



Consultation response

'The Way Forward - - A call for action to end violence against women'

Submitted to the Greater London Authority

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Understanding and supporting
women and their organisations

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About the Women's Resource Centre

The Women's Resource Centre (WRC) is a charity which supports women's organisations to be more effective and sustainable. We provide training, information, resources and one-to-one support on a range of organisational development issues. We also lobby decision makers on behalf of the women's not-for-profit sector for improved representation and funding.

Our members work in a wide range of fields including health, violence against women, employment, education, rights and equality, the criminal justice system and the environment. They deliver services to and campaign on behalf of some of the most marginalised communities of women.

There are over ten thousand people working or volunteering for our members who support almost half a million individuals each year.

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Introduction

This response was produced by the Women's Resource Centre (WRC). We have used the expertise of the End Violence Against Women coalition, including their blueprint for an integrated Violence Against Women (VAW) strategy, 'Realising Rights, Fulfilling Obligations'. We have also incorporated key points from our members, women's groups across London with considerable expertise on meeting the needs of women affected by gendered violence; challenging violence against women; and challenging policy makers to understand and take responsibility for how violence against women cuts across all policy. We have also drawn from good practice on VAW and other strategies that are being developed in other countries.

In early May 2009, the Mayor of London, Boris Johnson, and the Greater London Authority (GLA), launched a consultation on a programme of action to tackle violence against women (VAW) in London which is outlined in The Way Forward. This follows the launch of a consultation on a national VAW strategy and there are many similarities in the approaches but also important differences. We hope that the London Strategy will be implemented in the context of the wider national strategy and that they will influence each other. (See our response to the National VAW Strategy consultation at www.wrc.org.uk).

Over-arching comments

We are very pleased that the Strategy has a gendered analysis of VAW from a human rights perspective. We are also very pleased that there is an

acknowledgement of the expertise of (and the need to support) specialist women's VAW organisations, including women-only services. This Strategy acknowledges that they are key in providing services and challenging VAW. There is also an acknowledgement that specialist women's services are facing a funding crisis. The Strategy has an understanding of the diversity of women in London, although this could be built upon. We are encouraged by the awareness of the issues facing rape crisis provision in the capital and the impact of the 'no recourse to public funds' (NRPF) rule on women, and also the focus on prevention and educational campaigns. Prevention is the key to ending VAW, and we warmly welcome the commitment made to an ongoing public awareness and education campaign. The Way Forward represents a good starting point for developing a truly integrated strategy. However, more work needs to be done on how this will be implemented to effectively prevent VAW, protect women from violence, and provide adequate services.

It is disappointing that this understanding of VAW is not supported by enough concrete actions and it is unclear how achievements will be measured. There are few specific plans for implementation and much of the action is deferred to the Government and the voluntary and community sector rather than responsibility taken by the GLA. The Mayor has areas of responsibility in enough key forums within London to take a stronger role in championing this Strategy. As well as lobbying the Government for wider change, the Mayor and other leaders in London should show innovation by putting in place clear outcomes, targets and guidance that will ensure effective implementation. There needs to be accountability for different bodies and crucially there needs to be more than just a criminal justice approach to tackling VAW in London. We are very keen to know how this work will be resourced and taken forward. We would like to see a commitment to this Strategy through development of specific actions; a clear remit about who is responsible for different areas of the Strategy, and how they will be supported to implement it.

In the era of devolution, the 'batting game' between central and local government - where central government says local government has the responsibility for tackling VAW in their local area, and local government says there are no local targets or funding on VAW - is unacceptable. Devolution can no longer be an excuse for buck-passing of responsibility for VAW between central and local government. We hope that the London Strategy works in partnership with the National VAW Strategy and that there will not be competing and conflicting directives nationally and regionally.

A central requirement of any strategy is developing a sustainable funding framework for core NGO services, which is also an obligation for states according to the CEDAW Committee and the UN. For too long VAW services have had to 'shape shift' to fit into ill-fitting funding frameworks, and have become a political football bouncing between national and local governments. For small organisations such repeated insecurity is intolerable.

Women's specialist services are being decimated by this lack of valuing and adequate resourcing. One in five women's services have closed down in the last three years¹. One in five Rape Crisis Centres have closed in the last five years, and

¹ 'Not Just Bread, but Roses, Too: Funding to the Women's Voluntary and Community Sector 2004-2007' (2009)

69% of those remaining identify their funding as unsustainable². One-off funds, though welcome, will not address the lack of sustainability facing the specialist women's VAW sector. Without urgent action we will see mass closures of more and more vital women's services, resulting in more women survivors not being able to access the crucial support they need and deserve, to be able to move on from the impact of violence on their lives.

Even though the importance and value of the women's voluntary and community sector is acknowledged, women's groups cannot take responsibility for implementing the Strategy and must be supported financially to continue the work they are already doing and increase their services, which will advance the Strategy. For them to be key partners in this Strategy, there needs to be adequate VAW money to ensure sustainable funding.

For this strategy to work, the funding crisis facing specialist women's VAW organisations, which have been, and continue to be at the forefront of providing effective, quality support to survivors of violence, needs to be addressed. **The GLA and the London Development Agency (LDA) need to act as champions to emphasise and promote the value of specialised women's organisations. They need to develop sustainable resourcing for specialist women's VAW services, so that access to Rape Crisis Centres, specialised domestic violence services and other specialist women's VAW support, is not dependent on a postcode lottery.**

During consultation with our members it was raised that there were various obstacles and barriers to responding to The Way Forward consultation. Most notably the objectives and actions are confusing and cross-cutting, with some of the recommendations and actions relevant to more than one objective but without these being linked. We have structured this response by connecting the actions we felt were most appropriate to the objectives and then talking to these.

We hope that more is done to involve and encourage the participation of a variety of groups with different capacities in further stages of the Strategy, so that the specialist VAW sector is able to have meaningful input throughout the development and implementation of the Strategy.

Objective 1: London taking a global lead to end violence against women.

Action: Adopt the UN definition of VAW

The UN definition of VAW³ has a gendered analysis and incorporates a human rights approach, both of which are a crucial foundation for challenging VAW. We are glad that this understanding of VAW is being adopted.

² 'The Crisis in Rape Crisis' (2008) Rape Crisis (England and Wales) and Women's Resource Centre

³ United Nations, 2006, Secretary General's Report on Violence against women, Para 28 and 104

Action: Ensure that violence against women is integrated into the Mayor's plans to tackle youth crime, and strategies on transport, housing, health inequalities and refugees.

A commitment for an integrated strategy is to be commended. However, true integration requires adequate resourcing, including for prevention. At a policy level, the specialist women's sector must be safeguarded and strengthened including recognition of its social, political and economic contributions.

Local MPs and councillors also need to commit to the Strategy and implementing it locally. The Strategy needs to be mainstreamed and integrated across all London boroughs and it is crucial that all local authorities are committed to this Strategy.

