



## Joint Principles for the VAWG Strategy 2021-2024

*This document can be used in a number of ways. Your organisation may submit the document as your response to the government's call for evidence on the VAWG strategy. Equally, you may use parts of the documents to bolster your own response or reference this document in addition to your response. It is our aim that we offer a collective and collaborative response to the government's call for evidence on the next VAWG strategy, that is based on the reality of 'by and for' frontline organisations and inclusive of all women's and girls' experiences. This document serves as an opportunity to call for a coordinated gendered response, bringing the sector together behind the key principles highlighted here.*

### Introduction

Government has called for evidence to the Violence against Women and Girls (VAWG) Strategy 2021 to 2024. The specialist 'by and for' VAWG sector, defined on page four, have set out a vision for a VAWG strategy which addresses some of the key concerns we have with the government's approach – including the decision to de-link domestic abuse from other forms of VAWG. 'Dual strategies' will fragment coordinated action to tackle VAWG directly impacting all women and girls, whose needs are multiple and intersecting. In these principles,

we aim to refocus the response on a comprehensive, inclusive and holistic approach to addressing VAWG for all women and girls who are subjected to this oppression and for cohesive support that is strategically aligned to the ‘by and for’ sector.

The dual strategy approach will not only lead to a disjointed response but will also pave the way to gender neutrality in addressing VAWG. CEDAW General Recommendation 35 makes it clear that policy and legal frameworks must be based on the implicit understanding of violence against women as gendered and that this understanding, that is expressed in defining the problem, is evident in government policy and any framework protecting the rights of women. All forms of violence against women are defined as discrimination – explicitly linking gender-based violence to wider forms of discrimination experienced by women and gender inequality.

We also consider the [Anti-Racism Charter](#) and the human rights framework as critical to our call for a VAWG Strategy as both are embedded in fundamental rights and protections for all women and girls. The Anti-Racism Charter in particular is a long-awaited document that specifically addresses structural inequality and racial discrimination through transformative reforms in our sector. Key actions in the charter are based on the implementation of a comprehensive VAWG strategy.

These principles and recommendations are based on long-standing calls from the VAWG sector to Government. Finally, this document could not have been possible without Imkaan’s [Alternative Bill](#), drafted in 2018, following the publication of the Domestic Abuse Bill. The Alternative Bill was embedded in the need for a deep understanding of the lived experiences of all women and girls subjected to VAWG calling for a transformation in response from government encompassing equality and human rights-based approach as consistent with

international and regional conventions and the laws of this country. The Alternative Bill is a foundational document and key reference for these principles, which are based on the original call for action towards a comprehensive response to VAWG.

1. Definition of VAWG
2. Rights and access
3. Prevention
4. Specialist 'by and for' service provision
5. Funding and commissioning
6. Partnerships
7. Multi-agency working
8. Responding to perpetrators

## **1. Definition of Violence against Women and Girls**

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

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

Article 3 of the Istanbul Convention states that violence against women is understood as a violation of human rights and a form of discrimination against women. In this context, the convention establishes that all acts of gender-based violence must be addressed whether occurring in public or private life

for example, sexual harassment occurring across sectors and industries and in public and private spaces is viewed as a violation and a form of discrimination.

The Istanbul Convention identifies that all forms of violence against women must be condemned by states. This means that in defining VAWG, the definition recognises all forms of violence within the definition – experienced by women and girls under 18. This includes domestic violence – all acts of physical, sexual psychological or economic violence occurring in the family, domestic unit or between current or former spouses or partners. The definitions within the Istanbul Convention allows for a standardisation of understandings of VAWG across UK nations, which supports alignment across devolved and non-devolved agencies – which is particularly important for funding, commissioning and multi-agency working.

Consistent and comparable data collection on VAWG, however, remains poor across governments and public sector agencies – resulting in a distorted picture of the scale of male violence and undermining an evidence-based understanding of VAWG.

In the many decades of addressing VAWG in the UK, the specialist ‘by and for’ sector has developed approaches underpinned by intersectionality which provide a useful framework to define and address VAWG. Intersectionality suggests that all ways in which women mark their identity and define their experience of oppression are valid and reflective of the conditions they live, in other words, their lived experience, and that there is no hierarchy of oppression. A response that is intersectional suggests all experiences must be addressed comprehensively, holistically and through women-centred, trauma-informed, needs-led wrap around support recognising

women as whole, and not fragmented, human beings with full enjoyment of human rights.

