

Joint Committee on the draft Domestic Abuse Bill

Women's Aid Federation of England's Response to the Call for Evidence April 2019

Women's Aid Federation of England (Women's Aid) welcomes the opportunity to submit evidence to the Joint Committee on the draft Domestic Abuse Bill. Women's Aid is the national charity working to end domestic abuse against women and children. Women's Aid was founded in 1974 and, over the past 44 years, has been at the forefront of shaping and coordinating responses to domestic abuse through practice, research and policy. We empower survivors by keeping their voices at the heart of our work, working with and for women and children by listening to them and responding to their needs.

We are a federation of over 180 organisations who provide just under 300 local lifesaving services to women and children across the country. We provide expert training, qualifications and consultancy to a range of agencies and professionals working with survivors and hold the largest national data set on domestic abuse. Our campaigns achieve change in policy, practice and awareness, encouraging healthy relationships and helping to build a future where domestic abuse is no longer tolerated.

Our response to the Joint Committee, has been informed by Women's Aid's data, research, evidence base and extensive consultation with our member services and survivors - including a survey conducted in 2018 that 184 survivors responded to.

We welcome the Bill as a once-in-a-generation opportunity to deliver a step change in the response to domestic abuse and other forms of violence against women and girls (VAWG). We have two core requirements, however, for the legislation that need to be met if it is to be truly transformative:

- Make domestic abuse “everyone's business” - tackled across all parts of society including housing, welfare, health and the family courts. This law simply will not work for survivors if it's focused on the criminal justice system alone, and so the Committee's scrutiny of these issues is highly welcome. This briefing sets out a range of recommendations across the public sector, our priorities for which are:
 - Reforms to deliver a safer approach to child contact and the family courts;
 - Changes to housing and homelessness legislation for survivors escaping abuse;
 - Ensuring that welfare policies protect survivors and their children;
 - Reforms to ensure migrant survivors have equal access to protection and support.
- Underpin the new law with sustainable funding which enables life-saving specialist services, and the public sector agencies that respond to domestic abuse, to meet demand for help and ensure every survivor gets the support they need.

We refer the Committee to our sister federations - Women's Aid Federation Northern Ireland, Scottish Women's Aid and Welsh Women's Aid - for their expertise on how the Bill will intersect with reserved and devolved powers within the UK.

A. MEASURES IN THE BILL

1. The statutory definition of domestic abuse

"It's essential that women feel believed and supported"

Anonymous survivor

- 1.1 Domestic abuse is a form of violence against women - a cause and consequence of women's inequality. Not only are women far more likely to be victims and men perpetrators, but women overwhelmingly experience coercive control within a context of fear¹, experience higher rates of repeated victimisation, and are more likely to be seriously injured² or killed by a partner/ex-partner. 73% of domestic homicide victims from April 2014 to March 2017 were women, 97% of whom were killed by men.³
- 1.2. Women will continue to be at risk of harm if the gendered nature of domestic abuse is not explicitly recognised in the legislation, which will guide policy, practice and funding priorities. The proposed 'gender-neutral' definition undermines the government's obligations under international law, including the Convention of the Elimination of All Forms of Discrimination against Women and the Istanbul Convention.
- 1.3. Whilst the statutory definition should apply to all genders, the dynamics and impact of domestic abuse on women and girls must be explicitly recognised - either in the definition, or preamble, to the Bill. The Istanbul Convention provides a clear precedent for this.⁴
- 1.4. There are specific problems with the definition that, if passed into law, will undermine an accurate and shared understanding of domestic abuse as a form of VAWG. The definition must:
- Clarify the significant differences between forms of abuse perpetrated in the home, ensuring clarity that intimate partner abuse differs in frequency, context, severity and impact from forms of family abuse.
 - Clarify that coercive control is disproportionately perpetrated by men against women, and underpins intimate partner abuse.⁵
 - Include different forms of abuse - forced marriage, 'honour' based violence, transnational marriage abandonment, dowry-related abuse and female genital mutilation (FGM) - that are disproportionately experienced by black and 'minority ethnic'⁶ (BME) women.

