

## **Women's Aid Federation of England's Response to the Women & Equalities Select Committee's Inquiry on the role of the GEO**

Women's Aid is the national charity working to end domestic abuse against women and children. We are a federation of over 170 organisations which provide just under 300 local lifesaving services to women and children across the country. Over the past 47 years, Women's Aid 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.

Our support services, which include our Live Chat Helpline, the Survivors' Forum, the No Woman Turned Away Project, the Survivor's Handbook, Love Respect (our dedicated website for young people in their first relationships), the national Domestic Abuse Directory and advocacy projects, help thousands of women and children every year.

We welcome the opportunity to respond to the Women & Equalities Select Committee's inquiry on the role of the GEO: embedding equalities across government. Whilst the broad function of the GEO relates to social equality, the unit has a number of priorities and due to our area of expertise our response focuses on the GEO's priority to prevent domestic abuse and violence against women and girls (VAWG).

### **The structure and function of the GEO and its location in the Cabinet Office: how effectively does this enable it to support cross-departmental work on equalities, including the collection and analysis of equalities data?**

The function of the GEO is to embed social equality across government, and it is therefore crucial for the unit to have oversight of all government work. Women's Aid supports a structure and a location which will best achieve this, and the unit's location in the Cabinet Office makes sense in this regard. However the rationale for this and the unit's power and oversight over other departments could be made significantly clearer. The work being undertaken by the GEO to tackle inequalities across government departments also remains unclear, and on this basis the current model needs significant improvement. Over the past five years, our experience has been one of limited engagement with GEO, with the department not taking a leading role in coordinating government action to end violence against women and girls – which is a key form of discrimination against women. We're aware that there a number of staff have been seconded to other government departments in response to the COVID 19 pandemic, and this, in our experience, has limited the involvement of GEO in the response to VAWG during the pandemic.

Whilst the GEO collects certain data, such as the gender pay gap, it fails to ensure government departments and non-ministerial departments such as the Office for National Statistics (ONS) collect data on crucial factors which are at the heart of key inequality issues. For example, the recent prevalence estimates published by ONS estimated there were 1.6 million female victims and 757,000 male victims in the year ending March 2020. However, men and women's differences in experiences of domestic abuse are much more polarised than these prevalence estimates suggest. These estimates obscure the real gendered nature of domestic abuse because they do not consider the following important factors: context; impact; and repeat victimisation. Consistent and comparable data collection on VAWG continues to remain poor across governments and public sector agencies – resulting in a distorted picture of the scale of male violence and undermining an evidence-based understanding of VAWG.

## Written evidence submitted by Women's Aid Federation of England [GEO0007]

It is important to understand that men do not experience domestic abuse or other forms of interpersonal violence as part of embedded, structural inequalities against their sex. For women, however, domestic abuse is deeply rooted in inequalities between women and men. It is also important to consider how other forms of inequality intersect with gender inequality to affect a woman's experiences of domestic abuse. Structural inequalities also cause the barriers and discrimination often faced in accessing support and justice by Black and minoritised survivors, LGBT+ survivors, disabled survivors and older and teen survivors. Structural inequalities are also manipulated by perpetrators, as they strive for power and control over their partner. We would welcome more focus from the GEO on consistent data collection on VAWG (including the sex of the victim and perpetrator, and their relationship) and robust data collection on all factors which are linked to inequalities – such as race, ethnicity, disability, sexuality and gender identity.

### **The GEO's role in supporting compliance with international obligations including the UN Conventions and Sustainable Development Goals.**

The Government signed the Istanbul Convention<sup>1</sup> in 2012 to reaffirm the UK's strong commitment to tackling VAWG. The Convention consists of 81 articles aimed at tackling VAWG which focus on prevention, protection of victims, prosecution, and integrated policies, however the UK has not yet ratified the Convention. Whilst provisions in Northern Ireland and extraterritorial jurisdiction are delaying ratification, we're clear that even once these are delivered the UK will not be compliant with the Convention as survivors are still being regularly turned away from specialist support and the government have not introduced measures to ensure migrant women have full and equal access to protection and support.

The Step Up Migrant Women Coalition<sup>2</sup>, led by the Latin American Women's Rights Service, has been campaigning for changes to the Domestic Abuse Bill for migrant women that would make the UK compliant with Istanbul Convention. The measures include extending the eligibility of the Destitute Domestic Violence Concession (DDVC) to all migrant women experiencing or at risk of abuse for at least six months; a non-discrimination principle in the Bill in line with Article 4(3); and ensuring migrant survivors are able to report abuse safely to the police without fear of their details being shared with immigration enforcement.

