

Our Alternative White Paper on Domestic Abuse

Ten point plan for change

SafeLives wants to end domestic abuse for everyone, for good.











Government-commissioned research shows that domestic abuse had an economic and social cost of around £66bn in 2016/17. This huge sum includes amongst other costs: the social cost of physical and mental harm, the cost of policing, justice, medical and mental health response and lost economic potential from people unable to be at work.

For a tiny fraction of this figure, the government could invest in prevention and provide a better, earlier response to those who have already been affected by domestic abuse, reducing long term costs and saving untold harm to individuals, families and wider society.




We welcome the government's refreshed consultation response and its draft Domestic Abuse Bill. Together they provide an important step forward in addressing a crime that affected at least two million people last year.

In preparing for our engagement with the Bill, we created Every Story Matters, an online platform where survivors could say, in their own words, what needs to change. Hundreds of people responded to this call in just a few weeks, proving that survivors want to be heard. This response honours, and has been informed by, their voices.

We suggest that within its plans to improve the domestic abuse response in England and Wales, the government focuses its funding and energies on ten key areas. Some are well covered in the government's proposals, but in others, more progress could have been made. We summarise this below.

No	Detail	Could the bill and non-legislative package significantly improve this?
1	Identify and stop harmful behaviours, with a comprehensive perpetrator strategy	
2	The health sector must step up its response, as the first port of call for many living with domestic abuse	
3	Commission a comprehensive spectrum of specialist support services for adults, working to high standards in every local area and online	
4	Meet the needs of children. Ensure the response is linked with the response to other family members	
5	Streamline the criminal, civil and family courts, holding perpetrators to account and supporting survivors to access justice and be safe	
6	Train people in a position to help, giving them clear policies on their role in responding to domestic abuse.	
7	Fund a comprehensive range of housing options for victims and perpetrators	
8	See domestic abuse as part of a whole picture, linked with other adverse experiences	
9	Change the public conversation with a campaign highlighting the voices of survivors and supporting and challenging perpetrators to question their own behaviour	
10	Make the new Domestic Abuse Commissioner role fit for purpose, with independence, and a comprehensive approach to domestic abuse built in from the outset	

Key

-  Lots of progress in the bill and supporting package
-  A little progress in bill and supporting package
-  No progress in the bill and supporting package

The ten point plan in detail

1. Identify and stop harmful behaviours, with a comprehensive perpetrator strategy.

The government's own figures, which put the cost of domestic abuse at £66bn a year, speak for themselves. The price of ignoring domestic abuse is enormous. Perpetrators of domestic abuse disproportionately repeat their crimes. Less than 1% receive a specialist intervention to change their behaviour and yet 80% of survivors wish their partner or ex-partner had been offered one. Policy makers need to stop thinking 'why doesn't she leave?' and start asking 'why doesn't he stop?'

"[I wish] that they would face some kind of consequences for what they have done. Victims live with the repercussions, but perpetrators move on and do the same again as nothing stopped them."

Survivor

We welcome the government's proposals to improve the identification and assessment of perpetrators and increase the use of quality rehabilitation programmes. We'd like to see these measures as part of a more comprehensive perpetrator strategy.

Right now, provision for perpetrators is patchy and unregulated. Anybody can set up a project with perpetrators, so we have no way to ensure practice is safe and effective. We welcome the commitment to develop and publish standards on perpetrator interventions. Good intentions are not enough to attempt to tackle a deeply complex and dangerous social ill.

We recommend:

- **A well-evidenced, accredited national programme of perpetrator provision**, so that perpetrators are held accountable and efforts are made to change their behaviour to protect current and future victims. This would have an upfront cost of around £45m – 0.07% of the cost of domestic abuse – in England and Wales. If it managed to reduce the costs associated with perpetrators by just 20%, it would represent a break-even case. If it were able to reduce the costs further, the government would begin to realise savings.
- **The establishment of a coordinated multi-agency response in every police force area** that brings together agencies such as probation, mental health, housing and others to provide an urgent response to the most dangerous perpetrators.
- **The development of the first national strategy on men and boys, examining the links with other experiences, behaviours and offending, such as youth crime, mental health problems and drug-related violence.** To truly change harmful behaviour affecting our society, we must look at the whole picture and act at a societal level.