2. The role and powers of the Domestic Abuse Commissioner

- 2.1 We welcome the proposed new Commissioner role, as an accountability mechanism for scrutinising legislation, policy, practice, commissioning, funding and provision.
- 2.3 A qualified appointee must be recruited through a transparent process, and be someone all victims can trust. Meaningful engagement and consultation must be at the heart of the role and we welcome the requirements for the Commissioner to appoint advisory boards of both survivors and specialist domestic abuse services, and a specific focus on the response to survivors facing multiple forms of disadvantage. We do, however, have concerns about the Commissioner's proposed remit, powers of accountability, resources and independence.
- 2.4 The different forms of VAWG are interconnected; survivors have often suffered different types of violence and abuse, local services support victims with a range of experiences, and the best performing local areas tackle these issues together, not in silo. If the new Commissioner's brief is

¹ Dobash & Dobash, 2004; Hester, 2013; Myhill, 2015; Myhill, 2017

² Walby & Towers, 2017; Walby & Allen, 2004

³ Office for National Statistics (ONS). (2018) Domestic abuse in England and Wales: year ending March 2018.

⁴ Council of Europe Convention on preventing and combating violence against women and domestic violence requires states to recognise "the gendered dynamics, impact and consequences of these forms of violence and [operate] within a gender equality and human rights framework".

⁵ Women's Aid, [What is Coercive Control](#). Accessed 16 August 2018.

⁶ Imkaan (2018) From Survival to Sustainability. Available [online](#)

limited to domestic abuse they will only be overseeing parts of service provision, only some relevant data and parts of survivors' experiences. A truly robust role would be a VAWG Commissioner.

2.5 Underpinning the Commissioner's duties must be the power to effectively enforce - not only monitor - a framework of national accountability. The post-code lottery in the response to survivors remains unacceptable; in 2017-18, 21,084 referrals to refuge were declined and nearly one in ten refuges responding to our Annual Survey ran their service with no local authority funding.⁷ If the Commissioner is to tackle the poor funding and commissioning practices driving this crisis, they require powers to intervene where required and compel statutory agencies, other commissioners and government departments to take action.

2.6 It is essential that the Commissioner is fully independent. We recommend that they report directly to both Parliament and Government, and are sufficiently resourced, in this regard. Concerningly, the Bill's impact assessment provides the Commissioner with a budget of around £1 million per year.⁸ When the scale of domestic abuse⁹ is considered it is clear that the proposed budget - and current part-time designation - is not sufficient.

3. Domestic Abuse Protection Orders (DAPOs)

3.1 We welcome the introduction of DAPOs which, if effective, has the potential to improve safeguarding for survivors. Survivors we surveyed on the Bill supported the range of offline and online restrictions, and positive requirements which may be included. The government's intention to criminalise breaches is welcome and essential for ensuring survivors will trust these orders to keep them safe.

"Making breach of a DAPO an automatic criminal offence needs power of arrest attached and solid action taken against the perpetrator by police"

Anonymous survivor

3.2 There remain a number of concerns about implementation, however, with such a major change to current practice. Forces' use of the existing Domestic Violence Protection Order (DVPO) and their other powers remains extremely varied; if DAPOs are going to streamline existing orders, and provide a consistent pathway for protection, a clear implementation and training plan for forces will be essential. There will be significant new requirements for forces to monitor compliance with DAPOs, and take enforcement action where required, so it's concerning that the government's impact assessment does not anticipate any costs in this regard.¹⁰

3.3 Consistency across the routes for application for a DAPO¹¹ is another challenge. Our research shows that the response to domestic abuse varies significantly across jurisdictions, resulting in survivors receiving markedly different responses in family and criminal courts.¹² Orders issued in one court system must align to other proceedings - including child contact arrangements - and clear expectations for how agencies and courts deliver the DAPO regime consistently are required.

