

LGA's response to the Government's consultation on the Domestic Abuse Bill

31 May 2018



About the Local Government Association (LGA)

1. The Local Government Association (LGA) is the national voice of local government. We work with councils to support, promote and improve local government.
2. We are a politically-led, cross party organisation which works on behalf of councils to ensure local government has a strong, credible voice with national government. We aim to influence and set the political agenda on the issues that matter to councils so they are able to deliver local solutions to national problems.

Key messages

3. Domestic abuse is a horrendous crime, which can have a long-term and devastating impact on families, particularly children. It can take the form of psychological, physical, sexual, emotional or economic abuse, and occur in a wide range of domestic settings.
4. The new Domestic Abuse Bill has the potential to make important changes to help improve the lives of victims of domestic abuse. Our ultimate aim should be preventing domestic abuse from occurring in the first place. We are supportive of the early intervention and preventative approach set out in this consultation, both for the victims and perpetrators, to ensure they receive the right support at the right time. It is imperative the Government recognises a more co-ordinated, public health style approach is needed to challenge attitudes towards domestic abuse and reduce its prevalence.
5. Our recent work with the Independent Anti-Slavery Commissioner on the role of councils in tackling modern slavery has been a good example of how we can collaborate on this type of issue. We hope to replicate this with the new Domestic Abuse Commissioner. Councils are already working towards achieving the objectives set out in the National Statement of Expectations (NSE). We hope to make further progress on this work with the Commissioner to ensure local services are victim-centred, strategically commissioned, and include a focus on safeguarding individuals, managing perpetrators and local awareness-raising.
6. Successfully addressing domestic abuse requires a multi-agency public health approach to supporting victims of domestic abuse. Police and crime

Briefing

commissioners have a clear role to play given their statutory responsibilities for victims, but councils and other public services have an important role to play alongside the police. Health, housing and education services are vital to tackling domestic abuse. Rather than focus on processes and structures, central government and local partners need to focus collectively on strengthening the culture of local collaboration and joint commissioning. Encouraging this shift in culture across the health service is especially important.

7. A key element going forward in any multi-agency response should be a shift towards disrupting the life of the perpetrator, rather than the victim. In order to achieve this, we need to develop accessible, effective interventions that are designed to reduce the number of perpetrators now and in the future. Where possible victims of domestic abuse should be supported to remain in their own home, but only if it is safe to do so. There needs to be clarity on the powers that are available to councils when looking at housing, support and treatment options for alleged perpetrators.
8. Reducing domestic abuse over the longer term also means looking at what younger people are taught about relationships. This must include what children and young people are watching online and the impact this is having on their views about appropriate behaviour in a relationship.
9. Any legislative changes in the Bill need to be matched with adequate resources and funding. Local government is facing unprecedented levels of demand, with an overall funding gap that will exceed £5 billion by 2020. This means councils are increasingly being forced to prioritise spending for those at immediate risk of harm, rather than on earlier support services that can help families address harmful behaviours, including in areas such as domestic abuse.
10. We will continue to work with the Government and our local government partners on this important issue, as the consultation progresses.

Detailed Response

11. We have set out responses below to some of the general questions raised by the consultation, where the LGA has a specific view. We have not responded to questions regarding local implementation of policies or processes by individual councils, or to some questions where we do not have a firm view.

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

12. We welcome the introduction of a new statutory definition of domestic abuse as part of the Domestic Abuse Bill. This should help to ensure there is greater consistency and understanding of this important issue across all agencies and partners. It is right the definition recognises domestic abuse can happen to any victim, in all relationships, whether it is perpetrated by an intimate partner or in wider familial settings. It is also important the definition acknowledges that domestic abuse can include both single incidents and patterns of behaviour.
13. Both Scotland and Wales have recently undertaken legislative changes on domestic abuse. For example, the Domestic Abuse (Scotland) Act 2018 creates

an offence with respect to the “engaging by a person in a course of behaviour which is abusive of the person’s partner or ex-partner; and to make rules of criminal procedure for that offence and also for offences subject to the statutory aggravation involving abuse of partners or ex-partners.”¹ It will be important for the UK Government to take these legislative changes in the devolved regions into account and assess whether the new statutory definitions have helped to improve the response to domestic abuse in Scotland and Wales.

14. We would recommend the Government consults with the College of Policing to ensure the new statutory definition of domestic abuse will be understood by police forces and the new offences associated with this definition will be enforceable. It is particularly important that training on the new definition of domestic abuse is made available for police officers. The Government should also consider what changes will need to be made to the current data collection practices to account for the new statutory definition. Given the high volume of Multi Agency Risk Assessment Conferences (MARACs) we are currently experiencing, it will be imperative that local authorities, police and wider partners have the necessary support and investment to respond to an increase in domestic abuse cases, as a result of this new legislation.
15. The inclusion of economic abuse rather than simply financial abuse is a significant change to make to the definition and one we are supportive of. A recent Women’s Aid report on domestic abuse states that “it is often very difficult for victims to recognise abuse which is of an economic or financial nature: it may develop slowly and insidiously, so that what at the outset could be seen perhaps as protectiveness can become increasingly controlling, and leave no outlet for an independent life of any kind”.² It is clear that economic abuse can act as a barrier for victims of domestic abuse for example, when accessing support services or leaving an abusive relationship. So it is crucial this is recognised by all agencies.
16. We should also examine how the Government, local agencies and organisations could inadvertently facilitate economic and financial abuse. For example, the House of Commons Work and Pensions Select Committee inquiry is considering the effect of Universal Credit changes on victims of domestic abuse. It is encouraging to hear the Government has produced guidance on domestic abuse, in relation to split payments of Universal Credit, to ensure work coaches and case workers can refer victims of domestic abuse to external, expert support. It is vitally important that the new statutory definition of domestic abuse is understood by all partners, across different policy areas and departments.
17. There should also be a greater understanding of economic and financial abuse in the financial services industry. The “My Money, My Life” campaign launched by Refuge and the Co-operative Bank in 2015 which called for industry-wide

