



Consultation response

'Together We Can End Violence Against Women and Girls'

Submitted to the HM Government

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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 extensively used the expertise of the End Violence Against Women coalition, in particular 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 the country 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 government departments and policy. And we have drawn from good practice on VAW in other parts of the world.

Over-arching comments

We welcome this long-awaited commitment by the Government to introduce a comprehensive cross-Government strategy on Violence Against Women. This discussion paper represents a starting point for developing a truly integrated strategy. However, much more work needs to be done to ensure this strategy works effectively to prevent and end violence against women.

It is crucial that this strategy is clearly based on the principles of gender equality and human rights, and must provide clear targets and guidance for all levels of government to meet their obligations under the Gender Equality Duty, the Human Rights Act and CEDAW obligations. We appreciate the

acknowledgement in this document that violence against women is both a cause and consequence of gender inequality, and that there are clear obligations under legislation for all levels of government to address this issue as it truly is – as a form of discrimination against women and a gross abuse of women’s human rights. What we need now are clear outcomes, targets and guidance to ensure effective implementation.

In addition, there are frameworks here that need to be understood and applied across all levels of government. Meeting gender equality obligations means identifying and then meeting the different needs of women and men, not a one-size-fits all approach; a gendered analysis, rather than a gender-neutral approach, needs to become the norm. **A gender-neutral approach to ending VAW will fail.** Using a human rights framework means effectively applying the concepts of rights and responsibilities, such as the right to life, to liberty and freedom from discrimination. And there are specific, concrete obligations the UK Government has signed up to, under CEDAW, including to ensure that the Gender Equality Duty is interpreted and applied properly, so that women-only services and other activities of women’s organisations are not negatively impacted upon.

The specialist women’s VAW sector have decades of experience and expertise in meeting the specific needs of women survivors of violence, they have advocates for women survivors’ rights, and they are *change-makers*, campaigning for gender equality. Yet the valuable work they do has not been prioritised or supported enough by the state. The Government seems to lack the understanding that the specialist women’s VAW sector are **necessary allies** in preventing and ending violence against women.

The government needs to work closely with the specialist women’s sector as key partners in the development and implementation of all threads of this strategy.

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 years (WRC, 2009). One in five rape crisis centres have closed in the last five years, and 69% of those remaining identify their funding as unsustainable (WRC and Rape Crisis, 2008). 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 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.

For this strategy to work, the government must urgently address the funding crisis facing specialist women’s organisations, which have been, and continue to be, at the forefront of providing effective, quality support to survivors of violence.

A central requirement of any strategy is developing a sustainable funding framework for core NGO services, as noted by the CEDAW Committee and the UN. For too long VAW services have had to ‘shape shift’ to fit into ill-fitting funding frameworks, and has become a political football bouncing between national and local governments. We are now in the fourth year of emergency funding to secure

the sexual violence sector, with no progress made on making the process either Compact compliant (3 year funding) or timed to limit the stress of late notice of funding. For small organisations such repeated insecurity is intolerable.

The government needs to develop ring-fenced, 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, isn't dependent on a postcode lottery.

Specialist women's VAW services work effectively for women survivors of violence. They are essential to allow women space to name their experiences as violence/abuse and explore what support they need to overcome the legacies.

This provision must be at the heart of an integrated strategy, since it is here that the majority of women who still choose not to report to the police can access specialist support.

A key and defining feature of how women's specialist services work is through providing women-only space and services. Women *want* to access women-only services; they find these services of immense value.

"We use questionnaires where we ask all service users if they value having a women-only service and in 25 years we've never had a service user say that it doesn't matter to them... They actually actively choose women-only services and that's what they prefer if they're talking about the details of sexual violence."
(South Essex Rape and Incest Crisis Centre, quoted in *why women only?*, 2007)

"It's precisely because we don't live in an equal society that it's absolutely essential that there are specific services there for women. It's a human rights issue."
(London Centre for Personal Safety service user focus group, quoted in *why women only?*, 2007)

"We all need time to ourselves, time away from men. If you have nearly drowned, it's going to take you a while to get back in the water."
(Greenwich Asian Women's Project service user focus group, quoted in *why women only?*, 2007)

A poll by ICD Research of a random sample of 1000 women across the UK found that 97% believed women who have been sexually assaulted should have the *choice* of accessing women-only services (WRC, 2007)

Yet many local public sector bodies are getting this wrong, interpreting the gender equality duty 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 their legal obligations under the gender equality duty.

The government needs to provide clear guidance for local government and primary care trusts, including commissioners, about the value and legality of women-only specialist services.

VAW impacts on survivors, their family and friends, and ultimately the whole community. It represents a huge cost to society, and not just in terms of gender inequality and human rights abuses. VAW costs the state an enormous amount of money, because of its vast extent and impact. The cost of one rape alone is over £76,000 (HM Government 2007) and VAW is estimated to cost the state over £40 billion per year (New Philanthropy Capital, 2008).

Yet current funding levels for services to meet the needs of survivors fail to reflect the economic costs of VAW.

The government must acknowledge the true cost of VAW, and fund services accordingly. Budgetary allocations for services, including for specialist women's VAW services, must match the level of investment needed to reduce the economic costs of VAW.

It is imperative that this strategy needs to be addressed across all forms of violence. It must address the historic under-investment of the sexual violence sector and the near invisibility of forms of VAW impacting upon ethnic minority communities, such as female genital mutilation (FGM), so-called honour crimes, forced marriage and the issue of no recourse to public funds.

The No Recourse to Public Funds (NRPF) ruling is discriminatory. CEDAW clearly says that states must respect, protect and fulfil women's human rights, regardless of immigration or other factor. Thus, the NRFP 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.

Specific recommendations from the 2008 CEDAW concluding comments are to establish additional counselling and other support services for victims of forced marriage, and to increase efforts to design and implement targeted FGM prevention strategies and education and awareness-raising programmes.

We urge the Government to ensure that all women have access to safety, support and protection. The strategy needs to address forms of violence specific to minority ethnic communities such as female genital mutilation, barriers to accessing services, no recourse to public services, forced marriage and the need for specialist support.

The VAW Strategy must incorporate an intersectional equalities framework, to address the impact of VAW on all women, including a focus on older women, younger women, lesbian and bisexual women, transgender women, black and minority ethnic women, refugee and asylum seeking women, gypsy and traveler women, disabled women, and poor women. Women who are marginalised and experience high rates of VAW, such as women offenders, women who misuse drugs and alcohol and women with mental health issues, also need to be specifically addressed.

An effective VAW strategy needs to be mainstreamed across government at national and local levels. It will require a significant investment and a shift in ways of working for government to effectively join up its work across government. All central government departments need to be on board with this strategy.

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. Women's organisations are not able to penetrate their Local Strategic Partnerships (LSPs) and have their say in local priority setting, as less than 2% of voluntary and community sector representatives are from the women's sector (Gudnadottir et al, 2007).

Devolution can no longer be an excuse for buck-passing of responsibility for VAW between central and local government. Central government needs to highlight VAW as a specific political priority that all local areas must address.

With the obligations of the gender duty, the wealth of information about the huge extent and destructive impact of VAW, human rights legislation and international obligations under CEDAW, the government has enough reason to make VAW a priority. It needs to truly have the political will to do so.

Prevention is absolutely the key to ending violence against women, and we support the focus on long-term prevention. However, this needs significant investment in public awareness campaigns, work in schools and self defence programmes for women and girls.

We need a comprehensive public education campaign, across 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, and provide solid information for the public to use to support women who disclose experiences of violence. Self defence is a cost effective way of supporting women and girls to resist violence and overcome its legacies.

