‘Everywoman Safe, Everywhere’, a Commission on Women’s Safety, chaired by Vera Baird QC, is a consultation established to investigate the impact of the Tory-led Government’s policies on women’s safety. This report - drawn from submissions and evidence gathering sessions around the country – is a summary of findings to date.

Policy in the Labour Party is made via Labour’s policy-making process, Partnership into Power (PiP). This report will go forward to PiP as a submission to the Crime, Justice, Citizenship and Equalities Policy Commission who will consider it during the next policy development cycle which will see the Party develop a programme on which Labour’s next Manifesto will be based.
Foreword

Last year I was told the story of a young mother turned away from a refuge whose services had been cut. When the council were slow to help, she sought shelter with her baby in Internet cafes, fearful of returning to a violent husband, but with nowhere safe to turn.

At first it seemed like an isolated incident. But the more we heard about towns closing specialist domestic violence courts, police officers forced to destroy rape suspects’ DNA, or CCTV switched off, the more worried we became that no one was looking at the cumulative impact of all these policies on women’s safety.

Labour has already uncovered strong evidence showing women are being hardest hit by the Government’s economic policies – losing twice as much as men from tax credit, pay, pension and benefit changes. Now we began to fear that women’s safety was also being disproportionately affected.

At the same time we also believed further positive action was needed, building on the measures Labour introduced in government, including new legislation to tackle violence against women and improve safety for all.

That’s why I asked Vera Baird, former Solicitor General with a strong record working to reduce violence against women, to chair a new Women’s Safety Commission. I am very grateful to Vera and her fellow commissioners Stella Creasy and Kate Green, for their work taking evidence from women and men across the country.

The response to the Commission in its first three months has been extremely strong, and its first report makes powerful points including:

- A 31% cut in funding for refuges and specialist advice is undermining action against domestic violence
- Taking 17,000 suspected rapists off the DNA database and removing specialist prosecutors will make it harder to convict rapists
- Chaotic changes to commissioning in the NHS, police and local councils, with no national guidance mean services for vulnerable women are at risk of neglect.
- Half a million street lights are being switched off with no assessment of the impact on women’s safety or fear of crime.
- And there is strong support for further legal changes including a new law on stalking.

Overall, it is clear that government policy is now undermining action to keep women safe. Whilst Labour has always said that services across the board need to reform and make savings, we’ve also made clear the Government is cutting too far too fast, and there now is growing evidence that services supporting women’s safety are facing disproportionate cuts. Meanwhile chaotic policy reforms are putting services at further risk.

Shockingly no assessment has been made by the Government of the cumulative impact of policy and funding changes, and no attempt has been made to ensure safeguards to keep women safe. Once again it appears that David Cameron has a blind spot when it comes to women’s lives.
That is why I believe the Women’s Safety Commission is right to call for change. Already Labour campaigns on some of the issues the Commission has raised have delivered results. Ministers have now accepted the Justice for Jane amendment on the right of appeal against bail, and are piloting Clare’s Law – both things we called for in the original November consultation. We have defeated the Government on cuts to legal aid in the House of Lords. And we are continuing to press for a new stalking law and will raise that in the Lords again in the weeks to come if progress is not made.

But urgent action is still needed. Most immediately Labour will be campaigning on the Commission’s central recommendation -- to call for an urgent and comprehensive government audit of women’s safety and services which tackle violence against women. We will be calling too for clearer standards and safeguards to protect women as the chaotic public service changes unfold at local level.

And the Commission will continue its work too – gathering more evidence, putting forward more ideas for the Labour Party, campaigners and the Government to consider and promoting women’s safety across the country. We hope more even more people will become involved in the coming months. Because the goal must remain, every woman safe, everywhere.

Rt Hon Yvette Cooper MP

Shadow Minister for Women and Equalities
8th March 2012
Executive Summary

Everywoman Safe Everywhere, Labour’s Commission on Women’s Safety was established in November 2011 in response to concerns that, not only were government policies disproportionately impacting upon women economically, but may be risking their safety too.

In the last three months the Commission has held 14 evidence gathering sessions in different towns and cities; has engaged with more than 100 organisations and experts, and received upwards of 160 submissions from women and men around the country on the status of services which safeguard the personal safety of women. We have also analysed up-to-date background literature.

A wide range and breadth of issues were discussed, but a number of consistent factors were repeatedly raised. In the course of these discussions, participants have raised many distinct and diverse concerns, from the provision of services for those who are victims of rape or domestic violence, to the impact of cuts in street lighting, station staffing and car parking charges on how safe women feel.

Alongside identifying specific decisions taken by the Government that put them at risk, women also spoke of longstanding inequalities and their frustration at a lack of progress in addressing these. In particular, the Commission heard repeatedly from women of all ages of the discomfort they feel about the way in which women are portrayed in modern culture, which many felt made them more vulnerable to harassment and violence, as well as causing them to feel restricted in their everyday lives.

This report seeks to capture these discussions and identify the increasing risks to the personal safety of women in Britain. It paints a compelling picture of the cumulative impact of changes to the law and public service provision which are undermining recent progress in keeping women safe in Britain, as well as a failure to deal with both new and old forms of inequality which scar the lives of too many in our society. Just as there is now overwhelming evidence that women have borne the brunt of the economic recession, so too it is clear that the services designed to keep them safe are now also under threat too. This document sets out the evidence the Commission has gathered in just the first three months, along with the growing signs of serious concerns across the country. But we are clear that more research, evidence and analysis is needed.

- Support services for women survivors of violence are facing funding challenges on an almost unprecedented scale. Local authorities have seen their budgets reduced by up to 27 per cent. Yet, services that tackle violence against women may be taking a proportionately bigger hit than other services, with cuts to their budgets totalling 31 per cent;

- 230 women were turned away from refuge accommodation on a typical day during this period of unprecedented economic challenge. The Commission uncovered worrying evidence of women being advised of how to stay safe whilst sleeping on the streets when space in refuge accommodation could not be found; of women with babies being placed in B&B accommodation on a rolling, daily basis; and of young women being placed in mixed sex hostel provision, rather than getting the support they need;
• Specialised providers of services are being hit particularly hard. IMKAAN has reported the closure of two specialist Black, Asian, Minority Ethnic and Refugee (BAMER) refuges in London; a specialist service for 16-18 year old women is reportedly facing closure; and disabled women’s groups report the increasingly severe shortage in the specialist services that meet their needs;

• Independent Domestic Violence Advisors (IDVAs) are receiving 10-120 per cent cuts, with some in areas like Portsmouth, Nottingham, Devon, E4t Berkshire, Blackburn and several London Boroughs experiencing even greater cuts. A recent poll of 8 IDVA services collectively supporting 13,180 clients and found that reductions in council grants left 2 IDVA services facing 100 per cent cuts, 3 with 50 per cent funding cuts, 3 with 40 per cent cuts and two with 25 per cent cuts;

• 23 Specialist Domestic Violence Courts (SCDVs) are also closing as part of the planned closure of 142 courts by the Ministry of Justice and evidence shows that SDVCs are quickly losing their effectiveness. This is despite the fact that, in 2005, while 59 per cent of all domestic violence cases recorded by the CPS led to convictions, 71 per cent of these tried in specialist courts led to successful outcomes. The Crown Prosecution Service (CPS) is also now subject to a national cut of 25 per cent (£118 million) between 2010/11 and 2014/15, with an estimated loss of 1,800 staff;

• The rapidly changing commissioning landscape is leading towards a path of chaos in the commissioning of services for women survivors of violence. Primary Care Trusts are being abolished in favour of new Clinical Commissioning Groups and new Police and Crime Commissioners will soon be responsible for services for victims. Yet national minimum standards in service provision are not in place, both expertise and specialism is being lost, and it is not yet clear which bodies will be responsible for commissioning services in the years to come, despite the imminent approach of commissioning changes;

• In addition to these reductions in their direct funding, other policy changes are causing further risk. For instance, both Supporting People funding and rent, usually paid through Housing Benefit, are a key sources of income for refuges. However, cuts to Supporting People are having an impact and there are real concerns that the Government will restrict the payment of the service element of Housing Benefit to refuges in the future, a move which has been described as ‘the final nail in the coffin’;

• Proposals to increase the number of women (aged up to 35) only entitled to the Single Accommodation Rate means that refuges may get ‘bed blocked’ through a shortage of shared accommodation to which women can move on to. This could make refuges less able to accommodate emergency applications and there are serious questions about compelling vulnerable women to share bathrooms and kitchens with strangers;

• Changes to the access requirements for legal aid are set to make it unlikely that women survivors of violence will get help in securing care of their children, maintenance or any of their property rights following separation. An Equality Impact Assessment has found that 361,200 women would lose their access to legal aid in a variety of areas under the Government’s original proposals. Further,
research suggests that 46 per cent of current users of domestic violence services would not be entitled to legal aid under the Government’s original proposals;

- The consultation also looked at Labour’s draft Personal Safety and Security Bill, there was a significant belief that some aspects of criminal law could be strengthened to better protect women and to punish the perpetrators of violence and abuse. Labour were pleased in recent weeks when one aspect of that Bill – the right of appeal against bail for perpetrators of domestic violence (Justice for Jane Clough campaign) - was accepted by the Government. But there is still significant scope to make progress on the criminalisation of stalking and Clare’s Law, amongst other aspects of criminal law;

- Reports indicate that half a million street lights have been switched off and up to 675 rail station ticket offices are under threat of closure. There is also a lack of awareness or analysis at the national level, of the scale and breadth of cuts to the infrastructure that women rely on for safety in local communities. Twice as many women as men are reporting feeling more unsafe as they walk alone in the dark, or make their journey to work, but there are few Equality Impact Assessments on decisions to cut police numbers and street lighting, increase parking charges or reduce investment in local transport infrastructure.

- The Government needs to do more to understand what prevents violence and harm to women, as well as addressing the needs of those who become victims. Women are disproportionately affected by changes to welfare provision, with cuts to child benefit, childcare tax credits and the proposed change to the universal credit reducing the income they control within their households. This in turn restricts their freedom - either through restricting the travel choices they have, the employment arrangements they can make, or their ability to leave an abusive relationship;

- The risks women face cannot be understood without reference to the broader context of contemporary society and the public portrayal and presence of women. Worryingly, girls now report experiencing sexual harassment in primary school playgrounds and throughout their pre-teen and early teen years. The sexualised and often negative depiction of women within popular culture creates pressure on girls and boys from an early age to conform to and value particular images of women;

- The absence of women from positions of influence across the media, business and public life limits the experience of those in leadership positions of the diversity of women’s lives and so also limits the ability to challenge the decisions which risk women’s safety or to raise concerns;

- The Commission therefore recommends the Government conducts, with some urgency, an audit of the services available to women victims of violence, to identify any deterioration in services and any gaps in provision, alongside a national audit of the reduction in street lighting provision and community safety infrastructure. This should include Equalities Impact Assessments (EIA) of changes, to determine their impact on women.
We also believe the Government must act to develop a comprehensive quality outcomes framework, with key national standards, to assist commissioners in maintaining services for women escaping violence, as new changes to commissioning processes bed-in.

The Commission has sought to draw together for the first time the different range of changes that have taken place in Britain over the course of the last two years under this Government, in order to understand how and why the safety of women is being compromised. The picture this report paints is one of a growing uncertainty about our ability to ensure every woman is safe, as cuts to services, restrictions to income and the persistence of inequalities in British society go unchallenged and may leave women at risk of experiencing harassment, fear and violence.

To tackle the problems this report recommends that the Government should, as matter of urgency, audit the consequences of these changes in service provision before it proceeds further.

That the Commission is the first to bring each of these different spheres together to look at the lives of women only serves as a reminder that, by contrast, this Government has not sought to proactively understand how or why the lives of women are under pressure from so many different directions. We know that there is much more work to do. The Commission will therefore continue to work in partnership with others, to consult on our recommendations, to gather more evidence in the months to come and to put forward those proposals we think the Government should adopt now. This work will feed into the Labour Party’s policy development process. Our next immediate task will be to look in detail at the changes that are underway in the commissioning process, calling for proposals on what new guidance should look like, in the absence of Government action. We will look in detail at other areas of concern, including the portrayal and presence of women in the media and in society as we progress too.

For Labour, recognising how to ensure the safety of all women is at the heart of a more progressive society. In the coming years it is our mission to ensure not only that these concerns are heard but that all women are given the opportunities they seek to be safe and succeed. The women who depend upon progressive governments to fight for them need and deserve nothing less.
Introduction

When Yvette Cooper asked me last November to Chair this Commission on Women’s Safety, I agreed because, like her, I had become concerned about how women’s safety services were faring under the Tory-led Government. I had seen an abandoned attempt to bring anonymity for rape defendants, plans to scrap the DNA database, which is a powerful weapon against serial rapists, and proposed cuts to legal aid that would see half of domestic violence survivors excluded from help. However the coalition had continued our funding for rape crisis centres, and, to some extent, also for the staff who have made Specialist Domestic Violence Courts so successful, so I went out with a concerned but open mind.

Our first evidence session shocked me. Twelve national women’s organisations, ranging from Mumsnet to Women’s Aid, came in the week before Christmas and painted a grim picture.

All the refuge providers told us that financial pressure had already forced cuts both to services like childcare and to bed spaces. 230 fleeing women on a typical day have nowhere to go. We heard of despair for the future through local commissioning in the hands of junior staff, with no national guidelines or criteria but price; that experienced Domestic Violence Co-ordinators are being lost, so local networks are too weak to respond holistically to violence, which is the best way. Groups who used to work together in communities are being forced to compete against each other and small specialists providers for BAMER or women with particular needs are already closing.

Mumsnet told us that their website was inundated when violence against women was raised. The Women’s Institute shared their report on the devastating effects of legal aid cuts.

We heard worries that this Government is turning the clock back for women, does not understand that financial dependence links to domestic violence and announces national strategies to be locally funded, then cuts local budgets. Worst of all, we heard that women were no longer confident that if they became victims of violence, there would be the support they needed to leave violence behind.

We went out to the regions and found a similar picture of cuts, despondency, anger and a sense of being ignored or disregarded under a new Government with wholly different priorities than these. Our reports sets out the worrying detail of how all of this is happening and makes recommendations for how it must be stopped.

I have campaigned against violence against women for many years and played a role in the significant advances made by the last Labour Government in tackling it. Like many women who came to talk to us, I thought the time had long passed when the need for these services could be called into question or their provision put into reverse. VAWG services surely by now should be a clear part of our mature welfare state, where women ought not to be unable to leave violent relationships for want of support, or to be trapped in sexual abuse. The Commission will continue its work; it will write to the Government to alert it to women’s fears and join with those women to work hard to rescue this position.

In this short first period of study, we regrettably have hardly touched on asylum and immigration, prostitution or trafficking, force marriage or FGM, nor have we had time to
look further than for one brief visit into the excellent work being done by the Welsh Government. We will continue our work with thanks to all who have given their valuable time and expertise to us so far.

**Vera Baird QC**
Chair of Everywoman Safe Everywhere
Chapter 1: Funding Concerns

We found growing evidence that economic and policy decisions, taken by Government, are beginning to reduce community safety and weaken action to tackle violence against women. The scale of cuts to police, councils, court and health budgets, the impact of the commissioning agenda, as well as changes to housing benefit, mean that refuges, specialist domestic violence courts, domestic and sexual abuse workers and longstanding community based women’s organisations are all being undermined, cut back or, in some cases, closed completely.

These services have been long campaigned for and it is essential that they remain as a strong part of a mature welfare state, where women ought not to be unable to leave violent relationships for want of support, or to be trapped in sexual abuse. Yet they are seriously under threat and the women’s organisations that run them are despondent about their future and the future of the women they serve. No monitoring or auditing of the cumulative impact of these changes is taking place, so that Government can take stock and determine whether it truly intends to sustain support for women’s safety, or whether it is content that it should continue to decline. It is urgent that such monitoring takes place.

All of this deterioration in women’s services is taking place even though the Coalition has continued some of Labour’s direct funding for rape crisis and other sexual violence services, and put some of that funding onto a 3 yearly basis. They have also continued funding some of the Independent Domestic Violence and Sexual Violence Advisers (IDVAs and ISVA, who befriend and support women survivors of violence and sexual abuse) and the Multi Agency Risk Assessment Conferences (MARACs, which manage the most high-risk cases in the community).

Concerns about current Direct Government Funding

The Ministry of Justice has allocated £3.3 million per year for the next 3 years, to what they term Rape Support Centres. This move has given greater security than previous annual funding to Rape Crisis Centres and has been universally welcomed.

The Labour Government introduced a series of measures to tackle violence against women and girls, which included IDVAs, ISVAs, MARACs and Specialist Domestic Violence Courts (SDVCs). Much of this funding came from central Government, with additional support from police authorities and local authorities, amongst other sources. The Coalition Government has agreed to continue central funding over the next four years for these services and has allocated £28 million to do so, alongside supporting national helplines.

However, many concerns were raised with us about this funding approach.

Firstly, applications are restricted to a maximum of £20,000 per IDVA and £15,000 per MARAC and there can be only one bid for each kind or post per local authority, irrespective of how many there currently are. ¹

Secondly, IDVA services in general, despite this funding, are receiving 10-20 per cent cuts with some in areas like Portsmouth, Nottingham, Devon, East Berkshire, Blackburn and several London Boroughs experiencing even greater cuts.²

Co-ordinated Action Against Domestic Abuse (CAADA) recently carried out a poll of 8 IDVA services collectively supporting 13,180 clients and found that reductions in council grants left 2 IDVA services facing 100 per cent cuts, 3 with 50 per cent funding cuts, 3 with 40 per cent cuts and two with 25 per cent cuts.³

Thirdly, IDVAs, ISVAs and MARACs are all part of the system supporting the formerly highly successful Specialist Domestic Violence Courts but these are now also under threat. 23 of those courts are to close and more broadly, cuts to police, CPS and court budgets mean that there is declining commitment nationwide to what is a very specialised court model, which requires specific ongoing training for all the criminal justice actors and co-ordinated input from them all. Although IDVAs ISVAs and MARACs have support functions too, they are deprived of most of their efficacy if the court system they are designed to serve is being allowed to fail.

