

## Response ID ANON-1WEK-1XXD-W

Submitted to **Transforming the response to domestic abuse**

Submitted on **2018-05-31 12:38:10**

### Personal details

**A I understand that there are two versions of the consultation. If I have already completed the short version I will not answer the following questions again: 6, 7, 9, 12, 24, 25, 26, 32, 35, 39, 43.**

Yes

### B What is your name?

**Name:**

Paul Apreda

### C What is your email address?

**Email:**

paul@fnf-bpm.org.uk

### D What region are you in?

**Please select your region:**

Wales

### E Are you responding on behalf of an organisation or as a member of the public?

**Please choose an option below:**

Organisation

### F If relevant, which, if any, best describes you/your organisation?

**Please select one of the options that best describes you:**

Charitable/voluntary domestic abuse organisation

**If none of the above please specify below:**

### G If applicable, please give the name of your organisation/ profession.

**The name of your organisation, if relevant.:**

FNF Both Parents Matter Cymru

## Introducing a new statutory definition of domestic abuse

### 1 Do you agree with the proposed approach to the statutory definition?

Disagree

**Please explain your answer.:**

The problem with this proposal is the issue of threshold is unlikely to be properly defined. The clear intention is to provide the existing definition with a higher status - ie of a statutory definition. This presents a problem because domestic violence and abuse has been broadened by powerful feminist lobbying groups to mean that almost any form of disagreement between intimate partners or family members can now be claimed to be domestic violence.

The greatest problem lies with the creation of Statutory Guidance which will be designed to push professionals such as the police to provide a differential response based solely on the gender of the alleged victim and perpetrator. This is designed to disadvantage men and to make it harder for them to be believed as victims and easier for them to be branded as perpetrators.

It is very clear that the intention of the legislation is to be discriminatory. The phrase 'This could elaborate and provide context on, for example, the gendered nature of domestic abuse and features of abusive relationships' sets out the intention to inform and require services to treat men and women differently - not based on the abuse that they are suffering but on their gender alone.

### 2 Will the new definition change what your organisation does? Please select 1. (This question is for organisations only)

Yes, in a negative way

**Explain how it will change what your organisation does.:**

We anticipate that even more false or spurious allegations of abuse will be made in the Family Court. Data provided to our charity by the MoJ shows that in 2016 almost 50% of Private Law cases contained some form of allegation - often made to secure an advantage in proceedings involving children. Partly this has been fuelled by the requirements to obtain Legal Aid brought in by LASPO but also extends to provide a de facto justification for mothers to exclude fathers.

Regrettably we believe that the legislation will require our charity to become even more involved in the process of supporting men who are themselves abused by suffering a living bereavement by isolation from the children they care about. As a specialist domestic violence support service for men we anticipate a huge rise in demand for our support to advocate for men accused of abuse when they are in fact victims of emotional and psychological abuse through child contact denial.

### **3 How can we ensure that the definition is embedded in frontline practice?**

**Please provide your answer in the box provided:**

Recognising that domestic violence and abuse is a gendered issue must result in a separate strategy for men and for women grounded in their own experiences. Currently frontline services are being trained exclusively by organisations whose ethos is a feminist one. This may be appropriate to understand the experience of women but cannot capture the reality of men's experience of intimate partner violence. Violence against Women (meaning where the victim is female) must be treated as a separate field from intimate partner violence against men - and funding for these two areas should be proportionate and based on the needs of both men and women.