This action also needs to go further to develop named leads and clear areas of responsibility for different departments.

Action: Call on the Domestic Homicide Review Group to conduct reviews of suicides occurring in the context of domestic violence and to expand its work to include homicides and suicides in the context of 'honour' based violence.

Action: Explore ways of undertaking a study on the extent of violence linked to 'harmful traditional practices' in London and the number of women and girls 'at risk'.

We commend this work. Research should also be commissioned to identify the level of need across different forms of VAW and suggest a pattern of provision for services for adults and children. The Map of Gaps reports⁴ should be used as a starting point for this work.

More research needs to be done to uncover the specific needs of marginalised groups and to meet the obligations for disaggregation of data under the equalities duties and so that disproportionality can be identified and addressed. In order to successfully address issues of equality and diversity, this Strategy needs to contain specific targets (as well as guidance and training) on disaggregation of data. Data on VAW needs to be captured across all equalities strands and disaggregated by gender. Without measuring the baseline, there will be insufficient knowledge of where the starting point is, and what needs to change.

Action: Undertake an ongoing public awareness and education campaign over the course aimed at ending the tolerance of violence against women, making particular use of advertising on the public transport network.

Action: Consider in consultation and partnership with relevant bodies and organisations developing a public awareness campaign aimed at deterring paying for sex and will work with police, local authorities and other London partners in clamping down on paying for sex and on the proliferation of lap dancing clubs across London.

⁴ <http://www.mapofgaps.org/>

Prevention is the key to ending violence against women, and we warmly welcome the commitment made to an ongoing public awareness and education campaign. It is important to encourage schools, local authorities and other funders to provide a comprehensive prevention programme, including work in the curriculum and self-defence training for women and girls. Self-defence is a cost effective way of supporting women and girls to resist violence and overcome its legacies.⁵ Prevention work also needs to learn from the expertise of the specialist women's sector in promoting change. There needs to be a strong approach to gendered violence in schools using existing best practice models and also a focus on tackling childhood sexual abuse. This work must also focus on boys' emotional and behavioral development, challenging narrow and limited constructions of masculinity, as this is key to long term prevention work.

The public awareness and education campaign should be extended by also ensuring that sexualised images and sexist adverts are not displayed in advertising on the public transport network or taxis. Transport for London has already developed guidelines around this that are not being implemented.⁶ Overtly sexualised images of women and young girls promotes their sexual accessibility as a dominant feature of 'being a woman', and reinforces stereotypes of male privilege, creating a conducive context for gender-based violence. There is also substantial evidence that demonstrates the connection between the sexualisation of women in the media and popular culture and VAW.

There also needs to be a commitment for material, such as that produced by WOMANKIND Worldwide⁷, on VAW becoming compulsory across the National Curriculum. It is also important to conduct work wider than the education system such as through youth groups⁸ and other educational establishments. We need a comprehensive public education campaign, across all forms of media and across a range of institutions, which does more than 'say no to violence'. A multi-faceted, long-term campaign must challenge the myths about why violence happens; challenge the social construction of masculinity and femininity that support violence to happen and be covertly acceptable; challenge the myths that blame women for violence and excuse perpetrators.

Other international campaigns aimed at prevention have also been hugely successful such as the We Can End VAW Campaign⁹ and could be drawn on for inspiration and ideas for action.

Action: Ensure that any youth mentoring schemes that are developed through Time For Action (the Mayor's plans to tackle youth crime) address the specific needs of young women and girls.

⁵ See London Centre for Personal Safety response to National VAW Strategy consultation.

<http://www.londoncentreforpersonalsafety.org.uk/>

⁶ OBJECT have produced a briefing focusing on this <http://www.object.org.uk/index.php/the-facts/violence-against-women-policies>

⁷ <http://www.womankind.org.uk/uk-schools.html>

⁸ <http://www.feministwebs.com/>

⁹ <http://www.wecanendvaw.org/>

Action: Ensure that the issue of girls being removed from schools and forced into marriage or subjected to FGM is addressed through the work being done around keeping young people in education in Time For Action.

The diversity of women in London is recognised but the Strategy must incorporate an intersectional equalities framework, to address the impact of VAW on all women. Little has been said about the needs of older women, lesbian and bisexual women, transgender women, gypsy and traveler women and disabled women. The Strategy cannot only be aimed at women who are able to access mainstream or generic services and support.

Similarly, the reality and experience of violence by women, and communities of women, cannot be homogenised, 'woman' is not a homogenous identity and services should not be either. There is a particular need for minority women who experience intersectional discrimination to run their own specific services. Services led by and for minority women are necessary in addressing social exclusion and community cohesion.

In the section on Governance and Leadership, the Strategy includes acknowledgement of academic excellence and the innovation and knowledge of the voluntary and public sectors as well as a commitment that the voices of survivors will inform the implementation and the development of services. We welcome a London Violence Against Women Steering Group which will be established to work with relevant bodies and voluntary organisations and be responsible for the delivery of the Strategy. We are glad that there is acknowledgement of the importance of stakeholder groups feeding into the strategy and a direct link to service users, to have an information and influencing role. We would like to see this structure involving women's organisations through discussion of issues that affect them and their users, and we hope that this will translate from more than consultation, to active involvement and ongoing meaningful input. We hope that the Mayor and the GLA will be accountable to the Steering Group and that it will be a forum for feeding into the Strategy itself. We hope that as well as the main delivery partners this group is representative of the sector and of the diversity of women in London. We would like to see a transparent process for membership and support for groups to be involved.

It may be useful for there to be smaller sub-groups/forums on particular issues and for particular groups (e.g. Survivors Forum/Experts Forum) or a funded working group to bring together different sectors to generate new ideas, develop and pilot innovative responses, and identify and deliver best practice. This would ensure expertise on specific issues and wider inclusion of marginalised and specialist groups as well as giving space to monitor specific issues and take these on at a borough level.

Recommendations:

- The Greater London Authority (GLA) must ensure a robust gendered analysis is embedded throughout the Strategy.
- The GLA needs to work closely with the specialist women's sector as key partners in the development and implementation of all threads of this Strategy.

- The Strategy must incorporate an intersectional equalities framework to address the impact of VAW on all women. For example, implementing research to identify the specific needs of different groups of women, particularly marginalised groups, and research to suggest a pattern of provision for services, including services for children and young people.
- The GLA must be a model and champion of the obligations under the Gender Equality Duty for Statutory services and bodies to have specific targets (as well as guidance and training) on disaggregation of data.
- There need to be specific budget lines for the Strategy, including for prevention and for specialist women's services.
- The Strategy needs to be mainstreamed and integrated across all London boroughs. It is crucial that all local authorities are committed to this Strategy and that it is enforced by the GLA.
- The GLA need to work with Transport for London and the Public Carriage Office to ensure that sexualised images and sexist adverts are not displayed in advertising on the public transport network or taxis, as per established guidelines.
- The GLA need to encourage schools, local authorities and other funders to provide self defence training for women and girls.