Finally, the principle vision of the coalition Government’s strategy to end violence against women and girls is to: “prevent violence from happening by challenging the attitudes and behaviours which foster it, and intervening early where possible to prevent it.”⁴

However, limiting funding to IDVAs, ISVAs and MARACs captures only around the top 10 per cent of high risk domestic violence survivors. Although this small proportion has an undoubtedly powerful case for funding and was funded by the last Labour Government, the difference now is that the 27 per cent cuts to local authority funding is leaving wide gaps in the support services that used to be available to the remaining 90 per cent of victims. This raises questions about whether prevention really is at the heart of the Government’s violence against women and girls (VAWG). More importantly, it also makes clear that “spot funding” for a few services from national budgets will do little to compensate for huge centrally dictated local cuts to the rest of the violence against women infrastructure.

Safer Wales, as well as some organisations in the Midlands, expressed concerns that there should be a review of how domestic violence work is funded, because the needs of those who are suffering non-criminal coercive control, financial abuse, or a lower level of violence are not currently met. If funding is not channelled into lower level domestic violence, which is itself hugely debilitating but which often escalates, there is greater risk that women will be unable to seek help until it does, with the risk of injury or trauma in the meantime.

It seems the future of this central funding pot for VAWG services is, in any event, now being called into question. A recent Ministry of Justice consultation paper, ‘Getting it right for Victims and Witnesses,’⁵ proposes that a new commissioning framework for victims, led by Police and Crime Commissioners, be in place by 2014. Although the

² Towers and Walby, ibid
³ Towers and Walby ibid at Page 17
⁴ http://www.homeoffice.gov.uk/publications/crime/call-end-violence-women-girls/vawg-paper
document does state that funding for IDVAs, ISVAs and MARACs will continue to be in place until 2015, central funding for specialised domestic and sexual violence services of this nature are not guaranteed beyond this point, and funding for other services, such as Rape Support Centres runs out by 2014.

Cuts to the Third Sector

Supporting People is one of the most important sources of funding for the VAWG sector, with evidence suggesting that over half of VAWG service providers’ annual income comes from Local Authorities via Supporting People allocations, and three quarters of all refuge providers’ income comes from just two sources – Supporting People and rental income.6

However, both local authorities and Supporting People are subject to budget cuts and 73 per cent of service providers have been warned to expect a disproportionate cut to their own budgets.7

As the start of this Consultation process, we carried out a small survey to assess whether or not cuts to local authority budgets are having an impact on VAWG services at the local level, contacting women’s refuges the length and breadth of the country. Worryingly, every centre we spoke to had experienced cuts in local authority support in the past year, in many cases dramatically impacting the level of support they are able to provide to the victims of domestic violence. Some centres told us they were set to lose half their funding.

Describing the crisis in funding they are facing, staff working for domestic abuse organisations told us:

“*We have already had to make redundancies and we’ve had no reassurances that the funding situation will change. Service users will be the next victims of these cuts.*”

“*We only have funding to support children’s accommodation in the refuge until next March. What am I going to do with the kids come April? Turn them out onto the streets?*”

“I *don’t even know if this centre will be here next year. Imagine the women we could’ve helped.*”

“It’s *not just the cuts that we are facing here at the refuge. When women move on from our support, the services they depend on in the community and from the local authority are no longer really there.*”

The collaborative organisation, Voluntary Sector Cuts also carried out an exercise mapping out the extent of cuts to third sector women’s organisations providing VAGW services to survivors. Their database8 details substantial cuts to support services for victims of domestic violence, including:

8 http://voluntarysectorcuts.org.uk/about/ (as of 21st November 2011)
• the complete closure of Aylesbury Women’s Centre’s Domestic Violence Service;
• the forced reduction in the number of women who can access services at Croydon Rape Crisis Centre;
• the loss of 50 per cent of staff at a domestic violence and abuse centre in Devon;
• the possible redundancy of two Independent Sexual Violence Advocates at the Rape and Sexual Abuse Centre in Merseyside;
• the closure of GIPSIL’s Early Intervention Domestic Violence project in Leeds;
• the closure of WAVE’s Schools Domestic Abuse Awareness Scheme in Wigan;
• three redundancies at Rochdale Women’s Refuge.

Similar data collected by False Economy9 also revealed the widespread reduction in local authority support for women’s support services. Reporting on funding to 64 domestic violence and sexual abuse projects, False Economy identified significant cuts to these important services, with the following case studies, taken from their website, providing only a snapshot of the current funding crisis in support for women victims of violence.

1. Women’s Aid
   • An £11,511 cut in local authority support for Loughborough Women’s Aid in 2010/11 – a 39 per cent cut in total;
   • A 100 per cent cut in funding for a specialist ethnic minority support worker at Women’s Aid in Northamptonshire, worth £14,340 in 2011/12;
   • A 14 per cent cut – worth £4,375 – to Midland’s Women’s Aid;
   • A £9,125 or 23.3 per cent cut in local authority funding in 2011/12 for Newark Women’s Aid for the provision of safe accommodation and associated support services;
   • Nottinghamshire Women’s Aid, whose local authority-supported budget cuts totalled £6,910 in 2011/12;
   • A £79,837 or 20.1 per cent cut in local authority funding in 2011/12 for Bromley Women’s Aid for the provision of supported accommodation for women fleeing violence;
   • A £97,003, or 46.3 per cent cut in support for a range of projects for Blackburn with Darwen Women’s Aid, including anti-bullying work;
   • Following cuts in the Area Based Grants, Birmingham and Solihull Women’s Aid lost £67,152 in funding and had to decommission its early intervention service;
   • North East Lincolnshire Women’s Aid, which lost 88.8 per cent of its local authority funding – equivalent to £15,800;
   • Following cuts to Supporting People, Sheffield Women’s Aid lost £28,435 in funding for safe accommodation – a 10 per cent cut.

2. Rape Crisis
   • Nottingham Rape Crisis Centre lost 14.4 per cent of its local authority support in 2011/12;
   • Portsmouth Rape Crisis Centre suffered a 15 per cent cut in local authority support in 2011/12;
   • Sheffield Rape Crisis Centre lost 10 per cent of its local authority support in 2011/12.

Cumulatively, substantial reductions in national budgets are leading to cuts in local budgets and services to prevent and protect against VAWG. Date collected by False

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Economy and analysed by Towers and Walby suggests that 31 per cent of the funding to the domestic violence and sexual abuse sector from local authorities was cut between 2010/11 and 2011/12 – a reduction from £7.8 million to £5.4 million. Other information reported in Towers and Walby\textsuperscript{10} included:

- Cuts in service provision are expected to lead to increases in violence;
- Organisations with smaller budgets from local authorities had more substantial budget cuts than larger ones: among those with local authority funding of less than £20,000, the average cut was 70 per cent, as compared with 29 per cent for those receiving over £100,000 between 2010/11 and 2011/12 (Data from Freedom of Information Requests by False Economy);
- 230 women, just under 9 per cent of those seeking refuge, were turned away by Women’s Aid on a typical day in 2011, due to a lack of space (Data from a survey conducted by Women’s Aid);
- The number of Independent Domestic Violence Advisors (IDVAs) has been reduced: in 2011, among 8 major IDVA service providers supporting 13,180 clients, 2 faced cuts of 100 per cent, 3 cuts of 50 per cent, 3 of 40 per cent and 2 of 25 per cent (Date from a poll conducted by CAADA);
- IMKAAN, who run services for women and Black, Asian and Minority Ethnic groups report the closing of two of six specialist refuges and cuts to local authority funding for two more (Data from IMKAAN);
- Statutory provision, including those police and court services that involve specialised expertise, has also been reduced, following cuts. This includes cuts in the operating levels of Domestic Abuse Officers, a unit on female genital mutilation and domestic violence courts (Date from Home Office and Ministry for Justice).

**Examples from Evidence:**

Eaves reported that the demand for their services has increased from 366 referrals for advice and support in 2009/10, to 548 in 2010/11 – a 50 per cent rise on the previous year. However, it has been forced to cut its bed space by 72 per cent at the Poppy Project (from 54, to 15 beds) following the loss of 95 per cent of its funding when its grant was reallocated to a more generic service provider.

Other groups are telling us anecdotally that cuts to specialist, experienced, professional women’s organisations are leading to a reduction in salaries. We already have pay inequality between men and women and this move is forcing down women’s already low wages even further. These threats to pay further raise concerns about the ability of services to recruit experienced, qualified staff and may have an impact upon quality.

Some areas and organisations now have secure and stable funding and this has provided support for organisations that might otherwise have suffered greater damage from cuts.

\textsuperscript{10} Towers, Jude and Walby, Sylvia (2012) ‘Measuring the impact of cuts in public expenditure on the provision of services to prevent violence against women and girls. Northern Rock Foundation and Trust for London. 
http://www.nr-foundation.org.uk/resources/publications/domestic-abuse-research-reports/
“We got 3 years funding from the national central pot, matched by the local authority and by Health. It is mainstreamed which means 3 year funding and this is secure and exactly what we need.”

*Participant, West Midlands evidence gathering session*

**Funding: Key ways forward**

Women’s organisations have made clear that:

1. Funding for the provision of services for violence against women and girls is under severe strain;
2. The cumulative impact of funding cuts on the sector is difficult to gauge;
3. However, there is clear evidence that IDVA services are facing cuts, Specialist Domestic Violence Courts are being closed and the future of central Home Office funding for these services is increasingly uncertain;
4. With local authority budgets being hit by a 27 per cent cut, and funding from local authorities to the domestic and sexual violence sector taking a 31 per cent cut, it appears that services that protect women from violence are being hit disproportionately hard;
5. VAWG services at the local level are being cutback – from the closure of early intervention domestic violence projects in Leeds, to a 72 per cent cut in refuge bed space at the Poppy Project.

The Commission on Women’s Safety recommends:

1. That the Government conducts an urgent audit of the services available to women victims of violence, to identify any deterioration in services and any gaps in provision;
2. That the Government challenges poorer performing local authorities to match the provision of the best performing authorities on violence against women and girls.
Chapter 2: Commissioning

The Coalition has set out a commissioning agenda whereby services for a local each community should be commissioned according to local priorities with little centrally imposed direction, targets or national standards, whether it be on councils, police, health or other local agencies.

This rapidly changing commissioning landscape is leading towards a path of chaos in the commissioning of services for women survivors of violence. Primary Care Trusts are being abolished in favour of new Clinical Commissioning Groups and new Police and Crime Commissioners will soon be responsible for services for victims. Yet national minimum standards in service provision are not in place, both expertise and specialism is being lost, and it is not yet clear which bodies will be responsible for commissioning services in the years to come, despite the imminent approach of commissioning changes.

On the other hand the Coalition’s national “Call to End Violence Against Women and Girls” strategy recognises that there are over 1 million victims of domestic violence and 600,000 rapes a year and emphasises the need for a “focused and robust” approach.

It is difficult to see how that strategic approach can be transmitted to local commissioners to ensure that they buy in sufficient, good quality women’s services to tackle that violence, without some central direction or at least guidance and without the national standards to ensure that they provide the “focused and robust” approach which is certainly needed.

Our evidence raised four main issues of serious concern about how this agenda is already affecting women’s services across the country: They are:

• Services being commissioned without a national quality framework, leading to differing service standards in different local areas;
• An increasing pattern of large contracts for generic, gender-neutral services that do not adequately meet the needs of women escaping violence and risk the loss of local connections and specialist expertise;
• The drive for lowest unit cost, rather than the provision of quality services, and;
• A fear that commissioners lack an understanding that these services are tackling what the Coalition calls “gender based crime,” in that most victims are women and most women want women only services.

Undermining national standards

The localism agenda sees local bodies having more autonomy in determining the minimum level of support that survivors of violence can expect to receive, and setting differing priorities in a range of areas that are crucial to women’s safety, including community safety and housing.

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Unless central safeguards or a framework that recognises the disproportionate impact of violence on women are introduced alongside local commissioning, there is a danger that moving away from a national policy-making framework and towards more locally-set agendas, will not only limit the input of national experts with real expertise in VAWG services, but that cultural biases and a potentially weak understanding of the complexities of VAWG will lead to gaps in services and support for women survivors of violence at the local level.

Further, the Commission found concerns that moves away from national indicators to monitor progress on tackling violence against women and girls, coupled with a lack of minimum standards, could lead to a disparity and inconsistency in service provision in different localities.

Evidence has shown that even where local authorities have been encouraged to monitor their progress in tackling violence against women and girls, many fail to prioritise this agenda. When Labour were in Government, Local Area Agreements (LAAs) ensured local authorities were obliged to select up to 35 indicators to measure their performance on a range of key issues. Yet, out of the 152 LAAs that existed in England, only four partnerships chose an indicator to measure their performance on sexual violence, showing that, even when actively encouraged to monitor their progress on tackling violence against women and girls, many local authorities fail to do as much as they could.

Despite these concerns about a postcode lottery, the coalition Government is not seeking to learn the lessons of LAAs and strengthen the national monitoring framework, but has instead abolished the area based grants and weakened the effectiveness of crime and disorder reduction partnerships, effectively abolishing all national VAWG indicators. This lack of a consistent quality framework downgrades scrutiny of these services, which will be commissioned in a piecemeal way from authority to authority and will inevitably be of different standards.

**Lack of analysis of the impact on women**

“I worry that mixing services for domestic violence survivors with services for other users will mean the focus increasingly becomes about putting ‘bums on beds’, rather than delivering the package of support that these women need.”

*Women’s sector employee, London evidence gathering session*

Organisations that deliver VAWG services have long taken an approach to delivering services for survivors of violence that recognises the disproportionate impact of this issue on women. This approach recognises that not only are women more vulnerable to
intimate partner violence, but that a range of economic, social and cultural factors mean they are also more likely to be the primary carers of children, have less secure housing tenure, be more financially dependent on their partner and are more likely to be put at real physical risk in the immediate period after leaving a partner.

Specialist VAWG organisations therefore, often not only address immediate and pressing issues like emergency accommodation and support for women survivors, but can also provide the expert, long-term and holistic support needed to tackle the inter-related complexities of VAWG and the insight to re-empower the survivor.

However, evidence submitted to the Consultation revealed a concern that a lack of consideration of the particular and disproportionate impact of violence on women is combining to lead to a pattern of mixed, generic, gender-neutral services that do not always address the needs of the most vulnerable women and their safety.

Current commissioning and procurement processes do not recognise that there are existing prejudices, inequalities and discrimination in our society that require some basic but proactive and additional measures to ensure equality of access. 

Women’s sector employee, London evidence gathering session

For example a London evidence gathering session heard that a pre-qualifying questionnaire at the outset of the commissioning process is being used to eliminate tendering bids from organisations that do not deliver services for both women and men, despite the experience and expertise specialist VAWG organisations bring to the table.

Example from evidence:

At one London-based evidence gathering session, a leading national advice and advocacy organisation said anecdotal evidence, at least, suggested accommodation provided by some generic service providers was becoming increasingly insecure, with violent ex-partners more frequently able to track down their victims. In one case described, a generic service provider, with little experience of handling VAWG cases, had advertised a range of refuge jobs in local newspapers, publically listing the address of the refuge in question.

This was linked by our informants to what they see as a lack of understanding of the needs of the sector more generally by commissioners.

“They are commissioning us and their attitude has changed to being determined to make us do what they want, to show they are in charge, at a time when they too are feeling insecure but we have been delivering services in the community for 30 years working with that very local authority, who know that we can suggest improvements on what is proposed.”

Some Commissioners have been cut and replaced with people who, until recently were in other jobs so there are concerns about expertise and continuity. In Manchester we were told that relatively new Commissioners don’t seem to understand how funding works, in the sector.
"Commissioners don’t hold stakeholder consultations to find out what services are needed. We would enter into a dialogue with them. They don’t have the knowledge and they don’t look for it."

We found a similar message in Coventry where we were told: “there are many contracts to fill but Commissioners don’t know much about this sector.”

In March 2011 a report to the Office of Fair Trading by Price Waterhouse Cooper\textsuperscript{12} described key criticisms of commissioning, of which one was that people involved in procurement do not always possess the necessary skills and procurement teams used staff who were too junior.

Evidence submitted to the Consultation suggests that current standard commissioning and procurement practice means that there is rarely any VAWG expert involvement at the commissioning level amongst those who draft procurement specifications, which would help to build a gendered-understanding of the barriers and discrimination surrounding VAWG, and allow for the necessary additional support to be included in procurement processes that would ensure that all service users can equally access and benefit from services.

Further, there were concerns that a lack of expertise could give rise to the inference of myths and stereotypes about domestic and sexual violence, such as that domestic violence is caused by alcohol abuse, and that funding could therefore be diverted away from escape routes for vulnerable women and towards alcohol reduction interventions.

PWC also found that procurers sometimes did not have sufficient understanding of the impact of their own actions on the relevant markets, which is reflected in our evidence that the current Commissioning approach is forcing groups who have previously worked together in the public benefit to compete against each other and hence to withdraw from participation in the co-ordinated response which is best for women.

PWC also found evidence of an excessively prescriptive interpretation of commissioning rules and our evidence certainly showed a prevalent misunderstanding of rules in the Equality Act which led to the rigid commissioning of gender neutral services when, in fact, the gender equality duty requires that different services be commissioned in order to meet the needs of different communities.

