

Violence Against Women and Girls (VAWG) strategy 2021-2024

Written Submission by

Agenda – the alliance for women and girls at risk

Executive summary of full response

About Agenda

Agenda is an alliance of over 100 organisations working in England and Wales to build a society where women and girls are able to live their lives free from inequality, poverty and violence. We campaign for women and girls facing abuse, poverty, poor mental health, addiction, contact with the criminal justice system and homelessness to get the support and protection they need.

Introduction

Agenda, the alliance for women and girls at risk, welcomes the opportunity to respond to this consultation on the 2021-2024 Tackling Violence Against Women and Girls (VAWG) Strategy. This joint response has been coordinated by Agenda and focuses on the experiences of women and girls facing multiple disadvantage. It was developed in consultation with frontline services working with women and girls facing multiple disadvantage, as well as experts by experience in Agenda's Women's Advisory Group and Young Women's Advisory Group. This is an executive summary of Agenda's full response, which provides more detailed evidence of the prevalence of violence and abuse affecting women and girls facing multiple disadvantage; current legislation and services for tackling VAWG; and effective prevention and support.

Women and girls facing multiple disadvantage experience a combination of complex and overlapping problems. We use the term multiple disadvantage to refer to any combination of: homelessness, violence and abuse, substance misuse, poor mental health, poverty and contact with the criminal justice system. However, there are many other outcomes that are commonly related to these experiences of disadvantage, for example involvement in 'survival sex', removal of children into social care, and poor educational outcomes. For many women and girls, their experiences of disadvantage are underpinned by a history of extensive violence and abuse. Agenda research shows that women are ten times as likely as men to have experienced extensive physical and sexual abuse during their lives, with one in 20 women affected.¹ That's 1.2 million women in England alone.

1) Prevalence of violence against women and girls who are experiencing multiple disadvantage

The Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence 2011 (Istanbul Convention) to which the UK government is signatory defines violence against women as follows:

“Violence against women is understood as a violation of human rights and a form of discrimination against women and shall mean all acts of gender-based violence that result in, or are likely to result in, physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.”

Violence against women and girls (VAWG) must be understood as both a cause and a consequence of gender inequality. Analysis of data on lifetime experience of abuse and violence suggests that 84% of those who suffer extensive physical and sexual abuse as both children and adults are women.² VAWG must also be understood in relation to other, inter-related structural inequalities, such as socioeconomic and race inequalities. Women’s intersectional experiences of violence and abuse should be seen as falling along a continuum of gender-based violence, connected in their nature by unequal gendered power relations.

Women and girls facing multiple disadvantage experience disproportionate and often hidden or overlooked forms of violence and abuse. These experiences are shaped by women and girls’ intersecting identities, which can create further disproportionality and barriers to support. Because of the complexity of the issues they face, women and girls often find themselves bounced between services or excluded from accessing support. Some women even face punitive responses to the abuse they experience. Without effective interventions and support, problems can spiral with devastating consequences for women and girls, their families and the community.

A vicious cycle: VAWG and multiple disadvantage

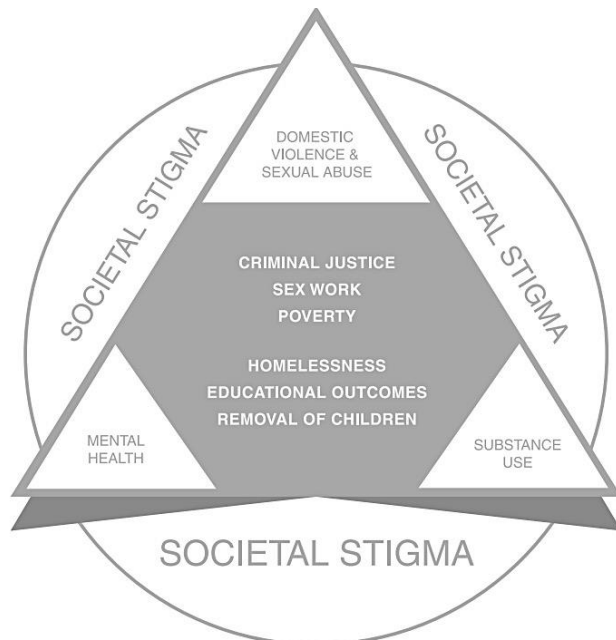
Women and girls facing multiple disadvantage often become trapped in a vicious cycle of violence abuse and disadvantage. Agenda research shows one in 20 women have experienced extensive physical and sexual violence as both a child and an adult.³ For women and girls who have faced extensive violence and abuse, sexual and physical abuse often starts in childhood and goes onto weave in and out of their lives. Just over half (51%) of women who have experienced extensive violence and abuse are living in poverty.⁴

