



Drive Partnership Response: Government Consultation on Transforming the Response to Domestic Abuse

“Drive is the first response of its kind working with high-harm perpetrators of domestic abuse to break the cycle of abuse and keep victims safe. Drive and our partners have been working for the past two years to develop this approach. We have observed, and worked to address, many of the systemic gaps to intervening with this group. In this response we want to share our learnings so that the approaches that Drive and our partners have adopted can be used more widely.”

Summary of recommendations

Based on our learnings and existing data and evidence we propose that there is a **national systemic change in the response to perpetrators of domestic abuse** aimed at effective disruption and changing of abusive behaviour. We know from Drive, and with the opportunities presented through this Bill, that this is achievable through:

1. **Every police force area establishing a forum** to coordinate a multi-agency response to high-risk perpetrators, adhering to nationally agreed and consistent standards;
2. **Nationwide availability of quality assured perpetrator responses tailored to meet the needs of specific cohorts** including:
 - o one-to-one interventions with high-harm complex needs perpetrators, whose complex needs and engagement profiles are different from those suitable for more long-established structured group work programmes;
 - o structured group work programmes;
3. **An improved police response to perpetrators** through training and consistency in the use of existing and new civil powers (such as DVPOs, DVPNs and the proposed DAPO) backed up by effective systemic processes and sufficient resources;
4. **Better data collection and information sharing** including:
 - o a robust national perpetrator dataset and independent analysis of that data on a regular basis;
 - o a process to track high-risk perpetrators cross border. A national network of multi-agency perpetrator panels has the potential to provide the infrastructure to develop much needed cross-border information sharing processes and protocols;
5. **Oversight, scrutiny and quality assurance**
 - o the DA Commissioner to cover perpetrators of DA, as well as victims/survivors. This creates the opportunity to provide coherence to a national approach to perpetrators of domestic abuse including funding and commissioning approaches that create a pathway and differentiated range of interventions matched to the needs of different perpetrator cohorts;
 - o a national approach for quality assurance, workforce development, data collection, innovation and sharing best practice that spans the voluntary, public and private sectors;
6. **A collaborative review of commissioning**, aimed at developing a national system of sustainable long-term commissioning and funding models.

About the Drive Partnership

Each year more than 100,000¹ people in the UK are at high and imminent risk of being murdered or seriously injured as a result of domestic abuse. Services rightly focus on meeting the needs of victims, but too often perpetrators are not held to account, and their abusive behaviour continues. Less than 1% of perpetrators get a specialist intervention that might prevent future abusive behaviour² and as a result there is a high level of repeat victimization with the same victim or future partners / family members³. To deliver long term sustainable change and reduce the number of victims – we must challenge perpetrators to stop.

Drive is a new approach that is designed to test, develop and evaluate a model to tackle and change the behaviour of high harm perpetrators of domestic abuse. It implements a whole-system approach using an intensive case management approach alongside a coordinated multi-agency response. It works closely with the police, probation, victim services, children social services, housing, substance misuse and mental health teams. It focuses on increasing victim safety by combining disruption and behaviour change interventions alongside the crucial protective work of victims' services.

The Drive Project is a partnership between Respect, SafeLives and Social Finance. The pilot projects started in Essex, South Wales and West Sussex in 2016, funded by Police and Crime Commissioners, Local Authorities, the Police Innovation Fund, Lloyds Bank Foundation for England and Wales, Tudor Trust and Comic Relief. In 2018, funded by the Police Transformation Fund, the Drive intervention is to be tested in the following areas: Croydon in London, West Midlands, West Mercia and South Wales.

To reduce the number of domestic abuse victims, we must reduce the number of perpetrators. We aim to change the public narrative from 'why doesn't she leave' to 'why doesn't he stop?'

The Drive Partnership welcomes the opportunity the Domestic Abuse Bill has created to focus on the perpetrators of domestic abuse who are so often ignored in policy debate. Almost half of all the perpetrators on Drive have previous arrests for domestic violence⁴ – by focusing on reducing the harm perpetrators can cause, as well as improving the support for victims and their children, we hope to improve the lives of victims and survivors in the future.

Consultation response

1. The Model Approach to Perpetrators

1.1 National systems change in the response to perpetrators of domestic abuse is required for effective disruption and changing of abusive behaviour, and this is achievable

The Domestic Abuse Bill provides a valuable opportunity to strengthen the legislative tools available to assist in directly and robustly tackling the behaviour of the perpetrator of domestic abuse. It also provides the opportunity to build on learnings from practice interventions designed to change perpetrator behaviour and create reductions in abuse. We very much welcome these opportunities.

Our experience in delivering Drive over the past two years, tells us that existing tools, already available to the police, are **not used as consistently and as effectively as they could be**. It also shows us that new interventions such as Drive, which targets individuals to disrupt and change abusive behaviour, require an **effective systemic multi-agency collaboration** and response to maximise its potential at scale. The development of new legislative sanctions and new interventions/approaches must therefore be considered hand in hand with the systems, processes and skills required to maximise their efficacy and increase the likelihood of success.

It is national systems change in the response to perpetrators of domestic abuse that will create the space for effective coordinated multi-agency information sharing and action. Based on learning from the Drive Project pilot, our response below sets out the core systems change elements that are

¹ SafeLives (2015), Getting it right first time: policy report. Bristol: SafeLives.

² Please see Respect DVPP Commissioning Guidance for Police and Crime Commissioners 2013. There are around 3,500 spaces on Perpetrator Programmes, compared to an estimated 400,000 potential perpetrators of chronic partner abuse (<1%). Accessible at: <http://www.senedd.assembly.wales/documents/s30732/GBV%2090b%20-%20Respect.pdf>

³ 27% of cases heard at MARAC are repeat. This might mean the same victim or a future partner / other family members. SafeLives MARAC data (12 months 01/10/16 to 30/09/17). Accessible at: <http://www.safelives.org.uk/practice-support/resources-marac-meetings/latest-marac-data>.

⁴ Drive Project Data, Service User Demographics, 24 months to end of Year 2 Quarter 4 (based on 526 service user cases)

necessary to transform our national approach to perpetrators of DA. In our experience it is the combination of these elements – not any one alone that will move the needle. The commitment of the Home Office to look holistically at the issue of domestic abuse offers a real potential for transformation.

