Home Office published a summary of the 'common themes' across 54 DHRs highlighting:

⁹ Coleman and Osborne, 2010; Povey, ed. 2004, 2005; Home Office, 1999; Department of Health, 2005.

¹⁰ Between April 2010 and March 2013 the IPCC investigated 33 cases where there were concerns that the police may have failed to adequately protect a victim of domestic violence

¹¹ Brandon, M et al *New Learning from Serious Case Reviews: A two year report for 2009-2011*. Belderson P, Hawley C, Ellis C, Megson M

awareness and understanding of the issue; training for healthcare professionals; risk assessment and risk management; information sharing and multi-agency working; awareness of the safeguarding needs of children.¹²

1.14 The focus on inter-agency and information sharing has, in our view, over-ridden the basic issue of the failure of police to fulfil their responsibility to protect women from violence. In many cases multiple calls had been made that had not been responded to. A key problem here is the 'incident' framing of domestic violence and the model of risk assessment which has become a core of current responses. Neither take the pattern of coercive control as a core and critical feature of intimate partner violence sufficiently seriously.

1.15 Significant variations have also been reported across England and Wales in the way police and prosecutors deal with cases of domestic violence. In Cheshire in 2013 33% of domestic violence cases recorded as an offence were referred by police to prosecutors, with 21.47% in Dyfed Powys. In Warwickshire, however, the figure was 3.56% and in North Wales, 5.25%.

1.16 These figures, illustrate significant variations in how police and the Crown Prosecution Service prosecutors proceed with cases, and whether they are referred to the courts, illustrating that protection and access to justice is inconsistent. It is therefore likely that the experience of those reporting domestic violence will vary depending on where they live, and the attitude and performance of their local police force.¹³

Child sexual exploitation

1.17 On-going revelations on the scale of sexual offending of celebrities like Jimmy Savile, continue alongside the exposure of the systemic failings of police and other frontline agencies to recognise and respond to clear warning signs and allegations of abuse by partners. Cases of young girls groomed into sexual exploitation and facing rape, abuse and harm have exposed further chronic errors in child protection systems that are failing young women and girls with devastating consequences. The cases are reported across different local areas illustrating a pattern of abuse that is: nation wide; that predominantly impacts on women and girls, and is perpetrated by men and boys.

1.18 In December 2013, a report into the state handling of cases in Rochdale identified a catalogue of errors resulting in an acknowledgement by Greater Manchester Police that the force had let down a number of vulnerable girls who were groomed by gangs for sexual abuse.¹⁴ Whilst the men involved were jailed¹⁴ for between 4 and 19 years in 2012 for the abuse of 5 girls, some as young as 13, it is believed there may be up to 50 victims in all. Similar cases have been investigated in Oxford, Leicester and in Birmingham. Such cases are typically followed by statements of regret and commitment to root and

¹² Home Office (2013) *Domestic Homicide Reviews: Common Themes Identified as Lessons to be Learned* (2013). London: Home Office.

¹³ <http://www.bbc.co.uk/news/uk-26521078>

¹⁴ The Rochdale Safeguarding Children Board Serious Case Reviews. <http://www.rbscb.org/news.aspx?ID=23>

branch reviews, yet it is women and girls that continue to bear the brunt of these serious failings.

1.19 The extent of the problematic attitudes and inadequate responses towards girls who report such abuse was exposed during interviews with the BBC Radio 4's Woman's Hour where one girl, who was first raped at age 13 following being groomed by a group of men, told her story of persistent abuse, saying "once they've got you, they won't let you go". Despite the girl and her family reporting the assaults to the police, no-one faced criminal prosecution for this particular case. Her father told the interviewer, "We thought, what do we do to stop this situation? We went to the police again, they arrested these people, they got the evidence, it went to the CPS, they said there wasn't enough evidence, so how far can you go with it? So we thought what options are there for us as parents? And we decided to leave the country quite simply. What kind of society do we live in when the police and the social services can't protect these young girls?"¹⁵

1.20 The Deputy Children's Commissioner for England conducted an [Inquiry](#) into Child Sexual Exploitation in Gangs and Groups¹⁶, and found that despite increased awareness, children are still slipping through the net. Between August 2010 and October 2011, a total of 2409 children were known to be victims of child sexual exploitation, with 16,500 children and young people at risk. Whilst serious gaps remain in the knowledge, practice and services required to tackle child sexual exploitation, this illustrates part of the continuum of VAWG and a pattern of violence and abuse that disproportionately affects girls.¹⁷

1.21 In Scotland, following a petition by Barnardo's Scotland on tackling child sexual exploitation, the Public Petitions Committee of the Scottish Parliament held an inquiry into child sexual exploitation in Scotland, issuing its first [report](#) in early 2014. The main recommendation from the inquiry was that the Scottish Government should develop a national strategy for tackling child sexual exploitation, to provide a framework for a co-ordinated national approach to tackling and preventing child sexual exploitation and supporting victims.

1.22 In late 2013, NSPCC Scotland raised concerns over an increase in calls to its helpline and a rise in the number of sexual offences against under 13s. Figures from the charity's helpline for concerned adults show that sexual abuse accounted for 13% of calls that resulted in a referral, and 26% of calls that resulted in advice in 2012/13. Compared with 2011/12, this represented a 68% increase in referral figures and an 83% increase in advice contacts. A total of 3,369 sexual offences against children were recorded by Police Scotland, with a quarter of these having been committed prior to December 1, 2010.¹⁸

1.23 The figures from NSPCC Scotland, and those from the Scottish Government illustrate an increase in reporting of sexual offences, but also a significant gap between those who report to the police and those who seek help outside the criminal justice system.

¹⁵ <http://www.bbc.co.uk/programmes/b00tt4lp> and <http://www.bbc.co.uk/programmes/b03vqq1v>

¹⁶ <http://www.childrenscommissioner.gov.uk/info/csegg1>

¹⁷ http://www.childrenscommissioner.gov.uk/content/latest_news/content_96

¹⁸ cited in www.bbc.co.uk/news/uk-scotland-25712247

Sexual violence and bullying

- 1.24 Over recent years, surveys have also exposed worryingly high levels of sexual violence, bullying and intimidation amongst children. A YouGov Poll carried out by EAW in October 2010 found that almost one in three 16-18 year old girls surveyed had experienced unwanted sexual touching at school.¹⁹ Research by the National Society for the Protection of Children from Cruelty (NSPCC) a year earlier found that one in three teenage girls who had some kind of relationship experience, had experienced sexual violence from a partner.²⁰ More recent studies have found high levels of exposure to harmful behaviours online and concerns around 'sexting' amongst children including abusive and coercive behaviour by boys.²¹
- 1.25 Daily sexist, sexualised and violence-condoning messages in the media and online create conducive contexts for violence, reinforce gender inequalities and undermine work to prevent VAWG.

Specialist support for survivors

- 1.26 Recent cases highlighted in the media this year alone illustrate the specialised support victims and survivors need, regardless of when the abuse occurred. In February 2014, Tracy Shelvey jumped to her death in Rochdale, Greater Manchester after her alleged attacker was cleared of rape. This came a year after Frances Andrade also took her own life during the trial of Michael Brewer, who was later convicted of sexually assaulting her years earlier when she was a pupil at Chetham School of Music.
- 1.27 Also in February, a mother told the Coroner inquiring into the suicide of her daughter, Corporal Anne-Marie Ellement, that she had become depressed after the Army decided it was not going to charge two male soldiers she alleged raped her in 2009. Corporal Anne-Marie Ellement died on October 9 2011. These examples illustrate failures with respect to protection within the Criminal Justice process, and in particular a lack of procedural justice.

Female Genital Mutilation

- 1.28 Some forms of VAWG have received welcome attention following campaigning by women's groups, for example on FGM; however, despite legal changes in 2005, no criminal prosecutions have been brought against perpetrators, although a [prosecution](#) was announced on 21st March 2014. Many girls continue to face the threat of FGM. Government action to prevent and respond appropriately has been historically lacking, however, Lynne Featherstone MP, International Champion on VAWG overseas, announced a new programme of funding whilst at the UN Commission on the Status of

¹⁹ End Violence Against Women and Yougov poll of 16-18 year olds (October 2010)

²⁰ Barter et al, *Partner exploitation and violence in teenage intimate relationships*, NSPCC (2009). http://www.nspcc.org.uk/Inform/research/findings/partner_exploitation_and_violence_wda68092.html

²¹ http://www.nspcc.org.uk/inform/resourcesforprofessionals/sexualabuse/sexting-research_wda89260.html

Women in 2013, worth up to £35 million, which is expected to reduce FGM by 30% in at least 10 priority countries in the next 5 years.²²

1.29 On 6 February 2014, the Home Office issued a declaration to end FGM in the UK and abroad, to mark the International Day of Zero Tolerance to FGM. This declaration commits to further action by the Home Office, the Department of Health, the Crown Prosecution Service and the Department for Education.²³

1.30 Speaking to the Guardian newspaper on the same day, Leyla Hussein, a survivor and campaigner who presented *The Cruel Cut* on Channel 4, said “guidelines are not statutory, implementation is disjointed, funding is minimal, education is patchy, and nobody is holding anyone to account...Until we have a better system in place, I guarantee in 10 years' time we'll be having the same conversation”.²⁴

1.31 Issues that disproportionately affect BME women and girls are often treated as separate from VAWG. Furthermore, there are particular groups of women and girls who are often overlooked in policy making, and where there is insufficient information and data, in particular BME women, women with mental health needs, women with insecure immigration status, older women, women with disabilities including learning disabilities, girls in or leaving care.

Forced Marriage

1.32 EAW welcomed the UK's signature to the Council of Europe Convention on Violence Against Women and Domestic Violence (the Istanbul Convention), and encourages ratification at the earliest opportunity. The Westminster Government has stated that it is taking steps to pave the way for legal compliance with the Istanbul Convention. This includes creating a specific forced marriage offence.

1.33 Forced marriage is found particularly in some migrant communities, and is a gendered phenomenon that affects more women than men. It can occur when girls or young women are taken to the family's country of origin for a holiday and often affects lesbians and people with learning disabilities. As with FGM, it is important to empower communities to abandon the practice, and empower young women to understand and access their rights. We also wish to see better training of frontline professionals to recognize forced marriage and offer support to victims.

1.34 Many campaigners working around the issue have noted that existing legal frameworks, including criminal sanctions, have not been full utilised. Campaigners have also expressed concerns that efforts to address this form of VAWG will remain within the context of criminal justice, whereas investment in prevention measures, education, awareness raising, specialist support are all required in order to address both the causes and consequences of this manifestation of VAWG.

²² <https://www.gov.uk/government/news/uk-to-help-end-female-genital-mutilation>

²³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277909/140205_HMG_FGM_declaration_-_FINAL.PDF

²⁴ <http://www.theguardian.com/society/2014/feb/06/female-genital-mutilation-foreign-crime-common-uk>

1.35 Whilst some good initiatives have been adopted, the pattern of government response falls short of their due diligence obligations to act with care, effort and effectiveness, in order to improve the lives of women and girls.

1.36 Improved measures, particularly funding, are very much needed to prevent and respond to VAWG, placing the human rights and well being of all victims and survivors within the UK's jurisdiction, regardless of their migration status, at the forefront of all policy and practice.