¹ Domestic Abuse (Scotland) Act 2018

<http://www.legislation.gov.uk/asp/2018/5/introduction/enacted>

² Women’s Aid report: Domestic abuse and financial abuse – an overview, 2012

https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2016/05/DAME_CHAPTER_02.pdf

agreement to support people who experience financial abuse in their relationships is a good example of this.³

18. The Government's consultation also proposes that the new statutory definition will be accompanied by underpinning statutory guidance for professionals who have safeguarding obligations. We agree it would be helpful to have additional detail on the various circumstances in which domestic abuse can occur, for example child to parent abuse or domestic abuse in LGBTQ+ relationships. When the Government's definition of domestic abuse was widened in 2012 to include those aged 16-17 and the wording changed to reflect coercive control, the Home Office published information for local areas on the change to the definition of domestic violence and abuse.⁴ The guidance provided useful information for practitioners on young people using violence and abuse in close relationships and other circumstances of domestic abuse. We would be welcome additional guidance on the new statutory definition of domestic abuse.
19. Whilst addressing domestic abuse in younger relationships is referred to in the consultation, we would also like to highlight the importance of recognising domestic abuse in older generations. The Safe Lives spotlight series on older people and domestic abuse found that victims aged 61 or more are much more likely to experience abuse from an adult family member or current intimate partner than those 60 and under.⁵ We need to ensure that domestic abuse is fully considered by frontline practitioners, through the implementation of training to ensure practitioners are recognising the dynamics of abuse between intimate partners or from family members. We would recommend the data collected on domestic abuse extends to victims who are aged 60 and over, in order to provide a more accurate representation of the issue.
20. Domestic abuse can affect people from all ethnic groups and communities. The form of abuse may vary, for example in some communities the domestic abuse may be perpetrated by extended family members, or it may include forced marriage, or female genital mutilation (FGM). The ethnicity of the perpetrator and cultural issues should not be a mitigating factor for the perpetrator, but ethnic and cultural issues are likely to be important issues in providing the right support for the victim. This should be recognised in the accompanying guidance.
21. The new statutory definition of domestic abuse needs to be more than a legislative change. There needs to be a cultural change in how domestic abuse is understood, recognised, responded to, and ultimately prevented. For example, the new coercive or controlling behaviour offence became a criminal offence as part of the Serious Crime Act 2015. In the year ending 2016, there

³ Refuge and Co-Op Bank report, Money Matters, 2015: <https://www.co-operativebank.co.uk/assets/pdf/bank/aboutus/ethicalpolicy/financialabuse/moneymattersreport.pdf>

⁴ Information for Local Areas on the change to the Definition of Domestic Violence and Abuse, Home Office, 2013: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/142701/guide-on-definition-of-dv.pdf

⁵ Safe Lives Spot Light report, Older People and Domestic Abuse, October 2016 <http://www.safelives.org.uk/spotlight-1-older-people-and-domestic-abuse>

were 59 offenders convicted of coercive and controlling behaviour and 58 offenders were sentenced for this offence.⁶ This legislative change was influential but in order to be effective, it also required the understanding and effective response of the police force, the criminal justice system, the legal system, local partners and organisations and the wider public's understanding to being able to recognise coercive or controlling behaviour as a criminal offence.

22. The new statutory definition of domestic abuse is an essential step towards making sure there is a greater understanding of this issue to help ensure victims, communities and professionals are better able to confront and challenge it.

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

23. Training and guidance for frontline professionals needs to be relevant to the roles people are doing and realistic about the resources available. We would expect the new Domestic Abuse Commissioner to play a key role in ensuring the new statutory definition is embedded in frontline practice and the necessary guidance and training, with adequate resources, is provided to frontline professionals.
24. In recent years, we have seen changes in the police's response and increased accountability through Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) report on domestic abuse. The report has helped to drive forward improvements in police practice through inspecting the police's response to domestic abuse and making recommendations for changes in practice. This will continue to help embed best practice in organisations and with frontline professionals.
25. In local government, we have seen the success of the 'making every contact count (MECC)' model. This means that councils and their local partners use their day-to-day interactions with the public to signpost people to relevant support or advice services and encourage changes in behaviour that have a positive effect on the health and wellbeing of individuals, communities and populations. For example, to help someone stop smoking or reduce their alcohol consumption, to reduce their risk of poor health.
26. Ellen Pence's work on the Blueprint for Safety is a good international comparison to make, when looking at how to embed frontline practice and prompt a shift in thinking across different agencies on domestic abuse. The Blueprint for Safety draws upon the experience of community members, practitioners, advocates, victims, lawyers, researchers, agency leaders, and experts in confronting domestic abuse both locally and nationally. The policies and protocols are designed to guide every practitioner to do everything possible each time a person reaches out for help. Each frontline professional who is involved in the domestic abuse case is positioned to act in ways that protect

⁶ ONS statistics, Domestic abuse in England and Wales: year ending March 2017: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/domesticabuseinenglandandwales/yearendingmarch2017>

victims from ongoing abuse and hold offenders accountable.⁷ Most importantly, the Blueprint for Safety ensures victims of domestic abuse help to inform the guidance and training of frontline professionals, which means organisations and services will be able to better respond to their needs. If we want to see the system change, then we must listen to those who have experienced domestic abuse and use their expertise to ensure our support services are built around them and their needs.

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

27. We think it is important that younger people are considered in the statutory definition of domestic abuse, particularly given the role that online pornography and social media has played in negatively shaping some young people's understanding of relationships.

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?

28. It is positive that the Domestic Abuse Bill consultation acknowledges that prevention and early intervention should be the foundation of our approach to tackling domestic abuse, particularly in terms of the impact it can have on children. It was encouraging that the Government allocated £8 million towards support for children who witness domestic abuse, following the [LGA's call](#) for an urgent injection of funding into early intervention initiatives that provide support for children experiencing domestic violence. We look forward to receiving further information on how this funding will be made available and details of the bidding process.

