



## **‘Officially Invisible’: the experience of women victims and survivors of domestic and sexual violence in relation to gender equality in the UK**

**NGO Report from Aurora New Dawn assessing the United Kingdom Government’s progress in implementing the United Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)**

June 2013

**Written and compiled by:**

Sarah Cheverton, Aurora New Dawn Writer in Residence

1

## About Aurora New Dawn

Aurora New Dawn was founded in 2011 by a small group of women with over 30 years of collective experience working in the violence and abuse sector. The organisation was created in direct response to the public sector cuts threatening local authority service provision to victims and survivors of violence and abuse. Aurora New Dawn is currently a Company Limited by Guarantee and is working towards achieving charitable status.

Representing the voices and experiences of victims and survivors is our central priority. Because of this, our roots are found in feminist advocacy and activism, which question dominant cultural assumptions about gender, stereotypes about men and women, and about the inevitability of gendered violence. We believe that violence against women is both a cause and a consequence of gender inequality and that ending violence is central to achieving a world where no one is limited by their sex or gender. Our work is guided by the principles set out in CEDAW.

Our vision is to contribute to the global movement to end discrimination against women. We offer protection, safety and support to victims and survivors of violence, and play a role locally and nationally as organisational advocates and campaigners for gender equality and an end to VAWG.

Our services include:

- one to one work
- advocacy and group support
- working in partnership across the private, public and voluntary sector
- providing training and education programmes
- promoting equal opportunities through our ongoing campaigns

Find out more about our work at [www.aurorand.org.uk](http://www.aurorand.org.uk) or contact:

### Shonagh Dillon, Chief Executive

Email: [info@aurorand.org.uk](mailto:info@aurorand.org.uk)

Tel: 023 9247 9254

Twitter - @auroranewdawn

Facebook - [www.facebook.com/AuroraNewDawn](https://www.facebook.com/AuroraNewDawn)

## Introduction

As a frontline organisation working in the Violence Against Women and Girls (VAWG) sector, we have confined our remarks and recommendations to our field of expertise. We reflect the view from the grassroots of frontline VAWG service provision, as a client-led advocacy and campaigning organisation working with victims and survivors of domestic and sexual violence.

Our report aims to offer a particular insight into the delivery (or lack of) of the UK's CEDAW obligations from the grassroots perspective of a small, voluntary sector organisation working in the VAWG sector, particularly:

- providing commentary based on the experiences of victims and survivors working with Aurora New Dawn's Independent Domestic/Sexual Violence Advocates (IDVAs and ISVAs)
- highlighting the firsthand impact of Government policy on the voluntary VAWG sector

Having read and absorbed the shadow reports of our sister organisations, we have sought to avoid duplication of issues highlighted by others and do not comment on specific CEDAW Articles where we have nothing to add to existing submissions. Aurora New Dawn fully endorses the shadow reports submitted by our sister organisations in the UK and Devolved Administrations.

### Article 1 – Elimination of Discrimination

The Government's policies do not acknowledge or address the international body of knowledge that recognises and evidences the role of VAWG as a cause and consequence of gender inequality. As highlighted by the UK CEDAW Working Group's Shadow Report<sup>1</sup> (hereafter 'the Shadow Report'), this failure is particularly evidenced in the Government's localism and devolution policy programme, which has led to severe cuts in frontline services provided by the public and voluntary sector.

The impact of the cuts is compounded by a clear lack of understanding in local government of the UK's obligations to comply with CEDAW. In our local campaigning (e.g. in relation to the licensing of sexual entertainment venues or SEVS); in our advocacy (e.g. on the local impact of frontline cuts); and in our partnership working with local authorities (e.g. via the delivery of our frontline IDVA, ISVA and IRIS services)<sup>2</sup>, we note a general lack of awareness of the UK's CEDAW obligations, particularly among local councillors and some local authority officers. This lack of awareness feeds directly into local decision-making and policy pertaining to VAWG service delivery and commissioning (as well as the promotion of broader gender equality) and actively impedes the fulfilment of the UK's CEDAW obligations on a local level.

---

<sup>1</sup> UK CEDAW Working Group, 2013, *Women's Equality in the UK – A health check*, P39 para 3.15)

<sup>2</sup> Our frontline services include: Independent Domestic Violence Advocates (IDVA); Independent Sexual Violence Advocates (ISVA); and Identification and Referral to Instigate Safety (IRIS) projects.