2. Context of UNSRVAW UK visit

2.1 The visit of Ms Rashida Manjoo, the UN Special Rapporteur on Violence Against Women, Its Causes and Consequences, comes during a year of local elections in the UK, a year ahead of the UK's next general election, and as the Scottish Government prepares for a referendum on independence on 14 September 2014.

2.2 The UK Government submitted their State Party report to the UN Committee on the Elimination of all forms of Discrimination Against Women in July 2013, and was issued with concluding observations from the Committee on areas requiring further attention including on VAWG. These included:

- The impact of the Legal Aid, Sentencing and Punishment of Offenders Act (2012) and restriction of women's access to legal aid and conditions regarding proof of abuse for victims of violence. The Committee also noted with concern reports that these limitations could push women, particularly ethnic minority women, into informal community arbitration systems, including faith-based tribunals. EAW members share these concerns,
- The prevalence of stereotypical imagery and objectification of women by the media as confirmed by the Leveson Inquiry. EAW, together with member organisations Eaves, Equality Now and Object, gave evidence to the Leveson Inquiry on this particular issue. The [Leveson Inquiry](#) commenced after the Prime Minister announced a two-part inquiry investigating the role of the press and police in phone hacking, Part 1 of the Inquiry examined the culture, practices and ethics of the press.²⁵ The subsequent report of the Inquiry included a section on representation of women (at page 660), and stated that evidence from EAW, Object, Equality Now, and Eaves suggested "tabloid press often failed to show consistent respect for the dignity and equality of women generally, and that there was a tendency to sexualise and demean women".

²⁵ <http://webarchive.nationalarchives.gov.uk/20140122145147/http://www.levesoninquiry.org.uk/>

²⁵ CEDAW /C/GBR/CO/7 26 July 2013 Concluding Observations on the 7th periodic report of the United Kingdom of Great Britain and Northern Ireland.

- The need for public awareness campaigns and intensifying efforts to train police in particular, to eliminate prejudices concerning the credibility of victims of domestic violence,
- Revise legislation to prohibit corporal punishment of children in the home,
- Implementation of laws on FGM.
- The lack of a comprehensive national framework on trafficking and weaknesses in referral systems.²⁶ In 2010, the Anti-Trafficking Monitoring Group published a report 'Wrong kind of victim? One year on: an analysis of UK measures to protect trafficked persons'. The [report](#) identified problems in the National Referral Mechanism (NRM) finding the system to be relying excessively on the discretion of officials with "minimum training to staff a mechanism supported by flawed legal guidance relating to who should be identified as victims of trafficking". UK citizens referred were speedily identified as having been trafficked (76% of cases being positively identified as trafficked victims). However only 29.2 % of nationals from other EU states were positively identified as trafficked victims, and 11.9% of those from outside the EU. Whilst the report stated that the different rates of positive identification should not be taken as evidence per se of discrimination against people originating from outside of the EU, hat the startling difference in identification figures warranted examination by the Home Office.²⁷

2.3 The UK was recently appointed to the UN Human Rights Council, and internationally, through the work of Foreign Secretary William Hague, International Development Secretary Justine Greening, and International Violence Against Women Champion Lynne Featherstone, has been a strong advocate, on some issues related to VAWG.

2.4 In fact, much attention is given to the UK's work on tackling violence against women overseas. In evidence to the Parliamentary Liaison Committee inquiring about violence against women and girls, Prime Minister David Cameron stated:

2.5 "I think there is a huge opportunity this year for Britain to lead the charge on women's equality, on women's empowerment and on the empowerment of girls and women worldwide because we have so many things coming together. We have William Hague's excellent work on preventing sexual violence in conflict, and the fact that I co-chaired the High Level Panel, which gave women's empowerment and equality such a high profile. We have what the Development Secretary is doing on female genital mutilation and the fact that we are carrying forward an enormous commitment on helping on family planning."

2.6 In specific reference to Foreign Secretary William Hague's preventing sexual violence in conflict initiative: "It is full credit to the Foreign Secretary that he has decided to use Britain's diplomatic, military, Foreign Office, aid budget, everything, to

²⁷ The Anti-Trafficking Monitoring Group: 'Wrong kind of victim? One year on: an analysis of UK measures to protect trafficked persons'. June 2010

corral all of this together, to raise the profile of the issue.... We are trying to marshal everything we have got to deliver that vital agenda.”²⁸

- 2.7 In response to a question that if women’s organisations could provide him with evidence of how severely the funding changes have affected them and whether he would consider re-introducing ring-fenced funding for VAWG women’s organisations, Prime Minister Cameron’s response was:
- 2.8 “I will always look at the arguments. That is the best thing I can say to that. We have had to make very difficult funding decisions that have affected the police and local authorities. We have protected the health service, relatively. We have had to make difficult decisions and tried to accompany that with sensitive and careful understanding of potential problems. We might come on to domestic violence, so with the changes to legal aid, we have tried to make sure that the definition of domestic violence is as broad as possible, so that we provide some protection there. If women’s organisations have particular arguments and points, we are very happy to look at them.”²⁹
- 2.9 In November 2013, International Development Secretary Justine Greening hosted a high profile donor conference ‘A Call to Action on Violence Against Women and Girls’ intended to galvanise funding commitments from international donors, and where the Department for International Development announced £21.6 million in new funding to help protect girls and women in emergencies. In June of this year, Foreign Secretary William Hague is hosting a high level summit on sexual violence in conflict as part of his Preventing Sexual Violence Initiative, which again, aims to galvanise international support.
- 2.10 There is an evident disconnect in approach between the U.K.’s response to VAWG internationally and its domestic response, and to the protection and support afforded migrant and refugee women in the UK, including women fleeing the very same violence overseas. Whilst ERAW very much welcomes investment to prevent and respond to VAWG wherever it occurs, ERAW would encourage the same championing, creativity and strong messaging from leaders like Prime Minister Cameron, on tackling VAWG in the UK. The same level of commitment and leadership must be applied.
- 2.11 Domestically, there is also a struggle to promote a broader human rights agenda. Rather than standing up for the principles enshrined in the European Convention on Human Rights, the Westminster Government has signalled that they may consider withdrawing from the Convention.³⁰ Whilst this has not been a proposal of any sort it indicates an environment that is hostile to the notion of human rights. The Human Rights Act is regularly criticised, undermined and even attacked by certain parts of the media, with human rights narratives being distorted with ideas of protecting

²⁸ <http://data.parliament.uk/writtenevidence/WrittenEvidence.svc/EvidenceHtml/5219>

²⁹ Ibid

³⁰ <http://www.telegraph.co.uk/news/politics/conservative/10342403/Britain-may-need-to-withdraw-from-European-Convention-on-Human-Rights-says-Cameron.html>

'terrorists' and 'offenders' rather than 'ordinary citizens'. Politicians including Prime Minister Cameron have made reference to scrapping the Act, bringing into question commitment to human rights principles across the board.³¹

- 2.12 Legal developments have brought in new equality laws, and the Public Sector Equality Duty, but feedback from ERAW members indicates that these duties are not understood properly at local level, and in fact these misunderstandings and lack of knowledge around the requirements of the equality duty, is leading local decision-makers to favour gender neutral service provision, or to place pressure on women-only or women-centric services, to provide services to men as well, regardless of whether there is demand, or concerns about safety in mixed sex services.
- 2.13 ERAW regrets the weakening of the specific duties in England which are likely to mean that public bodies are less able to comply with their obligations under the general duty, for example in relation to ensuring that survivors have access to specialist support. We believe that these losses might not have happened had the Government adopted an over-arching gender equality strategy.
- 2.14 The UK has signed and ratified relevant international human rights standards, including the UN Convention on the Elimination of all forms of Discrimination Against Women, and whilst the UK has signed the new European Convention on Violence Against Women and Domestic Violence (the Istanbul Convention), is yet to ratify this treaty, though it is expected to do so soon.
- 2.15 ERAW welcomes the opportunity of the visit of the UN Special Rapporteur on Violence Against Women and Girls, its Causes and Consequences. This provides an important moment to establish current information and data on VAWG in the UK, including assessing both good practice, and to put forward recommendations for measures where further government action could make a difference towards the elimination of VAWG.

³¹ <http://www.theguardian.com/law/2013/aug/08/david-cameron-human-rights-act>

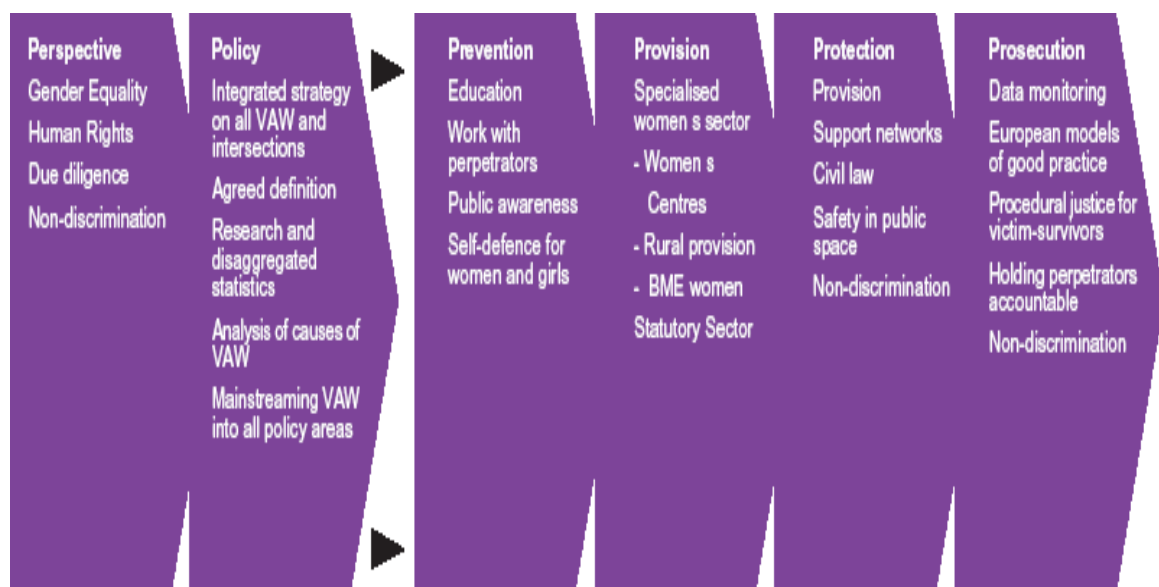
3. EVAW’s framework for an integrated approach to ending violence against women and girls

3.1 Informed through in-depth consultation with EVAW’s members, and building on decades of experience of advocacy within the UK context, EVAW produced a template for developing an integrated strategy on violence against women for the UK (*Realising Rights, Fulfilling Obligations: A Template for an Integrated Strategy on VAWG for the UK*).³² In this publication EVAW illustrated and explained the development of a template that focuses work around six Ps: Perspective, Policy, Prevention, Provision, Protection, and Prosecution.

3.2 Whilst acknowledging that, globally, approaches to violence against women follow a prevention, protection and prosecution model, EVAW’s experience suggests that it is critical that a Government’s work to fulfil their international human rights obligations to end violence against women begins with the perspective from which issues are framed, that different government policy frameworks inter-relate on VAWG yet are often developed in siloes, and so an understanding of the different policy contexts is crucial, and that there are specific barriers and challenges to the provision of services that are distinct from protection measures, requiring specific planning and implementation.