Perpetrator interventions are for people whose behaviour is already problematic. Primary prevention work is required to stop abuse before it happens. A comprehensive new strategy by the government would include hearing the voices and experiences of boys and men and support online work to nudge behaviour and attitudinal change, as well as more traditional offline methods. This should include proper investment in effective delivery of the new Relationship and Sex Education curriculum.

2. The health sector must step up its response, as the first port of call for many living with domestic abuse

We'd like to see deep engagement from the Department of Health and the NHS on an issue that costs them and individuals dearly. The biggest component of the estimated £66bn cost is the physical and emotional harms incurred by victims (£47 billion). There are significant health service costs incurred by the NHS in addition to this. These costs point to an urgent need for action. We know that victim/survivors are far more likely to see a health professional about the physical or mental health impacts of domestic abuse than talk to the police. By stepping up its response, the NHS stands to save itself money, transform the domestic abuse response and significantly reduce harm to individuals, families and wider society:

"[We should be] talking about it more, this should happen in all sorts of places, GP's should ask about it"

Survivor

The Department for Health and Social Care (DHSC) and the Care Quality Commission (CQC) should track every Trust's performance on domestic abuse. NICE (The National Institute for Health and Care Excellence) has already developed standards for how different types of NHS services should spot and respond to domestic abuse. The DHSC and CQC should require trusts to report back on how they are performing on those standards.

We know the NHS stands to save millions by investing in identifying domestic abuse sooner. We welcome the government's intention to produce a four-year plan to raise awareness amongst NHS staff and address the issue of NHS staff who are themselves victims. These efforts to improve general awareness should be complemented by proven investments in specialists. Two specialist domestic abuse workers based in every hospital in England and Wales would have an upfront cost of £15.7m but generate a **net saving of £16.4m (a saving of £1000 per patient seen) through decreased use of acute care.**

Roving specialist domestic abuse workers linked to GP practices have also been shown to support victims sooner and save the NHS money. Ideally, one specialist per 25 surgeries is needed – this would cost £24.75m, ensuring coverage across England and Wales. A peer reviewed academic study found that this would produce net ‘societal cost savings’ of £37 per woman registered at each GP practice per year.¹

We know that domestic abuse is under-identified in mental health services. Our recent national scrutiny panel on mental health also found that victim/survivors with mental health problems are more likely to be in relationships with perpetrators with similar mental health issues, presenting a particular risk dynamic. Given the strong links between domestic abuse and mental ill-health, mental health trusts should invest in domestic abuse specialists to enhance risk assessment and inform safely and support planning.

Public Health England and Public Health Wales should be key contributors to increased public awareness about the prevalence, dynamics and responsibility for domestic abuse. While we welcome the NHS Long Term Plan including and the government’s commitment to 2.3 billion a year towards mental health services, we would like to see evidence-based NHS prevention programmes for domestic abuse, working upstream of the problem in the same way as has been set out for obesity, smoking, diabetes and other public health epidemics.

3. Commission a comprehensive spectrum of specialist support services for adults, working to high standards in every local area and online

We welcome proposed investments in services for people who are currently under-served – such as victims who are disabled, those with insecure immigration status, LGBT and BAME victims and those over 60 years old. These populations should be considered in all commissioning. All services for adults should consider the needs of the 50%+ of survivors who don’t plan to leave or separate and of survivors with complex needs, such as substance abuse.

Commissioners need to support victims of all kinds and at all levels of risk. These services should meet the terms of what is known as the ‘National Statement of Expectations’ published by the Home Office. The Office of the Domestic Abuse Commissioner should hold local leaders to account for delivering this, publishing an annual report on progress towards meeting the standards.