29. It is crucial that we focus on the needs and experiences of children and young people. We know that children may experience high levels of anxiety and depression in response to living with domestic abuse, and this could have a harmful impact on educational outcomes and put them at higher risk of offending.⁸ According to the NSPCC, children exposed to domestic violence are also more likely to experience behavioural and emotional problems.⁹ With approximately one in five children having been exposed to domestic abuse, this is an issue which requires urgent attention from the Government.

30. Reducing domestic abuse over the longer term means looking at what younger people are taught about relationships. In our response to the Department of Education's consultation 'Changes to the teaching of Sex and Relationship Education and PSHE', we outlined the LGA's support to make Relationships

⁷ Blueprint for Safety, Ellen Pence's Work: <http://www.bwjp.org/resource-center/resource-results/the-blueprint-for-safety.html>

⁸ JTAI :The multi-agency response to children living with domestic abuse https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/680672/JTAI_domestic_abuse_18_Sept_2017.doc

⁹ <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/>

and Sex Education (RSE) compulsory in all secondary schools.¹⁰ Effective Relationship Education (RE) is essential for children because it gives them a foundation to build upon as they transition from childhood to adolescence and young adulthood. It is therefore vital that RE and RSE is delivered as an integrated part of the framework for PSHE and the National Curriculum.

31. Understandably, schools have an important role to play in helping children and young people learn about positive relationships and educating them about abuse. Teachers see children on a daily basis, so they are in a good position to identify trends in behaviour and take action if needed. Children also learn about the importance of healthy relationships in schools, both as part of the curriculum and in the school environment. Open conversations inside and outside the classroom can help children recognise potentially abusive behaviours, identify trusted adults who they can talk to and offer information about support services.¹¹
32. We know that children and young people who receive comprehensive, high quality RSE are more likely to delay the first time they have sex, have consensual relationships, be aware of and report abuse, use contraception and condoms when they start a sexual relationship and be less likely to be pregnant by 18 or contract a sexually transmitted infection.¹² We welcome a focus on equipping children and young people with the skills and knowledge needed in these areas. We also want to ensure these reforms are coordinated with the Children and Adolescent Mental Health Services (CAMHS) Green Paper proposals, so that the new designated mental health leads can recognise domestic abuse as an issue and refer children and young people appropriately.
33. Given the widespread prevalence of sexting and young people's access to online pornography, opportunities need to be provided to discuss representations of sex and how these are gendered.¹³ Educating children and young people early about the risks associated with digital and social media, including how to spot dangers, staying safe online and how to report abuse must form a part of the curriculum. Relationship Education also needs to help young people to have a realistic view of their appearance and to be critically aware of how the media can present an unreal picture of sexual behaviour and body image. We would like to see this issue addressed as part of the Department for Education's statutory guidance on Relationships Education and Relationships and Sex Education (RSE).

¹⁰ LGA's response to DfE consultation 'Changes to the teaching of Sex and Relationship Education and

PSHE' <https://www.local.gov.uk/sites/default/files/documents/20180212%20LGA%20submission%20DfE%20Changes%20to%20the%20teaching%20of%20SRE%20and%20PSHE%20WEB.pdf>

¹¹ Pearce, J. (2009) Young People and Sexual Exploitation: It's not hidden, you just aren't looking London: Routledge, <https://www.routledge.com/Young-People-and-Sexual-Exploitation-Its-Not-Hidden-You-Just-Arent/Pearce/p/book/9780203874189>

¹² LGA and PHE report on teenage pregnancy and young parents 'Good progress but more to do' <https://www.local.gov.uk/sites/default/files/documents/good-progress-more-do-tee-68d.pdf>

¹³ Key messages from research on child sexual exploitation: Professionals in school settings, March 2017:

<https://www.csacentre.org.uk/index.cfm/?api/render/file/?method=inline&fileID=A4CDD829-75B7-40B7-88FA4B774DD31F2A>

34. Following recent Government strategies, schools are expected to play a key role in tackling an increasing number of issues, for example serious violence, mental health, and wider safeguarding and exploitation issues. If schools are expected to take on these additional responsibilities, then the Government will need to provide adequate support and invest in schools to deliver on these commitments.
35. The majority of young people want to learn about RSE at school, but they also want to be able to talk to their parents and health professionals, such as school nurses, school counsellors, or sexual health services about sex and relationships too. As part of RSE, PSHE and RE classes, children and young people could be signposted to wider services provided by the school, local authority, health services and voluntary sector. Schools can take a whole school approach to the delivery of RSE, RE and PSHE to ensure consistent messaging and co-ordination across all services. Making services young people friendly will help to make children and young people feel confident about using services and will help to reduce stigma.
36. It is vital that support for young people at school is fully co-ordinated with other sources of help and protection, and we remain concerned that the Children and Social Work Act 2017 excludes schools from core partner status in the new multi-agency safeguarding arrangements, which will replace the old Local Safeguarding Children Board structures. We are clear that a failure of schools to engage in local arrangements would create a gap in the system that could fundamentally compromise its effectiveness.
37. Further, we are disappointed that the provisions outlined in the proposed *Working Together* guidance still place the onus on the three core safeguarding partners to attempt to engage schools, rather than placing a clear duty on schools to play their part as full partners in line with the expectations on local authorities, health and the police. It is also unclear how regional school commissioners will be expected to collaborate with the new multi-agency safeguarding arrangements. It is vital that these concerns are addressed if we are to ensure that schools are able to play their part in a fully joined up system of support for children and young people.
38. The Centre of expertise on child sexual abuse (CSA), which has been established to help bring about significant and system-wide change in how child sexual abuse is responded to locally and nationally, has focused on identifying, generating and sharing high quality evidence of what works to prevent and tackle Child Sexual Abuse (including Child Sexual Exploitation (CSE)), to inform both policy and practice. In their guidance for professionals in school settings, the CSA suggests creating an educational environment in which there is a 'whole-school' approach to addressing gender inequality, sexual consent, and relationships built on respect is crucial in responding to violence and abuse, including CSE. The report highlights that the school curriculum, school policies, pastoral support and school ethos all contribute to environments that enable or challenge exploitative practices and the attitudes that condone them.¹⁴ We

¹⁴ Key messages from research on child sexual exploitation: Professionals in school settings, March 2017

would recommend the Government utilises the evidence and findings from the CSA to inform their approach to relationship education in schools.

