

Gender-Based Violence Strategy

Response to Public Consultation

September 2021

The Public Consultation

GMCA launched a public consultation in respect of its Gender-Based Violence Strategy on 22nd June. The consultation consisted of a questionnaire asking questions in respect of each chapter, and closed on 1st August. The questionnaire was complemented by a number of focus groups and one-to-one interviews with victims and survivors of gender-based violence. 150 responses to the on-line questionnaire were received. Detailed below are various results and themes from the consultation and our response.

The consultation followed on from a general call for feedback earlier in the year, which led to 68 responses, some of those being extremely detailed. Amendments based on that initial feedback were incorporated into the draft released for public consultation and were detailed in the preamble.

The Gender-Based Violence Board, responsible for overall delivery of the strategy, will be provided with a comprehensive report of the consultation responses. This will ensure that where insights have not necessarily influenced amendments to the strategy they are utilised when developing detailed delivery plans.

Title and Definition

In the accompanying information with the questionnaire and focus groups, we outlined how and why we arrived at the title and definition for our strategy. We then asked some specific questions in that respect, which resulted in responses that can be summarised as:

- 75% of respondents agreed with the title and definition.
- All of the focus groups agreed with the title and definition.

Violence

Several responses questioned the use of the word violence rather than abuse or harm as they felt that violence did not incorporate the experiences that women face which aren't necessarily physical violence, such as inappropriate comments or touching, psychological abuse and other 'lower-level' acts which are still harmful. They argued that violence has too strong a connection to something physical and did not incorporate the emotional impact. This was also commented upon by some of the focus groups.

More inclusivity

There were also a large number of responses which wanted the definition to be more inclusive by specifically including trans and non-binary victims within the definition to recognise the fact that they are also at risk of gender-based violence because of their gender identity. This was again mentioned in some of the focus groups and by some victims and survivors. Another suggested addition to the definition from victims and survivors of gender-based violence that were interviewed, was around misuse of religion where perpetrators use the victim's own religion to control or influence their behaviour.

Online abuse

Some respondents felt that the definition was missing online abuse and harm. This included the sharing of images without consent, online exploitation, and inappropriate comments on social media. Although online harm was mentioned in the strategy a few times, respondents felt that this was not sufficient and that online harm was particularly significant. Each one of the focus groups picked up on this and felt that it should play a larger role within the definition and the strategy as they felt that online harms were becoming worse and more prevalent.

Male victims

Some responses wanted a stronger mention of male victims of domestic abuse within the definition and felt that the strategy had a role in challenging the idea that men can't be victims of domestic abuse and should encourage them to identify as victims. Victims of gender-based violence that took part in interviews felt that it was good that men and boys were included in the definition but that the focus on women and girls was correct.

Given that there are varying viewpoints in respect of this issue, we believe we have the balance right in our strategy. We recognise and state that men and boys can be victims of gender-based violence. But we also recognise and state that by far the most prevalent issue in respect of gender-based violence is violence against women and girls, which is in the main perpetrated by men and boys. Our strategy heavily focuses on violence against women and girls, though male victims and survivors will benefit from many, if not all of the commitments made. Recognising the distinct needs of male victims and survivors, we have already committed to develop a bespoke sub-plan under the oversight of the Gender-Based Violence Board.

Sex or gender

A proportion of responses wanted this strategy to use the term 'sex-based violence' rather than 'gender-based violence.' They felt that it was a person's biological sex rather than their gender that put them at risk of violence.

We were clear in the information we provided with the questionnaire that we recognise that this is a contested issue. Based on the support of 75% of respondents in respect of our title, the results of our focus groups, and because the term 'gender-based violence' is recognised and used locally, nationally and internationally, we have decided not to alter the strategy in that regard.

In considering the responses, in Chapter 2 we have:

- Re-ordered the first few paragraphs in order that the different forms of gender-based violence are explicitly stated earlier on, as is the already included statement that, "Gender-based violence, does not only include physical assaults. It also includes emotional, psychological and financial forms of abuse and other forms of non-physical forms of violation and abuse."
- Added specific reference to sexual exploitation being committed either on or off-line.
- Added specific reference to offences committed via social media.
- Explicitly defined what is meant by romance fraud.
- More explicitly referenced that harassment and violence directed at trans, gender-queer and non-binary people is included as gender-based violence.

In addition specific reference has been made to the Government's End-to-End Rape Review, which was published during the consultation stage.

Key Strategic Priorities

Our ten key strategic priorities are detailed in Chapter 1 of our strategy. 81% of respondents agreed with these priorities. Respondents were asked to rank what they felt were the three most important.