Objective 2: Improving access to support

Action: Consult London boroughs to consider how local structures can be put in place that take an integrated approach to violence against women.

Local understanding and implementation of VAW work needs to be urgently addressed. There is a serious problem with how local government is addressing VAW. Many local authority areas are not identifying VAW as an issue to address through their local targets, despite the scale and cross-cutting nature of this form of gendered discrimination; despite their obligations under the Gender Equality Duty (GED) to take the biggest action on the biggest issue, and despite the Equality and Human Rights Commission (EHRC) identifying VAW as a major gender inequality issue. All statutory agencies also need to work together to create a joined-up strategy in each borough and model policies should be created which can be implemented at every level. It is important that VAW is made a priority at local level, that implementation of the Strategy is taken seriously, for example through extending local domestic violence forums to VAW forums; ensuring sexual violence and other marginalised forms of VAW are addressed, resourcing specialist VAW services.

The representation of women on decision making bodies and in positions of power is something that could also be addressed as part of a gendered analysis of power relationships which impacts directly on VAW. We are disappointed that the Mayor removed the role of Women's Advisor from his team as this position acts as an important champion for women's issues and rights and provides a voice for women across the capital. We would recommend that this role is reinstated in the GLA.

Women's organisations are not able to penetrate their Local Strategic Partnership (LSP), as less than 2% of voluntary and community sector representatives are from the women's sector,¹⁰ and therefore struggle to influence their Sustainable Community Strategy (SCS) priorities or their Local Area Agreement (LAA) targets, despite the current focus on community engagement. The lack of capacity of women's organisations to influence local decision making, as well as the failure (and often lack of willingness) of LSPs and decision makers to effectively engage women's organisations is a serious cause for concern in relation to VAW. Local structures such as LSPs, where women's groups are already underrepresented, are an appropriate place to take an integrated approach to VAW and local authorities need to provide effective engagement and support programmes to improve the representation of women's organisations on local decision making bodies.

The Way Forward includes an awareness of the importance of the GED and how this has been misinterpreted but we would like to see greater pressure on local authorities to make sure that they fulfil their obligations and are not acting illegally. Under the GED, local authorities need to consider the different impact of funding decisions on women and men but many local public sector bodies are interpreting the GED in a gender-neutral way and challenging women's services for not providing services to men. Commissioners do not understand the value of specialist women's services and there is a mainstream take-up of generic, large-scale commissioning models that are clearly not meeting the needs of women survivors of VAW, failing both women and legal obligations under the GED.

The Duty to involve is also now live. Under its obligation to "engage a diverse range of groups...including those who can often be marginalised or vulnerable people"¹¹, we believe local government are negligent in meeting this duty if they are not involving and consulting with women's organisations. In addition, considering the devastating extent and impact of VAW, local government will need to involve and consult with survivors of VAW. We hope that the Strategy will ensure that the voices and needs of survivors are integral to devising and implementing it at a local level.

Action: Call on key agencies, local authorities and government to respond to the needs of women experiencing violence through the provision of high quality core support services with equitable access across London.

Action: Collaborate with the voluntary sector, local authorities, the criminal justice system, NHS London, and funders as well as draw on recent government research on the stability and sustainability of the violence against women sector to identify sustainable funding strategies to meet the levels of need identified for the core support services across London.

Currently a severe lack of funding and resources means that the needs of London's diverse communities are not being met. The need to build capacity across the specialist women's VAW sector is highlighted in the Strategy and there is an awareness of the need for essential sustainable funding, which we warmly support. However, the only explicit commitment to GLA funding so far has been for rape

¹⁰ Gudnadottir, E., Smith, S., Robson, S. and Corry, D. (2007) Where are the Women in LSPs? Women's Representation in Local Strategic Partnerships, Urban Forum: London

¹¹ <http://www.communities.gov.uk/documents/localgovernment/pdf/885397.pdf>

crisis provision. We would like to see more concrete targets on how this will be implemented across the capital, for example learning from the lessons of Scotland where ring-fenced funding led to services being secured and expanded. We commend the Scottish model of ensuring baseline funding is provided to third sector specialised women's organisations through a dedicated budget line. We would like to see the Mayor become a champion of specialist women's VAW services (including women-only services) as key to ensuring high quality support services to meet the needs of all women.

Example of funding in Scotland:

The ring fenced funding for Rape Crisis Centres has led to Scotland being the only part of the UK where provision has increased (Map of Gaps 2007). Each centre receives £50,000 annually from the Scottish Government, guaranteed until 2011, and funding has also been made available for a national sexual violence helpline.

In addition to funding of £10.5 million since 2000, the Scottish government has provided £3 million per annum in 2006/7 and 2007/08 through the VAW Fund, which has secured existing services and expanded provision. In April 2008, further funding of £22 million was announced in Scotland, with 41 projects benefiting from the Children's Services Women's Aid Fund and 73 projects from the VAW funding stream.

Insufficient budgetary allocation and the lack of a gender perspective in economic policymaking are identified as barriers to women's equality and there is an urgent need for links between all forms of VAW to be acknowledged in budgetary allocations and LAAs, since the vast majority of funding for specialised VAW services remains focused on domestic violence. The different parts of the Strategy need specific budgets attached to them, such as a separate budget for services for children and young people, and these need to be protected and secured.

A key point in an integrated strategy would be reaffirming that the statutory sector work in partnership with the specialised women's voluntary sector to offer the range of provision that is necessary. Limited understanding of the dynamics of VAW and appropriate responses by professionals in social welfare and health services, within the criminal justice system and all staff in schools is continually raised by service users.

In the work on identifying sustainable funding for the VAW sector, the negative impact of commissioning on the specialist women's sector needs to be addressed. WRC is concerned that competitive tendering favours big, rather than small, organisations and national, rather than local organisations. It enables the growth of 'super' providers – larger organisations, including private sector companies that are well equipped to win multiple contracts, sometimes parachuting into geographical and service areas where they have no track record or experience. Generic providers must address VAW and use a gendered analysis when tendering.

Public bodies are also increasingly bringing several different services together into a single contract, often in the mistaken belief that 'bigger is better'. This may often be a false economy: a short-term 'efficiency saving' at the expense of many

additional benefits that can come from commissioning local organisations. In addition, larger contracts with fewer providers diminishes the diversity of the provider base (which in itself is likely to have hidden costs in the medium- to longer-term). Women's organisations often find they do not have the capacity and infrastructure to tender for or manage these larger contracts.

There is little or no evidence that competitive tendering results in better services and outcomes for the diverse range of people and communities in greatest need.