We recommend the new VAWG strategy:

- Upholds the established international and human rights-based definitions of VAWG, and delivers a comprehensive and integrated approach to tackling all forms of VAWG – including, and not separating, domestic abuse;
- Delivers the ratification of the Istanbul Convention, and ensures this gold standard framework for addressing violence against women underpins the entire strategy;
- Embeds the specialist ‘by and for’ sector’s understanding of intersectionality to meet the needs of all women and girls, and the intersecting forms of oppression which they face; and
- Ensures the collection of comprehensive, comparable and disaggregated data on VAWG across government – at a minimum data must always be collected on the protected characteristics<sup>1</sup> and immigration status for both victim and perpetrator and their relationship.

## **2. Rights and access**

VAWG violates the human rights of women and girls, and bars equal access to rights and freedoms.<sup>1</sup> A coordinated strategy to end VAWG must be grounded in the UK’s commitment to human rights, and obligations to take positive action to prevent

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<sup>1</sup> Including socio-economic status as set out in section one of the Equality Act (2010), but which has yet to be brought forward

and protect women from violence. Delivering equal access to rights and entitlements for all women and girls must be a fundamental principle within the VAWG Strategy.

As is widely understood, treating people equally does not, however, mean treating them the same. Experiences of violence and abuse – and access to support, safety and justice – are different for different groups of women. Their experiences will differ according to the factors which define their participation in society including background, work and access to resources among others. Whilst all women are affected by patriarchy, inequality and discrimination, some women will be affected disproportionately due to their race, ethnicity, sexuality, gender identity, disability, age, class, immigration status, caste, nationality, indigeneity, linguistic minority, and faith.<sup>ii</sup> Consequently, in order to achieve equal access to protection and support, the response needed must reflect the different experiences and needs of women and girls.

Major reform is currently needed to tackle the barriers to equal treatment and access that women and girls currently face. Centring the principle of getting it right for Black and minoritised and marginalised women, ensures that we will get it right for all women. Looking at the journeys of women who have experienced VAWG and experience oppression as a result of their race, ethnicity, socio-economic status, sexuality, and other identities, we know that far too often they will:

- Face discrimination when approaching statutory services, as their identities can place them in the category of ‘other’ which can result in systemic and perpetual exclusion;
- Receive inadequate provision from statutory services, are unable to engage with services which aren’t designed to meet their needs, or be turned

away from services feeling judged, discriminated against and disbelieved;

- Face greater fears that if they report VAWG to statutory services their children will be taken from them, or they may face deportation, detention and other ‘policing’ and surveillance controls; and that;

These institutional biases and structural inequalities increase conditions of the vulnerability they face, and they are likely to face repeat victimisation, further violence and abuse, and trauma.

We also know that the majority of women in prison are survivors of domestic abuse and other forms of VAWG. Far from being supported and protected, many of these women have been unfairly criminalised as a result of their experience of VAWG.<sup>iii</sup> Specific steps are needed to deliver equal protection for women that are currently barred from accessing their rights.

We recommend the new VAWG strategy:

- Is designed to centre women and girls who experience sexual violence, forced marriage, so called ‘honour based’ abuse, FGM and other culturally specific forms of abuse,<sup>2</sup> and tackle the systemic barriers facing Black and minoritised women, migrant women, Deaf and disabled women, LGBT+ survivors and women facing multiple forms of disadvantage.
- Leads legal, policy and funding reform to deliver equal protection for all women – including:

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<sup>2</sup> The term culturally specific forms of abuse is presently used to define form of abuse that occur in some communities. It is important that all forms of abuse and violence against women are recognised as rooted in patriarchy and inequality. While specific forms of abuse may be prevalent in some communities, all forms of abuse need to be addressed under a comprehensive approach to ending VAWG. The term culturally specific forms of abuse is being used to ensure a full and robust definition inclusive of all ways in which women and girls are subjected to violence. It is critical when using this term, that violence is not racialised to specific communities.

- reversing the effective decriminalisation of rape and ensuring access to justice for all sexual violence survivors<sup>iv</sup>;
- full inclusion for Deaf and disabled survivors into the VAWG response, which must be fully accessible;
- reforming law and practice to ensure survivors of VAWG are not unjustly criminalised, but instead receive equal access to support and protection; and
- ensuring migrant women can access the support, welfare systems and legal tools they need to escape abuse, and can report violence without fear of immigration enforcement<sup>v</sup>.