As a result of the feedback in respect of this chapter we have:

- Defined what is meant by the term 'misogyny.'
- Made specific reference to the important role of the voluntary, community and social enterprise sector, including 'by and for' services, both here and throughout the document. We have also altered language where we previously referred to 'specialist services' throughout the document so it is explicit this includes the VCSE sector.
- Elevated the priority in respect of "maximising accountability to victims and survivors," to priority number 3.
- In respect of priority 5, inserted words to make clear the strategy targets threats posed by on-line abuse.
- Added to priority 9 to the effect that our work with employers, professional bodies and governmental inspectorates will include working towards new internal policies for tackling gender-based violence and harassment in the workplace.

Mobilising Greater Manchester

77% of respondents agreed that the commitments made in this chapter were the right ones. The first commitment of developing, “a programme of public engagement that highlights how attitudes and inequalities contribute to gender-based violence, including a campaign directed at men and boys,” was the highest ranked.

Campaigns

The need for all campaigns to be accessible was brought up several times. This included multilingual campaigns in a variety of different spaces such as hospitals, GPs, toilets of hospitality venues and police stations. Many supported greater investment in engagement to ensure maximum inclusivity and accessibility. Whilst many recognised that campaigns speaking to men and boys were important, they didn't want them to come across as accusatory.

Safety on transport

Feelings of not being totally safe on public transport was a theme consistently raised by respondents, with many calling for a greater presence of police and figures of authority consistently visible on the network.

Introducing a discrete emergency contact system on public transport was considered a tangible commitment and people thought that this would make it easy to measure.

This issue is identified in the strategy and we believe is adequately addressed with several key commitments made in this regard.

Pornography

Some responses called for greater inclusion of the harmful effects of pornography to be included within the strategy. They argued that the increasingly sexualised mainstream pornographic culture was normalising violence and that this strategy should aim to raise awareness of the influence that pornography has, for example with young people.

Sex work

People shared various views around sex work, much of which opposed one another. Some felt that the strategy should push for the closure of strip clubs and brothels as they felt that sex work was inherently harmful to women.

Others felt that those working in the sex industry needed to have their voices heard and felt that mentioning sex work only a couple of times within the strategy was not sufficient. They wanted a commitment to working to combat violence against sex workers that was guided by sex workers themselves as they felt that there needed to be tailored services for this group of people.

Training for employers

A proportion of respondents considered preventing violence and harassment in the workplace as a priority and they wanted to see training for employers that would help them identify issues and know what to do if someone was experiencing gender-based violence in the workplace.

As a result of the overall feedback received in respect of Chapter 3 – ‘Changing the Story,’ we have:

- Stated that the Gender-Based Violence Board will be asked to consider devising bespoke plans to address the diverse needs of disabled people, older people, ethnic minority communities and sex workers.

- Made specific reference to the fact that the new Domestic Abuse Act now recognises children who have witnessed domestic abuse be as victims.
- Defined what is meant by 'neurodivergent.'

In respect of Chapter 4 – 'Mobilising Greater Manchester,' we have:

- Included "or working on-line," with reference to developing health and safety procedures to safeguard victims of domestic abuse who may be at risk of stalking or harassment when travelling to or from work.

Supporting Victims and Survivors

89% of respondents agreed that the commitments in this chapter are the right ones. The commitment to “review how domestic abuse cases are managed by Greater Manchester Police....” Was ranked highest.

Men

Some responses focused on what they considered the gender bias within the strategy and felt that male victims were not included enough. Lots focused on the low reporting rates for male victims but understood this as a consequence of toxic gender norms which prevent men from seeing themselves as victims. Although the definition does include male victims, some thought that the rest of the document excluded them.

As previously stated, our strategy specifically recognises that men can be victims of gender-based violence and have distinctive needs in this regard. That said, all of the available evidence indicates that gender-based violence against women and girls makes up the vast majority of such offending and therefore the strategy predominantly focuses in that direction. This is made clear in the Foreword and Introduction to the strategy document, by the Mayor and Deputy Mayor respectively. In recognising men can be victims and have distinct needs, we committed to developing a bespoke plan in this regard and this remains the case.

Equality and Diversity

A large number of responses focused on the need for greater commitment to long-term funding for specialist ‘by and for’ services for black and minoritised women, older women, disabled women and LGBTQI+ people and detailed some of the distinct issues people from these groups face. They argued that many women and girls do not access the criminal justice system but instead seek support to rebuild

their lives from community-based specialist services and that sustainable provision of these services was essential.

People commended the recognition of LGBT abuse as a subcategory but felt that there was not the same recognition of the challenges and different experiences that women from ethnic minorities experience. They wanted greater detail around how these women would be supported. Similarly, some respondents felt that a specific section on disabled people and gender-based violence was needed.