3.3 EVAW advocates that focusing attention on these six principles can lead to a more holistic and integrated approach that, implemented with due diligence and in partnership with experts within the women’s rights and VAWG sectors, not only has the potential to improve the human rights outcomes for women and girls, but can create a transformative environment within which Government’s can frame their prevention and response to VAWG.

3.4



³² http://www.endviolenceagainstwomen.org.uk/data/files/resources/38/realising_rights-jul-08.pdf

The following sections assess the Westminster Government's approach to ending VAWG against their international obligations and the standard of due diligence, and using the principles of the six Ps as a framework. EVAW also takes as a frame of reference the work of the office of the UNSRVAW in developing understanding on best practice implementation of international obligations relating to ending VAWG, in particular, the emphasis on a holistic approach which recognises that human rights are universal, interdependent, and indivisible; understanding that VAW is a continuum that spans interpersonal and structural violence, and acknowledging the structural aspects of discrimination.

3.5 It is important to note that whilst the UK Government in Westminster is signatory to international human rights and humanitarian law, there are responsibilities within UK law that are devolved to national level governments in Wales, Scotland and Northern Ireland, and to local authorities. Aspects of these devolved policies are key to VAWG, therefore reflecting a joint responsibility across all aspects of government throughout the UK to prevent and respond to VAWG. This briefing endeavours to reflect the devolved aspects of VAWG policies where possible, and recommends the UN Special Rapporteur consider the situation facing women and girls throughout all nations and regions of the UK.

4 Perspective

4.1 A perspective on VAWG covers both the definition and the principles on which policy and practice should be based forming the foundations from which all other activities flow. Without a coherent perspective, interventions are frequently reactive, to either the availability of funds or to the impact of high profile cases. Differences in perspective are evident across government departments; this lack of a shared perspective continues to undermine the potential for a more strategic, holistic 'whole of government' approach to preventing and responding to VAWG.

4.2 Important principles that should underpin approaches to VAWG include, recognition and linking of gender equality policies and measures as integral to preventing and responding to VAWG, clearly defining VAWG as a violation of women's human rights in line with UN definitions, and the very existence of VAWG is a barrier to women enjoying their full range of human rights. The principle of non discrimination should also apply, and States should act in line with their due diligence obligations, that is with care, effort and effectiveness using all means available, to bring about change.

Scope of Westminster strategy *Call to End VAWG*

4.3 It is widely welcomed and recognised across the women's sector that the Westminster Coalition Government has maintained its commitment to the VAWG strategy and

regularly publishes VAWG Action Plans, which are based on consultation with experts in the sector.

4.4 Following years of campaigning by EVAW members, the previous Labour Government published Westminster's first VAWG strategy in November 2009, signalling recognition of the need to take more strategic and integrated approaches to addressing and preventing all forms of VAWG. There is still currently political consensus about the need for such an approach, with the Coalition Government having published its own strategy *A Call to End VAWG* in 2010. However we note the tendency to move away from the language of VAWG, as required by CEDAW and other international instruments, with governments and political parties preferring the de-gendered domestic and sexual violence.

4.5 EVAW is concerned however that the joined up approach is jeopardised by the move of funding to the local level and the lack of high profile consensus on the continuing need for a comprehensive and planned VAWG strategy across the UK.

4.6 However, there are significant gaps in the strategy and it is not fully compliant with existing or new and significant international obligations such as the 2011 Council of Europe Istanbul Convention³³ and the 2011 EU Directive on Victims' Rights.³⁴

- There is an on-going conflation by public bodies of domestic violence with VAWG.
- The new cross-government definition of domestic violence conflates it with family violence, failing to recognise the gendered nature of intimate partner violence and marginalising FGM, forced marriage and honour based violence, which appear after an asterisk.
- Gender-neutral policies are ineffective as evidenced by successive domestic homicide reviews and reports by the IPCC.
- Localism is reinforcing geographic inequalities in access to support.
- An interpretation of commissioning and open tendering has enabled large-scale providers with no track record, including G4S, to take over community based services, which is having a devastating impact on the specialist sector. This is being exacerbated by shifts in funding streams to PCCs and to health commissioners.
- Austerity measures are having serious impacts on women's services³⁵, which are specified as essential provision in the Istanbul Convention.
- Trafficking and prostitution are excluded.
- There is no long-term prevention strategy.

4.7 However, important issues such as pornography and sexualisation are recognised, and establishment of the Rape Support Fund, which has seen the stabilisation and extension of Rape Crisis Centres, has demonstrated that national funding streams are possible. A soon to be implemented EU Directive on procurement will provide an even stronger basis for securing funding to small but essential local services using non-marketised funding streams.

³³ http://www.coe.int/t/dghl/standardsetting/convention-violence/default_en.asp

³⁴ http://ec.europa.eu/justice/policies/criminal/victims/docs/com_2011_275_en.pdf

³⁵ See, for example, *Layers of Inequality: A Human Rights and Equality Impact Assessment of the Public Spending Cuts on Women in Coventry* (July 2013)

<http://www2.warwick.ac.uk/fac/soc/law/chrp/projects/humanrightsimpactassessments/women/>

4.8 ERAW very much welcomed A *Call to End VAWG* and the commitment to a different approach. ERAW has enjoyed the opportunities to input into the strategy and corresponding VAWG Action Plans, which provide the central framework for Westminster policy, including prevention as a key pillar of government action, representing a turning point in government perspective on VAWG.

4.9 VAWG strategies should also include programmes to work with perpetrators, as a central part of commitments towards prevention, for example very little work has been done on masculinity with sex offenders. A holistic approach in addressing issues around accountability is very much needed, and interventions for perpetrators should abide by national standards for example, the Accreditation on Safe Minimum Practice Standards and Respect Accreditation Standards developed by RESPECT.³⁶

Inconsistent perspective on VAWG across government departments

4.10 The *Call to end VAWG* is led by the Home Office and provides the framework to identify priorities, develop actions and evaluate achievements. However, whilst this is a positive approach, it is only effective if it translates into fully resourced and supported action consistently applied across government.

4.11 The *Call to end VAWG* does not enjoy consistent levels of support and ownership across the different government departments. Some are far less engaged on VAWG and the Department for Education, the Department for Media, Culture and Sport, and the Ministry of Defence have far more work to do in delivering on the strategy.

4.12 There are also differences in the approach to international VAWG work. The *Call to end VAWG* includes international objectives, and so is the natural umbrella within which to situate all work. International initiatives have been developed and these are welcome, demonstrating important leadership globally. However, they have progressed outside the framework of the *Call to End VAWG*, with very little cross-linkage, resulting in a lack of consistency in policy and approach, and little opportunity for knowledge transfer. Most importantly, we have failed to apply domestically some of the excellent principles that we promote internationally such as investment in effective models for prevention and encouraging and supporting the work of women's rights organisations.

4.13 Under Foreign Secretary William Hague the UK has led new international legal developments under his Preventing Sexual Violence Initiative, including the G8 Declaration on SV in Conflict, April 2013, and the UNSC Declaration of Commitment to End SV in Conflict, Sept 2013. The Department for International Development has also produced a framework within which overseas projects should advance work on VAWG including the *Theory of Change*.

³⁶ <http://www.respect.uk.net/pages/accreditation-project.html>

4.14 These are welcome initiatives, but illustrate a lack of a coordinated approach across government departments. Learning and innovation that is taken forward internationally is not applied domestically, with a tendency to treat VAWG overseas as separate and distinct from VAWG domestically.

Lack of knowledge and understanding of VAWG at all levels of State infrastructure

4.15 Sufficient knowledge, understanding and awareness of VAWG, its causes and consequences, proves to be a critical issue whether assessing action at local, regional or national level, whether applied to domestic VAWG issues or international VAWG issues. To determine effective policy and action on VAWG requires a good understanding and level of knowledge amongst policy makers and decision makers. ERAW members experience is that knowledge is inconsistent at local, regional and national levels.

4.16 Knowledge of VAWG as a gendered human rights issue: ERAW has pushed for the UK to adopt the UN definition of VAWG, which clearly states VAWG as a fundamental violation of women's human rights, which brings clear obligations on the part of States to respect, protect and fulfil women's rights to be free from violence. Whilst the Call to End VAWG references the definition in the UN Declaration on Violence Against Women, the extent to which VAWG is recognised as a human rights issue is not clear, especially at local levels where an un-gendered approach is often taken, especially with respect to intimate partner violence.

4.17 Questions are raised by policy-makers, concerned that a gendered approach excludes measures for male victims. However, the need for a gendered approach on VAWG is clear in that the vast majority of these crimes are perpetrated by men and boys against women and girls. Whilst we recognise that some men also experience rape, domestic violence and forced marriage – these are still gendered in that the majority of perpetrators are male. A VAWG perspective provides the overall framework for effective policy-making but does not in any way prevent implementation in relation to male victims.

4.18 Knowledge of gender equality responsibilities: Whilst there are clear obligations towards gender equality in the Public Sector Equality Duty, ERAW members report that local authorities and other public bodies misunderstand their legal obligations and are increasingly applying a gender-neutral approach to policies around VAWG, which is having a particularly detrimental impact on the commissioning of services to address VAWG.

4.19 Knowledge of appropriate and effective responses on VAWG: Linked to the issue of responsibilities towards gender equality, there is insufficient knowledge and awareness on what is used by women and girls and meets their multiple and complex needs, particularly in supporting victims and survivors, and therefore what responsibilities local authorities have in ensuring sustainable funding for a holistic range of services.

4.20 International human rights standards are clear on State obligations for the provision of services for victims and survivors of VAWG, for example The European Directive on establishing minimum standards for support and protection of victims carries clear obligations on States to provide appropriate services including targeted and integrated support for victims with specific needs. Yet the delegation of decisions and the opening up of competitive tendering processes for services at local level, together with insufficient knowledge and support for the role of specialist women only VAWG services, are undermining funding calls from organisations. This is especially the case for small community based organisations, many of whom apply a gendered approach to VAWG, and understand the importance of providing specialist, long term, women only spaces to meet the needs of women and girls, including those from minority communities, who need protection and support.

4.21 At national level, there is still the perspective that the most effective response to VAWG is a traditional criminal justice response. This is also evident in the work of the Foreign and Commonwealth Office's Preventing Sexual Violence in Conflict Initiative, which focuses on impunity. It is also evident in measures to address FGM, where there is concern that since the FGM Act came into force in 2005, there have been no successful prosecutions.

4.22 There is concern that this approach will also be dominant once the Forced Marriage legislation is implemented, whereas a package of State responses are needed including measures for education, public awareness, specialist support for victims and for those at risk, programmes to challenge attitudes that underpin VAWG, and ensure that the human rights of victims and survivors are central. The tendency to focus first on a criminal justice approach rather than beginning from the needs of women girls for spaces in which they name violence and deal with its many legacies, permeates across government departments, weakening the focus and delivery of non-CJS departments. This is not to detract from the achievements of the criminal justice system, and in particular the Crown Prosecution Service, which was one of the first arms of government to develop its own violence against women strategy, working effectively with experts from the women's sector and with academics, and which has led the way in improved training for lawyers and judges, restructuring teams to improve responses, setting clear targets and monitoring against their delivery.³⁷

4.23 Understanding of the standard of due diligence: The standard of due diligence in implementation of international human rights commitments is a key tool with which to hold governments accountable for their policies and their actions. It is also a tool within which the opinion of State institutions and civil society can differ, in assessing whether a State has acted with sufficient effort and political will to be considered as fulfilling their human rights obligations.

