

Written evidence from The Drive Partnership

About the Drive Partnership

The Drive Partnership - Respect, SafeLives and Social Finance - believes that domestic abuse is not acceptable or inevitable. We advocate for changes to national systems so that perpetrators posing all levels of risk are held to account and can access the help they need to stop. The Partnership also co-ordinates delivery of the Drive Project, which works with high-harm, high-risk and serial perpetrators of domestic abuse to prevent their abusive behaviour and protect victims. Drive challenges these perpetrators to change and works with partner agencies – like the police and social services – to disrupt any ongoing abuse.

The Drive Partnership specialises in policy and practice relevant to the domestic abuse perpetrator sector. We maintain and advocate for a victim-centred approach as a guiding principle for all work with perpetrators. Therefore, we have referred to perpetrator responses throughout this submission as they are relevant to victim responses.

This submission reflects the views of the Drive Partnership – Respect, SafeLives and Social Finance – and should not be assumed to represent the views of the wider network of Drive commissioning and service delivery partners.

The key changes the Government should consider making to the Victims' Code, including consideration of those already proposed by the Government in its response to the consultation.

- The Victims' Bill must impose a duty to provide community-based specialist services that support and reduce risk for all victims of domestic abuse. This must include community-based perpetrator responses for a range of a wide range of harm and risk levels.
- We recommend the Victims' Bill strengthens the current duty to collaborate so that it requires local bodies to commission specialist domestic abuse support services for all persons affected by domestic abuse, with an accompanying package of appropriate funding.
- The Victims' Bill must impose a duty that all domestic abuse perpetrator interventions are commissioned with a high-quality and trauma-informed victim support service as an integral element. All elements should be quality assured.
- We recommend a national commissioning framework with a national, ring-fenced funding pot to ensure these vital services are supported, with a grant fund allocated specifically to PCCs to commission for groups likely to be less visible to, or appropriately served by, larger or more mainstream services.
- The Bill must include guidance for commissioners on ensuring adequate investment in a community-led workforce and leadership development programme for racialised communities.
- Commissioners must build appropriate allowances in budget and timescale for relationship-based commissioning of by and for domestic abuse services, including perpetrator response services, to allow equitable access to services for minoritised communities.
- Guidelines should be made available to facilitate best practice for appropriate guidance and decision-making around information sharing between agencies.

- It is essential that joint inspections are informed by lived experience, Domestic Homicide Reviews, Safeguarding Adult Reviews and Child Safeguarding Practice Reviews
- Inspectorates must continue to work together collectively to monitor impact after publication and involve a panel of statutory and voluntary sector expertise.
- Frontline professionals need cultural change training, guidance and advice, and cross-governmental systems change to implement joint inspections’ recommendations
- We recommend that SafeLives’ suggested definition of the Idva role is made statutory in the Victims Bill.
- In order for the Victims Bill to increase the effectiveness of Idvas, there must be sustainable funding made available
- Mechanisms used to gather feedback must be accessible to all victims, including those from minoritised communities
- The Bill must be amended to include a complete firewall between statutory services and Immigration Enforcement

The Government proposals to place a duty on the relevant criminal justice agencies (the police, the Crown Prosecution Service, HM Courts & Tribunals Service, Youth Offending Teams and HM Prison and Probation Service) to collect data and keep under review their delivery of the Code.

The Drive Partnership welcomes proposals to place a duty on the relevant criminal justice agencies to collect data and keep under review their delivery of the code. Within the proposed changes there is an understandable emphasis on the limitation of information sharing in order to comply with data protection legislation. **This needs to be paired with guidelines to facilitate best practice for appropriate guidance and decision-making around information sharing between agencies, similar to the duty for guidance to be provided by the Secretary of State on information sharing for victim support services.** These guidelines should also extend to information sharing from criminal justice agencies with other relevant agencies and services, including but not limited to health to reduce risk for victim-survivors of domestic abuse and allow for access to integrated support.

The Government’s proposals on the role of the inspectorates, including an improved focus on victims, and a new power for the Government to direct aspects of their work.

The Drive Partnership agrees that current inspectorate frameworks and programmes focus on and prioritise victims’ issues and experiences and welcome an improved focus on victims within the draft Bill. We particularly welcome the decision for Inspectorates to start working together to carry out joint inspections focused on domestic abuse, and the new ability for relevant Ministers to direct joint thematic inspections by criminal justice agencies.

It is essential that these inspections are informed by lived experience, Domestic Homicide Reviews, Safeguarding Adult Reviews and Child Safeguarding Practice Reviews to ensure that the stated policy intention of understanding the causes and best ways to deal with key issues relating to victims, and making recommendations to ensure improvements in the service provided to them are fulfilled.

Inspectorates currently lack the appropriate mechanisms to ensure the recommendations from each inspection are applied to relevant agencies. Despite the time and effort taken to incorporate victims' views and experiences into inspections, this results in the repetition of findings and recommendations between and across inspections, despite areas for action to improve victim safety and experience with the criminal justice system being identified.