Women's organisations have led the work on prevention, challenging the attitudes that support VAW and campaigning for legislative changes such as making rape in marriage illegal. **Prevention work needs to learn from the expertise of the specialist women's sector in promoting change.**

We agree that the sexualisation of girls is problematic and needs to be addressed. 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.

This strategy needs to be integrated UK-wide, it should lead to joined up working around the UK, and it needs to link into (and learn from) strategic

working on VAW in Scotland. We need to learn from the lessons of Scotland where ring-fenced funding led to services being secured and expanded.

Given the horrendous extent and impact of violence against women, amounting to what Trevor Phillips (EHRC Chair) has called 'an undeclared war against women', **it is vital that the VAW strategy be developed and put in place swiftly.**

Q1. How should schools encourage young men to treat women and girls with respect, and not to resort to violent behavior?

VAW prevention should form part of the core school curriculum. While some lessons in personal/social education and/or citizenship explore healthy relationships, there are substantial gaps, not least a gendered analysis and a promotion of masculinities which are based on respect for girls and women. Only whole school policies which locate VAW within promoting gender equality and all equalities within the curriculum and wider school organisation will make a substantial difference. We need to find new and innovative ways to integrate different gender constructions throughout the curriculum, and consider gross sexism grounds for disciplinary action.

A 2006 survey revealed that a sizeable minority of young people harbour attitudes that condone VAW, especially coercive sex. Moreover, more than three in four (77%) of the 16-20 year-olds said they did not have enough information or support to deal with these issues (ICM, 2006). This is not surprising since 93 per cent of young people surveyed by the NSPCC in 2006 (n=1,820) received no information about sexual abuse in sex education. Fears of opening a 'can of worms' prevent many schools and teachers from addressing violence and abuse (Mahony & Shaughnessy, 2007).

The current emphasis on bullying has had the unintended consequence of de-gendering work on harassment and intimidation. The Department for Education and Skills produced a pack for schools that even defined 'sexual bullying' as a gender-neutral issue (DfES, 2000), losing the long established connection between sexual 'reputation' and fear of violence constraining the options of girls and young women (Lees, 1993). Prevention work in schools needs to be mainstreamed and needs to begin from fostering an understanding of VAW and sexual harassment as a cause and consequence of gender inequality. Building on this, educational interventions should focus not only on protection advice for girls; but as importantly, boys across different cultures and communities need to be invited into exploration of how practices of different kinds of masculinity and approaches to relationships can be based on principles of human dignity.

Clear guidance and support for educational professionals is needed with respect to forced marriage, crimes in the name of honour and FGM, since all affect school-aged girls and young women. Addressing VAW must also be required in independent schools and state-funded faith schools on a similar basis to state schools, to ensure both non discrimination and equality of access to information and support.

Evaluation of an educational programme devised and delivered by WOMANKIND Worldwide in secondary schools – Challenging Violence, Changing Lives – concluded that whilst young peoples’ attitudes and behaviours normalised VAW, the programme was successful in promoting reflection and change. Both teachers and young people responded positively to opportunities to explore VAW, but the absence of training on gender and violence in teacher-training courses remains a significant gap. This requires mainstreaming VAW into professional and inset training.

Experience in Scotland demonstrates that where government endorses a definition and an integrated VAW strategy, it is easier for specialised women’s organisations to offer preventative programmes, as there is a central mandate to work on VAW from a gendered perspective. The Zero Tolerance campaign exemplifies this.

An integrated strategic approach should involve trained professionals delivering proven interventions. Finally, as young women’s safety is the responsibility of the whole school, VAW needs to be integrated into across school policies (Mahony & Shaughnessy, 2007).

Sexual harassment is not being tackled well (if at all) in schools. Sexual harassment should replace the terms sexual bullying, or gender-bullying, which are clunky and open to gender-neutral interpretation.

Recommendations:

- Education programmes on VAW, based in a gendered analysis, should be incorporated across school curricula, including forced marriage, FGM and respectful relationships between girls and boys, and men and women.
- Whole-school policies on VAW should be encouraged, such as responding to sexual harassment clearly and appropriately; clear policies on disclosure; access to specialist training and support for students; disciplinary action for gross sexism, etc.
- Training on gender and VAW should be introduced in basic teacher training, given priority in Post Graduate Certificate of Education (PGCE) programmes as well as in-service learning and Continued Professional Development (CPD) for teachers and head teachers. Schools need to understand the legal requirements placed on them by the gender duty and human rights legislation, to frame VAW as an issue of gender inequality and human rights abuse.
- Modelling good, healthy relationships between the genders amongst school staff and from staff to pupils, and by modelling a healthy relationship between the school and parents.
- Working with children and young people on their understanding of masculinity and femininity, gender based assumptions and expectations and in particular with young men on any gendered beliefs and attitudes of entitlement they may have, and with young women on their sexual autonomy, body awareness and assertiveness skills.

- Inspection systems (such as Ofsted) should include audits of how well schools are implementing strategies for responding to and preventing gender based violence as a mandatory requirement.
- A whole school approach to gender equality would work across the curriculum, using PHSE and SRE but also other subjects. Maths, English, Drama, Art, History, Geography, IT, Media studies and many other mainstream subjects can contribute by focusing on specific aspects of gender equality and violence against women.
- These programmes and skill building for young people need to happen not just in schools, but across a range of access points, particularly to reach young people not engaged in formal education.
- Elements to include across the curriculum could include, at a minimum:
 - Construction of identity theory. Young people need to learn about how they develop their sense of self, how they interact with and make sense of dominant cultural discourses.
 - Social construction of gender - social and cultural ideas about what it means to be male or female; ideas about what kinds of behaviour is socially acceptable for men and for women; understandings of the narrow confines of dominant construction of masculinity and femininity, and how to create space for challenging these dominant cultural ways of 'doing' gender.
 - History of the women's movement, including the campaign of the suffragettes.
 - Current day feminism, including the specialist women's sector – how today's women's movement is still working for gender equality and women's human rights.
 - Gender Equality – the historic and embedded power imbalance between the gendered relations; the legislation and policies that are working towards true equality, VAW as a cause and consequence of gender inequality.
 - Violence Against Women, exploring both the different ways VAW is manifest, and the common factors of control, power over and manipulation, based upon ideas of male privilege and dominance
 - Critical thinking skills – this is a fundamental skill outcome, which allows young people to identify, question and challenge dominant discourses.

Q2. How do social attitudes towards girls and women affect the problem of violence against women?

Challenging VAW requires challenging narrow constructions of gender and unequal power relations

The first step must be to acknowledge the nature of the problem. VAW is both a cause and consequence of gender inequality. Women and men in our society have unequal access to social and economic power. Community and societal ideas of what it means to be a man and to be a woman contribute to the problem of violence by supporting the traditional gendered power-imbalance. Attitudes and beliefs about gender are learned, and society often teaches deeply held sexist

views (Commonwealth of Australia, 2009). These dominant cultural ideas about gender are rarely explored and often seen as 'the natural order of things', eg, beliefs such as 'men are stronger than women' or 'men cannot control their sexual urges'.

A 2005 Amnesty International Poll found that 1 in 3 people believed a woman was partly to blame for sexual violence committed against her if she had been drinking or wearing revealing clothing. A 2009 poll for the Home Office recently found similar results, suggesting that such attitudes are deeply entrenched in cultural beliefs.