**How does the Government currently monitor and oversee compliance with the UK's CEDAW obligations in local government; and what, if any, guidance/training is provided to local councillors and officers on these obligations?**

**Recommendations**

- involve national and local voluntary women's sector organisations in the design and the delivery of a national training and guidance programme on the UK's CEDAW obligations
- ensure that training and guidance programmes on the UK's CEDAW obligations is made compulsory for all local Councillors

**Article 2 – Obligations to eliminate discrimination**

Cuts to local authority frontline services for victims and survivors are compounded by the reluctance of local authorities to openly acknowledge and report cuts. One local authority in our geographical area of urban South Hampshire has consistently denied cuts to their own VAWG services, particularly to the IDVA service, despite a clear reduction in service provision.

This position of denial is carried into local authority commissioning processes for VAWG frontline service delivery to victims and survivors, which makes it possible for (growing) gaps in service provision – and the real needs of victims and survivors - to remain unacknowledged and 'officially invisible' on a local level. We are also aware that many local frontline organisations are reluctant to formally highlight these gaps for fear that doing so may impact on future funding or commissioning with local councils. The lack of an imperative from Government to monitor VAWG service provision effectively sanctions the invisibility of cuts to services.

This element of denial about the impact of Government policy makes it very difficult to ensure cohesive partnership working across the VAWG sector on a local level, particularly in assisting the voluntary sector both to maintain an accurate overview of service provision and to work in partnership with the public sector to 'plug the gaps'.

This has many indirect consequences. For example, national campaigns rolled out locally to raise awareness of domestic and sexual violence do not always take note of available service provision, particularly in light of the impact of the cuts; and such campaigns can further 'whitewash' or mask gaps in service provision locally. One example of this in our geographical area is the recent Home Office campaign to raise awareness of domestic/partner abuse among young people, which was rolled out by one local authority despite the fact that the only Children and Young Person's IDVA post had recently been cut. Despite a campaign inviting young people to address any experiences of abuse or violence, there is now no dedicated IDVA service for victims and survivors aged under 18 years in the area.

**What action is the Government taking to monitor and share information on the impact of Government funding cuts on frontline service delivery to victims and survivors of domestic and sexual abuse?**

**Recommendation:**

- ensure VAWG awareness-raising campaigns are supported by clear information on available services for victims and survivors; and that national campaigns acknowledge and address gaps in service provision to prevent such campaigns masking the gaps

### **Article 3 – Development and advancement of women**

We are increasingly concerned about the dilution of specialist services to victims and survivors of VAWG as an impact of Government funding cuts<sup>3</sup>; and the lack of data to assess the impact of cuts by geographical and local authority area<sup>4</sup>. We are particularly concerned that the lack of monitoring of frontline service provision acts as a disincentive for local authorities to take a proactive approach to addressing these gaps in partnership with the local voluntary sector. Furthermore, the lack of Government oversight of VAWG service provision may also act as an effective incentive for local government cuts to VAWG services, particularly compared to service areas where provision is monitored, for example in children’s services or adult social care.

#### ***When does the Government intend to monitor and map frontline service provision for victims and survivors of VAWG in the UK?***

#### **Recommendations**

- ensure that frontline service delivery dedicated to the prevention of, and early intervention in, VAWG is regularly mapped and monitored across the UK – in detail, and in both the public and voluntary sector – by the Government
- ensure that identified gaps in service provision are regularly published and disseminated to the frontline VAWG service sector in order to underpin the coordination of VAWG service design and delivery in each geographical area

### **Article 5 – Sex roles and stereotyping**

SEVs or ‘lap-dancing’ clubs normalise sexual harassment by presenting women as commodities to be bought and sold, and as constantly sexually available. Because of this, such clubs effectively create ‘no-go’ areas for women of all ages, who are more likely to feel (and be) unsafe in their locality. As such, SEVs directly contravene the UK government’s commitment under CEDAW to address sex roles and stereotyping, to promote gender equality, and to tackle the discriminatory attitudes that underpin and perpetuate VAWG. Despite the UK’s CEDAW obligations, recent legislative changes regarding the licensing of Sexual Entertainment Venues<sup>5</sup> – with particular