Many women and girls who have suffered violence and abuse are deeply traumatised and go onto face multiple, complex issues. Women with extensive experience of physical and sexual violence are far more likely to experience disadvantage in many other areas of their lives. Agenda research⁵ reveals that among women who have experienced violence and abuse throughout their lives:

- 54% have a common mental health condition;
- 35% are in the lowest income tertile;
- One in three have attempted suicide;
- One in five have been homeless;
- One in three have an alcohol problem.

Women and girls are often criminalised as a result to the violence and abuse they have experienced. More than half (57%) of women in prison report having suffered domestic violence,⁶ and 53% report having experienced emotional, physical or sexual abuse during childhood.⁷ Both of these figures are likely to be significant underestimates. Between three-quarters and 90% of

girls (under 18) in the criminal justice system may have experienced abuse from a family member or someone they trusted.⁸ Research by Lankelly Chase shows that women make up 70% of people experiencing homelessness, substance misuse, poor mental health and interpersonal violence and abuse simultaneously, all of which put women at greater risk of the criminal justice system.⁹



For the final report of the [National Commission on Domestic and Sexual Violence and Multiple Disadvantage](#), Agenda and AVA worked with peer researchers who collaboratively produced this diagram to help outline what they understood multiple disadvantage to mean for women.

Many of the most negative outcomes that can result from abuse - and from attempts to escape it - increase the risk of further victimisation. For example, girls who run away from home and women who become homeless, misuse drugs or are exposed to criminality are highly likely to experience further violence in their lives.^{10 11} This creates a vicious cycle of violence, abuse and other types of disadvantage. The violence and abuse women and girls experience, and the context in which it takes place, is often hidden, overlooked or even criminalised – meaning that many women and girls are not able to access life-saving support.

Colette

“After experiencing childhood sexual abuse and emotional neglect, I spent years traumatised and without hope. It left me vulnerable to further abuse so that violent and exploitative relationships were all I had in the way of human connection.”

2) Legislative and service response and provision for women and girls experiencing violence and multiple disadvantage

This section gives an overview of the extent to which current legislation and services are being used effectively to tackle VAWG and multiple disadvantage. It is essential that understanding of how VAWG impacts on the lives of women and girls is embedded across different government departments. While Agenda has campaigned and consulted on a wide range of strategies and pieces of legislation, for the purposes of this consultation we focus on the extent to which the *Ending Violence Against Women and Girls Strategy 2016 – 2020* and the *Domestic Abuse Bill*, currently progressing through parliament, effectively address and respond to the VAWG

experienced by women and girls facing multiple disadvantage. We also identify key barriers to support in statutory and mainstream services, as identified by women, girls and the specialist services that support them.

2a) Legislation

Legislation	Objective	Progress
<p>Ending Violence Against Women and Girls Strategy 2016 – 2020</p>	<p><i>> Support improvements in responses of health professionals to VAWG for example through roll out of the IRIS programme, free online training and more firmly embedding routine enquiry into domestic abuse in maternity and mental health services. From April 2016 we will begin to introduce sensitive routine enquiry of adverse childhood experiences in a range of targeted services where people who have been abused are likely to present, for example sexual assault referral centres and sexual health clinics.</i></p> <p><i>> More victims and offenders are identified at the earliest possible opportunity, with effective interventions in place to prevent violence and abuse from escalating to a crisis point, with a reduction in high-rates of re-victimisation.</i></p> <p><i>> Women will be able to disclose experiences of violence and abuse across all public services, including the NHS. Trained staff in these safe spaces will help people access specialist support whether as victims or as perpetrators.</i></p>	<p>In 2019, Agenda conducted FOI requests to mental health trusts and found a third did not have a policy on routine enquiry.¹² This is despite NICE guidance for mental health, drug and alcohol treatment and maternity services recommending that trained practitioners routinely ask patients. Where trusts did have policies on routine enquiry the effectiveness varied considerably, with one trust asking just 3% of patients about experiences of domestic abuse – when they should be asking everyone.</p> <p>The fact that inquiry into domestic abuse is not taking place routinely in maternity and mental health settings has been acknowledged by the Government. In response to the Domestic Abuse Bill consultation in 2019, the Government stated “routine enquiry on domestic abuse already takes place in place in maternity and mental health services.”¹³ The wording in the Draft Statutory Guidance published in July 2020 has since been amended to say that it “should” be taking place.¹⁴</p> <p>To date, IRISi has only received funds from the Department for Health and Social Care (DHSC) to support the running of two IRIS programmes. This is because it was one of five organisations that made up the Pathfinder Consortium. It has not yet received any direct or sustained funding from DHSC.</p> <p>Currently, Jobcentre staff are not trained to effectively ask and respond to domestic abuse. An inquiry by the Work and Pensions Select Committee into Universal Credit in 2018 concluded that Jobcentre staff do not have the skills to respond to domestic abuse cases due to</p>