There are numerous myths and lies about why VAW happens and who is responsible for it that are located firmly in notions of male privilege and unequal power relations. Despite these ideas shifting over the last twenty years, due in large part to campaigning by the women's sector, significant sections of the community, both men and women, still accept ideas and beliefs that serve to shift responsibility from the perpetrator to the victim, blaming women and girls for gendered violence and excusing the perpetrator.

These ideas and beliefs are still held by some jurors, police officers, social service workers, counsellors, judges, health workers, etc. These pervasive ideas make it very difficult for survivors to tell what is happening or has happened to her, and ignorance surrounding why VAW happens means few women get supportive, appropriate responses when they do tell. Well meaning responses without a gendered analysis or an understanding of constructions of gender and attitudes to VAW, can serve to support ideas of blame for the victim.

Yet women do speak out about their experiences. The women's movement and the specialist women's VAW sector helped to create a supported space where women began to break the culturally imposed silence of shame and invisibility, to talk about what it meant for them to have experienced rape, or child sexual abuse, how they have dealt with their legacy of abuse, and what services and support they find works best for them. Survivors voices' should be at the centre of the development of this strategy.

Men also have a role to play in challenging VAW, by challenging other men's sexist or violence behaviour. This is clearly not just 'a women's issue'. Non-violent men gain much in their lives, such as equal relationships, sharing of power, mutual respect, greater opportunities for intimacy, etc. Sharing these values as well as condemning practices of abuse and misogyny will help to challenge VAW.

Women's organisations historically and currently have led the work on prevention, challenging the attitudes that support VAW and campaigning for legislative changes such as making rape in marriage illegal. Prevention work needs to learn from the expertise of the specialist women's sector in promoting change.

Sexualised images of girls is a serious problem contributing to VAW

The glamourising and normalising of violence and aggressive male stereotypes in the media and on the internet perpetuate negative attitudes and behaviour towards women. Many studies have identified a relationship between tolerance for

physical or sexual violence and an exposure to sexist imagery in television, film, advertising and electronic games. These studies conclude that excessive consumption of imagery which idealises an aggressive, insensitive notion of masculinity, is likely to enhance violence-supportive attitudes. This is even more evident in the case of pornography (most of which overtly portrays women in an unequal role to men) (Commonwealth of Australia, 2009).

Women and girls are more likely to be sexualised and objectified than men and boys in a wide range of media and cultural practices. A large body of evidence demonstrates the connection between the sexualisation of women in the media and popular culture with violence against women. Studies have shown that adults exposed to sexually objectifying images of women from mainstream media are significantly more accepting of rape myths, sexual harassment, gender role stereotypes, and inter-personal violence than those who were in controlled conditions. The American Psychological Association has also raised concerns about the effect of both the sexualisation of girls and the sexualisation of women as girls (for example in advertising and pornography) on the incidence of child sexual abuse – which is known to disproportionately affect women. In the U.S., the 1986 Attorney General Commission (known as the Meese Commission) found a causal relationship between exposure to violent pornography and acts of sexualised violence against women.

The sexualisation of popular culture and the ubiquity of sexualised imagery of women are described frequently by women as conducive contexts for VAW. Girls and women are subject to sexualised messages through daily exposure to television, music videos/lyrics and films, advertising, magazines, computer games, toys and clothing and the Internet (American Psychological Association, 2007). Such representations serve to value females primarily for their 'sex appeal' rather than creative or intellectual abilities, and in doing so reinforce gender inequality. They also undermine information campaigns about healthy sexual relationships.

Nearly half of teenage girls in one survey reported feeling guilty for refusing sex; expressing confusion about their right and capacity to 'say no' (NSPCC/Sugar, 2006). Further evidence is contained in a study of 2,081 young people in Rochdale, which found that pornography influences young men's expectations of sexual relationships, 'lead[ing] to pressure on young women to comply' (Redgrave & Limmer, 2005:22). A recent report by the Independent Advisory Group on Sexual Health and HIV (IAGSHH) identified the sexualisation of toys and product advertising as direct influences on young people's sexual behaviour and values (IAGSHH, 2007). One consequence can be seen in recent surveys, in which a considerable proportion of young women's aspirations have been reduced to being glamour models and lap dancers. The sale by supermarkets, high street stores and children's toy departments of pole-dancing kits, complete with fake money, demonstrate an increasing encroachment of sexualised activity into the landscape of childhood.

An extensive US review of the sexualisation of girls maintains that 'in this framework, young girls are "adultified" and adult women are "youthified"' (APA, 2007, P13), with harmful consequences for women's well-being and educational achievement. Most significantly, they argue that this sexualised culture affects attitudes towards sexual violence, normalises abusive practices towards children

and generates markets for prostitution. Sexualisation of popular culture therefore, recreates a context that justifies VAW and reinforces inequalities between men and women.

The IAGSHH recommended that the government 'develop contacts within the media to ensure that the messages around sex are positive and not perpetrating negative role models (nice girls/dirty girls etc.) or highly sexualised pornographic images of women' (IAGSHH, 2007).

Sustained media awareness campaigns challenging perceptions will have some effect on public beliefs and behavior.

Women's self defence should be available free to every woman and girl

With respect to the confidence of girls and women to resist violence and to overcome its legacies, women's self-defence – that which focuses on empowerment through knowledge, body awareness alongside some techniques - has proved effective, with a strong evidence base in other European countries, especially the Netherlands and Germany.

Self-defence for women (WSD) is a gender-aware holistic provision. It is an essential part of an integrated approach to ending violence against women and girls, empowers women and girls to respond positively and creatively to different forms of VAW from sexual harassment through to domestic violence, rape and sexual assault, etc. WSD develops women's agency and capacity for effective action, preparing them to better manage risky situations and prevent violence. It encourages independence, autonomy, self-esteem, helps women and girls to make their own choices, to assert their rights to respect and safety, and live lives unencumbered by fear of violence. WSD does not blame women and girls for the violence nor hold them responsible.

Evidence shows it works to prevent, reduce risk and harm, aid recovery and not increase danger. Evidence of studies show women who have self-defence training are more aware of risks, more effective at resisting assault by strangers and acquaintances, and more successful in their resistance. It is relevant both to those who have not been victimised and to survivors. Evaluation of self-defence programmes show WSD is relevant to a wide range of women and girls, is effective in increasing confidence, self-esteem and independence and reducing fear of male violence.

However, it is important to note that not all self-defence training has proven suitable, or delivers positive outcomes. Generic personal safety and self-defence courses, despite being well intentioned, fail to deliver training focused on the needs and experiences of women and girls.

Self-defence training should be made available for girls in schools and youth clubs. The provision can also be made available for women through adult classes and in their work place, linked to other specialist women's sector provision such as refuges and rape crisis centres, and through public sector bodies such as SARC's, PCTs, and as part of sport and health agendas.

Recommendations:

- Survivors voices need to be at the heart of an integrated strategy
- Adequate resources need to be assigned to prevention work
- Prevention work needs to learn from the expertise of the specialist women's sector in promoting change.
- A sustained, comprehensive public awareness campaign is needed to challenge the mythologies and narrow social constructions about gender that condone and excuse VAW. This needs to be developed and delivered in conjunction with the specialist women's VAW sector.
- Awareness raising of the general public should address the extent of gendered violence, its unacceptability, socially constructed ideas about femininity and masculinity, and invite individual women and men to support victims and challenge attitudes that justify/excuse VAW. There needs to be a comprehensive, long-term, multi-faceted public awareness campaign to complement the work done in schools.
- An evidence base needs to be developed about what works best in challenging VAW at a community level, both within the UK and from best practice in other parts of the world.
- Lessons should be learnt from international community based responses to VAW, such as the "We Can" campaign.
- Governments across the UK must address the commodification and sexualisation of women, and the expansion of the sex industry, as part of the cohesion agenda, since it has consequences for access to public space and elevated levels of fear of crimes.
- Self defence for women (WSD) should be recognised as a valuable and cost effective prevention strategy.
- All women should have access to safety, support and protection and no woman should have to pay for self defence.
- Government must ensure that all self defence training has a gendered analysis; does not blame women and girls for violence; is empowering, and learns from the expertise of the specialist women's VAW sector.

