

# Briefing for Local Infrastructure Organisations (LIOs) on the 'crisis in Rape Crisis' and sexual violence policy drivers

**This briefing describes the policy drivers LIOs can use to ensure that sexual violence is included in local agendas, particularly Local Area Agreements which are currently being renegotiated.**

**Through raising awareness of the policy drivers and pressing for implementation, LIOs can play a vital role in assisting the Rape Crisis sector and ensuring that survivors of sexual violence have local support services that meet their needs.**

## Sexual violence

Sexual violence is a major problem in the UK. In 2005 there were over 14,000 reported rapes in England and Wales and an estimated 80,000 unreported rapes.<sup>1</sup> One in five women experience sexual assault in adulthood, and 21% of girls and 11% of boys experience sexual abuse in their childhood.<sup>2</sup> The Government has stated that "Sexual violence and childhood sexual abuse are two of the most serious and damaging crimes in our society".<sup>3</sup>

Sexual violence includes: rape; sexual assault and abuse; adult survivors of childhood sexual abuse; children who are sexually abused; incest; trafficking of women and girls for sexual exploitation; female genital mutilation (FGM) etc.

Sexual violence is overwhelmingly perpetrated by men (99% of perpetrators are male)<sup>4</sup> against women and children (who are usually known to them).<sup>5</sup>

It is recognised by both the UK Government and the United Nations that sexual violence is both a cause and a consequence of gender inequality.<sup>6</sup> In fact, almost half of all women in the UK will experience domestic violence, sexual assault or stalking in their lifetime.<sup>7</sup> This mirrors the ongoing and systematic discrimination faced by women and girls (as evident in statistics).<sup>8</sup>

Many women who experience sexual violence do not tell anyone and the vast majority do not report it to the police. In cases where rape is reported to the police, perpetrators are rarely convicted.

In 1980, one in three reported rapes ended in a conviction but in 2005, and despite rises in reporting, this dropped to 5.29%.<sup>9</sup>

There are many longterm impacts of being sexually assaulted, including negative repercussions on health, mental health, education, employment, ability to care for children, participation in society etc.

Sexual violence also has significant financial impacts on both survivors and the public purse – in 2003/04, the estimated cost of sexual offences was £8.5 billion, with each rape costing over £76,000.<sup>10</sup> However, research has shown that Rape Crisis Centres are vital in reducing the economic impacts of sexual violence.<sup>11</sup>

## About Rape Crisis Centres

Survivors of sexual violence find it very difficult to get the support they need as accessing services is a postcode lottery.<sup>12</sup>

Rape Crisis Centres are independent voluntary and community organisations which provide longterm support for women and girls, who have experienced sexual violence, and their families. The majority of centres have an annual income of £100k or (usually) less and many have no full-time paid staff.<sup>13</sup>

Rape Crisis Centres have been around for 30 years and provide services such as advocacy, face-to-face counselling, telephone counselling, telephone helplines and group sessions. They have also been at the forefront of campaigning for better legislation.

## Why is there a 'crisis in Rape Crisis'?

You may have read in the news lately that Rape Crisis Centres are facing a severe funding crisis (dubbed the 'crisis in Rape Crisis').

In 1984 there were 68 centres in England and Wales but now there are just 38 left who are members of the umbrella body, Rape Crisis (England and Wales).<sup>14</sup>

Many centres are at risk of closure (this could be as high as half of all remaining centres),<sup>15</sup> yet the demand for services is extremely high.<sup>16</sup>

The main reason why Rape Crisis Centres are experiencing such a severe funding crisis, en masse, is because, until very recently, there have been no local targets (i.e. set by central Government, for local Government) on sexual violence.

Also, decision makers and funders have not always been clear about the relationship between sexual violence and domestic violence (which does have local targets). Many women who experience domestic violence are also subjected to sexual abuse, but this is rarely reflected in people's understanding of domestic violence. Sexual violence is also a stand alone issue and survivors require specialist and tailored support which is different from domestic violence services.

As a result, local authorities and related partnerships such as Crime and Disorder Reduction Partnerships (CRDPs) and Local Strategic Partnerships (LSPs), have tended not to address sexual violence or fund services, even when lobbied by local organisations to do so.

LIOs can play a vital role in helping to champion Rape Crisis Centres. If LIOs can help to get sexual violence onto local agendas, Rape Crisis Centres will have a stronger case when approaching local authorities and partnerships for funding to provide local services.

