**Domestic abuse consultation – Girlguiding response**

**About Girlguiding**

1.1 Girlguiding is the leading charity for girls and young women in the UK, with over 500,000 members. Thanks to the dedication and support of 100,000 amazing volunteers, we are active in every part of the UK, giving girls and young women a space where they can be themselves, have fun, build brilliant friendships, gain valuable life skills and make a positive difference to their lives and their communities. We build girls’ confidence and raise their aspirations. We give them the chance to discover their full potential and encourage them to be a powerful force for good. We give them a space to have fun. We run Rainbows (5–7 years), Brownies (7–10 years), Guides (10–14 years) and The Senior Section (14–25 years). Registered Charity No 306016. [www.girlguiding.org.uk](http://www.girlguiding.org.uk)

K**ey messages**

* We are for all girls
* We give girls their own space
* We give girls a voice
* We change as the lives of girls change

**About our evidence**

1.2 Girlguiding’s submission focuses on evidence from our annual Girls’ Attitudes Survey – the largest survey of girls and young women in the UK – which gathers the views and opinions of over 1,600 girls and young women throughout the country aged 7 to 21, from inside and outside guiding. For more information and data on the latest and previous reports please see [www.girlguiding.org.uk/girlsattitudes](http://www.girlguiding.org.uk/girlsattitudes)

**Questions**

1. **Do you agree with the proposed approach to the statutory definition?**

2.1 As the leading UK charity for girls and young women, our response to this consultation focuses on their experiences and the unacceptable gendered pressures they face. We gain girls’ views from our annual Girls’ Attitudes Survey, the largest survey of girls and young women in the UK. Our Safeguarding department has also raised areas that would be useful for the government to explore in relation to the issues in this consultation.

It’s positive that the consultation recognises the complexity of domestic abuse and outlines the different types of abuse that it can include. We’d also suggest exploring how to address the question of age within the definition of domestic abuse as children under 16 may be experiencing both child abuse and domestic abuse (and there can be blurred lines between the two).

As a member of the End Violence Against Women (EVAW) coalition, we recognise their expertise in this area and support points made in their [response](https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/Updated-EVAW-DVA-Bill-Consltn-Submission-DRAFT-FOR-WEB-SHARING-26-APR-18.pdf) to this consultation. For example, we agree that the Bill needs to do more to recognise the continuum of violence – including sexual violence and harassment. As EVAW outline within their response:

*The limiting of the Bill proposals to measures addressing domestic violence only is also disappointing when the established national policy framework is violence against women and girls, and is not true to many women’s lived experience of different forms of abuse. There are ongoing urgent needs for changes in the criminal law related to sexual violence including the need to address sexual history evidence in rape trials; rules around disclosure rules; so-called “upskirting”; and anonymity for complainants across sexual offences.*

2.2 Our evidence shows that girls and young women in the UK experience frequent unacceptable harassment and abuse. Our 2017 Girls’ Attitudes Survey showed that of girls aged 11 to 21, 39% had had their bra strap pulled by boys and 27% had had their skirt pulled up *in the past week*. In the past year 64% of girls aged 13 to 21 had experienced some form of sexual harassment, such as:

* Jokes or taunts of a sexual nature (41% up from 37% in 2014)
* Sexist comments on social media (36% up from 15% in 2014)
* Seeing obscene graffiti about girls or women (22% up from 18% in 2014)
* Seeing unwanted sexually explicit pictures or videos (24% compared to 25% in 2014)
* Unwanted touching (19% compared to 19% in 2014)
* Frequent unwanted attention (19% up from 14% in 2014)

Just 28% of girls had not experienced sexual harassment in the previous year (compared to 36% in 2014).

Our 2015 Survey showed that three quarters of girls say anxiety about sexual harassment negatively affects their lives – whether it’s their choice of clothing (51%), body confidence (49%) or their freedom to go where they want on their own (43%). The majority of girls also said they feel online pornography has a strongly negative effect on gender equality and that access to it is damaging young people’s views of sexual relationships. Of young women aged 17 to 21:

* 80% think it encourages society to view women as sex objects
* 78% think it encourages gender stereotyping
* 71% think it makes aggressive and violent behaviour towards women seem normal
* 71% think it sends out confusing messages about consent
* 65% think it increases hateful language used about and to women

2.3 We are delighted that age-verification for online pornography has been brought in with the Digital Economy Act and that Relationships and Sex Education (RSE) has been made statutory as part of the Children and Social Work Act to help to address these issues in England. Please see our [consultation responses](https://www.girlguiding.org.uk/social-action-advocacy-and-campaigns/promoting-girls-voices/girls-influencing-policy/our-policy-consultation-responses/) on these and other gendered issues for more information. The Domestic Abuse Bill should also recognise the kinds of gendered pressures and unacceptable behaviours which disproportionately affect women and girls – such as sexism, abuse and harassment online and in their everyday lives – and how these intersect with other kinds of abuse and contribute to a culture in which women are much more likely to experience all kinds of abuse.