4. The introduction of special measures in cases involving domestic abuse

4.1 Special protection measures - including separate waiting rooms, screens and video-links - support victims to give quality evidence and can reduce some of the trauma of the process. The Bill will create an automatic eligibility for special measures in domestic abuse cases in the criminal courts, but these welcome measures will not extend to the family courts, where the problem is most acute.

⁷ Women's Aid (2019) The Domestic Abuse Report 2019: The Annual Audit, Bristol: Women's Aid

⁸ HM Government, HO0328- Impact Assessment: Draft Domestic Abuse Bill, 21 January 2019

⁹ Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services, *The Police Response to Domestic Abuse - An Update Report*, February 2019: Domestic abuse-related crime in England and Wales in the 12 months to 30 June 2017 and 12 months to 30 June 2016.

¹⁰ Government, HO0328- Impact Assessment: Draft Domestic Abuse Bill, 21 January 2019

¹¹ The government propose that a DAPO could be applied for by victims, police and third parties and issued across family, civil and criminal courts, including by their own volition.

¹² Birchall, J. and Choudhry, S. (2018), "What about my right not to be abused?" Human rights, domestic abuse and the family courts. Bristol: Women's Aid

4.2 Access to special measures in the family courts is currently so poor that survivors are being abused, harassed and left too frightened to effectively advocate for their child's ongoing safety. Our survey of survivors' experiences of the family courts with Queen Mary University of London (QMUL) in 2018 found:

- 61% had no access to any special measures;
- 33% stated that they had a separate waiting room from their perpetrator;
- 7% were provided with separate entry and exit times into the court room, or had access to screens;
- Just 4% had a video link.¹³

A survivor's experience

"I had to request for myself a separate waiting room area. And every time I put in that request, [...] when I'd arrive I'd find that the arrangement hadn't been passed [...] and he'd always be there – standing and intimidating."

4.4 The Bill must deliver equal access to special measures for victims across the family, criminal and civil courts. Failure to do so will leave survivors at continued risk of harm and an inconsistent approach to safety between jurisdictions.

5. The measures to prohibit cross-examination in person of alleged victims or perpetrators in the family court

5.1 Legal aid reforms have meant survivors now often face direct cross-examination by an unrepresented former partner, and may have to directly cross-examine them in return as a Litigant in Person. Perpetrators use direct cross-examination to exert power, control and fear within the court room.

A survivor's experience

"It was the worst thing I've ever had to do in my life, I mean the cross-examination was just disgusting (...) the judge twice stepped in and stopped him"

5.2 A survey of survivors by Women's Aid and QMUL in 2018 found that 24% of respondents had been directly cross-examined by their perpetrator in the family courts.¹⁴ This abhorrent practice prolongs the impact and trauma caused by abuse, diminishes the quality of evidence that survivors can provide and bars them from advocating for their child's safety.

5.3 We are delighted that Bill includes a ban on cross-examination. However, the prohibition will only apply where there is a criminal conviction or court order in place and, in other cases, will rely on judicial discretion.

5.4 As just one in five victims will ever talk to the police about domestic abuse¹⁵ the provision as currently drafted will not protect the majority of survivors. We are not assured that survivors will be able to access this protection effectively and fairly if it is subject to a judges' discretion; the Ministry of Justice's own research finds that judges are hesitant to use their discretion in such cases.¹⁶

5.5 We recommend that the prohibition is extended to direct cross-examination in any family proceedings in which allegations of domestic abuse are being determined, or where either party has admitted - or found to have perpetrated - domestic abuse.