1.2 Need for every police force area to establish a forum to coordinate a multi-agency response to high-risk perpetrators, adhering to nationally agreed and consistent standards

Domestic abuse accounts for 10% of all recorded crime and over 30% of all crime that involves assault with injury⁵. There are around 89,000 referrals annually to Multi-Agency Risk Assessment Conferences (MARACs) that support victims at the highest risk of serious harm or murder across England and Wales⁶. These cases referred to MARAC cost the police almost £600m each year⁷. We estimate that for each case heard at MARAC, there are over 3 police incidents per year, including 0.8 serious violent incidents on average per case⁸.

A significant proportion of police time is taken in investigating these incidents. Yet, there is a limited coordinated effort to intervene with these perpetrators to prevent future abusive behaviour. As a result there is a high level of repeat victimisation. In line with the Policing Vision 2025 Statement 2.2⁹, there should be a shift to a more preventative model in tackling domestic abuse, realigning existing resources to deliver greater efficiency.

Based on Drive's experience, we believe that a more efficient and effective response can be achieved via the establishment of a forum, in each police force area, to coordinate a multi-agency response to high-risk, high-harm perpetrators. The precise form this forum takes should be decided at the local level, what matters is that it fulfils the following functions:

- Enables police identification of priority perpetrators using a referral criteria (such as the Recency, Frequency, Gravity assessment (RFG) or the Priority Perpetrator Identification Tool (PPIT)) and onwards referral to a multi-agency forum coordinating the response to these perpetrators;
- Is not restricted to only hearing cases identified by the police and criminal justice system, but includes cases that may be deemed to be high-risk by safeguarding agencies and processes such as MARAC or MASH;
- Works in close coordination with MARAC and local specialist victim services, so judgements about risk and response are informed by the safety of the victim and any other relevant family members;
- Provides a systematic method for multi-agency sharing of known information about high-risk high-harm perpetrators with information flowing both from and to the police. The Drive experience is that Drive intelligence gathered through a one-to-one intensive case management process adds to information held by police building a fuller picture, increasing awareness of offending profiles and often increasing risk priority and space for action from a police perspective;
- Capacity and priority placed on “disruption” work, which is work designed to prevent future abuse. For example, this could be the arrest or recall of a perpetrator for breach of restraining order or bail conditions, completing a house call and welfare checks, or placing flags on the perpetrator's vehicle. In order to disrupt perpetration of abuse, the knowledge of the perpetrator's whereabouts, activity and risk factors are absolutely crucial and the information that can be shared by the police with other agencies is key to facilitating this activity;
- Has access to, and provides a referral pathway into, the provision of intensive 1-2-1 case management which targets the most complex and hard to engage serial and repeat cases that require additional time, focus and persistence to achieve change through coordinated disruption and/or motivational and behaviour change interventions.

⁵ HMIC Progress Report on the Police Response to Domestic Abuse. November 2017. Accessible at: <https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/progress-report-on-the-police-response-to-domestic-abuse.pdf>

⁶ SafeLives MARAC data (12 months 01/10/16 to 30/09/17). Accessible at: <http://www.safelives.org.uk/practice-support/resources-marac-meetings/latest-marac-data>

⁷ Internal SafeLives research: Costing Lives Costing Money

⁸ As above

⁹ Police Vision 2025 available at: http://www.apccs.police.uk/wp-content/uploads/2013/11/6.2739_NPCC_CW_Policing-Vision_v6.pdf

Perpetrator Panel Learnings from Drive

When Drive was established, no such forum for sharing information or coordinating action around the perpetrator existed in the local pilot sites. It was challenging to align the police and other agencies' responses, and a lot of Drive time and resources were spent coordinating this activity with individual organisations on a case by case basis. The first year feasibility study of the Drive Project by Bristol University¹⁰ recognised this and concluded that there was a need for a systematic multi-agency method for identifying, monitoring and sharing information about known high-risk perpetrators in a local area, before another high-risk incident occurs.

In each Drive area, work has now been undertaken to establish a process for sharing information and coordinating this multi-agency response to perpetrators. Without national or senior level statutory leadership this process has not been easy and the pace of change has been slow, however, it is now well underway. Our findings show that it is not important whether the systematic multi-agency information sharing on perpetrators happens through a separate perpetrator-focused forum, or whether this function is fulfilled by some other existing multi-agency meeting or arrangement. However, it is important that the forum hears and responds to cases identified both by the criminal justice system, and by safeguarding routes such as the MARAC and MASH, and that it works in close coordination with these forums so that the focus on victim safety (not just potential for enforcement action) is maintained.

We have clear examples that the panel function has improved information sharing and disruption of abuse.

Case Example:

Drive in Essex has established and coordinates a DAPMAP (Domestic Abuse Perpetrator Multi-Agency Panel), which in one quarter's monitoring period, heard 26 high-risk perpetrator cases. The information shared by all agencies at this meeting lead to reassessment by the police of risk in particular cases resulting in the police prioritising and making arrests on 5 additional cases. It also created additional routes for Drive to make initial safe contact with perpetrators - resulting in Drive case managers making contact with 8 service users where contact had previously not been possible, thus enabling more intensive case work.

Perpetrator Panel Principles and Standards

Whilst the experience of Drive has shown that the exact format and structure of this multi-agency forum can and should adapt to the local context, we recognise that there is a need for nationally agreed principles and standards to guide this work, ensure quality and consistently measure impact.