### 3. Prevention

Violence against women and girls is not inevitable, yet it is still one of the most pervasive human rights violations in the UK. We must be able to respond to VAWG when it happens, but we know that we cannot eradicate VAWG without preventing it from happening in the first place by tackling the structures, institutions and attitudes which continue to perpetuate and enable VAWG. Without due attention to gender inequality, discrimination, harmful gender norms and attitudes - and the cultures they promote - the root causes and harmful consequences of VAWG cannot be properly addressed.

The specialist 'by and for' VAWG sector must be central to prevention and early intervention. Some of the most effective solutions are community-based specialist women's organisations, which are already embedded in local spaces building awareness and delivering innovative preventative work. Recognition, signposting to, resourcing and capacity building of 'by and for' Black, minoritised and marginalised women's organisations in particular is vital, as they are

uniquely trusted and able to reach Black and minoritised women and girls.

Key to prevention is ensuring that specialist support is available for all survivors of abuse the very first time they reach out for help. As mentioned throughout this document, the VAWG Strategy must commit to ensuring specialist support services are available and accessible for every woman and girl who seeks them at the point of need, rather than the current postcode lottery to prevent reoccurring violence and abuse and resulting costs to survivors and society.

Beyond the compulsory rollout of Relationships and Sex Education (which must not be delayed any longer), the full implementation of a ‘Whole School Approach’<sup>vi</sup> must be prioritised. This approach should be based in human rights principles and focused on VAWG – this will ensure it addresses inequality and power and is implemented with a view to shifting attitudes and cultures of tolerance, normalisation and acceptance of VAWG as part of women and girls’ everyday lives.

We recommend the new VAWG strategy:

- Embeds prevention and early intervention as an integral part of the response to VAWG throughout the strategy and its delivery, challenging myths and stereotypes across society with accessible and effective communication campaigns and community responses that challenge perpetrator behaviour, and delivering critical change across all systems including schools, communities, health, welfare, social services as well as the criminal justice system (CJS);
- Ensures universal and accessible delivery of a ‘whole school approach’ across educational settings, which is

supported by access to specialist support services for children and young people impacted by VAWG whilst also resourcing ongoing comprehensive evidence-based prevention programming in higher education settings that reaches every university student in the UK;

- Addresses poor probation arrangements that are leaving the most vulnerable children at risk of new and repeat offending by reviewing whether the sex offender register is fit for purpose;
- Ensures there is monitoring of the prevalence and nature of sexual harassment, including racialised forms of sexual harassment to which Black and minoritised women are subjected. and a statutory Code of Practice for employers to prevent and respond to sexual harassment and victimisation at work;
- Ensure that women in the precarious job sector who are often subjected to sexual harassment and sexual violence the workplace are protected by ensuring right sin the workplace and ending zero hours contracts;
- Equips all relevant government departments and statutory agencies to deliver an approach to preventing VAWG which addresses the experiences of all women – delivering reforms across government which will tackle gender inequality (such as equal pay and shared parental leave), paying close attention to intersecting inequalities and recognising that gender inequality cannot be separated out from other forms of inequality; and
- Recognise the integral role of, and ensures that this work is not done without, specialist ‘by and for’ ending VAWG services who need to be sustainably funded for their prevention and community work.

## **4. Specialist ‘by and for’ service provision**

The sustainable and equitable provision of specialist ‘by and for’ VAWG services is essential in the response. These are organisations whose purpose it is to support survivors and/or children and young people affected by any form of VAWG, or to respond to perpetrators.

These services are unique and different from general support services that may provide support or interventions for survivors or perpetrators of not only VAWG, but other crimes as well.<sup>vii</sup> They are independent of the state, delivered ‘by and for’ the users and communities they aim to serve, by organisations whose primary purpose is to tackle VAWG, and provided by expert staff with an in-depth knowledge of VAWG.<sup>viii</sup> The following are core of the work of specialist ‘by and for’ VAWG services: responding to the needs and experiences of individual survivors; delivering gender-specific services and work with a gendered understanding of VAWG; upholding rights; providing holistic support that meets survivors’ needs from safety, to their children, health, housing, finances and justice; and providing unique empowerment. They believe and listen to survivors, and respect their voices within service delivery. Specialist services led ‘by and for’ Black and minoritised women, Deaf and disabled women, LGBT+ survivors and other groups are trusted by the survivors and communities they support due to their long-established reputations, their understanding of multiple forms of discrimination, their linguistic and cultural accessibility, and their intersectional practice.