A proportion of responses referenced the challenges disabled people face when the person abusing them is also their carer. They highlighted the role that GMCA could play in lobbying the government to make an amendment to the Domestic Abuse Act that would take away the carers defence (that the victim was restrained as part of their caring role). A number of other challenges were also highlighted in respect of disabled people.

Accountability to victims

A few responses commented on the poor experience that some victims have, experiencing long wait times and poor practice. They felt that there needed to be more accountability from services and a route for victims to complain if they are not happy with the service they have received.

Service Provision

There was a clear expression that came through that what is most important for the strategy to make a difference is a focus on ease of reporting, accessibility of services for all, followed by practical help. Ease of reporting and speed of access to services will encourage more reporting whilst training of frontline staff to enable signposting to relevant support services will also boost access to support. After this, the focus should be on the practical elements of support such as housing and finance.

We believe that all of these themes are referenced and addressed in the strategy.

In response to the overall feedback received in respect of this chapter, in addition to relevant amendments referred to in preceding chapters, we have:

- Again referenced the End-to-End Rape Review and recognised the need to build increasing confidence in the criminal justice response to victims and survivors for all forms of gender-based violence.
- Inserted specific reference to addressing “the exploitation of dependent adults.”
- Where we refer to assessment procedures fully taking account of the social, emotional and economic needs of victims and survivors from ethnic minority communities we have added, “specifically, we will ensure that victims experiencing the threat of gender-based violence from multiple perpetrators within their own families and communities are provided with places of safety and that the exceptional risks they face are properly recognised and understood by all those intervening and supporting them.”
- Where we refer to developing and evaluating an approach to housing and law enforcement that prioritises moving perpetrators as opposed to victims and survivors – we have stated our intention to utilise the ‘Whole Housing Approach,’ developed by the Domestic Abuse Housing Alliance (DAHA).

Meeting the Needs of Children and Young People

90% of respondents agreed that the key commitments made in this chapter were the right ones. The commitment, “Increasing investment in children and young people’s mental health.....” was ranked highest.

Education

There was a strong response around children and young people and lots of this focused around schools and education settings. Lots felt that all education settings including academies, free schools, private schools and alternative education settings needed to have a standardised approach which centred around teaching children about respect, regardless of difference.

Sex and relationship education was considered a priority so that young people are taught from a young age what a healthy and respectful relationship looks like. Some responses thought that this sex and relationship education should be taught by trained specialists rather than normal teachers so that the right messages are made clear. Many specifically referred to the importance of education in respect of ‘consent.’

GBV in schools

Some responses felt that there needed to be more attention given to the sexual assault or harassment within schools amongst students, especially considering the findings of the Ofsted report. Staff training around awareness and the tackling of sexist or abusive behaviour amongst young people was felt to be a need.

In response to the overall feedback and current context, in respect of this chapter we

have:

- When discussing preventative education made specific reference to the issue of 'consent' and 'pornography.'
- Referenced the OFSTED report on sexual harassment in colleges in schools, which was published during the consultation period, and made the following additional commitments:
 - We are committed to working with and supporting headteachers and college principals to ensure all schools and colleges provide a safe space where children and young people are protected from gender-based violence and feel able to disclose threats and risks of harm to them.
 - Our Violence Reduction Unit will work with schools and colleges to share good practice that identifies and prevents violence, including learning about specific needs that have arisen in the context of the pandemic.

Responding Effectively to Perpetrators

76% of respondents agreed that the key commitments made in this chapter are the right ones. “Extending the geographical reach of provision for men who have been abusive in heterosexual relationships,” was ranked as the highest priority.

More perpetrator work

Some responses wanted greater focus on working with perpetrators to prevent gender-based violence from continuing. This includes a better understanding of why perpetrators are using violence and joining up the services that can support them such as perpetrator programmes, substance misuse services and mental health support.

A few responses also mentioned the need to intervene earlier with those showing warning signs. People pointed to the escalation of offences such as exposure and voyeurism to more serious violent crimes.

We believe that the content of this chapter adequately addresses these issues.

Involvement of perpetrators

On the other hand, some responses felt that the focus on perpetrators was too large and that the resources associated with this strategy should go towards supporting victims and that it was not the onus of victims to educate perpetrators.

