

Written evidence from Changing Lives

1. Introduction

- 1.1. Changing Lives welcomes the opportunity to submit evidence to the Justice Committee's pre-legislative scrutiny of the draft Victims Bill.
- 1.2. Changing Lives is a national charity, helping over 14,000 people change their lives for the better each year. We have around 100 projects in England, supporting people in the most challenging of circumstances including homelessness, addictions, contact with the criminal justice system, sexual exploitation, domestic abuse, long-term unemployment and more.
- 1.3. Changing Lives delivers a range of services to people who have been victims of crime, including victims of domestic abuse, sexual exploitation and modern slavery. We also deliver various services which are not specifically targeted at victims of crime, but which support people who are disproportionately likely to be affected by crime, including people who sell sex and people experiencing homelessness.
- 1.4. Changing Lives is also the lead partner for the STAGE Project, funded by the National Lottery Community Fund, to support adult women across the North East and Yorkshire who have been groomed for sexual exploitation and build an evidence base around their experiences of accessing justice, healthcare, housing and other forms of support. The STAGE Project brings together Changing Lives and seven other specialist charities – GROW, A Way Out, Together Women, Basis, WomenCentre, Ashiana and The Angelou Centre.
- 1.5. Key points:
 - 1.5.1. We recommend that the Bill include a requirement to proactively engage with victim support services as part of monitoring compliance with the Victims' Code.
 - 1.5.2. We welcome duties to collaborate and recommend that regard is also given to services that are not specifically victim support services but which support people who are disproportionately represented amongst victims of crime.
 - 1.5.3. We recommend that the Bill include explicit reference to specialist IDVAs/ISVAs, particularly related to people who sell sex or who have experienced sexual exploitation.
 - 1.5.4. We recommend that ISVA guidance be required to include reference to appropriate caseload sizes.
 - 1.5.5. We recommend that the Bill include a statutory definition of adult sexual exploitation to ensure that victims of crimes such as rape linked to exploitation, grooming and coercion are able to fully benefit from other measures contained in the Bill.

2. Monitoring compliance with the Victims' Code

- 2.1. We welcome the requirement in 5(4) that the experiences of victims in the police area must be taken into account when monitoring compliance with the Victims' Code. This is crucial as quantitative data cannot always capture what is most important to victims, and an over-reliance on quantitative data can create perverse incentives where agencies focus more on hitting targets rather than actually providing a quality service.
- 2.2. We would recommend that the legislation also include a requirement to proactively engage with victim support services as part of efforts to understand the experiences of victims. It is our experience that some victims will not wish to engage with the police or other criminal justice agencies due to lack of trust and previous negative experiences, which would extend to not wishing to disclose negative experiences or non-compliance with the Victims' Code, but may be more likely to disclose relevant information to voluntary sector providers with whom they have built up meaningful and trusting relationships.

3. Duties to collaborate in the provision of victim support services

- 3.1. We welcome the duties to collaborate in the provision of victim support services as we have previously recommended greater join-up of funding streams where possible. When there are multiple funding pots for different elements of victim support all operating on different commissioning cycles this means both providers and commissioners are constantly engaged in bidding processes and services become fragmented. This particularly disadvantages smaller organisations, including by and for organisations, who tend to have reduced bid-writing capacity.
- 3.2. We also welcome the fact that strategies for victim support must have due regard to the victim support services which are available in the police area, whether or not provided by the relevant authorities. This would address our concerns that non-commissioned services are more likely to be overlooked, despite playing a valuable role of raising the voice of victims who may struggle to access mainstream commissioned services. This includes victims experiencing multiple disadvantage, Black and minoritised victims, and victims of crime that require a specialist service for support such as victims of sexual exploitation.
- 3.3. We would recommend that strategies for victim support also have due regard to services in the area that support people who are disproportionately likely to be affected by crime. This could include, but by no means be limited to, people selling sex, people experiencing addiction and people experiencing homelessness. Due to stigma that they experience, such people may not always engage with criminal justice services or other victim support services, but may have shared their experience with other services such as addiction and recovery services.

4. Independent Advisors

- 4.1. We welcome more clarity around the role of independent domestic violence advisors (IDVAs) and independent sexual violence advisors (ISVAs). The definition as it currently stands in the legislation is very broad and could incorporate all kinds of caseworkers within domestic abuse and sexual violence services who would not normally be considered IDVAs and ISVAs.

- 4.2. In our experience, IDVAs tend to provide more short-term support aimed at reducing the risk to the victim, and then commonly triage into other services when the risk has been brought down. Long-term support may be provided by other specialist staff who are not usually defined as IDVAs.
- 4.3. Especially if the definition of IDVAs and ISVAs is intended to incorporate a wider range of support functions, we would recommend that the legislation explicitly require the guidance to include reference to the role of specialist ISVAs/IDVAs.
 - 4.3.1. For example, in Merseyside Changing Lives provides a service called ‘Red Umbrella’ which includes ISVAs who specialise in working with people who sell sex, engage in survival sex or have experienced sexual exploitation. They have a particular focus on engaging with this cohort who historically have been less likely to report to police due to low confidence and trust. Such services are crucial as mainstream ISVA provision often lacks the expertise or capacity to provide the support needed by this cohort of people.
 - 4.3.2. We are particularly concerned about the lack of consistent support for adult victims of sexual exploitation and would welcome this being explicitly addressed through legislation. Sexual violence services, including ISVA provision, are often designed for supporting victims through isolated incidents and are not equipped to appropriately support victims who have gone through years of grooming and exploitation. This could be addressed either through requiring specialist ISVAs and/or through the requirements of services to collaborate in commissioning support services.
- 4.4. In section 9(3) we would recommend that the guidance should also include provision about caseload sizes. ISVA caseloads in particular are currently far too large, meaning staff do not have the capacity to offer intensive engagement and long-term support.

5. Definition of adult sexual exploitation

- 5.1. A further measure that we would recommend including in the Bill is a statutory definition of sexual exploitation of adults. Whereas there is a statutory definition of child sexual exploitation, there is currently no such definition of adult sexual exploitation, despite the fact that exploitation often continues into or even begins in adulthood.
- 5.2. Our experience from delivering the STAGE project is that a statutory definition is needed because sexual exploitation of adults is poorly understood across many sectors, including criminal justice, health and safeguarding. Whilst a child may be recognised as vulnerable and a victim of exploitation, adults are more likely to be dismissed as “prostitutes” or “making poor choices”. This means that victims of horrific crimes such as rape, torture, kidnapping and serious violence are often not perceived as victims due to the impact of exploitation and coercion, blamed for their circumstances, or do not receive appropriate support.
- 5.3. This lack of understanding will have implications for the ability of this Bill to improve victims’ experiences. Various aspects of the Bill, including joined up

commissioning and strategies and guidance for ISVAs, would be improved by a consistent understanding of sexual exploitation of adults so that this could be factored into guidance and strategies. Without this definition, it is likely that we continue to see the needs of adult victims of sexual exploitation be overlooked and they will not be able to fully benefit from the measures in this Bill.

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