---

<sup>3</sup> Towers J and Walby S (2012) *Measuring the impact of cuts on the provision of services to prevent violence against women and girls*, Trust for London, London

<sup>4</sup> UK CEDAW Working Group, 2013, *Women’s Equality in the UK – A health check*, P41 para 3.23

<sup>5</sup> With effect from 6 April 2010, Section 27 of the Policing & Crime Act 2009 amended Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982, introducing a new category of sex establishment called "Sexual Entertainment Venue" which, if adopted by a local authority, requires premises in that area who provide "relevant entertainment", such as lap dancing to obtain a Sex Establishment Licence.

reference to ‘lap-dancing’ clubs – are not mandatory for local authorities, which have the freedom to decide whether and when new provisions come into force in each area.

Because of the internationally recognised links between the objectification/sexual commodification of women and girls and VAWG, Aurora New Dawn has provided submissions and deputations directly to councillors in our area as they consulted on the licensing of SEVs. We witnessed firsthand how the lack of awareness of the UK’s CEDAW obligations –including among local licensing officers - acts as a clear impediment to the ability of local councillors to make informed policy decisions pertaining to SEVs. This effectively places an additional burden on the local voluntary women’s sector to lead campaigns on the gendered impact of SEVs on women and girls – at the precise time the sector has diminishing resources to do so.

The lack of awareness of UK CEDAW obligations facilitates decision-making on SEV licensing policies without any explicit reference to gender equality, which (as we have noted firsthand during several decision-making sessions with a local authority in our area) allows Councillors to dismiss such arguments as inadmissible or irrelevant on the grounds that they amount to ‘moral reasoning’ and are thus legally inadmissible to decision-making processes on licensing.

***For what reason are the amendments to SEV licensing arrangements voluntary, rather than mandatory, for local authorities, and what action does the Government intend to take to ensure that local government councillors fully understand the implications of their decision-making as part of their broader equality duties and the UK’s CEDAW obligations?***

#### **Recommendations**

- **ensure that local officers and councillors must be seen to take into account the gendered implications of local authority policy, including the UK’s CEDAW obligations**
- **review the voluntary basis of current Government legislation on SEVs with a view to making it mandatory for local authorities to adopt a nil cap on SEVs**

#### **Article 7 – Political and public life**

We note the negative impact of the absence of women in decision-making processes, including:

- representation of women among local councillors: as one example, in one city within our service area of urban South Hampshire (Portsmouth) only 24% (10 of 42) local councillors are women; 36% (5 of 14) local wards are represented exclusively by men; and only 1 ward of 14 is represented by a majority of women (2 out of the 3 serving councillors)
- representation of women on Local Enterprise Partnerships and Enterprise Zones<sup>6</sup>: in South Hampshire, Solent LEP is led by an all-male Board of Directors

---

<sup>6</sup> Local Enterprise Partnerships are partnerships between local authorities and businesses. They decide what the priorities should be for investment in roads, buildings and facilities in the area. LEPs can apply to become Enterprise Zones, which can take advantage of tax incentives and simplified local planning

- representation of women on NHS Clinical Commissioning Group (CCG) Boards: in the two cities of urban South Hampshire, Portsmouth's CCG Board comprises 5 of 12 women voting members and 1 in 3 non-voting members; while by contrast Southampton's CCG Governing Body comprises only 4 of 13 women members

In addition to local government, the absence of women from such newly-introduced and highly influential partnerships is of particular concern given the growing strategic, decision-making and funding responsibilities of LEPs and CCGs in the UK's sub-regions. Both partnerships hold responsibility for the awarding of funds to the local voluntary and private sector, for example.

The absence of women from these new bodies effectively increases the probability that considerations of gender equality or the potential gendered impact of decisions will be omitted from key decisions at a local and regional level; and increases the risk that the women's sector – and the needs of victims and survivors – will become marginalised and in places, invisible.