¹³ Birchall, J. and Choudhry, S. (2018), "What about my right not to be abused?" Human rights, domestic abuse and the family courts. Bristol: Women's Aid

¹⁴ Birchall, J. and Choudhry, S. (2018), "What about my right not to be abused?" Human rights, domestic abuse and the family courts. Bristol: Women's Aid

¹⁵ Birchall, J. and Choudhry, S. (2018), "What about my right not to be abused?" Human rights, domestic abuse and the family courts. Bristol: Women's Aid

¹⁶ Crime in England and Wales: year ending March 2015, Compendium: Intimate personal violence and partner abuse, Table 4.28

¹⁷ Corbett, N.E. and Summerfield, A. (2017) Alleged perpetrators of abuse as litigants in person in private family law: the cross-examination of vulnerable and intimidated witnesses, Ministry of Justice Analytical Series

6. Polygraph testing

- 6.1 Measures to enable the National Probation Service to pilot polygraph (lie detector) testing with high risk domestic abuse perpetrators were not included in the original consultation on the Bill, so survivors and experts have been unable to provide views or feedback on this measure.
- 6.2 The government state that these examinations are effective in managing sexual offenders released on licence, but evidence of this remains highly contested.¹⁷ We recommend the measure be removed from the Bill, thorough consultation be carried out, and other options for how technology can be used to manage perpetrators are explored.

7. Compliance with the Istanbul Convention

- 7.1 We welcome the government's commitment to ratify this landmark international treaty, but we remain concerned that the UK will not be compliant with the Convention once the Bill becomes law.
- 7.2 Article 4(3) of the Istanbul Convention requires states to protect victims regardless of immigration status but, as is made clear in point 11.1 of this submission, the legislation as currently drafted fails to provide equal protection and support for migrant women.
- 7.3 The Convention also requires states to provide a wide-ranging package of protection and support to victims, including access to specialist support services and refuges. In 2018 there was a shortfall of 1,715 bed spaces in refuges in England, far short of the Convention's recommendation for one family space per 10,000 head of population.¹⁸

8 Domestic Violence Disclosure Scheme (DVDS)

- 8.1 We welcome the new statutory footing for 'Clare's Law', which can be a useful tool to provide some women with information about their partner's behaviour. It is critical to remember, however, that just one in six women in refuge in 2017 had seen a criminal case or sanctions against the perpetrator - so many perpetrators will never feature on a police disclosure scheme.¹⁹
- 8.2 A statutory footing for the scheme - including the new online application form - must ensure automatic signposting to support for those making enquiries, even if no disclosure is made, and should be delivered alongside improved training, and consistent implementation across forces.

OTHER PRIORITIES

9 Sustainable, long-term funding for specialist domestic abuse services, including refuges

- 9.1 If the Bill is successful, demand for specialist services will increase as more women have the confidence to disclose and reach out for help. Although the Bill's impact assessment recognises that the legislation will increase demand on public services, we are highly concerned that increased demand for specialist services - who are already struggling and routinely declining referrals - has not been considered.²⁰
- 9.1 Our 'Annual Audit 2019' reveals the extent of current, unmet demand within services - who are seeing rising referral rates, and survivors and children with increased support needs. 60% of all

¹⁷ Houses of Parliament, Parliamentary Office of Science & Technology, POSTNOTE 375 May 2011: Detecting Deception

¹⁸ Women's Aid (2019) The Domestic Abuse Report 2019: The Annual Audit, Bristol: Women's Aid

¹⁹ Women's Aid, Survival & Beyond: The Domestic Abuse Report 2017 (Bristol: Women's Aid).

²⁰ HM Government, HO0328- Impact Assessment: Draft Domestic Abuse Bill, 21 January 2019

referrals to responding refuge services in England in 2017–18 were declined - over one in six (17%) due to a lack of space or capacity.²¹

- 9.3 Despite the Ministry of Housing, Communities and Local Government (MHCLG) delivering emergency funding for refuges since 2014, the funding of support costs - needed to pay for support work for women and children, counselling, and advocacy – within refuges and wider domestic abuse services remains in crisis.
- 9.4 The fully devolved model of funding - where spending on, and provision of, life-saving services is not monitored by central government - has led to poor commissioning and competitive tendering processes going unchallenged. Contracts awarded to non-specialist organisations, and women’s specialist services being forced to close or reduce provision, is too often the result. Over half of responding domestic abuse services (57%) were running an area of their service without any dedicated funding in 2017/18.²²
- 9.5 Women’s Aid, in collaboration with Imkaan and Refuge, set out proposals for a long term model of funding for refuges - rooted in local areas, with national oversight - in 2018.²³ In response, MHCLG has committed to delivering proposals for long-term funding to public consultation. These proposals are urgently required alongside the Bill - as it is not possible to assess the effectiveness of the new legislation unless we have a clear financial commitment, and funding framework, for refuges and domestic abuse services to underpin it.