Too often, 'value for money' is being narrowly defined in terms of lowest cost tenders, despite government guidance to the contrary.¹² This represents significant missed opportunities to contract local women's organisations that will contribute to future resilience in the local area (e.g. employment) and deliver "a triple bottom line of social, environmental and economic benefits".¹³

Women's organisations are often excluded from tendering because commissioners want to contract with a single provider to deliver a generic service (i.e. for both men and women). This is exacerbated by the *little* influence women's organisations are able to exert on policy decision making, and commissioners' lack of understanding about the conditions needed to achieve women's equality, or the differing needs between women/girls and men/boys.

We would like to see the GLA and LDA taking the lead in promoting the importance of a funding mix where not all services need to be commissioned and grants are also available as smaller groups are often excluded through the tendering process and rely on grant funding to survive, as demonstrated by the NAVCA Local Grants Forum.¹⁴ We would also like to see intelligent commissioning which has an awareness of the issues facing women's organisations and is not based on competitive procurement. All funding cycles should be at a minimum, three-yearly and follow the COMPACT, and must adhere to the equality duties so that funders are acting legally.

Action: Call on statutory services to introduce funding and commissioning criteria that address the needs of marginalised women including through funding specialist women-only services.

It is very encouraging to see that the Strategy is aware of the importance of women-only and specialist women's services and we hope that this understanding is supported by a commitment to funding these services. The most obvious feature that women's organisations provide that is rarely offered by mainstream organisations is women-only space. Providing women-only space is a crucial aspect of how specialist women's services work. However, women-only services are constantly being asked to justify their existence, despite the fact that these services are needed and wanted by women, and have significant, positive impacts on service users.

¹² <http://www.communities.gov.uk/documents/localgovernment/pdf/885397.pdf>

¹³ <http://www.guardian.co.uk/society/2008/oct/29/localgovernment>

¹⁴ <http://www.navca.org.uk/stratwork/natpolicy/localgrants/>

The GLA needs to ensure that guidance for local government and Primary Care Trust (PCT) commissioners includes information about the value, legality and benefits of women-only specialist services.

Bolstering the expertise of specialised women's services that deliver support, and frequently preventative work, is also cost effective. Engagement with a specialised women's organisation can empower women to cope with the aftermath of violence and thus reduce the likelihood of subsequent mental health treatment or children being removed into care, as well as potentially avert the need for (costly) health and criminal justice intervention.¹⁵

This guidance should address marginalised women's needs, through acknowledging that there is also a particular need for minority women who experience intersectional discrimination to run their own specific services. Services led by and for minority women are necessary in addressing social exclusion and community cohesion.

Action: The Mayor has allocated funding from his budget to increase the provision of specialist women-only rape and sexual abuse support services across the capital by working with London boroughs.

Action: Continue to engage in discussions with London Councils and to lobby government to secure sustainable funding for rape crisis provision across London.

The Strategy acknowledges that although reported rapes, sexual assaults, and incidents of other serious sexual violence have all increased in London over the last twelve months, the services available to survivors are limited and many are threatened by a lack of long term sustainable funding.

We are encouraged by the awareness of the issues facing rape crisis provision in the capital and nationally, and welcome the support pledged by the Mayor and consultation with relevant organisations. We look forward to seeing this implemented and hope that it will provide further support as soon as possible. This could include commissioning existing women-only sexual violence services to expand provision to provide a network of accessible independent specialist rape and sexual abuse support services.

We are aware that the Mayor and the Mayor's office has already had discussions about this issue with representatives from Rape Crisis (England and Wales) which included the only London Rape Crisis Centre, Croydon Rape and Sexual Abuse Support Centre (RASASC). We strongly recommend that the Mayor and the GLA implements the proposal set out by Rape Crisis (England and Wales), namely that current women's voluntary and community sector organisations, which already have expertise and are supporting survivors of sexual violence, are funded.

We strongly welcome that the Mayor has identified that women-only rape and sexual abuse support services are needed.

¹⁵ Matrix Consultancy, 2006

Action: Collaborate with the voluntary sector, local authorities (individually and collectively), the criminal justice system, the health service, the Mayor's Fund and funders to identify sustainable funding strategies to meet the levels of need identified for support services for children across London.

Action: Consult with the London Safeguarding Children Board and other relevant London agencies to consider how support for the parents of sexually abused children can be enhanced, including improving responses to the non-abusing parent in situations of sexual abuse within the family and how children's services, particularly within schools, can be developed to help limit the long-term damage of child sexual abuse.

Protecting women is frequently the best form of child protection. We welcome the commitment to provide the support that children who experience sexual abuse need and deserve, as well as support for non-abusing parents. It is also encouraging to see that the Strategy is aware that when young people experience violence this is a safeguarding issue. However, this cannot be limited to when the perpetrator is an adult and must also be used to address violence from peers and responding to the perpetrator and victim when both are under 16. There has been little in policy or strategy to address the needs of young girls who experience violence from peers as the focus is on domestic violence and violence that young people witness. This work needs to be done in collaboration with the specialist women's sector.

It is encouraging to see that the Strategy acknowledges the link between childhood sexual abuse (CSA) and abuse in later life and we hope that this link is highlighted. Adult women survivors of child sexual abuse are a 'hidden' and therefore often 'ignored' group with complex needs and we hope that they will be targeted through the Strategy.

Action: Call on government to meet its UN obligations to develop and fund violence against women training programmes for judicial, legal, medical, social, educational and police and immigration personnel.

Action: Consider, in consultation with partners, developing a training consortium to improve the training of professionals on violence against women across London. Such training should include information about addressing the needs of London's diverse population.

We support this call for the government to meet its UN obligations. The Beijing Platform for Action (BPfA) requires governments to develop and fund training.¹⁶ This training should be delivered by the specialist women's VAW sector, and should also extend to funders. We would like to see gender training for the statutory sector and those who will be engaging with stakeholder groups, for example through the Steering Group. Gender leads in local authorities also need training, for example on writing gender impact assessments and gender equality schemes which should include VAW.

¹⁶ <http://www.un.org/womenwatch/daw/beijing/platform/> (1995)

The training consortium idea is welcomed and needs to include specific guidance on all forms of VAW, including forced marriage, so called 'honour' crimes and FGM, to ensure routes to protection, provision and prosecution. There needs to be training on all forms of VAW as a core element of professional qualification and in-service learning for professionals in social welfare and health services, within the criminal justice system and all staff in schools.

Funders should also be trained in gender equality and the GED to give them an understanding of the issues and to avoid perpetuating the lack of funding for women-only services and specialist provision.

Action: Work with voluntary and statutory agencies to improve the availability of information and resources to members of the public so that they are able to support women more effectively.

Helping the supporters of victims requires clear gendered analysis of VAW, the contexts it occurs in and its impacts. We commend this aspect of the Strategy. However, providing information to the public also requires the availability of specialist women's services that are able to respond to women's diverse support needs. We need sustainably funded services for the public to refer women onto, and specialist women's services need to be involved in the development of this work.