Q3. Are we doing enough to protect and support children affected by adult violence? Who's looking out for them and what do they need?

With respect to all violence in families, children are most commonly protected not by state agencies, but by non-abusing carers, most commonly their mothers. In addition, all the research on resilience in children points to the critical importance of having an attachment to a trusted adult. It is for this reason that we have promoted the insight that protecting women is frequently the best form of child protection. This is still not being recognised by children and family services, as many of the child death enquiries attest. At the less lethal levels there are many examples of statutory services, particularly children and family teams in Social Services Departments, still holding women responsible for not leaving or controlling violent men, whilst not acting as a countervailing power. In fact many young social workers are afraid of some of these men – not without reason – but

they expect women who already know what they are capable of, and whose capacities have been diminished by ongoing coercive control, to protect their children from them.

Children are often not protected or supported when they have experienced sexual violence. Communities have little access to information about child sexual abuse e.g. the impact of sexual abuse on the child and the non abusing family members or factual information on who children need to be protected from e.g. sex offenders who offend against children, present themselves as 'nice men', family members. The consistent messages from statutory agencies and government in relation to domestic violence have had some positive influences. The same approach is vital with regard to child sexual abuse and sexual violence generally.

Adult women survivors of child sexual abuse are a 'hidden' and therefore 'ignored' group with complex needs. Women's Mental Health into the Mainstream – Dept. of Health (2002) and national research (World Health Organisation) shows that one in two women in mental health units are adult survivors of child sexual abuse.

This consultation document does not mention adult women survivors of childhood sexual abuse anywhere in the document.

Recommendations:

- Child protection policies need to incorporate protection of the mother as key to the children's welfare and safety.
- Mandatory training for professionals working with children on child sexual abuse, forced marriage, female genital mutilation and the impact of domestic violence. This training needs to be developed and delivered, at least in part, by the specialist women's sector.
- The strategy needs to acknowledge adult survivors of child sexual abuse (CSA); the long-term health and other impacts for adult survivors of CSA; and appropriate, long-term support, such as Rape Crisis centres, needs to be adequately resourced.

Q4. How can we all better pick up on, and respond to, early signs of violence?

The questions are a) how do we create contexts in which women feel safe to choose to disclose and b) how do we ensure that those who do get the support, information and intervention they seek and deserve.

For this to be mainstreamed effectively, we need adequate and sustainable resourcing of specialist VAW services, in order to cope with demand. We already know there is no point in introducing routine screening where professionals have nowhere to refer those who disclose to. So 'picking up on signs' needs to be understood in this wider and deeper context, a context which requires the availability of specialists and specialised services able to respond to the women's diverse support needs, and craft the 'basket of resources' each needs to address her particular situation.

With respect to women in marginalised communities it is even more important to ensure that 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. This requires government at all levels to support those organisations which have created and provide such space, and this has been secular rather than faith based women's organisations.

Helping the supporters of victims requires broadening understandings of VAW, the contexts it occurs in and its impacts. For example, families of women killed in the context of domestic violence were seldom aware that coercive control and jealous surveillance were possibly more significant risk factors than physical assault. Few people understand in any depth that rape takes place in contexts of familiarity and that women will hold themselves responsible. Helplines and web based resources need to begin from this 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. We also reiterate the challenge to enable communities to challenge perpetrators.

Recommendations:

- In order to truly mainstream VAW across public sector services, we need a sustainable specialist VAW sector where professionals could refer women they come into contact with, including services for minority women.
- Any public education campaigns or other work to enable the public to support survivors of violence needs to be contextualised to ensure supporters do not perpetuate stereotypes and increase the victims's feeling of shame and self – blame. This work must be done in conjunction with specialist women's VAW services.
- Public services need training on VAW and gender equality, and how the impacts of VAW can link across many diverse policy and practice areas, eg, mental health, education, employment, etc.

Q5. How best can we keep track of the most serious offenders, and reduce the risks those individuals pose?

Work with perpetrators should not be developed at the expense of services provided to their victims. It is essential that there is parity in service provision.

Despite an emerging international consensus that programmes addressing perpetrators should be part of a co-ordinated response, across the UK provision remains patchy and focused on domestic violence (Coy et al, 2007). Research with perpetrators of domestic violence has revealed that there are some routes, as yet untravelled, for engaging them; for example, a proportion seek help through GPs, but present themselves as in need of support (Hester & Westmarland, 2006). This reinforces both the need for professional training and building the network of

community based programmes, endorsed by the RESPECT network and working with a complex gender analysis (Hester & Westmarland, 2006), which allow for voluntary entry. 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.

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.

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 (Hackett & Masson 2005). Work with adult offenders across crime types has shifted away from what has been deemed a 'confrontational model' which challenged behaviour to an incentive-based 'good lives' approach (see Ward et al, 2006), rooted in the presumption that perpetrators need to be motivated to change (Friendship et al, 2003). It is, however, far from clear how well this approach will work with sex offenders, and the programme lacks a gender perspective. This is despite the fact that crime, and sexual crime in particular, is overwhelmingly perpetrated by males.

Decades of research and practice suggests that an 'appropriate starting point for values in work with sex offenders' is an 'analysis of the operation of gendered power' (Cowburn, 2006). The approach to work with sex offenders needs revisiting. Finally, the Westminster government focus on crime incidents and risk management, driven partly by populist media agendas, has led to work in communities being concentrated on surveillance through the Sex Offenders Register and Multi Agency Public Protection Arrangements (MAPPA). 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:

- Work with perpetrators should not be developed at the expense of services provided to their victims. It is essential that there is parity in service provision.
- 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 criminal justice system, which represents only a small proportion of perpetrators.

Q6. What kind of services should you expect to receive from the health service and/or social services if you were a victim of violence?

Every local authority should have a suite of specialised services for women who have experienced violence. These 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, free at the point of access and can take the form of listening, information and advice, advocacy, counselling, shelter, protection, and self-help.

Survivors of violence should, at a minimum, expect to receive support that is timely; that meets their needs; that is empowering; that has a gendered analysis of violence against women; and that provides access to other services they may need, including independent, women-only specialist services. It is crucial that public bodies are working closely with the specialist women's sector, as these services can complement each other. However, women's organisations need to be better resourced to do this work.

Sexual Assault Referral Centres (SARCs), which are currently unevenly distributed across nations and regions of the UK (Coy, Kelly & Foord, 2007), offer crucial access to medical treatment and routes to legal redress that the specialised women's voluntary/third sector cannot always provide (EVAW, 2008c). Rape Crisis centres provide long-term support and advocacy, women-only space, and are independent from police or the health system. Some Rape Crisis Service users report being referred from (SARCs) to local Rape Crisis Centres (RCC's) for long-term support, whilst the RCCs faced funding crises and were not receiving investment from local Health or Crime and Disorder Partnerships.

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 Services (2006) and the policy document Women's Mental Health: Into the Mainstream 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. Across the nations and regions stakeholders report extreme difficulty in engaging local Primary Care Trusts (PCTs) with the VAW agenda.