This interpretation rebounded in particular against black, Asian, minority ethnic and refugee (BAMER) charities and is capable of being fundamentally damaging to the interests of the communities they represent. Women will not move away from violence if there is no culturally sympathetic place of resort.

PWC also criticised too much “bundling” of many different services into one contract, which may suit the largest suppliers but again is bad for BAMER and other small suppliers, who are unable to deliver the scale and mix of service required. Many refuge charities told us of housing associations which had or could outbid them through economies of scale but were also unable to offer support services for a range of vulnerable people, such as former homeless or ex-prisoners, as well as VAWG victims.

\textsuperscript{12} http://www.oft.gov.uk/shared_oft/reports/comp_policy/commissioning+competition.pdf
Generic supply such as this undermines the women only services that are a necessity for women fleeing violence and it also breaks the link with the local community.

Finally the report confirmed the fourth worry we found, namely that:

“The present state of the economy and the fiscal position is having a major impact throughout government, with an increased focus on price across a range of different markets. In some cases this is accompanied by a very short term focus.”

Example from Evidence:

At one evidence session, a women’s organisation told us the a London local authority had put out a bid for VAWG services, with 85 per cent of the tender would be based on cost and just 1 per cent based on the quality of the services provided.

The immediate victims of this trend towards gender-neutral and generic support services for victims of violence are the highly skilled and community – based specialist services that support women who are particularly vulnerable to violence.

“If commissioning processes don’t recognise discrimination or inequality, they simply replicate it.”

Women’s sector employee, London evidence gathering session

For example, IMKAAN has reported the closure of two of its specialist Black, Asian, Minority Ethnic and Refugee (BAMER) refuge services. Of the remaining four specialist centres, two have faced considerable funding cuts\(^{13}\).

In the West Midlands, a community organisation which grew up from the households in one particular area to support women who were suffering violence and were afraid of the cultural implications of taking action, has expanded to supply BAMER refuge and outreach services across two local authorities. But its CEO told us that she was fearful for the future because of the negative attitude of commissioners and their refusal to learn how the VAWG sector works.

“I have repeatedly to explain, even to some police, that the specialism here goes all the way up”.

Despite the Government’s apparent focus on violence against younger women, a frequent theme to emerge in the evidence was a concern about the future of specialist provision supporting young women between the ages of 16 and 18, and those without children, who are often categorised as low priority. Social services have a statutory duty to protect girl victims of violence up until the age of 16, at which point this obligation becomes discretionary. However, refuges are only permitted to house women above the

age of 18, meaning there is a real danger that girls aged 16 and 17 could fall through the gap.

Despite this, we are hearing worrying reports that the only specialist service available for 16-18 year olds women in London is on the brink of closure and that all new referrals are being sent on to adult, mixed-sex hostels, which are inappropriate for their needs.

A further concern of particular significance, given the apparent trend towards the provision of services by larger, generic organisations is particularly the emergence of provision by religious or evangelical organisations, who have bid against specialist VAWG organisations for tenders and won. The major concern is that some women who are particularly vulnerable to violence, including those engaged in prostitution, victims of honour-based violence or cultural practices, trafficked women, substance abusers or those who have transgressed religious norms, including those who may be seeking abortions, may be deterred from seeking help and support if they have no alternative but to access services provided by religious organisations.

Moreover, the relative absence of disabled women from the current violence against women and girls strategy was particularly troubling to some of the organisations we spoke to. Whilst the mention of accessible refuges was welcomed in the strategy, it was largely felt that VAWG services were still inaccessible to the majority of disabled women (and that refuge accommodation was particularly inaccessible to deaf women), that there were few accessible spaces for disabled women to give evidence about their abuse, and that, whilst the majority of those accused of a crime had access to specialist interpreters, disabled women reporting abuse were often denied this support. This is despite the fact that Disability Action told us around 70 per cent of learning-disabled women report being the victims of sexual abuse, compared to around 22 per cent of non-disabled women. Disabled women’s organisations urged future strategies to properly explore those inequalities that make disabled women particularly vulnerable to violence in the first place.

We also heard from a highly respected academic in Manchester that women with learning disabilities have extreme difficulty in accessing VAWG services.

Some organisations in the disabled women’s sector were also concerned about government moves towards narrowing the definition of domestic violence in the Legal Aid Bill. They instead argued that the definition of intimate partner abuse should be further expanded to include those carers who perform intimate tasks. However, the biggest concern raised was that a lack of attention to disabled women in the VAWG strategy was leading to a social service-led response to those disabled women who reported abuse, with the situation being viewed as the abuse of a vulnerable adult, instead of domestic violence. On the other hand, the initial reaction to violence or abuse of a non-disabled woman is often to instigate a criminal response. This leaves many disabled women without equality of access to VAWG professionals and services, including MARACs and IDVAs.

A final concern raised about the provision of services for disabled women fleeing violence, was the uncertainty about how ‘portable’ care packages will be in the future for those women seeking refuge in a new local authority area.

Concerns were also raised about the absence of trafficking and prostitution from the Government’s VAWG strategy, and low levels of asylum support, which forces some of
the most vulnerable women into exploitative situations in order to survive. The influx of many visitors for major sporting events in the next few years, including the Olympic and Commonwealth Games, are expected to lead to an increase the exploitation of the most vulnerable women and is an area that needs more thorough consideration. It is to our regret that we were not able in the time so far allocated to pursue these special and important areas of violence against women and we hope to be able to return to them in due course.

**Chaos in commissioning**

Whereas a co-ordinated community approach to tackling violence and abuse is undoubtedly what most services would like to offer, there is now confusion in the commissioning arena that has left many public and third sector services in disarray, has made the immediate future unclear and has pitted former partners in this sector against each other in the face of future unknown commissioning demands.

The chaos stretches to schools, for example, where lessons currently attempt to raise awareness of issues around the problem of domestic violence, making it clear that domestic violence is unacceptable and focusing on the prevention of violent relationships. However, schools are becoming increasingly autonomous and able to set their own curricula, giving many the choice to opt-out of this aspect of the national framework.

Primary Care Trusts, some of which currently fund counselling work with victims and survivors of violence are being abolished. They will be replaced by new Clinical Commissioning Groups, which will see groups of GPs being responsible for the design and operation of local health services and it is not clear how far these new GP consortia will continue to fund domestic abuse work or even recognise it as their responsibility.

New Police and Crime Commissioners (PCCs) will soon similarly also be able to set the priorities and budgets for police forces across the country. Recent consultations suggest that more of the VAWG budget will be devolved to PCCs, leaving a key question unanswered: Will Health and Wellbeing Panels or Police and Crime Commissioners take the lead in commissioning VAWG services in the future and will any national standards be given to either?

We spoke to the St Mary’s Sexual Assault Referral Centre in Manchester, who told us they were being asked to divide the services they provide into two categories: those which are therapeutic and those which are forensic. They fear this is because the health sector want the police to pay for forensic work and the police want the health sector to pay for therapeutic work, and, not surprisingly, they worried about what might slip through the middle.

Police and Crime Commissioners will be elected in November 2012. A recent Ministry of Justice consultation paper, ‘Getting it right for Victims and Witnesses’[^14^], proposes that a new commissioning framework for victims, led by Police and Crime Commissioners, be in place by 2014. Although the document does state that funding for IDVAs, ISVAs and MARACs will continue to be put in place by central government until 2015, central funding for specialised domestic and sexual violence services are not guaranteed.

[^14^](http://www.justice.gov.uk/downloads/consultations/getting-it-right-for-victims-and-witnesses.pdf)
beyond this point, and funding for other services, such as Rape Support Centres runs out by 2014.

“We propose that a new commissioning framework be implemented in full by 2014. To manage the transition to the new model, and ensure minimal disruption to service provision, we propose to transfer responsibility to commissioners by 2013. While Home Office funding for central specialised domestic and sexual violence services (i.e. Independent Domestic Violence Advisers, Independent Sexual Violence Advisers and Multi Agency Risk Assessment Conference coordinators and national helplines) will continue until March 2015, we will expect PCCs to consider the needs of domestic and sexual violence victims when developing their victims strategies from 2013 onwards to ensure they are as comprehensive as possible.”

Rape Crisis Centres from all over the North East who attended our evidence gathering in Durham had particular concerns about this. Firstly they were concerned that they had not been told that the Coalition’s adoption of sustainable three year funding for rape support services was a one-off commitment.

**Example from Evidence:**

The Government has awarded nearly £8.5 million of new grants over three years to 65 Rape Support Centres across the country, ensuring that they have a guaranteed stream of income until 2014. This move to target resources at rape victims by putting Rape Support Centres on a sustainable footing is to be welcomed.

However, specialist sexual violence organisations are concerned about a recent Ministry of Justice consultation document, which makes clear that a new local commissioning framework managed by Police and Crime Commissioners (PCCs) will be fully implemented by 2014, so that continuation of core funding for Rape Support Centres may well be at the discretion of individual local PCCs. Many PCCs may have little experience or understanding of the needs of rape survivors and, as such, may not prioritise support services for rape victims over more ‘populist’ issues, especially if funding for VAWG is not protected.

Secondly, there was a concern that Sexual Assault Referral Centres (SARCs) may be perceived by Police and Crime Commissioners to be the more important service for survivors of sexual violence, since they are more explicitly linked with criminal justice, deal with fewer historic complaints and work in partnership with police for purposes of medical examination and the taking and preservation of forensic evidence.

However, it was felt in some of our sessions that sustaining the services provided by both Rape Crisis Centres and Sexual Assault Referral Centres (SARCs) are important to providing holistic service to the full-range of VAWG survivors.
This shake-up in Commissioning is happening at the same time as many third sector organisations are telling us that anecdotal evidence is pointing to the loss or merger of many domestic violence co-ordinator posts at the local level. This leaves no single individual or body with responsibility for ensuring there are no gaps in service provision and support for women victims of violence whilst these new changes bed-in.

Local Authority Domestic Violence Coordinators could potentially play an important role in helping to identify gaps in provision throughout the transition process. However, this shake-up in local commissioning is coinciding with a declining membership of the Local Authority Domestic Violence Coordinators Network. According to data from Standing Together, reported by Towers and Walby, between 2010 and 2011, the number of members of the Local Authority Domestic Violence Coordinators Network has fallen by 30 (from 109, to 79). 26 of these are no longer in post and 4 were not given the budget to renew their membership.\(^\text{15}\)

The coalition Government’s drive to transfer decision making from central administration to local areas also extends to funding streams, such as the Social Fund.

Since the 1980s, the Social Fund has been providing crisis loans to women feeling violence who do not have enough money to meet immediate short-term needs, to help them avoid damage or serious risk to their or their children’s health and safety. However, the delivery of this requirement to provide assistance will, in the future, be devolved to Local Authorities.

The coalition Government suggests that Local Authorities will be able to incorporate new crisis loan assessments into existing systems, such as social service departments\(^\text{16}\). Yet, with VAWG organisations repeatedly reporting the strain on local social service budgets in the current financial climate, unless it becomes clear that the budget for the new local welfare assistance is ring-fenced, access to crisis loans will be a real worry in the future. It is also unclear if the Fund is to be administered by local authorities, how women who flee their own local authority to take refuge in a neighbouring area will be affected?

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Localism and Commissioning: Recommendations

The evidence gathered has made clear that:

1. The rapidly changing commissioning landscape is leading towards a path of chaos in the commissioning of services for women survivors of violence. Primary Care Trusts are being abolished in favour of new Clinical Commissioning Groups and new Police and Crime Commissioners will soon be responsible for services for victims;
2. More must be done to ensure that Commissioners have a gendered understanding of violence against women, inequality and discrimination, perhaps led by a lead VAWG Commissioner in every local authority, otherwise, the intention of the government’s strategy will not be realised;
3. Bodies that commission VAWG services need properly to monitor outcomes and review and refine practice accordingly;
4. Tenders should include minimum quality standards, based on best practice built up over years of experience and expertise;
5. An equalities framework must be integrated into commissioning processes, to ensure the needs of specific communities can be identified and met.

The Commission on Women’s Safety recommends:

1. The development of a comprehensive quality outcomes framework for those who commission VAWG services;
2. That consideration be given to a new statutory standard with a national rapporteur for VAWG, to ensure that a national quality outcomes framework is applied at every level;
3. That the VAWG sector is brought into constructive dialogue throughout procurement processes, to ensure commissioners are properly informed;
4. Training for all commissioners in VAWG best practice;

Example from Evidence:

Increasingly localised commissioning is having a real impact on those organisations providing services on a regional or cross-boundary basis. Whilst the recent core funding for Rape Crisis Centres is to be warmly welcomed, the four Rape Crisis Centres in London grapple with commissioning processes in 32 different London boroughs to secure project funding for the region – taking a real bureaucratic and time-consuming toll on an already-stretched organisation.
Chapter 3: The Police, Courts and Legal Aid

Cuts to policing which are already impacting on specialist officers such as those who support victims of VAWG and the removal of legal aid from family law, with only a very narrowly drawn exception for domestic violence cases, are likely to leave survivors of violence struggling to participate in the justice system. There are worrying further trends, including reports that, not only are Specialist Domestic Violence Courts (SDVCs) reducing in number, but they are also ceasing to be as functional or effective as they were.

Following the consultation on Labour’s draft Personal Safety and Security Bill, there is also a significant belief that some aspects of criminal law could be strengthened to better protect women and to punish the perpetrators of violence and abuse. We were pleased in recent weeks when one aspect of that Bill – the right of appeal against bail for perpetrators of domestic violence - was accepted by the Government. But there is still significant scope to make progress on the criminalisation of stalking, amongst other aspects of criminal law, including the piloting of Clare’s Law.

Police

The coalition is making cuts of 20 per cent to police budgets – more than the 12 per cent that Her Majesty’s Inspectorate of Constabulary said could be made without affecting services on the frontline. That is £2 billion in cuts, with the steepest reductions in the first two years.

HMIC have confirmed this means 16,000 police officers will be lost in total and by March this year, there will be 2,500 fewer on the frontline and 1,800 fewer Police Community Support Officers (PCSOs).

We have heard evidence that the specialist domestic abuse officers essential for the functioning of Specialist Domestic Violence Courts and the broader wellbeing of women survivors of violence have been the subject of such cuts. For instance we were told in Coventry that six of eight such police had been lost.

There were also concerns at a number of the centres where we took evidence about changes in police practice in regard to violence against women, which was generally said to have greatly improved over preceding years, but was now regressing.

In Durham, we were told that in Cleveland police, officers move on “all the time” and so there is neither continuity of attention to cases nor consistency of response.

“Things got better but have now gone back. There is poor follow up to complaints. We have had what looked like attempted murders that ended up being dealt with as common assaults.”

Participant, Durham evidence gathering session
Cautions

In London, organisations were worried that pressures of time and funding on police were resulting in the sometimes inappropriate use of police cautions for domestic violence perpetrators.

Whilst we were told that ACPO guidance makes clear that cautions are to be used sparingly, AVA (Against Violence and Abuse) told us that they are used by the Metropolitan Police in 52% of domestic violence crimes.

They are not always inappropriate but the concern turns on the perception of a caution as the economical option because police do not need CPS sign off for a simple caution.

Evidence submitted to the Everywoman Safe Everywhere Commission

However, there has been publicity to suggest that police powers to charge low-middle level offences without reference to the CPS will increase.

In Birmingham we were told that cautions were similarly on the increase because domestic violence specialist prosecutors are being cut. Police expect to get more charging powers and have made clear that they will administer more domestic violence cautions. Women’s organisations were concerned that an inappropriate caution may leave a women exposed to backlash from a perpetrator whom she has reported but whose violence has been taken insufficiently seriously to deter further misconduct.

In the West Midlands generally, there was a further concern that breaches of domestic violence injunctions - a criminal offence since the Domestic Violence Crime and Victims Act 2004 - are not being enforced by police. Further, the number of police referrals to VAWG services has gone down as they have in parts of the north east, which participants felt was due to a loss of local specialist police expertise.

For example, we were told that between September 2009 and 2010, 267 people were referred by police to Ashram Housing, a refuge with a special interest in BAMER women, whilst between September and January 2012 only 25 people were referred to them by West Midlands police. However, self referrals to Ashram Housing have gone up over and above that shortfall, giving rise to a concern that domestic violence may itself be on the increase, even as police involvement appears to decline.

In Coventry and the West Midlands we were told that police are becoming “more offender- orientated” – and less victim-focused. Anecdotally, we were told that Public Protection Units (PPUs) in particular seem to be being cut and a commissioner who came to one of our meetings in the south west made clear that any cuts or pressure on PPUs would be likely to result in the remaining officers concentrating on safeguarding issues, rather than on tackling violence against women.

By way of further example, we were told that police had been ready to be involved in taking out non-molestation injunctions over many years in Birmingham and that they would take an active role in getting cases to court, saving woman from shoulderin the whole burden alone. However, they are now far less engaged in this process.
Some groups in London are particularly concerned about the lack of police and prosecution implementation of Section 14 Policing and Crime Act in relation to paying for sex with someone who has been subject to exploitative conduct. Prostitution is currently missing entirely from both the Government’s Strategy and Action Plan and the Commission strongly recommends that it be added and policy and provision either be made or, if it exists, be made public, well in advance of the anticipated rise in sexual exploitation during and related to the Olympics.

**Offending**

We did not include women offenders as a specific category in our work in the short time we had to produce this provisional report, but we believe their current situation would merit investigation. Whilst the commission coincided with the publication of the Corston Funders Review and saw a re-dedication by that group to work with women offenders, once again we encountered local and national policies capable of undermining or weakening good intent. For instance, Platform 51 (formerly YWCA), who we were pleased to have at several of our events, told us:

“Increasing numbers of women we deal with are reoffending because there are no jobs and a large number of women, in particular, single mothers have had to relocate through lack of resources in to neighbourhoods where they are insecure and exposed."