## What are the key policy drivers that can be used to get sexual violence on the agenda?

This briefing describes three key policy drivers that can be used to get sexual violence on to local agendas:

- 1) Local Area Agreements (LAAs)
- 2) Cross-Government Sexual Violence and Abuse Action Plan (SVAAP) and the accompanying Implementation Guide
- 3) Gender Equality Duty (GED)

These drivers can be used in conjunction with each other to strengthen arguments and make the case for funding to local services, particularly in LAAs.

## 1) Local Area Agreements – relevant Public Service Agreements and National Indicators

In October 2007, the Government announced 30 new Public Service Agreements (PSAs) and a range of National Indicators (targets which will be used to measure whether local areas are meeting the PSAs).

Local authorities will be responsible and accountable for delivery on the indicators which are now the only targets that central Government will use for local Government, superseding other methods such as the Best Value Performance framework.

LSPs can choose up to 35 National Indicators to include in their LAAs (there are also 17 obligatory indicators on education and early years).

Local partnerships have until June 2008 to renegotiate their LAAs for 2008-2011, so it is crucial that third sector organisations engage with local partnerships **now** to influence the indicators.

Through encouraging local partnerships (such as LSPs and CDRPs) to include sexual violence targets in LAAs, Rape Crisis Centres will be better equipped to ensure the sustainability of their services through improved opportunities to access local authority funding.

Table 1 outlines the PSAs and targets that are most relevant to sexual violence and Rape Crisis Centres.

**National Indicator 26, under PSA23, is the most relevant target that LIOs could advocate for.**

Other related PSAs and indicators are listed that can help LIOs make the case for NI26. However, on their own, these targets are less relevant to Rape Crisis Centres and services for sexual violence survivors.

| Public Service Agreements  |  | Indicators that can be chosen for this PSA  |   |
|--|--|---|---|
| No. & title  | Notes about the PSA  | No. & title   | Notes about the indicators  |
| 23: "Making Communities Safer"   | <p>This is a new PSA which focuses on reducing crime, increasing public confidence in local crime reduction agencies and provides a framework to deliver local priorities on reducing re-offending. The Government states that the "spirit" of PSA23 is to "reduce harm" (for example, through effective support services), and local authorities and partnerships should not just focus on reducing crime.<sup>17</sup></p> <p>PSA23 is the most relevant to sexual violence and Rape Crisis Centres. There are many references to sexual violence and support services such as:</p> <ul style="list-style-type: none"> <li>○ Priority Action 1, which is the reduction of "the most serious violence, including tackling serious sexual offences and domestic violence".<sup>18</sup></li> <li>○ Local CDRPs, in partnership with Local Criminal Justice Boards (LCJBs) and offender management bodies, should be able to "demonstrate to Government Offices for the Regions that they are taking action to tackle serious sexual offences".<sup>19</sup></li> <li>○ The Government expects local areas to implement a strategy for the "the provision of effective victim care pathways to minimise harm, and consideration of the <i>gendered</i> nature of serious sexual offences", as well as increasing reporting.<sup>20</sup></li> </ul> | 26: "Specialist support to victims of a serious sexual offence"                         | <p>This indicator is the <b>most relevant</b> to Rape Crisis Centres.</p> <p>PSA23 clearly states that "<i>partnerships should consider including [NI26] in LAAs, particularly in areas where services are currently limited</i>", which is likely to be the case for most areas.<sup>21</sup></p> <p>In addition, Indicator 1 for PSA24 (see below) also includes the need for "enhanced support services for victims" whose cases are going through the criminal justice system.<sup>22</sup></p> |
|  |  | 15: "Serious violent crime rate"  | <p>These indicators are much less relevant to Rape Crisis Centres and sexual violence survivors but can be used to support the case for NI26.</p>   |
|  |  | 31: "Re-offending rate of registered sex offenders"                                     | <p>Theoretically, these indicators could benefit survivors of sexual violence and/or Rape Crisis Centres but are unlikely to do so.</p>   |
|  |  | 32: "Repeat incidents of domestic violence"   |   |
|  |  | 34: "Domestic violence - murder"  |   |
| 16: "Increase the proportion of socially excluded adults in settled accommodation and employment, education or training" | <p>There are indicators for this PSA which are linked to mental health (see across). The relationship between mental ill health and social exclusion is well documented.</p> <p>Sexual violence can have significant impacts on survivors' housing, employment and education.</p> <p>While this PSA is not directed at sexual violence, the work of Rape Crisis Centres contributes to this outcome. The inclusion of NI26 in LAAs would help to support this PSA.</p>   | 149: "Adults in contact with secondary mental health services in settled accommodation" | <p>Rape Crisis Centres provide vital mental health services (such as counselling). They also provide advocacy, practical advice and support and referrals on to other agencies. These services help women deal with the trauma and aftermath of sexual violence which, in turn, helps survivors' to obtain and maintain settled accommodation and employment.</p> <p>The inclusion of NI26 in LAAs would help to support indicators 149 and 150.</p>  |
|  |  | 150: "Adults in contact with secondary mental health services in employment"            |   |