		<p>the lack of meaningful training.¹⁵ Despite announcements in July 2020 that up to 600 Jobcentre Work Coaches will receive domestic abuse training, this must go much further. The thousands of staff in DWP, Jobcentres and local authority teams administering Universal Credit must receive robust training on domestic abuse – particularly in delivering safe routine inquiry, robust data collection and providing effective support and referral.</p>
	<p><i>> Areas routinely have a VAWG partnership, rigorous needs assessment and local strategy with VAWG considered in line with drug and alcohol services, homelessness services and children’s services to ensure wrap-around support for victims and their families.</i></p> <p><i>> Better access to integrated pathways of support to meet the needs of victims experiencing multiple disadvantages.</i></p>	<p>Current guidance suggests far more support is available for wraparound services than is the case. Research by Agenda and AVA in 2017¹⁶ found that:</p> <ul style="list-style-type: none"> • All but nine (out of 173) local authority areas across England and Wales are home to at least one type of support for substance use, mental health, homelessness or offending. However, in only nineteen areas in England (none in Wales) do women have access to support for all of these issues. • Just under half of all local authorities in England and only five unitary authorities in Wales report substance use support specifically for women. • Support specifically for women experiencing mental distress was identified in 104 English local authorities and five Welsh unitary authorities. Most mental health support identified is for pregnant women or women who have recently given birth. • Only 57 local authority areas of England and two unitary authorities in Wales were found to provide women-only accommodation that is not a refuge.
	<p><i>> Support female offenders who are victims of violence and abuse to receive the interventions they need to stop offending and move into recovery for example by considering the models under development in Greater</i></p>	<p>The Ministry of Justice 2018 Female Offender Strategy, which received cross-party support, commits to investing in community-based support which helps address the root causes of women’s offending behaviour, including violence and abuse, and reduce reoffending. However, despite some government funding, the vital women’s specialist services needed to support</p>

	<p><i>Manchester, Wales and London.</i></p>	<p>women at risk of offending remain underfunded and facing a precarious future. Furthermore, the aims of diverting women from custody are undermined by the recent Government announcement that £150 million will be invested in building 500 new prison cells for women.</p>
	<p><i>> Launch a new funding programme to develop and promote new forms of forms of services for victims with the most complex needs.</i></p>	<p>Progress has been made by the Ministry for Housing, Communities and Local Government to fund domestic abuse projects where supporting survivors with complex needs was a key criterion.¹⁷ However, women and girls experiencing VAWG and multiple disadvantage experience many types of VAWG - not only domestic abuse. More progress is needed to embed a gendered understanding of multiple disadvantage across the department’s policy and funding programmes.</p> <p>For example, the recently launched MHCLG Changing Futures prospectus does not make any reference to gendered experiences of multiple disadvantage. The only case study to feature in the prospectus is a man’s experience of multiple disadvantage.</p> <p>Women and girls’ complex needs and experiences of multiple disadvantage are significantly different to men and boys’ experiences.¹⁸ For many women and girls, their experiences of disadvantage are underpinned by a history of extensive violence and abuse. Most services addressing multiple disadvantage are designed for men by default, in part because more men tend to access these in larger numbers. These male-dominated environments can be intimidating and unsafe for women, and are rarely set up to meet women’s distinct needs. Without specifying the need for gender-specialist support, the £46 million Changing Futures fund - and future funding, are at risk of being funnelled to gender-neutral services which mainly serve male service-users.</p>
<p>Domestic Abuse Bill</p>	<p><i>> Make domestic abuse ‘everyone’s business’</i></p>	<p>The Domestic Abuse Bill is a central piece of legislation to effectively tackle VAWG.</p>