**Legislative changes**

Following the consultation on Labour’s draft Personal Safety and Security Bill, evidence submitted to the Commission indicates a significant belief that some aspects of criminal law could be strengthened to better protect women and to punish the perpetrators of violence and abuse. We were pleased in recent weeks when one aspect of that Bill – the right of appeal against bail for perpetrators of domestic violence - was accepted by the Government. But there is still significant scope to make progress on the criminalisation of stalking, amongst other aspects of criminal law, including the piloting of Clare’s Law.

Evidence submitted to the Independent Parliamentary Inquiry into Stalking Law Reform emphasises the need for changes to the Protection of Harassment Act. According to the latest British Crime Survey (2010/11), 18.1 per cent of women had been a victim of stalking once or more since the age of 16. Stalking can lead to even more serious crimes. In more than 40 per cent of domestic homicides, stalking behaviours were present and went unchecked. Currently people can be arrested and charged under the Protection From Harassment Act 1997, but although this was a step forward, it does not specifically deal with stalking.

Despite the details of the prevalence of stalking in the British Crime Survey, the number of persons found guilty under Section 2, the offence of harassment, was 4,365 during 2009. However, the number receiving a custodial sentence was 565, which represents 13 per cent of those found guilty. Under Section 4 of the Act, putting a person in fear of violence, in 2009, 786 persons were found guilty, with 170 being given a custodial sentence.

The inquiry concluded, based in the experience of victims and frontline practitioners, that the Protection from Harassment Act 1997 needed significant revision. The panel
found that victims had a profound lack of confidence in the criminal justice system; very few prosecutions under the Act resulted in a custodial sentence, and little, if any, treatment was available for perpetrators. The panel also concluded that training for criminal justice professionals was inadequate; that risk assessments in respect of victims was not routinely carried out and that psychiatric assessments in respect of perpetrators was largely absent.

A stalking law, creating a specific offence of stalking, would provide clarity for the police, for the victims and for the courts.

**Legal aid**

Literally everywhere we went, we heard great anger and a major sense of betrayal at the Government’s original proposals to remove legal aid from social welfare cases and, in particular, its complete removal from private family law cases, with a very narrow exemption which will apply to few victims of domestic violence. These proposals are totally at odds with the commitments made in the Coalition’s Strategic Vision\(^\text{17}\) to protect women experiencing violence and ensure their access to justice. The Home Office must intervene to prevent the removal of legal aid for family law cases in all cases where there is domestic violence.

The Ministry of Justice’s original proposals in the Legal Aid, Sentencing and Punishment of Offenders Bill (LAPSO) would remove access to justice from many thousands of women who have experienced and are at risk of gendered domestic and sexual violence.

This anger is not confined to the violence against women sector; the Women’s Institute has done an excellent report\(^\text{18}\) pointing out the widespread injustice that will befall their ordinary membership if the provisions go through Parliament that weaken legal aid for survivors of violence and we have received scores of submissions to our website from individual women.

We focussed in particular on the removal of family law legal aid, which amounts to the total removal of all legal help and representation, with only the narrowest of possible exemptions. We have benefitted from the work of CAADA (www.caada.org.uk), Domestic Violence Intervention Project (www.dvip.org), Eaves Housing (www.eaves4women.org.uk), Kalayaan (www.kalayaan.org.uk), Refuge (www.refuge.org.uk), Respect (www.respect.uk.net), Southall Black Sisters (www.southallblackssisters.org.uk), Welsh Women’s Aid (www.welshwomensaid.org.uk), and Women’s Aid Federation of England (www.womensaid.org.uk) through their contributions and to the research assembled by Rights of Women (www.rightofwomen.org.uk) which we use extensively here.\(^\text{19}\)

The Government has stated that legal aid will be retained for private family law matters where domestic violence is an issue. However, we are concerned that, under their original proposals, that will not be the case for at least two clear reasons.


\(^\text{19}\) http://www.rightofwomen.org.uk/pdfs/Policy/ROW_briefing_HOL_committee.pdf
Definition of domestic violence

The originally proposed definition of domestic violence in the Legal Aid, Sentencing and Punishment of Offenders (LASPO) Bill is narrower than the definition used by the police, the courts, that which guides statutory agency practice and governs access to Government services. Importantly, the original definition used in the Bill failed to explicitly refer to financial abuse and sexual violence, which are almost invariably present and sometimes are the dominant characteristics. The ACPO definition is clear, tested in law and now so familiar that it is taken as a given for all of these purposes. It is quite inexplicable that a different definition was adopted for this most important of piece of legislation and, whilst the Government has conceded ground an inch at a time on this issue, it must go further if there is to be justice for the women who may otherwise be excluded. This is why the Commission proposed a draft amendment on the definition of domestic violence in our Personal Safety Bill and we will continue to campaign on this front.

Domestic violence gateway criteria

Under the original proposals in the LASPO Bill, victims of domestic violence will be expected to provide “objective evidence” that they have suffered such violence in order to qualify for legal aid. In the Commons, Under Secretary of State Jonathan Djanogly answered Labour’s calls to widen the range of evidence that can establish domestic violence and trigger legal aid by saying that his rules were intended to separate “genuine victims” from “unfounded allegations.”

The Government proposed that family legal aid will only be allowed where domestic violence is demonstrated by the existence of an injunction or a criminal conviction within 12 months of the application, or if the victim is subject to a multi-agency risk assessment conference (MARAC) or where violence has been found as fact in the family courts. This is despite the fact that 79% of the professionals who work on violence against women surveyed by Rights of Women in 2011 said that the women they work with do not routinely report to the police.20 Similarly, Women’s Aid Federation of England’s Annual Survey in 2010 found that just 19% of women in refuge had been referred to a MARAC.21

Further, the findings of fact in family law will cease to be an option for demonstrating that domestic violence has occurred, if legal aid is removed in family law cases unless there is a finding of domestic violence in the family courts - a negative circular argument.

However, unless a survivor of violence can prove the existence of domestic violence using the proposed narrow categories above, she will not be eligible for legal aid. For instance, a victim may have been repeatedly to her doctor, suffering from assault injuries or visited A & E in a similar situation, with doctors and nurses who may be prepared to give evidence. Yet, Mr Djanogly, the relevant Minister said of medical evidence:

“Although they may witness injuries, it may be difficult for them to determine how they occurred.”

20 http://www.rightofwomen.org.uk/pdfs/Policy/ROW_briefing_HOL_committee.pdf
21 Rights of women ibid
Nor would there be any purpose served by collecting evidence from a neighbour who may have heard blows, or sheltered a victim from the perpetrator. Even more extraordinarily, Government proposals excluded evidence from police officers who may have attended and witnessed violence and even arrested and charged the perpetrator. Even if a perpetrator agreed to attend a specialist programme for domestic violence, or to give an undertaking not to assault her, neither will be accepted as evidence of domestic violence under Government proposals.

Victims may go to a refuge with their children, all of them upset and saying that their mother has been attacked. But neither the testimony of the receiving organisation, often with 30 years experience of dealing with domestic violence victims, nor the presence of the victim in their accommodation would help her obtain legal aid under original proposals.

Hence an applicant may have many diverse strands of evidence of domestic violence, yet still would not have qualified for legal aid under what the Government asserted would be an exemption to protect precisely such victims. Rights of Women and Welsh Women’s Aid have together produced research which shows that 46% of current users of domestic violence services - those who are clear victims of domestic violence for all other purposes of public funding and resource provision - will not be entitled to legal aid under the terms of the original Bill.

It could not be clearer that, if the Government does wish to protect women who have suffered from domestic violence, the evidential criteria must be wide. There can be no objection to making injunctions. MARACs and convictions are passports to legal aid, but since they do not represent the routes which both long-term experience and Rights Of Women’s recent research\(^\text{22}\) shows are the characteristic routes taken by women in violent situation, the evidential base must reflect this needs to be widened. There must be additional categories of evidence, including all of those exemplified above, which do not automatically passport an applicant but can be evaluated, on a case by case basis.

The range of evidence that the Government has said will be accepted will not be set out on the face of the Bill but will be introduced later through secondary legislation.\(^\text{23}\) Women’s organisations wherever we visited, were fully satisfied, not only that the criteria should be widened as set out above, but that the criteria must be evident on the face of the Bill, so that they are clear and transparent for women and their advisers and so that they will be fully debated in Parliament.

The Commission feels that any evidence, which would satisfy a diligent decision maker that domestic violence is present, even if it comes only from the complainant, ought to be admitted for that purpose, since it may be compelling in itself. However we agree that typical potential sources of corroborating evidence ought to be listed on the face of the Bill.

The Minister has made clear that legal aid will be retained for injunction applications\(^\text{24}\) and in the absence of broader evidential criteria on which to base an application for family law legal aid, it seems inevitable that domestic violence victims will seek to qualify for the domestic violence exemption by applying for injunctions. They will be likely to use precisely the kinds of evidence categorised above in order to do so and if that

\(^{22}\) [http://www.rightofwomen.org.uk/pdfs/Policy/Evidencing_dv_the_facts.pdf](http://www.rightofwomen.org.uk/pdfs/Policy/Evidencing_dv_the_facts.pdf)

\(^{23}\) [http://www.rightofwomen.org.uk/pdfs/Policy/Evidencing_dv_the_facts.pdf](http://www.rightofwomen.org.uk/pdfs/Policy/Evidencing_dv_the_facts.pdf)

\(^{24}\) [http://www.publications.parliament.uk/pa/cm201212/cmhansrd/cm120124/halltext/120124h0002.htm](http://www.publications.parliament.uk/pa/cm201212/cmhansrd/cm120124/halltext/120124h0002.htm)
evidence is found sufficient by the court, what will have taken place, at public cost, is what can be best described as a very expensive rubber stamp procedure.

**Time Limit on qualifying criteria**

The Government also proposed to apply a twelve month time limit to each of the current evidential criteria, so that even if a woman has had an in junction, a conviction or referral to a MARAC, she cannot use it to qualify for legal aid if it expired more than 12 months ago. Again, this fails to reflect reality and, in particular, the ongoing risk that perpetrators, who typically dominate women through abuse over long periods of time, can continue to pose, notwithstanding intervals of safety.

Specifically, Rights of Women report that their family law advice line often receives calls from women who have been separated and safe from an abusing ex-partner for some time, only to be placed at risk once more when he initiates child contact proceedings. The use of private family law proceedings to get back in contact with a woman who has been safe for some time is well known to many of the organisations we spoke to, who expressed serious concern that if this ploy succeeds, after longer than a year, the woman will be unrepresented when dealing with it.

**Legal aid for alleged perpetrators in domestic violence cases**

The Government’s LASPO Bill also proposed the removal of legal aid for alleged perpetrators in private family law cases, so that those who cannot or would not pay for a lawyer to represent them would be entitled to cross examine their victim in person. That would amount to something close to state sanctioned further abuse. There is a provision in the criminal system for a lawyer to be appointed by the court for the discrete task of cross examining the victim in a sexual abuse case and similar provision must be made here.

“Abusers often harass their victims further by using their children as a bargaining tool, for example insisting on their rights to see the children even when this will involve contact with the victims, and I think that there needs to be at the very least an understanding that access to children cannot be granted while a case is ongoing.”

*Victim Support volunteer, evidence submitted via the Everywoman Safe Everywhere Website*

Whilst legal aid would be retained for mediation under the Bill, there was no provision for cases where mediation is unsuitable or unsuccessful. So it would be possible to fail the domestic violence gateway criteria, yet have the case deemed unsuitable for mediation, because of domestic violence or imbalance of power between the parties, for example. Women with such a finding will still have no legal aid and would have to represent themselves.

The obvious danger from all of this is that if women cannot get family law help when they leave violent partners, they may not leave. They and their children may continue to

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25 (see: Bristol Women's Aid, *Making Contact Worse 2001*)
26 Rights of women ibid
suffer. It is still the case that 2 women a week are killed by domestic violence. This narrow approach will not ensure that only “genuine victims” get help. It is inevitably going to ensure that many “genuine victims” who need help do not get it.

Coventry Law Centre also have great concerns about the loss of legal aid for social welfare law.

They told us that the telephone gateway, which is to be the route to legal advice through the Legal Services Commission, will have too small a residual clientele to be serviced locally and so it will be a regional or national helpline, remote from service providers on the ground in the locality. Coventry Council funds advice services and intends to continue to do so but will not be able to increase its provision to make up for the loss of legal aid.

Specialist Domestic Violence Courts

"Our court-based IDVAs feel that they work in a vacuum and this reinforces the sense that the Government is not serious about this issue but has given cash handouts into a void". 

*Participant, West Midlands Evidence Gathering Session, speaking about SDVCs*

The Specialist Domestic Violence Courts (SDVCs) were an innovation, put forward in the 2003 Labour document “Safety and Justice”, piloted in two centres; successfully evaluated, and, by 2010, operational and highly successful in many parts of the country.

They are a multi-agency process in response to domestic violence. Police, prosecutors, court staff, the probation service and specialist support services for victims (principally IDVAs), all work in partnership and the magistrates who sit in these courts have received additional training. The agencies work together to identify, track and risk assess domestic violence cases, support victims of domestic violence and share information better, so that more offenders are brought to justice.

There has been a noticeable improvement in the conviction rate for domestic violence offences where the specialist courts are used. In 2005, while 59 percent of all domestic violence cases recorded by the CPS led to convictions, 71 percent of cases tried in specialist courts had successful outcomes. The principal reason for this appeared to be an increase in guilty pleas, whilst the rate of victim withdrawal also reduced considerably.  

*Engendering Justice*, the report of the Fawcett Commission on Women and Criminal Justice heard in 2009:

“The use of SDVCs has increased access to justice for an enormous number of women who now have more confidence in the court process.”

27 http://www.dewar4research.org/docs/saj.pdf
It is clear that there ought to be an SDVC in every area but, in May 2011, Ministry of Justice Minister Jonathan Djanogly said in a Commons Written Answer that the Coalition had

“No plans to extend the network of SDVCs.”

We have already referred to cuts being made to IDVAs (Independent Domestic Violence Advisors) who befriend and support victims of violence and they are critical to the success of the Specialist Courts. But IDVAs, in turn depend upon the co-ordinated response from all the criminal justice and other agencies, which underpin the system.

The Resource Manual for SDVCs lists 11 components which have to be present at a Specialist Court to make it work. They include protocols amongst the participating partners; Multi Agency Risk Assessment Conferences, which risk assess and plan safeguarding of the complainant and her family; accurate identification of cases by police and CPS; frontline police officers trained on the ACPO guidance for investigating domestic violence; dedicated prosecutors; specially trained magistrates; legal advisors; either a fast-tracking of domestic violence cases, or a clustering-together of cases on a designated day each week or each month; and partnership working outside of the CJS, including Primary Care Trusts, mental health services, drugs and alcohol services and housing.

However, we heard evidence at a number of centres that all of these formerly enthusiastic participants were now under such significant financial and staffing pressures that many had reduced their involvement with the SDVCs. It is clear that, if the police cannot afford an officer in place who is trained to identify cases as domestic abuse, if the CPS have fewer specially trained lawyers still in post, if court staff do not know that these cases should be listed separately from others and there is no IDVA, or only one who is over-stretched, then this highly successful system will fracture. That is what we found to be happening.

For instance, the Crown Prosecution Service (who were considered by our informants to be very committed to the SDVC system) are nonetheless subject nationally to a 25 per cent budget cut (£118 million) between 2010/11 and 2014/15 with an estimated loss of 1,800 staff. Police are subject to a 20 per cent national funding cut (£1bn) in the same period with an estimated loss of 16,000 officers.

We also heard some evidence about the loss of ISVAs, who fulfil the IDVA role in cases where there has been sex abuse. Coventry Rape and Sexual Abuse Centre reported the loss of one of two ISVAs, with funding for a second only secured until 2012.

In the West Midlands, organisations, whose IDVAs are at the heart of the Specialist Court process, told us that few courts are now able to offer more than a few of the 11 integral components. For instance, cases are not listed separately on an allocated day, but are spread across the ordinary courts’ timetable. This weakens protection for vulnerable witnesses, who need separate waiting arrangements and carries the risk of untrained

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30 http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm110510/text/110510w0001.htm#11051076001416
33 Towers and Walby Feb 2010 ibid
benches dealing with domestic violence, in the interstices of their other cases. In other words, as in many sections of the women’s sector, there are serious risks that specialism is being lost.

In particular, there are reported to be few applications for Special Measures being made to the courts, to secure the best evidence from complainants, by allowing such arrangements as giving evidence from behind a screen or across a TV link. If applications are made, they are generally made at the last minute and the practicalities and implementation can then be difficult. However, importantly, the complainant will not have known whether she will be able to have Special Measures in order to give her evidence, a factor which might influence her decision whether she can sustain the prosecution. This shortcoming was clearly described to us as stemming from the loss of trained domestic violence court prosecutors.

23 Special Domestic Violence Courts are being closed as part of the planned closure of 142 courts by the Ministry of Justice and there are concerns about the alternative arrangements announced by the Government. We were told, for example, that an SDVC in Bristol had closed at the end of March and that even the courts which were moved to another courthouse within an existing SDVC system suffered significant loss of personal working relationships.

We heard, in the Midlands, North East and the South West that the Local Criminal Justice Board sub-committees, whose task was the strategic co-ordination of these courts, had also grown weaker for similar reasons and that the relevant people in the criminal justice agencies were not now in post or had taken over several other roles under pressure of the cuts and could not attend meetings.