With respect to women in marginalised communities it is even more important to ensure that they know they have safe spaces in which they feel able to disclose, since for some knowledge of what has happened may place them at risk of further violence.

It is important to communicate what services are available and provide signposting to support services. There could be a directory for VAW services in London on the GLA and other websites and boroughs should also have information about their local services. This would also identify gaps in provision and what services are needed. However, helplines and web based resources need to begin from contextual information and its implications, before offering 'advice'. We need to enable supporters to understand the complexity of violence and reactions to it, in order that they do not act in ways that reinforce shame and self-blame. There is a particular challenge here with respect to forms of violence more common among minority communities – to integrate them into the Strategy and all its elements, rather than 'culturalising' them. It is also a challenge to enable communities to challenge perpetrators.

Action: Work with the Foundation for Women's Health, Research and Development (FORWARD) to develop a comprehensive response to FGM.

We commend this work, which will go some way to meeting the 2008 CEDAW concluding observations on increasing efforts to design and implement targeted FGM prevention strategies and education and awareness-raising programmes. This should include developing more FGM specific clinics and training for ante-natal staff.

Recommendations:

- The GLA need to become a champion for specialist VAW services and work with the London Development Agency (LDA), local government and other funders to develop funding for these services.
- The GLA and LDA need to take the lead in promoting the importance of a funding mix where not all services need to be commissioned and grants are also available. Funding cycles should be at a minimum, three-yearly, and COMPACT compliant and intelligent commissioning and non-competitive procurement should also be encouraged.
- The GLA and LDA should demonstrate best practice by encouraging partnerships to apply for commissioned services to strengthen the sector.
- The GLA should ensure “funding and commissioning criteria that address the needs of marginalised women including through funding specialist women-only services” by including clear guidance for local government and Primary Care Trust (PCT) commissioners about the value, legality and benefits of women-only specialist services and their obligations around delivering and commissioning services in terms of the GED.
- Commissioning guidance needs to include an outcome focus for women and children rather than unit cost in line with statutory guidance on best practice.
- The GLA should lobby the Audit Commission to address VAW through the Comprehensive Area Assessment.
- The GLA should lobby the Local Government Association (LGA) to revise the Equality Standards for local government to include VAW as a specific equalities target.
- The GLA should encourage local government to demonstrate action to involve and consult women’s organisations and women survivors of VAW in their local priority setting and service planning to meet their obligations under the Duty to Involve.
- The GLA, LGA and EHRC must encourage local authorities to sign up to the VAW Strategy. At a minimum, this would ensure a gendered analysis of VAW is integrated across local mechanisms and ensure adequate local specialist voluntary and community sector and statutory VAW support is available.
- The GLA, LGA and EHRC must encourage local authorities need to provide effective engagement and support programmes to improve the representation of women’s organisations on local decision making bodies.
- There needs to be gender training for the statutory sector including training funders in gender equality and the GED.
- The GLA must lobby for training on all forms of VAW as a core element of professional qualification, in line with the BPfA requirements. For example there should be mandatory training, developed and delivered, at least in part, by the specialist women’s sector, for professionals working with children on child sexual abuse, forced marriage, FGM and the impact of domestic violence.
- The GLA must implement the proposal set out by Rape Crisis (England and Wales) to fund current women’s voluntary and community sector organisations, which already have expertise and are supporting survivors of sexual violence. The Strategy also needs to acknowledge adult survivors of child sexual abuse (CSA) and the long-term health and other impacts for adult survivors of CSA.

- There needs to be a transparent process for membership and support for groups to be involved in the London VAW Steering Group as well as smaller sub-groups/forums of the Steering Group on particular issues and for particular groups (e.g. Survivors Forum/Experts Forum).
- The Steering Group should be mirrored at borough level by Violence Against Women Forums.
- Child protection policies need to incorporate protection of the mother as key to the children's welfare and safety.
- The GLA need to implement the guidance and recommendations on women's mental health Supporting Women into the Mainstream¹⁷ into the London Health Inequalities Strategy, including training for all staff on VAW, and single-sex wards as standard practice.
- Any public education campaigns or other work to enable the public to support survivors of violence must be done in conjunction with specialist women's VAW services.
- The GLA should develop a web-based directory for VAW services in London and boroughs should also have accessible information about local VAW services.

Objective 3: Addressing health, social and economic consequences of violence

It is important that the health¹⁸ and social implications of VAW as well as impacts on employment and wider society are acknowledged and we would add to this recognition that the current recession will exacerbate the financial impact of VAW.

Action: Integrate violence against women prevention into the London Health Inequalities Strategy.

Action: Work with the London Health Commission to convene a roundtable event in order to facilitate engagement of the health sector in the new violence against women strategy.

Action: Call on the NHS in London to develop and implement a comprehensive approach to violence against women as a matter of priority and to introduce routine enquiry around violence against women and appropriate support and referral mechanisms into the following services:

- mental health
- sexual health services, including those aimed at teenagers
- maternity and post-natal provision
- accident and emergency
- and to develop a strategy for increasing access to appropriate interpreting services.

¹⁷

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4131070

¹⁸ See WRC briefing on VAW and health (2008)

http://www.wrc.org.uk/resources/briefings_and_consultations/past_briefings_and_consultations/women/violence_against_women.aspx

We have concerns about how VAW is currently worked on by health and so warmly welcome these proposals. It is encouraging that the importance of an integrated response across all areas of NHS care is understood and we hope that the health taskforce will be linked up with the Strategy. Crucially, the GLA needs to encourage health agencies to ensure a gendered analysis of VAW is adopted and embedded. The role of the NHS in referring women on to other services and commissioning specialist support services is also highlighted. However, there is no action on then providing funding to referral services and the impact commissioning has had on women-only services when generic services are prioritised. For example Rape Crisis Centres are facing funding crises but do not receive funding from local Health or Crime and Disorder Partnerships which refer women on to them.

We need adequate and sustainable resourcing of specialist VAW services, in order to cope with demand. There is no point in introducing routine screening where professionals have nowhere to refer on those who disclose to them about VAW.

Mainstream health services must not just acknowledge the prevalence of VAW but integrate this across primary health care. For instance, while Department of Health Guidance on Commissioning Women-only Community Day Services¹⁹ recognises violence as an underlying factor in women's mental ill-health, the recommendations from these reports are yet to be implemented and unfortunately appear unlikely to be so. Stakeholders also report extreme difficulty in engaging local PCTs with the VAW agenda.

Action: Collaborate with the Stella Project, the Greater London Alcohol and Drug Alliance (GLADA), the health service and substance misuse services to increase awareness of the links between violence against women and substance misuse and improve responses.

