

## **The Government has embarked on a policy to create two separate strategies on Domestic Abuse and Violence Against Women and Girls: Why we are concerned and what can be done about It?**

As specialist black and minority women's organisations, we express our deep alarm at the Government's decision to move towards a dual strategy approach to violence against women and girls (VAWG) and domestic abuse (DA). On 19 October 2020, the Government announced that it will separate the VAWG Strategy from the DA Strategy without any prior consultation or assessment as to the efficacy and impact of such an approach. On 19 November 2020, a number of VAWG organisations and experts wrote to the Minister for Safeguarding, Victoria Atkins, outlining our concerns. The Government's reply was to proceed with its decision nonetheless. We consider the move to be needless and profoundly regressive.

### **The problem**

The decision will fragment the existing VAWG Strategy which was established in 2009 (renewed in 2010) following a long campaign by the VAWG sector to address domestic abuse and other forms of gender-based violence in a systematic way using a human rights framework. (See Realising Rights, Fulfilling Obligations: A Template for an Integrated Strategy on VAWG in the UK (EVAW, 2008).

For decades, we have worked towards creating a single, comprehensive, integrated, rights-based framework for addressing gender-based violence; a framework that is intersectional in its approach, inclusive of all marginalised groups of women and founded on the principle of non-discrimination, gender equality and human rights. Although the content and implementation of the Government's VAWG Strategy has been far from satisfactory, it nevertheless laid down a sound basis for combatting VAWG. Many of us view the current VAWG Strategy as an evolving framework that can be strengthened and built upon to create a more inclusive and effective foundation for understanding and eradicating gender-based violence in all its forms. Our fear is that this unfinished work will now suffer a serious setback.

The current VAWG Strategy does not pay sufficient attention to specific forms of abuse including sexual abuse or emerging forms of culturally specific abuse, or to the extensive barriers faced by minority, migrant, disabled and young women to name but a few. But these gaps will widen, rather than close, under the new dual strategy approach because it will undermine the 'joined up' integrated thinking that is so necessary to the protection and prevention of abuse, and to the prosecution of crimes of violence against women and girls.

The dual strategy approach comes at a time when we already struggle to ensure that culturally specific and emerging forms of abuse and harm are properly reflected in the VAWG Strategy and addressed within a human rights as opposed to a faith or community based framework, that reinforces culturally relativist policies and practices. What we need is a single

comprehensive and integrated framework of policies for protection and assistance that is aligned to the provisions of the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and the Istanbul Convention, which the Government is expected to ratify. Contradicting this approach will seriously undermine the efforts we have made in our communities to promote an understanding of abuse as part of a continuum, with its roots in gender inequality – without which there can be no change in attitudes to prevent such gender-based violence. It is also vital that we have a single framework that references the many intersecting structural barriers that black and minority women face, without which there is a serious risk that frontline services for vulnerable groups in particular, will be ill-thought out or not provided at all.

### **No justification**

Despite our efforts, we have yet to be given cogent reasons as to why the Government considers it necessary to fragment the current VAWG Strategy, and instead develop what appear to be several strategies that will in any event vastly overlap. Apart from undoing our understanding of VAWG as a dynamic and gendered phenomenon encompassing a continuum of multiple and overlapping forms of abuse, it will be an administrative nightmare to implement. We have been told that the two-strategy approach is necessary because a) the Government deems it to be so, b) it will give the VAWG sector ‘two bites of the cherry’ and c) it will allow the Government to focus on other forms of VAWG rather than just domestic abuse. None of these responses are based on sound evidence or proper prior consultation with the VAWG sector. There has been a complete lack of transparency in relation to the change in policy. A failure to consult the VAWG sector with its long history and experience of working with survivors and its wealth of expertise regarding VAWG policy, has not only resulted in an ill-informed decision, but has also set a dangerous precedent on decision making for future policy changes in this area.

We strongly dispute the idea that a dual strategy approach will strengthen policies or services in relation to either domestic abuse or VAWG. In fact, it risks the de-gendering of domestic abuse, the de-prioritisation of certain forms of VAWG and de-funding smaller specialist services. It will create confusion and silos of understanding VAWG, encourage even more inconsistency in implementation and dilute and weaken our approach to new and emerging forms of abuse. It will also create unacceptable levels of pressure on women’s organisations through the duplication of work, particularly at this time when the sector is already exhausted and under-resourced due to exceptionally high demand created by years of austerity and more recently by the Government’s response to the Covid-19 pandemic. It will place extra burdens on smaller specialist BME organisations in particular, since it will require even more resources to engage with multiple consultations on VAWG, DA and other similar strategies. Failure to do so, will lead to an even greater exclusion of marginalised women. A comprehensive and integrated VAWG strategy on the other hand will help to avoid these pit falls.

Consultation on the dual strategy approach is now underway which includes surveys for the public, as well victims and survivors. These surveys have been widely condemned as ethically and methodologically unsound. They threaten to undo our shared understanding of the causes and consequences of VAWG. Many of us have refused to participate in the surveys despite the Government's offer to pay organisations to obtain survivor's participation.

### **A single framework for VAWG based on equality and human rights principles is needed**

The commitment of the Government to tackle violence against women and girls lies in the comprehensiveness of the framework and policies adopted. It also lies in its vision and breadth of understanding of the interconnectedness of forms of gender -based violence and its impact on the most vulnerable groups of women and girls. Violence against women does not occur in a vacuum. It thrives in contexts where women are viewed as inferior and unequal. This is why it is necessary for this Government to adopt a single comprehensive, holistic and integrated framework that enables us to tackle gender-based violence and gender inequality simultaneously and effectively. What we have at the moment is nothing short of an ill-conceived and haphazard approach that will cause confusion and fragmentation, threatening to undo the significant progress that has been made by women and girls in the field of VAWG so far.

We urge the Government to reverse its decision to adopt a dual strategy approach to VAWG and Domestic Abuse and instead return to and strengthen, a single, comprehensive integrated VAWG Strategy, mirroring the standard-setting provisions of the Istanbul Convention. Moreover, we urge the Government to develop such a strategy through meaningful collaboration with the VAWG sector to ensure that it reflects all forms of VAWG and the needs of all women and girls and is fully resourced.

### **What you can do**

We urge everyone who cares about gender equality and justice to use the consultation process to write to the Government Minister, Victoria Atkins, urging her to reconsider her decision. The dual strategy approach is conceptually unsound and neither viable nor warranted. If implemented it will represent a profoundly gender regressive development.

We have provided a template email on our website.