4.24 Extensive guidance already exists on the measures that States should take in order to respect, protect, fulfil and promote the human rights of women subjected to all forms of violence, found in the 1993 Declaration on the Elimination of all forms of VAW, General Recommendation 19 of the UN CEDAW, the UN Beijing Platform for Action,

³⁷ www.cps.gov.uk/legal/d_to_g/domestic_violence_aide-memoire/

recommendations on VAW by the Council of Europe, the Istanbul Convention, and various reports of the UN Special Rapporteur on Violence Against Women, its Causes and Consequences.

- 4.25** ERAW would welcome a due diligence approach being applied to implementation of the *Call to End VAWG*, and the VAWG Action Plans, in particular in reference to guidance addressing: planning and resources for national level strategies and action plans; the importance of strategic approaches to prevention; recommendations for civil and criminal protection and remedies; provision of emergency and long term support and rehabilitation for women and their dependants.

5 Policy

5.1 Implementation of the *Call to End VAWG* and the VAWG Action Plans should be a priority policy area for all UK governments, administrations and local authorities. This should include measures to monitor and evaluate progress against targets. A consistent approach that clearly links gender inequality as a cause and consequence of VAWG should be integrated across all policy areas that have an impact on VAWG, with a clear commitment to improving outcomes for women and girls. This is especially important where there are tensions across different government policy areas, and where VAWG commitments are treated as a lower priority to other policy commitments.

5.2 The Crown Prosecution Service (CPS) has a strong policy approach to VAWG, having worked closely with academics, experts and women's organisations to develop their VAWG strategy. More recently, responses by successive Director's of Public Prosecutions (DPP) on VAWG issues have been very positive and shown strong leadership. As DPP, Keir Starmer made VAWG a priority for the CPS under his tenure, leading significant change in the CPS' approach to prosecuting VAWG cases. More recently, the current DPP Alison Saunders has publically defended the decision to prosecute historic sex cases, despite the recent acquittals of celebrities such as Dave Lee Travis and Bill Roache.³⁸ However, effective policy approaches to VAWG demonstrated by the CPS, are not consistent across government.

5.3 There are also promising examples of local and regional strategies that complement the national strategic approach. Good examples of local level strategies include the pan-London [strategy](#) on VAWG, the [Safer Lambeth](#) VAWG strategy, and Bristol which is about to launch a city wide standard on teaching VAWG in schools. Bradford and Brighton also have local VAWG strategies.

Impact of economic austerity policies

5.4 The Westminster Government has introduced a number of changes under the banner of 'economic austerity'. These policy measures have serious consequences both for the

³⁸ http://www.cps.gov.uk/publications/docs/cps_vawg_report_2013.pdf

specialist organisations providing services on VAWG, and on women who need to access a range of support because of the violence they have experienced.

5.5 Consequences of cuts to national budgets: Cuts to national level budgets are in turn leading to reductions in the provision of local services and the loss of specialised expertise, despite the introduction of some new national funding streams for example the Ministry of Justice Rape Support Fund. We would welcome a cross party agreement to continue this fund after the next election; if that is not the case almost half of rape crisis centres face closure of some or all of their services.

5.6 Research indicates that the VAWG sector has lost 31% of funding from 2010/2011 to 2011/2012.³⁹ This is a substantial reduction in a relatively short space of time drastically affecting the provision of gender-specific specialist services (recognised as the most appropriate and effective in supporting victims and survivors) and affecting the women they support. This was a reduction of £2.4 million (from £7.8 million to £5.4 million). Whilst budget cuts have impacted across a range of services at local level, specialist VAWG services play a key role for the State in protecting women's right to life, and to be free from cruel, inhuman and degrading treatment. The protection of and investment in such services should be a high priority. Even within the context of economic austerity, the impact on specialist VAWG services are disproportionate, yet it is within the financial capabilities of the State to ensure specialist services that work for women, are maintained.

5.7 The localism agenda and changes to commissioning processes: Local funding is now discretionary under the rubric of Localism, a government initiative designed to achieve a '*substantial and lasting shift in power away from central government and towards local people*'.⁴¹ Some of these changes were included in the Localism Act 2011, which among other things increased the powers of local government. The philosophy of localism militates against the strategic national planning of service provision, leading to delegating responsibility to the local level, removing central coordination, scrutiny and accountability.

5.8 The resulting partial, uncertain and discretionary funding of services by the state leads directly to gaps in services, in breach of the duty of due diligence, and in breach of the EU Directive on Victims' Services.⁴⁰

5.9 The new policy of localism means that local commissioning of services is in a state of flux and chaos. Many organisations providing specialist women-only and women-centred services, are reporting changes in commissioning that are reducing the amount of funding, creating increased competition for funds and risking reduction or closure of services. A trend towards fragmented commissioning frameworks that favour generic large providers offering lower unit costs, but lack expertise on VAWG has intensified under the Westminster Government's localism agenda.

5.10 Specific threats to services for BME women: EAW member organisations report that funding cuts have disproportionately affected BME women's organisations. One BME women's organisation reports that in the last 3 years focusing solely in two London boroughs, they have been excluded from 6 tender opportunities valued at approximately £250,000. The basis of this exclusion has been their focus on gender and black women's specialism.

³⁹ Walby, S "Measuring the impact of cuts in public expenditure on the provision of services to prevent violence against women and girls: <http://www.trustforlondon.org.uk/wp-content/uploads/2012/01/SummaryVAWG.pdf>

⁴⁰ DIRECTIVE 2012/29/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime

- 5.11 Where gender specific services have been included in tendering, black women's specialist focus has been excluded. Where the Council has recognised black women's services, funding to these services have been cut by as much as 50% to 65% representing a cut of approximately £200,000 per annum.
- 5.12 Total actual and potential income loss taking these figures into account for this particular organisation has been approximately £450,000 per annum. This is an example of the threats to the long-term sustainability and survival of black women's organisations and it is the prevailing pattern of tendering and commissioning.
- 5.13 **The impact of changes in Legal Aid:** Changes in policy have also brought funding cuts to legal aid and, together with stringent evidence criteria for proving domestic violence, are restricting women's access to justice. The changes came into effect in April 2013 through the Legal Aid Sentencing and Punishment of Offender Act 2012. Accompanying the Act, the Civil Legal Aid (procedure) Regulations 2012 introduced criteria whereby legal aid for private family matters could still be available for those affected by domestic violence if survivors could provide evidence that they had experienced domestic violence.
- 5.14 Concerns were raised consistently in the lead up to the adoption of the Act that the prescribed and exhaustive list of evidence criteria would mean that many women who had experienced or continued to experience domestic violence would not be able to satisfy the regulations and therefore qualify for legal aid.
- 5.15 Research carried out by Rights of Women and Welsh Women's Aid '[Evidencing domestic violence: the facts](#)' published during the passage of the Act through Parliament demonstrated that 54.4% of women accessing Welsh Women's Aids services as survivors of domestic violence would not meet the evidence criteria. 60% of respondents to the research survey took no action in relation to their family law problem as a result of not being able to apply for legal aid. 23% paid a solicitor privately and 15% represented themselves in court, forcing direct contact with their abuser.
- 5.16 One respondent to the survey stated: "I now cannot fight for my children to get them away from their abusive father or for my financial settlement after our divorce, which in turn has left me in a dire financial state and I am thinking more and more of taking my own life, please help us."
- 5.17 Another responded "I have been told I have to pay £700 to get legal aid but they have not assessed my bank statements correctly as they say I have a lot more money than I have. I am a single mum on benefits, I don't receive maintenance and when I got the letter saying I had to find £700 I just wanted to die. It means I will now have to face my very high risk stalker (I've been to MARAC⁴¹ 3 times and am now being referred to the stalking clinic as he is still stalking me) in court on my own without legal representation because I do not have the money legal aid are asking for."
- 5.18 Having the required evidence seems to be the main barrier to women being able to meet the requirements for legal aid. This renders them vulnerable to continued violence and abuse, and creates real barriers to their ability to protect themselves and their children from their abuser. There is also concern that the removal of the majority of private family law from the scope of legal aid will result in fewer firms offering family law legal aid, increasing the difficulty for women to access legal advice and legal services.

⁴¹ Multi Agency Risk Assessment Conferences that deal with VAWG cases.

Unprotected groups

5.19 Despite efforts to convince the Westminster Government to take a holistic approach to VAWG, particular vulnerable groups of women are consistently left outside the VAWG framework, as a result of other government policy areas taking priority over commitments to protect and support all women and girls. These gaps and inconsistency in policies is particularly felt with regard to migrant women, women seeking asylum, refugee women and women who are in the UK on visas. Immigration policies take precedence over VAWG policies, for example, the UK government has the powers to detain asylum seekers including women asylum seekers at any stage of the asylum process and for undetermined periods, many of whom will have experienced violence.⁴² Women are detained in immigration removal centres such as Yarl's Wood (run by SERCO) even when incarceration can exacerbate and re-traumatise victims of violence.

5.20 **The impact of the 'no recourse to public funds' policy:** Under Immigration Rules anyone who enters the UK on a visa is deemed to have no recourse to public funds, meaning they are excluded from any social welfare or other form of State benefit. However, many of the UK's VAWG related services such as emergency accommodation in women's refuges, and money for essential subsistence for those unable to work and without support, are funded through the social benefits system. Women in the UK on visas feel the impact of this policy because they are not eligible for the benefits necessary to access VAWG services if they are experiencing violence and are without means. Their choice is stark, leave a violent partner and risk destitution, or remain and suffer further abuse.

5.21 A campaign by a group of women's rights organisations in 2008, challenged the government for failing to fulfil its obligations to act with due diligence in protecting all women within the UK's jurisdiction. In response to the campaign, the Westminster Government put in place a specific fund (the Sojourner Fund) but restricted this to helping women in the UK on a spousal visa where there is evidence of domestic violence, and only for up to 40 days⁴³.

5.22 ERAW welcomed this development, but it stops short of providing real solutions for women, many of whom who are still effectively left unprotected. The Sojourner fund only applies to a very limited pool of those women affected by the no recourse to public funds rule, and the timescales for which funding is available is so short that the intention of the measure is undermined, and places additional pressure on already stretched VAWG services.

5.23 **Poor quality decision-making in women's asylum claims leaves them vulnerable to VAW in the UK.** The UK's standards for dealing with VAWG in relation to women seeking asylum compare poorly with those for women experiencing VAWG in the UK or abroad, demonstrating a lack of due diligence and joined up government.

5.24 In 2012, 6,071 women claimed asylum in their own right, out of a total of 21,785 asylum seekers. Roughly one third of women are granted asylum initially, one third on appeal and one third are refused at all stages. In 2012, one quarter of all women applying in their own right were from Pakistan and Iran, with other significant numbers coming from Nigeria, Eritrea, China, Sri Lanka and Somalia, countries where there are particular concerns about lack of state action to protect women from VAW.

⁴² For further information see Women for Refugee Women, 'Detained: women asylum seekers locked up in the UK' February 2014.

⁴³ See Southall Black Sisters www.southallblacksisters.org.uk/campaigns/abolish-no-recourse-to-public-funds/

5.25 Once in the UK, women face multiple layers of discrimination, for being a woman, and an asylum seeker. She is also more likely than a man to get the wrong initial asylum decision. If a woman's asylum claim and subsequent appeals are refused, accommodation and support is withdrawn unless she has children or exceptional circumstances. This is likely to leave her destitute and at risk of VAW in the UK.