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 to enable women to marshal their 'basket of resources' (Sen, 1999). Currently the lack of steer from central government, with the exception of Scotland means that opportunities are missed, and women are still reliant on the knowledge of individuals.

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. Women's

experiences of inadequate and in some cases dangerous, responses are well-documented in research, with the starkest examples being the continuing high profile cases of preventable killings and rape of women and girls.

This knowledge and skills deficit blocks routes to protection, provision and prosecution. While some information on domestic violence has been incorporated into vocational courses for social workers, teachers, and probation officers; there is a woeful absence of mandatory inclusion of VAW across all disciplines. The Beijing Platform for Action (BPfA) requires governments to develop and fund 'training programmes for judicial, legal, medical, social, educational and police and immigration personnel' (UN, 1995).

A whole of government integrated strategy would mandate training on all forms of VAW as a core element of professional qualification and in-service learning. One potential route for implementation is for local and regional partnerships to develop the kinds of training consortia currently operating in Scotland, within which the expertise of the women's sector is acknowledged and used.

Recommendations:

- Local government should ensure it is actively supporting a suite of specialist VAW services, including women-only services, to meet the diverse needs of women survivors.
- Mandate training on all forms of VAW as a core element of professional qualification and in-service learning, in line with the BPfA requirements. One potential route for implementation is for local and regional partnerships to develop the kinds of training consortia currently operating in Scotland, within which the expertise of the women's sector is acknowledged and used.
- Implement the guidance from women's mental health: into the mainstream, including training for all staff on VAW, and single-sex wards as standard practice.
- Statutory services need to learn from the expertise developed within the women's sector in terms of good practice on meeting survivor's needs.

Q7. How can central government, local government and other service providers best work together to promote better consistency and quality of provision in services for victims of violence against women across England?

Acknowledge the vital role played by the specialist women's sector in challenging VAW

The key barrier to sustainable funding for specialist women's VAW services appears to be lack of political will.

Specialist VAW provision has deep roots in the women's voluntary/third sector. Forms of provision that are now considered essential responses to a range of social problems – rape crisis helplines and women centered sexual violence counselling, self-help groups and advocacy, refuges/shelters – all have their origins in 1970s-

80's grassroots responses to rape and domestic violence (Schechter, 1982; Bevacqua, 2000; Dobash & Dobash, 1992). **This provision must be at the heart of an integrated strategy, since it is here that the majority of women who still choose not to report to the police can access specialist support.**

The specialist women's VAW sector have decades of experience and expertise in meeting the specific needs of women survivors of violence, they have advocates for women survivors' rights, and they are *change-makers*, campaigning for gender equality. Yet the valuable work they do has not been prioritised or supported enough by the state. The Government seems to lack the understanding that the specialist women's VAW sector are **necessary allies** in preventing and ending violence against women.

The government needs to work closely with the specialist women's sector as key partners in the development and implementation of all threads of this strategy.

Women's organisations also work with some of the most vulnerable women, including those at risk of revictimisation, many of whom require intensive, long term support. At a policy level, the specialist women's sector must be safeguarded and strengthened and recognition of its social, political and economic contributions.

WRC conducted research into women's organisations in 2006. The key features of women's organisations that emerged are:

- Provision of women-only space
- Integrated 'one-stop shop'
- Focus on empowerment and independence
- Needs-based approach
- Service user involvement and high level of reaching 'hard to reach' women
- Peer support

(WRC, 2006)

Violence against women is the largest subsector of the specialist women's sector, with over a quarter of organisations working directly in VAW (WRC, 2009).

Yet research has highlighted the fragility of such services, with almost three quarters of Rape Crisis Centres in England and Wales describing their funding situation as 'unsustainable' (WRC & Rape Crisis, 2008). One in five women's organisations has closed down in the last five years. The government's own figures showed that only 1.2% of central government funding to the voluntary and community sector went to women's organisations (Mocroft et al, 2004).

In 2006, a 'snapshot' audit conducted by the Women's Resource Centre (WRC) of 26 different central government funding streams found that one in three gave no grants to women's organisations. On average, only 2.28% of funding went to women's organisations. Women's and lesbian, gay, bisexual and trans organisations were the most consistently under-funded sectors out of the equalities strands, and by considerable amounts (WRC, 2006).

As part of WRC's 2006 response to HM Treasury's consultation the Third Sector

Review, 90 representatives of women's organisations were surveyed about the future prospects of their organisations:

- 46% had been forced to make staff redundancies or not renew contracts in the 12 months previous
- 29% were paying staff salaries out of their reserves
- 41% ended a project or closed a service in 2005/06 due to lack of funds (WRC, 2006).

The recently launched *Map of Gaps 2* research found that, over the last 12 months, investment in the violence against women sector has been focused on statutory services and criminal justice based responses - 60% of all new services mapped are located here, whereas in the women's voluntary and community sector, specialised services have remained static or in some cases diminished.

Imkaan reports that 50% of specialist Black, Asian and minority ethnic violence against women organisations have closed in the last five years (Imkaan, 2008). 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 (WRC, 2007).

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 years (WRC, 2009). One in five rape crisis centres have closed in the last five years, and 69% of those remaining identify their funding as unsustainable (WRC and Rape Crisis, 2008). 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 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.

For this strategy to work, the government must urgently address the funding crisis facing specialist women's organisations, which have been, and continue to be, at the forefront of providing effective, quality support to survivors of violence.

A central requirement of any strategy is developing a sustainable funding framework for core NGO services, as noted by the CEDAW Committee and the UN. For too long VAW services have had to 'shape shift' to fit into ill-fitting funding frameworks, and has become a political football bouncing between national and local governments. We are now in the fourth year of emergency funding to secure the sexual violence sector, with no progress made on making the process either Compact compliant (3 year funding) or timed to limit the stress of late notice of funding. For small organisations such repeated insecurity is intolerable.

The government needs to develop ring-fenced, 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, isn't dependent on a postcode lottery.

Given that VAW is estimated to cost £40.1 billion every year (Jarvinen, Kail & Miller,

2008), bolstering the expertise of specialised women's services that deliver support, and frequently preventative work, is 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 (Matrix Consultancy, 2006).

The government must acknowledge the true cost of VAW, and fund services accordingly. Budgetary allocations for services, including for specialist women's VAW services, must match the level of investment needed to reduce the economic costs of VAW.

"[States should] recognise the important role of the women's movement and non-governmental organisations worldwide in raising awareness and alleviating the problem of violence against women; and facilitate and enhance the work of the women's movement and non-governmental organisations and cooperate with them at local, national and regional levels" (Article 4 of the UN General Assembly Declaration on Violence Against Women 1993).

The argument has been made by government officials that whilst the women's sector should be recognised for putting the issue of VAW on the agenda, service provision should now be mainstreamed into the statutory sector. This fails to acknowledge not only the depth of knowledge which specialised women's sector services have amassed, but also the choices that women themselves make about where to access support. It remains the case not only that a minority of survivors ever choose to report violence to statutory agencies, but that many of those who do are not provided with the range of support they need. And many women want to have the choice of accessing specialist women's services.

Learn from good practice on ring-fenced funding for specialist VAW services

There is no budget line that addresses VAW apart from in Scotland, and even here some of the ring fencing is being removed. This means that ministers and officials have had to find ways to lever funds through current policies and spending rounds, which limits what is possible.