The status of progress on Articles 4(3) and 59 is designated as "Under Review"<sup>3</sup> pending outcomes of the Home Office's Support for Migrant Victims pilot scheme. The Step Up Migrant Women Coalition and specialist led 'by and for' organisation have made it clear that this scheme is not necessary<sup>4</sup>, will not address the wider issues migrant women face in securing long-term stability, and simply lead to a unnecessary delay to making legislative changes to the Domestic Abuse Bill which have earned widespread, cross-party support. A delay that will continue to make it difficult for migrant survivors to escape abuse and which will mean the UK will remain uncompliant with the Istanbul Convention.

The Istanbul Convention also 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". A gendered definition is crucial to guide effective and safe responses that meet survivors' needs. Whilst the government have stated that the gendered nature will be acknowledged in the Domestic Abuse Bill's accompanying statutory guidance, we're clear that the statutory definition must be amended to acknowledge this too. This is also in line with the UK's commitments under other international law including Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and the UN Convention on the Rights of Persons with Disabilities (Article 16).

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<sup>1</sup> Council of Europe Convention on preventing and combating violence against women and domestic violence, Article 6.

<sup>2</sup> <https://stepupmigrantwomen.org/>

<sup>3</sup> <https://www.gov.uk/government/publications/ratification-of-the-council-of-europe-convention-on-combating-violence-against-women-and-domestic-violence-progress-report-2020>

<sup>4</sup> <https://southallblackisters.org.uk/wp-content/uploads/2021/01/SBS-and-LAWRS-joint-response-to-the-Migrant-Victims-of-Domestic-Violence-Review.pdf>

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This is also why we have serious concerns about the government's recent announcement that they plan to create a Domestic Abuse Strategy, separate from the long-established cross-government VAWG Strategy. This plan will undermine a human rights-based approach to tackling violence impacting women, undo decades of work to build understanding about the drivers of VAWG (women's inequality) and ensuring a coordinated, consistent response. As highlighted above, the UK government is party to a number of international treaties and conventions which make very clear that states must deliver a coordinated response, and integrated measures, to ending VAWG.

### **The role of Minister for Women and Equalities: what does it mean for this to be a dual-departmental role? How robustly does it champion equalities across Government?**

In principle, the fact that the role of Minister for Women and Equalities is dual-department is not a concern as this should support the cross-departmental work of the GEO. However, in our experience, this is currently not delivering effective cross-departmental work in practice. As highlighted in our response to question one, there needs to be more clarity and oversight with regards to the work of the GEO and how it works to coordinate other government departments' response to inequalities. As we detail in our responses to questions two and four, there are also significant areas where the unit is currently failing to champion equalities and to tackle underlying inequalities.

### **The GEO's role in highlighting the numerous equalities issues which have been exacerbated by the pandemic.**

It is widely evidenced that women and girls are at increased risk of various forms of VAWG, including domestic abuse, during health crises<sup>5</sup>. It was predictable that 'lockdown' measures would increase women's risk of physical and emotional harm, and close down their access to support and safety<sup>6</sup>. More widely, the pandemic is deepening pre-existing inequalities in society – meaning different groups are being disproportionately impacted.

Analysis of Women's Aid's Survivor Survey on COVID 19<sup>7</sup>, and the experiences of women contacting our members and direct services, identified that abuse has escalated and it is harder for survivors to leave. Barriers to support are even more acute for women facing intersecting forms of oppression. Women with insecure immigration status fear reporting and seeking help, and engaging in the Test and Trace system, due to legitimate concerns about their details being shared with immigration enforcement, and migrant women with no recourse to public funds (NRPF) continue to be excluded from many forms of statutory support altogether<sup>8</sup>.

Services led 'by and for' Black and minoritised women have reported needing to support survivors in understanding government guidance, and because of increased racism during this time. Much of the government's guidance and announcements on COVID 19, and information about accessing support, continue to be inaccessible to women facing additional barriers due to race and ethnicity, language, migrant status, and disability. In addition, some of the regulations and systems established to control the virus are having unintended consequences for survivors.

Despite these issues, in our experience the GEO has been absent in the response to VAWG during the pandemic. The designate Domestic Abuse Commissioner throughout the pandemic has hosted calls between government departments and VAWG organisations, which have been a crucial space to highlight key concerns and respond quickly to emerging situations. VAWG organisations have invited highlighted the lack of presence of the GEO on the calls, however this has not been addressed as the unit have continued to be absent from these discussions.

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<sup>5</sup> Fraser, E. (2020). Impact of COVID-19 Pandemic on Violence against Women and Girls. VAWG Helpdesk Report 284. DFID.