10 Protection for children in families where there is domestic abuse

10.1 Domestic abuse is the most common factor in situations where children are at risk of serious harm.²⁴ Findings from criminal justice, health and care inspectorates indicate concerning levels of understanding on domestic abuse, a lack of clarity on information sharing, and children not always ‘seen’ by professionals.²⁵

10.2 The safety of the child contact process is an urgent concern. Despite a number of welcome reforms, the seriousness and impact of domestic abuse is still treated very differently between the criminal and family courts. Inadequate understanding of domestic abuse as a welfare concern continues to lead to unsafe contact arrangements, and women and children exposed to further harm through the child contact and family court systems.

“Recognise, address and accept the impact that this also has on children, both through the effects that it (domestic abuse) has on the mother, and how it affects the children directly.”

Anonymous Survivor

10.3 The consequences of this can be devastating - from 2005-2015, 19 children were killed by a parent who was also a known perpetrator of domestic abuse in circumstances relating to unsafe child contact.²⁶ We urgently recommend the Bill improve the safety of child contact through:

- Prohibiting unsupervised contact for a parent on bail for domestic abuse related offences, or where there are ongoing criminal proceedings for domestic abuse;
- A change to the law to ensure that in cases of domestic abuse child contact arrangements are decided on an informed judgement of what's in the best interests of the child(ren) and not on the presumption of parental involvement;
- Providing for an independent statutory inquiry - with relevant legal powers and necessary resources - to deliver a wholesale review of the family courts’ handling of domestic abuse, and work towards a consistent response across jurisdictions.

²¹ Women’s Aid (2019) The Domestic Abuse Report 2019: The Annual Audit, Bristol: Women’s Aid

²² Women’s Aid (2019) The Domestic Abuse Report 2019: The Annual Audit, Bristol: Women’s Aid

²³ Women’s Aid, Funding a national network of refuges, 2018. [Accessible online.](#)

²⁴ Department for Education, [Characteristics of children in need: 2015 to 2016](#)

²⁵ Ofsted, HMICFRS, CQC, HMIP, ‘The multiagency response to children living with domestic abuse’, 2017

²⁶ Women’s Aid, Nineteen Child Homicides, Bristol: Women’s Aid, 2016.

10.4 Despite statutory guidance²⁷ on multi-agency working to safeguard children, inconsistent approaches across agencies and areas continue. Mandatory, specialist training and ongoing professional development on domestic abuse, and its impact on children, for all front line staff within relevant statutory agencies and the family courts must underpin the legislation, alongside consistent protocols to improve information sharing.

10.5 Access to essential support services for children remains a 'post-code lottery'. Although more children than women are resident in refuges, there continues to be no secure funding for this essential element of their service. The percentage of domestic abuse services able to provide dedicated support to children and young people fell to 52% in 2017²⁸ and many are now only able to deliver this through charitable fundraising. The Home Office £8 million fund for children impacted by domestic abuse for 2019-2021 was allocated to just seven local projects across England and Wales. A future funding model for domestic abuse services must integrate funding for children by default - and not an 'optional extra'.