| Public Service Agreements   |   | Indicators for this PSA  |   |
|---|---|--|---|
| No. & title   | Notes about the PSA   | No. & title  | Notes about the indicators  |
| 24: "Deliver a more effective, transparent and responsive Criminal Justice System for victims and the public" (this PSA is also known as the 'Criminal Justice PSA'). | <p>This PSA is directed at the Criminal Justice System (CJS), rather than local authorities, and represents the high level measures of success for the CJS strategy.</p> <p>Given that the conviction rates for rape are appallingly low, there are specific references to sexual violence in PSA24, for example that the CJS should improve "...the efficiency and effectiveness with which serious crime, particularly serious sexual offences, are investigated and prosecuted."<sup>23</sup></p> <p>Local Criminal Justice Boards (LCJBs) will be responsible for developing local delivery strategies which set out its plans to support the delivery of the crime strategy which will tackle serious crimes such as sexual offences.</p> <p>However, PSA 24 is closely linked with PSA23 ("Make Communities Safer") which will be delivered by local Government bodies and partnerships, particularly CDRPs. Therefore, PSA24 will require a coordinated approach between the LCJBs and local partnerships.</p> <p>There are five obligatory indicators for this PSA and four are relevant to sexual violence (see across) and can be used to support arguments for including NI26.</p> | 1: "Effectiveness and efficiency of the CJS in bringing offences to justice"                       | <p>This indicator has a focus on outcomes which reduce the harm caused, particularly "offences where convictions rates are very low, for example rape."<sup>24</sup></p> <p>The indicator goes on to state that there should be "enhanced services to support victims (particularly in relation to rape offences) and witnesses, (particularly vulnerable and intimidated witnesses) to ensure that they engage with the criminal justice process and receive better access to justice."<sup>25</sup></p> <p>This is particularly relevant to Rape Crisis Centres, especially those which provide advocacy, and NI26 (PSA23).</p> |
|   |   | 2: "Public confidence in the fairness and effectiveness of the CJS"                                | <p>With rape convictions at an all time low, Rape Crisis Centres and the women's third sector generally have been lobbying Government to address the issue, which PSA24 will (hopefully) do.</p> <p>Rape Crisis Centres provide advocacy services for women who want to report sexual violence and are an important source of support. Therefore, NI26 is directly relevant.</p>  |
|   |   | 3: "Improve victim satisfaction with the Police; and victim and witness satisfaction with the CJS" | <p>However, support services for <i>all</i> women, whether they report or not (as is more likely to be the case), should be as well resourced as strategies to increase conviction rates. Therefore, NI26 becomes even more important in ensuring this is the case.</p>   |
|   |   | 4: "Understanding and addressing race disproportionality at key stages in the CJS"                 | <p>Across CJS agencies, recording the race of women reporting sexual violence is haphazard and definitive data is very difficult to obtain. As a result, sexual violence and race are not fully understood or addressed. Although this indicator focuses on crimes where disproportionality is most obvious, it should be used to push for better race monitoring and analysis in sexual offences.</p>  |

## 2) Sexual Violence and Abuse Action Plan and Implementation Guide

The cross-Government Sexual Violence and Abuse Action Plan (SVAAP) was published in April 2007. SVAAP, and the obligations it places on local agencies, is a useful tool for strengthening arguments about the inclusion of NI26 in LAAs (and raising the profile of sexual violence generally in local areas).