<p>(currently progressing through parliament)</p>	<p><i>> Drive consistency and better performance in the response to domestic abuse across all local areas, agencies and sectors.</i></p>	<p>Unfortunately, there is little currently in the Bill that directly references and responds to the abuse experienced by women facing multiple disadvantage.</p> <p>A key recommendation in the final report of the National Commission on Domestic and Sexual Violence and Multiple Disadvantage was that enquiry into current and historic domestic and sexual violence should be standard practice across publicly funded services supporting women experiencing multiple disadvantage, supported by robust policies, staff training and accurate data collection.¹⁹</p> <p>As at February 2021, Amendment 53 to the Domestic Abuse Bill – which would place a statutory duty on public authorities to train frontline public services staff to make enquiries into abuse has not been adopted by the Government. This is despite the Minister stating “the Government are in full agreement with [the amendment’s] aims” at Committee Stage in the House of Lords.²⁰</p> <p>Agenda supports a number of campaigns to amend the Bill that would better respond to survivors of domestic abuse experiencing multiple forms of disadvantage.²¹</p>
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2b) Services

An overarching theme in statutory and mainstream service-response to women and girls experiencing violence, abuse and other forms of disadvantage is a distinct lack of understanding of their trauma and the ways in which their complex needs overlap. There is currently a lack of gender-, age, and trauma-informed support available to women and girls in statutory and mainstream services. Pockets of good practice means women and girls face a postcode lottery in support.

Barriers to support include:

Lack of understanding across public services of what having multiple complex needs means for women and girls experiencing violence and abuse, including police officers; prison and probation staff; court staff, including judges; children and adult’s social workers; healthcare professionals;

Jobcentre staff; and housing officers. This lack of understanding can lead to women and girls being blamed for the abuse they have experienced, or being subjected to retraumatising measures, such as having their children removed. Language barriers and a lack of appropriate interpretation services can also exclude women and girls from being able to access support,²² making it more likely they will be failed by the system and have their children taken away.

Lucy, 19

“Just in general – like, when I was abused... [...] I had a social worker and I felt like a lot of the blame was put on to me [...] There was some incidents where I was arrested – not through any fault of my own but because, like, I was abused and then would retaliate just to try and get the person who was abusing us off us and things.”

Difficulty accessing services and siloed approaches. The lack of specific services for women and girls experiencing multiple disadvantage usually leads to them being excluded by one service, which then results in exclusion from the other services they need. For example, if they are using substances, they cannot access refuge; but without a refuge space or safe housing it is very difficult to begin addressing substance misuse problems. Research by Agenda and Ava, *Mapping the Maze*, shows the paucity of holistic support available for women and girls,²³ with local commissioning models often exacerbating siloed approaches. Migrant survivors of violence and abuse with No Recourse to Public Funds (NRPF) often do not have the financial resources to access safe accommodation and legal aid, leaving them and their children at increased risk of homelessness, exploitation and destitution.

Marie, 23

“I was disheartened because I felt I did need professional support but because of where I was, because I wasn’t in [home city], it all just messed with the support I could receive. I just felt like that wasn’t good. I think offering ongoing support [is important].”

Fear of sharing their story in order to access services. Often services lack understanding that most women and girls have experienced complex trauma and PTSD, or that asking for help can take years. If and when women and girls do find the strength to bravely disclose, sometimes they aren’t listened to. It can be retraumatising when women and girls do not get the help they need. Women and girls may also fear taking the help available. For example, a woman may be afraid of accepting a refuge space when using substances or alcohol, because if found out, she could face yet more punitive responses, such as being excluded from that service. Women and girls may also be asked to share their story repeatedly, and be forced to relive their trauma, with multiple professionals. Migrant women with insecure immigration status may fear disclosing violence and abuse for fear of deportation, due to the current lack of safe reporting mechanisms.²⁴

Lack of age-appropriate support for girls. With models of youth provision regularly built around young men’s lives and all key youth funding announcements since 2018 ‘gender-neutral’, youth services are limited in their ability to deliver gender-responsive support.²⁵ Teenage girls aged under 16 who experience abuse in their own intimate relationships are rarely recognised as a group impacted by domestic abuse. Research from The Children’s Society’s found that just 39% of local authorities provide a specialist support service for under 16s, with 26 local authorities

providing no specialist support nor any additional support for this age group.²⁶ Despite the high level of need for mental health support amongst girls and young women who have experienced abuse, young women are consistently less likely to access mental health treatment than older, adult women.²⁷

Kym, 19

Discussing why young women may not disclose VAWG

“I think young women may feel more judged or like you're just being misunderstood or not knowing what you're talking about.”