### **4 What impact do you think the changes to the age limit in the 2012 definition have had?**

Don't know/no answer

**Please explain your answer.:**

### **5 We are proposing to maintain the current age limit of 16 years in the statutory definition – do you agree with this approach?**

Don't know/no answer

**Please explain your answer.:**

## **Educating young people on relationships**

### **6 In addition to the changes being made to how relationship education will be taught in schools, what else can be done to help children and young people learn about positive relationships and educate them about abuse?**

**Please provide your answer in the box below::**

Relationship education in Wales since the Violence against Women, Domestic Abuse and Sexual Violence (Wales) 2015 has shown that the experience of men and boys will be subsumed within an overwhelming feminist ideology. One aspect of positive relationship education that should be included is a module around shared parenting of children. This could be tailored to delivery for any age - with younger children learning about the importance of positive father involvement while older children would explore the breaking down of gender roles in parenting to balance the care giving they are likely to be providing when they become parents. The importance of shared parenting is not simply an issue for men seeking to play a greater role but also as a fundamental element in closing the Gender Pay Gap through the elimination of the 'motherhood' penalty in the workplace.

## **Reporting domestic abuse to statutory agencies**

### **7 Which statutory agencies or groups do you think the UK Government should focus its efforts on in order to improve the identification of domestic abuse? Please tick your top 3 from the list.**

Health professionals, Police, Social workers

**If you selected other please add your response here::**

### **8 In addition to improving training programmes and introducing guidance, what more can the government do to improve statutory agencies' understanding of domestic abuse?**

**Please explain your answer:**

Domestic violence and abuse is a gendered phenomenon. All of the existing training is focussed on the primacy of the experience of the female victim / survivor and is designed to reinforce the view that men are abusers. The example of the IRIS project again reiterates that point.

Training about the experience of male victims - must also be available and funded proportionately. The training must be grounded in the experience of men and cannot be delivered by organisations with a feminist ethos such as Respect or Women's Aid.

Training about men's experience must also encompass the revised advice produced by the EHRC and shared with Welsh Government and the Home Office stating that using different assessment tools on male and female victims is unlawful under the Equality Act 2010

## **Alternative ways to report domestic abuse**

### **9 What further support can we provide to the public (employers, friends, family, community figures) so they can identify abuse and refer victims to help effectively?**

**Please give answer below:**

Once again it is abundantly clear from the information that the Government shares in this section that all of the efforts to improve funding, services and awareness of domestic violence and abuse is focussed on female victims.

Data from ONS demonstrates that Male victims (39%) are over three times as likely as women (12%) not to tell anyone about the partner abuse they are suffering from. Only 10% of male victims will tell the police (26% women), only 23% will tell a person in an official position (43% women) and only 11% (23% women) will tell a health professional. ONS BCS Focus on Violent Crime and Sexual Offences 2014/15 <http://bit.ly/1p8CGI0> Table 4.28 on Appendix Table:

<http://bit.ly/1M1diC5>

Despite these facts the Government again emphasizes the significant resources for female victims with the 'Ask Me' initiative stating that:

'The training also includes how ask me ambassadors can respond in a supportive and understanding way to ANYONE that shares their personal experiences of domestic abuse.' Given that this is an initiative of Women's Aid why would the Government imagine that it will be responsive to the needs of male victims of abuse - who are statistically less likely to recognise that what they are experiencing is abuse AND are more likely to be disbelieved or their experience minimised by statutory and third sector services.

Separate appropriately funded service for men - grounded in their experience - and funded proportionally according to need are essential if the Bill is not to fall foul of equalities legislation.

## **Improving support services for all victims of domestic abuse and their children**

**10 We are in the process of identifying priority areas for central Government funding on domestic abuse. Which of the following areas do you think the UK Government should prioritise? Please select up to 3.**

Advocacy for victims to enable them to stay safely in their own home (Independent Domestic Violence Advisors or their equivalent), Therapeutic services to help victims of domestic recover from their experience, Helpline services for those affected by domestic abuse to call for advice and support

**If you selected other please add your response here:**

**11 What more can the Government do to encourage and support effective multi-agency working, in order to provide victims with full support and protection? Please select up to 3.**

Guidance, Incentives through funding, Training

**If you selected other please add your response here:**

The difficulty here is illustrated again by the examples that have been given. The section is titled 'Improving support services for all victims of domestic abuse and their children' yet the examples simply either explicitly exclude men who are victims or fail to engage with them to any meaningful extent.