5.26 In 2011 by Asylum Aid demonstrated the poor quality of initial decision-making on asylum cases, and showed that cases were overturned on appeal because of poor credibility assessments.⁴⁴ In undertaking credibility assessments, decision-makers appeared not to be using the lower standard of proof, which is reasonable likelihood of persecution on return. Many women are persecuted in the private sphere in their country of origin and so do not have documentary evidence of this harm and might be at risk if they had asked for state protection. In addition, it may be difficult for them to provide coherent, consistent, chronological narratives due to the trauma they have experienced.

5.27 Evidence shows that destitute women experience sexual violence and exploitation and engage in transactional activity including sexual activity in order to get a roof over their head. In an in depth study of women seeking asylum, Women for Refugee Women found that of those refused asylum, 67% had been made destitute and of those who were made destitute 16% had experienced sexual violence whilst destitute.

Saron's story (extract)⁴⁵

"I came because I had to. I would never have chosen to leave my family, everything I love about my country, the sunshine, the music, the food that tastes good in your mouth.

When they refused me asylum the money stopped and I didn't have a place to live. The girl I met in the hostel let me sleep on her floor for a while, but then she was sent out of London and I didn't know anyone else. Where did I sleep? Rough. I think I went mad. I got confused. I was crying all the time. I had no legal paper to work or stay in the country. I was destitute.

I was completely without friends. If you sleep rough, as a woman, men abuse you. They offer you a safe place, a warm place, but then it is like what the policeman did to me in prison."

5.28 Whilst international human rights law allows for States to differentiate between citizens and non-citizens in some policy areas, this has been narrowly defined as appropriate only when necessary and proportionate to a legitimate aim (footnote source cited in no recourse), which may include maintaining systems to control immigration. However, differentiating between citizens and non-citizens should not apply to the enjoyment of rights as a whole and cannot apply to non-derogable rights such as the right to life, or the right to be free from torture, or cruel, inhuman and degrading treatment. In fact, the particular rights of immigrant women to equal assistance in cases of violence, has been clearly recognised.⁴⁶ The EU Directive on establishing minimum standards for support and protection of victims is also clear regarding access to services for all women.

⁴⁴ Asylum Aid 'Unsustainable: the quality of initial decision-making in women's asylum claims', 2011

⁴⁵ Dorling, K. et al, 2012. *Refused: the experiences of women denied asylum in the UK*, Women for Refugee Women, page 30

⁴⁶ Amnesty International UK and Southall Black Sisters 'No Recourse, No Safety: The Government's Failure to Protect Women from Violence, 2008

Policies towards women offenders

- 5.29 The UK has some good policies on paper for adult women in the criminal justice system (England and Wales), however such policies are not being consistently applied across the criminal justice system, and are not being delivered in practice. Furthermore, young women exhibiting problematic behaviour face particular vulnerability, and there is a lack of specialist policy responses and facilities for young women.
- 5.30 In 2007, Baroness Corston published a report reviewing women with particular vulnerabilities in the criminal justice system ([The Corston Report](#), England and Wales, Home Office). In the report, Baroness Corston identified women at risk of three types of vulnerabilities, including domestic violence, which can lead to a crisis point that ultimately results in prison. The Corston Report made a series of recommendations, which were accepted by the Westminster Government, but not all have been fully implemented.
- 5.31 Women specific prison policy is governed in *Prison Service Order 4800 – Women Prisoners; Prison Service Instruction 54/2011 – Mother and Baby Units and Prison Service Instruction 67/2011 – Searching the Person*. Specialist domestic violence organisation Women’s Aid worked with the National Offender Management Service (NOMS) to develop a framework for probation and prison staff: Supporting women offenders who have experienced domestic violence, and some data on prevalence is gathered through Women’s Custodial Estate Reviews.
- 5.32 **Lack of implementation of policies:** Whilst there is policy on responding to women’s experiences of VAWG whilst they are in the criminal justice system as offenders, there is an unacceptable gap between policy and practice. The policies have not resulted in adequate levels of support, nor the culture shift required to avoid or to mitigate the re-traumatising impact of the criminal justice system on women.
- 5.33 Programmes of support are not available routinely in every facility, for example there are no programmes at present in HMPs: Styal, Askham Grange, or Foston Hall, though programmes are available in HMPs Low Newton, New Hall and Drake Hall, and Bronzefield, and services for women on release are patchy.
- 5.34 **Unmet needs:** Evidence shows that there is a high correlation between women who are in the prison system and experiences of violence, exploitation and abuse, including abuse in childhood. In the 2013 Women’s Custodial Estate Review 53% of women in prison reported having experienced emotional, physical or sexual abuse as a child.⁴⁷
- 5.35 In 2012, 79% of those using the services of the specialist organisation Women in Prison had experienced or were experiencing domestic or sexual violence, 22% had experience of sex working. However, because of their offending history, they experience barriers to accessing mainstream VAWG services, because women in this position find it difficult to access services, or services lack an understanding of the criminal justice

⁴⁷ This is likely to be an under representation as the questions for this review were asked at reception on arrival in prison, not all will report at this stage. 80% of Women in Prison’s service users report having experienced domestic or sexual violence.

system from the perspective of an offender. Women in prison facilities, or with offending records, often have complex problems that increase their vulnerability to VAWG, yet there are few services available to support them.

6. Prevention

- 6.1 “Violence against women is not something which needs to be inoculated against, but rather is embedded in longstanding attitudes, practices and relational structures. Interventions will only contribute to the elimination of violence if they are part of planned, coherent and co-ordinated prevention programmes.” (Yakin Erturk, 2008).
- 6.2 The UK has various international obligations to prevent VAWG before it happens and to change attitudes, cultures and stereotypes that perpetuate gender inequality, including under the European Convention on Human Rights, the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), the Convention on the Rights of the Child and most recently the Council of Europe Convention on Combating and Preventing Violence Against Women and Domestic Violence (which the UK has signed but not yet ratified).
- 6.3 In 2010 the UN Human Rights Council, of which the UK is now a member, adopted a resolution entitled, ‘Accelerating efforts to eliminate all forms of violence against women: ensuring due diligence in prevention’ which urges governments to adopt a series of comprehensive measures aimed at preventing violence against women.
- 6.4 The first principle goal of the Home Office *Call VAWG* is to “prevent such violence from happening by challenging the attitudes and behaviours which foster it and intervening early where possible to prevent it”.

Lack of a dedicated programme of work on prevention

- 6.5 The UK demonstrates understanding of the importance of prevention, identified as a key pillar in the *Call to End VAWG*. In the foreword, Home Secretary Theresa May states: “at the heart of our approach will be prevention. We will work across the whole of government on preventative measures to stop violence from happening in the first place.”⁴⁸
- 6.6 EVAW is concerned this commitment has not yet translated to a considered, resourced and long term prevention strategy. The Department for Education, key to taking forward prevention measures, has yet to deliver on its role in preventing VAWG, including ensuring schools promote gender equality and challenge harmful attitudes and behaviours in children, especially boys.
- 6.7 Good initiatives have been instigated, such as the Home Office’s teen abuse campaign [ThisisAbuse](#). This is a beacon of excellence, developed with specialists in the VAWG sector, EVAW welcomed the recent development of this campaign and would like it to be further expanded or built upon. However, prevention remains the weakest part of UK responses to VAWG. Prevention work is minimal, under-resourced, and not strategic. Work on bullying in schools is de-gendered and the expansion of faith schools is likely to mean that students are denied vital education on sex, sexuality and relationships and may mean that girls are less likely to report

⁴⁸Call to End Violence Against Women and Girls, Home Office 2010

violence to their schools and be supported by them. .

6.8 Prevention measures must also reflect international obligations to advance gender equality, and to challenge cultural and traditional stereotypes that are discriminatory, and that tolerate, justify or condone VAWG, EAW considers that the current approach to prevention of VAWG falls far short of the requirements in Article 14 of the Istanbul Convention.

6.9 In 2013, EAW, with expertise from member organisations carried out a review of Westminster Government action on prevention. The subsequent report 'Deeds or Words?' concluded that "the Westminster Government has the building blocks in place to be a global leader on women's safety' having led the way on policies and laws to VAWG. The report urged the Westminster Government to be "aspirational in it's goals for a safer and more equal society and to "build on the foundations it has put in place and develop a long-term, resourced programme of work on preventing VAWG".⁴⁹

Education

6.10 There is a critical need for education on VAWG related issues especially amongst young people. The Children's Commissioner's Inquiry into Child Sexual Exploitation in Gangs and Groups found that despite increased awareness, children are still slipping through the net.

6.11 Between August 2010 and October 2011, a total of 2409 children were known to be victims of child sexual exploitation, with 16,500 children and young people at risk. Whilst serious gaps remain in the knowledge, practice and services required to tackle child sexual exploitation, this also illustrates part of the continuum in which VAWG takes place, and a pattern of violence that disproportionately affects girls.

6.12 During the Inquiry, the use of, and children's access to pornography emerged as a key theme, with concerns that teenagers and younger children are accessing pornography including extreme and violent images, and of links between violent attitudes and violent media.⁵⁰

6.13 There is currently no legal obligation on schools to teach about VAWG in any part of the curriculum, yet good practice examples do exist:

Bristol - a city-wide action plan for addressing all forms of VAWG: Bristol is one of the few cities to maintain levels of funding for VAWG services in the face of the current cuts to local authority budgets, recognising that savings made on paper to already under-resourced but vital services can only lead with immediate effect to increased financial and social cost.

Bristol's strategic partners are developing a local programme, "The Bristol Ideal", which sets an expectation for all schools and early years settings in Bristol to educate staff and young people about safe, healthy and equal relationships as well as providing the information and resources to enable schools to meet the standard. Pilots have already shown excellent results, and research and monitoring is on-going, providing a compelling evidence base.

All schools and early years settings who meet the standard will be celebrated and

⁴⁹ http://www.endviolenceagainstwomen.org.uk/data/files/Deeds_or_Words_Report.pdf

⁵⁰ Children's Commissioner's Inquiry into Child Sexual Exploitation in Gangs and Groups "Basically...Porn is Everywhere – A Rapid Evidence Assessment on the Effect That Pornography Has on Children and Young People", May 2013

recognised. It is hoped that the elements of the Bristol Ideal will be replaced in time by a national standard that ensures the basic right of all young people, wherever they live in the country, to know how to be safe and to flourish in their enjoyment of healthy, equal and respectful relationships.

Public campaigns

- 6.1 There has been little investment so far in research, monitoring or evaluation of prevention interventions and EAW believes the Home Office should lead in establishing a cross-government research programme to commission, collate, evaluate and disseminate research on good practice in prevention. Initiatives like *ThisisAbuse* could have more transformative potential if conceptualized and delivered as part of a broader sustained strategy, with targets, monitoring and evaluation to determine impact. The Home Office has committed to carry out a mapping exercise of prevention interventions in England. This could, include those funded by schools, police forces, local authorities and other public bodies, as well as initiatives in the women's sector.
- 6.2 The Home Office should carry out regular comprehensive surveys on attitudes towards all forms of VAWG, similar to the annual THINK! attitudes to road safety survey, and develop public campaigns based on the results. We note that there is very little evidence of prevalence of certain forms of VAWG including sexual harassment, female genital mutilation and forced marriage and would urge the Government to invest in research here.