39. It is also important to highlight the role of youth workers in helping young people understand the value of positive relationships with adult role models. Younger people may be more prepared to learn from and engage with youth workers, rather than statutory workers like teachers or social workers. However, rising demand for child protection services alongside long-term reductions to local government funding have forced local authorities to considerably reduce their youth work offer, directing their increasingly scarce resources towards front-line social work and support for looked after children instead. The LGA has previously called for a portion of the £1.26 billion (2016 - 2020) budget for the National Citizen Service to be devolved to local authorities to support this vital youth work support, which would include dedicated, year round support for young people on the benefits of positive relationships.

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?

40. All frontline professionals should receive the necessary training and guidance on domestic abuse to improve the identification and response to it. There needs to be a whole-systems approach to responding to domestic abuse; no one organisation can be held responsible. All agencies need to have an understanding of the issue, whether its professionals in policing, criminal justice, health, welfare, education or local authorities.
41. We want to see a particular emphasis on supporting children who have witnessed or experience domestic abuse. As the Joint Targeted Area Inspection (JTAI) report has found, GPs, midwives, teachers, nursery staff, health visitors and many more see children on a regular, if not daily basis.¹⁵ If we are to focus more on preventing abuse, and repairing the damage it has done after the fact, multi-agency working and coordination between these frontline professionals is crucial.
42. The LGA recently hosted a training session for local government frontline staff, led by the Domestic Abuse charity Standing Together, which helped provide professionals with best practice on Violence Against Women and Girls commissioning issues. We would be supportive of additional training in this area, if the Government could allocate adequate funding for it.

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

43. The consultation references the JTAI report on the 'Multi-Agency Response to Children Living with Domestic Abuse', which highlights that there has been

https://www.csacentre.org.uk/index.cfm/_api/render/file/?method=inline&fileID=A4CDD829-75B7-40B7-88FA4B774DD31F2A

¹⁵ JTAI :The multi-agency response to children living with domestic abuse

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/680672/JTAI_domestic_abuse_18_Sept_2017.doc

good overall progress made by local areas in responding to domestic abuse.¹⁶ However, the report also identifies a pattern of ‘incident-led’ responses, which are short-term and focused on the immediate incident and not the bigger picture. The report additionally found the focus of services is often primarily on the victim, both in terms of keeping the victim safe and sometimes looking to the victim to manage the abusive situation. We should be looking to prevent the abuse from occurring in the first place and focus our efforts on disrupting the life of the perpetrator rather than the victim.

44. There are a number of recommendations in the JTAI report which could help improve statutory agencies’ understanding of domestic abuse and should be included within the Government’s legislative proposals. There needs to be a public service message aimed at reducing the prevalence of domestic abuse as part of a long-term strategy. The focus of this public service message should be on those perpetrators who have offended or might offend, and to communicate a better understanding of the behaviour and attitudes of those perpetrating abuse. If there isn’t a greater focus on achieving a co-ordinated public health approach to tackling domestic abuse, the Bill will be a missed opportunity.
45. There is limited reliable research or evidence that enables agencies to select and deploy interventions they know are effective in changing the behaviour of perpetrators. The JTAI report found that accessible interventions, at different levels of intensity, that are designed to reduce the number of perpetrators now and in the future are simply not part of the system. There needs to be a focused effort across agencies to develop and test interventions. Once interventions are identified, they need to be made available for all levels of risk and need, particularly at the stage of early intervention. More needs to be done to develop an evidence base that is extensive and rigorous enough to justify investment.
46. There is still not a clear and consistent understanding about what information professionals can share within agencies and across agencies. Given the changes introduced through the General Data Protection Regulations (GDPR), the LGA thinks it is crucial for the Government to issue guidance on how this affects safeguarding and information sharing arrangements, particularly the impact on domestic abuse victims. The Government should also take into consideration the effectiveness of information-sharing arrangements and the quality of data collection across agencies, as this requires improvement.
47. The JTAI report highlights that if we are to focus more on preventing abuse, and repairing the damage it has done after the fact, then multi-agency working and coordination between frontline professionals is crucial. We agree that sophisticated and targeted information sharing processes and policies lie at the heart of this joined-up approach. Whilst training and new guidance can help to improve statutory agencies’ understanding of domestic abuse – there are systemic changes which need to be made to policies, procedures and

¹⁶ JTAI :The multi-agency response to children living with domestic abuse

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/680672/JTAI_domestic_abuse_18_Sept_2017.doc

commissioning. We expect this to be a central part of the new Domestic Abuse Commissioner's role.

48. This consultation comes at a time when local government, and particularly, children's services, are facing unprecedented demand. Councils have worked hard to protect budgets for essential child protection services, but funding pressures have led to difficult decisions elsewhere, leaving children and young people unable to access support until they reach breaking point.

49. As part of our Bright Futures campaign, we are calling on the Government to plug the growing £2 billion funding gap for children's services by 2020 and reverse the cuts to early intervention funding to local councils. Without this funding, councils will find it increasingly difficult to invest in early help services, such as children's centres and family support, that can prevent children entering the social care system, and help to manage needs within families to avoid them escalating.¹⁷

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?

50. Victims of domestic abuse may experience different barriers to disclosing domestic abuse. There needs to be a range of specialist services available to help victims feel they can access guidance, advice and support when needed.