In addition, as members of the IC Change campaign – which aims to speed the ratification of the Istanbul Convention – we welcome references to the Istanbul Convention, but agree with EVAW that it’s important that support and advocacy is outlined alongside this. Currently, the consultation document misses the opportunity to do so.

1. **Will the new definition change what your organisation does?**

2.4 The changes will mean that we update our safeguarding training to ensure all staff and volunteers are aware of legislation and their responsibilities. We will continue to build resilience through our programme and activities and to raise awareness through our Safe Space training.

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

2.5 Efforts to do this should take into account and incorporate work that has already been completed and is being delivered safeguarding, domestic abuse and VAWG as opposed to starting again from scratch.

1. **What impact do you think the changes to the age limit in the 2012 domestic abuse definition have had?**
2. **We are proposing to maintain the current age limit of 16 years in the statutory definition – do you agree with this approach?**

2.6 We know girls under the age of 16 can experience abuse from boys they are in relationships with and this needs to be considered and understood by all the relevant parties. We believe this needs to be done through education and have made recommendations on what we believe should be included in the new Relationships and Sex Education (RSE) curriculum in our [response](https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/girlguiding-rse-and-pshe-consultation-response.pdf) to the government’s consultation on this issue.

1. **In addition to the changes being made to how relationship education will be taught in schools, what else can be done to help children and young people learn about positive relationships and educate them about abuse?**

**RSE curriculum**

2.7 We believe getting the content of Relationships and Sex Education (RSE) right is essential to equip young people with the tools to make informed decisions and stay safe. As we said in our response to the government’s consultation on this issue, guidance should ensure that this includes sexual consent, online safety, tackling violence against women and girls, and LGBTQ+ and healthy relationships. In addition, government should place a duty on schools to prevent and tackle sexual harassment and to be held accountable.We were pleased to be part of the working group to develop guidance for schools to tackle sexual violence and harassment to ensure schools are equipped in responding effectively and appropriately to such incidents.

**Statutory PSHE**

2.8 We were pleased to see that the government has taken the power to make PSHE statutory – something that 81% of girls and young women told us they support – and recommend that this happens as soon as possible. PSHEshould support young people to build resilience and learn about body confidence, gender equality, and challenge sexism, narrow beauty ideals and sexual harassment and abuse.See our [response](https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/girlguiding-rse-and-pshe-consultation-response.pdf) to the government’s consultation on RSE and PSHE for more details on what we believe should be included in RSE and PSHE lessons.

**Online influencers**

2.9 It would be worth considering how online influencers, such as YouTubers, could help spread messages about online safety, due to their immense popularity amongst young people. Our 2017 Survey showed that 55% of girls aged 11 to 21 go to YouTube to find out something they’re not sure about and over a third (34%) would be more likely to get advice from a YouTuber than their parents. This would have to be done carefully to ensure that those spreading messages were appropriate ambassadors (and not known for spreading inappropriate content).

It’s also important not to assume that young people will want to access everything online simply because they are ‘young people’. Many may prefer a face to face approach or find this easier to access and so information should be available through a variety of means so it meets the needs of all young people.

**Peer support**

2.10 We think there are positive aspects to the government’s proposal (detailed in its Internet Safety Strategy consultation) to use online peer support networks to teach children and young people to stay safe (particularly online but this could also be relevant to safety in the rest of young people’s lives). Please see our [response](https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/girlguidingresponse_internetsafetystrategygreenpaper_november2017.pdf) to this consultation for more details. However, there is a need to consider how to achieve a balance between giving young people the space to talk openly about issues and not exposing them to further abuse from others within a group. To ensure this is the case, peer educators must receive proper support and training. We know that the peer-to-peer method can work well, as our own peer education programme has proven successful in giving girls a space to talk about issues that are important to them with peers they trust. Free Being Me sessions help girls recognise beauty myths, grow in confidence and be happy in their own skin. Think Resilient is designed to help girls build mental wellbeing and grow resilience.