Specialist ‘by and for’ VAWG services are perennially at risk within the funding landscape, undercut by general support services who can compete on cost but not on meeting survivors’ needs.

We recommend the next VAWG strategy:

- Clarifies the legal responsibilities of the government and public bodies to sustainably fund specialist support services, including for women and children, under Article 22 of the Istanbul Convention; and
- Delivers a robust system of national accountability, based on established quality standards<sup>ix</sup> within the VAWG sector, to ensure survivors of all forms of VAWG can access the specialist support services they need – including services led ‘by and for’ survivors with additional protected characteristics.

## **5. Funding and Commissioning**

The specialist ‘by and for’ VAWG sector continues to face a funding crisis, resulting in women turned away daily at the point of need. The COVID-19 pandemic will have lasting impacts on the VAWG sector as women experiencing violence and abuse reach out for help well into the years to come. VAWG has enormous costs to society and to the state, and strategic investment is urgently required to ensure the full range of specialist support services that women and girls need are available, accessible and sustainable.

The Equality Act 2010 places a duty on local authorities to make decisions of a strategic nature about how to exercise its functions to reduce inequalities - requiring local authorities to ensure appropriate and accessible provision of services addressing the needs of those falling within the protected characteristics of the Equality Act 2010. Both the Istanbul Convention and the Human Rights Act 1998 include an understanding that specific forms of VAWG and discrimination faced by women must be addressed through specialist and

dedicated provision. The Istanbul Convention requires states to deliver, in an adequate geographical distribution, the full range of immediate, short- and long-term specialist and accessible support services for all women and children experiencing VAWG – including refuge services, helplines, rape crisis centres, therapeutic support, advocacy work, other intensive individualised and group support in women-only safe spaces, and work with perpetrators.

However, the current short-term and competitive funding model for specialist support provision is not working and pits services against each other. Tendering is a competitive process, however the ‘by and for’ expert sector are part of the social economy of provision and do not compete on equal footing in an open ‘market’. Such competition results in commissioners and funders gambling with the lives of women and girls – changing providers in order to cut costs, disrupting life-saving services and losing the vital expertise and experience of specialist services in supporting survivors. Society must not continue down this road. Without urgent action to reform the funding landscape for these specialist services, the government will not be compliant with Article 22 of the Convention.

We recommend that the new VAWG strategy:

- Is delivered alongside a secure, national multi-year funding settlement for the specialist VAWG sector, which ensures all forms of service provision for survivors, children and young people and perpetrators are resilient for the future, provides equity of provision for survivors across the UK nations<sup>3</sup>, and is delivered by all government departments responsible for VAWG – including ring-fenced funding for specialist services

<sup>3</sup> An equivalent level of investment must be included in the budget allocation for devolved governments to maintain equity of potential provision for survivors. It is also essential that non-devolved commissioners align with joint commissioning structures in Wales to ensure the efficient use of funding and that specialist services in Wales are not further burdened with dual commissioning and reporting processes:<https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/State-of-the-sector-2020-PDFdesign.pdf>

led 'by and for' Black and minoritised women, Deaf and disabled women and LGBT+ survivors;

- Guarantees that local funding and commissioning processes adhere fully to the Equality Act and the Public Sector Equality Duty contained therein, and are led by partnerships, which reflect and represent the populations they serve – requiring the full inclusion of specialist 'by and for' VAWG sector in commissioning processes and outcomes;
- Systematically reforms the current competitive funding and commissioning landscape to ensure the specialist 'by and for' VAWG sector can fairly access funding - this requires
  - returning to long-term grant funding for VAWG provision,
  - ending competitive tendering where it is not required,
  - ensuring all funding and commissioning processes for VAWG recognise and value specialist support provision as required under the Istanbul Convention,
  - adopting established quality standards in the VAWG sector as the basis for funding<sup>x</sup>, and
  - delivering core funding to organisations so that services genuinely access full cost recovery; and
- Ensures that all public funding for VAWG support promotes women-centred, trauma-informed, needs-led, holistic, accessible and wrap-around support services, as the sustainable way of addressing intersecting need and preventing further repeat victimisation and exposure to further risk. This requires moving away from a focus on funding through criminal justice outcomes, valuing women's healing and recovery more holistically and comprehensively, and ensuring women have a voice in the support they can access.