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**
- **Accommodation services**
- **Helpline services for those affected by domestic abuse to call for advice and support**
- **Interventions embedded in health**
- **Perpetrator programmes which aim to change offenders' behaviour and stop reoffending**
- **Rolling out of new multi-agency approaches**
- **Don't know/no answer**
- **Other - please explain**

51. In order for the Domestic Abuse Bill to be successful and implement effective change, the Government needs to provide requisite funding and resources for all statutory agencies. Councils are already working towards achieving the objectives set out in the National Statement of Expectations (NSE). The NSE aims to provide a framework for collaborative, robust and effective local provision. The objective is for local services to be victim-centred, strategically

¹⁷ LGA Bright Futures Campaign, Children's Services:

<https://www.local.gov.uk/about/campaigns/bright-futures/bright-futures-childrens-services>

commissioned, and include a focus on safeguarding individuals, managing perpetrators and local awareness-raising.

52. This is a framework which is broadly supported across sectors. Councils have used the NSE as a tool to help inform how they map needs and want partners to work together; changed commissioning processes, so that the focus is on gender-based violence; and, broadened their focus from domestic abuse to include issues such as trafficking.
53. We would recommend the Government allocates funding to the five priority areas of the National Statement of Expectations:
 54. putting the victim at the centre of service provision;
 55. managing perpetrators;
 56. a strategic approach to commissioning;
 57. safeguarding individuals; and
 58. raising awareness.
59. Councils have found that perpetrator programmes which aim to change offenders' behaviour and stop reoffending have often lacked funding or are only commissioned as part of temporary pilot schemes. For example, the JTAI report found significant gaps in the services available for adult perpetrators of domestic abuse and long waiting times to access support services. Gaps were especially acute for those perpetrators who have not received a criminal conviction through the courts. In one case, a perpetrator had been identified as needing to complete a programme to address his abusive behaviour, but this programme had not begun by the time the perpetrator left prison because of long waiting times.¹⁸ There needs to be a long-term investment in perpetrator interventions, to build a comprehensive evidence-base of what works that will help councils identify which programmes to invest in.
60. Investing in housing is central to tackling domestic abuse. We know there is considerable concern amongst our partners about the potential impact of the short-term accommodation grant on funding refuge provision. This is why in our response to the Supported Housing consultation, we have said it is essential that the Government provides adequate ring-fenced funding now and in the future, so that councils and partners can secure short-term housing for all vulnerable people with support needs. It is imperative the measures in the Domestic Abuse Bill take into consideration the Ministry of Housing, Communities and Local Government's review of domestic abuse services in England and subsequent proposals for supported housing. We will continue to work with the Government and our partners on this important issue.
61. It is clear that emergency accommodation is a key part of the provision which can help a victim when they are forced to flee their own home and this option should be available in all local areas. However, we also need to look at the wider support available to victims and how we can shift resources to preventing

¹⁸ JTAI :The multi-agency response to children living with domestic abuse

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/680672/JTAI_domestic_abuse_18_Sept_2017.doc

the abuse from occurring in the first place. Where possible, councils believe the priority should be to try to help a victim of domestic abuse remain in their home if it is safe to do so. We know the Government is also looking to publish guidance on social housing, and as part of that consultation the LGA called for measures which can help councils provide support for someone wishing to stay in their own home. Uprooting a family, especially if there are children involved, could be seen as a double injustice for the victim when they have already suffered abuse in the home. Further clarity on how councils can support victims of domestic abuse to stay in their own home, if it is safe to do so, would be welcome.

62. We are also supportive of the Safe Lives recommendation to increase the number of Independent Domestic Violence Advisers (IDVAs) in all acute hospital settings, particularly Accident and Emergency and maternity departments. The role of the hospital-based IDVA is to provide immediate support and advice to victims of domestic violence within the hospital; to link individuals and families to longer-term community based support; and to provide hospital staff with expert training so that they have the confidence to ask about domestic abuse. Given that domestic abuse costs the NHS £1.73 billion a year, it is imperative that health providers are part of the long-term solution to tackle domestic abuse. The Safe Lives report 'A Cry for Health' found that nine out of ten victims of domestic abuse reported improvements in safety following an intervention by a hospital IDVA. This intervention is particularly important as the report shows 51 per cent of hospital victims, who have experienced domestic abuse, have children in their households.¹⁹ Advocacy plays a crucial role in supporting victims of domestic abuse and in order to be sustainable, it needs the Government to invest in these services.

63. Victims of domestic abuse often reach out to informal networks before contacting a formal agency, so it is equally important to ensure everyone is made aware of the support available to them and how someone can put a friend or family member in touch with the right support services.

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

64. Victims of domestic abuse may experience different barriers to disclosing domestic abuse and may have complex or multiple needs. There needs to be a range of specialist services available to help victims feel they can access guidance, advice, treatment services and support when needed.

65. There are clear, yet complex, links between domestic abuse and substance misuse. For example, the London Drug and Alcohol Network (LDAN) highlighted that women who have experienced gender-based violence are 5.5 times more likely to be diagnosed with a substance use problem over their

¹⁹ Safe Lives report 'A Cry for Health', November 2016
http://www.safelives.org.uk/sites/default/files/resources/SAFJ4993_Themis_report_WEBcorrect.pdf

lifetime.²⁰ We need to ensure specialist services are providing the right support, particularly to help with substance misuse issues.

66. There is also a clear link between domestic abuse and substance misuse with perpetrators. The LDAN report found that 93 per cent of domestic violence perpetrators surveyed with substance misuse problems reported that they were problematic substance users before they became domestically violent.²¹ In half of the cases, problematic substance use increased during incidents of violence. It is clear that drug and alcohol services are well placed to address the perpetration of domestic abuse. This reinforces the need to take a public health approach to addressing domestic abuse and ensure the health service is closely involved in transforming the response to domestic abuse.

67. It is also useful to highlight the 'Be a Lover not a Fighter' campaign in Cheshire and Merseyside, which took a public health prevention approach to domestic abuse.²² The aim of the campaign was to put a public health lens on a traditionally services and crime-led issue. The campaign took an innovative approach to the issue and trying to make it easier for people to discuss domestic abuse openly while at the same time complementing and enhancing locally delivered campaigns and intervention work carried out by the police, local authorities and domestic abuse support services, including the White Ribbon Campaign. There were key learning points identified as part of the campaign, for example the local areas where the campaign performed best were those with the strongest public health leadership on this issue and where good partnership working embraced innovation. We would encourage the Government to consider these areas of best practice and how learning can be shared to promote a public health approach to tackling domestic abuse.