We recommend that services commissioned should include:

- **High quality outreach services which support victims before harm escalates** or where imminent danger has reduced, increasing a victim/survivor’s understanding of the situation and options, and promoting resilience
- **A minimum of one Independent Domestic Violence/Abuse Adviser (Idva) per 100 cases where a victim is at risk of serious harm or murder.** Currently a further 300 Idvas are urgently needed at an additional cost of £15m beyond existing IDVA funding. This is the same amount the government receives annually in VAT from the purchase of sanitary towels and tampons.
- **Accommodation options;** considered in Section 7 below.

Why do we need more Independent Domestic Violence/Abuse Advisors?

Independent Domestic Violence/Abuse Advisors (Idvas – Idaas in Scotland) support victims of abuse to become safer, sooner. They walk alongside the victim/survivor and act as a staunch advocate for their needs with multiple agencies. It is crucial that every victim at risk of serious harm or murder has this kind of support.

When someone discloses about an abusive partner/ex-partner/family member they may need to engage with a whole host of confusing and sometimes conflicting services: the courts, probation, housing, mental health, children services, substance misuse. Idvas help them to do this.

However, there are not enough Idvas and some victims/survivors remain ‘hidden’ from services, never getting the help they need. For example, our Spotlight on older people and domestic abuse found that older victims typically experience abuse for twice as long as those aged under 60 before getting help, while our Spotlight on disabled people and domestic abuse found that disabled people typically experience abuse for a year longer than those without a disability, leaving them and their families vulnerable.

“If it wasn’t for the service I honestly don’t know where I would be now (my family would probably say six feet under)... My Idva took so much time determining how I felt and what I wanted to achieve – in a way it was my first opportunity in a long time to speak about how I actually felt, and also to know that my voice was being heard.”

Survivor

Idvas can safely work with a maximum of 100 cases a year. We need to fund an additional 300 Idvas just to support all victims at risk of serious harm or murder*. 300 additional IDVAs would cost £15m (the amount of money the government receives annually in VAT from the purchase of sanitary towels and tampons).

¹ <https://bmjopen.bmj.com/content/2/3/e001008>

4. Meet the needs of children. Ensure the response is linked with the response to other family members

Domestic abuse has a devastating impact on children and young people that can last into adulthood. **Only 50% of children in violent households are currently known to children's services.** We welcome the £8m proposed for children affected by domestic abuse and the proposed investments in training for children social care services.

“One [of my children] has PTSD and the other two are quite anxious, the middle one believes her father will kill me because he told her he would”
Survivor

Local responses must include services for children living with domestic abuse and other adverse experiences which often co-exist (such as alcoholism at home). We need more Young People's Violence Advisers (Ypvas) and specialist children's workers. It would cost just £2.5m to provide Ypvas across England and Wales.

It is also important to **invest in training for teachers so that they can deliver the new Relationships and Sex Education curriculum well.** The right delivery will help children to understand the difference between healthy and unhealthy relationships and build a generation less tolerant of domestic abuse. It should also begin to address the high percentage of children living in abusive households not known to social services, by giving children the confidence to seek help with the challenges they face.

We urge greater government investment in training than is currently proposed for teachers to be able to deliver what is understandably a sensitive and detailed curriculum and for schools to have the resources to bring in external experts where necessary.

5. Streamline the criminal, civil and family courts, holding perpetrators to account and supporting survivors to access justice and be safe

In the year ending March 2017, there were over 1.1m cases of domestic abuse recorded by the police but fewer than 100,000 prosecutions for these offences.² Making the process less traumatic is an essential part of improving these figures and access to justice for victims. The draft Bill makes good progress in this regard.

Some victims choose not to get involved in legal proceedings for fear of being re-traumatised, others drop out because of their negative experiences. Sometimes perpetrators of domestic abuse use contacts through the family and/or criminal court or criminal process to intimidate their alleged victims, making justice even harder to achieve.

In 2017 the Ministry of Justice issued a guidance note known as '12J' which promoted measures such as separate waiting rooms for alleged victims and perpetrators in courts. The government now proposes to make these measures more accessible to domestic abuse victims, which we welcome. **We welcome the proposed law to prohibit cross-examination by the defendant in family courts for domestic abuse cases and much needed investments to improve the family court experience for victims.**

We also support proposed changes to the Domestic Abuse Prevention Order and the proposed changes to Clare's law.