11 Support for victims of domestic abuse with insecure immigration status

11.1 Ensuring full and equal access to support for survivors with insecure immigration status is a fundamental priority for the Bill. Migrant and BME women are particularly vulnerable to domestic abuse and VAWG, face extra barriers to reporting and seeking help,²⁹ and less likely to see the perpetrator held accountable by the criminal justice system.³⁰

11.2 Dedicated 'by and for' BME women's services are vital for meeting BME women's needs - from language specialism to expertise on immigration, discrimination and racism.³¹ Although the government makes clear that local areas should fund this provision, 'by and for' BME services face severe challenges within the current devolved funding model. In 2018 there were just 30 refuge services run specifically for BME women.³²

11.3 Urgent reforms are needed to end the insurmountable barriers facing survivors with NRPF³³ to accessing safety. Over a quarter (26%) of the women refused access to a refuge space supported by our No Woman Turned Away (NwTA) project in 2017 had NRPF - as refuges are unable to accommodate women without access to housing benefit, or other means, to pay rent. Many had to sleep rough, sofa surf or even return to the perpetrator while they waited for help.³⁴

11.4 The Domestic Violence Rule (DVR) and Destitution Domestic Violence Concession (DDVC) can provide a life-line to support. However, in practice eligibility conditions mean many migrant survivors face severe barriers to accessing the DDVC - which provides access to benefits for three months while a survivor applies for indefinite leave to remain (ILR). Two thirds (67%) of the women with NRPF supported by our NwTA project in one year weren't eligible for DDVC - because they weren't on a spousal visa.³⁵

²⁷ Department for Education, Working Together to Safeguard Children, 2018. [Accessible online.](#)

²⁸ Women's Aid, Survival & Beyond: The Domestic Abuse Report 2017 (Bristol: Women's Aid).

²⁹ Imkaan, *Capital losses: the state of the BMR ending violence against women and girls sector in London* (available [online](#): Imkaan, 2016); Siddiqui, H. and Patel, M. *Safe and Sane: A model of intervention on domestic violence and mental health* (available [online](#): Southall Black Sisters, 2010)

³⁰ Bates, L., Gangoli, G., Hester, M. and Justice Project Team (2018), Policy Evidence Summary 1: Migrant Women. University of Bristol, Bristol. [Accessible Online.](#)

³¹ Anitha, S (2010). No recourse, no support: state policy and practice towards South Asian women facing domestic violence in the UK. *British Journal of Social Work*, 40 (2). pp. 462-479

³² Women's Aid (2019) The Domestic Abuse Report 2019: The Annual Audit, Bristol: Women's Aid. [Accessible online.](#)

³³ We use this term to include those with insecure immigration status, undocumented migrants, asylum seekers and European Economic Area nationals, who all face significant restrictions in accessing state benefits.

³⁴ Women's Aid, Nowhere to Turn: Findings from the First Year of the No Woman Turned Away Project, 2017. [Accessible online.](#)

³⁵ Women's Aid, Nowhere to Turn: Findings from the First Year of the No Woman Turned Away Project, 2017. [Accessible online.](#)

11.5 We recommend the following be included in the Bill, and support Southall Black Sisters' 'Protection for All' campaign in this regard:

- Eligibility for the DDVC and DVR is expanded so all migrant women - not only those on non-spousal visas - can access this lifeline for support;
- An extension, or removal of, the three month time limit for the DDVC until ILR is in place, with revised guidance on what evidence of domestic abuse is required to access the DDVC.

11.6 Immigration status itself is routinely used by perpetrators as means to coerce and control, compounded by a 'hostile environment' and inadequate public sector responses to migrant women. We are highly concerned that over half (27) of police forces in England and Wales confirmed that they share victims' details with the Home Office for immigration control.³⁶ As a member of the Step Up! Migrant Women Campaign, we support calls for safe reporting mechanisms which ensures immigration enforcement is kept completely separate from the response to a victim.

Lina was eight months pregnant and fleeing domestic abuse. She needed to access the DDVC to have recourse to public funds, which would increase her chances of accessing a refuge space. The caseworker found an immigration advisor who had a legal aid contract. However, the standard protocol was for clients to queue up from 7am and the advisor would see the first 15 people. This was not possible for her as she was eight months pregnant.*

(*not her real name)

12 The role of healthcare services in early detection and intervention

12.1 Survivors have often been subject to years of abuse - severely traumatic experiences associated with long term health impacts. Almost all survivors interact with health services at some point which, for many women, are the only place they are safe to disclose. Health and social care professionals are in a crucial position to identify abuse, intervene early, and deliver support and referrals. Despite this, progress on the health response remains limited, and it is not a strategic priority within the health and social care sector at national or local levels.