National principles and standards should ensure that every area has a panel which:

- Has an overarching aim to increase the safety of victims/survivors and children by reducing the perpetration of domestic abuse through disruption, risk management and/or behaviour change interventions targeting the perpetrator;
- Keeps the safeguarding of victims/survivors and children at the core of all activity, including victim support representation at the panel;
- Is not restricted to only hearing cases identified by the police and criminal justice system, but includes cases that may be deemed to be high-risk by safeguarding agencies and processes such as MARAC or MASH;
- Identifies and assesses high-risk and high-harm perpetrators who are referred to the panel from key agencies using recognised evaluated risk and/or harm assessment tools based on information shared by partner agencies;
- Develops a multi-agency action plan to disrupt abuse and allocates actions to participating agencies;
- Holds agencies to account for completing actions;
- Tracks outcomes and ensures an appropriate multi-agency response to ongoing changes in the risk/harm posed by the perpetrator by monitoring and re-hearing cases 'held' by the panel;

¹⁰ <http://driveproject.org.uk/wp-content/uploads/2017/11/Evaluation-of-the-Drive-Project-Year-1-Feasibility-Study.pdf>

- Has a mechanism for referring cases to required additional and targeted intervention support, such as intensive 1-2-1 case-management for disruption or behaviour change provision;
- Develops data collection of high-risk high-harm perpetrators of domestic abuse to inform the local strategic response to domestic abuse;
- Enables cases to be closed by passing them to another local agency who can monitor the case and bring it back to the forum if circumstances change or require it.

Case Study: Impact of Perpetrator Panel on Increasing Victim Safety

A case was referred to Drive where the perpetrator had spent over two decades abusing his partner. Despite separating a number of years ago, the abuse continued. The perpetrator recently made threats to kill the victim, raped her, stole money from her and forced her to take drugs. As a result of the abuse she can no longer work due to the stress. The perpetrator colludes with one of their children in the abuse, claiming the victim is imagining what is happening. As a result, she hasn't felt able to support a Police prosecution.

The IDVA service had not been able to engage with the victim, however through joint working with Drive, and meeting the victim together to explain that Drive could coordinate action to disrupt the perpetrator's behaviour, engagement with the victim was built.

Additionally, Drive brought the case to the multi-agency perpetrator meeting to raise the concerns over the threats to kill the victim. The joint presentation of risk and proposed actions by the IDVA and Drive Case Manager successfully raised the priority of the case among agencies. Our experience is that across agencies with different priorities of risk, two services coming together with a shared assessment of risk like this can effectively galvanise a more coordinated multi-agency response.

As a result of this meeting, the police are now aware of the risk and have put safeguards in place. She has been granted a non-molestation order that is aimed at preventing the perpetrator from threatening violence or harassing her. She also has CCTV and a life-line alarm installed in her home, increasing her safety. The police also shared information on his new partner at the multi-agency meeting and are now exploring opportunities to make a Domestic Violence Disclosure to her.

1.3 Need for quality assured one-to-one interventions with high-harm complex needs perpetrators, whose complex needs and engagement profiles are different from those suitable for more long-established structured group work programmes

Through Drive we have gathered data enabling us to understand for the first time the complex needs and offending history of the high-harm perpetrators whose victim's cases are heard at MARAC. Their high level of complex needs, previous offending history and resistance to engagement make this a distinct cohort from other perpetrator groups, for example, those who present at DVPPs. Through this work we are building a picture of the diverse cohorts of perpetrators with different risk profiles, different levels of resistance to change, different levels of need, and different levels of harm being caused. Each of these cohorts requires specific and tailored interventions to effectively reduce the perpetration of abuse through disruption and/or behaviour change.

Case Study: Complex needs of high-risk perpetrators

Based on the current data available from Drive*, 60% of the perpetrators worked with have at least three complex needs, including 37% with a drug or alcohol addiction and 45% with a mental health need¹¹), and previous offending history (47% have previous arrests for Domestic Violence¹² and more than half have previous criminal offences¹³) and are often therefore difficult to engage. Their

¹¹ Drive Project Data, Service User Demographics, 24 months to end of Year 2 Quarter 4, closed cases where contact was made (based on 107 service user cases)

¹² Drive Project Data, Service User Demographics, 24 months to end of Year 2 Quarter 4 (based on 526 service user cases)

¹³ University of Bristol Drive Project Year 1 Feasibility Study. Accessible at: <http://driveproject.org.uk/wp-content/uploads/2017/11/Evaluation-of-the-Drive-Project-Year-1-Feasibility-Study.pdf>

high level of complex needs, previous offending history and resistance to engagement make this a distinct cohort from other perpetrator groups, for example, those who present at DVPPs.

**This is internal Drive data, due to be analysed externally by the University of Bristol with findings available in September 2018.*

In relation to high-harm perpetrators, the experience of Drive identifies a need for one-to-one interventions delivered by highly skilled case managers who can balance challenging perpetrator behaviour with motivating engagement and behaviour change.

This one-to-one activity reaches perpetrators who otherwise receive no sustained oversight, intervention or challenge in relation to their domestic abuse behavior, even when they might be receiving intervention in relation to other issues such as substance misuse or non-DV related offending. Intensive one-to-one case management targets both cases requiring the intensive co-ordination of disrupt and risk management interventions as well as complex cases with the potential for engagement and behaviour change. It requires:

- The differentiation of perpetrator cohorts with a matching of interventions to individual needs in accordance with the risk and typology of abuse (an area that still lacks sufficient research);
- Co-ordinating multi-agency collaboration and intervention planning that reflects complex needs such as substance misuse, mental health, homelessness, non-DV offending and involves high levels of information sharing, particularly with the IDVA and MARAC;
- Intervention plans which are matched to assessments of individual typology of abuse, need and risk and which draw from a range of disruption and behaviour change approaches appropriate for a complex needs cohort;
- Recognising when, and understanding how, to use a complex combination of supportive, disruptive and change interventions with the same individual within the same intervention plan;
- High quality clinical supervision and systematic quality assurance oversight of one-to-one case management and intervention practices taking places between a case manager and a complex need high-harm perpetrator to ensure effective minimisation of the risk of collusion and vicarious trauma.

Engagement and behaviour change work requires:

- Focus on challenging and addressing denial and minimisation, which is matched to a range of suitable interventions to address these attitudes and behaviours;
- Focus on building a relationship with and engagement from the perpetrator, which can often involve addressing immediate support needs (such as housing or employment) to remove barriers to behaviour change;
- Building motivation for change through motivational interviewing techniques that can include exploring vulnerability and adverse childhood experiences to raise awareness of how that might contribute to current patterns of behaviour and help build empathy for the impact of current behaviour on children;
- Consideration of mental health needs/diagnosis and the impact of this on the efficacy of different interventions and approaches;
- Consideration of medical issues particularly in relation to brain injury, learning disability or mental health medications;
- Use of a range of behaviour change techniques tailored to the individual profile and stage of change drawing from a tool box that includes interventions relating to power and control, trauma informed, strength based, identity, impulse control and emotional regulation approaches;
- Coordinating methods to sustain change: multi-agency oversight combining disruption, risk management and motivational strength-based interventions.