Recently the only women-only alcohol service in London was lost when it had to merge with a larger generic organisation. We hope that the Strategy will ensure that specialist provision is supported and increased, for example by promoting specialist women's services over generic provision in commissioning guidelines.

Action: Call on government to ensure that the advice sector receives increased funding so that they can offer better support to women who require financial and legal aid as a consequence of the violence and financial abuse they have experienced.

We welcome the integrated approach which includes the advice sector as this may be the first point of contact for some women experiencing VAW. We hope that this would also include comprehensive training for staff in this sector to ensure that they have an understanding of the issues affecting women and are able to refer them on to other services. Again it is important to make sure that funding is provided for these referral agencies.

Action: Call on government to help victims to improve their skills and tackle unemployment of women and look to the London Skills and Employment

¹⁹ <http://www.library.nhs.uk/mentalhealth/ViewResource.aspx?resID=268363> (2006)

Board to support this ambition as they aim to promote equality through the delivery of their strategy.

Action: Ask ESF co-financing agencies²⁰ to explore the possibility of making women who have experienced violence one of their key target groups for their employment and training programmes so that funding is allocated to projects that support women who are victims of violence.

We are interested to see how VAW will be prioritised in employment and training programmes and hope this will be implemented at a local level. Supporting survivors into training and employment could be extended by offering bursaries or low interest loans to women, as well as women-only training and opportunities. We hope that these issues will be taken up with the London Skills and Employment Board and the LDA.

Action: Call upon government to introduce a new resettlement grant for women escaping violent relationships.

We welcome the commitment to developing ways to financially support women who are escaping violence or have experienced historic violence.

Action: Through his London Housing Strategy, the Mayor will:
- encourage social landlords to offer holistic sanctuary schemes to victims of violence preferring to stay in their homes and he will encourage social landlords to ensure that timely moves are available for women escaping violence both across and within boroughs
- ensure that the London Delivery Board to end rough sleeping considers the specific needs of women
-encourage social landlords to ensure their housing policies and monitoring in relation to violence against women are comprehensive and appropriate.

We are interested to see how the actions around the London Housing Strategy will be enforced and hope that the issue of generic housing associations taking over specialist independent refuge provision will be addressed as well as the obligations of local authorities under the GED in these cases. Research conducted into London women's refuges in 2007 found that at least seven independent refuges run by women's organisations had been taken over by housing associations since the introduction of competitive tendering under Supporting People.²¹ We hope specialist and women-only refuge provision is protected and increased and that the Mayor continues to encourage boroughs to meet their affordable homes targets.

Homeless services are also asked in the Strategy to develop ways to reach homeless women, but existing women's services that work with homeless women

²⁰ The ESF co-financing agencies for London are: Department for Work and Pensions (DWP) - London, London Councils, London Development Agency, Learning and Skills Council (LSC) - London

²¹ Funding to London Women's Refuges: A Report to London Councils, WRC, 2007

and woman at risk of homelessness should also be supported, funded and developed.

Action: Call on the UK Border Agency to ensure consistent implementation of their gender guidelines.

Action: Call on government to guarantee the right of women with uncertain immigration status who are fleeing or threatened by violence to have access to crisis, temporary and permanent accommodation, specialist support services and essential financial support.

We warmly welcome the commitment to address the needs of women with insecure immigration status. However, more could be done here. CEDAW clearly says that states must respect, protect and fulfill women's human rights, regardless of immigration or other factor. The No Recourse to Public Funds (NRPF) campaign calls on the UK Government to:

- Allow refugees to access adequate funding to protect women who are suffering abuse
- Provide an exemption to the 'no recourse' ruling to ensure women are not forced to remain with a violent partner
- Ensure that domestic policies do not contradict each other to undermine women's rights, as part of an integrated strategy.

We hope that the London VAW Strategy will include lobbying for a change in the law to eliminate the NRPF rule and that funding will be provided to local authorities to finance services that support women with NRPF. We would also like to see this issue considered in the Refugee and Migrants Forum.

Action: Ask the Ministry of Justice to ensure that the national implementation plan for the Corston Report meets the needs of London.

The implementation of the Corston Report (2007) recommendations for specialised community-based women's centres as an alternative to prison for vulnerable women is warmly supported. We hope that the London VAW Strategy will implement this and support existing services to expand to cover this provision. Women offenders are formally or informally excluded from accessing services. This underserved group needs specialist women-only support and advocacy services in all prisons for women who have experienced sexual or gender-based violence; access for women offenders and ex-offenders to all domestic violence services, and specialist training for community-based staff in meeting the needs of women ex-offenders. We are pleased that the Ministry of Justice have recently announced funding to take forward the Corston Report recommendations and we hope that specialist women's services in London are able to access this support and benefit from this funding.

Recommendations:

- The GLA and LDA must lobby the Strategic Health Authority, London Health Commission and NHS London to fund specialist VAW services that health services are referring women onto.

- The GLA and LDA must lobby the Strategic Health Authority, London Health Commission and NHS London to adopt a gendered analysis of VAW and to work with the specialist women's VAW sector to develop the VAW Strategy.
- The GLA must follow up the action on lobbying the Government to ensure that the introduction of a new resettlement grant for women escaping violent relationships is implemented at a local level.
- The GLA and LDA should ensure specific funding for local authorities to finance services that support women with 'no recourse to public funds' (NRPF).
- The Refugee and Migrants Forum should consider the issue of women with NRPF.

Objective 4: Protecting women at risk

Action: Call on government to review the impact of legal aid reforms on the ability of women to access civil protection.

Action: The Mayor, through the MPA will consider a number of specific areas of work aimed at improving the police's response to violence against women including:

- receiving regular reporting across violence against women
- auditing recording and reporting practices
- quarterly monitoring of the Home Office minimum standards for reporting sexual offences at borough level¹⁵⁸
- monitoring withdrawals and no-criming across violence against women
- monitoring disproportionality
- monitoring responses to honour based violence, forced and child marriage and FGM
- improving front desk delivery in relation to violence against women
- police training on violence against women.

Action: Ensure that the Parenting strand of Time For Action addresses the needs of mothers whose authority is undermined by domestic violence.

We welcome these actions. In order for women to feel confident, they need to be treated with respect and dignity through each step of the criminal justice process. Women going through the criminal justice system deserve access to appropriate support, including being given the choice of support by specialist women's services. The barriers to women reporting should also be acknowledged, and where interventions from voluntary and community organisations may be more appropriate, such as when women and girls are gang associated.

Police training to challenge the widespread myths that women lie about sexual assault and other fallacies that serve to shift the blame from the perpetrator to the victim is urgently needed, alongside tougher penalties for police who discourage women from reporting, or do not adequately support and investigate cases of women who do.