An integrated strategy requires budget lines, including for prevention. While reporting rates increase, demand on existing services will increase too (Sen & Kelly, 2008). Thus a strategic approach to funding must acknowledge that in the short term additional monies are required. The women's voluntary/third sector that delivers specialised VAW support services in England and Wales is poorly served by current funding streams, receiving just over one per cent of central government monies despite comprising seven per cent of all charities (WRC, 2007). Much provision and awareness-raising work relies on grants for time-limited pieces of work or specific projects – 'piecemeal initiatives', as one service provider described them.

Seventy nine per cent of grants to RCCs in England and Wales (2006/7) were for one year or less, which is not compliant with the Government COMPACT

agreement with the voluntary sector (WRC & Rape Crisis, 2008). This generates fragility and unsustainability. There is also 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

In March 2008, the UN Commission on the Status of Women (CSW) focused their agreed conclusions on gender equality and finance. These recommendations to all member states include providing human and financial resources as a core part of responsibilities to achieve gender equality. **Insufficient budgetary allocation and the lack of a gender perspective in economic policymaking are identified as barriers to women's equality.** Specifically, governments are urged to 'ensure that sufficient resources are allocated for activities' and to 'cost and adequately resource national policies, programmes, strategies and plans' relating to gender equality (CSW, 2008: 4-5). Following this, the EU issued a statement reinforcing the view that sufficient financial resources must be made available to achieve gender equality.

The ring fenced funding for Rape Crisis Centres has led to Scotland being the only part of the UK where provision has increased (Coy et al, 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.

Unfortunately, as in England and Wales, the ring fence on Supporting People, which has been the core funding of most refuges and some Rape Crisis centres, is to be removed and monies mainstreamed into local authority budgets. There is considerable anxiety about how secure and sustainable this will leave services and whether the importance of funding specialist VAW work is fully recognised, or echoed across nation and regions.

The Scottish Government 'Concordat' for 2008-2011 requires each local authority to reach a Single Outcome Agreement that is broadly based on national outcomes and directs funding streams accordingly (Scottish Government, 2007). However there is concern in the VAW sector in Scotland that there is no national outcome on VAW, although references are made to tackling significant inequalities, improving life chances for children and young people and lives free from crime. Although allocating funding to VAW services would undoubtedly address all of these aims, without an explicit directive on VAW, there is no obligation for local authorities to adequately resource specialized women's sector support services and prevention programmes.

An integrated strategy adopted by all nations and regions of the UK would promote a standardised budgetary allocation that would make real the obligations of the BfPA and Council of Europe to provide well-funded, specialised women's support

services. We commend the Scottish model of ensuring baseline funding is provided to the third sector specialised women's organisations through a dedicated budget line.

Acknowledge the importance of women-only service provision

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.

"Women feel more confident and relaxed in a women-only space. This enables survivors to concentrate on their healing process. Most of our service users, when they first come to us, tell us that they would find it impossible to use our services otherwise because they would not feel safe." (Rape Crisis centre quoted in *The Crisis in Rape Crisis*, 2008)

WRC conducted research into women-only services and spaces in 2007, to gather robust evidence about the features, impacts of and challenges facing women-only services. Our research with women's services, service users, and the public, identified a number of key points about women-only services:

- Women-only services have far-reaching benefits
- Women want to have the choice of women-only services
- There is a particular need for minority women to run their own specific services.
- Women-only services are mis-understood and not valued by the mainstream

There are a large number of reported benefits of women-only services by specialist women's services and service users themselves. Safety, both physical and emotional, is a key benefit of women-only services. As a result, women feel supported and comfortable. They become empowered and develop confidence, greater independence and higher self-esteem. They are less marginalised and isolated and feel more able to express themselves. Women using these services feel that their voices are heard and listened to. Through sharing their experiences with other women to make sense of the world together, they develop a sense of solidarity. Finally, participants described women-only services as a sanctuary.

The research found that women from all walks of life prefer to use women-only services within a range of different contexts. **Some women in the research stated they would not go to mixed services. Their needs would not be met at all if women-only services did not exist.**

Our random poll of 1,000 women from the public found **that 97% believe women should have the choice of accessing a women-only support service if they had been the victim of a sexual assault.**

One interviewee described the experience of a woman who had tried to access support from a mainstream voluntary and community organisation:

"[A woman who had been raped] had gone to one of the larger mainstream organisations and she said she got to speak to a male volunteer there. He gave her half an hour of his time and told her she had to 'get on with her life', that was probably 'the best thing for her'. This was quite appalling. [...] These mainstream

organisations are often quite well funded and well respected but on the ground the experience is somewhat different, depending obviously on which branch you go to.” (Anonymous interviewee quoted in why women-only?, 2006)

There is a particular need for minority women to run their own specific services. Some groups of women experience greater marginalisation and isolation and have particular experiences as a result of being both female and dealing with the impacts of racism, xenophobia, homophobia, disabilism, class, poverty, health status etc. (often referred to as intersectional discrimination). Women-only services develop to meet need, so those services which are led by and for specific communities of women, such as Black and Minority Ethnic (BME), lesbian, bisexual, older and younger women, lone mothers, mental health survivors etc. are crucial.

“Coming here is a respite, I am grateful that we have got this space to come to. It was a relief when I joined.” (Leicester Lesbian, Gay and Bisexual Centre, service user focus group quoted in why women-only?, 2006)

Services led by and for minority women are necessary in addressing social exclusion and community cohesion. They enable integration through empowering and building the confidence of their service users, and by helping women who are often on the margins of communities to access opportunities that many other people take for granted.

Organisations offering women-only services are the pioneers and lynchpin of specialised VAW provision, yet at the same time the most fragile. They have received less proportional funding than generic organisations; despite recognition of the benefits such services provide (WRC, 2007). 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.

The Crisis In Rape Crisis (WRC and Rape Crisis, 2008) gives numerous accounts of funders, mostly local authorities, stipulating that specialised women’s organisations should, under the new commissioning guidelines, also provide services to men. In one case, a local authority refused to even consider an application from a Rape Crisis Centre unless services for men were also included. Nearly half (42%) of Rape Crisis Centres have been recently challenged by funders about providing women-only services (WRC & Rape Crisis, 2008).

The European Union Council Directive 2004/113/EC (2004) allows the supply of goods and services to be women-only where they are linked to overcoming gendered disadvantage – and services relating to violence are explicitly cited as an example where single sex provision is warranted. The Sex Discrimination Act (1975) also offers similar permission. Although Equal Opportunities Commission guidance and the Code of Practice for the GED reiterates the need to safeguard single sex services, **lack of steer and oversight from Westminster has contributed to the erosion of women-only provision** and has allowed this misinterpretation of the legal position by commissioners of services to persist. An integrated strategy would emphasise the value of specialised women’s organisations and introduce mechanisms to secure their present and future.

As Patricia McFadden (2001) has argued, women-only services are a legacy of the Women's Movement and represent the need for women's rights to self-determination and 'voice'.

"The Committee recommends that the State party [UK government] ensure that non-governmental organizations are able to effectively contribute to the continuing implementation of the Convention. It urges the State party to provide increased and sustained funding to non-governmental organizations and other civil society groups involved in the area of women's rights. It also recommends that the State party ensure that the interpretation and application of the Gender Equality Duty does not negatively impact on the provision of 'women-only' services or restrict the activities of women's organizations. It further recommends that the State party conduct an impact assessment of its 'commissioning' frameworks on the funding of women's organizations. The Committee requests the State party to include information on funding of non-governmental organizations and women's organizations in its next report" (Committee on the Elimination of Discrimination against Women, 2008).