There were doubts that training was being supplied to new participants - a particular worry since the police and CPS were in what was described as ‘a state of constant flux due to re-organisation and internal pressures.’ In the recent past, joint-training of IDVAs and the CPS, as well as the training of police by IDVAs, had been the norm, but we encountered doubts that training of either of those criminal justice agencies is being renewed.

There are particular concerns for the (relatively few) courts that are moving to court areas where there has not been an SDVC before, in particular in the light of what is happening elsewhere. Experience may be lost and the characteristics that have made these courts highly accessible and successful may be dispersed under the pressures of merger into a different framework.

“There is little strategic co-ordination and no ongoing scrutiny; the local framework of accountability and partnership has been lost.”

Participant, West Midlands Evidence Gathering Session, speaking about SCDVs

In Northumbria, we were told that cuts to the SDVC mean there is low attendance at oversight meetings on operational issues. The numbers of cases coming through the specialist court have fallen, presumably for want of sufficient trained people to identify them.

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34 http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm110510/text/110510w0001.htm#11051076001416
The SDVC in Durham was a pilot and it worked very well for a number of years but there is no rolling training programme and so we were told that the court is losing staff expertise. IDVAs trained the magistrates and separately the CPS, but the numbers of IDVAs are down and the CPS have been centralised in an office in Darlington, away from the court.

Respondents in London were very concerned about the SDVC in Newham, which was described colloquially as “dropping to pieces.” It was reported it too was not compliant with the 11 components of a successful SDVC and there was concern about the future of the West London court, one of the earliest specialist domestic violence courts.

We cannot say that this depressing picture of the Specialist Courts is universal after only 3 months of inquiry, during which we made nine regional visits. However it is clear that, welcome as four year Government funding of IDVAs and MARACs is, if local cuts to partnership agencies mean that the hitherto highly successful SDVC infrastructure is allowed to corrode, then IDVAs alone will be insufficient to protect abused women and sustain them through the stress of bringing prosecutions. As several of the agencies we met summed it up - after a period of progress, justice looks likely once again to start failing women.

Recommendations:

Evidence submitted has made clear that:

1. Cuts to the police budget will result in fewer police officers and evidence is suggesting that this is impacting upon the provision of specialist domestic abuse officers;
2. The Government’s original legal aid proposals disproportionately impact upon women who are already vulnerable and 46 per cent of current users of domestic violence services would not qualify for support under these rules;
3. Special Domestic Violence Courts (SDVCs) that have been successful in the past now seem to be weakening in effectiveness;
4. The Crown Prosecution Service (CPS) is facing a 25 per cent budget cut nationally and 23 SDVCs are closing as part of the planned 142 courts by the Ministry of Justice.

The Commission on Women’s Safety recommends:

1. That the Government adopts the full standard ACPO definition of domestic violence for legal aid and we were pleased to see recent progress in that direction during House of Lords debate;
2. That the Government abandons plans to narrow the evidential criteria and timeframe, so that all women who, in fact, suffer from domestic violence, will be able to apply for legal aid;
3. That the Government abandons plans to abolish early legal help for social welfare cases, so that assistance can be given to stop problems escalating;
4. That the Government makes special provision for lawyer availability, to prevent the cross examination of an alleged domestic violence perpetrator of his victim;
5. That the Government takes action to make stalking a criminal offence and to establish pilot schemes for Clare’s Law.
Chapter 4: Community Safety

Labour has made clear that we believe cuts are going too far, too fast and councils are being forced to slash services without the resources to be able to address the consequences. We are concerned there is a disproportionate impact on services affecting women and women’s safety and also that the cumulative impact of these changes are going largely unnoticed and unmonitored by the Government. Previous chapters have identified how this has impacted on provision of direct services for women who have been victims of violence. The Commission has also uncovered evidence of how other policy may be undermining the capacity of women to stay safe on Britain’s streets. In particular, increasing parking costs, reductions in street lighting, unstaffed stations and threats to other safety measures, such as CCTV, have all been raised as significant concerns at evidence gathering sessions across the country.

Travel safety

A significant number of respondents to the consultation raised concerns about cuts to travel budgets and services and the corresponding impact on that could have on women’s perceptions of safety. A particular concern was the McNulty report, commissioned by the Secretary of State for Transport, which recommends the closure of 675 ticket offices in train stations, leaving many completely unstaffed. Respondents to the Commission illustrated how perceptions of the safety of travel interchanges influence the choices women make. For example, at one evidence gathering session in Coventry, local women raised concerns about lights being out at Coventry train station; that there were few, if any, station staff at work at night: the poorly lit car park; and concerns about a threat to the future of CCTV cameras in the area, which many felt were ‘their last line of defence’ in the preservation of personal safety.

Affordability of public transport is also a key issue for many women, especially as women are more likely to be on a low income than men. Yet, women in London told us that the cost of travelling by public transport has escalated in recent years, with a single bus ticket increasing in price by 50 per cent in the capital in the last four years. Women also told us that their use of public transport was further constrained by safety fears, especially after dark, and in London, there are concerns that staff presence on the underground has reduced, despite a pledge by the London Mayor to make public

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36 From 90p in 2008, to £1.35 in 2012
transport safer at night, especially for women.\textsuperscript{38} Statistics for the financial year to date also show that robbery is on the rise on the London bus network.\textsuperscript{39}

Other women were concerned that, as local authorities struggled to balance budgets in the face of cuts to central support, they were looking to other sources of income, causing on-street parking costs to go beyond the reach of many. At an evidence gathering session in Manchester, participants discussed the example of Westminster Council, who were forced into a high profile u-turn on plans to introduce on street parking charges in the evenings and weekend. It was clear to the Commission why this was a concern: women across the country told us that they often preferred to park on the street, rather than in multi-story car parks, which were perceived to have dark corners and stairwells, but that increases in on-street parking charges were restricting their ability to make the choices that lead them to feel safer.

It is not just women drivers who have expressed their fears about the implications of these decisions on their safety. Research by USDAW\textsuperscript{40} has confirmed that many people have significant concerns about their journey to work. Crucially, the report shows women are twice as likely to feel unsafe on their journeys to work as men and that this may, in part, be due to women’s different working patterns. The majority of part-time workers are women and part-time workers are more likely to travel to work in the early mornings or late at night when concerns about personal safety are heightened. Further, research in London has found that women are more likely to walk and use the bus than men, and are less likely to use rail, the underground or cars.\textsuperscript{41} Other findings from the USDAW survey included:

- More than half of all women express concern about walking across a dark car park, compared to less than a third of men;
- Women are twice as likely as men to feel at risk driving alone at night or travelling by bus or train when dark;
- Over half of all women feel anxious about their personal safety when walking in the dark.

\textbf{“The worst time is in the winter and early Saturday and Sunday mornings, when there aren’t too many people about. I have occasionally worked till 11.15pm and walking through town at that time is very uncomfortable.”}

\textit{USDAW, ‘What happens on your journey to work? Women’s journeys survey results’}

Finally it is worth noting the concern raised by the Suzy Lamplugh Trust at an evidence gathering session regarding those who were lone workers, including community nurses and social workers, and who often have to travel in the community on their own. They therefore rely on health and safety regulations, such as buddy systems, where two people work together as a team to stay safe when out doing home visits. However, representatives from the Trust expressed a worry that in the current environment of cuts and deregulation, health and safety is depicted as red tape and protections like buddy systems are seen as barriers to efficiency and growth and could fall victim to the Government’s red tape ‘bonfire.’

\textsuperscript{38} Mayor of London, Gender Equality Scheme 2010-11. May 2010
\textsuperscript{39} http://www.tfl.gov.uk/corporate/about-tfl/19360.aspx
\textsuperscript{40} USDAW, ‘What happens on your journey to work? Women’s journeys survey results’
\textsuperscript{41} Mayor of London, Gender Equality Scheme 2010-2011, May 2010.
Street Lighting

The Commission also looked at the impact cuts to street lighting are having on crime and fear of crime for women. As USDAW have found, it is often women who feel particularly vulnerable at night and rely on well-lit streets. Yet, in a worrying development for women’s perceptions of safety, a survey conducted by the Labour Party in November 2011 revealed that over half of local authorities who responded were in the process of reducing their street lighting.

“Due to cutbacks by the Government, some councils have turned street lights off. This is a real danger for women who work at night. I’m an Avon lady, so I’m concerned about my colleagues, many of whom deliver at night.

Sharon, evidence submitted via Everywoman Safe Everywhere website

Local Government & Communities Secretary of State Eric Pickles has said the move to reduce local expenditure through cutting street lighting is a “sensible decision.”

However, the Police Federation state:

“If an area is well-lit then the level of crime is likely to decrease. The cuts could well mean that back streets and outer areas become a more fertile area for criminals to become more active. The lighter an area is, the safer it is for public safety, pedestrians and indeed, motorists.”

As USDAW have reported, women feel more anxious about their personal safety when walking in the dark. Reductions in street lighting therefore have a disproportionately unsettling impact on women and their perceptions of safety in the community. These fears are likely to be compounded by their reliance on different modes of transport because - as the Suzy Lamplugh Trust report - women are less likely to have access to cars.

The scale of the switch off of street lighting in Britain is difficult to accurately identify as no national record of these changes is available. Worryingly, however, a recent report by the Daily Mail in February 2012 found that councils are being forced to switch off half a million street lights in a drive to save money. This research identified that a majority of country councils in England and Wales are switching lights off on residential and rural roads between midnight and dawn, or dimming them after midnight, a great increase in the last two years.

Similar surveys have also reported on these trends. In November 2011, the Telegraph found that of the 133 local authorities that responded, 98 said they were scaling back street lighting, or were looking into doing so. A further survey undertaken by BBC

Newsnight late last year also claimed that of 75 councils it spoke to in England and Wales, 32 said they would turn some lights off, nine are dimming lights and 14 considering street light cutbacks.46

“\textit{It feels like a curfew has been imposed....If I am visiting friends for the evening... I find myself leaving early to get home before the lights go out.}”
\textbf{Evidence submitted via Everywoman Safe Everywhere website}

The following 10 case-studies give a flavour of the dilemma faced by local authorities in lighting their highways the length and breadth of England and Wales as they are forced to respond to the Government’s cuts.

1. Shire County Council
This shire county council plans to switch off 1,600 of its 28,000 street lights, although other reports suggest that up to 11 per cent of street lights could be removed and lamps will be dimmed by up to 40 per cent at night.

2. Shire County Council
It has been reported that this shire county council has plans to commence “part lighting for up to 60,000 of its 89,000 lamps. Almost a third of the town and parish councils in the area have serious reservations about this plan.

3. Shire County Council
Last winter, residents in parts of this shire county council complained that their street lighting went off by 7pm, and said they noted an increase in burglaries after the switch off. The county council blamed technical problems for the early blackouts. However, some lights still only remain lit until midnight. Speaking to the media, a local resident said there was still local opposition to the scheme. “When the lights go out, it is pitch black. You can’t see past your own doorstep. There has definitely been an increase in crime.”

4. Urban Local Authority
This local authority, which is responsible for 92,000 street lights, is reported to be planning to remove 150 street lights by 2013, as well as moving to the partial switching off of 3,200 traffic route street lights and 4,750 residential street lights in the coming years.

5. Shire County Council
This county council has said it has turned off 18,000 of its approximately 220,000 street lights.

6. Shire County Council
3,300 streets in parts of one town, as well as in rural parts of the county, are being be converted to “part-night lighting”, meaning their lights will go off from midnight until

\footnote{46 \url{http://news.bbc.co.uk/1/hi/programmes/newsnight/9173729.stm}}
5am. In addition, more than 5,000 "dimmable" lights will be installed on main traffic routes, which will give off a third less light from 8pm until 5am.

7. Shire County Council
In February of this year this county council took the decision to turn off half the county’s 66,000 street lights.

8. Unitary Authority
This unitary authority is due to pilot a 12 month scheme incorporating 280 lights, which will see lamps turned off from 12 midnight until 5.30am. Following the pilot, the council plan to roll out the scheme more widely in the area.

9. Shire County Council
Reports suggest this county council plans to convert about 20 per cent of the 48,000 street lights it manages to part-night operation, with reduced lighting between midnight and 5.30am.

10. Urban Local Authority
This local authority council is installing 14,000 lights that can be dimmed by up to 75 per cent at night.

These ten case studies alone amount to the removal, dimming or partial switch-off of over 150,000 street lights – an average of around 15,000 in each council area.

“Cuts to street lighting – imposed by Suffolk Country Council - are happening here in Ipswich. Female friends who live in these areas tell me [and I can confirm from having looked at a few] that it is quite scary. If you don’t have a car, can’t afford taxis and are used to walking around your own town in safety, it does make quite a difference having this “curfew” imposed.”

Netta, evidence submitted via Everywoman Safe Everywhere website

Safety in the evening economy

Finally, the Commission uncovered evidence of the risks to women out in Britain’s streets in the evening. Testimony was given in London by younger women about the everyday harassment they experience walking around the city and the concerns they have for their safety when enjoying a night out.

Some young people – particularly young women - were concerned that there were few ‘safe’ spaces for younger people to get to know each other and to socialise. Younger women who gave evidence to the commission told us that socialising at home with friends wasn’t usually an option due to overcrowding or sometimes due to violence at home. Some argued that ‘hanging around on the street is sometimes better, when there are problems at home.’

However, many of these younger women also felt that hanging around on the streets made them more vulnerable to inappropriate behaviour and attention from men, particularly from men who have been drinking, and reported frequent incidents of street harassment.

Street harassment continues to be a problem that is not taken seriously... it is not a ‘compliment’ - it is harassment and intimidation. I have the right to walk down the street without being followed or verbally abused....”

Rebecca, evidence submitted via Everywoman Safe Everywhere website
For other young women, the lack of a safe space to socialise led them to conduct a large proportion of their social life through social network mediums like Facebook. However, they also told the Commission that this left them vulnerable to other dangers, including unwanted attention from older men and cyber bullying from their peers. In response to this, it was suggested that the increasing numbers of empty shops on high streets in communities across the country should be harnessed to create social cafes – safe spaces for young women to come together and interact with other young people in an environment that is controlled, free from alcohol and safe from street harassment.

A further concern amongst young women is their safety when out in the evening economy, and particularly unwanted attention from men who have been drinking in pubs and nightclubs, and the threat of unlicensed taxis. Councillors in Lambeth explained how they put together data from a number of partners to identify how the Clapham area was a focus for violence against women and sexual harassment. In response to these concerns, they implemented a range of effective measures to reduce harm to women visiting the area in evenings. However, many young women who visited this area also reported the problems they faced in nightclubs and the lack of action from door supervisors to these concerns.

This evidence highlighted that much more needs to be done to ensure women are able to enjoy the evening economy without fear of intimidation, harassment or violence. A number of further different factors were identified, including unlicensed taxis, who can generate a false sense of the trust associated with licensed cab drivers or may simply seem to be the best way for a woman to get home. It was also suggested there was a need to address the qualifications of many within the security industry and to increase awareness of the problems of intimidation, harassment and violence. In particular, it was suggested that local authorities could do more to address these concerns by setting tough security industry standards as a condition of licensing – including having women bar and security staff – as well as the regulation of taxi providers to help to combat the problem of unlicensed taxis.

At first glance, many of the issues raised in this chapter may appear to be gender neutral. Yet whether the diminished provision of street-lighting, cost of parking or reduction in station staff at transport interchanges, the consequences of these changes will affect women across Britain in many ways because of the different ways they lead their lives.

The evidence to the Commission highlights how these changes have been implemented without an assessment of their cumulative impact on local communities, let alone without an understanding of the way in which women’s lives will particularly be affected. As these changes come into effect there are good grounds to believe women will increasingly feel unsafe and so less able to move freely around, or else will worry they are putting their own personal safety at risk. This has significance for their working lives, social lives and quality of life. It shows how keeping Britain’s women safe on our streets requires recognising the diverse lives they lead and why changes in services will shape the choices they can make, as well as their experience day and night out and about. On the evidence taken by the Commission, concern for the impact of these changes on women appears to be missing and is causing at the very least, worry amongst women, and at worst, danger. Either way, it is Britain’s women who are being asked to pay the price.
Community Safety: Key ways forward

It is clear that:

1. Perceptions of insecurity in the community often disproportionately impact women and that women are twice as likely to feel unsafe on their journey to work as men;
2. The cuts to street lighting, though happening on an unprecedented scale, are going largely unmonitored at the national level and reports suggest that half a million street lights have already been switched off across Britain;
3. Women are also concerned about rising parking charges, as local authorities look to find other sources of income, as well as cuts to transport infrastructure, such as staff and CCTV at train stations.

The Women’s Safety Commission recommends:

1. That the Government conducts an urgent national audit into the reduction in both the number of lamps and hours of street lighting provision, including initiating an Equalities Impact Assessment (EIA) of the changes;
2. An urgent national audit of the provision and cost of public parking spaces, including an Equalities Impact Assessment (EIA);
3. The consideration of further moves towards the professionalisation of the security industry, including encouraging the recruitment of women entrants and making new industry standards a condition of licensing.
Chapter 5: The Impact of Housing and Welfare Reform

Refuges are reliant on rental income and local authority funding to provide support for women fleeing violence, and with many women survivors needing housing support during their escape from violence, issues around housing and welfare reform were frequently raised with the Commission during the consultation period.

There was also some reference to Sanctuary Schemes, which are an attempt to avoid the need for a victim to leave home through funding a contractor to fit safety and security equipment into a part of the house in order to give a “sanctuary” from attack.

However, we were told in the West Midlands that cost pressures have led local authorities to cut the specifications to contractors, so that new locks are usually all that can be provided, compared to earlier years when a range of sophisticated protective equipment could be fitted where necessary. They included reinforcing doors and door frames; getting window locks, bars, and grills installed; installing alarms, CCTV and security lighting; improving fire safety measures; and having a reinforced and lockable safe room in the house, from which the police can be called.