Specialist women's VAW services are essential to allow women space to name their experiences as violence/abuse and explore what support they need to overcome the legacies. The majority of women still choose not to report to the police therefore criminal justice responses must not be prioritised over a voluntary sector-led, preventative approach. Support for survivors of VAW must be varied and not reliant on conviction and police report rates. Local services should be wider than domestic violence support provision, including support for women who are survivors of childhood sexual abuse, currently scarce, such as Rape Crisis Centres. It is vital that women can seek help in safe places they know are not linked to the police, immigration or social services. These services should be women-only and free at the point of access.

Recommendations:

- The GLA should work with the Metropolitan Police Authority (MPA) to ensure Criminal Justice System (CJS) data collection and collation systems are 'fit for purpose' in order to meet obligations for disaggregation of data under the Equality Duties.
- The GLA and CJS must ensure that courts systematically take domestic violence, sexual violence and childhood sexual abuse into account when making child contact and/or child protection orders.

Objective 5: Getting tough with perpetrators

Any publicity produced around this objective should use language that does not inhibit reporting. Also it is important to be clear about what the purpose of these policies is, to punish or to hold perpetrators accountable and help them to change? More resources are needed to develop a greater understanding and early intervention and prevention programmes.²²

Action: Demand that the Government improve intelligence gathering and information sharing about how traffickers operate in order to more effectively stop and prosecute them and identify women and girls who have been trafficked and work with the Met to get tough on trafficking.

Action: Work in partnership with the Equality and Human Rights Commission to convene a trafficking roundtable event that will bring experts together to examine how to combat trafficking, prostitution and sexual assault during the Olympics and major sporting events.

Action: Champion a more sustained anti-trafficking operation for London that would require the Metropolitan Police to work in partnership with national and regional law enforcement agencies such as the Serious Organised Crime Agency, the UK Human Trafficking Centre, British Transport Police and the police forces who police airports that serve London (Sussex, Essex and Bedfordshire) to ensure that the successes achieved since the inception of Operation Pentameter continue with rigour.

²² See response from Families Without Fear <http://www.familieswithoutfear.org.uk/index.htm>

We support the work on challenging trafficking, especially the awareness of the issues which may surround the Olympics and other large sporting events. However we are concerned that there will be an impact on this work if the funding for the Human Trafficking Team in the Metropolitan Police Service is only funded until 2010. We hope that a multi-agency response to trafficking continues to be developed including specialist voluntary sector input.

Action: Host a summit involving key London agencies and leading experts to investigate the links between violence against women and youth crime particularly on the issue of rape within gangs and identify appropriate responses.

Action: Work with the Metropolitan Police to ensure that as part of their youth gang strategy the issue of Violence against women within gangs is given top priority.

Much work on gangs has focused on young men. We would like to see more support and awareness of young women who are gang associated and funding for programmes and specialist women's organisations which support them. Although the Strategy acknowledges the prevalence of rape and sexual assault and the oppressed role of women and girls in gangs, there is much more that needs to be addressed. For example the issue of limited police involvement in cases of rape and kidnap that are gang associated, and the lack of access to any local services because of gang-related restriction of movement. We would ask for more training for the police around these issues and appropriate aftercare for victims. The strategy also needs to be clear about what different types of violence exist for women and girls who are gang associated and make recommendations for each of them rather than homogenising them.

There are increased risks for staff and resources needed to support gang associated young women. These issues must be taken into account when VAW services are increased or new ones started. We also hope that there is an awareness and acknowledgement that some initiatives around gangs can have a negative impact on women/girls. Strategies often ignore the use of rape as a weapon in gang conflict and can create an increased risk of violence and victimisation during these periods, as rape is seen as a safer and 'hidden' weapon that cannot be stopped and searched for. When an arrest is made women and girls associated with the arrested gang member are also often placed in immediate risk of assault.²³

Action: Call upon government to undertake an independent evaluation of the Integrated Domestic Abuse Programme to assess its effectiveness in reducing re-offending and to gauge their value for money.

Action: Addressing violence against women through joint engagement meetings.

²³ See ROTA's Building Bridges Project report
<http://www.rota.org.uk/Downloads/BBP%20Post%20Conference%20Report%202.pdf>

Action: Ensure that the safety issues presented by lap-dancing clubs come under local authority and police scrutiny through joint engagement meetings and support boroughs in ensuring that the proliferation of lap dancing clubs is controlled.

There is a need for professional training from a gendered analysis, and building the network of community based programmes, endorsed by the RESPECT network²⁴, for perpetrators of all forms of VAW which allow for voluntary entry.

There are no specific actions on confronting perpetrators on the impact of their abuse. If we are calling on men to change, we must ensure that appropriate services are available which not only support this, but enable men to understand the complex roots of their behaviour. There are two key areas of intervention with sex offenders - work with adults in the criminal justice system, via the Sex Offenders Treatment Programme, and work with young people (the vast majority of whom are boys) through interventions based mostly in the voluntary sector. This preventative work could also come through educational programmes in schools and public awareness campaigns.

The work that needs to be done around perpetrator programmes is included but it is also acknowledged that “by providing associated women’s support services perpetrator programmes provide an additional source of support to women who may not yet have accessed support services.” We hope that this means that money will not be given disproportionately to perpetrator groups and that women-only services will be maintained. Work with perpetrators should not be developed at the expense of services provided to their victims.

If agencies and communities are to respond appropriately to perpetrators, information about availability of services is essential. Given the current high attrition rates for VAW offences, and under-reporting, programmes that rely on criminal justice mandated entry will reach a tiny minority of perpetrators. It is surely a lost opportunity, which incurs higher costs, to wait until violence has become so severe and repeated that it is subject to prosecution. Whilst not necessarily a majority, there are a significant number of men who could be engaged at an earlier point, were services available. Placing prevention at the core of an integrated strategy would encourage professionals and agencies to think beyond the reactive management of dangerous individuals, to imagine how to create deeper and longer term change.

Recommendations:

- The GLA should ensure there is a gendered analysis in the Youth Crime Strategy.
- The GLA and LDA should provide support and raise awareness of young women in gangs and programmes and specialist women’s organisations which support them.
- Perpetrator work needs to be accredited through the RESPECT network, and work from a gendered analysis.
- Access for perpetrators must be broadened substantially from a reliance on the CJS.

²⁴ <http://www.respect.uk.net/>

Monitoring and evaluation

There is little on how the Strategy will be evaluated and how any targets will be monitored to ensure that they are effective. The UN recommendation for VAW surveys every 10 years to measure prevalence and the risk and forms of VAW is suggested, but this is not set as a target or action. How will the progress of the Strategy be measured? We would like to see the GLA working with other agencies to undertake a prevalence study and encourage commitment to funding a repeat survey every 10 years.

All statutory agencies should be encouraged to evaluate and review their performance on responding to VAW including establishing appropriate indicators and recording systems as already exist for the police and criminal justice system. Good and bad practice in local authorities in terms of the delivery of appropriate and effective responses should also be highlighted and publicised by the GLA to ensure best practice is reproduced.