It is imperative that inspectorates continue to work together collectively to monitor impact after publication and involve a panel of statutory and voluntary sector expertise.

For example, survivors and frontline professionals, including Children's Social Care, frequently reiterate the recommendations in the 2017 JTAI around turning the focus on to perpetrators of domestic abuse, recognising their harmful behaviour as an active parenting choice, rather than holding victims of domestic abuse to account for the impact of the abuse.

However, frontline professionals report that they are left without the tools to tackle perpetrator behaviour. **Frontline professionals need cultural change training, guidance and advice, and cross-governmental systems change to implement joint inspections' recommendations.** Strategic leads and those in middle management positions in the relevant agencies must fully buy into change and work to implement inspection recommendations.

Whether the legislative steps proposed by the Government will lead to an improvement in the commissioning of support services?

Placing a duty on a number of authorities working in a police area to collaborate when exercising their existing support functions is a welcome shift toward a multi-agency, holistic approach to supporting victims. By including PCCs within the scope of the duty as well as local authorities, draft Bill will contribute to ensuring that all victims of domestic abuse can access the support they need to become safe and to recover. However, the lack of a duty to impose new support functions will inevitably result in a lack of community-based or specialist support services for all victims of domestic abuse, including children who are now recognised as victims in their own right under the Domestic Abuse Act 2021.

The Victims' Bill must impose a duty to provide community-based specialist services that support and reduce risk for all victims of domestic abuse. This must include community-based perpetrator responses for a range of a wide range of harm and risk levels.

Perpetrator interventions are a key component of victim services as they address the root of the problem, hold perpetrators to account for their behaviour and provide opportunities to change. Evaluations reviewing effectiveness of domestic abuse perpetrator programmes have reviewed the impact on survivors' safety and freedom. Survivors have told us that perpetrator interventions significantly reduced physical and sexual violence and were also effective in reducing controlling behaviours. Respectful communication improved, children were safer, healthier and happier, and survivors felt safer and had more space for action.¹

¹ [Project Mirabal | Final report](#)

It is vital that community-based services are placed on the same statutory footing as accommodation-based services. We recommend the Victims' Bill strengthens the current duty to collaborate so that it requires local bodies to commission specialist domestic abuse support services for all persons affected by domestic abuse, with an accompanying package of appropriate funding.

High-quality perpetrator programmes have a huge role to play in reducing risk and increasing safety for victims and survivors of domestic abuse. As outlined in the Respect 2017 Standards for Perpetrator Work, for a programme to be effective it must have a dedicated and funded victim-survivor support element that meets their individual needs.

The Victims' Bill must impose a duty that all domestic abuse perpetrator interventions are commissioned with a high-quality and trauma-informed victim support service as an integral element. All elements should be quality assured.

Failure to ensure the quality and safety of both responses will put victims at risk. There is no mention throughout the draft Bill of the vital importance of commissioning victim support services as an intrinsic part of quality perpetrator interventions. PCCs need clear quality assurance and standards guidance so that they only commission safe, effective domestic abuse perpetrator work

The Drive intervention is always commissioned alongside a dedicated victim support element, principally in the form of IDVAs but also other services where appropriate who work to ensure that the intervention is having a positive effect on and reducing risk for victim-survivors.

Excerpt from Drive intervention case study written by a Case Manager

“When the service user was in custody Prison security intercepted a letter that he had tried to send to the victim via his cellmate. The Drive Case Manager liaised with the prison to request full details on the content of the letter as it was believed that this would give insight into the service user’s feelings toward the victim and his intentions upon release and this would inform the safety and intervention plans. It was clear from the wording of the letter that he did not accept the end of the relationship and intended to pressure the victim into resuming the relationship. This information was also shared with the IDVA and the victim-survivor was advised of the service user’s mindset and intent. This allowed her and the IDVA to safety plan accordingly.”

Perpetrator interventions that work closely with IDVA services allows for opportunities to disrupt opportunities for abuse and encourage long-term safety planning for victim-survivors in conjunction with the work of other services such as housing and substance misuse services. As outlined in response to question 10 all perpetrator interventions should be quality assured with an integrated victim support element.

Excerpt from Drive intervention case study written by a Case Manager

“A potential hidden victim was identified in the form of the service user’s ex-partner. Enquiries made and confirmed that the ex-partner is not open to the IDVA service but is currently being supported by a victim service for low and

medium risk victims. Drive Case Manager (CM) made contact with the allocated victim support worker who advised that the ex-partner continues to be harassed by the SU and is trying to move home to get away from him but was having trouble with the local housing provider. CM contacted the housing provider and argued that if the victim is at risk from a high-risk perpetrator then by definition she must be at a high risk of harm and requested that this be taken into account when considering her level of housing need/priority, which is now being reviewed by senior managers.”