While peer support is one way to tackle this issue, it should not be considered a catch-all solution and should be implemented alongside other forms of support and education, including quality RSE and PSHE (as discussed) and support and guidance for parents and guardians. This should be delivered alongside efforts to tackle broader sexism within society and the media.

**Tackling broader societal sexism and negative representations of women and girls**

2.11 In addition to teaching children and young people about positive relationships and abuse, the broader sexist culture and negative media representation of women within our society must be challenged to tackle the everyday sexism, harassment and abuse facing girls and young women and eradicate violence against women and girls. Our 2017 Girls’ Attitudes Survey showed that 95% of girls aged 11 to 21 want to see more positive, diverse representations of girls and women in advertising and 88% said it should stop using sexualised images of women and men. As discussed in our response to question 1, our 2015 Survey showed that the majority of young women aged 17 to 21 also said they feel online pornography has a strongly negative effect on gender equality and that access to it is damaging young people’s views of sexual relationships.

1. **Which statutory agencies or groups do you think the UK government should focus its efforts on in order to improve the identification of domestic abuse?**

2.12 We think the government should focus efforts on all the options on the list so that more services are equipped to help young people access the support they need rather than turning them away. It’s especially important that schools have the training and expertise to do this. The government should also look at non-statutory agencies. The government should treat voluntary sector organisations as equal partners in areas where they have expertise and explore how voluntary sector organisations – which are often embedded in and trusted within the communities they serve can help people to access support services. Voluntary sector groups also have a role in developing people’s resilience and providing early intervention to prevent problems from escalating.

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

2.13 Training needs to be an integral part of the process of embedding people’s understanding of domestic abuse. Training delivered to statutory and VCSE organisations must not be isolated but take place alongside and within a culture of understanding safeguarding and how to respond to all the issues this includes.

In addition, we welcome the recent guidance for schools on tackling sexual violence and harassment and see this as a positive step forward.

1. **What further support can we provide to the public (employers, friends, family, community figures) so they can identify abuse and refer victims to help effectively?**

2.14 The government should explore ways of making the system more flexible so people can get help – or the right information about where to go for help – at whichever service they approach.

Support should be as accessible as possible to people who may not have a lot of control over their lives and ability to move freely around. Advertising could include community sites where people typically visit – e.g. the GP surgery, hairdresser, bus shelter etc. as well as via radio, television and the internet. Support should be advertised and embedded both nationally and locally.

1. **We are** **in the process of identifying priority areas for central government funding on domestic abuse. Which of the following areas do you think the UK government should prioritise?**

2.15 We think it’s vital that funding should be invested in children and young people to help prevent domestic abuse in the first place. This should take place through quality RSE and PSHE as well as through the other methods we outlined in our response to question 6. It’s also important to ensure that young people and their needs are fully considered around whichever programmes are funded to tackle domestic abuse.

In addition to targeted funding, support should be more mainstream and sustainable to ensure that vulnerable people can access it.

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

2.16 Government should explore ways to improve communication between statutory and voluntary sector services and organisations.

1. **What more can the government do to better support victims who face multiple barriers to accessing support.**

2.17 Government should explore ways to make support easier to access – e.g. through advertising in community locations. We also think funding to improve services should be allocated with those who face the greatest barriers to access those services in mind.

1. **How can we work better with female offenders and vulnerable women at risk of offending to identify their domestic abuse earlier?**

2.18 Government should explore ways to ensure that support takes into account the specific gendered barriers and pressures facing women, such as sexism, online abuse and sexual harassment. See our response to question 1 for more details. In addition, government and other partners must listen to girls and women and take their voices seriously to encourage them to speak up.

1. **How can we make greater use of women-specific services to deliver interventions in safe, women-only environments?**

2.19 As a girl only organisation, we know the value of girl and women only spaces where girls and women can feel safe and be themselves.

1. **Which persons or bodies should be specified by regulations as ‘relevant third parties’ who can apply for a Domestic Abuse Protection Order on a victim’s behalf?**

2.20 Efforts to make support and referrals more flexible and accessible and responsive to the needs of women (and all victims) are positive.

1. **We propose that there should be multiple routes via which an application for a Domestic Abuse Protection Order can be made, including:**

• **at a magistrates’ court by the police following the issue of a Domestic Abuse Protection Notice or at any other time**

• **as a standalone application by, for example, the victim or a person or organisation on the victim’s behalf to a family court**

• **by a party during the course of any family, civil or criminal proceedings**

**Do you agree?**

2.21 Broadening the services where people can get help to promote access to support is positive.

1. **What further support could survivors receive to prove their safety would be at risk if their name and address appeared on the electoral register? Please put forward one suggestion.**

2.22 We believe all women should be able to participate in democracy and that being victims of domestic abuse should not act a barrier to this.