Community mobilization

- 6.3 Friends and families are often the first place a survivor turns to for support, however, misconceptions about VAWG, or prejudicial attitudes can mean that survivors are reluctant to tell anyone, and those they do inform, may not know how to intervene or respond. Programmes aimed at community mobilization should also form part of prevention strategies, empowering the community to take a stand against violence. Together with leadership at grassroots level, community mobilization is particularly important for changing attitudes and behaviours.

GET SAVI (Students Against Violence Initiative) training programme is coordinated by Scottish Women's Aid in collaboration with LGBT Youth, Rape Crisis Scotland, White Ribbon Scotland and Zero Tolerance.

The programme aims to give silent bystanders the skills and confidence to stand up and speak out against all forms of gender based violence and abuse. It has been designed for students to use within their own college or university to challenge attitudes and empower bystanders so they can be part of a movement to end all forms of gender based violence.

The programme is made up of different resources, presentations and session notes so that it can be picked up and worked with by anyone who wishes to use it. Scottish Women's Aid, in collaboration with NUS Scotland, recently trained a group of students as Get Savi ambassadors, peer educators to deliver the course in their own campus settings.⁵¹

⁵¹ Cited in EAW 'Deeds or Words?' Analysis of Westminster Government Action to prevent VAWG, 2013

Sexualisation of women and girls and harmful media

6.4 There is growing evidence about the role that the sexualisation and objectification of women in the media plays in providing a conducive context in which VAWG flourishes. This includes social media, video games, music videos, advertisements, online pornography as well as traditional media.⁵² EVAW welcomes the commitment to address extreme pornography through the provision in the new justice Bill to criminalise the possession of 'rape porn' which is widely available on the internet at the click of a button, and action with internet companies to restrict access to child abuse images, and the introduction of filters. This is particularly concerning in light of research showing that children, especially boys, are increasingly accessing violent pornography online, having an impact on their attitudes towards women and girls.⁵³

6.5 Addressing the negative impact of this representation of women and girls in the media is a critical element of any strategy to prevent VAWG and is a necessary outcome of post-Leveson media reforms. For example, this should include a strengthened anti-discrimination clause in the Editors' Code of Practice, and allow expert women's groups to complain to the new regulator about discrimination against women in the press. The Government should address the lack of consistency across the media in the regulation of sexualised and objectified images of women, in order to ensure that images that would not be broadcast on television or would be subject to the watershed should be restricted in the same way in the print media.

7 Provision

7.1 The provision of specialist support services has long been established as a responsibility of States under international law. The European Directive on establishing minimum standards for support and protection of victims carries clear obligations on States to provide appropriate services including targeted and integrated support for victims with specific needs. The best practice of providing a holistic range of services is also recognised internationally, including the need to ensure women and girls can access services in women-only spaces, where there is a strong understanding of the causes and impacts of VAWG. Commitments to the provision of services are included within the Home Office *Call to end VAWG*, however they are not expressed as targets to ensure specialist services are available to meet the levels of need or to ensure local accessibility. The maintenance of a strong and sustainable specialist VAWG sector is crucial to protect and support victims and survivors, and it is this sector that is under threat.

Funding crisis within Specialist VAWG services

⁵² EVAW along with partners Eaves, Object/Turn Your Back on Page 3 and Equality Now gave evidence to the Leveson inquiry in 2012 about the way the British press reports on violence against women in prejudicial style alongside often inaccurate sexist or sexualised portrayals of women..

<http://www.endviolenceagainstwomen.org.uk/preventing-violence-against-women-media-152>

⁵³ <http://www.endviolenceagainstwomen.org.uk/news/138/extreme-porn-womens-groups-welcome-criminalisation-in-new-justice-bill#sthash.Jha7aWhB.dpuf>

7.2 A number of EVAW's member organisations provide frontline specialist independent VAWG services and are reporting significant problems with funding, with many struggling to find sustainable funding, and under extreme financial pressure, some facing closure. Whilst so few women are prepared to report their experiences of violence, and with the difficulties many women face in taking their cases through the criminal justice system, independent women-only services, designed to provide support and advocacy for women victims, such as refuges, rape crisis centres, specific specialised services for minority women, are particularly crucial.

7.3 **Cuts to funding and changes to commissioning:** EVAW members report that their services are under threat. In addition to the research undertaken by Professor Sylvia Walby, indicating a 31% cut in funding of domestic and sexual violence services, at local level, local authorities in England cut spending on services for women (including refuges, domestic violence advocates, victim support centres and centres for women who have been raped or sexually assaulted) by an average of £44,914 each when compared to budgets since 2009.⁵⁴

7.4 Short-term commissioning cycles of between one and three years are destabilising specialist community-based provision. Commissioning carries additional transaction costs: service providers must begin to prepare up to a year in advance to rebid for services, diverting valuable resources away from front line provision. Towards the end of a service contract, waiting lists close at the point where they threaten to extend beyond the period of the contract of service. In practice this means that, for example, in parts of London, during the last six months of the service contracts ending in March 2014, no new clients could be accepted, and there has been no service availability for that period.

7.5 Organisations critical to prevention work are also experiencing cuts to services. RESPECT services working to reform male perpetrators of domestic violence suffered budget cuts so that between 2010 and 2011 78% of services reduced the number of clients they were able to assist.⁵⁵

7.6 There is also concern that small women-specific providers will not be able to tender for contracts because of their size and the relatively high cost of delivering quality services for what is largely a high need but low risk group in the criminal justice system. This could result in the closure of existing services, denying women access to much needed support putting them at risk of continued VAWG.

Interview with Service Manager, March 2014: "North Devon Against Domestic Abuse (NDADA) has delivered domestic abuse services to our local community for 37 years and has successfully delivered contracts on behalf of Devon County Council for many of those years. Devon County Council members have taken the decision that all services (even non statutory ones) should be acquired through the competitive tender process and under these rules NDADA in partnership with the two other domestic abuse specialist services in Devon submitted a bid for the county contract.

Unfortunately we were unsuccessful. This in no way means that the services we deliver are not up to standard. In fact, as a voluntary organisation committed to serving our

⁵⁴ <http://www.trustforlondon.org.uk/news-and-events/news-and-comments/professor-sylvia-walby-reports-on-the-impact-of-cuts-on-violence-against-women-services/>

⁵⁵ Data from RESPECT London cited in: <http://www.trustforlondon.org.uk/news-and-events/news-and-comments/professor-sylvia-walby-reports-on-the-impact-of-cuts-on-violence-against-women-services/> and <http://www.theguardian.com/society/2012/jan/31/domestic-violence-victims-risk-cuts>

community with skill, knowledge and passion, we have always endeavoured to make sure every penny of funding possible has gone straight into service delivery.

This means of course, that in a competitive tendering situation we do not have at our disposal the kind of legal, human resources and bid writing expertise that other, often bigger, organisations have. We were, quite simply, through lack of experience, unable to convey within our submission and in the way required by the inflexible process, the information needed to enable our bid to be successful. Indeed only 2 years ago a DCC commissioned external evaluation of our services found us to be cost effective and offering excellent value for money.

That external evaluation involved many people including stakeholders who made comments like, "we rely on the expertise of NDADA who have such local knowledge particularly in the field of safeguarding". The evaluation cost tens of thousands of pounds. It seems rather a sad state of affairs that the politicians are happy for all the hard work to go to waste in the climate of competitive tendering. The local authority procurement process is arduous and full of pitfalls for the uninitiated.

We will surely see more and more evidence of really good local services with all their commitment to their community and ability to offer gold plated service in the most cost effective manner, being driven out in an attempt to "streamline and cut costs". I believe that in the long run the opposite will be true and by the time the politicians realize this, all the local networking, partnership, goodwill and passion will be gone and be impossible to revive".

7.7 Specific threats to women-only and women-centred services: Research suggests⁵⁶ that women value women-only services and services provided by women. The particular issues involved in VAWG, especially sexual violence, mean that it is often difficult (and often unsafe, for example, in cases of stalking) for women to access services provided by men or in mixed sex spaces. There is evidence that women who are victim/survivors of rape and sexual abuse, are reluctant to access generic services (in the case of one service in London, women attempting to access such a service were subject to sexual harassment in the common waiting areas). BME specialist women's services are also facing racism within the commission processes, where there is a failure amongst commissioners to recognise the particular needs of BME women. There is still a need to persuade decision-makers that women-only services, including BME women's services, run by women's organisations, make sense in protecting women's rights, in working to prevent VAWG, and make sense financially.

A specialist BMER VAWG organisation in London stated:

We have been engaged in commissioning and tendering for approximately 5 years and we have only had a few opportunities where we have been able to submit a tender. The main reasons that we have not been able to submit have been:

- (1) inclusion of services to men within VAWG tender specifications which is an exclusion criteria for women only organisation thus excluding them from processes from the outset, in other words, excluding on the basis of gender specialism;
- (2) the link made by commissioners between the inclusion of services to men as representing value for money for VAWG services without sufficient evidence of savings having been made where men are included or the opposite being true, that women only

⁵⁶ Corry, D, Dhani, K, Hudson, I, Moore, K & Powhare, T (2007) Why women only? The value and benefit of by women, for women services. Women's Resource Centre

services and gender specific economies of scale generally, are inefficient and wasteful of the public purse;

(3) assumption made, rather erroneously by commissioners who lack knowledge of VAWG, that women will access gender neutral services when in reality, gender neutrality has the effect of marginalising women by presenting yet another barrier for women at risk of or surviving DSV to access safe services; and,

(4) detrimental impact on black women's specialist services which are often excluded by mainstreaming criteria on the basis that black women's services should cater to all women and that specialism does not represent value for money.

Overall commissioners are using economic austerity to target women only services and specifically, black women's specialist services suggesting that such services do not represent VfM. No evidence has been produced by commissioners to support the assumption however the assumption underlines policy and strategy and is reflected in local commissioning plans".

Specialist domestic violence services

7.8 Removal of ring-fenced funding: There is currently no obligation in UK domestic law on local authorities to fund specialist VAWG services (Although the Istanbul Convention and the European Directive on Victims will create new rights). However, dedicated (or women-only) domestic violence services have been provided in England for around 40 years. The 'Supporting People' budget used to provide ring-fenced funding streams for refuge services. For organisations like Women's Aid England, this was one of their core sources of funding.

7.9 However, following removal of the ring fencing, Local Authorities currently have discretion about what they wish to fund. There is a resulting trend away from commissioning specialist services towards cheaper services from non-specialist housing associations and generic charities, as well as private companies such as G4S that do not have the same experience or track record of supporting women and girls, especially those with complex needs. This is a pattern reported by ERAW members throughout the UK, and particularly amongst services for BME women.

7.10 The Women's Aid Annual Survey (2013) showed services under unprecedented pressure, in particular reduced funding which left some services without funding, loss of staffing for children's services, together with increasing numbers of women with mental health issues seeking refuge. 48% of respondents to the Survey reported they were running their service without dedicated funding; most of those were services for children and young people, or for BME women. Over half were using their reserves in order to continue.

7.11 **Unmet need:** In England, more than a third of local authorities do not have a refuge in their area. There are geographical variations: for example, London has the most; rural areas have the least. On the Women's Aid England census day (Thursday 27 June 2013, which collects data on one typical day) 155 women with 103 children were turned away from the first refuge they approached.