## **Supporting victims with specific needs**

**12 What more can the Government do to better support victims who face multiple barriers to accessing support?**

**Please give answer below:**

Simply establish dedicated services grounded in the experience of each of the major groups of victims / survivors.

In the examples you refer to the Men's Advice line run by Respect. This is a feminist organisation whose core business is tackling male perpetrators of abuse. We understand that the Mens Advice line uses an assessment framework to determine whether individuals who contact them for support are 'genuine' or whether they are perpetrators masquerading as victims. This practice is not mirrored in services for women and constitutes direct discrimination. We are therefore calling on the UK Government to cease funding for Respect and ensure that appropriate funding is made available to support and develop services for male victims of abuse that are grounded in their own experience and needs. Feminist organisations do a fantastic job in standing up for and supporting the rights of women. Long may that work continue to be supported by appropriate funding. Male victims do not want to be supported by feminist organisations and neither should they be expected to seek help from a perpetrator organisation.

## **Supporting female offenders**

**13 How can we work better with female offenders and vulnerable women at risk of offending to identify their domestic abuse earlier? Please select your top 3.**

Don't know/no answer

**If you selected other please add your response here::**

**14 How can we make greater use of women-specific services to deliver interventions in safe, women-only environments? Please select your top 3.**

Don't know/no answer

**If you selected other please add your response here::**

## **Supporting those with difficulties getting financial support**

**15 In addition to reviewing who may be eligible for the Destitute Domestic Violence Concession, what other considerations could the Government make in respect of protecting domestic abuse victims with no recourse to public funds?**

**Please give answer below:**

We have no experience of the Destitute Domestic Violence Concession

## **Keeping victims safe – creating a new domestic abuse protection order**

**16 Do you agree that the Domestic Abuse Protection Notice issued by the police should operate in broadly the same way as the existing Domestic Violence Protection Notice (except that it would also be able to be issued in cases of abuse which do not involve violence or the threat of violence)?**

No

**Please explain your answer.:**

This is a dangerous initiative that will effectively criminalise the slightest disagreement between partners, ex-partners or family members. Using the proposed 'Statutory Definition' it should be possible for anyone to seek a Notice from the Police or an Order from a Court that encourages a combative approach to resolving disagreements - for example over the occupation of property or the care of children by launching a pre-emptive strike. This is already the case with the huge number of Non Molestation Orders granted - particularly on a Without Notice basis.

It is envisaged that support services could apply for these orders. The reality of the imbalance in resources between those organisations that support women and those that support men will further exacerbate the problem.

**17 Which of the following individuals/organisations should be able to apply for a Domestic Abuse Protection Order? Please select all that apply.**

The victim, The police (following the issue of a Domestic Abuse Protection Notice or at any other time), With permission of the court, any other person or organisation

**If you selected other please add your response here::**

**18 Which persons or bodies should be specified by regulations as 'relevant third parties' who can apply for a Domestic Abuse Protection Order on a victim's behalf? Please select all that apply.**

None of the above

**If you selected other please add your response here::**

**19 We propose that there should be multiple routes via which an application for a Domestic Abuse Protection Order can be made, including:**

No

**If you chose Yes or No, please explain your answer::**

These proposed new powers are disproportionate and likely to bring about miscarriages of justice on an unprecedented scale.

**20 Do you agree that family, civil and criminal courts should be able to make Domestic Abuse Protection Orders of their own volition during the course of any proceedings.**

No

**If you selected Yes or No, please explain your answer:**

There is no evidence that the existing powers - which are already used disproportionately - require strengthening. The pathways proposed will further reduce the incentives for parents to agree a shared care arrangement for their children. The proposals will further incentivise a 'pre-emptive strike' to seize children and secure an advantage at the start of the process through an Order granted on the balance of probability AND more likely than not Without Notice to the other party. The draconian powers proposed for the Order will result in huge civil liberties problems and shameful miscarriages of 'justice' that will further diminish the reputation of the British justice system

**21 Do you agree that courts should be able to impose positive requirements as well as prohibitions as part of the conditions attached to the proposed order?**

Not Answered

**If you selected Yes or No, please explain your answer:**

Whilst the intention is laudable the likely effect of what is proposed will result in significant civil liberties issues

**22 Do you agree that courts should be able to require individuals subject to a domestic abuse protection order to notify personal details to the police?**

No

**If you selected Yes or No, please explain your answer::**

Once again this represents a further erosion of civil liberties - particularly as most of the proposed Orders are likely to be made Without Notice and on the balance of probabilities.