<sup>6</sup> Fraser, E. (2020). Impact of COVID-19 Pandemic on Violence against Women and Girls. VAWG Helpdesk Report 284. DFID

<sup>7</sup> Women's Aid. (2020) A Perfect Storm: The Impact of the Covid-19 Pandemic on Domestic Abuse Survivors and the Services Supporting Them. Women's Aid.

<sup>8</sup> More than half of women surveyed by Kings College London and Latin American Women's Rights Service, reported they felt they would not be believed by the police because of their immigration status (54%), with more than half feeling that the police or the Home Office would support the perpetrator over them (52%). - Kings College London and LAWRS (2019). The Right to be Believed. Available [online](#)

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In June 2020, the Prime Minister held a Hidden Harms Summit focused on ensuring those at risk from abuse and exploitation. The Summit included three sessions, but none included a representative from the GEO. There were also no representatives from other key departments such as Department for Work and Pensions, which highlights the current failings on the GEO in ensuring these issues are truly dealt with across the whole of government. In addition, VAWG sector organisations delivered comprehensive recommendations<sup>9</sup> for the Hidden Harms action plan resulting from the summit however only a few have been acted on.

### **The inquiry will also consider the new approaches and initiatives which Minister for Women and Equalities Liz Truss announced in her speech on fighting for fairness at the Centre for Policy Studies on Dec 16 2020, including the implications of the GEO taking on sponsorship of the Social Mobility Commission.**

The speech given by the Minister for Women and Equalities in December 2020 was a key opportunity to understand GEO's aims and direction in tackling inequalities, which have been severely exacerbated during the pandemic. Women's Aid was therefore not only disappointed that VAWG as a cause and consequence of women's inequality was not even referenced, but concerned by a number of statements made by the Minister during her speech which have the potential to impact the government's response to equalities. The following highlighted statements were of particular concern:

*"It will reject the approach taken by the Left, captured as they are by identity politics, loud lobby groups and the idea of 'lived experience'."*

Women's Aid firmly believes that experts by experience – which, in our work, are survivors of domestic abuse – should be at the heart of government policy making to ensure it reflects people's lived experiences. The importance of this is evident through the inclusion of experts by experience in both government departmental work and other statutory bodies, for example; the Secretary of State for Justice's Victims Panel and the CPS's specialist victim advisor for the Rape Review. In addition, Parliamentary Select Committees and Bill Committees seek both written and oral evidence from experts by experience in their analysis and evaluation of proposed measures put forward by government.

*"It will focus fiercely on fixing geographic inequality addressing the real problems people face in their everyday lives, using evidence and data."*

Women's Aid has long campaigned to highlight the postcode lottery of support for specialist domestic abuse services in all regions across the country. Even before COVID 19, the national network of refuges faced a funding crisis; 57% of referrals to refuges were declined in 2019-20 and one in five of referrals were refused because the refuge had a lack of space or capacity to support the survivor<sup>10</sup>. The number of refuge spaces in England is now also 30% below the number recommended by the Council of Europe<sup>11</sup>.

55% of services were running an area of their domestic abuse service without dedicated funding<sup>12</sup>, and many more are 'not-commissioned'. These services, who tend to be smaller and include specialist services led 'by and for' Black and minoritised women, are essential for meeting survivors needs but continue to be financially insecure. As they rely heavily on fundraising for income they have been particularly hard hit by the impact of COVID 19.

The funding crisis facing refuges has devastating consequences for survivors; just under 40% of women we supported who were struggling to access refuge in 2020 were forced to sofa-surf or sleep rough while they waited for a space<sup>13</sup>. Black and minoritised women, women with no recourse to

<sup>9</sup> <https://www.womensaid.org.uk/wp-content/uploads/2020/06/Action-Plan-VAWG-Sector-Recommendations-Final.pdf>

<sup>10</sup> Women's Aid. (2021) The Domestic Abuse Report 2021: The Annual Audit, Bristol: Women's Aid.

<sup>11</sup> Women's Aid (2020) The Domestic Abuse Report 2020: The Annual Audit, Bristol: Women's Aid.

<sup>12</sup> Women's Aid. (2021) The Domestic Abuse Report 2021: The Annual Audit, Bristol: Women's Aid.

<sup>13</sup> Women's Aid (2020) Nowhere to Turn 2020 – Findings from the fourth year of the No Women Turned Away project, Bristol: Women's Aid

## Written evidence submitted by Women's Aid Federation of England [GEO0007]

public funds (NRPF), Deaf and disabled women, women with mental health and substance use needs and LGBT+ survivors continue to face significant barriers to accessing refuge.

Whilst we welcome the legal duty on local authorities to deliver support to survivors of domestic abuse in “accommodation-based services” in the Domestic Abuse Bill currently going through Parliament, we continue to have significant concerns that the detail of the duty will not fix the crisis facing refuge services without further reform.