There is a need to increase leadership steer and priority setting within community-based service provision in policing areas on meeting the needs of all communities and victims-survivors. This includes investment in culturally responsive interventions and investment in and support for a diverse workforce. This element needs to be considered in inspectorate and policing assessments of performance, which should themselves include a diverse range of victim-survivor views as described above.

We recognise the challenges for local commissioners in identifying and funding small, hyperlocal or highly specialist services, **so recommend a national commissioning framework with a national, ring-fenced funding pot to ensure these vital services are supported, with a grant fund allocated specifically to PCCs to commission for groups likely to be less visible to, or appropriately served by, larger or more mainstream services.**

Alongside the need for investment in community-based service provision is the need for a workforce that is reflective of the communities and victims served. Mainstream domestic abuse services, particularly perpetrator services, tend to be predominantly White, especially in leadership positions. This creates gaps in understanding experiences of racialised communities and impacts on recruitment where practitioners or leaders from racialised communities may not want to work in unrepresentative organisations or have a negative experience when they do². 2021 the Drive Partnership conducted focus groups and interviews with professionals from racialised communities who worked with those that use harmful behaviours. Staff expressed experiences of institutionalised racism, isolation and a lack of internal support which led to strong impacts on their mental health.

The Bill must include guidance for commissioners on ensuring adequate investment in a community-led workforce and leadership development programme for racialised communities that will help support domestic abuse services to be representative and effective for the communities they serve.

It is crucial that **commissioners build appropriate allowances in budget and timescale for relationship-based commissioning of by and for domestic abuse services, including perpetrator response services, to allow equitable access to services for minoritised communities.** PCCs need additional levers and ringfenced funding to support accessibility mechanisms for smaller organisations who often are unable to access quality assurance programmes due to a lack of funding and/or capacity.

² <http://driveproject.org.uk/wp-content/uploads/2021/07/CTA-briefing-responding-effectively-for-racialised-communities.pdf>

Whether the steps outlined by the Government will lead to increased awareness and effectiveness of the ISVAs and IDVAs?

We join SafeLives in welcoming the introduction of a statutory definition of Independent domestic violence advisors (Idvas) and the flexibility included in the draft definition, as any statutory definition will need to encompass the various specialisms which Idvas may hold.

In order that the definition fully achieves the potential benefits outlined above, we would urge the Government to support and bolster our definition of the Idva role (below), developed over many years through our work with thousands of domestic abuse survivors, and updated in light of the evolution of the role since its inception.

An Independent Domestic Violence Advisor (Idva) is a specialist professional who works with a victim of domestic abuse to understand and address their risk of being harmed.

Idvas receive specialist, accredited training and hold a nationally recognised qualification. They are independent and this independent status allows them to advocate for a victim of domestic abuse.

Idvas provide a primary point of contact for a victim of domestic abuse, developing relationships built on trust and accountability to pro-actively create and implement plans which address immediate safety concerns for victims of domestic abuse. These plans include practical steps, information and actions from-multi agency meetings to protect victims of domestic abuse and their family, as well as any sanctions and remedies available through the criminal, family, and civil courts, housing options, and services available through other organisations. Idvas support victims of domestic abuse and work to put them on the path to long-term safety, including coordinating the response of a multi-agency system to the victim's needs.

They are usually based within Domestic Abuse services, including 'by and for' services, or other specialist victim support and safeguarding services, or co-located in frontline agencies.

We recommend that this definition is made statutory in the Victims Bill.

A key barrier to Idvas is a lack of coverage and of funding for the roles. Therefore, in order for the Victims Bill to increase the effectiveness of Idvas, there must be sustainable funding alongside. SafeLives' most recent data highlights that there is only 66% of the required number of FTE Idvas in England and Wales to meet the needs of victims at the highest risk of serious harm or murder.¹⁰ *This level has fallen for the first time since 2016.*

Whether there should be any further measures included in the Bill?

The Drive Partnership welcomes the new duty placed on each local criminal justice body and PCCs to take into account the experiences of victims in the area as far as it is possible to do so in order to keep under review their compliance with the Victims' Code (see page 32 Clause 5 subsection (4)). **It is crucial, however, that mechanisms used to gather feedback must be accessible to all victims, including those from minoritised communities.** The Drive Partnership supports recommendations from HMICFRS that

police forces should have a range of communication methods available for victims to choose from, and that online methods ‘should immediately introduce an effective supervision and monitoring framework’. The framework should assess the suitability of such contact methods, ensuring that victim needs are at the forefront of decisions around their use and appropriate onward action is taken in all cases³.

The Drive Partnership believes that all victims of domestic abuse should have equal access to justice and support. This is why we support the Latin American Women’s Rights Service and the Step Up Migrant Women Campaign in their call to **amend the Bill to include a complete firewall between statutory services and Immigration Enforcement**. This will allow migrant women survivors to report crime and access support safely in the knowledge that statutory services are unable to share their personal data with Immigration Enforcement.

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³ <https://www.justiceinspectors.gov.uk/hmicfrs/wp-content/uploads/review-of-policing-domestic-abuse-during-the-pandemic-2021.pdf>