1. **Do you agree the guidance underpinning the DVDS should be placed on a statutory footing?**

2.23 We agree that guidance should be statutory to provide stronger protections to women.

1. **What more can we do to tackle domestic abuse which is perpetrated online, or through control of technology?**

2.24 We think that appropriate reporting categories, clear guidance for social media companies and government/charities and others promoting awareness are all useful ideas. Other organisations will be better placed to comment on some of the other options in the list.

Our evidence shows that girls and young women frequently face abuse online, including cyberbullying, harassment and abuse and being exposed to unwanted violent or graphic imagery. Our Girls’ Attitudes Survey highlights the inappropriate content girls have been exposed to and what impact this has. In 2017:

• 54% of girls aged 11-21 said they have come across unwanted violent or graphic images online that made them feel upset or disturbed

• 26% of girls aged 13 to 21 said they have come across pornography accidentally

• 50% aged 7 to 10 are worried about seeing rude pictures online

• 44% aged 11 to 21 have seen statements about women or girls that they thought were sexist on the news or social media in the past week and 47% had seen stereotypical images of men and women that made them feel less confident to do what they want

• 65% see or hear gender stereotypes on social media often

2.25 Our 2016 report ‘Girls’ wellbeing explored’ showed a worrying tendency for girls and young women to normalise and shrug off incidents of harassment and abuse and more needs to be done to help them feel confident to report them. Fear of embarrassment, shame and being blamed can stop girls opening up about the pressures they face, preventing them from getting the support they need. The research showed that when girls do seek help, it is often from their friends rather than professionals. This is reflected in the online world. Evidence from our 2013 Girls’ Attitudes Survey showed that girls aged 11 and up tend to react in an informal way to rude or abusive messages online. 59% of girls delete the messages and block the sender, 39% ignore the messages, 30% tell a friend or a sibling and 22% tell their parents. Girls aged 16 to 21 are more likely to report comments to a moderator (29%) than those aged 11 to 21 (22%).

2.26 To respond to the Internet Safety Strategy inquiry, we asked girls from our youth panels what would help them feel safe and they said they wanted to know more about where to get help and support, and that more should be done to build resilience and challenge the gendered pressures they face.

*“I don’t think girls feel comfortable reporting abuse, as they may not even recognise it as being abuse in the first place. I think every comment or message with a potentially harmful word in should be flagged, alerting the girl that it has the potential to be abusive. Then, if the girl recognises that the comment is abusive, they can easily report it.” (Laura, Advocate, 16)*

*“I think it’s incredibly rare for girls to report abuse and harassment, likely because they fear judgement or being told that ‘it happens’. This leads girls to feel as though their harassment is not worth anyone’s time, but this needs to end. Spreading awareness of harassment and educating people to know that it should be reported would be a big step forward for reporting abuse to be more supported.” (Imogen, Advocate, 15)*

*“I don’t think girls feel comfortable reporting harassment, particularly when it comes from male peers and acquaintances. This is because, in my experience, many girls feel they need to "laugh it off" and fear being labelled a "snake" by others for reporting unacceptable comments. I think although most websites are clear on their safety functions, it doesn’t necessarily get used by girls because of these fears.” (Izzy, Advocate, 15)*

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

2.27 It’s important that the government takes into account the gendered form that coercive and controlling behaviour in relationships can take. Our 2013 report, [Care Vs Control: Healthy Relationships](https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/carevscontrol_2013.pdf), describes the findings of our research into controlling and coercive behaviour in teenage relationships. We carried out the research after our 2012 Girls' Attitudes Survey, found:

* two fifths of girls aged 11 to 21 said they thought it was acceptable for their partner to keep tabs on where they are all the time
* 21% believe that it's acceptable for a partner to shout at them and call them names.

We found that while most girls were clear that violence, threats, sexual coercion and abusive relationships are unacceptable in theory, some struggled to identify this in real life scenarios and some girls were less clear about more subtle forms of abuse and controlling behaviours. Primarily, some girls saw behaviour rooted in jealousy and lack of trust as evidence of genuine care and concern for their welfare.

We also found that partners were using social media to monitor what girls were doing, constantly 'checking-in'. This can cloud girls' judgement about what level of control and surveillance is acceptable if they are not getting the right information and support elsewhere.

Girls told us they didn't feel able to talk to parents or teachers about their relationships and that they weren't getting enough information about healthy relationships at school.