Having been alerted to that issue, we asked in other areas, where it was similarly related that these schemes are now less well-resourced and, in some cases, less fit for their purpose.

The alternative to a woman being kept safe by such a scheme, since the inference is of real, if intermittent, danger from violence, is likely to be re-housing her and her children in a location where the perpetrator cannot find them. If as a result either of her rejecting poor sanctuary provision or perhaps because it inadequately protects them, they have to be re-housed, the small savings on equipment will be negated, the policy will end up costing more and a family may have been traumatised unnecessarily.

Although Sanctuary Schemes are not appropriate in many cases, we strongly recommend that, where a risk assessment shows it may offer protection, that cost-cutting in every way is a false economy.

Homelessness and Women’s Safety

The Homelessness Monitor: Tracking the Impacts of Policy and Economic Change in England, undertaken by Herriot-Watt University and the University of York, for the charity Crisis warned on 8th September 2011 that after years of stable or falling levels of homelessness, 2010 marked the turning point when homelessness in all its forms started to rise again.

Figures released that day by DCLG show that the number of homeless households owed an accommodation duty by their local authority (“acceptances”) is up by 17% on the same quarter last year, to 11,820. This figure derives from 25,890 applications, itself a rise of 14%.

Professor Suzanne Fitzpatrick, of Herriot-Watt University, who led the research, said:
International evidence indicates that strong welfare and housing systems are vital in mitigating the impact of difficult economic circumstances on people vulnerable to homelessness. So the Government’s reforms in combination with the pressures of the economic downturn seem certain to increase all forms of homelessness, from rough sleepers on our streets to homeless people hidden out of sight.”

The research evidences how the Coalition’s reforms, particularly a range of cuts to housing benefit and changes to housing policy, will weaken protection that has until now usually broken the link between unemployment, poverty and homelessness. They are also restricting access to the private rented sector for low income households and have halved investment in building new social housing stock. Their shift away from national minimum standards and policy frameworks in favour of the local determination of priorities is, according to Professor Fitzpatrick, unlikely to benefit marginalised groups such as single homeless people.

Whilst this is an example of the removal of national minimum standards which will impact upon a wide range of vulnerable people, including women made homeless by the need to flee violence, we refer to the lack of such standards across a range of services, in this report, as crucially undermining women’s provision across the piece.

The Homeless Monitor report concludes that the next two years will be a crucial time period over which ‘lagged’ impacts of the recession start to materialise, together with some of the effects of welfare and housing reform.

In the single homeless population, women make up 30 per cent of clients of homelessness services. Interviews with homeless women conducted by Crisis showed that over 20% became homeless to escape violence from someone they knew, with the majority of these (70%) fleeing violence from a partner. The number of homeless applications due to the violent break-up of a relationship has increased between 2009/10 and 2010/11: violent relationship breakdown with a partner was accepted as the cause of unintentional homelessness in 5,620 cases in 2009/10 and 5,930 cases in 2010/11. Domestic violence is a leading cause of homelessness for women, who are the heads of the majority of homeless families.

“Turned away at the door”

Crisis research found that the majority of homeless women have negative experiences of approaching local authorities, with many seeing themselves as ‘turned away at the door’ or deterred by front-line staff from making a homelessness application. Of those women who did make a homelessness application, less than one third were awarded priority need status. It is not surprising therefore that over a third of homeless women did not approach their local authority for help or could not remember doing so.


48 http://www.crisis.org.uk/pages/homeless-diff-groups.html#1

49 http://www.crisis.org.uk/pages/homeless-diff-groups.html#3

50 Domestic Violence Needs Assessment. Eleri Butler &ors for Brighton and Hove Community Safety Partnership

51 http://www.crisis.org.uk/pages/homeless-diff-groups.html#4
Women rough sleepers

According to homelessness agencies, 11% of rough sleepers in London are women but this is likely to be an underestimate. Rough sleeping is extremely dangerous for homeless women - many have been physically attacked, verbally abused and sexually assaulted. Women respond to these dangers by making efforts to ‘remain invisible’, choosing places to sleep which are hidden from view and disguising their homeless status in some way.

Not only does this make it difficult to estimate the numbers of women rough sleepers, it also means that those women who are sleeping rough are less likely to be accessing the help and support they need. Whilst 60% of homeless women have slept rough, only 12% had engaged with street outreach teams.\(^{52}\)

St Mungo’s reports, this year, that 35% of women who have slept rough left home to escape domestic violence:

“Women only account for 19% of our residents who have slept rough, however the proportion of women for whom domestic violence led directly to rough sleeping is astonishingly high. Again when these women needed protection and a place to be safe there was no help available and they were abandoned to the streets. Services for these women are being cut and the homelessness duty to them is not being met. We found that 35% of women who have slept rough left home to escape domestic violence. Women made homeless by domestic violence who sleep rough on average have more needs that those who avoid rough sleeping.”\(^{53}\)

It is also likely that, at any given time, there are many women staying in ‘hidden’, informal and marginalised homeless accommodation situations. Interviews by Crisis showed an alarming number of such women engaging in unwanted sexual liaisons in order to secure accommodation or going back to old, potentially abusive, partners.

Hidden homelessness is also increasing, having been in decline. Both in Bristol and in Manchester we were told that there are many more homeless women who do not appear in the statistics because they spend time living with friends or relatives, often with periods of sleeping rough in between or by engaging in an unwanted sexual partnership to get a bed for the night. The Naomi Project in Bristol which supports street sex workers told us that “sofa surfing” was a very different thing for women, who may escape a violent pimp but invariably have to pay for alternative informal accommodation with sex.

The Refugee Council, along with WAST in Manchester, told us that the same was the case with asylum seeker women who became destitute and homeless and were frequently required to perform sexual favours in return for accommodation.

Many homeless women have complex needs and a high level of vulnerability, as Crisis reports, in particular in connection with having experienced physical and sexual abuse. Further the experience of homelessness, itself, can have severe consequences for women’s physical and mental health and well-being. Physical health problems, the onset

\(^{52}\) The Homelessness Monitor September 2011 ibid
of mental ill health, suicide attempts, drug and alcohol abuse, and ‘coping crises’ were commonly reported by respondents and attributed to their homelessness.\(^\text{54}\)

**New problems in providing emergency accommodation**

In Chapter 1, we chronicled the widespread cuts to women’s refuge services which both our original telephone survey and our evidence gathering sessions have revealed. We also referred to research by Towers and Walby, which reports that 230 women, just under 9 per cent of those seeking refuge, were turned away by Women’s Aid on a typical day in 2011, due to a lack of space.

At every Commission evidence gathering session, since this report was published and where that figure has been raised, the professional organisations working in this field have asserted that that figure was an underestimate. On a typical day 3615 women are living in refuge accommodation and the annual total of women and children accommodated annually is 16,815. Women’s organisations estimate that they have to turn away approximately half of the women who come to them for accommodation in 2012, which suggests that the numbers of women fleeing violence, who are not currently finding refuge accommodation every day, may be in the high hundreds or even be moving towards four figures, nationwide.

Eaves Housing told us:

“In the past it was rare that we could not find a refuge or hostel place for women calling us – maybe once every 3 to 6 months. Now it can be as often as 3 or 4 times a week when our staff, instead of getting a woman into a safe space can do no more than advise a young woman how to minimise the risk of harm if she has to sleep rough. She is advised to hang around places that are open late and quite busy and visible as long as she can – fast food joints, internet cafes, then to head for police stations or accident and emergency departments. On some occasions there is advice about different parks in London! Imagine what it does to our specialist expert staff here to help women victims of violence who turn to us trusting we can help and all we can say is here’s how to avoid the worst of the risk of sleeping on the street. These people don’t come back to us either if that’s all the help they got – what hope will they have, how will we know what becomes of them?”.

Specific examples cited to us at an evidence gathering event in London included

“A 16 year old girl leaving an abusive situation – we could not find her a place to stay and she therefore received advice as to which park might be the least worst option to sleep in. On one occasion a young woman ended up at the Occupy London site thinking at least there were people and tents and she might be safe. “

“A mother fleeing an abusive partner had been staying temporarily with an in-law but the in-laws didn’t want the marriage to break down and were trying to persuade/force her to return to the abusive partner. Eventually they said she could no longer stay knowing that her alternatives were the street or returning to the abusive partner so assuming she’d go back. The young woman had an 11 month old baby and phoned us for help. No places in refuge and anyway a homeless woman fleeing violence with an 11 month old baby in December is

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\(^{54}\) Brighton&Hove CSP Domestic Violence Needs Assessment ibid 2011
surely a priority for rehousing? So we tried to help her to get assessed by a homeless persons unit and housed by them. They refused. Eventually after hanging around in an internet café till about 11 at night wondering what she and her baby would do for the night the HPU said she could stay in a B and B for one night but they wouldn’t assess her or provide her with anything else and Social Services had to cover the cost. She slept one night at the B and B and the next morning was on the streets again starting the whole process again – this time she hung around fast food restaurants while again we worked with lawyers to harass the HPU – once again they said one night’s B and B (again Social Services to pay) but no assessment and no other support. Finally on the third day we started all over again, by now the baby was showing signs of illness – they agreed they had to give her an assessment.

We were told at an evidence session in London that a specialist hostel was providing support to young women under the age of 18 at risk of homelessness, often fleeing neglect and abuse in teenage relationships and in their families, was closing. These girls had relatively low support needs, but just needed a safe and supportive place. They would be recovered into education and employment and moved on quickly and successfully, with little harm and little cost. The closure of this young women’s hostel means these girls are now being referred to adult mixed hostels in rundown areas, where pimps and drug pushers are hanging out waiting to pounce on the vulnerable, where men and women with substance, mental health and prostitution issues are sharing accommodation. This is to condemn these girls to significantly increased risk of addiction, exploitation, prostitution and long term expensive health, crime and welfare issues when they could have avoided all that and been routed more smoothly into education and employment.

We were told that the HPUs (Homeless Person’s Units) are under financial pressure to ration access to support by refusing to even assess people as an assessment can lead to accepting a duty of care and having to support that person (acceptances). However, many hostels have a referral process that has to go through the HPUs. If the HPU won’t refer someone then the hostel has an empty bed or “void”, however many homeless women there may be in their area.

Women’s organisations told us that a further issue is that this change in attitude from HPUs has compelled them to resort frequently to getting solicitors to write letters threatening court action in order to force them to support women fleeing violence.

Clearly the declining availability of refuge space will make more women homeless and there appears to be a “double whammy” under way in that homelessness caused by violence at home is increasing at the very time that refuge availability is, as our survey and our evidence show, diminishing.

The Future of Service Charges for Refuge support work

We found endemic concern about the service charges that refuge accommodation receives to pay for services such as play support, counselling, security, laundry and for the redecoration and refurbishment necessary because of the high turnover rate of women with children who are often traumatised, angry and confused.

A recent consultation document says:
“The Government proposes to change Housing Benefit for those who live in supported housing within the social and voluntary sector. The consultation document seeks your views to inform the detailed policy design.”

The consultation is therefore on the design of the policy and not on the policy itself. The concerns flow from the range of possibilities in the document, for instance that the service/management charge should be linked to Local Housing Allowance in some way or that all that should be paid by DWP is the flat rate housing benefit and the service charge should be a top up from the local authority – moving the responsibility for this element from those allocating benefits to those commissioning local accommodation.

The change is to bring existing emergency temporary accommodation, such as refuge provision, within the Universal Credit (UC) into which housing benefit payments will be included

Although the consultation occurred last year no announcements have been made and the sector remains concerned about what is coming next.

“We are still getting the service charge as well on housing benefit at present though we think they will squeeze it or remove it all together one of these days.”

Participant, West Midlands evidence gathering session

According to Eaves, limiting service charges would be the “last nail in the coffin” for the viability of minimum standard, specialist refuge provision.

Impact of the change to Local Housing Allowance – The Shared Accommodation Rate

In many of the centres where we took evidence, we heard concerns about the limitation on housing benefit provision being put by the Government onto single people under the age of 35, who, from January/April 2012, can only claim housing benefit to pay for a room to rent in a shared property. This is called the shared accommodation rate and is currently applicable to those aged up to 25. The Government estimates that 88,000 more claimants will be added to the current 75,000 by this change. Every housing charity whose website the Commission has searched, says that there is a shortage of this kind of accommodation. While there are many criticisms of this proposal, which will cut already meagre local housing allowance for single people by an average of £41 per week, clearly the overarching fear is that there will, as a consequence, be an increase in homelessness.

Additionally the charity, Crisis report that for SAR claimants:

‘the prospect of sharing with strangers was a source of considerable anxiety…… especially for female claimants.’

Women’s groups emphasise the vulnerability of women fleeing from domestic violence.

55 http://www.dwp.gov.uk/docs/consult-supported-housing.pdf
The prospect of sharing accommodation with strangers for a woman who has suffered domestic abuse so significantly that she has been force to leave home may be very frightening. This is likely to have the effect that women will be desperate to stay at a refuge for at least 3 months.

There is also a shortage of one bedroom social housing so that there is increasing need to use the private rented sector for women escaping violence. However, there is little availability of shared accommodation there either, and no real standards of service or security are in place. There are also, of course, few means of regulating with whom accommodation will have to be shared. If the cumulative result of changes to SAR is that more women are assessed as homeless, or require longer periods of support in refuge provision, it may well end up costing more.

In the Birmingham area we were told that it is increasingly difficult to get people moved on to make space in refuges. Some local authorities are increasingly content to leave women in refuges where they are safe and getting support so that they don’t have to engage social services, re-house and start to do risk assessments.

However, while one part of a local authority may be content to leave women in refuges, Supporting People outcome targets for this kind of accommodation usually include moving on times. Bearing in mind that this accommodation is expensive, move-on times are unlikely to be increased to accommodate delays in finding shared accommodation, though there is universal recognition that it is in short supply.

Of great concern is that if there becomes a “bed blocking” position in refuge accommodation the whole model is threatened, supply to the needy is further severely reduced and funding streams may be weakened or decreased. This may compel refuge providers to give childless women a reduced chance of accessing refuge provision when they flee domestic violence and abuse. There was no discussion of this in this Government’s impact assessment on the change to the SAR.

The Government granted an exemption from SAR for people moving on from at least three months in a hostel, but this is targeted at formerly homeless people and it is not clear that refuges will fit the definition of a hostel.

The Chief Executive of Crisis, in welcoming that exemption, said:

“Shared accommodation is completely inappropriate for formerly homeless people but it is baffling why the Government cannot see that the same is true of other vulnerable people such as...... those fleeing domestic violence.”

In Bristol we heard a further concern that when women flee domestic violence, their children sometimes have to be taken into care. If a mother has children in care, she will only be allowed to have her children back when she can accommodate them. Yet, she will only be able to claim the SAR until she does so and this means and may be presented with serious difficulties in re-assembling her family and resettling. At the very least, the local authority should be challenged to overcome this dilemma, although, as we have reported above, women’s organisations are finding that financial pressures are making councils unwilling to give support even where they have a statutory obligation to do so.

In Bristol, we were fortunate to have the input of Fawcett and to have access to their Report on the impact of the cuts on women overall 58

We were told that Bristol City Council is proposing to reduce the number of bed spaces available specifically for women, from 42 to 37 and that a small 5 bed scheme for women needing high-level support, The Well, will close.

Also in Bristol, we heard evidence from the One25 Project, who told us that they had been forced because of lack of funding, to close their four bed mother and baby home, Naomi House - the only mother and baby drug treatment service in England for women escaping sex-work and just one of two for mums with addictions. The project continues to work with women street sex workers and told us that the beneficial effects of giving such mothers a stable place with a front door of their own, especially “a managed front door” was immeasurable for their security and for the prospects of future progress towards a different lifestyle. Such early contact with their babies was also of huge importance for the wellbeing and development of mothers. The assembled evidence providers at our Bristol session felt that the Naomi house closure was a serious blow to creative engagement with hard to reach women and that it foreshadowed funding threats to many other small but vital women’s services in the city.

At the other end of the spectrum, Bristol University’s School for Policy Studies, which we were fortunate to have represented at our evidence session, told us that in research last year on women and homelessness 59 they had found:

“There is no acknowledgement that women with high support needs might need a safe place to stay yet feel unable, initially, to sign up to more targeted interventions. We have real fears that the proposed closure of the women’s night service, in a central location, will put individual women in danger. “

A final concern connected to benefit changes is that Universal Credit will be paid as a single payment to one partner in a couple. The Women’s Budget group have expressed concerns that this will increase women’s financial dependency on their male partners and reduce women’s independent access to economic resources (reported by Towers and Walby). Not only is that of general concern for women’s equality but women find it harder to leave violent households if they cannot access cash to facilitate the immediate costs.

The Impact of Housing and Welfare Reform: Recommendations

It is clear that:

1. Homelessness among vulnerable women, particularly victims of violence, is beginning to grow and has the potential to grow perhaps to crisis proportions;
2. Refuge provision is dependent on rental income, usually through housing benefit, as well as local authority funding, mainly from Supporting People. Any change to service charges in Housing Benefit could therefore make services unviable;
3. The change to the Shared Accommodation Rate may block progression of women out of refuge accommodation, given the shortage of suitable stock and may ultimately end up costing more;

59 http://www.bristol.ac.uk/sps/research/projects/completed/2010/rj5274/
4. In any event such women are often very vulnerable and could suffer from being forced to share accommodation with others.