***What measures will the Government introduce to monitor the representation of women on new strategic partnerships in the UK sub-regions, including CCGs and LEPs; what steps will they take to promote and ensure gender equality in their membership; and what guidance is or will be provided to such partnerships to ensure their understanding and implementation of the UK's CEDAW obligations?***

#### **Recommendations**

- **Ensure women's representation on new strategic partnerships in the UK sub-regions, including LEPs and CCGs, is monitored**
- **Ensure strategic partnerships understand and implement the UK's CEDAW obligations**

#### **Article 9 – Nationality**

Our main concern in this area is the ongoing suffering of women with No Recourse to Public Funds (NRPF). We fully endorse the Shadow Report's findings on this issue<sup>7</sup> and offer the following supporting information:

- Victims of violence with NRPF are frequently supported by refuge services that are woefully under-funded; our sister training organisation, PTC, recently spent £6k to provide a victim with NRPF with accommodation as the refuge could not absorb the cost
- Many victims with NRPF are forced to return to violent partners, and many disappear from the system altogether
- Although the Government has made some concessions to ease the experience of victims with NRPF, in practice accessing support is still a lengthy and dangerous process for

---

regulations (DCLG: <https://www.gov.uk/government/policies/supporting-economic-growth-through-local-enterprise-partnerships-and-enterprise-zones/supporting-pages/local-enterprise-partnerships>)

<sup>7</sup> UK CEDAW Working Group, 2013, *Women's Equality in the UK – A health check*, P75 para 9.23

them. In a sector already under-resourced in dealing with victims and survivors with access to public funds, the additional costs, resources and time can act as a disincentive for services, particularly in the refuge system

**We endorse the recommendations set out in the Shadow Report under this Article<sup>8</sup>.**

### **Article 10 - Education and skills**

The lack of monitoring of the VAWG sector's outreach with schools and young people means that the impact of cuts upon local outreach projects that provide sexual health and relationship education to local schools is currently unmeasured, unacknowledged and 'officially invisible'.

Although Aurora New Dawn does not deliver outreach work with schools, we are concerned about the reduction of existing outreach projects for children and young people that promote sexual health and healthy relationships and raise awareness of VAWG. This is not only of concern in monitoring the incidence of VAWG within schools, but also because at least some of the children and young people in local schools today will become the perpetrators and victims of violence of tomorrow. Early preventative work with children and young people is vital to reducing domestic and sexual violence in the future and we endorse the recent report *Deeds or Words*<sup>9</sup> by the End Violence Against Women coalition on this subject.

***When will the Government take meaningful action to monitor and address the current incidence of sexual harassment, abuse and violence against girls in schools and what action will the Government take to prevent such violence in the future?***

#### **Recommendation**

- **Ensure implementation of the 10 priorities set out in EVAW's *Deeds or Words* report**

### **Article 12 – Healthcare and Family Planning**

We are concerned there is no formal imperative for the recently formed Health and Wellbeing Boards<sup>10</sup> (HWBs) to take account of gendered issues and equalities; and about the lack of interest in VAWG at a local level, including its absence as a key priority in the Joint Strategic Needs Assessments (JSNAs) and Commissioning Strategies.

The inter-relationship between local authorities, CCGs and HWBs also has problematic impacts. We recently raised strong concerns with our local authority about a Commissioning Review on

---

<sup>8</sup> UK CEDAW Working Group, 2013, *Women's Equality in the UK – A health check*, P76

<sup>9</sup> EVAW (2013) *Deeds or Words. Analysis of Westminster Government action to prevent VAWG*, [http://www.endviolenceagainstawomen.org.uk/data/files/resources/57/Deeds-or-Words\\_Report.pdf](http://www.endviolenceagainstawomen.org.uk/data/files/resources/57/Deeds-or-Words_Report.pdf)

<sup>10</sup> The Health and Social Care Act 2012 created the new Health and Wellbeing Board (HWB) which is charged with improving local health and social care, and reducing health inequalities. The board has statutory responsibility for the delivery of local Joint Strategic Needs Assessment and Joint Health and Wellbeing Strategies.

Domestic Abuse that underplayed the existence and impact of local authority service cuts, which went ignored. This Review was then employed by the HWB as part of their evidence base. It is worth noting that the HWB in question counts only one woman, a local Councillor, in its 12-strong membership: highlighting the multiple impacts on victims and survivors of a lack of awareness of UK's CEDAW obligations; a lack of understanding of gender inequality and VAWG; and a lack of women's representation in decision-making.