One of the three key objectives of the Plan is "to increase access to support and health services for victims of sexual violence and abuse", which is closely linked to NI26.<sup>26</sup>

SVAAP makes many references to the vital and significant contribution that specialist voluntary and community organisations (such as Rape Crisis Centres) make and, more importantly, it acknowledges that many of these organisations find it difficult to access longterm core funding:

"...it is important to acknowledge that these organisations are delivering crucial mental health services. However, whilst demand for their services is high, the organisations are mostly small and find it difficult to access longterm core funding. Sustainability was identified as one of their main concerns...and it is important for the Government to work with the sector to address this issue if access to support services is to be increased."<sup>27</sup>

In addition, one of the action points in SVAAP for 2007-08 is to look at how to "increase capacity and stability in the sexual violence and childhood sexual abuse voluntary sector."<sup>28</sup>

SVAAP is accompanied by an Implementation Guide. The Guide is an *excellent resource* and describes what actions local authorities and partnerships should take, and clearly demonstrates how sexual violence 'fits' with LAAs.

In the current SVAAP Implementation Guide there are a range of actions for local partnerships including:

- Co-ordinating a local Sexual Violence Action Plan setting out how sexual violence will be tackled. This should be developed in conjunction with the sexual violence voluntary and community sector, and it should ideally link to **LAAs**.

- Establishing a local Sexual Violence Forum to oversee and monitor the local response to sexual violence. This should include the sexual violence voluntary and community sector.
- Supporting specialist voluntary and community organisations in delivering therapeutic and other support services for survivors of sexual violence, **through the provision of funding** or supporting applications for three year funding.
- Arranging multi-agency training exchanges, including commissioning training from the voluntary and community sector, to increase awareness of agencies about sexual violence.
- Raising awareness about the prevalence of sexual violence with a range of audiences.

Many Rape Crisis Centres have limited resources, which are entirely directed to their front-line services, and do not have full-time staff. This makes it difficult for them to actively engage with and influence decision makers, such as CDRPs. Also, the experiences of some Rape Crisis Centres is that their CDRPs have a narrow focus on domestic violence, making sexual violence difficult to get on the agenda.

However, local partnerships, such as CDRPs, should be proactively engaging with and enabling specialist third sector organisations, especially those with limited capacity and resources. The Guide states that "Due to significant financial constraints in this specialist sector, additional resources should ideally be made available locally to enable organisations to contribute to this work."<sup>29</sup>

If implemented effectively, SVAAP presents a real opportunity to strengthen the Rape Crisis sector and will increase the profile of sexual violence and the needs of survivors at local level. LIOs may want to contact Rape Crisis Centres that have been involved in implementing SVAAP for advice on 'lessons learnt'. (See the *Resources* section)

The Home Office will be up-dating SVAAP and the Implementation Guide to include the new PSAs and indicators. The updated documents will be circulated to local authorities at the end of November 2007. It is anticipated that it will include specific guidance for local partnerships on delivering a co-ordinated community response to sexual violence.

### 3) Gender Equality Duty

The Gender Equality Duty (GED) came in to force in April 2007. The 'spirit' of the Duty is to eliminate gender-blind services and policies, and to ensure that the different needs of women and men are recognised and addressed.

The GED is a legal requirement and the Equal Opportunities Commission (now part of the Equality and Human Rights Commission) has clearly stated that "public bodies cannot ignore it or claim lack of capacity. Resources must be set aside in their budgetary processes to meet this end."<sup>30</sup>

The GED requires public authorities to pay due regard to the need to:

1. Eliminate unlawful discrimination and harassment; and
2. Promote equality of opportunity between women and men.

The Duty also applies to any private or third sector organisations that carry out public functions (i.e. deliver public services on behalf of public authorities).

Most major public bodies (including local authorities, Primary Care Trusts etc) are also subject to 'specific duties' which requires them to do a number of things, but most relevant to the third sector are:

- *Developing and implementing a Gender Equality Scheme:* Third sector organisations, such as women's organisations, should be consulted and this presents an opportunity to get sexual violence into the scheme as a gender equality objective. Voluntary and community organisations can also play an important role in monitoring its implementation.
- *Assessing the impact of their policies and practices:* Gender impact assessments should be undertaken on policies and practices. For example, a strategy on local public transport, must look at the different needs of men and women.

Although local partnerships (such as LSPs and CDRPs) are not subject to the Duty (because they are not public bodies in themselves) the statutory agencies and local authorities sitting on those

partnerships are. Therefore, they need to apply the Duty to all of their functions that are delivered via the partnership. Public bodies should be asked about what systems they have put in place to ensure that their decision making in these partnerships is consistent with the Duty.