**23 If you selected 'Yes' to question 22 what personal details should the courts be able to require individuals to provide to the police? Select all that apply.**

None of the above

If you selected other please add your response here::

**24 Do you agree that breach of the proposed order should be a criminal offence?**

No

If you selected Yes or No, please explain your answer:

The problems caused by the decision to criminalise breach of Non Molestation Orders should have rung alarm bells in terms of providing criminal penalties for breaches of civil orders overwhelmingly made Without Notice to the party who is the subject of the Order. If DAPOs are to have criminal penalties then all civil orders should be treated the same - including Child Arrangement Orders.

The administration of justice requires the adoption of a balanced approach. For too long the argument has been a one sided one in which women demand greater and greater protection from real or imagined dangers. Of course we need civil and criminal sanctions to protect, deter and prevent behaviour unacceptable to society but the danger in this specific case is of the imposition of a sanction that will be exploited and manipulated to seek advantage in an already difficult and contentious period for separating couples.

**25 If you do agree that breach of the proposed order should be a criminal offence, should it be possible for breach to alternatively be punished as a contempt of court?**

Yes

If you selected Yes or No, please explain your answer:

This is a much more sensible way for the proposed Order to be enforced.

**26 Do you agree that courts should be given an express power to impose electronic monitoring as a condition of a Domestic Abuse Protection Order?**

No

If you selected Yes or No, please explain your answer:

This would represent a further erosion of civil liberties and a gross miscarriage of justice given the process by which these Orders will be applied for.

**27 Which particular statutory safeguards relating to the use of electronic monitoring with Domestic Abuse Protection Orders should be put in place?**

Please give your answer below:

We do not believe that electronic monitoring is a proportionate response however if it is adopted then a criminal burden of proof needs to be met before the provision should be applied.

### Anonymous registration

**28 How much easier do you think it will be for domestic abuse victims to register to vote anonymously, once the changes summarised above happen?**

Don't know/no answer

**29 What further support could survivors receive to prove their safety would be at risk if their name and address appeared on the electoral register? Please put forward one suggestion.**

Please give your answer below:

Don't know

**30 Do you have any further comments or suggestions on how to make it easier for domestic abuse survivors to anonymously register to vote?**

Please provide your answer:

No

**31 Aside from anonymous registration, how else can we keep victims' addresses safe?**

Please provide your answer in the box below::

Don't know

### The Domestic Violence Disclosure Scheme

**32 Before reading this consultation, were you aware of the Domestic Violence Disclosure Scheme (Clare's Law)?**

Yes

**33 Do you agree the guidance underpinning the Domestic Violence Disclosure Scheme should be put in to law?**

Disagree

**Please explain your answer:**

We do not believe that the existing scheme, using the police's common law power to disclose information where it is necessary to prevent crime, results in difficulties in protecting victims of abuse.

**34 How do you think we can best promote awareness of the Domestic Violence Disclosure Scheme amongst the public?**

Don't know/no answer

**Use this box to explain your answer or if you selected 'other':**

**Economic abuse**

**35 What practical barriers do domestic abuse victims face in escaping or recovering from economic abuse and how could these be overcome?**

**Please give your answer below:**

Men often face a period of economic hardship following divorce or separation as they typically leave relationships with fewer assets eg they leave the family home etc. We have many service users who are left paying for the mortgage on a home and loans taken out when they were living with an ex partner - yet also have to try to rebuild their lives from scratch.