The Women’s Safety Commission recommends:

1. That the Government urgently advises local authorities that price cuts in Sanctuary Schemes may defeat their purpose;
2. That, as moves towards Universal Credit continue, the Government recognises that it is imperative that the vital services for women fleeing violence provided in refuges are safeguarded and refuges are not imperilled by changes to the way those services are funded;
3. That the refuge system itself is not put in danger by lifting the SAR age to 35, so that women whose only option is shared accommodation cannot be moved on, either because of their vulnerability or the lack of stock.
Chapter 6: Portrayal and Presence of Women

Throughout the evidence sessions many participants argued that the violence and harassment women face in their everyday lives is reflective of the way in which women are defined and depicted in popular culture. It became clear that attitudes towards violence and harassment, but also wider cultures towards women are now starting at schools and having an impact upon young women as they grow up.

In this chapter we report back on the discussions of this broader context within the Commission’s work and the evidence the Commission received about the impact of this portrayal on the personal safety and freedom of women’s lives. It looks at how participants felt women were depicted in the media, the role of schools in addressing cultures of harassment, the consequences of the absence of women from positions of influence and the role of social media in both the harassment of women and challenging these trends.

Starting early – the role of schools and education

“I can’t think of one night in town when me or one of my friends hasn’t been groped.”

Participant, aged 16-18, Brixton evidence gathering session

Many respondents, including those of primary school age, argued girls faced pressure to conform to particular stereotypes from a much younger age than is often recognised. They talked about the behaviour of young boys within their schools towards them and the pressure they felt at this young age about their difference as girls. One of the youngest respondents to the Commission stated she wanted there to be a ‘safe space’ in her playground in which she could escape from negative male attention and not feel ‘bullied’. A youth worker also talked about the need for their team to provide girl only sessions at their youth centre, as young women were less likely to attend their mixed session and often faced harassment when they did.

Concerned about the extent of this problem, along with growing concerns about both girls and boys in gangs and groups, the Children’s Commissioner has launched an inquiry into the extent of the sexual victimisation and abuse that young children face and will report this summer.

“Boys who are like 12 and 13 buy them and bring them [lads magazines] into school - it makes me feel really uncomfortable.”

Participant, aged 16-18, Brixton evidence gathering session

Those who work with young girls spoke of seeing girls attend primary school wearing make up and discussing the pressure to follow a certain image of themselves or form relationships with boys. They expressed concern that girls under twelve were being encouraged to dress and behave as celebrities who act in this way. One youth worker from Brixton described the perpetual ‘negativity’ towards young women, with girls as young as 7 or 8 in her care exposed to repeatedly negative or damaging images of themselves and the place of women in the world. They explained that girls themselves repeated these images and ideas to each other, as well as young boys as they copied the environment in which they lived.
She went on to describe how some of the girls she worked with who joined gangs and were violent themselves. She argued they were aggressive because ‘they want to be taken seriously’ and did not have a way of expressing this concern that was not about ‘being the big mandem’. One girl, aged 13, described her lack of hope about her future given her involvement in gangs. She stated she did not think she would live to the age of 19 because of the violent and difficult situations in which she participated and found herself facing.

Several participants argued that keeping women safe involved challenging these negative ways in which women are portrayed in society, and that it was important to do this from an early age. They talked about the way in which schools were a focus of peer pressure and the need to recognise that discussions which took place in playgrounds as well as in the home could be challenged.

Yet other participants highlighted that there was a reluctance to have ‘difficult conversations’ about cultural and social stereotypes especially in relation to harassment. One participant who ran a project running workshops to empower both young girls and young boys described the difficulties they faced going into schools to talk about sexist imagery and violence, with many schools reluctant to allow them to work with their pupils. A teacher who gave evidence to the Commission highlighted that whilst religious, homophobic and racist bullying was covered in the curriculum, sexism did not have the same status. Yet another participant from the voluntary sector who ran projects in schools argued that it was parents who were both aggressive in either challenging the provision of such personal or social care discussions or any attempts by schools to regulate the personal presentation of students. A young participant also argued the attitudes of teachers themselves could be problematic. One young respondent described how a teacher said ‘girls who wear short skirts have lower standards,’ making reporting concerns about harassment at school harder to do, given the fear that they would be judged for their appearance by those in authority.

**New Media- Help and Harassment**

Many younger respondents also talked about the impact of social media and online forums on the depiction of women in popular culture. For some, these technologies were a forum that enabled the harassment of women, as well as providing a platform for the incitement of violence against them. For others it was a forum in which women could come together to collaborate in challenging these concerns, a space in which they could campaign and raise issues in a way previously denied to them by the mainstream media.

One participant highlighted the ‘uni lad’ online magazine which made light of the rape of women and the ‘Assess My Breasts’ website run by Nuts magazine, which encouraged women to upload pictures of their breasts for comment and consideration by readers.

“If the girl you’ve taken for a drink... won’t ‘spread for your head’, think about this mathematical statistic: 85% of rape cases go unreported. That seems to be fairly good odds...remember, Uni Lad does not condone rape without saying ‘surprise.”

**Uni Lads Magazine Website**
Many respondents to the Commission described the abuse they had received online, receiving unsolicited messages regarding their personal appearance or making sexual advances towards them. Women journalists and public representatives told the Commission how every time they published articles or comment online, particularly those features which focused on women, they would frequently receive comments and tweets denigrating them as women as part of feedback on their writing or videos.

Others explained how social media had been used by older men to access young women and make sexual advances. Younger respondents to the Commission argued that the lack of safe spaces in which to interact with members of the opposite sex led young boys and girls to use social media to make friends and explore their own curiosities, often befriending members of the opposite sex who are much older than themselves (see chapter three for further discussion of this point).

The Commission also heard evidence from a blogger who had used the internet to organise a successful campaign challenging the use of stereotypes in Hamleys about the toys to buy for young boys or girls. Thus, she argued, even at an early age girls and boys are encouraged into types of behaviour and mindsets that impact in later life.

She highlighted how using a range of online mediums had enabled her to promote her campaign as well as gain supporters, who she would not have been able to contact without using social media. The blogger argued that she had used this technology to challenge the social stereotyping behind the depiction of particular toys or colours because these stereotypes reflected the wider concern about the role of women.

As many respondents highlighted, there is a growing concern that the ways in which women are covered by the media is increasingly focussing on their physical appearance. They did not argue that there was a direct correlation between this and increasing violence against women, but rather a more subtle association between these factors because of the environment it creates. When women are judged by their physical attributes alone, the respect and empathy needed to achieve equality becomes less likely. In turn, the absence of alternative depictions of women reinforces this environment.

“It’s not that lads’ mags cause all of these problems. The issue for me is they normalise certain things. If you can easily buy this in your corner shop then the step to treating girls in a certain way or watching porn online suddenly doesn’t seem as big...I feel like they’re changing the standards people judge things by...how men should act and what women should expect.”

Participant, aged 16-18, Brixton evidence gathering session

The cultural and social trends this chapter describes have long existed in British society, and would do so even without the rocket fuel of social media and the internet to assist their distribution. The Commission discussed how this culture isn’t one in which violence against women is inherent, but one in which it harder for women to challenge harassment.

The ability of society to address these concerns and the impact they can have on creating a safe environment for women of all ages depends on both a willingness to challenge negative images, as well as promote positive and diverse images of women.
Many participants in the Commission described their feelings about the way in which women are portrayed across the media. The Leveson Inquiry, as part of its wider investigations, has also been considering this issue, and in the light of the evidence presented to the Inquiry by various women’s organisations, we hope that the Government will properly consider its full recommendations.

The OBJECT campaign presented evidence both to the Commission and to the Leveson Inquiry, into of the portrayal of women as sex objects, through the repeated and routine focus on their physical appearance. They documented how women’s breasts, bottoms and genitals were continually presented, either covered or uncovered, for commentary and inspection within mainstream media. As well as expressing concern about the impact of this continual stream of sexual images on young children, OBJECT argued this persistent depiction of women made experiencing harassment more acceptable, and thus more likely. This concern was not restricted to the images used in publications. Research by the University of Middlesex has shown that members of the public could not differentiate between language in some ‘lads’ magazines and ‘justifications’ used by rapists.

Evidence to support the contention the language and images used by sections of the media influenced the level and nature harassment women experience in their daily lives came from a listening exercise undertaken for the Commission by volunteers with teenagers. This considered the media portrayal of women and how this placed pressure on both young girls and boys to behave in certain ways. It also considered the impact this presentation has on the relationships men and women form with each other and how men and women act around one another, especially in clubs. In particular, the participants linked the way in which girls were portrayed in ‘lads magazines’ that their peers read with their behaviour, often with negative and harmful effects.

“\textbf{I feel like boys who read those magazines and see these sorts of images can think that a group of girls dressed up are a) only doing it for male attention and b) want to have the types of conversations and experiences that are shown in Nuts.}”

\textbf{Participant, aged 16-18, Brixton evidence gathering session}

Other younger participants in the Commission’s evidence sessions expressed concern that much of the harassment of young women by young boys came from a desire to fit into popular culture. One participant explained that ‘boys look up to other boys’ and that without alternative role models to copy in how to act whilst growing up, young boys would copy each other’s attitudes and behaviours towards women to simply fit into their peer group.

Other contributors to the Commission spoke of the need to challenge ‘acceptable lads mag banter’, as it underscores a culture in which disrespect towards women is commonplace. They described how those who sought to express concern about this kind of ‘banter’ were often dismissed for not having a sense of humour, making it harder for women to speak up when they felt uncomfortable about the images and language used about their gender for fear of derision. They argued that there needed to be a shift in attitudes as to what could or should be accepted if we were to tackle the environment young women faced. Young men who took part in the Commission themselves also
suggested they felt uncomfortable about the pressure these images placed on them to behave in a certain way to conform to what young men should do.

“As a guy, some parts of the media make me feel pressured into acting a certain way so that I am seen as a ‘lad’. One of the ways to do this is to talk about women the way Nuts and Zoo do.”

Participant, aged 16-18, Brixton evidence gathering session

The absence of alternative depictions of women

Several contributors pointed to the absence of women’s voices, in contrast to the proliferation of images and discussion of their bodies, in public discourses about their role in society. Recent research by the Guardian newspaper has explored the domination of men of public life, and highlighted the absence of women in the media as a consequence. It showed that in a typical month, 78% of newspaper articles are written by men, 72% of Question Time contributors are men and 84% of reporters and guests on Radio 4’s Today show are men.

Further research has highlighted how this phenomenon extends to women in the media as a whole, for example through their absence on panel shows or older women presenting lifestyle shows. Recent campaigns have also raised concerns about the lack of air time given to women’s sport and negative consequences in encouraging women athletes. The exception to this was in dedicated ‘women’s’ media, where the majority of reporters and editors are female. However, a participant from this form of media argued this brought its own stereotypes to address, as restrictions were placed on the issues they could cover and the way in which they could be discussed.

In one of the evidence sessions, the Commission discussed this research and the experiences of women journalists in seeking both airtime to explore issues from their perspective as female reporters and to raise awareness of how issues affected women. They argued there were a number of issues to address given the absence of women in positions of influence. In the first instance, ensuring that ‘women were in the room’ could help in improving the way in which issues affecting women’s lives were raised. They highlighted the ‘80/20’ split, with this reflecting the ratio of women in parliament, mainstream media and in business. One participant suggested that when the percentage of women rose beyond 30% ‘men would say there were a lot of women’ and there was a resistance to moving beyond this ratio. Therefore they argued there was a ‘critical mass’ of women required in any decision making process to help overcome any barriers to their participation.

Yet they also pointed out that simply having women in positions of influence was not in itself enough to guarantee more equitable outcomes. They argued that women also needed to not replicate social and cultural stereotypes that disadvantage them when attaining positions of influence. The group extended this principle not only to those in formal positions of power such as political representatives or editors of publications or websites, but also all those in positions of influence in business, media and public life in general.
The Portrayal and Presence of Women: Key ways forward

It is clear that:

1. Concern about attitudes towards harassment and violence are surfacing in schools and are impacting upon young women and children;
2. New media and social media raises both new challenges and opportunities for addressing these cultures and attitudes;
3. Many women are concerned about the depiction and portrayal of women in the mainstream media;
4. The worry about the way girls are portrayed and should behave is common in younger girls, even those of primary school age;
5. Some women are concerned that negative and damaging portrayals of women can create a culture of disrespect for women, which can, in turn, makes it harder to challenge harassment;
6. Many women also feel that this situation is made worse by the disproportionate lack of women’s voices, both in the media itself, and more widely in public life.

The Women’s Safety Commission recommends:

1. That the Government gives serious consideration to the recommendations coming out of the Leveson Inquiry on the depiction of women in the media, especially in light of the evidence given to the Inquiry by women’s organisations;
2. That schools are supported to promote positive imagery and discussion of women in society, to both young girls and boys, and to tackle sexualised bullying and harassment amongst children of all ages.
Annex: Evidence and Commentary from EVAW

A Different World is Possible: Preventing violence against women and girls
Holly Dustin, Director of the End Violence Against Women Coalition

Our submissions to Everywoman Safe Everywhere

End Violence Against Women is the UK’s largest coalition of experts, frontline women’s services, survivors, academics, and human rights and equality organisations campaigning for an end to all forms of violence against women and girls in the UK. We were delighted to welcome Vera Baird QC to a special meeting on 15th February 2012 to hear from our experts about the critical issue of preventing violence against women and girls (VAWG).

VAWG has been described by former UN Secretary General Kofi Annan as ‘perhaps the most pervasive violation of human rights’ across the globe. It bears huge costs – for women and their families, for public services and the economy as well as to our community and society. We simply cannot afford to continue to see violence as a fact of life which we just need to get better at mopping up. Indeed, the World Health Organisation (WHO) 2004 report The Economic Dimensions of Interpersonal Violence found that preventing violence is cost beneficial and cost effective.

This is our evidence to Everywoman Safe Everywhere. It is based on our evidence-session to the Commission and subsequent consultation with our members. It draws on our ground-breaking reports, in particular A Different World is Possible in which we set out ten key areas for action.

Why prevent violence against women and girls?
One of the biggest challenges we face as a society is how to achieve the ultimate goal, to which all main political parties are committed, of a world free from violence against women and girls (VAWG). That is: a world where women and girls feel safe in their homes, schools, workplaces and communities; where they do not fear being forced to marry someone simply because they’ve fallen in love with the ‘wrong’ person; where they are not sexually abused, harassed or exploited, where their lives and behaviours are not restricted by the threat of violence; and where they are not bombarded with demeaning, sexualized and sexist images in newspapers, magazines, adverts, music videos and social networking sites.

The threat of VAWG changes our behavior. I have started wearing shorts underneath my skirt as they walk they...sometimes they come up behind you and put their hands on your chest (young woman, Year 9) Our Yougov poll found that one in three young women experience unwanted sexual contact at school]

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60 See our website www.endviolenceagainstwomen.org.uk for a full list of members
Our culture reinforces attitudes that condone VAWG. A Daily Mail report from March 2011 of the case of six footballers convicted of raping two 12 year old girls describing this serious assault as a ‘midnight sex orgy’. http://www.dailymail.co.uk/news/article-1367377/Six-footballers-jailed-gang-rape-12-year-old-girls-midnight-park-orgy.html

Developing technologies - the explosion of the internet and the ubiquity of mobile phones – have massively increased the ways in which women can be abused, harassed, exploited etc. Below is a screenshot from UniLad twitter account @UniLadMag on Sunday 26th February. The tweet says Would you wake her? Retweet if you would!

Surveys consistently show that different sections of society hold deeply entrenched and prejudicial attitudes about violence against women;

- 36% of people believe that a woman should be held wholly or partly responsible for being sexually assaulted or raped if she was drunk, and 26% if she was in public wearing sexy or revealing clothes.  
- One in five people think it would be acceptable in certain circumstances for a man to hit or slap his female partner in response to her being dressed in sexy or revealing clothing in public.
- 43% of teenage girls believe that it is acceptable for a boyfriend to be aggressive towards his partner.
- 1 in 2 boys and 1 in 3 girls believe that there are some circumstances when it is okay to hit a woman or force her to have sex.

Whilst VAWG is more prevalent amongst women in England than stroke, diabetes and heart disease, preventing violence has long been the most neglected part of government policy by all political parties. Prevention initiatives are usually piecemeal with little investment in research and evaluation. Schools have failed systematically to embed VAWG in the curriculum and school policies. Government awareness campaigns have generally been ad-hoc and short-term and there has been no measurement and monitoring of community attitudes towards VAWG.

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64 Home Office, Violence against women opinion polling (2009).
67 Zero Tolerance, Young People’s Attitudes to Sex, Violence and Relationships (1998)
68 Taskforce on the Health Aspects of Violence Against Women and Children, Responding to violence against women and children – the role of the NHS (2010).
VAWG is recognised internationally as a human rights obligation. Under the European Convention on Human Rights and the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), the UK has obligations to exercise due diligence in preventing violence against women before it happens. Under CEDAW and the Beijing Platform for Action, the UK also has an obligation to change attitudes, cultures and stereotypes that perpetuate gender inequality. The United Nations Convention on the Rights of the Child requires governments to ensure that children are free from violence, sexual abuse and exploitation. The United Nations Human Rights Council, of which the UK is a member, adopted a resolution in 2010 urging governments to adopt comprehensive measures aimed at preventing violence against women.

In Britain, the Public Sector Equality Duty under the Equality Act 2010 requires public bodies to take account of equality, discrimination and good relations, which means that local authorities, government departments, police forces and schools should examine their policies to ensure they are promoting equality between women and men, including how they are preventing VAWG.

It is absolutely clear that VAWG can be prevented. The World Health Organisation’s *World Report on Violence and Health* found that:

> Violence can be prevented and its impact reduced [...] The factors that contribute to violent responses – whether they are factors of attitude and behaviour or related to larger social, economic, political and cultural conditions – can be changed.69

The task seems daunting. But there is much that we can and surely must do if we want to end the needless harm caused by violence against women and girls.