It is important to state that there needs to be a greater emphasis on public health in the Domestic Abuse Bill. The recent JTAI report found, that whilst many public health and public safety interventions are easily accessible by anyone who needs them, for example stopping smoking, reducing harmful alcohol use, road safety awareness, weight loss etc. By contrast, although domestic abuse is demonstrably harmful, not only to the individual but to everyone around them, help can be very hard to come by. Probation services can only mandate an intervention for a domestic abuser if their primary offence is related to domestic abuse. This is a high bar. We need to ensure our efforts are focused on early intervention and prevention, and work with Directors of Public Health to prevent domestic abuse from occurring in the first place.

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.

²⁰ London Drug and Alcohol Network report: <http://www.drugwise.org.uk/wp-content/uploads/dvreport.pdf>

²¹ <http://www.drugwise.org.uk/wp-content/uploads/dvreport.pdf>

²² <https://www.nice.org.uk/sharedlearning/a-public-health-prevention-approach-to-domestic-abuse-the-be-a-lover-not-a-fighter-campaign-in-cheshire-merseyside>

- Criminal justice agencies to adopt appropriate enquiries into history of abuse at each stage of the criminal justice process
- **Dedicated support and/or IDVAs in women's services**
- **Encourage the use of schemes which divert vulnerable women out of the criminal justice system (where appropriate) and into services**
- Improve availability of support for domestic abuse victims in prisons
- **Support signposting into appropriate services for women who come into contact with the police**
- Don't know/no answer
- Other - please explain

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

- Availability of a GP at women-only services
- Availability of a nurse at women-only services
- Child contact sessions so that women who are not living with their children can have supervised access to their child
- **Delivery of health interventions such as mental health and substance misuse treatment at women-only services**
- **IDVAs located or linked to women-only services**
- **Improving access to benefits, finance and accommodation advisors at women-only services**
- Provision of employer interventions at women-only services to help individuals become work ready, including offering work experience and/or mentoring
- Don't know/no answer
- Other - please explain

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)?

- Yes
- No
- **Don't know/no answer**

68. The LGA does not take a view as to whether the new Domestic Abuse Protection Notice (DAPOs) should operate in the same way as the existing Domestic Violence Protection Notice (DVPOs). However we do think it is important to learn from the experiences and lessons learned from rolling out the DVPOs in 2014. For example, we know that DVPOs were piloted in three police force areas in 2011/2012, before being rolled out nationally. The Home Office's evaluation of the pilots found them to be "generally seen positively by practitioners and victim-survivors and were associated with a reduction in re-

victimisation, particularly when used in ‘chronic’ cases.”²³ When introducing the new DAPOs, there should be an opportunity for piloting the scheme and evaluating the success, before undertaking a national rollout.

69. In the Home Office’s assessment of DVPOs in 2016, magistrates suggested that understanding of DVPOs in their sector could be further improved through clearer guidance around the court process and, in particular, sentencing guidelines.²⁴ The Government will want to take this into account when introducing the new DAPO.

70. The Home Office found that whilst police participants reported a reasonably high level of awareness of DVPOs amongst frontline officers, there was lower levels of awareness amongst officers who were not regularly using them. Police participants suggested refresher training to those officers who had had limited contact with the scheme. The Home Office’s assessment also suggested police should consider the risks of coercive control in domestic violence cases to ensure DVPOs are not just targeted at cases with obvious signs of physical abuse.²⁵ The Government will need to ensure that all officers are made aware of the new DAPO process and that the new statutory definition of domestic abuse is embedded in frontline practice, to ensure the order is effective.

71. Findings from the Home Office’s assessment also showed a need to ensure victims are routinely made aware of local support. We recommend this is a feature of the new DAPO.²⁶ As part of the assessment, the Home Office were also considering how to implement effective interventions on perpetrators as part of the DVPO process. We would be interested to hear if this recommendation was taken forward and if any policy changes were made as a result.

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?

- **Yes**
- **No**
- **Don’t know/no answer**

²³ House of Commons Library paper, June 2017:
<https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN06337>

²⁴ Domestic Violence Protection Orders (DVPO), One year on – Home Office assessment of national roll-out, 2016:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/506148/2016-03-08_DVPO_report_for_publication.pdf

²⁵ Domestic Violence Protection Orders (DVPO), One year on – Home Office assessment of national roll-out, 2016:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/506148/2016-03-08_DVPO_report_for_publication.pdf

²⁶ Domestic Violence Protection Orders (DVPO), One year on – Home Office assessment of national roll-out, 2016:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/506148/2016-03-08_DVPO_report_for_publication.pdf