**We endorse the recommendation of the Shadow Report under this Article<sup>11</sup>.**

### **General Recommendation 19 – VAWG**

The Government's funding cuts have already resulted in a clear loss of expertise within, and loss of resources for, local authority frontline VAWG services. New local authority commissioning processes are now forcing the specialist women's VAWG sector into competition with generic service, private providers, leading to a loss of expertise in the gendered dynamics of domestic and sexual violence<sup>12</sup>. In our geographical area (representing several local authorities), we note various impacts of the funding cuts and new commissioning processes:

- New commissioning strategies for local VAWG services reflect a loss of expertise, containing errors, omissions and a lack of awareness pertaining to existing levels of service provision in the voluntary sector (see above)
- The impact of public spending cuts threatens to crucify the VAWG sector, which increasingly faces the impossibility of identifying sustainable funding sources to maintain frontline services providing specialist, dedicated support to victims and survivors
- Loss of expertise in local authority frontline VAWG services e.g. in one recent case a lack of understanding at management level of the difference between 'stopping abuse' and 'reducing risk' revealed in a local authority commissioning strategy on domestic violence
- Shifting resources – and workloads - from dedicated and specially-trained IDVA posts to lower-grade support workers often with no recognised formal training, reducing the quality and level of support to victims and survivors and increasing risk; in one case, support workers now limit the support offered to victims and survivors to just one month
- Supplementing reduced VAWG service capacity by requiring other local authority services (including social care staff, housing officers, tenancy support officers, and children's centre workers) to offer support and risk assessment to victims and survivors
- Without specialist expertise, the wrong advice is frequently given to victims and survivors, with potentially fatal consequences. The absence of dedicated support, particularly in cases of domestic abuse, may cause particular areas of professional conflict e.g. social care staff working with children may advise a victim to leave the perpetrator,

---

<sup>11</sup> UK CEDAW Working Group, 2013, *Women's Equality in the UK – A health check*, P111

<sup>12</sup> <sup>12</sup> UK CEDAW Working Group, 2013, *Women's Equality in the UK – A health check*, P182, para 19.47

without clear awareness that this is the most dangerous time for survivors, when serious harm or murder are more likely to occur

- As women are disproportionately represented in the public sector, shifting VAWG service delivery to non-specialist service areas impacts on non-specialist support workers who have personal experiences of VAWG and are not adequately trained, supported or supervised. Such staff are likely to be re-traumatised by this
- Reduction in the quality and level of local authority training programmes aimed at professionals dealing with victims and survivors of VAWG, including in specialist areas such as FGM, Forced Marriage and HBV

We are concerned about the ongoing impact of local authority VAWG service contracts being awarded –particularly on the basis of cost-cutting – to generic private sector suppliers instead of voluntary sector specialist VAWG service providers, as highlighted by a recent report from UK social enterprise Kazuri<sup>13</sup>.

Overall, however, we are profoundly concerned that the funding cuts have resulted in local authority VAWG service managers being placed under significant and diverse pressure to appear to deliver ‘more for less’, while actually just delivering less at a lower standard. Due to staffing cuts in the local authority, an increasing number of managers with little or no previous or recent expertise in the VAWG field are expected to manage VAWG services, including commissioning processes. This has already led to the creation of unrealistic and ill-informed service planning and delivery that is potentially dangerous to victims and survivors of VAWG in our geographical area.

***When will the government begin to monitor and assess the loss of the specialist expertise provided by the VAWG sector as a result of local commissioning practices and how does it intend to measure and address the impact of awarding specialist services to generic service providers?***

#### **Recommendation**

- **That the Government immediately ascertain and address the level of loss of specialist VAWG services across the UK, including cuts to local authority frontline VAWG services and voluntary sector frontline VAWG services**
- **That the Government investigate the extent to which generic private sector suppliers have already replaced specialist and dedicated voluntary sector VAWG organisations in frontline VAWG service delivery as a result of local authority commissioning practices**
- **That the Government create and implement compulsory guidelines for local authority service commissioning, in order to prioritise specialist and dedicated VAWG service providers over generic service providers**

---

<sup>13</sup> Kazuri (2013) *Carers or Captors? Report to the Home Affairs Select Committee Inquiry on asylum*, [http://kazuri.org.uk/images/PDFs/Carers\\_or\\_Captors\\_and\\_complaints.pdf](http://kazuri.org.uk/images/PDFs/Carers_or_Captors_and_complaints.pdf)