Statutory bodies need to also report their progress to the Steering Group regularly and annual reports should be published. Monitoring of the Strategy could come directly from service users and those affected and be fed up to the Steering Group via women's organisations. It is also important to have minimum standards for any statutory or voluntary sector organisation delivering services to ensure a safe and effective service.

Recommendations:

- The Strategy must develop specific actions, a clear remit about who is responsible for different areas, and how they will be supported to implement it.
- The GLA and LDA should lobby for an extensive prevalence survey on VAW every 10 years.
- The Mayor should encourage and lobby statutory agencies in London to develop appropriate and robust monitoring and evaluation systems, including gender disaggregation on VAW data.
- The GLA should develop a monitoring and evaluation role for the Steering Group including survivors' voices.

Summary of recommendations

WRC recommend that:

Objective 1:

- The Greater London Authority (GLA) must ensure a robust gendered analysis is embedded throughout the Strategy.
- The GLA needs to work closely with the specialist women's sector as key partners in the development and implementation of all threads of this Strategy.
- The Strategy must incorporate an intersectional equalities framework to address the impact of VAW on all women. For example, implementing research to identify the specific needs of different groups of women, particularly

marginalised groups, and research to suggest a pattern of provision for services, including services for children and young people.

- The GLA must be a model and champion of the obligations under the Gender Equality Duty for Statutory services and bodies to have specific targets (as well as guidance and training) on disaggregation of data.
- There need to be specific budget lines for the Strategy, including for prevention and for specialist women's services.
- The Strategy needs to be mainstreamed and integrated across all London boroughs. It is crucial that all local authorities are committed to this Strategy and that it is enforced by the GLA.
- The GLA need to work with Transport for London and the Public Carriage Office to ensure that sexualised images and sexist adverts are not displayed in advertising on the public transport network or taxis, as per established guidelines.
- The GLA need to encourage schools, local authorities and other funders to provide self defence training for women and girls.

Objective 2:

- The GLA need to become a champion for specialist VAW services and work with the London Development Agency (LDA), local government and other funders to develop funding for these services.
- The GLA and LDA need to take the lead in promoting the importance of a funding mix where not all services need to be commissioned and grants are also available. Funding cycles should be at a minimum, three-yearly, and COMPACT compliant and intelligent commissioning and non-competitive procurement should also be encouraged.
- The GLA and LDA should demonstrate best practice by encouraging partnerships to apply for commissioned services to strengthen the sector.
- The GLA should ensure "funding and commissioning criteria that address the needs of marginalised women including through funding specialist women-only services" by including clear guidance for local government and Primary Care Trust (PCT) commissioners about the value, legality and benefits of women-only specialist services and their obligations around delivering and commissioning services in terms of the GED.
- Commissioning guidance needs to include an outcome focus for women and children rather than unit cost in line with statutory guidance on best practice.
- The GLA should lobby the Audit Commission to address VAW through the Comprehensive Area Assessment.
- The GLA should lobby the Local Government Association (LGA) to revise the Equality Standards for local government to include VAW as a specific equalities target.
- The GLA should encourage local government to demonstrate action to involve and consult women's organisations and women survivors of VAW in their local priority setting and service planning to meet their obligations under the Duty to Involve.
- The GLA, LGA and EHRC must encourage local authorities to sign up to the VAW Strategy. At a minimum, this would ensure a gendered analysis of VAW is integrated across local mechanisms and ensure adequate local specialist voluntary and community sector and statutory VAW support is available.

- The GLA, LGA and EHRC must encourage local authorities need to provide effective engagement and support programmes to improve the representation of women’s organisations on local decision making bodies.
- There needs to be gender training for the statutory sector including training funders in gender equality and the GED.
- The GLA must lobby for training on all forms of VAW as a core element of professional qualification, in line with the BPfA requirements. For example there should be mandatory training, developed and delivered, at least in part, by the specialist women’s sector, for professionals working with children on child sexual abuse, forced marriage, FGM and the impact of domestic violence.
- The GLA must implement the proposal set out by Rape Crisis (England and Wales) to fund current women’s voluntary and community sector organisations, which already have expertise and are supporting survivors of sexual violence. The Strategy also needs to acknowledge adult survivors of child sexual abuse (CSA) and the long-term health and other impacts for adult survivors of CSA.
- There needs to be a transparent process for membership and support for groups to be involved in the London VAW Steering Group as well as smaller sub-groups/forums of the Steering Group on particular issues and for particular groups (e.g. Survivors Forum/Experts Forum).
- The Steering Group should be mirrored at borough level by Violence Against Women Forums.
- Child protection policies need to incorporate protection of the mother as key to the children’s welfare and safety.
- The GLA need to implement the guidance and recommendations on women’s mental health Supporting Women into the Mainstream²⁵ into the London Health Inequalities Strategy, including training for all staff on VAW, and single-sex wards as standard practice.
- Any public education campaigns or other work to enable the public to support survivors of violence must be done in conjunction with specialist women’s VAW services.
- The GLA should develop a web-based directory for VAW services in London and boroughs should also have accessible information about local VAW services.

Objective 3:

- The GLA and LDA must lobby the Strategic Health Authority, London Health Commission and NHS London to fund specialist VAW services that health services are referring women onto.
- The GLA and LDA must lobby the Strategic Health Authority, London Health Commission and NHS London to adopt a gendered analysis of VAW and to work with the specialist women’s VAW sector to develop the VAW Strategy.
- The GLA must follow up the action on lobbying the Government to ensure that the introduction of a new resettlement grant for women escaping violent relationships is implemented at a local level.
- The GLA and LDA should ensure specific funding for local authorities to finance services that support women with ‘no recourse to public funds’ (NRPF).

²⁵

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4131070

- The Refugee and Migrants Forum should consider the issue of women with NRPF.

Objective 4:

- The GLA should work with the Metropolitan Police Authority (MPA) to ensure Criminal Justice System (CJS) data collection and collation systems are 'fit for purpose' in order to meet obligations for disaggregation of data under the Equality Duties.
- The GLA and CJS must ensure that courts systematically take domestic violence, sexual violence and childhood sexual abuse into account when making child contact and/or child protection orders.

Objective 5:

- The GLA should ensure there is a gendered analysis in the Youth Crime Strategy.
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- Access for perpetrators must be broadened substantially from a reliance on the CJS.

Monitoring and evaluation:

- The Strategy must develop specific actions, a clear remit about who is responsible for different areas, and how they will be supported to implement it.
- The GLA and LDA should lobby for an extensive prevalence survey on VAW every 10 years.
- The Mayor should encourage and lobby statutory agencies in London to develop appropriate and robust monitoring and evaluation systems, including gender disaggregation on VAW data.
- The GLA should develop a monitoring and evaluation role for the Steering Group including survivors' voices.