In addition, we recommend:

- **Improved coordination of civil/family and criminal courts processes.** A perpetrator can have a criminal conviction for domestic abuse, yet civil courts still often go through 'fact finding' hearings to establish whether domestic abuse is a factor in a civil case, such as divorce or child arrangement proceedings. These fact finding hearings should be unnecessary if a criminal court has already convicted a perpetrator. Admissions of domestic abuse in family courts should be more systematically used as evidence in criminal trials. Too often the two work completely separately. We hope the commitment to "Explore options to develop a better and more consistent approach to information sharing across court jurisdictions" is pursued with urgency.
- We'd like to see **an end to the presumption of child contact in DA cases**, a presumption which survivors frequently tell us puts their children in danger.
- We'd also like to see **an end to unsupervised contact during criminal court proceedings once there is a charge with a domestic abuse element.**

“There are repeated occasions I wish I had put up with the abuse to save my child from the traumatic family court processes which have devastated our lives....”
Survivor

² <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/domesticabuseinenglandandwales/yearendingmarch2017/previous/v1#how-prevalent-is-domestic-abuse>

6. Train people in a position to help, giving them clear policies on their role in responding to domestic abuse

We are delighted to see proposals around additional training for responding agencies like the police and new training on economic abuse, including proposed extensions to the roll-out of the 'DA Matters' training programme. **People respond much more effectively to domestic abuse when they understand it better.** Whether it's the police officer who takes the time to talk to a child out of earshot of the person who may be causing him harm, the nursery worker who has concerns that mum is frightened of something, the line manager who overhears a staff member shouting abuse to his boyfriend down the telephone, or the bank and housing staff who know why someone is having to move house or change their mortgage or debt; **all of us can be part of a faster, safer response.**

“If we had had this training a few years earlier we undoubtedly would have saved lives and prevented domestic abuse homicides”

Police Inspector, who took part in the SafeLives 'DA Matters' training programme.

As a priority we'd like to see government support for:

- **A nationwide police culture change programme regarding domestic abuse.** The Scottish government has invested in this nationwide. A match funding envelope of around £10m from the UK government would support forces in England and Wales who have not yet benefitted from training to do so, provide top up training for those who have already done our culture change programme - *Domestic Abuse Matters*, and fund further evaluation, including calculations about cost savings.
- **Domestic abuse training for children and adult social workers.** Our evidence shows that too many children and vulnerable adults are being missed by social services and left in harm's way. The cost of training a critical mass of frontline children and adult social care workers would be around £4.25m.
- We are also keen to see **training in the courts and probation system, health sector and education** and welcome new proposals in this regard.

Staff in a broad range of other organisations have the opportunity to act on their instinct and understanding that someone may be experiencing or perpetrating abuse.

Government departments and agencies should lead the way on this, each with policies in place regarding their role and responsibilities to staff and the public. The UK government should learn from pilot work in Wales, where all public service staff have a **duty to 'ask and act'**. This is of particular importance to frontline agencies such as health, housing, children's services etc.

We are pleased to see proposals for work with UK financial institutions to encourage banks to do more to support victims of domestic abuse. We hope banks will be part of a wider vanguard of private sector employers who are encouraged by government to create a rising tide of expertise, where all of us as citizens play our part in ending domestic abuse.

7. Fund a comprehensive range of housing options for victims and perpetrators

Fleeing with a bin bag of possessions in one hand, and your children in the other is a frightening prospect. The accommodation options for women who do take that step are far too limited and inconsistent.

A greater range and number of suitable housing options must also be available to make it a realistic option to remove the perpetrator from the home and house that person somewhere else, so the victim/survivor and any child(ren) can stay safely where they are.