## **6. Partnerships**

Working to end violence against women and girls requires investment of resources across the public and the specialist 'by

and for' VAWG sectors, as well as sustainable and robust partnerships with police, housing, the health service, the Department for Work and Pensions including Job Centre Plus, the Crown Prosecution Services, the CJS, children's services, social services and commissioners, among others making up statutory services. Such partnerships should be the foundation of local ending-VAWG plans, strategies and practices and must be backed by adequate resourcing for the specialist 'by and for' VAWG sector to ensure their meaningful involvement.

The specialist 'by and for' VAWG sector is essential to ensure a gendered infrastructure, inclusive of strategy, planning, policy and practice, towards ending VAWG. This category also addresses structural inequality as a sector that is led by women, is a crucial part of the gendered economy addressing women's unequal participation and protecting women's economic and social contribution. As such, by addressing structural inequality in this way, inclusive partnerships will address the feminisation of poverty and related inequality in health, housing, education, media, business, entertainment industry and other areas where women and girls seek fulfilment and enjoyment without the threat to their livelihoods.

We recommend that the next VAWG strategy:

- Clearly defines the specialist 'by and for' VAWG sector as expert providers and critical strategic partners whose participation is essential for effective local, regional and national VAWG partnerships;
- Ensures the Public Sector Equality Duty and equality impact assessments are routinely used by local authorities and other statutory agencies to ensure that women are treated equally in all decision-making processes that affect them; and

- Ensures funding structures are designed around a comprehensive approach to addressing VAWG which means long-term sustainability enabling organisations to plan and deliver appropriate and accessible provision.

## **7. Multi-agency responses**

Women's lives cannot be fragmented, and neither can society's response to the violence they experience. Multi-agency partnership working needs to be prioritised if we are to see the whole picture of a survivors' situation and ensure they receive the most effective safety and support planning from agencies.

Multi-agency structures, however, currently struggle to cope with excessive caseloads and manage demand through poor risk assessment and other practices, for example 'screening' and 'filtering' cases, which are means of gatekeeping survivors' access to the support they need. Currently, multi-agency responses too often fail to keep survivors safe, meet the needs of women and children, and respond to their experiences of coercion and control – resulting in repeat victimisation, rather than early intervention which prevents further harm. Multi-agency working is currently also almost non-existent for survivors of sexual violence.

A Coordinated Community Response (CCR)<sup>xi</sup> that brings together services, including health, housing, social care, education, criminal justice and communities, to ensure local systems keep survivors safe, hold abusers to account, and prevent VAWG is needed. In order to do this, shared responsibility across agencies, good governance and strong coordination is vital. This response needs to be locally developed and locally owned in order to appropriately reflect

and meet nuanced local practices, challenges and opportunities. An intersectional approach, that centres the survivor's voice and experience, is paramount and can only be achieved through the full and equal representation of specialist support services in multi-agency responses.

We recommend that the new VAWG Strategy:

- Is underpinned by adequate funding for all public sector agencies who respond to VAWG to ensure that they have the capacity to respond effectively, and training delivered by specialist 'by and for' VAWG services to ensure professionals provide the right response to survivors;
- Incentivises and encourages local areas to work together to respond to the changing nature of all forms of VAWG in their area - recognising the diversity of survivor experiences, understand their local population and the specific needs of their communities, so that they are adequately meeting the needs of, in particular, minoritised and marginalised survivors; and
- Expects Coordinated Community Responses to not just deliver a crisis response to VAWG, but work to identify abuse early on and prevent it from happening in the first place. Responses must be informed by survivors, data and evidence-based driven, intersectional and mindful of the multiple barriers and discrimination faced by different survivors.