Intensive disruption case management planning requires:

- A system wide approach to dealing with the highest-harm perpetrators which includes cross-agency workforce development to raise awareness of the issues and roles required from each agency in responding;

- Case manager/practitioner training and a skill set with strengths in intelligence gathering and multi-agency information sharing and collaboration;
- Commitment to creative thinking and problem solving to find individual solutions and approaches to individual cases;
- Dedicated time to focus the spotlight on a specific case to enable intensive intelligence gathering and planning disruption intervention recommendations.

The University of Bristol found that Drive one-to-one case workers are in a unique position to challenge the perpetrator and also encourage behaviour change through 1) high levels of information sharing, especially via the IDVA and MARAC, 2) persistence on the part of the case managers, combined with the length of the intervention¹⁴. Their work requires nuance and skill to balance engaging service users with a desire for support, explore vulnerability and at the same time to challenge problematic attitudes and beliefs. Disruption, denial focused work, risk management, engagement and motivation interventions all work in combination to create moments and opportunities to create cognitive dissonance and opportunities for motivating behaviour change that looks different from a structured behaviour change intervention.

Work with this cohort who are resistant to change is new and innovative, and Drive case workers have been developing a suite of materials, drawing on Respect approved one-to-one behaviour change programmes. Drive is currently in the process of consolidating and refining this material into a manual that meets Respect standards and can be used as a best practice tool to deliver one-to-one behaviour change work with this cohort.

Drive's experience is that this work can be successfully carried out in prison with offenders in custody for less than 12 months. This might be to begin an intervention that can then continue outside the prison gates, but it also has the potential to effectively disrupt ongoing coercion and control being carried out whilst the perpetrator is remanded in custody.

Case Study: Intensive Case Management Increasing Opportunities for Disruption

Drive was assigned a violent and serial perpetrator with live restraining orders in place against multiple previous partners, including the victim whose case was heard at MARAC. The perpetrator had already committed high levels of physical and emotional violence against the victim (who was pregnant), but was continuing to intimidate and abuse the victim while on remand in prison, making specific threats against her and her family. As a result of the continuing threats, the victim alerted the IDVA that she was continuing to be intimidated, even though the perpetrator was on remand.

The perpetrator had complex needs including mental health issues, and previous weapons and firearms offences. Drive determined that it would not be safe to make contact with the service user, or reveal any indications that information on the ongoing threats had been revealed by the victim. Therefore Drive undertook high level and intensive partnership working with the Offender Manager in prison and security team to alert them that the perpetrator had access to a mobile phone, and jointly agree an intervention. The Drive case manager expressed the need for "random" cell searches so that it would not seem to be information lead. As a result, the security team conducted cell searches in multiple cells in the area, including the cell of the perpetrator.

As a result of the intensive case work:

- The trial was halted in relation to the assault on victim due to the intimidation
- The perpetrator's cell was searched and three SIM cards and drugs were found
- Additional charges were brought against perpetrator
- The subsequent trial resulted in a longer sentence

¹⁴ University of Bristol Drive Project Year 1 Feasibility Study. Accessible at: <http://driveproject.org.uk/wp-content/uploads/2017/11/Evaluation-of-the-Drive-Project-Year-1-Feasibility-Study.pdf>

Case Study: One-to-one behaviour change work (1)

Drive was assigned a perpetrator who had been in a relationship with the victim (his current partner) for many years. They had two children together. The case was referred to MARAC because the perpetrator had physically assaulted the victim by punching her in the face. He was also using significant emotional abuse, constantly checking up on the victim, questioning his children around their mother's activities and policing her activity on social media. He was very jealous and possessive and became physically abusive when other men liked her social media pages. His high levels of denial and lack of motivation to change meant that a DVPP would not be appropriate. The children had a Child Protection Plan in place.

The Drive case manager arranged to meet the perpetrator before the first child protection conference to introduce himself, explain what would happen, and set his expectations about how his actions would be discussed. This was in order to reduce the risk of the perpetrator becoming verbally challenging in the conference, sabotaging the meeting and then becoming physically abusive to the victim after the meeting. Throughout the next few months, the case manager built his trust and completed one-to-one work with him, focusing on his minimisation of the abuse but also exploring his vulnerabilities.

The case manager drew on the perpetrator's experiences of his parents' abusive relationship to explore cycles of abuse and ACEs, and explain how his behaviour could have a lasting impact on his children. The perpetrator was profoundly impacted by the case manager explaining that his children were exhibiting symptoms of the abuse at school, falling asleep and being aggressive. The case manager did work with the perpetrator on his negative thought patterns and catastrophising, giving him coping strategies and looking at alternatives to abusive behaviour, such as "feeding the good dog".

The case manager also worked behind the scenes with the IDVA to ensure the victim's safety was prioritised, including making arrangements for their Child Protection plan to be appropriately updated when the family were planning to go on holiday. The Drive case manager also referred the children into a therapeutic support group for children who have witnessed domestic abuse.

As a result of the one-to-one work delivered by Drive over a sustained period of time, there was a marked change in his behaviour and outlook, and no further reported incidents. The children were removed from their child protection plan after 9 months of Drive involvement with Children's Services saying: *"I am of the view that [Drive]'s involvement has been pivotal in the positive changes made with the family"*.

Case Study: One-to-one behaviour change work (2)

Drive was assigned another perpetrator who, despite being separated, was still exercising coercive control over the victim by making his children call the victim, harassing her over the phone, and making the children ask questions that placed blame on her for causing their separation. The victim recorded these phone calls and shared them with the police via the IDVA.

