

**Template for submissions on the draft Third Domestic Sexual and Gender Based Violence Strategy Action Plan.**

**Submission Deadline:** 5pm Friday 4<sup>th</sup> March 2022.

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**Using the 4 pillars of the Istanbul Convention, under which the Strategy is written, answer in bullet point format the following questions:**

**Prevention:**

**Which actions here have the potential to have most impact?**

- All actions dealing with Education on Healthy relationships/gender equality at all educational levels (esp. Obj 1.3)
- Training actions (Obj 1.4)
- All actions combating harms of prostitution and pornography

**What in your view is missing/needs significant modification within this section?**

- Specific research- **based awareness campaigns** and **in depth interventions** for Young People’s (as minors) particularly who experience of DVA in their own intimate relationships, not just where they are subject to DV in their family
- No mention of legislation for statutory paid DV leave as a Govt commitment to workplace support for victims/survivors of DV, which has cross party support and should be named.

**Protection**

**Which actions here have the potential to have most impact?**

- 2.3.2 delivery of refuges/DV accommodation - Action 2.5.6 child contact centres urgently needed.
- 2.3.1 Develop a plan to assist victims remaining safely at home
- 2.4.5 Continuing development of the 2 national hotlines
- 2.5.8 and 2.6.2 resource services for children and young people and resource therapeutic supports.
- 2.1.4: ensuring interconnection with other important Govt actions which will have implications for DSGBV strategy.

**What in your view is missing/needs significant modification within this section?**

- Action 2.5.8: No action to overcome the issue of parental consent being **refused** by one parent (esp where DV/Coercive Control) as barriers to children accessing therapeutic support which is a significant/common issue.
- There is no **overall goal** of making the Family Law courts work for women and children escaping DV and address the issue of unsafe Custody and Access orders, which is a major issue for victims/survivors
- Need to add an action to ensure the **Family Courts Bill** and the work of the **Family Justice Oversight Group** commit to improve the Family Law system for victims of DV, including coercive control, and vindicates the rights of children to protection and a voice in court proceedings.
- There are no actions to address the economic impact of DV, such as legislation for Paid Domestic Leave to assist victims/survivors (should be added here or in **Prevention**, above)

- Need to add links with homelessness/ housing issues and actions to address them (remove barriers to social housing, keep the Special rent benefit), also; need explicit connection of DV accommodation to the National **Housing for All** strategy.
- In Obj 2.5 no explicit acknowledgement young people as victims of DV/SV from peers or adults, including in intimate relationships which requires specific interventions.
- In Action 2.5.5. the Strategy should explicitly acknowledge the principle of supporting the non-abusive parent as best from of Child protection (e.g. <https://safeandtogetherinstitute.com/about-us/about-the-model/>)

#### Prosecution:

##### Which actions here have the potential to have most impact?

- 3.1.1 Training
- 3.3.1 Implementing Supporting A Victim’s Journey and 3.3.2 research interaction Family Law, Criminal Justice and Child Protection
- 3.2.7 Widen Legal Aid
- 3.2.9 Preliminary trial hearings
- 3.2.10 Family law Court at Hammond Lane
- 3.4.1 DPSU resourcing and training
- 3.4.7 & 3.4.8 Domestic Homicide Reviews and implementing recommendations from FDHR Study

##### What in your view is missing/needs significant modification within this section?

- In Action 3.4.3: need to improve prosecution of breach of ALL orders under the DV Act, not only Barring orders (Protection, Safety, Interim Barring and Emergency Barring Orders)
- Under Objective 3.5: include Action to ensure mechanisms for victims/survivors to gain easy access to Safety Orders where a perpetrator is being released from jail. There should be no limitation on time since last contact/ abusive episode in such cases.
- Action 3.2.12 Restorative Justice: Concern re reference to ‘Mainstreaming’. This is not suitable in many cases, therefore; it needs to be explicit that RJ should never be a requirement (either formal or inferred) in any civil or criminal proceedings and must remain genuinely voluntary for the victim to take part in – or not - without prejudice.

#### Policy co-ordination:

##### Which actions here have the potential to have most impact?

- 4.1.1 Establishment of Agency
- 4.5 Intersectionality, assuming a baseline recognition of gender/sex discrimination first.
- 4.2 Strategy evaluation.

##### What in your view is missing/needs significant modification within this section?

- Under 4.2.3 research should include young people’s experience of DVA in their relationships
- Change Action 4.2.4 to **Commission** the implementation of a national DV/IPV prevalence study and include a prompt timeframe for this action, which **should not wait** until the completion of CSO SV study (implied in 4.3.4 but would be an unacceptable delay), as the last national data collection on IPV was in 2003 (for the 2005 NCC report)

#### Any other comments;

**New Agency/NGO Consultative Group:** we are concerned that the NGO Group seems to be isolated from interaction with Statutory organisations, which was the case previously with the National Monitoring Committee (which Women’s Aid has participated in since it’s foundation). For

co-creation and co-operation we propose the senior officials of the statutory bodies and NGOs should converge to learn from each other and problem-solve together as required.

**General comment:** A number of key actions are without a lead/support noted and some terms worryingly vague (e.g. 'consider', 'explore', 'map'). These terms should be avoided in any action plans, with clear activities and targets for meaningful implementation. Budgets should also be named in the action plan, and ring-fenced by Government, to ensure full resourcing of the plan.

Please do not exceed two pages and please return completed template to [info@kwresearch.com](mailto:info@kwresearch.com) by 5pm on Friday 4<sup>th</sup> March 2022.