## **8. Responding to perpetrators**

The VAWG Strategy must focus on reducing the harms caused by perpetrators and managing any ongoing risks they pose. This must go alongside action to prevent violence in the

first place (see above, section 3 on prevention). The response must change from one that places the responsibility for survivors to manage their experiences of violence and abuse, to one which holds perpetrators accountable. It is estimated that only 1% of perpetrators of abuse get any kind of intervention to address their behaviour, and perpetrators continue to receive interventions that are neither quality assured nor safe.<sup>xii</sup>

A very small proportion of perpetrators are currently in the CJS, and those who are, are often insufficiently held to account and important opportunities for their rehabilitation and risk management through probation are frequently missed.<sup>xiii</sup> Significant reform is required to ensure that the CJS brings perpetrators to justice and this must continue to be a core focus for the VAWG Strategy. In addition, other agencies outside the CJS need to vastly improve their identification and responses to perpetrators. Over 125 organisations from across statutory, voluntary and academic sectors have come together to articulate a vision of what a more strategic response to DA perpetrators would look like in a '[call to action](#)'. However further work is needed on developing responses across the whole VAWG spectrum. Further work is additionally needed to develop quality interventions across all forms of VAWG, and ensure that victims of perpetrators from minoritised groups are not excluded from the benefits of effective perpetrator work.

We recommend that the next VAWG strategy:

- Ensures that quality assured perpetrator interventions are consistently available – addressing risks from primary prevention (like bystander responses and awareness raising communication campaigns) to

- behaviour change group work, to specialist responses for the most dangerous and serial perpetrators;
- Reviews the effectiveness of sexual harm prevention orders given that criminal justice neither sanctions nor deters the vast majority of offenders;
  - Connects sexual violence and domestic abuse offences to any new online harms strategy where a large amount of connected 'online offending' take place and where new forms of abuse are rapidly emerging and expanding;
  - Establishes a quality assurance system for perpetrator work, which ensures that interventions funded by public sector agencies are always accredited<sup>4</sup>, designed to keep survivors and their children safe, and delivered alongside support provided by specialist VAWG organisations; and
  - Delivers effective leadership and multi-agency arrangements ensuring all government departments and public services are actively holding perpetrators accountable, that professionals are trained to identify and respond to perpetrators, and there are clear pathways into safe and effective perpetrator interventions.

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<sup>4</sup> Respect has published standards which government has endorsed, but there is no requirement for commissioners to follow these or any other standards in England.

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<sup>i</sup> United Nations Declaration on the Elimination of Violence against Women, 1993

<sup>ii</sup> Imkaan, Alternative Bill, 2018

<sup>iii</sup> Centre for Women's Justice, Submission 2 – Criminalisation of survivors, Draft Statutory Guidance Framework: Domestic Abuse Bill,

<sup>iv</sup> Rape Crisis England and Wales, End Violence Against Women Coalition, Imkaan and Centre for Women's Justice, *The Decriminalisation of Rape: Why the Justice System is Failing Rape Survivors and What Needs to Change*, 2020.

<sup>v</sup> This is not an exclusive list of the reforms required to protect and support all women experiencing VAWG, and as we learn more about VAWG we understand more about the inequalities and barriers which bar women from safety, support and justice.

<sup>vi</sup> AVA: <https://avaproject.org.uk/ava-services-2/children-young-people/whole-schools-approach/>

<sup>vii</sup> Explanatory Report to the Council of Europe Convention on preventing and combating violence against women and domestic violence Istanbul, 11.V.2011

<sup>viii</sup> There is currently no UK government definition of 'specialist' VAWG services, but the principles set out here have been adapted and drawn from established knowledge and practice approaches identified by Imkaan and its network of members: *Imkaan, Imkaan accredited quality standards: addressing violence against black and minority ethnic women and girls*, 2015. These principles have also been adapted into a definition of 'specialist' developed by Welsh Women's Aid and recently adopted by the Welsh government in commissioning guidance: *Welsh Government, Statutory Guidance for the Commissioning of VAWDASV Services in Wales*, 2019.

<sup>ix</sup> For example, the Violence Against Women and Girls Sector Shared Core Standards developed by Imkaan, Rape Crisis England & Wales, Respect, SafeLives and Women's Aid Federation of England.

<sup>x</sup> For example, the Violence Against Women and Girls Sector Shared Core Standards developed by Imkaan, Rape Crisis England & Wales, Respect, SafeLives and Women's Aid Federation of England

<sup>xi</sup> Standing Together, In Search of Excellence Executive Summary, 2020

<sup>xii</sup> Drive Project, Call to Action for a Domestic Abuse Perpetrator Strategy, 2019.

<sup>xiii</sup> <https://www.justiceinspectorates.gov.uk/hmiprobation/wp-content/uploads/sites/5/2018/09/Report-Domestic-Abuse-the-work-undertaken-by-CRCs.pdf>