The Drive Case Manager underwent a series of motivation to change actions with the Service User, who began to show remorse for their actions and made progress towards changing their attitude and behaviour, but still minimised the extent to which he was abusive over the phone. This minimisation meant that a DVPP would not be suitable for the perpetrator. The Case Manager therefore discussed playing recordings back to the Service User with the IDVA and the police, which was agreed to by the victim. The Case Manager made an edited version to play back to the Service User which only included his own comments and highlighted the children's discomfort.

The Service User was greatly impacted by hearing the recording. It consolidated the behaviour change work that had taken place to date and no abusive behaviour has taken place since.

1.4. Need for quality assured structured group work programmes

There is a need to ensure that all work with perpetrators, regardless of whether it is delivered by statutory or voluntary organisations, is safe and prioritises the wellbeing of survivors. With regards to interventions with perpetrator cohorts suitable for group work interventions, we would like to see a commitment to provide high-quality, Respect-accredited perpetrator programmes as part of a refreshed National Statement of Expectations.

In addition, the Respect standards provide guidelines to ensure that work with perpetrators is safe and effective and that it does not inadvertently contribute to the harm already experienced by survivors. These standards are aimed at specialist service provision, but can be applied to voluntary, public and private sector work with perpetrators. We would advocate that there is quality assurance of all perpetrator work in accordance with these standards.

Commissioners should have a responsibility for ensuring any perpetrator programmes they commission are safe, effective and do not inadvertently contribute to the harm already experienced by survivors and their children. We therefore propose that the DVA Commissioner should be given responsibilities for monitoring the implementation of the National Statement of Expectations by statutory commissioners.

A good perpetrator response needs:

- To be linked to appropriate victim services.
- Flexibility in terms of time to meet the needs of the perpetrator;
- Multi-agency involvement in identifying risk, action planning, monitoring engagement and any behavioural change;
- To offer support and challenge as appropriate in groups and individually.

Within this framework we would like to see greater encouragement of provision for perpetrators so that there are far greater opportunities for perpetrators to receive interventions whether they self-refer to services, or are referred by statutory services or family and friends. At present fewer than 1% of perpetrators receive an intervention¹⁵ and there are huge gaps in perpetrator provision across the country. It is right that the consultation emphasises the need for early intervention and this must apply to perpetrators of abuse as much as victims of the abuse. At the moment most perpetrator support is only available after conviction for an offence – when crisis point has been reached. There must be more emphasis on ensuring perpetrators are offered an intervention before their behaviour has escalated.

The proposed Domestic Abuse Protection Orders which will include positive requirements to attend perpetrator programmes represent a significant step forward and could provide the impetus for greater provision of such programmes. We would caution, however, that such programmes meet the quality framework outlined above to ensure that the most effective interventions are available locally.

There is also a need to create a response that works for all domestic violence and abuse permutations, including for example LGBT+ relationships, those in honour based violence (HBV) and other situations in which there are multiple perpetrators, and situations in which the couple haven't separated. This response needs to recognize that within same sex relationships or when family members are colluding, patterns of power and control might present differently. SafeLives SpotLights¹⁶ are a good resource for considering these other dynamics. For example, we welcome the recognition that perpetrators with alcohol or drug misuse problems need interventions to address domestic abuse that also take account of substance misuse issues and interplay with patterns of abuse, while recognising that substance misuse is never the cause of or an excuse for domestic abuse.

1.5 Improve the police response to perpetrators to maximise the rigorous and consistent use of existing civil powers such as DVPOs/DVPNs, as well as the proposed new Domestic Abuse Protection Order

The police currently have a range of existing statutory levers available to disrupt abuse, such as Domestic Violence Protection Orders (DVPOs), Domestic Violence Protection Notices (DVPNs) and the Domestic Violence Disclosure Scheme (also known as Clare's Law).

¹⁵ Please see Respect DVPP Commissioning Guidance for Police and Crime Commissioners 2013. There are around 3,500 spaces on Perpetrator Programmes, compared to an estimated 400,000 potential perpetrators of chronic partner abuse (<1%). Accessible at: <http://www.senedd.assembly.wales/documents/s30732/GBV%2090b%20-%20Respect.pdf>

¹⁶ Spotlights reports are available at: <http://www.safelives.org.uk/knowledge-hub/spotlights>

We believe that these tools provide valuable opportunities to disrupt and reduce the scope for perpetrators to abuse victims. We therefore welcome the proposed legislative introduction of a Domestic Abuse Protection Order, and extending its application to cases involving abuse other than violence or the threat of violence. However, we would also like to recommend a number of important changes to ensure that is effective in practice:

Facilitating improvements in the use of domestic abuse orders:

In relation to the existing levers available to disrupt abuse, Drive has found that there is considerable scope for greater and more consistent use.

Drive has found that, where used consistently with breaches followed up, these levers can have a powerful impact in disrupting abuse.

Case Example:

Drive worked with a perpetrator exhibiting high levels of coercive and controlling behaviour who was assigned a DVPO prohibiting him from spending time at the victim's address for 28 days. Due to the DVPO, Drive knew that it would be safe to contact the perpetrator as they should not be at the victim's address. During this period, Drive worked with the perpetrator to help him accept that the relationship was over and prevent his return to the victim once the DVPO expired.

However, we also know that police forces currently do not currently use these powers consistently¹⁷.

- The prevalence of the use of these powers used varies greatly across areas. The number of DVPOs granted by the courts in the 12 months to June 2017 ranged from 11 in Gwent to 477 in Merseyside. 5 forces alone were responsible for almost 40% of all the DVPOs granted in the previous year.
- The use of these powers in relation to the number of recorded domestic abuse offences¹⁸ varies greatly. In one force, the number of DVPOs granted in 2017 represented approximately 4% of all cases of recorded domestic abuse offences. Another force, with a very similar number of recorded domestic abuse offences, granted only 17 DVPOs, equating to 0.1% of all DA offences. Suffolk made 291 Right to Know disclosures during the year, compared to 1 in Bedfordshire: despite both forces having very similar numbers of domestic abuse related offences recorded during the year.
- There is inconsistency in the number of DVPOs and DVPOs recorded as being breached, with 39 DVPOs in North Wales breached compared to 88 granted (44%), but only 7 breaches compared to 68 DVPOs granted in Hertfordshire (10%).
- Finally, there is also a lack of consistency in the proportion of Right to Ask applications that are approved between forces, which ranges from 76% to 7%: with one area making 140 disclosures, compared to 2 in another force.