7.12 A further report from Women's Aid '[A Growing Crisis of Unmet Need](#)' found that between 2010 and 2013 there has been a rise in generic service provision provided at a cheaper price, and a loss of specialist domestic violence providers. So whilst there were 98 more bed spaces in 2013 than 2010, there were 21 fewer specialist refuge providers.

Funding for organisations run by BME women have been disproportionately cut, whilst 80% had reported an increase in referrals to their services (between 30-50% over a six month period), a third of BME led services have experienced significant loss of funding.⁵⁷

7.13 The overall picture illustrates a downward trend in specialist independent refuge and domestic violence service provision, with generic housing providers picking up contracts with funding to provide accommodation. Support for victims and survivors of domestic violence is being seen narrowly in terms of alternative living accommodation, but this is only one aspect of support. Crucially, such accommodation provision should be in safe locations where the identities of women can be kept secret in order to ensure their protection from perpetrators. There are concerns that generic housing providers are not in a position to assess the risks facing women fleeing domestic violence, to understand their special needs regarding accommodation and security, and cannot provide a range of other support services to properly meet the needs of domestic violence survivors.

Insufficient specialist service provision for survivors of sexual violence

7.14 In 2011/2012 the police in England and Wales recorded 53,700 sexual offence including 16,000 rapes and 22,100 sexual assaults. 37% of the reported rapes were against children under 16 years of age.⁵⁸ Sexual violence still remains one of the most underreported crimes. 38% of women victims of the most serious sexual offences did not tell anyone at all. 87% did not tell the police. These figures suggest that there is something uniquely difficult for victims about disclosing sexual violence.

7.15 Specialist support services for victims of sexual violence (those whose primary and major purpose is tackling and preventing sexual violence, and supporting survivors) are limited. Many women live outside the catchment area for services. Those that do exist are able to operate only for limited hours, sometimes only one or two days a week; they do not enjoy sustainable state or other funding.

7.16 Strategic funding by central government via the Rape Support Fund (RSF administered by the Ministry of Justice) has reversed a trend of closures of independent Rape Crisis Centres, providing funds to open new Centres and partial funding for others. However, the RSF does not fund all centres, nor does it fund any Centres sustainably.

7.17 **SARCS:** There are 45 Sexual Assault Referral Centres (SARCS) across England providing a range of services including: medical care, forensic examination, and *initial* support from a crisis worker and the police. A SARC is likely to cost over £1m per year to run. However, only a very small percentage of victims go to SARCS. About 84% of referrals to SARCS in England are from the police, so come from the 13% of victims who report to the police. SARCS are only able support victims of recent assaults typically within the forensic window of 7 days, and so are unable to provide any support to victims outside of this window.

7.18 Women are also routinely referred to Rape Crisis. These referrals are a welcome acknowledgement that specialist women centred services are vital, but there is no funding attached when women are referred from SARCS, therefore they are largely unfunded and put increasing strain on services.

⁵⁷ <http://www.womensaid.org.uk/page.asp?section=00010001001400130004§ionTitle=Growing+Crisis+of+Unmet+Need>

⁵⁸ Figures from the Crime Survey England and Wales (a state survey of a random sample of the population, and enables us to judge the extent of unreported crime), suggests there were up to 95,000 rapes in 2012, the overwhelming majority were by men against women.

7.19 **Independent Rape Crisis Centres:** There are 48 Rape Crisis Centres (and a number of other rape support centres outside the national Rape Crisis network) in England and Wales. (Rape Crisis Scotland and Rape Crisis in Northern Ireland run separate networks), so many women are outside of the reach of centres. Rape Crisis Centres provide specialist support, advocacy, counselling and information to women and men (with safe, women-only spaces); free of charge and in confidence, regardless of whether the sexual violence is reported to the police. They are independent of government and the criminal justice system. These elements – woman-only and independent – address two of the issues that inhibit women from seeking help from statutory services. 60,000 women access services every year, and 120,000 are supported through the sexual violence helpline.

7.20 Although considerably cheaper than SARCs to run (the network costs around £15 million per annum as opposed to an estimated £1 million per SARC), Rape Crisis receives only a small proportion of its funding from statutory sources (including the Ministry of Justice Rape Support Fund and Victim Witness General Fund and a limited number of regional and local agencies), relying on charitable donations for the rest. Services are constantly working with waiting lists and receiving unfunded referrals from statutory partner services. More than half the Centres in receipt of local authority funds had them cut in 2011/12, with a consequent impact on service provision for victims.

7.21 The situation is even more difficult in Wales where there is currently only one Rape Crisis Centre covering the north, although a new service in mid-Wales is expected to open within the next 3 years. The majority of women and girls in Wales still do not have access to specialised support from Rape Crisis, despite the Welsh Assembly Government publishing an integrated VAW strategy in 2010 and consulting on a VAWG bill in 2013.

Services for women in prison

7.22 Although the high levels of experience of domestic violence and sexual violence are recognised in women in prison policies, this has not translated to sufficient or consistent provision of programmes for women. Not all women prisons have programmes to address experiences of violence, which means women may not be able to access any support at all whilst in prison. Services on release are thin on the ground, leaving this group of women particularly vulnerable to on-going violence and abuse. There are examples of good practice models, but these are insufficient in number to meet the needs of women.

Good practice services for women in prison and women offenders:

THYME PROJECT: This project provides ‘Through the Gate’ support and counselling services to women in prison and returning to London who have experience of domestic or sexual violence. The project aims to support women to address on-going, or past issues resulting from abuse through counselling, group work and practical support and advice to recognise when they are in dangerous situations. There is a focus on women finding their voice and power and establishing clear boundaries in what is acceptable and unacceptable to them. Through this support women in the criminal justice system are assisted to live safely, make better life choices, and address the root causes of their offending behaviour. The project provides training to other domestic violence organisations around the specific intersectional needs of women in the criminal justice system. This project currently has a waiting list.

BETH CENTRE: The Beth Centre is a partnership between Women in Prison and Eaves Housing for Women. It provides women from the London borough of Lambeth

who are either at risk of being drawn into, or are affected by, the criminal justice system, with a holistic set of support services from a safe, women-only centre, situated in the borough.

7.23 Lack of access to safe, secure housing on release puts women at risk of return to situations of violence. In March 2012 Women in Prison conducted research into the housing needs of women leaving prison – 80% of women accessing Women in Prison’s housing services are deemed to be intentionally homeless as a result of their imprisonment. This research found that without secure housing the likelihood of re-offending and gender based violence increased. Lack of housing also prevents women from being able to address other vulnerabilities such as substance, mental and physical health, debt and a lack of basic life skills.

Services for women in prostitution

7.24 Women in prostitution need access to specialist services – this includes harm minimization services that support women while in prostitution but it also requires access to specialist support for women who wish to exit prostitution and the opportunity to develop new education and training opportunities for viable long term alternatives. Services for women in prostitution including those looking for support to exit prostitution, are also experiencing the same funding constraints as other services.

8 Protection

8.1 For women to realise their rights to live free from violence, protective measures must be available across all forms of VAWG and accessible to all women, encompassing protection through services and support networks, through appropriate and effective interventions from frontline agencies, protection through civil law, and protection for women and girls in public spaces.

8.2 Protection is not just about immediate safety but also a deeper sense of safety and human security. Effective protection needs to begin from recognition that women’s vulnerability is shaped by context. The provision of high quality and appropriate support services is a core foundation of protection, since services keep women safe in the moment (through crisis intervention) and in the aftermath of violence (through ongoing practical and emotional support). Service provision that truly protects, needs to be available round the clock, free of charge and able to meet the needs of women with specific language, disability, and mental health requirements.

8.3 Enabling women to access protection also means creating options to secure their own safety for example through welfare provision. Women are three and a half times more likely to be subject to domestic violence, two and half times more likely to experience sexual violence and more vulnerable to stalking if they cannot find £100 at short notice (Walby & Allen, 2004). This illustrates connections between VAWG and wider gender equality. It also reveals how women with no recourse to public funds are especially vulnerable to violence since they are unlikely to have independent income.

8.4 Effective protection measures rely on ensuring the right policies are in place to meet the different needs of women, that essential services that best meet women’s needs are available and accessible, that frontline agencies including police, are properly trained and

educated about VAWG, its causes and consequences, clearly recognize risk factors for women and girls, and are enabled to respond promptly, and effectively.

Inadequate and inappropriate Police responses

- 8.5 ERAW members report continued serious failings in the response of police to VAWG, contributing to failures to protect women, and missed opportunities for interventions. Where there are good examples of police responses, they are cited as being down to the actions of individual committed officers, underscoring the critical importance of knowledge, understanding and training.
- 8.6 Specialist domestic violence officers, and specialist domestic violence units, whilst providing the framework for improved protection, are far too low in numbers across all police forces. The lack of investment in specialist officers and units is seriously hindering the effectiveness of this approach and undermining efforts to improve police protection and response.
- 8.7 Without specialist trained frontline officers, women may not be believed, or they may be partially or wholly blamed for the violence they have suffered. In February 2014 it was reported that two West Midlands police officers were facing a misconduct inquiry after an abusive voicemail message was left on the phone of a woman who had made a domestic violence complaint. Such incidents indicate why trained specialist responders are so important in relation to VAWG.⁵⁹

Women in State institutions: prisons and detention centres

- 8.8 **Insufficient women-only facilities:** In Northern Ireland, there are no separate women specific prisons, and so female prisoners are incarcerated within a male Young offenders Centre. This leads to risk arising from the lack of specific regime designed, delivered and staffed with women in mind.
- 8.9 Concerns have also been cited around the overuse of strip-searching, and verbal abuse directed at women in prison and in prison vans during transportation. There are also instances of women and men prisoners being transported together. A recent inspection report in Northern Ireland highlighted that all women were needlessly strip-searched on arrival, and then randomly after visits, which was seen as excessive. There is little or no VAWG support for prisoners, victims of domestic violence or involved in prostitution were not effectively identified and virtually no support was offered to them.
- 8.10 Scotland has one women's prison (HMP Cornton Vale), however, in Scotland, women are also held within men's prisons. Around 110 women are in HMP Edinburgh, 53 women in Greenock Prison's Darroch Hall, and there are small community integration units for women at HMP Inverness and HMP Aberdeen (Statistics from Scottish Prison Service website).
- 8.11 A damning report on the treatment of women in the criminal justice system in Scotland was published in 2012; this report stated that Cornton Vale is not fit for purpose. Overcrowding has caused significant problems for the management and staff, and has inhibited opportunities to rehabilitate women and reduce their reoffending on release.