The women and girls' voluntary sector is overstretched and under-resourced. Many women's and girls' specialist services are regularly at risk of closure due to lack of secure funding. Interim research by Agenda during the Covid-19 pandemic found that nearly half (46%) of organisations supporting women and girls facing multiple disadvantage report that their financial position during the lockdown has worsened.²⁸ ⁱ There is no central strategic overview of provision for women and girls facing multiple disadvantage, meaning that many areas of the country are not covered by these services. Funding is often short-term, meaning services are unable to plan for the future and staff are at constant risk of redundancy.²⁹ Competitive tendering processes favour large generic service-providers who lack specialist knowledge and, due to their size, do not tend to work with specialist services as equal partners. Women and girls' organisations often struggle to win funding for a range of reasons, including lack of capacity to write bids and their specialism not recognised in eligibility criteria. Specialist services run 'by and for' the communities they serve, such as Black and minoritised women, LGBTQ+ women, disabled women and migrant women are particularly disadvantaged by current commissioning frameworks.³⁰

Lucy, 19

“I think things have moved forward with the support and stuff but I just don't feel like it's enough still. Like, where I live, as far as I know, there's only one service that offers support for domestic violence [...] I obviously attended there, it was literally ran by three people. [...] Obviously three people in comparison to the amount of people who go through domestic abuse isn't a lot of people.”

3) Prevention and support

For women and girls facing multiple disadvantage to get the support and protection they need, the VAWG Strategy must:

1) Sustainably fund the women and girls sector

- The VAWG strategy must be delivered alongside a **secure, national multi-year funding settlement** for organisations supporting women and girls facing multiple disadvantage.

ⁱ Updated evidence in the recent months of the pandemic is forthcoming.

- This must prioritise funding for specialist organisations with a track record of delivering **gender-, age- and trauma-informed** services to survivors facing multiple disadvantage.
- All public funding for VAWG support should **promote women-centred, trauma-informed, needs-led, holistic, accessible and wrap-around support** services as the sustainable way of addressing intersecting need and preventing further repeat victimisation and exposure to further risk.
- This must include **ring-fenced funding for specialist services** led ‘by and for’ Black and minoritised women, Deaf and disabled women and LGBTQ+ survivors.
- **A central cross-government funding pot** should be developed to invest in service redesign and incentivise local bodies to collaborate to break down silos and build better infrastructure to meet women and girls’ needs in the long-term.

Amelia, 19

“The first worker that I had – he didn’t really understand... And he was young as well, and he’s gone through that life, like jail and stuff, but he didn’t get it. He related more to boys.”

2) Advocate gendered, joined-up commissioning

- The funding for the VAWG strategy must be structured around a **comprehensive approach to addressing VAWG and multiple disadvantage**. Services should be designed and commissioned around outcomes that make a difference to women’s lives, with a long-term view to addressing issues preventatively.
- Local commissioners must **address gaps for women facing multiple disadvantage**, in particular mental health, substance use, domestic abuse and the impact of trauma.
- **Specialist organisations should be valued partners in this process**. Local boroughs must embed organisations in the commissioning process in a way that acknowledges specialist expertise especially of those ‘by and for’ led organisations.
- **Commissioners should build incentives into contracts to encourage mainstream services to work collaboratively** and ensure that specialist expertise, including that provided by the specialist women and girls voluntary sector, is prioritised.
- **Commissioning processes must involve genuine and meaningful coproduction with women and girls with lived experience** at all stages, including in developing needs assessments, shaping service specifications, scoring service tenders and sitting on tender panels, evaluating existing services and contract monitoring.

3) Invest in prevention and early intervention

- Much of the abuse experienced by women and girls could be avoided if boys and girls received **accessible, trauma-informed learning about healthy relationships and spotting the signs of abusive behaviours in schools, alternative provision and youth settings**.
- Beyond the **compulsory rollout of Relationships and Sex Education** (which must not be delayed any longer), the full implementation of a **‘Whole School Approach’** to tackling VAWG must be prioritised by Department of Education, local authorities and education providers.³¹

- Fund and support the specialist girls and young women’s sector to support earlier intervention and prevention work.

Lucy, 19

“I think just educating men and boys [...] – just educating everybody more on what domestic violence is, the impact of it, the impacts it can have on children... Just all of it really. I think schools is a good one because it kind of teaches them early.”