This picture is reflected in Drive areas, where there is inconsistency over 1) how often and in what circumstances orders are issued and 2) whether action is taken to follow up on breaches - with a failure to follow up limiting effectiveness.

Case Example:

Drive was assigned a case where the perpetrator, who was on bail for serious violence against the victim, had both a DVPO and DVPO in place to protect the victim. Drive was aware that the perpetrator was not staying at his bail address and was visiting the victim's address – both actions were in breach of his bail conditions. Drive notified the police; who attended the victim's address and found the perpetrator hiding there. However, no follow up actions were taken by the police, despite this being a breach of bail, enabling the perpetrator to continue to abuse the victim.

The effective use of these tools depends on the strength of the multi-agency working and systems surrounding disruption within the area and resources/capacity within the local force to systematically

¹⁷ Data taken from ONS Domestic Abuse in England and Wales Appendix Tables, available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/domesticabuseinenglandandwalesappendixtables>

¹⁸ According to police recorded crime data for the Year ending March 2017, available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/domesticabuseinenglandandwalesdatatool>

respond, rather than relying on the interest and commitment of individual officers. The Northumbria OPCC has noted that the use of such levers was historically low in the Northumbria area, but increased significantly with the introduction of the MATAC domestic abuse perpetrator panel model which increased the awareness and use of these statutory levers. Findings from Drive suggest that greater training and consistency across forces is required to maximise the potential of the above statutory levers to disrupt abuse, which can be highly effective when implemented with necessary resources. Importantly, this training and consistency needs to be backed up by effective systemic processes and sufficient resources to enable forces to act on breaches and enforce orders. This is about improving the quality of implementation of powers that are available, it might not mean that there is a systematic rise in the number of times orders are issued. The criteria for success is effective and sustainable impact on victim safety, not volume.

We therefore welcome the creation of the proposed Domestic Abuse Protection Order (DAPO), and extending its application to cases involving abuse other than violence or the threat of violence. However as outlined above, there needs to be force-wide training in the purpose and use of this lever, with sufficient resources dedicated to following up on any breaches of the order, in order to maximise its potential. For this reason, Drive also would express caution around directing additional resources towards acquiring new technology to monitor or tag perpetrators, which requires significant police resources in order to be implemented effectively. We would instead advocate for greater training, oversight and more effective use of existing powers as well as the proposed DAPO.

Our experience suggests that the effective use and oversight of these tools is increased by establishing local perpetrator-focused multi-agency fora to work alongside the MARAC providing a system and processes through which to coordinate a multi-agency response to disrupt perpetrators' abuse before another high-risk incident can occur and monitor their behaviour over time. Please see Section 1.2 above for further information on perpetrator panels. Additionally, Drive is currently carrying out a benchmarking exercise to measure the current use of existing civil orders in new Drive areas with the intention of tracking use during and after the establishment of new multi-agency perpetrator panels, to see if the Northumbria experience is replicated.

There is also a role for HMICFRS to scrutinise the response to perpetrators. This should not be limited to arrest and prosecution rates, but also involve inspecting police and probation involvement in multi-agency disruption work, and the outcomes being achieved by this.

All of the work outlined above requires police capacity and resources to be delivered effectively. Given the high proportion of violent crime currently due to domestic abuse (30% of all crime that involves assault with injury¹⁹), and the high levels or repeat cases, we believe that by investing in preventing and proactively responding to domestic abuse perpetrators, police time and resources can be used more efficiently.

Recognising the risks associated with including Victims and IDVAs as potential DAPO applicants, and removing this scope:

We recognise that the inclusion of victims and IDVAs as applicants for DAPO's contains the potential to increase scope for victim and IDVA action against the perpetrator. However, on balance, we believe that this potential is outweighed by the risks that this places undue expectation and responsibility on victims and IDVAs to act and take responsibility for perpetrator behaviour in a way that removes responsibility from police. We believe that enforcement lead activity rightly rests with the police. Otherwise, this risks contributing to the perpetuation of a low and inconsistent use of these powers with a lack of commitment to applying police resources to follow up and take action on breaches. We therefore recommend that victims and IDVAs are not included as eligible applicants for the issuing of DAPOs.

2. Better data collection and information sharing

2.1 Need for a robust national perpetrator dataset and independent analysis of that data on a regular basis

¹⁹ HMIC Progress Report on the Police Response to Domestic Abuse. November 2017. Accessible at: <https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/progress-report-on-the-police-response-to-domestic-abuse.pdf>

One of the aims of Drive at its inception was to collect a data set on perpetrators linked to MARAC cases. Our findings, which are reinforced by the University of Bristol evaluation, are that there is a lack of information within the system on the perpetrator at the point of MARAC. The work that was required to piece together information on these perpetrators was incredibly challenging and time consuming, and has highlighted a clear gap in the amount that is known about these perpetrators who are causing significant harm and risk. Through the work carried out on Drive, we have been able to build a core data set (including basic demographic information, such as age and gender) for around 1,500 perpetrators whose victims are referred to MARAC. This in itself was challenging, and does not contain robust information on the needs of these perpetrators due to gaps in the data available. However, for the perpetrators assigned to the Drive intervention, case managers have been able to find additional information on the perpetrators' needs and offending profile: 60% have at least three complex needs, including 37% with a drug or alcohol addiction and 45% with a mental health need²⁰, and previous offending history (47% have previous arrests for Domestic Violence²¹ and more than half have previous criminal offences²²).