We agree that the onus is not on victims to educate perpetrators. It is however the responsibility of statutory agencies. We know that many perpetrators offend against

multiple victims and thus if we are truly to take a preventative approach, we must have a focus on attempting to change their behaviour. In essence this is about preventing people being subjected to gender-based violence in the future. We will only fully invest in perpetrator programmes, beyond pilot stages, where evidence is accumulated to show their worth. This is why the vast amount of funding in this regard has been secured from the Home Office for this specific purpose. We make proposals throughout the strategy to strengthen services for victims and survivors and continue to make the case to Government for enhanced and sustainable funding in this regard, as do many others. The Mayor makes this clear in his foreword.

Restorative Justice

There were a lot of responses received which expressed concerns with the use of restorative justice for domestic abuse victims. They felt that this could give perpetrators access to their victims to continue the abuse and control. This could be unnoticeable to those outside of the relationship, for example through subtle signalling. They argued that survivors are often retraumatised and the work they have done to rebuild their lives is rolled back.

Based on the overall feedback and current context, in respect of this chapter we have:

- Taken account of emerging evidence that suggests high rates of perpetration of domestic abuse amongst gamblers, and also that gambling can be connected to the financial aspects of coercive control and exploitation for women living with high levels of debt. We make reference to pioneering new approaches being taken to identifying perpetrators and victims in this regard and the route to developing interventions.
- We have expanded the section on restorative justice to reflect that this service will only be considered where victims and survivors specifically request it. It is the case that such requests are made, and until recently there has been no provision. We reflect that this is not considered as an 'out of court disposal'

and only initiated post-conviction, as opposed to prosecution, and is subject to multi-agency risk assessment and accompanying victim advocacy.

Improving Policing and Criminal Justice

Policing

90% of respondents agreed that the commitments outlined in this chapter, in respect of policing, are the right ones. The commitment, “Ensure all frontline police officers know how to request to talk to victims on their own so that they feel safe to disclose abuse and speak clearly to children exposed to abuse,” was ranked highest, closely followed by the one which states, “Ensure that abuse cases involving serious harm and risk are subject to bail conditions that protect victims and that risk assessments are revised and the Crown Prosecution Service notified before suspects bail statuses changed or they are released under investigation.”

Worries around priorities

Some responses commented that the priorities around the police should be common practice and were concerned that they were being presented as goals as this was setting a very low bar for GMP. Others recommended speaking with victims around what they would like from the police and other front-line services.

We agree that some of the priorities should be common practice. The new chief constable of GMP has set the force on a major improvement plan following the findings of HMICFRS in December last year when they published their Victim Services Assessment. We believe this strategy will assist in this regard, in terms of improving and maintaining standards. Indeed early in the strategy a commitment is made to review how GMP deals with domestic abuse cases with a view to ensuring consistently high standards. We also describe in the strategy how we will ensure

that the voices of victims and survivors are heard and utilised to influence policy and practice. This will include the policy and practice of GMP.

Involvement of police

There was strong opposition to the heavy involvement of the police within the strategy as people felt that the trust in GMP and the police more generally had been broken.

A few responses recommended setting up a task force within police forces that focuses on ending gender-based violence by dismantling myths and helping officers to support victims in a positive way. This links to several responses which discussed the issue of police not believing victims. Many felt that that the police fail to treat victims with respect and trust and are biased in who they consider to be a victim.

Whilst the above is recognised and although it is estimated that only 1 in 6 people who are subjected to domestic abuse report to police, the fact remains that this represents a large amount of people who approach the police for help, often in times of immediate crisis and danger. We and the new chief constable are therefore determined that GMP is on a path to providing a much enhanced service to the one that has been available hitherto and this is thus the focus and intent of this chapter. We make clear in the strategy that gender-based violence cannot be tackled solely via the criminal justice system. We also outline the importance of prevention and services for victims and survivors and many of our commitments are in that regard. Based on previous feedback we re-ordered our chapters making this clearer through the flow of the document. All of the engagement we have carried out has left us struck by the number of victims and survivors who talk of being “re-traumatised,” by the criminal justice system. Justice, for many victims and survivors, though certainly not all, is an important element of recovery. We must therefore have a focus on making all elements of the criminal justice system as effective as possible, in its ability to secure justice, but also to treat victims with dignity, respect and courtesy.

Training

The need for training in the police force was brought up a lot. Some focused on the need for training around lived experiences of gender-based violence and bias training to ensure that everyone is getting the right response no matter what their background is.

Others felt that there was a strong need for the police to better understand coercive control and the specifics of the current law as well as how to spot it and what could count as evidence in court if the victim chooses to pursue a criminal justice outcome.

Others wanted further training for the police around how women can become criminalised as a result of domestic abuse and sexual violence as well as the 'low-level' crimes such as exposure, voyeurism or stalking which need intervening with early on to prevent them escalating into abuse, violence and even homicide.