There should also be greater roll out of sanctuary schemes, specialist community support such as Independent Domestic Violence Advisers (Idvas) and more varied housing options, with refuges remaining as an option suitable for some survivors. The Domestic Abuse Housing Alliance (DAHA) has devised a set of standards to improve public, private and social landlords' response to domestic abuse and we want to see these established as good practice. **The proposed consultation on future accommodation funding options should consider this full DAHA range.**

8. See domestic abuse as part of a whole picture, linked with other adverse experiences

Too often local authority adults and children's teams dealing with domestic abuse operate in isolation, making responses which recognise the connected nature of families a rarity. The response to domestic abuse is held far too separately from responses to other adverse experiences children and adults face, from child abuse, to mental ill-health, to youth crime and economic disadvantage. **Local authorities and the full range of local agencies will benefit from working in a more holistic way, addressing the needs of a whole person,** not one or a series of issues and life stages, and treating immediate and extended family members as they are – as deeply connected to each other.

The Cabinet Office should coordinate cross-government work which acknowledges and responds to the need for a more holistic approach to adverse experiences, overseeing a programme to better coordinate and streamline national strategies, funding and policy, giving a blueprint for this same change at the local level. This would include consideration of the Adverse Childhood Experiences (ACEs) work being adopted in Wales and Scotland, and the 'One Front Door' approach we are piloting in seven areas. One Front Door ensures different parts of local government are sharing information on risk to children and adults, in order to support them - in a meaningful and sustainable way - to be safe and well.

9. Change the public conversation with a campaign highlighting the voices of survivors and supporting and challenging perpetrators to question their own behaviour

We propose the government commissions a £5 million public information campaign to shed light on the epidemic of domestic abuse experiences. This would be led by child and adult survivors, and focus on the need for attitude and behaviour change amongst those who use, or who are at risk of using abuse, rather than on the victim/survivor to protect themselves. This should be a cross-platform effort delivered online and offline and using language and imagery that is inclusive of those who often get overlooked, for example disabled, BAME, LGBT+ and older victims and perpetrators. We have highlighted the experiences of these groups who often remain 'hidden' from support in our Spotlight series, and welcome more diverse stories in the public conversation

"I think positive recovery stories should be better highlighted and online imagery should be less 'victim-like'. Early intervention is key so let's not wait until first fist is thrown- everyone should be able to spot early signs and hopefully things can be stopped as soon as possible."

Survivor

10. Make the new Domestic Abuse Commissioner role fit for purpose, with independence, and a comprehensive approach to domestic abuse built in from the outset

We welcome the government's commitment to establish a new DA Commissioner. We would like the new Commissioner to:

- **Recognise and respond to the links between DA and other possible adverse experiences.** This should include other forms of violence against women and girls (such as forced marriage, FGM, sexual violence) and other forms of risk and disadvantage, such as exposure to other forms of criminality (e.g. CSE); mental ill-health and disability.
- **Have a remit that includes children.** This should cover children who experience domestic abuse at home, and young people in abusive relationships.
- **Oversee perpetrator provision** – both by statutory, voluntary and private sector providers, to ensure it meets national standards and that gaps in provision are identified.
- **Receive Joint Targeted Area Inspection reports from the Care Quality Commission, Ofsted, HMI Constabulary and HMI Probation about how well services are joining up together.** The Commissioner should be tasked with ensuring DA related findings are acted upon, starting with the recommendations made in the 2017 JTAI report, working closely with the relevant inspectorates.
- **Have lead responsibility for monitoring local commissioners' performance against the refreshed VAWG strategy, as well as the National Statement of Expectations.**
- **Attend the cross-Whitehall Directors Group on prevention of social harms.**

We welcome the government's commitment to work with the Domestic Abuse Commissioner, when appointed, to look at how learning from DHRs is being implemented both locally and nationally. SafeLives coordinates regular learning from DHRs in its 'National Scrutiny Panel' and stands ready to support the government and the Commissioner in this.

We have concerns about the proposals that the new commissioner will be accountable to the Secretary of State, requiring his/her approval for their strategic plan and staff appointments. The Commissioner needs to be independent of government so that they can exercise their role without fear or favour. We will be very interested to see promised proposals to safeguard the Commissioner's independence. We suggest this independence might be better protected by primary accountability to parliament, perhaps via a joint committee of the Women and Equalities and Home Affairs select committees. These committees should also be involved in recruiting the permanent role.