This lack of research and data currently available on high-risk perpetrators (outside of interventions such as Drive) is a critical gap for the following reasons:

- **Individual intervention and safety planning:**
 - Understanding the needs of perpetrators and their offending behaviour (including instances of coercive and controlling behaviour, which is a significant predictor of serious harm or fatality) is crucial for effective intervention and safety planning in each individual case;
 - At the same time, research has shown that attitude change, motivation and engagement are significant factors in determining behaviour change. Drive has captured these indicators through its work with service users, however there is no data currently available for high-risk perpetrators who are not assigned to Drive. Through the Drive pilot we have tested and designed attitude assessments that can now be used nationally with a wider cohort to understand more fully, across a broader range of risk levels, the role that attitudes like cognitive distortion, responsibility, impact on other/s, gender views, have on recidivism.
- **Effective strategic commissioning:**
 - Understanding the complex needs of perpetrators is required to build a clear picture of the resources and provision that will be required to address these needs and remove barriers (such as drug and alcohol addiction, lack of suitable housing, or mental health issues) to their offending behaviour;
 - In addition, there are currently no nationally recognised or established prevalence measures for perpetrators. The work that Drive has undertaken to capture a core dataset on high-risk perpetrators is being used to develop a robust method for calculating the prevalence of perpetrators across the UK, which can then assist local commissioners with making informed decisions around the level of support and services required.

Through the MARAC core dataset and our Drive dataset, we are starting to build a clearer understanding of the profile of domestic abuse. Through the MARAC core dataset we have learnt about the number of children that are associated with the number of perpetrators. Similarly, through the SafeLives Insights dataset we have a greater understanding of the number of children and young people who, having been exposed to domestic abuse as a child then go on to demonstrate harmful behaviours towards others (25% - Children's Insights national dataset²³). To gain a clearer understanding of the risks to children and young people and to learn how perpetrator projects can contribute to early intervention there is a need to capture data on the childhood experiences of high-risk perpetrators (e.g. ACEs). SafeLives Insights is beginning to do this, but it is still in its early stages.

²⁰ Drive Project Data, Service User Demographics, 24 months to end of Year 2 Quarter 4, closed cases where contact was made (based on 107 service user cases)

²¹ Drive Project Data, Service User Demographics, 24 months to end of Year 2 Quarter 4 (based on 526 service user cases)

²² University of Bristol Drive Project Year 1 Feasibility Study. Accessible at: <http://driveproject.org.uk/wp-content/uploads/2017/11/Evaluation-of-the-Drive-Project-Year-1-Feasibility-Study.pdf>

²³ SafeLives In Plain Sight - report available at:

<http://www.safelives.org.uk/sites/default/files/resources/Final%20policy%20report%20In%20plain%20sight%20-%20effective%20help%20for%20children%20exposed%20to%20domestic%20abuse.pdf>

The establishment of perpetrator panels is one response Drive is taking to improve information gathering around perpetrators and we recommend that both MARAC and the establishment of perpetrator panels is aligned to a national collection process and core data set on perpetrators.

2.2 Need to be able to track high-risk perpetrators cross border

Despite the existence of Clare's Law (the Domestic Violence Disclosure Scheme)²⁴, Case Managers interviewed by the University of Bristol noted that Services Users who changed areas were a challenge because they disappeared from services. Our recommendation to establish a national network of multi-agency perpetrator panels has the potential to provide the infrastructure to further develop much needed cross-board information sharing processes and protocols, particularly with regards to understanding whether a case involving the perpetrator case has previously been heard in another area.

The proposed Domestic Abuse Protection Order could also help to avoid this in some cases where perpetrators are required to inform the police of a change of address, a new partner, or where/if electronic tagging is introduced. Even with this scheme, however, there needs to be a greater focus on information sharing about high-risk domestic abuse perpetrators who move from one area to another.

Other potential options which could be considered include 1) Introducing an automatic right to apply Clare's law to high risk high harm domestic abuse perpetrators through Risk to Know rather than Right to Ask, which puts the onus on individuals rather than agencies or 2) automatic right to request previous domestic abuse related histories on all perpetrators who are identified to the Police whatever the risk level 3) a register of perpetrators (for information sharing purposes within the Police National Database) rather than as proposed to be part of VISOR (Paladin's proposals). We favour improved use of existing systems, especially PNC. Improvement will require i) leadership ii) training iii) appropriate feedback loops on gains made from better use of the system iv) better multi-agency focus on perpetrators, leading to better information and data sharing.

3. Oversight, scrutiny and quality assurance

3.1 DA Commissioner to cover perpetrators of DA, as well as victims/survivors

We support the appointment of a DA Commissioner as long as the role has the authority, independence and resources to hold statutory agencies, the Government and local commissioners and service providers to account. We would like to see the following as part of the Commissioner role:

- A remit which covers not just adult victims/survivors of domestic abuse, but also children experiencing domestic abuse as they grow up, and young people in abusive relationships.
- We also would like to see the Commissioner have oversight of all levels of perpetrator provision – both by statutory, voluntary and private sector providers, to ensure it meets national standards and that gaps in provision are identified.
- In particular, we would like to see the commissioner provide oversight and accountability on the following recommendations for changing perpetrator behaviour which we outline above:
 - Ensuring that standards are in place around multi-agency perpetrator work, including perpetrator forums, and that these standards are met;
 - Strategic leadership to ensure ongoing learning on what works for driving behaviour change in different perpetrator cohorts, including ensuring data is gathered and best practise consolidated to create a cross-sector response;
 - Ensuring quality in terms of the provision of services for domestic abuse perpetrators across the cohort of perpetrators;
 - Oversight on the use and efficacy of statutory levers, such as DVPOs, DVPNs, Clare's Law (DVDS) as well as the new DAPOs, in order to provide transparency in this area.

In addition, we would like to see the following:

- A remit that focuses on Domestic Abuse, but which recognises and responds to the strong links between DA and other areas of risk, both those considered under the term 'VAWG' and also other forms of risk and disadvantage, such as mental ill-health and exposure to other forms of criminality such as Child Sexual Exploitation (CSE) and Child Sexual Abuse (CSA) wider

²⁴ <https://www.gov.uk/government/publications/domestic-violence-disclosure-scheme-pilot-guidance>

violence against women and girls. It is confusing that the Home Office acknowledges the indivisible ties between all forms of VAWG through its 2016 strategy, but that the Commissioner will only be able to focus on domestic abuse. We also think it is vital that onward links are acknowledged; the co-relation between mental ill-health and domestic abuse is evident in all good quality studies of the issue. We support the push to ensure local authorities and commissioners jointly agree VAWG strategies for local areas, carrying out needs assessments across different forms of VAWG and other intersecting issues, rather than segmenting strategies, and if the DA Commissioner is to make a difference, it sends a backwards signal for them to focus solely on domestic abuse. We suggest that while the title of this role should remain 'DA Commissioner' to give sufficient focus, they are given responsibility for monitoring local Commissioners' performance against the refreshed VAWG Strategy, as well as the National Statement of Expectations for the Home Office, and Ministry of Housing, Communities and Local Government (MHCLG) commissioner priorities for domestic abuse. We also feel the person holding this post should attend the cross-Whitehall Directors Group on prevention of social harms.