Address the negative impact of commissioning on the specialist women's sector

Current commissioning frameworks at local authority levels pose a further threat to women's specialist VAW services. As highlighted by The Civil Society Almanac 2008, there is a growing trend away from grant aid and towards contracts. In 2005/06, earned income accounted for over half of charities' income (Reichardt et al, 2008). Many third sector organisations, including WRC, believe there is a growing disdain for grants in public policy, and language used by funders and other agencies:

"The term 'grant dependency' is in growing usage. The suggestion is that grant funding breeds dependency, whereas contract funding does not, and that income generation and entrepreneurial activity are hallmarks of organisational maturity" (Curley, 2009).

In fact, and as described in government guidance, grants are necessary to a healthy funding mix and provide greater scope for third sector organisations to identify needs.

Despite government guidance on 'intelligent' commissioning, a number of challenges face women's organisations (and many voluntary and community organisations, generally) in relation to the competitive tendering regime. WRC is deeply 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.

Public bodies are 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. 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" (Ryan-Collins, 2008).

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.

In failing to analyse and address who they contract with, central government and local authorities are missing opportunities to harness the multiple benefits that independent, community based, women's organisations can bring such as: empowering service users; self-help within communities; improving public services; increasing equality and diversity; and tackling social and economic exclusion.

Although it is too early to determine what the *full* impact of competitive tendering will be on the women's sector, there are already worrying signs that the shift in the funding mix (away from grant aid and towards competitive tendering) is likely to further marginalise women's organisations. Smaller and specialist services will be most at risk. Imkaan reports that 50% of specialist Black, Asian and minority ethnic violence against women organisations have closed in the last five years (Imkaan, 2008). 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 (WRC, 2007).

The commissioning guidance is written in such a way, and practice is already showing, that local authorities interpret it to mean that they should prioritise community-based generic services. The guidance implies that it would be exceptional for local and specialised services for particular groups to be funded and that the criteria in such cases should be onerous. Whether by design or by accident, this is damaging and short-sighted, as to not fund specialist services will ensure some of the most excluded individuals are further marginalised. Services that might enable them to rebuild their lives and ultimately integrate and take up a full role in society will disappear. There has been little, if any, recognition in these deliberations of the extensive work the specialised VAW sector has done to make their services accessible to women across a range of forms of disadvantage; few

work with a 'single community', since 'women' encompass all the equality strands. It is debatable whether current interpretations of the commissioning guidance meet due diligence standards for the Race Equality Duty (RED) and Gender Equality Duty (GED) and the race and gender impact assessments that should accompany commissioning; let alone those of the Human Rights Act, Committee on the Elimination of Racial Discrimination (CERD) and CEDAW.

The new commissioning regime for local authorities is further undermining the women's sector, **requiring an urgent directive from Westminster that reiterates international requirements to recognise the expertise of the women's voluntary sector**. It is also essential that additional guidance is issued which states that specialised services are necessary for community cohesion, that they are not only welcome but required if legal standards (such as the GED, CEDAW and Human Rights) are to be met.

An integrated strategy should act as a lever to ensure that government agencies fulfill UN obligations to the women's voluntary sector. An increase in an index of support services, signifying an extension of specialised women's sector provision, is one of the proposed transnational UN indicators on VAW (Erturk, 2008).

Adopting an integrated strategy across the whole of government would build VAW into a number of funding mechanisms, including the Treasury and Comprehensive Spending Reviews (CSR) across devolved nations. The most recent CSR (2007) announced £80 million for organisations 'supporting community action and voice', to be distributed by local grant funders. Under the GED, local authorities will need to consider the different impact of funding decisions on women and men.

In July 2008, the UK government reported to the United Nations Committee on the Elimination of Discrimination against Women on its implementation of the Convention on the Elimination of All Forms of Discrimination against Women. The Committee commended many of the government's initiatives in advancing women's equality, but made a number of concluding observations and recommendations about the women's voluntary and community sector, in particular:

"The Committee notes that changes in the allocation of Government funding from needs-based to 'commissioning' frameworks, and the gender neutral interpretation of the Gender Equality Duty, have negatively impacted on funding to women's organizations and the provision of 'women-only' services, in particular domestic violence shelters and rape crisis centres. Despite the establishment by the Government of an interim short-term emergency fund, the Committee notes with concern the impending closure of a number of rape crisis centres, as well as of domestic violence shelters, women's health organizations and black, minority and ethnic women's organizations (Committee on the Elimination of Discrimination against Women, 2008).

Local understanding and implementation of VAW work needs to be urgently addressed

As evidenced by the EHRC's recent campaign to take action against those local areas with no specialist service provision on VAW, there is a serious problem with

how well 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. This is then apparently providing justification to local government in refusing to adequately fund specialist women's services, or indeed in cutting funding.

There is a huge gap between what the central government says should be happening at a local level, and what is actually happening in practice. We are hearing from our members, again and again, how central government says organisations should be funded locally, and local government says there are no targets to support local funding.

Devolution can no longer be an excuse for local government's failure to understand or act upon VAW and broader gender equality goals generally. It can no longer support the 'buck-passing' game between central and local on who has responsibility for dealing with VAW, and for providing sustainable funding to do this essential work.

This is further compounded by women's organisations' inability to penetrate their LSP and influence their Sustainable Community Strategy (SCS) priorities or their Local Area Agreement (LAA) targets, despite the current focus on community engagement. Research in 2007 found that that only 1.8% of voluntary and community sector representatives on Local Strategic Partnership (LSP) boards were from women's organisations (Gudnadottir, 2007). 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, particularly given their important role in deciding local funding priorities.

Further case study research (Oxfam, soon to be published) has identified a range of barriers to women's groups ability to influence local priorities, such as: lack of understanding of the principles of gender equality, including the need to identify and meet the differing needs of women and men; lack of understanding of their legislative requirements under the gender duty, including the legality of commissioning women-only services; lack of acknowledgment of the value and expertise held by the specialist women's sector; lack of understanding of VAW as a cause and consequence of gender inequality.

There needs to be clear guidance and funding from central government on the need to address VAW strategically, including the need to commission specialist women's services.

There are existing tools which could be strengthened to effectively monitor how local government is addressing VAW.

The CLG's National Indicators (NIs) have few indicators focused specifically on VAW. Those that do need to be finished and implemented promptly. There needs to be a recognition within the NI framework, of how VAW cuts across all policy areas (such as education, employment, health, criminal justice, etc) and therefore applies to a large number of the NIs.

The Audit Commission's Comprehensive Area Assessment (CAA), which is now live, needs to be monitoring how well VAW is being addressed locally through the safety theme, and in terms of local areas meeting their obligations under the equality legislation. This needs to include funding for specialist women's VAW services. It also needs to monitor how well women's organisations and women survivors of gendered violence are able to engage in local priority setting.

As part of the Comprehensive Area Assessment process, The Audit Commission should assess how effectively Local Strategic Partnerships are working proactively to increase the representation of VAW organisations in the LSP structure. This needs to include:

- Ensuring VAW organisations have enough capacity to participate in LSPs
- Ensuring that VAW organisations are strategically placed in the best positions to bring women's concerns to the LSP and to contribute their expertise in gender analysis.

Should there be insufficient evidence of the above, the Audit Commission should generate a red flag specifically for areas that are failing to effectively ensure that VAW organisations are strategically placed in the best positions to bring women's concerns to the LSP. The Audit Commission should also:

- Ensure that LSPs have a good knowledge of the VAW and the cross-cutting impact (eg, on health, education, employment, etc) in their local areas
- Ensure that equalities data is being collected and disaggregated to take account of the needs and experiences of different groups of women
- Generate a red flag specifically for areas that are lacking knowledge about VAW issues.