Training is referred to several times in this chapter, as well as others, both broadly and particularly in respect of stalking, harassment, coercive control and new legislation. It is indeed a crucial element of the strategy and a golden thread in respect of the improvements we wish to see in policing. The insights from this consultation, as well as other sources, including from those with lived experience will be taken into account when developing training.

GBV within the police

Some responses wanted greater recognition of the levels of violence against women that they assert is committed by police officers and the culture of covering this up that may exist.

We discuss in Chapter 4 of the strategy, the issue of abuse where it is perpetrated by police officers or other professionals in the criminal justice system. In doing so we reference a super-complaint made by the Centre for Women's Justice (CWJ) in

respect of 'police perpetrated domestic abuse,' which is currently being investigated by HMICFRS, the Independent Office for Police Conduct and College of Policing. We describe how Greater Manchester Police, working with the Deputy Mayor, have already produced a detailed action plan in response to the issues raised by CWJ and in lieu of the findings of HMICFRS et al.

Based on the overall feedback and current context, in respect of this chapter we have:

- Added that the Deputy Mayor will closely monitor and oversee how the Early Investigative Advice Process is working between GMP and the Crown Prosecution Service, including its digital dimensions. This was specifically referenced in the End-to-End Rape Review.
- In respect of investigating offences of rape, stated that we will ask the Chief Constable to anticipate the need to implement a new 'Gold Standard' framework focusing on investigating the suspect and improving victim engagement, consistent with that being trialled by the Home Office via Avon and Somerset Police. This too was referenced in the Rape Review.

Criminal Justice

91% of respondents agreed that the commitments made in respect of the wider criminal justice system were the right one. The commitment centred around the National Probation Service ranked the highest.

Decriminalising women

Some responses focused on the fact that women can become criminalised as a result of suffering domestic abuse. They wanted to see a stronger commitment to diverting these women from the criminal justice system where possible and

prioritising community-based and supportive sentencing for those who present no risk or harm to others and where a short custodial sentence would be damaging for both them and their children. Some mentioned using the Women's Problem-Solving Court and Women MATTA.

As a result of the overall feedback, in respect of this section we have:

- Stated that we will monitor and evaluate elements of the Family Drug and Alcohol Court (FDAC) in Stockport. This is the first FDAC in Greater Manchester, which takes a problem solving approach to care proceedings, where substance misuse an issue with one or both parents. There is a high prevalence of domestic abuse related issues associated with these cases and GMCA has provided funding to Stockport council to employ a specialist domestic abuse caseworker in support of the FDAC process. GMCA will evaluate the effectiveness of this role and be party to wider evaluation, which may support the potential for wider roll-out across Greater Manchester.
- Added a commitment to wherever possible, utilise the Women's Problem-Solving Court to attempt to divert female defendants charged with crime deriving from problems with debt, health, parenting, housing and substance use, in the aftermath of gender-based violence from further offending.

Integrating Health and Social Care

88% of respondents agreed with the key commitments made in this chapter. The commitment to “develop new training to enhance understanding of gender-based violence among social workers and Children and Family Court Advisory Support Service (CAFCASS) officers, with specific focus on the need to support mothers who have lived with abuse, develop systems that do not allow abusive men to evade intervention; and upskill those working with young people in the principles of practices of contextual safeguarding,” was the ranked the highest.

Adopting a whole health approach

A recommendation was made that Greater Manchester adopts a whole health approach which joins up local health partners, acute health, mental health and primary care with local domestic abuse specialist services. IRISi, a social enterprise established to promote and improve the healthcare response to gender-based violence was put forward as an organisation that has expertise in engaging health professionals in gender-based violence interventions.

Although IRISi is not specifically referenced in the strategy, the programme does operate in some areas of Greater Manchester. In other areas there are differing programmes of work that operate to similar principles. The overall ambition of our strategy in respect of health and social care is reproduced below and commitments are contained within this chapter that we believe will help us achieve this ambition.

In Greater Manchester, we are striving to integrate services for all victims of gender-based violence to ensure we meet their long-term social, emotional and health care needs.

Taking account of the overall feedback, in respect of this chapter we have:

- Where we refer to a new programme of training for CAFCASS officers, we have added that this training will take full account of the recommendations of the Ministry of Justice's (2020) report on Assessing Risk of Harm to Children and Parents in Private Law Children Cases.
- Where we refer to reviewing provision for older people, we have added that we will help health providers, care workers and social services to identify new screening tools to better recognise the specific dimensions of coercive control - including financial abuse and withholding of care and medicines – suffered by older victims. We will also review whether our refuge provision is meeting the needs of older women, women with disabilities and women with enduring healthcare needs.