*“We will move well beyond the narrow focus of protected characteristics”*

Protected characteristics and intersectional approaches are crucial tools for understanding inequalities and structural forms of oppression. To eliminate violence against all women and girls we have to address how violence differs between groups of women, because how women and girls experience violence – and access support, safety and justice – is different. Their experiences will differ according to their background, access to resources, the sectors in which they work and many other factors that define their participation in society. Whilst all women are affected by patriarchy, inequality and discrimination, some women will be affected disproportionately due to their race, ethnicity, sexuality, gender identity, disability, age, class, immigration status, caste, nationality, indigeneity, linguistic minority, and faith<sup>14</sup>. Consequently, in order to achieve equal access to protection and support, the response needed must reflect the different experiences and needs of women and girls. Without this “intersectional lens”, efforts to tackle violence towards women are likely to just end up perpetuating inequalities.

Furthermore, it is well evidenced that domestic abuse is a gendered crime, and a form of violence against women and girls (VAWG), which is deeply rooted in the societal inequality between women and men. The UK government is already signatory to a range of international treaties and conventions that define domestic abuse as a form of gender-based violence<sup>15</sup>. All survivors, regardless of gender or sexual orientation and any other protected characteristics, must be able to access support that they need. Treating men and women equally, however, does not mean treating them the same: for example, women are significantly more likely to experience the pattern of controlling and coercive behaviour and therefore much more likely to need specialist support services, especially refuge services. Failing to recognise the gendered nature and impact of domestic abuse ‘gender neutralises’ discussion on domestic abuse, with far reaching consequences.

*“Second, by concentrating on data and research, rather than on campaigning and listening to those with the loudest voices.”*

In recent years there has been increased focus on VAWG policy from departments such as the Home Office and Ministry of Justice. Women’s Aid of course welcomes this, however despite the number of consultations the VAWG sector has undertaken and the data and expertise we have shared, our input has often been disregarded or the consultation has been tokenistic.

In our experience, those seeking to influence government policy on the basis of evidence and expertise are often side-lined, and government decisions are not always based on data, research and evidence and best practice. This is evident through the announcement that the government have decided to fragment domestic abuse from the VAWG Strategy without any clear evidence, rationale or consultation process. This approach ignores the long-established research and evidence base on VAWG<sup>16</sup> and the UK’s international obligations. It will wrongly separate domestic abuse from the forms of violence against women and girls which disproportionately impact Black and minoritised women, including so called ‘honour based’ abuse, forced marriage, and FGM – ignoring the clear evidence base that these forms of VAWG often occur in a domestic context. Organisations led ‘by and

<sup>14</sup> Imkaan (2018) From the Margin to the Centre: Proposal for an Alternative Bill addressing Violence Against Women and Girls. Available [online](#)

<sup>15</sup> The Council of Europe Convention on preventing and combating violence against women and domestic violence (The Istanbul Convention); The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW).

<sup>16</sup> EVAW (2011) A Different World is Possible: Promising practices to prevent violence against women and girls. Available [online](#)

for' Black and minoritised women have highlighted that the separation of the strategies will undermine their work in supporting survivors of all these forms of VAWG in an integrated way<sup>17</sup>.

There are also serious concerns that a separate strategy will continue the dangerous 'gender-neutral' response to domestic abuse, which fails to meet the needs of all survivors – both male and female. Whilst both men and women may experience incidents of inter-personal violence and abuse, research and evidence show clearly that women are considerably more likely to experience repeated and severe forms of domestic abuse, and are more likely to have experienced sustained physical, psychological or emotional abuse, or violence which results in injury or death<sup>18</sup>. Gender-specific services that respond to the specific experiences and support needs of women experiencing domestic abuse are essential, yet they are continually under threat from gender-neutral local strategies, commissioning and funding practices that lack an evidence base. Furthermore, 'gender-neutral' commissioning decisions can result in local authorities requesting a proportion of budgets currently for women's services, which have already faced years of budget cuts, to support men. This has resulted in some of our member services devoting increased proportions of their income to advertising to and supporting male victims, despite low levels of men contacting them for help. In contrast, these services are forced to turn significant numbers of women and children away from the safe support they need<sup>19</sup>.

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<sup>17</sup> <https://southallblacksisters.org.uk/news/sbs-and-womens-organisations-alarmed-by-government-dual-strategy-vawg/>

<sup>18</sup> <https://www.womensaid.org.uk/information-support/what-is-domestic-abuse/domestic-abuse-is-a-gendered-crime/>

<sup>19</sup> Women's Aid. (2021) The Domestic Abuse Report 2021: The Annual Audit, Bristol: Women's Aid.