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', local government should be seen as negligent in meeting this duty if they are not involving and consulting with women's organisations. In addition, considering the devastating impacts of VAW, and the number of women who are marginalised as a result of VAW, local government will need to involve and consult with survivors of VAW.

The IdEA Equality Standard for Local Government also need to be strengthened to include specific targets on VAW to be incorporated, given the extent of VAW as a gender equality issue.

Recommendations:

- Specialist women's VAW service provision must be at the heart of an integrated strategy, since it is here that the majority of women who still choose not to report to the police can access specialist support.
- For this strategy to work, the government must urgently address 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.
- The Scottish model of providing baseline funding for specialist women's VAW services, through a ring fenced budget line, should be introduced

across the UK, addressing the historic under funding of the specialist women's sexual violence sector.

- There must be greater recognition of the importance, and protection of, women-only space for survivors of VAW, in line with CEDAW recommendations.
- Statutory sector funders should respect a survivor's right to choose a women-only space and refrain from supporting and commissioning only generic service provision. The government needs to provide clear guidance for local government and primary care trusts, including commissioners, about the value of women-only specialist services.
- Commissioning guidance should be re-visited to ensure an outcome focus for women and children rather than unit cost, and the value and legality of women-only services and those serving minority women, stressed.
- The government needs to acknowledge the real cost of VAW, and provide sustainable funding accordingly.
- Specialist women's sector services should be secured through local commissioning frameworks that recognise their value to their service users and for public bodies in fulfilling their equalities duties.
- Funding cycles should be at a minimum, three-yearly, and Compact compliant.
- Devolution can no longer be an excuse for buck-passing of responsibility for VAW between central and local government. Central government needs to highlight VAW as a specific political priority that all local areas must address.
- Local government should now be monitored on how well it is addressing VAW through the Comprehensive Area Assessment; the Duty to Involve, and the Equality Standards for Local Government.
- The Comprehensive Area Assessment should monitor local government on how well it is integrating VAW as a local policy priority, including number and resourcing of specialist women's VAW services, and the Audit Commission should flag up where this is not happening;
- In order for local government to meet their obligations under the Duty to Involve, they will have to demonstrate action to involve and consult women's organizations and women survivors of VAW in their local priority setting and service planning.
- The Equality Standards for local government should be revised to include VAW as a specific equalities target.

Q8. How can we improve women's confidence that the criminal justice system is working to protect them?

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 specialist women's services.

For women to be more confident, the attrition rate needs to be addressed. This requires not only a higher conviction rate but also less cases being withdrawn. With

the conviction rate so appallingly low, it is understandable that women do not feel confident that their attackers will be brought to justice.

Recommendations:

- Attrition needs to be effectively addressed in order to increase the proportion of reported cases where offenders are brought to justice.
- Increased reporting needs to be accompanied by increased resources for support and advocacy.
- Nations and regions should implement CJS data collection and collation systems that are 'fit for purpose' in order to meet obligations for disaggregation under the Equality Duties.
- Models of good practice from European countries, such as the Austrian 'removal law', the Swedish emphasis on 'course of conduct' offences, and laws which give statutory rights to victims and enable them to be a party in a legal case, should be considered for implementation in the UK.
- Courts should systematically and thoroughly take domestic violence, sexual violence and childhood sexual abuse into account when making child contact and/or child protection orders.
- The principle and understanding of procedural justice should be promoted across the CJS.
- The local target to encourage reporting must be supplemented by availability of options that increase safety, security, well-being and address the harms of violence.

Q9. What would make your journey at night safer?

The extent and impact of VAW; the prevalence of myths that blame women for attack; women and men's radically different experience and use of public space; and women's high rates of experience of sexual harassment, all seriously impact on women's fear of safety travelling at night.

While explorations on the question are welcome, it needs to be acknowledged that this fear cannot be fixed by better lighting or other safety-focused features alone. Work on reducing women's fear of night journeys needs to be looked at within the context of previously outlined features – gendered analysis, constructions of gender, and ideas about women and men's entitlement to take up space in the world – in order to better understand the construction and experience of this fear. Self defence, creative and supported ways of challenging sexual harassment on the streets, art projects exploring women's use of public space, work with young women and men on exploring and challenging physically embodied notions of entitlement – these are all ideas that would have value in supporting women to feel more confident and present in the world, and therefore in travelling at night.

Recommendations:

- Work on reducing women's fear of night travel needs to be embodied within the context of supporting women to feel more confident in the world.

- This should involve exploring and challenging ideas and experiences of entitlement in public space; ways of challenging sexual harassment; self defense, etc.

Q10. Following completion of the consultation period, the Government will issue a strategy in order to ensure that coordinated activity is undertaken across government to reduce and prevent violence against women.

The specialist women's VAW sector have decades of experience and expertise in meeting the specific needs of women survivors of violence, they have are advocates for women survivors' rights, and they are *change-makers*, campaigning for gender equality. Yet the valuable work they do has not been prioritised or supported enough by the state. The Government seems to lack the understanding that the specialist women's VAW sector are **necessary allies** in preventing and ending violence against women.

A truly integrated strategy needs to address the lack of parity, in terms of political priority and resourcing, across the different forms of VAW. Rape and sexual assault have been more marginalised than domestic violence (although this is still not adequately resourced) and forms of VAW such as FGM and forced marriage even more so. All the forms of VAW, including sexual harassment, must be acknowledged 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. Without measuring the baseline, there will be insufficient knowledge of where the starting point is, and what needs to change. The strategy needs to address forms of violence specific to minority ethnic communities such as FGM, barriers to accessing services, no recourse to public funds or services, forced marriage and the need for specialist support.

An equalities framework, allowing for an intersectional approach to focus on the diverse needs of all women, is essential. Women who are marginalised and experience high rates of VAW, such as women offenders, women who misuse drugs or alcohol and women with mental health issues also need to be specifically addressed.

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.

For government to develop an integrated, joined up approach, across central and local government, will require new ways of working and clarity on responsibility. It is crucial that all central government departments are committed to this strategy. In addition, central government needs to give VAW a clear priority steer at local level.

Recommendations:

- The government needs to work closely with the specialist women's sector as key partners in the development and implementation of all threads of this strategy.
- It is imperative that this strategy needs to be addressed across all forms of violence, addressing the historic under-investment of the sexual violence sector and the near invisibility of forms of VAW impacting upon ethnic minority communities, such as FGM, so-called honour crimes, forced marriage and the issue of no recourse to public funds.
- We urge the Government to ensure that all women have access to safety, support and protection. The strategy needs to address forms of violence specific to minority ethnic communities such as female genital mutilation, barriers to accessing services, no recourse to public services, forced marriage and the need for specialist support.
- The VAW Strategy must incorporate an intersectional equalities framework, to address the impact of VAW on all women, including a focus on older women, younger women, lesbian and bisexual women, transgender women, black and minority ethnic women, refugee and asylum seeking women, gypsy and traveler women, disabled women and poor women.
- An effective VAW strategy needs to be mainstreamed across government at national and local levels. It is crucial that all central government departments are committed to this strategy.
- Devolution can no longer be an excuse for buck-passing of responsibility for VAW between central and local government. Central government needs to highlight VAW as a specific political priority that all local areas must address.
- This strategy needs to be integrated UK-wide, it should lead to joined up working around the UK, and it needs to link into (and learn from) strategic working on VAW in Scotland.
- It is vital that the VAW strategy be developed and put in place swiftly.