For example, if public bodies believe that sexual violence should not be prioritised, this should be checked for consistency against their Gender Equality Schemes and compliance with the Duty generally. They should also assess the impact of their policy decision as it will clearly affect women.

#### **What are some of the arguments LIOs might encounter when trying to get sexual violence on the agenda?**

It is possible that LIOs may come across arguments against including NI26 in LAAs, taking other actions to address sexual violence or funding for services etc. Here we have provided some information to help LIOs counter those arguments.

#### **"Counselling services can be commissioned through GPs, which is cheaper than funding Rape Crisis Centres"**

Survivors of sexual violence require specialist and tailored support services, of which counselling is only one of those services. There is a risk that generic counselling services may not meet the needs of the survivor.

Rape Crisis Centres have 30 years of expertise and are specialist organisations. They provide a range of services in addition to counselling, such as advocacy through the criminal justice system (which supports targets on increasing rape convictions), group sessions, referrals to other organisations (e.g. for housing or employment advice) and telephone helplines. Rape Crisis Centres can provide a greater holistic service which is more likely to lead to better outcomes for women. They also 'add value' and are able to bring crucial expertise and information to policy and service development.

In SVAAP, the Government acknowledges the vital role of specialist third sector organisations, and the need to build their capacity and fund them.

Funding generic services without assessing the impact on women is also incompatible with the GED.

## **"There is no money"**

Simply saying "there is no money" is not an adequate response. Local partnerships/authorities must be transparent in their decision making and it is reasonable to expect that they provide information about how they have come to decisions and the evidence they have looked at. You can request this evidence, for example, in the form of an equality impact assessment.

There are clear statements from the Government on why and how local partnerships should address sexual violence (e.g. through NI26) in SVAAP and PSA and National Indicator documents.

Public law states that local authorities (including local partnerships) must act legally, fairly and rationally/reasonably.<sup>31</sup>

In addition, all public bodies have a legal requirement to eliminate unlawful discrimination and harassment and promote equality of opportunity between women and men under the GED.

## **"There is a Sexual Assault and Referral Centre in the area so sexual violence is already being addressed"**

Sexual Assault Referral Centres (SARCs) are statutory agencies and do not provide the types of services that Rape Crisis Centres do. SARCs are one-stop locations where victims of sexual assault can receive medical care and counselling, and where forensic evidence can be taken for any future Police investigations. They are primarily focussed on recent assaults and the criminal justice system and do not provide ongoing counselling or women-only space. SARCs complement specialist voluntary and community organisations and should not be seen as a replacement. They should have referral routes to groups like Rape Crisis Centres for survivors who want ongoing counselling and other services in women-only settings.

## **"We'll consider sexual violence indicators in the next round of LAA negotiations"**

Again, the local partnership needs to be transparent about their decision not to include sexual violence, given all the evidence why they should. They should

also understand that Rape Crisis Centres are in the midst of a serious funding crisis and the local centre may not be in existence by the next round, in which case a valuable resource for the local area will be lost. Local partnerships should be pressed for details on what interim/emergency measures they will put in place to minimise this risk.

## **Possible actions for LIOs**

- In LSPs and CDRPs, raise the need to include sexual violence targets, particularly NI26, in LAAs (negotiations are taking place now). LIOs should use SVAAP and the GED to support these arguments.
- Contact your local Rape Crisis Centre (see the *Resources* section) to determine if they need any support to engage with LSPs and other decision making bodies.
- Talk to local women's organisations in your area about how you can work with them to get sexual violence onto local agendas, particularly if there is no Rape Crisis Centre operating in your area.
- If there are no Rape Crisis Centres providing services in your area, this is something you can highlight with your local authority, LSP, CDRP and other appropriate forums. Ask them about how sexual violence is being tackled, particularly in light of the new PSAs, SVAAP and the GED.
- Ask your CDRP and Primary Care Trust what action they are taking to address sexual violence. Best practice of what they should be doing is already outlined in the SVAAP Implementation Guide. Key objectives would be to get the CDRP to establish a Sexual Violence Forum, lead on the development of a Sexual Violence Action Plan and put in place actions which will improve funding for specialist voluntary and community organisations supporting survivors of rape and sexual assault.