⁵⁹ <http://www.theguardian.com/uk-news/2014/feb/19/west-midlands-police-abusive-voicemail-victim>

- 8.12 **Use of strip-searching/ full searching:** Routine strip-searching of women on entry into prison in the UK was officially abolished in 2009 and any strip-searching (referred to as “full searching”) that is carried out must now be based on intelligence. However, there is no centrally held record of the number of full searches carried out, nor of the percentage of these that yield positive findings. Therefore it is unclear how the government is monitoring whether the requirement to be intelligence-led is being met. This is despite provisions in Article 10 of the International Covenant on Civil and Political Rights that state ‘All persons deprived of their liberty shall be treated with humanity and with respect for the inherent dignity of the human person’.
- 8.13 **Physical and mental health needs of women offenders:** A study published in the Lancet in December 2013 found that between 20-24% of female inmates self-harmed per year, which was more than ten times higher in female prisoners than in male. Repetition of self-harm was common, and the risk of suicide higher in those who self-harm than in the general prison population with more than half of deaths occurring within a month of self-harm. In female prisoners, a history of more than five self-harm incidents within a year was associated with subsequent suicide.
- 8.14 The Equality and Human Rights Commission Human Rights [Review 2012](#) expressed concern regarding women self-harming whilst in prison, and has reported concerns around the failure to protect individuals from harm they cause to themselves in State custody, and the disproportionate rate of self-harm amongst women prisoners.
- 8.15 **Male wardens in female prisons:** The Chief Inspector of prisons reported in 2011 (the most recent inspection) that in HMP Holloway: *“Some (women) reported unwanted attention from male staff which they did not believe was appropriately dealt with and they had little confidence that anyone in authority would listen to them. They were disconcerted about male night staff observing them through hatches. Given the life experiences of many women prisoners, these reports were a particular concern. Some male staff were under investigation for alleged inappropriate behaviour, but senior managers said it was often very difficult to get conclusive evidence even when they had identified concerns about specific individuals.”*
- 8.16 An acting prison governor was jailed for five years in 2011 following a conviction for misconduct in a public office after a three year “relationship” with a prisoner in which he “demanded the frightened inmate perform a sex act on him, saying: ‘It’s an order’”. It is very difficult to get concrete information or data on abuse of women in prisons as they are very cautious about reporting any abuse due to fear of repercussions.

9 Prosecution

- 9.1 The Crown Prosecution Service VAW Strategy, launched in May 2008, is an example of good practice as it is based on a gendered understanding and ‘provides an overarching framework for crimes that have been identified as being committed primarily by men, towards women victims.’
- 9.2 There have also been procedural changes and guidance to improve investigation and prosecution and enhance good practices within criminal justice agencies, and investment in advocacy around the UK.

9.3 The criminal justice system reforms for dealing with victims of rape and domestic violence, forced marriage and FGM have been developed for over a decade by the legislature, police, Crown Prosecution Service and judiciary. Although the systems are by no means perfect, there is a greater recognition of VAW and more admissions when they go wrong. The most senior professionals regularly speak in public about the need to believe victims of rape.

9.4 However, the overall conviction rate for reported rapes in England and Wales for 2012 was as 7%⁶⁰ in Scotland, just 2.9% and there have been no prosecutions for FGM in the UK, though cases are pending, including one case announced on 21st March 2014⁶¹. A huge challenge for the criminal justice system is how to combine outcome and procedural justice to ensure victims are treated with respect and dignity throughout the process.

Concerns regarding laws on VAWG

9.5 **Gap in law on coercion and control:** Domestic Violence organisations Women's Aid, Paladin and Rights of Women have identified gaps in protection, as the current legal system in England does not criminalise coercive and controlling behaviour that happens within an intimate relationship.

9.6 On 31 March last year, a new definition of domestic violence was issued by the Home Office to include:

"Any incident of pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners of family members regardless of gender or sexuality. This can encompass but is not limited to the following types of psychological, physical, sexual, financial, emotional.

Controlling behaviour is: a range of acts designed to make a person subordinate and/ or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim." This definition includes so-called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group. However, this update in definition is not a legislative change.

9.7 Whilst this update in definition is not a legislative change, it raises a number of concerns. The changes to the definition in 2013 have not provided clarity, but risks causing more confusion and conflation. The definition still does not clarify the gendered analysis of male violence against women, even though it is well established, including by the UN, that gender based violence is both a cause and a consequence of women's inequality. This is disconnected from the definition in the *Call to End VAWG*, which uses the UN definition of violence: violence that takes places 'because she is a woman' or happens 'disproportionately to women'.

⁶⁰ <http://www.leftfootforward.org/2013/02/rape-low-conviction-rate-in-the-uk/>

⁶¹ <http://www.bbc.co.uk/news/uk-26681364>

- 9.8 There is a conflation between family violence and intimate partner violence, which will cause problems in data analysis, conflating acts of violence by siblings, or parents and children with intimate partner violence.
- 9.9 Earlier definitions for example in 2005, included forms of violence disproportionately experienced by minority women, including FGM, forced marriage and honour based violence in the main text, but the new definition makes it a footnote. This plays into the 'othering' of forms of violence that mainly affects minority women, which many women's organisations have struggled to challenge and overcome.
- 9.10 The inclusion of 'any incident' (made necessary by inclusion of forms of violence usually single incidents such as FGM or forced marriage) as well as 'any pattern' continues to obscure the reality of intimate partner violence, failing to address that intimate partner violence is a pattern of coercive control. This could mean that prevalence data from the Crime Survey of England and Wales will remain confusing and misleading. Any incident, which could mean a single push, slap or incident of emotional or psychological abuse will be given the same weight as repeated and arguably more dangerous acts such as strangulation or threats to kill.
- 9.11 The new definition also continues to marginalise rape and sexual violence, limiting such violence as experienced by people over 16 years of age.⁶²
- 9.12 **FGM:** Over the nine years that the FGM Act (2005) has been in force, there has not been a single successful prosecution for FGM, although recent announcements of a prosecution have been made. Successful implementation of this law will only come with a package of awareness-raising, training of frontline agencies, and investment in specialist women centred services to particularly support those women and girls at risk or who have undergone FGM. Furthermore, the FGM law does not provide protection for all women and girls at risk, as it covers only UK nationals or those with indefinite leave to remain, but does not cover those in the UK on temporary visas, or seeking asylum.
- 9.13 **Criminalisation of Forced Marriage:** The criminalisation of forced marriage is due to come into force. Women's organisations are concerned that the criminalisation of forced marriage, if not implemented properly and supported with a package of actions for education and raising awareness about the law, and to support girls and young women at risk of forced marriage, that the law may prove to be counter-productive, and girls and young women will be discouraged in reporting their fears of a forced marriage to frontline agencies. The Government has promised a package of measures, including funding, to support the creation of a new criminal offence of forced marriage; however it is still unclear whether any of this will fund VAWG sector specialists to deliver prevention work. The priority should be to prevent a forced marriage occurring in the first place.
- 9.14 **Trafficking:** The UK is a signatory to the Council of Europe Convention on Action against Trafficking in Human Beings. The Westminster Government is bringing forward a Modern Slavery Bill which includes proposals for an Anti-slavery Commissioner role, slavery and trafficking prevention orders, and aims to consolidate all related offences into one place.
- 9.15 **Prostitution:** In the UK, selling or buying sex is not illegal. However many of the activities associated with it are, such as loitering and soliciting for prostitution, kerb crawling, causing or inciting prostitution for gain, keeping a brothel and placing an advert

⁶² Concerns on the definition of domestic violence drawn from Professor Liz Kelly's evidence to the All Party Parliamentary Group (APPG) enquiry into Domestic Violence, 2013.

for prostitution within the vicinity of a public telephone box, and paying for the sexual services of a prostitute where a third person has engaged in exploitative conduct.

- 9.16 In February 2014, the All Party Parliamentary Group on Prostitution and the Global Sex Trade, raised concerns about the current law surrounding [prostitution](#). During their Inquiry into the law in England and Wales, it found that “legislation is complicated and confusing, and loopholes allow men to escape prosecution for abusing girls as young as 13, and women trafficked into the country to be repeatedly raped”. The report states: “Our conclusion is stark: because our lawmakers send no clear signals about the nature of prostitution, the most visible – women who sell sex – are targeted, while men who create the demand often walk away, without taking responsibility for the damage they do”.⁶³

10. Questions for government and recommendations

Questions for government

1. How does the Home Office intend to ensure support for and implementation of the Westminster Call to End VAWG and Action Plans across all Government departments?
2. Will the Northern Ireland Government build on their domestic violence strategy to develop a VAWG strategy for Northern Ireland?
3. What plans will the Westminster Government put in place to ensure application of consistent policies across all areas relevant to VAWG, in particular
 - a. Will the government consider expanding the Sojourner Project for all women in the UK on visas, to ensure they can access emergency accommodation and support?
 - b. How will the government improve the situation for women asylum seekers?
 - c. Will the government end the detention of female asylum seekers?
4. How will the all governments ensure sustainable funding for specialist women-centred VAWG services, and build on the network of specialist VAWG services to meet the needs of women and girls in all areas? How will the Westminster Government meet the UK’s commitments under the Istanbul Convention and the EU directive on victims as funding streams are devolved to local level?
5. Will the Westminster Government commit to continuing the Rape Support Fund?
6. Will the Westminster Government include specialist women’s VAWG services in guidance on EU Procurement Directive’s due to come into force?
7. Will the Westminster Government commit to developing and properly resourcing a sustained programme of work on prevention, covering the wide range of activities outlined in best practice approaches to prevention?
8. Will the Westminster Government ensure funding for projects to support victims and survivors of VAWG routinely in prison and immigration removal centres?
9. Will the Westminster Government introduce routine enquiries about all VAWG in mental health assessments?

⁶³ All Party Parliamentary Group (APPG) on Prostitution and the Global Sex Trade: Shifting the Burden, Inquiry to assess the operation of the current legal settlement on prostitution in England and Wales, March 2014.

10. How will the all governments improve protection and support for women facing multiple, intersecting forms of oppression?
- a) BMER women,
 - b) Women with insecure status and those seeking asylum.
 - c) Women with disabilities including learning disabilities
 - d) Older women
 - e) Girls in gangs and looked after girls

Recommendations

Specialist services

- All UK governments at national and local level urgently address the funding crisis within the specialist women's VAWG sector, especially those providing specialist women-centred prevention, protection and support services.
- An urgent re-think and change of policy in funding for specialist VAWG services is required to alleviate the extreme financial pressures and risk of closure. This could include ensuring sustainable funding centrally, or ensuring compulsory local level funding from Local Authorities including for local level women's VAWG organisations, in order to comply with the Istanbul Convention and the provisions within the EU Directive on minimum standards on the rights, support and protection of victims, and the forthcoming EU Directive on Procurement.
- National level governments should take seriously their international obligations to act with due diligence in providing holistic specialist services that meet the needs of women and are effective in providing protection and support, ensuring their sustainable funding.
- National and local governments should work towards building up and maintaining a strong and sustained network of specialist services meeting the needs of all women.
- Ensure specialist services are available and accessible for BME women and also for refugee and asylum seeking women through dedicated and ring-fenced funding to specialist BMER services. and women facing particular barriers in accessing services including older women and women with disabilities, accessible to women

Prevention

- The Westminster Government must work with experts in the women's sector to develop a strategic, sustained programme of work on prevention including:
 - Making long term investment in public campaigns to change harmful attitudes and behaviours, learning from the THINK! Road safety campaign.
 - Ensuring a whole school approach to prevention including sex and relationship education, teacher training, development of appropriate and effective policies

within schools, and measures to advance gender equality including challenging attitudes and behaviours that are discriminatory.

- Tackling misogynistic images of women in the media that condone abuse, and consistent regulation and restriction of harmful images across all media.
- Ensuring long term investment at both national and local level in specialist support for women and girls who experience abuse, either recently or in the past.

Strengthening the Call to End VAWG and Action Plans

- Ensure all government departments take seriously their role in implementing the provisions in *A Call to End VAWG*, and develop clear implementation plans for key departments in consultation with women's organisations and VAWG experts.
- Improve cross-government coordination on VAWG related issues and consistent approaches to tackling VAWG that prioritise the human rights of victims and survivors.
- The Westminster Government should develop and implement, in consultation with women's organisations, an overarching gender equality strategy.
