



By email: DomesticAbuseConsultation@justice.gsi.gov.uk
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Dear Rt Hon Sajid Javid and Rt Hon David Gauke

We write to respond to your consultation on the proposed Domestic Abuse Bill.

As a Rape Crisis Centre we offer a range of specialist support, advocacy, counselling and information to victims and survivors of rape, childhood sexual abuse and all other forms of sexual violence. The work of Rape Crisis Centres is highly specialised, trauma-informed and takes a gendered, needs-led and strengths-based approach that recognises sexual violence as both a cause and a consequence of gender inequality.

We are concerned by the narrow remit of this proposed Bill and the notable absence of sexual violence from the consultation and impact assessment. We endorse and support the position that was the foundation for the Wales National Strategy on Violence against Women, Domestic Abuse and Sexual Violence – 2016 - 2021 as part of the implementation of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015:

Domestic abuse and sexual violence stand together as gender related crimes as, statistically; the vast majority of victims are women and girls. However, in determining the best way to tackle these issues it is crucial to acknowledge not only the links between the different elements of the Violence Against Women, Domestic Abuse and Sexual Violence sector but also the differences that exist. Domestic abuse and sexual violence are not always mutually exclusive and may both be prevalent within a pattern of abuse which consists of multiple characteristics. There are certainly links which should be acknowledged. For example, there is an established link between domestic abuse and childhood sexual abuse as power and control forms the basis of both abuses despite their contrasting generational and gender perspectives. However, sexual violence has the potential to occur within a greater range of settings and situations.

Our key points:

1. The creation of a Domestic Abuse and Sexual Violence Bill which addresses the needs of victims/survivors of sexual violence

Sexual Violence is highly prevalent in our society. Victims and survivors who access Rape Crisis services have typically experienced myriad different forms of sexual violence and domestic abuse in their lives. It is unhelpful to segregate and compartmentalise separate forms of sexual violence that exist on the continuum, and it is important that this Bill pays attention to sexual violence not solely domestic abuse. Recognising the links between sexual and domestic violence demonstrates the need for an integrated response. This applies particularly in commissioning, local and national strategies, where sexual violence is consistently marginalised or ignored.

2. The provision of ring-fenced, long-term centralised government funding for Rape Crisis Centres that allows them to respond to demand on their services

Rape and all forms of sexual violence are not local issues; they are national issues that require a strategic national response. Only through the national Rape Support Fund have we seen investment in new Rape Crisis services, in areas where no provision existed. Local decision-making and commissioning is not adequately equipped or best placed to tackle systemic

inequality and abuse. We therefore recommend a two-pronged approach to funding, with the continuance of sufficient core funding being held at national level to ensure a base level of services in all areas, based on the evidence of incidence and prevalence. More localised commissioning would provide additional funds for service development in response to local need.

3. Improvements in local commissioning processes to ensure that independent specialist support is provided to victims/survivors

Devolving decisions about provision to local authorities has left victims and survivors with specific needs unable to access vital help. Commissioning cannot be left to local public sector commissioners in isolation. All commissioners need training to be able to carry out effective sexual violence strategic needs assessments as a requirement of any devolved funding and these assessments should be central to tendering processes so they can be shown to meet local need. Rape Crisis services should not solely be reliant on Police and Crime Commissioners for funding; there should be dedicated funding streams including health and social care, education, local authority etc.

4. Migrant women living in “hostile environment” must be included

It is extremely disappointing that women with insecure immigration status receive scant attention in the proposals, when if one were to ask women’s services up and down the country what the most urgent issues needing attention are, the needs of these women would be at the top of the list. Women with insecure immigration status, including but not limited to women who are here on spousal visas, victims of trafficking, and asylum seekers, are among the most desperate and the most vulnerable to further abuse because of their status and inability to access safety, but they commonly face treatment as ‘immigration offenders’ due to the “hostile environment” rather than victims of abuse.

5. The ratification and full implementation of the Istanbul Convention obligations

We recommend that the Bill should include measures to address:

1. The obligation to provide a statutory minimum of specialist sexual violence/abuse women’s support services to victim/survivors;
2. The obligation in particular to fund a 24-hour telephone helpline (the sexual violence helpline is the only one among the range of violence against women and girls helplines that is *not* funded by the UK government);
3. The obligation to undertake detailed, pan-Government disaggregated data collection in order to monitor compliance with the Convention.

6. That the £1 million funding allocation for a Domestic Abuse Commissioner’s office is instead diverted to frontline services

It is untenable at a point where frontline VAWG services are in such desperate need of resourcing that an office be created with such a significant sum of money attached, with no commitment to increasing frontline sexual violence support provision. It cannot be stressed enough that victims and survivors are currently being turned away from services or are on waiting lists and that any funding linked to this Bill should also be diverted to the frontline services that need it most. This should be a government priority. Domestic abuse does not occur in isolation outside of the continuum of sexual violence. Any future Commissioner post should reflect this reality and be a Domestic Abuse and Sexual Violence Commissioner. Any such role needs to have the power and influence to hold services and statutory agencies to account. Such a position needs to be held by an individual appropriately qualified and experienced enough to do so.



As a frontline service provider in the Violence Against Women and Girls sector we welcome the Government's recognition that more needs to be done to improve the support to victims/survivors and tackle the root causes of systemic gendered violence and abuse. We write hoping that this consultation does not become a missed opportunity to meaningfully respond to the sector's needs.

Yours sincerely,

Amy Roch

Director
Suffolk Rape Crisis