## **Resources**

### **British Crime Survey findings (2004)**

[www.homeoffice.gov.uk/rds/pdfs04/hors276.pdf](http://www.homeoffice.gov.uk/rds/pdfs04/hors276.pdf)

### **End Violence Against Women Campaign**

[www.endviolenceagainstwomen.org.uk](http://www.endviolenceagainstwomen.org.uk)

**Gender Equality Duty guidance for the voluntary and community sector (2007)**

[www.equalitieshumanrights.com](http://www.equalitieshumanrights.com)

**Local Rape Crisis Centres working in your area**

To find your local Rape Crisis Centre (many centres cover a large geographical area so may be operating in your area even if they are not physically based locally to your LIO), visit the Rape Crisis (England and Wales) website. [www.rapecrisis.org.uk](http://www.rapecrisis.org.uk)

**National Indicators for local authorities and local partnerships (2007)**

[www.communities.gov.uk/documents/localgovernment/pdf/505713](http://www.communities.gov.uk/documents/localgovernment/pdf/505713)

**NAVCA**

[www.navca.org.uk](http://www.navca.org.uk)

**The Public Law Project**

[www.publiclawproject.org.uk](http://www.publiclawproject.org.uk)

**Public Service Agreements (2007)**

[www.hm-treasury.gov.uk/pbr\\_csr/press/pbr\\_csr07\\_press03.cfm](http://www.hm-treasury.gov.uk/pbr_csr/press/pbr_csr07_press03.cfm)

**PSA16 (2007)**

[www.cabinetoffice.gov.uk/upload/assets/www.cabinetoffice.gov.uk/social\\_exclusion\\_task\\_force/chronic\\_exclusion/psa\\_da\\_16.pdf](http://www.cabinetoffice.gov.uk/upload/assets/www.cabinetoffice.gov.uk/social_exclusion_task_force/chronic_exclusion/psa_da_16.pdf)

**PSA23 (2007)**

[www.hm-treasury.gov.uk/media/9/4/pbr\\_csr07\\_psa23.pdf](http://www.hm-treasury.gov.uk/media/9/4/pbr_csr07_psa23.pdf)

**PSA24 (2007)**

[www.hm-treasury.gov.uk/media/5/C/pbr\\_csr07\\_psa24.pdf](http://www.hm-treasury.gov.uk/media/5/C/pbr_csr07_psa24.pdf)

**Rape Crisis (England and Wales)**

[www.rapecrisis.org.uk](http://www.rapecrisis.org.uk)

**Sexual Violence and Abuse Action Plan (2007)**

[www.crimereduction.homeoffice.gov.uk/sexualoffences/sexual03.htm](http://www.crimereduction.homeoffice.gov.uk/sexualoffences/sexual03.htm)

**Sexual Violence and Abuse Action Plan Implementation Guide (2007)**

[www.crimereduction.homeoffice.gov.uk/sexualoffences/sexual03.htm](http://www.crimereduction.homeoffice.gov.uk/sexualoffences/sexual03.htm)

**SVAAP implementation – practical advice**

South Essex Rape and Incest Crisis Centre are happy to speak with LIOs about the Centre's experience of SVAAP implementation in their local area. [www.sericc.org.uk](http://www.sericc.org.uk), [sericc@sericc.org.uk](mailto:sericc@sericc.org.uk) or (tel.) 01375 381322

**Statistics on sexual violence**

See the British Crime Survey, SVAAP and the websites of Rape Crisis (England and Wales), Truth About Rape Campaign and End Violence Against Women Campaign.

**Truth About Rape Campaign**

[www.truthaboutrape.co.uk](http://www.truthaboutrape.co.uk)

**Women's Resource Centre**

[www.wrc.org.uk](http://www.wrc.org.uk)

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3. Ibid, p.i
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[www.un.org/womenwatch/daw/beijing/platform/violence.htm](http://www.un.org/womenwatch/daw/beijing/platform/violence.htm)
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25. PSA24, p.10
26. SVAAP, p.iv
27. SVAAP, p.23
28. Ibid
29. SVAAP Implementation Guide, p.12
30. Gender Equality Duty guidance for the voluntary and community sector, p.7
31. The Public Law Project & NAVCA (undated) Empowering the voluntary sector to challenge unjust public body funding and consultation decisions: Workshop resource pack. The Public Law Project: London.