**What is ‘prevention’?**

There are generally three categories of VAWG prevention based on a public health approach; primary prevention aims to prevent violence before it occurs, secondary prevention targets individuals and groups who show signs of being a perpetrator or vulnerable to victimisation, and tertiary prevention aims to address violence once it has happened or to prevent violence recurring. This submission is focused mostly on primary prevention whilst recognising that there are overlaps between the categories.

**How does prevention sit within a strategic approach to VAWG?**

End Violence Against Women came together as a Coalition in 2005 in order to call for more strategic and integrated approaches to VAWG in the UK. We initially carried out a series of ‘audits’ of Whitehall and Northern Ireland Executive departments called *Making the Grade?* As VAWG cuts across every area of public policy every department must play a role in prevention, however we found that work was uncoordinated and not strategic with prevention being the weakest part of the approach.

The lack of understanding about a strategic approach drove us to work with our expert members to develop our own template called **Realising Rights, Fulfilling Obligations.** This proved to be a catalyst for the Westminster Government, local authorities and key public bodies such as the Equality and Human Rights Commission to support this way of working. We showed that prevention should be at the core of any strategic response to

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VAWG along with the other essential P’s – perspective, policy, provision, protection and prosecution.\textsuperscript{70}

A strategic approach to violence against women and girls (adapted from Realising Rights, 2009)

Factors that contribute to VAWG

In order to take action to prevent violence, we must identify factors that contribute to it. We reproduce here an adaptation of a cutting edge ‘Model of factors at play in the perpetration of violence’, developed by Hagemann-White et al in 2010 for the European Commission.\textsuperscript{71} Of course, these are factors, not causal explanations. Every perpetrator makes a choice to use violence against women and girls and consequently must take responsibility for their actions.


\textsuperscript{71} Hagemann-White, C. et al, Model of factors at play in the perpetration of violence (2010).
Ten areas for action to prevent violence against women and girls

As the model shows, social structures that devalue women and reinforce male power are key factors contributing to VAWG so the prevention of violence needs to be located in overarching gender equality strategies at national, regional and local levels which include coordinated actions to address women’s economic, social and cultural inequality.

2. A ‘whole school approach’ to prevent of violence against women and girls across the primary and secondary education system
Prevention work is largely left to the voluntary sector where it can find supportive individuals at a school level, so coverage is uneven. Thus many schools are failing to meet their obligations under equality and child protection laws to provide safe and supportive school environments for all students.

Schools, Academies, Colleges, Universities and other youth settings can reinforce, and even condone gender inequality and VAWG but are equally important sites of prevention where gender stereotypes can be challenged and positive attitudes fostered. Our 2010 YouGov poll found that nearly one in three 16-18 year old girls have experienced unwanted sexual touching at school in the UK. Yet, this behaviour is rarely challenged; close to one in four 16-18-year-olds reports that no teacher has said that unwanted sexual touching, sharing of sexual pictures or sexual name calling were unacceptable.72 A 2006 ICM poll for EVAW found that 77 percent of young people feel that they do not have enough information and support to deal with physical or sexual violence. Research from organisations working with young women shows that they are being groped in class, harassed by text, and forced to drop out of school and get married. Young men feel pressurised to adopt masculine stereotypes.73 Research with young women and girls affected by gang-related violence indicates that Pupil Referral Units are male-dominated environments where they are further vulnerable to violence and abuse.74

Sexual harassment and bullying, teenage relationship abuse, child sexual abuse, forced marriage, domestic violence in the home and female genital mutilation places the educational attainment of girls at serious risk.75 For example, the stereotyping of girls and young women as available sexual objects may negatively influence girls’ achievement and opportunities by limiting their aspirations,76 exacerbated for young black women by racial stereotyping.77 Rigid gender stereotyping is also a key factor contributing to homophobic and transphobic bullying and violence in educational environments.

A 2010 study by the Child and Woman Abuse Studies Unit at London Metropolitan University found that there are that there are links between teenage pregnancy and non-consensual sex, based on gendered dynamics of pressure, coercion and expectation

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between young people and may be fuelled by media representations of sex.\textsuperscript{78} As such, universal provision of good quality Sex and Relationships Education is critical for ensuring the safety of young women and preventing VAWG.

A robust approach by Central Government is essential with mechanisms in place to ensure the delivery of a ‘whole school approach’ across the education system\textsuperscript{79}. VAWG needs to be embedded into the curriculum and teachers provided with the skills and tools to teach and respond to VAWG. Sex and Relationships Education (SRE) should be universally accessible for all young people and should be part of the statutory curriculum.

**Recommended actions:**

- All schools (primary and secondary including academies) should appoint VAWG champions amongst school governors and student councils.
- All schools should commission VAWG services to deliver prevention work and should ensure access for students to specialist VAWG support services in the community.
- All schools should ensure that their anti-bullying policies include an explicit reference to sexual harassment and gender-based bullying.
- Local authorities should champion a ‘whole school approach’ to preventing VAWG amongst all schools in their area and develop partnerships with local women’s services.
- Ministers and politicians should communicate strong messages to all schools about the importance of taking a ‘whole school approach’ to VAWG.
- The Department for Education should appoint a senior policy lead who is responsible for developing and implementing a department-wide action plan on VAWG.
- The Department for Education should work with organisations like the Centre for Excellence and Outcomes to ensure examples of best practice are disseminated widely across primary and secondary schools, including academies.
- There should be ongoing training for teaching and non-teaching school staff and governors to increase awareness and build skills to challenge VAWG.
- Under the Public Sector Equality Duty, the Department for Education and Local Authorities should set an objective on tackling VAWG in primary and secondary schools and collect, analyse and publish data on young women and girls’ experiences of all forms of violence in school, colleges and academies. to include regular school surveys on experiences of violence and attitudes.
- Central government should develop specific strategies to ensure the safety and well-being of girls in Pupil Referral Units and consider alternative behaviour management strategies for girls.
- The National Curriculum should include challenging gender stereotypes, sexualisation, healthy relationships, VAWG, media literacy and the harms of pornography to be delivered in an age-appropriate manner as part of Sex and Relationships Education and Personal Social Health and Economic Education.
- Ofsted inspection judgements on behaviour and safety should assess how well schools are tackling VAWG including sexual harassment and bullying, looking for evidence of all forms of violence against girls in schools.


\textsuperscript{79} Womankind Worldwide
• Ofsted should carry out a thematic review/survey into how well primary and secondary schools are tackling VAWG.

3. Funding for specialist VAWG services to deliver prevention interventions
As evidenced in EVAW’s 2011 report, Promising Practices to Prevent Violence Against Women and Girls, specialist services such as domestic violence projects, Rape Crisis Centres and support services for Black and Minority Ethnic women have decades of expertise and experience to inform prevention work across a range of settings. Ensuring adequate and sustainable funding for the VAWG sector to deliver prevention work, including investment in research and evaluation, is critical.

• Schools, academies and colleges should directly commission VAWG services to deliver targeted prevention interventions.
• Local Commissioners, including Police Commissioners and Clinical Commissioning Groups, should commission VAWG services to deliver targeted prevention interventions.
• The Home Office, Department for Health and Department for Education should allocate dedicated funding to VAWG services to design and implement prevention interventions. There should be specific funding for BME women’s services.
• The Home Office and Department for Communities and Local Government should fund the VAWG sector to train local commissioners and Police and Crime Commissioners on the benefits of investing in VAWG services to make savings in other budgets such as health, Social Services and policing as well as meet obligations under equality duties.
• The Department of Health should fund the VAWG sector to train Clinical Commissioning Groups on the benefits of investing in VAWG services, particularly on the health benefits of primary prevention initiatives.

4. Invest in research, monitoring and evaluation of prevention interventions
EVAW’s 2011 research into promising practices found that despite a plethora of innovative and creative prevention programmes there has been a significant lack of investment in research and evaluation. Furthermore there has been no ongoing measurement of community attitudes towards VAWG or prevalence data for some forms of violence against women such as forced marriage or sexual harassment. Such data is critical to measuring the long term impact of prevention strategies at a national level.

• There needs to be a cross-government VAWG Prevention Research Programme which: commissions research on good practice in prevention across diverse settings; invests in the evaluation of programmes; and collates and disseminates good practice in prevention.
• The Home Office should conduct a five yearly comprehensive survey on attitudes towards VAWG.
• The Home Office should develop a five yearly VAWG prevalence survey to measure the extent of all forms of VAW including domestic violence, sexual violence, forced marriage, female genital mutilation, sexual exploitation and sexual harassment.

5. Produce long-term, targeted and evidence-based public awareness campaigns
If we are serious about stopping the long term harm that violence causes we must challenge the social norms of male entitlement, negative gender stereotypes and myths
about VAWG. Our *We Are Man* short video produced by award-winning creative agency Kream, available on Youtube is an example of tackling peer approval of VAWG through a culture of disapproval of VAWG and peer approval of equal and respectful relationships.

This cannot be left to under resourced women’s NGOs. As with drink driving, there needs to be long-term investment in evidence-based public awareness campaigns to tackle the attitudes that excuse and normalise violence, targeted to the whole population and specific groups, such as BME communities. Central government and local authorities should draw on the expertise of the specialist VAWG sector to design, implement and evaluate campaigns so that they do not perpetuate myths or woman-blaming attitudes but invite members of the public to challenge attitudes and behaviours that condone violence against women in their peer groups. The award-winning ‘Know Your Line’ film by the London Havens is an example of this.

- The Home Office should lead the development of such a cross-government ten year public awareness strategy on VAWG developed with the VAWG sector.
- VAWG services should be supported to respond to increased referrals as a result of public awareness campaigns.

6. **Facilitate and fund community mobilisation to challenge VAWG**

Most women experiencing violence seek help and support through their family, friends, neighbours or others in the community in the first instance so the community response is critical. Yet, widespread attitudes that condone VAWG combined with the perception that violence and abuse is a ‘private’ matter often means that individuals stay silent or choose not to intervene. Mobilising the community to take a stand against violence is crucial to preventing VAWG from happening in the first place.  

Our research on promising practices found that community mobilisation and leadership at grassroots level is particularly important for transforming attitudes and driving local change. This can involve work on how to be an active bystander, ie intervening to challenge VAWG incidents or VAWG condoning comments. Evidence suggests that public awareness campaigns that promote gender norms against violence, combined with approaches that mobilise communities to stand against violence are more likely to produce cultural change than public awareness alone.

- Local authorities, Police Commissioners and Central government should fund VAWG services and experts to build capacity in communities to support survivors of violence and challenge both perpetrators and attitudes

7. **Promote leadership at all levels to champion gender equality**

There is a pressing need for political, business, union and community leaders at all levels to strongly challenge violence and to champion equality and respect for women and for there to be clear partnership working on this. Men and boys have an important role in showing leadership to prevent VAWG to send a powerful message to other men and boys about the importance of non-violence and gender equality, and act as a counterbalance to the sexist and violent cultural context which influences boys and men. This includes community leadership and bystander engagement programmes for young women and men to promote gender equality and challenge VAWG.

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8. Tackle the sexualisation of women and girls in media and popular culture

The sexualisation of women and girls in media and popular culture creates a culture in which VAWG is normalised and justified\(^{82}\). It perpetuates gender inequalities by reinforcing stereotypes of women and girls as merely sexual objects, together with the stereotype of male sexual ‘need’ and ‘entitlement’. Hagemann-White’s model of perpetration identifies the culture of violence in the media and the sexualisation of women and girls as major factors operating at a structural level contributing to VAWG. All three main political parties in Westminster have demonstrated their concern\(^ {83}\). Studies have shown a link between tolerance for physical or sexual violence and a repeated exposure to sexualised imagery in media and popular culture. Pornography is increasingly accessed by boys at a younger age and research suggests that this influences young men’s expectations of sexual relationships.\(^ {84}\) EVAW’s 2010 YouGov poll found that over a quarter (28\%) of young people reported they had seen sexual pictures on mobile phones at school a few times a month or more.\(^ {85}\) The normalising of violence, including sexual violence, and the glamorisation of aggressive male stereotypes in the media and on the internet also perpetuate negative attitudes and behaviour towards women.\(^ {86}\)

As Twitter accounts and Facebook pages that promote rape demonstrate all too well, developing technologies – the explosion of the internet and the ubiquity of mobile phones – have massively increased the ways women and girls can be abused, harassed, groomed or exploited. But traditional media, including daily newspapers, have been sexualising and objectifying women for decades. For example The Sport publishes sexualised images of near-naked women interspersed with adverts for pornography and other aspects of the sex industry. The paper frequently contains stories which are reported so as to trivialise or eroticise sexual violence. Newspapers like The Sport are displayed at child’s eye level and sold without age restriction, despite the fact that such material would be prohibited from the workplace for adults, and similar images restricted before the 9pm broadcasting watershed. \([A\;\text{story\;on\;the\;front\;page\;of\;the\;Sun\;about\;violence\;against\;two\;female\;celebrities,\;which\;is\;accompanied\;by\;a\;semi-naked\;and\;sexualised\;picture\;of\;one\;of\;the\;women\;in\;her\;underwear,\;thereby\;eroticising\;and\;trivialising\;the\;violence\;(26\;October\;2011)]\]

Government must take responsibility for addressing the harmful impact of sexualisation through better regulation of industries that are its sources, monitoring, education, media monitoring, public awareness raising and the provision of support services. However, it is critical that efforts to address the harmful impact of sexualisation on women and children do not seek to confine or restrict the healthy expression of sexuality for women and girls. Information for young people about sex in both heterosexual and same-sex relationships is essential, and can effectively counter and address negative stereotypes in sexualised media.

- The National Curriculum should require schools, academies and colleges to develop strategies to address the harmful effects of sexualisation, including

\(^{83}\) Letting Children be Children - Report of an Independent Review of the Commercialisation and Sexualisation of Childhood
\(^{85}\) End Violence Against Women and YouGov, Sexual Harassment in UK Schools (2010).
media literacy from a gendered perspective and to equip young women and men with the tools to identify gender stereotyping.

• Advisory or stakeholder groups including experts on sexualisation and VAWG prevention should be established in all key departments including the Department for Culture Media and Sport to monitor the representation of women and girls in the media and make policy recommendations.

• Government should ensure that gender equality is at the core of media regulation and establish a programme on gender equality in the media which should investigate and take action on: the regulation of retailers, the sale of Adult Top-Shelf Titles, ‘lads' mags' and other pornography; the content of advertising and of video games and music videos.

• Positive incentives for the non-stereotypical and non-sexualised representation of women and girls in the media should be established, including a media award.

• Broadcasters are required to ensure that music videos featuring sexual posing or sexually suggestive lyrics are broadcast only after the ‘watershed.’

• The government should develop a code of practice for business and retailers on the responsible sale of merchandise and products that perpetuate the harmful sexualisation of women and girls.

• Computers & software should be sold with protections on as standard and purchasers should have to opt-in to receive explicit materials, rather than the current opt-out provided by some ISPs.

• Several hundred websites celebrating “brutal”, “violent and forced sex” are freely accessible in the UK at present (‘rape porn’) because of a loophole in the 2008 Extreme Pornography legislation. This loophole must be closed by simply amending the legislation to include “rape or other non-consensual penetrative activity.

Below is a summary of our recommendations to the Leveson Inquiry which we have sent to the Prime Minister;

• The PCC should be replaced by a stronger body to hear complaints from groups as well as individuals; has powers to investigate on its own authority or through complaints; is independent of the press and has representatives of equality groups on it; of which membership is compulsory; and which can impose strong sanctions when complaints are upheld, including perhaps fines.

• Gender equality and issues related to discrimination on the basis of sex should be key distinct components of any new codes of practice for print media and women’s groups should be consulted to ensure these elements are appropriately captured.

• This new and independent body should continuously monitor patterns of discrimination.

• Journalists should receive training on the myths and realities of violence against women and how to treat victims as well as on issues concerning gender stereotyping and the harms associated with sexualisation and objectification.

• A new code of practice should be developed for the way ‘case studies’ are dealt with by the media

• Regulation of printed materials should be consistent with other forms of media regulation so that material which would not be viewed pre-watershed should not be printed in unrestricted newspapers.
9. Commission the voluntary VAWG sector to deliver quality training on violence against women and girls to a range of agencies as part of vocational qualifications and ongoing professional development

Too many professionals lack knowledge about the reality and impact of VAWG meaning that statutory responses are often inadequate at best, or at worst put women and their children at risk. Imkaan’s recent research on ‘harmful practices’ 87 shows that this can particularly be the case in relation to ‘honour’ based violence, forced marriage and female-genital mutilation. Specialist women’s services should be commissioned to deliver training which complies with minimum equality and human rights standards for all statutory agencies including education, health, criminal justice, immigration, housing and social services.

10. Target interventions to prevent violence against women from all backgrounds

Women who experience multiple forms of disadvantage are disproportionately affected by violence. For example, women with mental health problems and learning disabilities are particularly at risk of sexual violence but are less likely than other women to see justice done. 88 Ethnic minority and migrant women in the UK have a disproportionate rate of domestic homicide. Ethnic minority women may also be subject to specific forms of violence such as forced marriage, female genital mutilation and ‘honour’ based violence. So we need initiatives that are specifically targeted to address women of all backgrounds who experience VAWG.

• The Home Office should commission research to examine the nature and extent of violence against women who experience multiple disadvantages.
• All government departments and local authorities should ensure all data on VAWG is disaggregated by gender, race, disability, socio-economic status, age, sexuality and gender identity under the Public Sector Equality Duty.

We welcome Everywoman Safe Everywhere and have great confidence that this will lead to a commitment to the kind of long-term action that we need if we are not to fail future victims and survivors. Every part of government, every school, every workplace and every community must work together to play its part.