A major form of economic abuse faced by male victims relates to the statutory Child Maintenance system which provides for a financial incentive for primary carers to prevent child contact. We appreciate that such changes are beyond the scope of the current legislative proposals.

**Online threats and the role of technology in domestic abuse**

**36 What more can we do to tackle domestic abuse which is perpetrated online, or through control of technology?**

Effective use and handling of evidence from social media within the investigation and prosecution processes

**Use this box to explain your answer or if you selected 'other':**

**Improving the police response**

**37 How can we continue to encourage and support improvements in the policing response to domestic abuse across all forces and improve outcomes for victims?**

**Please give your answer below:**

Training is a major issue. We are aware that the College of Policing and other local initiatives are driven by a feminist interpretation of domestic violence that sees domestic violence and abuse as a cause and consequence of gender inequality. This informs the approach taken on the frontline by officers who will respond to a domestic abuse incident call out presuming that the perpetrator is male and the victim is female.

In recognising that men and women can be both victims and perpetrators of abuse it is necessary that funding and commissioning of training should be on a balanced basis - with organisations that understand and reflect the male victim perspective also contributing to training.

Resourcing of dedicated services for male victims would also enable police to signpost men who they suspect of being a victim of abuse to receiving appropriate help and support. Currently we invariably see either a failure to offer men any help or the lunacy of signposting them to feminist services.

**Improving victims experiences of the justice system**

**38 Do you think creating a legislative assumption that all domestic abuse victims are to be treated as eligible for assistance on the grounds of fear and distress (if the victim wants such assistance), will support more victims to give evidence?**

No

**If you selected Yes or No, please explain your answer:**

The more the Government and others 'incentivise' the making of allegations of abuse the greater the likelihood that individuals will take advantage of the conditions to achieve an advantage in disputes.

**39 Is there more this government could do to explain the range and remit of existing measures for victims to help support them in the criminal justice process?**

Don't know /no answer

**If you selected Yes, please explain your answer:**

**40 Do you know of instances in criminal proceedings when an application to prevent cross-examination of a victim by an unrepresented defendant has been denied in a domestic abuse case?**

No

If you selected Yes, where possible, please provide evidence or details of the experience to support your answer.:

**41 Do you think extending the prohibition on cross-examination in criminal proceedings would support more domestic abuse victims to give evidence?**

No

If you selected 'Yes' or 'No' please explain your answer:

We know of no substantial examples where the current provisions are inadequate. In relation to the Family Courts the MoJ has already produced research that shows that the cross examination of alleged victims by alleged perpetrators in the Family Court is not a significant issue.

On page 6 of the report it states:

'During March to May 2015, 124 relevant hearings were identified where there was the actual or potential cross-examination of a vulnerable or intimidated witness by a litigant in person accused of domestic abuse. This was based on a response rate of 89 per cent of all courts that hear private family law cases. In 34 of these 124 hearings, the litigant in person cross-examined a vulnerable witness, either directly or indirectly'

[https://www.familylaw.co.uk/system/froala\\_assets/documents/1506/moj-research-alleged-perpetrators-of-abuse-as-litigants-in-person.PDF](https://www.familylaw.co.uk/system/froala_assets/documents/1506/moj-research-alleged-perpetrators-of-abuse-as-litigants-in-person.PDF)

By way of comparison applications in Private Law in the preceding 3 months (Jan – March 2015) were 9,861. This represents a prevalence (based on the 34 cases identified) of 0.34%

## **Prosecution without victim's evidence**

**42 Do you have suggestions for how we can better support prosecutions through to conclusion, including providing better support for witnesses who currently disengage from the process?**

Don't know /no answer

If you selected 'Yes' please explain why and, where possible, providing evidence or details of the experience to support your answer.:

**43 What more can police, witness care units and the Crown Prosecution Service do to support victims through the justice process from the point of report onwards?**

Where possible, please provide evidence or details of the experience to support your answer.:

**44 Are there other aspects of the criminal court treatment of vulnerable people which the family court could learn from?**

No

If you selected Yes, please explain why:

## **Coercive or controlling behaviour offence**

**45 Do you think there is further action the government could take to strengthen the effectiveness of the controlling or coercive behaviour offence?**

Yes

Please give further detail.:

Remove section 76 2(b) - the requirement that the parties A and B live together for the offence to be committed.