72. We are supportive of courts being able to impose positive requirements, as well as prohibitions, as part of the new order to help reduce the risk of further domestic abuse, if certain criteria can be met.
73. Firstly, the consultation suggests positive requirements of the new order could include attendance at a perpetrator programme, a parenting programme, or a drug and alcohol treatment programme. The aim would be to reduce the risk the perpetrator poses and to encourage behavioural and attitudinal change. Whilst we are supportive of this preventative approach, it is important to state this will need to be adequately funded.
74. The impact assessment suggests there could be a 30 percentage point increase in the proportion of DAPOs requiring a positive requirement as a condition due to the process change, resulting in approximately 14,500 DAPOs with positive requirements. It assumes the positive requirements will be funded by the police, local authorities, Police and Crime Commissioners, perpetrators and others. The impact assessment suggests the police will fund 4 per cent of the costs of the programmes, and other groups which includes local authorities will fund 96 per cent of the programmes (which amounts to £1.6 million a year). This is at a time when local government is facing unprecedented levels of demand, with an overall funding gap that will exceed £5 billion by 2020. If the DAPO increases demand for local government services, then this measure will need to be funded through the New Burdens Doctrine.
75. Secondly, we would expect there to be initial piloting of the new DAPO before national roll-out. There should be a formal evaluation process in place to ensure improvements and issues are picked up at an early stage and acted on. This will require effective data collection and information sharing across the relevant partners. As stated previously, consideration should also be given to the lessons learned from the Home Office's assessment of the DVPO and the DVDS one year on reports.
76. Thirdly, it is imperative that perpetrators are able to access the programmes within reasonable timescales. The recent JTAI report found that perpetrators have been encountering long waiting times for current perpetrator programmes and there is a lack of provision in some areas. In one case, the report found that a perpetrator had been identified as needing to complete a programme to address his abusive behaviour, but this programme had not begun by the time the perpetrator left prison because of long waiting times. If we are placing a requirement on perpetrators to attend certain programmes, as a condition of the DAPO, then we must ensure these services are readily available. Otherwise it will undermine the whole process.
77. Finally, the safety of the victim must be paramount. We want to ensure these new orders are effective and do not put the victim at further risk. There will be cases where prohibitions are more appropriate to protect the victim and this should be the priority.

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

78. Should electronic monitoring be introduced as a condition of the new DAPO, we agree it will need to be fully piloted to ensure it is an effective preventative measure in a domestic abuse context. The safety of the victim should be the priority. It is also important to ensure there are the necessary support services in place for both the victim and the perpetrator, alongside the conditions imposed by the order.

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

- **Yes**
- **No**

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

- **Strongly agree**
- **Agree**
- **Neither agree nor disagree**
- **Disagree**
- **Strongly disagree**
- **Don't know/no answer**

80. The LGA does not take a view on whether the guidance underpinning the Domestic Violence Disclosure Scheme (DVDS) should be put in to law. However, we think it is important to ensure the lessons learned from the Home Office's assessment of national roll-out, one year on for the DVDS scheme, are taken into consideration.²⁷

81. The Home Office's assessment found that practitioners felt that there was some variation across the country in the number of disclosures made by forces under the DVDS. Practitioners also felt that there was some inconsistency in information given in disclosures and variation in the service provided to victims. The police felt that there could be better consistency between forces in the follow-up support given to those who received non-disclosures i.e. those who were told there was no information to disclose.²⁸

82. The HMICFRS domestic abuse thematic report 2017 also identified inconsistencies in police forces using the scheme, low volumes of disclosures and discrepancy in practice between forces. The report found it disappointing that despite an increase in the number of recorded domestic abuse related crimes, there did not appear to have been a corresponding increase in the use of Clare's Law. HMICFRS suggested that forces need to raise awareness of this safeguarding method and ensure that victims are linked into specialist domestic abuse organisations who can provide additional support and advice.²⁹

²⁷ Home Office's assessment of national roll-out, one year on for the DVDS scheme, March 2016
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/505434/2016-03-08_DVDS_report_final_.pdf

²⁸ Ibid.

²⁹ HMICFRS thematic domestic abuse report 2017,
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575361/DVDS_guidance_FINAL_v3.pdf

We would support the Home Office taking forward this recommendation, and taking the HMICFRS report into consideration before changes are made to the DVDS.

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

83. We would be supportive of an awareness raising campaign on controlling and coercive behaviour to raise public awareness of the issue.

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?

84. We welcomed the changes in the sentencing guidelines issued in February 2018, which acknowledge domestic abuse can occur in a wide range of domestic settings and in various forms, including over text or email. The emphasis on ensuring sentences reflected the seriousness of domestic abuse when it involves children was an important change, which we supported. It is imperative that adequate support is provided to the victim in court cases, especially if children are expected to be involved in the case.

85. Councils want to see a shift towards disrupting the life of the perpetrator, rather than the victim. In order to achieve this, we need to develop accessible and effective interventions that are designed to reduce the number of perpetrators now and in the future. We think there is a role for the Domestic Abuse Commissioner to ensure further investment is made into perpetrator programmes and best practice is shared nationally.

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

- Yes
- **No**
- Don't know /no answer

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

86. Councils want to see a shift towards disrupting the life of the perpetrator, rather than the victim. In order to achieve this, we need to develop accessible and effective interventions that are designed to reduce the number of perpetrators now and in the future. We think there is a role for the Domestic Abuse Commissioner to ensure further investment is made into perpetrator programmes and best practice is shared nationally.

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
- Linking data to enable better tracking of interventions and reoffending
- Linking data to enable better understanding of the interactions/relationships between domestic abuse and other types of offending
- None of the above
- Don't know/ No answer
- Other - please explain

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

87. The creation of a Domestic Abuse Commissioner role could provide important leadership on domestic abuse issues. The Commissioner has the potential to make significant changes in the sector, if they have the right responsibilities, powers and resources. We have seen the success of such a post, through the appointment of the Independent Anti-Slavery Commissioner. This is a useful comparison to make, as the Commissioner role was created as one of the key provisions of the Modern Slavery Act, to oversee the impact of the legislation.

88. The LGA has worked closely with the Independent Anti-Slavery Commissioner's Office, to help share best practice in local government and raise awareness through regional workshops and conferences. This works particularly well because there is a supportive and collaborative relationship between councils and the Commissioner's office, which we would hope to see with the new Domestic Abuse Commissioner.

89. We would expect the Government to take into consideration how other Commissioner roles are working in England and Wales, including the role of the National Adviser in Wales for Violence against Women, Gender-based Violence, Domestic Abuse and Sexual Violence.

90. Following recommendations from the Independent Anti-Slavery Commissioner's Office at the All-Party Parliamentary Group on Domestic Abuse, we would suggest there is a formal reporting structure into Parliament, for example through the Home Affairs Select Committee, to ensure there is adequate parliamentary time to consider the Commissioner's annual report and take forward the Commissioner's recommendations.