12.2 We recommend that the Department of Health and Social Care (DoHSC) with NHS England, who are developing a new four year plan, deliver the following alongside the Bill:

- Consistent implementation of IRISi³⁷ to ensure that all healthcare settings are safe places where survivors can disclose and access help from trained professionals, who work in partnership with specialist services;
- A requirement for domestic abuse and VAWG to be included in Joint Strategic Needs Assessments, Sustainable Transformation Plans and the priorities of Clinical Commissioning Groups (CCGs);
- A national steering group, including NHS England and DoHSC, to drive progress in tackling domestic abuse and VAWG.

13 Non-legislative measures: training and a multi-agency response

13.1 Improving the multi-agency response to domestic abuse statutory agencies is a priority for the non-legislative package. The dominant approach is too often based on short-term risk management, not meeting the multiple support needs of women and children. The 'multi-agency risk assessment conference (MARAC) is only used for 'high' risk cases and usually excludes the survivor herself. Analysis of Domestic Homicides Reviews shows that some victims were assessed as low or medium risk, meaning they did not reach the threshold for intervention or support before they were killed.³⁸ Women's Aid's Change that Lasts (CtL) approach, more detail

³⁶ Step Up Migrant Women UK: Latin American Women's Rights Service, Safe Reporting of Crime for Migrants With Insecure Immigration Status, May 2017

³⁷ Identification and Referral to Improve Safety

³⁸ Nicola Sharp-Jeffs and Liz Kelly, Domestic Homicide Reviews - Case Analysis: Report for Standing Together, June 2016.

on which can be provided to the Committee, aims to ensure survivors get the right response the very first time.³⁹

13.2 It remains concerning that many public sector workers receive insufficient vocational training on domestic abuse and VAWG, leading to inadequate support provision. Our NwTA project continues to report on inadequate local authority practices; in 2017-18, over half of the survivors we supported who approached their local housing team were prevented from making a valid homelessness application, and 23% were told they weren't in 'priority need'.⁴⁰

13.3 Comprehensive training must clearly explain the different elements of the statutory definition, improve understanding of survivors' needs, and how to respond and support them effectively. Specialist domestic abuse training - such as our Trusted Professional scheme, part of the CtL response⁴¹ - is vital for ensuring that the right response is embedded and sustained within frontline practice. This will further increase demand for, and expertise from, already overstretched services - so additional resourcing will be required.

13.4 The government estimates domestic abuse costs society £66 billion a year in England and Wales.⁴² This issue has far-reaching impacts across health, education, housing, employment and many more parts of society. Changes to the criminal justice system will not alone 'transform' the response to domestic abuse, but urgent action on housing and welfare policy will deliver real change for survivors now. We therefore recommend the Bill:

- Delivers an automatic assumption that survivors are in 'priority need' for housing and do not need to meet an additional 'vulnerability' test, a call that is supported by the All Party Parliamentary Group on Ending Homelessness;
- Implements a statutory ban on local authorities imposing 'local connection restrictions' on refuge services;
- Requires all welfare reforms to be assessed for their impact on women's ability to escape abusers, delivers exemptions for survivors fleeing domestic abuse from the benefit cap and from repaying an advance payment of Universal Credit, and ends the two child tax credit limit;
- Introduces a statutory right for employees affected by domestic abuse to vary their working arrangements - including a period of paid leave - to help cope with its impacts.

³⁹ Women's Aid, [Change that Lasts](#), accessed 26.04.2019

⁴⁰ Data from 52 women. Women's Aid, Nowhere to Turn: Findings from the Second Year of the No Woman Turned Away Project, 2018. [Accessible online](#).

⁴¹ Women's Aid, Change that Lasts: Impact Briefing 2, 2018. [Accessible online](#).

⁴² Home Office (2019), The economic and social costs of domestic abuse: Research report 107. [Accessible online](#).