We know from ONS data that the incidence of domestic violence and abuse increases following separation of parties. It therefore makes logical sense to enhance the protection for victims of coercive and controlling behaviour by removing this section that prevents the abuser from being charged with the offence if he/she is no longer living with the victim.

## **Aggravating factors in sentencing**

**46 Do you think the current approach of using sentencing guidelines, as per guidelines issued in February 2018 is effective in ensuring sentences imposed reflect the seriousness of domestic abuse when it involves children?**

Don't know /no answer

If you selected Yes or No, please explain why.:

**47 Is a statutory aggravating factor needed in order for the court to reflect the seriousness of offences involving domestic abuse and children in sentencing?**

Don't know /no answer

If you selected Yes or No, please explain why.:

**48 Please share any other views on how to ensure domestic abuse and its impact on children are taken into account in sentencing?**

**Please provide your answer below:**

The emotional and psychological abuse of children who experience parental alienation by the actions of a controlling parent needs to be recognised clearly by the Justice system.

s66 of the Serious Crimes Act 2015 criminalised the psychological abuse of children. We do not know of any case where the Police and CPS have brought charges against a parent under this provision for parental alienation offences.

## **The Istanbul Convention**

**49 Do you agree that taking extraterritorial jurisdiction over these offences is sufficient to satisfy the requirements of the Convention?**

Don't know/no answer

**50 If you answered 'No' to question 49 what additional offences do you think we should take extraterritorial jurisdiction over and why?**

**Please provide your answer below:**

**51 Do you agree that relying on the civil law remedy in the Protection from Harassment Act 1997 is sufficient to satisfy the sexual harassment requirements of the Convention?**

Yes

**52 If you answered 'No' to question 51, what do you think is necessary to satisfy those requirements?**

**Please provide your answer below:**

## **Preventing reoffending**

**53 Do you agree we should explore (with the Crown Prosecution Service) further controlled and monitored use of conditional cautions with rehabilitation programmes than is currently permitted for lower-level, normally first time domestic abuse incidents?**

Don't know /no answer

**If yes, please explain your answer suggesting what procedures should be in place to ensure a conditional caution would only be given in appropriate cases with appropriate conditions attached.:**

**If you answered No please explain your answer.:**

**54 Do you have any additional evidence on current conditional caution practice which we should consider in relation to this issue?**

Don't know /no answer

**If you answered Yes, please explain your answer.:**

## **Managing serial and repeat offenders**

**55 What changes to current policies or procedures would help police and other agencies to better manage serial and repeat abusers, in particular those who are not subject to a sentence of the court?**

**Please give your answer below:**

Don't know

## **Working with perpetrators to change their behaviour**

**56 What more could be done to work with perpetrators in prisons, particularly offenders who receive a sentence of less than 12 months and do not have sufficient time to complete a domestic abuse programme in custody?**

**Please give your answer below:**

We challenge the concept that has become established by Respect that perpetrator programmes must have a minimum duration of 26 weeks.

Having observed MARAC meetings it is clear that child contact disputes underpin many of the cases that are heard in these fora across the country. We believe that resolving child contact issues for those individuals sentenced to short custodial sentences should be a priority to avoid further conflict on release

**57 What more could be done to work with perpetrators in the community (convicted or non-convicted) to change their behaviour?**