91. It will be important for the Domestic Abuse Commissioner to be truly independent. SafeLives described it best when they said the Commissioner will need to be the 'ultimate critical friend' to Ministers, Government departments,

frontline professionals and local agencies. This is an issue that requires a range of partners to work across a multitude of policy areas. Whether it is housing, health, community safety, children's services or adult social care, we all need to work together to collectively raise standards.

92. The Commissioner's work should be victim-led and decisions taken should be informed by the experiences and guidance of victims of domestic abuse. If we want to see effective change, we need to listen to the people who have lived these experiences and learn from them about what more can be done to prevent these incidents from happening again.
93. The Domestic Abuse Commissioner will have an important role to play in facilitating learning and the sharing of information across different agencies to help implement changes at a national level. We think it is important for the Commissioner to ensure the lessons learned from Domestic Homicide Reviews (DHRs) are picked up at a national level to ensure effective action is taken.
94. The Commissioner also needs to avoid being too prescriptive. There is not a 'one-size-fits-all' approach to tackling this issue. Ring-fencing budgets and wedding ourselves to particular service models will ultimately harm those we are seeking to help. Domestic abuse victims often have multiple and complex needs, which is why local partners need the flexibility to provide the right mix of interventions, whether that is counselling, specialised support for minority communities such as BAME and LGBTQ+, or safeguarding for children. We need specialist services in our local areas to ensure people receive the right support and the right guidance at the right time.
95. While the Commissioner should be bold and ambitious in what they look to achieve, they must also be realistic about the financial climate that councils and their partners are operating in. This is a time when there are real financial challenges in local government. Councils face an overall funding gap of over £5 billion by 2020, with £2 billion needed to fill the children's services funding gap. The Commissioner will need to take into consideration wider Government reforms already underway, such as the new duties councils have undertaken due to the Homelessness Reduction Act in April 2018. Additionally there are going to be reforms to the supported housing and social housing models, as well as the Ministry of Housing, Communities and Local Government's audit of domestic abuse services, which need to be taken into account. The Commissioner should have an important role in articulating the case for investment in domestic abuse services.
96. The ultimate aim of the Commissioner should be prevent domestic abuse occurring in the first place. We think it is encouraging that the Domestic Abuse Bill places such an emphasis on early intervention and prevention, and we hope this approach is continued with the Commissioner's role.

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

- **Oversee compliance with the Specialist Domestic Abuse Courts Manual**
- **Oversee the Domestic Homicide Review Quality Assurance process, including any potential changes implemented following this consultation, feeding lessons learned into their recommendations**
- **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**
- **Require local statutory agencies to cooperate and provide information**
- **None of the above**
- **Don't know/no answer**
- **Other**

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

97. The Commissioner should not be overly prescriptive. There is not a 'one-size-fits-all' approach to tackling this issue. Domestic abuse victims often have multiple and complex needs, which is why local partners need the flexibility to provide the right mix of interventions, whether that is counselling, specialised support for minority communities such as BAME and LGBTQ+, or safeguarding for children. We need specialist services in our local areas to ensure people receive the right support and the right guidance at the right time. We are supportive of the dissemination of best practice to local areas and ensuring the lessons learned from DHRs are available at a national level, to improve understanding of this issue. The Ministry of Housing, Communities and Local Government is currently undertaking an audit of domestic abuse services in England which we hope will inform the Commissioner's work. It would not be helpful to duplicate this audit, given the time and resources it takes to monitor levels of provision and gather a comprehensive understanding of the services available in local areas.

98. 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?

99. The Home Office does not currently publish information about the key themes or learning points arising for DHRs to inform partners nationally. It will be some time before the Commissioner role comes into effect. It could be helpful, in the interim, for the Home Office to identify some areas of best practice to share with relevant partners. The LGA could help to disseminate this information to councils.

100. It could be beneficial for the Domestic Abuse Partnership Board in the local area to be notified of all DHRs and their outcomes. The local safeguarding partnership, where relevant to the children's agenda, could also be updated. It would also be useful to have a central point of information to include an approved/recommended list of DHR chairs and authors to help local authorities when conducting DHRs.

101. The Victims Commissioner, and the forthcoming Victims Strategy could also help raise awareness of the lessons learned from DHRs.

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

102. Some community safety partnerships produce a report evidencing the impact of the recommendations from the DHR a year after the review has taken place. This has helped some local areas hold agencies to account and provide evidence of their progress and delivery. Regular reviews of progress would help to increase accountability and improve shared learning. Furthermore, it would be helpful for DHR learning to be shared with safeguarding boards.

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?

103. As stated previously, there needs to be additional training and adequate funding of local services to help promote effective practice in commissioning and the delivery of services.

104. It could be useful to assess whether the Multi-Agency Risk Assessment Conference (MARAC) model is working effectively and how this could be improved.

What role should local areas play in sharing good practice?

105. As the membership organisation working on behalf of local government, the LGA helps to share best practice and improve working with local councils. We will continue to work with the Government to help share good practice on this important issue.

What more can the government do to encourage and support effective multi-agency working, in order to provide victims with full support and protection?

106. The key to effective multi-agency working is a culture amongst local partnerships and agencies that supports and encourages such an approach. Various partnership processes and structures have been suggested as the means for improving multi-agency working. However these only ever work as well as the level of commitment to partnership working among the local partners, and a willingness to work collaboratively together. Instead we should be incorporating training on multi-agency working into the courses that staff take to become for example police officers, social workers, doctors and nurses.

107. Central government should also encourage a change in culture to multi-agency working across Whitehall. Local authorities and the police still struggle to engage health partners in multi-agency approaches, partly because the wider health benefits of domestic abuse interventions by non-health agencies are not as widely recognised as they should be. An emphasis on the benefits of multi-agency working in the health service would assist other local agencies better support victims.

108. In addition to this, local agencies will look to Whitehall to demonstrate effective cross-departmental collaboration. Whilst this is a Home Office and Ministry of Justice led consultation, the measures need to go beyond the criminal justice and policing system. Improving the response to domestic abuse requires changes in housing, health and education services to truly transform the response to domestic abuse. These must be central priorities in the upcoming Bill.