- Appointment of the Commissioner by Parliamentary Committee – potentially by a joint committee of Women and Equalities and Home Affairs if committee time allows. It is important that the Commissioner feels accountable to Parliament rather than to the Government so that they are independent and able to exercise their role without fear or favour.
- The right resources and staff to fulfil the role. The numbers of domestic abuse victims sits just under 2 million a year which is significantly higher than the number of trafficking victims, and yet the budget proposed for the Commissioner role is not proportionate to that of the Modern Slavery Commissioner. We would suggest that the budget needs to be increased to reflect the prevalence of domestic abuse in society (let alone the prevalence of other forms of violence against women and girls such as sexual abuse which are closely linked).

3.2 Ensure that there is a national approach to quality assurance, workforce development, data collection, innovation and sharing best practice

We are encouraged by the desire to increase the response to perpetrators and recognise that to successfully achieve this step change in the national approach, funding, workforce development and quality assurance models will require consideration. Importantly, there needs to be consideration given as to how to ensure that perpetrator work is safe and effective and doesn't inadvertently contribute towards the harm already experienced by survivors. We believe that the creation of a Domestic Abuse Commissioner provides the opportunity to harness the oversight of a scaled up national approach to perpetrators of domestic abuse. To complement the strategic role of the DA commissioner, and to ensure that these ambitions are delivered, we believe there should also be national operational leadership to deliver:

- I. Accredited training and workforce development (for specialist workers delivering perpetrator services as proposed above, and upskilling staff in universal services);
- II. Quality assurance of voluntary and statutory perpetrator interventions including perpetrator panels;
- III. Overseeing national perpetrator data collection and analysis;
- IV. Gathering and sharing best practice, including overseeing approaches for different cohorts by level of risk, harm and relationship;
- V. Fostering of innovation.

3.3 A collaborative review of commissioning, aimed at developing a national system of sustainable long-term commissioning and funding models

As noted above, we recognise that to successfully achieve a step change in the national approach to targeting perpetrators of domestic abuse consideration must be given to the implications for resourcing, with a move away from inconsistent and short term funding towards a more systematic, longer term sustained approach underpinned by core statutory support. We would therefore welcome a collaborative review of commissioning models with PCCs, Local Authorities, Home Office and other central government departments. This review would seek to develop funding approaches that would foster and support system wide activities required for ensuring safe and effective perpetrator work.

4. The wider context: victims, children and a whole family approach

There is a vital need to connect all of this perpetrator targeted work with the response to other family members experiencing abuse, from women as victims/survivors and mums, to children growing up in homes where domestic violence and abuse is taking place, to young people at risk of being harmed or harming, to older people who may be the subject of abuse by their (young or adult) children. The response to perpetrators must not sit in isolation from the experiences of these other family members, a whole family approach is essential.

We know that one in five children have been exposed to domestic abuse.²⁵ SafeLives estimates that around 130,000 children in the UK live in households with high-risk domestic abuse; that is, where there is a significant risk of harm or death.²⁶ SafeLives' latest Children's Insights dataset has found that at the time they start school, at least one child in every class will have been living with domestic abuse since they were born.²⁷ For some children, this exposure to abuse does not only start early, but persists into later childhood. Of all the children in the Insights dataset who had been living with abuse for their whole lives, over a third (37%) were more than five years old.

We are missing opportunities to provide advice, support, information and safety planning. We are failing some of the most vulnerable people and families. We want support for all members of the family, whoever they are, wherever they are, and whatever their circumstances. We know that risk increases when an abusive relationship ends, meaning that working with victims of abuse and their children before they leave, and holding perpetrators to account while offering opportunities to change, is vital to their safety and wellbeing.

As part of the SafeLives' Beacon Site approach, including earlier and easier access to support via the One Front Door approach, and the Drive pilot for high risk perpetrators, the intervention they have developed will provide a response to meet the needs of people who wish to remain in their relationship. A critical element of this response is a multi-agency approach that requires a shift in systems and culture by all agencies involved in offering support and keeping adults and children safe.

SafeLives (2017) found over three-quarters of practitioners said it was 'very common' or 'common' for victims and perpetrators they are working with to state they want to stay in the relationship.²⁸ Many practitioners believe by working with couples or families who wish to stay together you can bring about positive change by moving the clients through the 'stages of change' enabling informed choices while keeping an 'eye on the family' and the client safe as well as addressing the perpetrators behaviour.

SafeLives Insights dataset²⁹ shows that clients who were still living together have a different profile that those who were no longer in the relationship. In particular they were more likely to be older, more likely to have a disability and be struggling to pay for essentials. Additionally clients were twice as likely to be from a black and minority ethnic (B&ME) background.

Drive's experience of working intensively to address a complex range of risk and need in relation to the perpetrator only serves to accentuate what we already know about the pressing need to also address the complex range of need that victims and children experience beyond immediate safety planning. The pressing need for ongoing therapeutic interventions for children experiencing domestic abuse is particularly stark.

²⁵ <https://www.nspcc.org.uk/services-and-resources/research-and-resources/pre-2013/child-abuse-and-neglect-in-the-uk-today/>

²⁶ <http://www.safelives.org.uk/sites/default/files/resources/Final%20policy%20report%20In%20plain%20sight%20-%20effective%20help%20for%20children%20exposed%20to%20domestic%20abuse.pdf>

²⁷ <http://www.safelives.org.uk/insights-national-briefing-children>

²⁸ A survey carried out by SafeLives with 113 practitioners across agencies in May 2017 about their attitudes and experiences of working with couples where there is IPV who want to remain in the relationship

²⁹ SafeLives. Insights National dataset (12 months to October 2016). SafeLives: Bristol