**Please give your answer below:**

There is a dangerous presumption at work in this area that a person accused of abuse is by definition 'guilty' and needs to 'change their behaviour'. We appreciate that feminist organisations will immediately come forward with examples of cases where serious physical injury or death has occurred to a woman to justify ever more 'action' to be taken to address what they perceive to be abusive behaviour. Much of the thinking underpinning the proposed legislation is driven by the desire to do more - to go further - to protect women from abuse. Justice demands balance - and for every woman killed by a male partner or ex-partner each year more than 10 men kill themselves because they have been deprived of a relationship with the children they care about. Women (and it is overwhelmingly



women) who use children as weapons to 'punish' or hurt a male ex-partner are guilty of emotional and psychological abuse. This is not currently recognised by the justice system - and needs to change. Paradoxically the proposed introduction of the new Domestic Abuse Protection Order will provide a pathway for fathers to seek redress through the justice system when they are unlawfully deprived of contact with the children they care about.

## Improving performance using data

**58 Please select which of the following you believe should be priorities for improving data collection. Please choose up to 3.**

Improving the collection and reporting of data on when domestic abuse is a feature of a case/ intervention, Improving collection and reporting of data relating to the gender and relationship of the perpetrator and victim, Improving data to enable better tracking of outcomes in domestic abuse cases/ intervention

If you selected 'Other' please add your response here::

## Establishing a Domestic Abuse Commissioner in law

**59 Do you agree with the proposed model for a Domestic Abuse Commissioner outlined above?**

Strongly disagree

**Please explain your answer.:**

Domestic Violence and Abuse is a gendered phenomenon that affects men and women differently - both in terms of prevalence and type. It is inconceivable that a single individual will be able to bridge the chasm between supporting services for female victims while also doing so for male victims.

We propose a model that supports the calls by Women's Aid and others for the Commissioner to be titled the Violence against Women & Girls Commissioner.

This would enable the post holder to focus exclusively on the issue of tackling abuse where the victim is female.

To ensure balance and to comply with the requirements of equalities legislation a separate post titled Deputy Commissioner for Intimate Personal Violence against Men must be established.

**60 Of the proposed powers and resources, which do you consider to be the most important for a Domestic Abuse Commissioner? Please choose up to 3.**

Map and monitor provision of domestic abuse services against the National Statement of Expectations, and publish this information to showcase and share best practice, as well as to highlight where local provision falls short of what is expected, Provide recommendations to both national and local Government to improve the response to domestic abuse, accompanied with a duty on the responsible person/organisation to respond to these recommendations, Publish findings in reports, which will be laid before Parliament

If you answered other please state other functions the commissioner should fulfil.:

**61 What would be the practical implications of complying with the proposed Domestic Abuse Commissioner's powers?**

Please give your answer below:

## Learning from Domestic Homicide Reviews

**62 One proposal is that the Domestic Abuse Commissioner could routinely collate, quality assure and share lessons learnt from DHRs. What more could be done to increase awareness of the learning from DHRs?**

Please give your answer below:

**63 How can areas best hold their own local agencies to account in terms of monitoring delivery against DHR action plans?**

Please give your answer below:

## Sharing best practice across government

**64 How can the government better share and promote effective practice on domestic abuse across all public services both in regard to commissioning and delivery of services?**

Please give your answer below:

A separate pathway and strategy for male victims of abuse- appropriately funded by central and local Government - must be established.

Male victims who took part in our recent survey overwhelmingly reported that they had little or no confidence that their experience was recognised by statutory and third sector services.

The imbalance in resourcing for advocacy (both individual and institutional) between men and women is a disgrace. Men are being marginalised, ignored or victimised by existing services - including the police - and then told that the only support available to them comes from feminist organisations.

Services for men must be ring-fenced and funded appropriately based on need. Feminist organisations cannot credibly provide support to women as well as to men because of the fundamental dynamic of the overwhelming majority of domestic violence relationships.

**65 What role should local areas play in sharing good practice?**

**Please give your answer below:**

Cardiff and the Vale of Glamorgan have decided that services for male victims of abuse will be commissioned separately from those for women. We applaud their thinking in this area - despite the fact that they acknowledge that the driver has been discussion with female victims / survivors who do not want their services also supporting men. This example of local best practice needs to be rolled out across the rest of the UK