4) Improve public service response

The VAWG Strategy should incentivise all public services to adopt the trauma- and gender-informed standards set out in the final report of the Women’s Mental Health Taskforce, jointly authored by the Department for Health and Social Care and Agenda.³²

4a) Train frontline public services staff to ask about experiences of VAWG and respond appropriately

- It is vital that a wide range of agencies and bodies are **able to identify survivors of violence and abuse and provide the right response**. The VAWG Strategy should set out clearly the existing framework for training frontline public services staff to identify violence and abuse and respond appropriately.
- **The VAWG Strategy should establish an overarching set of principles for how all public services must respond better to VAWG**, including by training all frontline public services staff to ask about experiences of violence and abuse in a trauma-informed way, and work collaboratively to ensure the whole system can respond effectively to the needs of survivors.
- We support calls from APPEAL for enquiries to be required at **every stage of contact with the criminal justice system**, especially by police and prosecution.
- **This guidance should be developed in consultation with the women and girls sector**, including specialist ‘by and for’ services, to ensure enquiries and referral pathways are sensitive and responsive to all survivors, including those from minoritised and marginalised communities.
- It should highlight the need for **robust training standards** and **data collection** to measure the effectiveness of enquiries being made.
- All public authorities should report statistics on enquiries into VAWG and VAWG training to the **Domestic Abuse Commissioner**.

4b) Develop a comprehensive policy framework to support improved criminal justice responses to women and girls whose offending behaviour is driven by their experience of VAWG

- We echo calls from Centre for Women’s Justice that a **comprehensive cross-departmental policy framework** must be developed to make clear the link between women and girls’ experiences of **violence and abuse and their criminalisation**.
- This work must be informed by **close joint working** with women and girls’ specialist community services, with specific consideration given to the additional challenges faced by

certain groups of women and girls, including Black and minoritised women and girls, foreign national women and girls, and Deaf and disabled women and girls.

- **Learning should be drawn from models of good practice**, such as London’s domestic abuse courts, to develop specialist approaches with women defendants.³³
- This must include **ring-fenced funding for specialist women and girls’ services, and services led ‘by and for’** Black and minoritised women, Deaf and disabled women and LGBTQ+ survivors.

Amanda

“What needs to change? Well women need to be believed, they need more support and ultimately men’s behaviour needs to change. When I was in probation, it was all geared around men. You need to look at it from a female perspective.”

5) Improve data collection

- The VAWG Strategy must ensure the collection of comprehensive, comparable and **disaggregated data on VAWG, and its links with other forms of disadvantage**, across government.
- At a minimum, government data must always be disaggregated by **protected characteristics** and **immigration status** for both victim and perpetrator and their relationship.
- This data should be **centrally collated, made publicly available and presented accessibly** to allow for further analysis.

7) Be inclusive of survivors with No Recourse to Public Funds (NRPF)

- Migrant survivors with NRPF to public funds cannot be overlooked in this strategy. The VAWG Strategy must include **specific provision for migrant women with NRPF** to ensure they can access the support, welfare systems and legal tools they need to escape violence and abuse, and can safely report violence without fear of immigration enforcement.
- Any legislative reforms or new funding proposals should be consulted on with the Step Up Migrant Women Coalition.³⁴

8) Value survivor-led solutions

- Women and girls are experts in their own lives. The VAWG Strategy should advocate for women and girls with lived experience to be fully involved in decision-making processes relating to intervention and prevention measures. This includes at all stages of the design and delivery of policy, funding, programmes, governance and evaluation.
- The Strategy should also recommend that women-only peer support be commissioned and delivered as a core component of all wider interventions to support women who have experienced violence and abuse. Peer support and its value should be recognised and built into all local priorities and action plans of VAWG commissioners and practitioners.

Rachel

“To anyone who may be suffering after sexual abuse, I’d say: You are not alone, and you don’t have to suffer in silence. You might feel ashamed, but that shame is not yours. That shame belongs entirely to the person who violated you.

You can have a voice, and if you find someone you feel safe with, you can give a voice to that girl inside you who was so painfully wounded. Your truth matters, and there are people who will help you carry it.

The road to healing is not an easy one, but you’ve had the strength and courage to survive this far, so you will get through it.”

Agenda believe women and girls hold many of the solutions to the challenges they face. In recognition of this, we worked with women and girls involved in Agenda’s Women’s Advisory Group and Young Women’s Advisory Group to develop this consultation response. Their quotes are used throughout the document to illustrate the issues they raised.

This submission is supported by:

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