

Written evidence submitted by FiLiA (DAB40)

Please accept FiLiA's submission for the Domestic Abuse Bill 2019 -21

1. 'FiLiA' means daughter; we are the daughters of the women who came before us and we fight so that our daughters may be free. We are a women-led volunteer organisation. The focus of our work is our annual **Women's Rights Conference**, which we have hosted since 2013. Our conference has platformed hundreds of speakers from 49 countries. FiLiA also takes part in other activities including art exhibitions, consultations, campaigns etc subject to capacity. Since 2013 we've moved to a 2-day event, have taken the conference out of London and have also gained charitable status. Our charitable aims are:
 2. ♀ To promote human rights (as set out in the Universal Declaration of Human Rights and subsequent United Nations conventions and declarations) and in particular women's rights throughout the world
 - ♀ The promotion of equality and diversity, in particular equality between women and men, and to eliminate gender discrimination, including by running an annual conference
 - ♀ To promote art for the benefit of the public, in particular to promote the art of women, especially socially excluded women, by the provision of an art exhibition at the annual conference, and other collaborations
 3. FiLiA's **mission** is to contribute to the Women's Liberation Movement by:
 - ♀ **Building Sisterhood and Solidarity** (locally, nationally, globally)
 - ♀ **Amplifying the Voices of Women** (particularly those less often heard or purposefully silenced)
 - ♀ **Defending Women's Human Rights**
4. This response builds on our previous [submission](#) and the submission from specialist Violence Against Women and Girls Services.

DA Bill Amendments (20/05/20)

5. **Part 1 Definition.** We disagree with the possible amendment (1) which removes paragraph (d). Surviving Economic Abuse has led the way in showing the complex and long-term harms of economic abuse and it essential that it is included in the definition. We disagree with all the other amendments (2, 5 6 & 7) related to economic abuse.
6. We draw attention to the dangers of including amendments (8, 9, 10, 11) re Parental Alienation. Parental Alienation has recently been removed from the classifications used by [the WHO](#) as is considered pseudo-science with no reliable evidence base. Numerous reports see it often being used by perpetrators of domestic abuse to further abuse women and children through the family court. It is important that the government does not give it credence. Parent Alienation Syndrome seeks to remove the importance of the unique role of the mother/child bond and seeks to justify the behaviour of the father by neutralizing and undermining the seriousness or validity of allegations of abuse (Meier). The outcome is to remove the child from their mother and break the bond, to place the child with the alleged abuser and deny a normal relationship with the primary attachment figure (their mother) (Goldstein 2017).

This paralyses victims, who are scared to raise allegations of domestic abuse in family courts for fear of retribution from the courts through unsafe contact and change of residency. Consequently, courts enable perpetrators of abuse to use the court system to continue this abuse, putting mothers and their children at risk. Embedded ideologies marginalise safeguarding issues (Macdonald 2017)

7. We disagree with the same members amendment (16) to include reference to a 'gender neutral' approach to domestic abuse. Domestic abuse is a cause of consequence of sex inequality and is sadly and terribly borne out by the domestic homicide statistics. We do however agree that the monitoring of victim and perpetrators (17 & 18) of domestic abuse must be classified by sex (not gender) This will ensure the continued and realistic monitoring of this sex-based crime.
8. **Part 2 - Appointment of commissioner.** We are pleased that the delay in the DA Bill has not prevented the appointment of the Domestic Abuse Commissioner who already is making a positive difference. We endorse the advisory board and the representation suggested in the Bill.
9. **Part 3 - Local Authority Domestic Abuse Partnership Boards.** We endorse the need for Local Partnership Boards but recognise that these would be most effective if tasked to deal with all forms of Violence against Women.
10. We endorse the amendments from Ms Harriet Harman et al to ensure that **consent can not be used as a defence to a prosecution in domestic homicides or in cases which result in serious injury.**

Comments and recommendations on the DA Bill generally

- Women with insecure immigration status are routinely denied access to refuge, safe accommodation and other welfare support in order to escape violence and abuse. Due to NRPF conditions, they are faced with the impossible decision of becoming destitute/homeless or returning to the perpetrator. Immigration enforcement has often been prioritised over treating victims as victims and providing health, safety, and security to survivors of domestic abuse. Women should be entitled to protection and support no matter what their immigration status as stated in the Istanbul Convention which the government hopes this bill will enable ratification of. We believe that the Bill fails to tackle the inequalities facing migrant survivors, and that the government has not accepted the recommendations of VAWG organisations led 'by and for' migrant and BME women for reform in this regard. In line with VAWG specialist organisations we agree that the following amendments are vital:
 - **Abolish the no recourse to public funds (NRPF) policy which prevents many migrant women with insecure immigration status from accessing vital, often life-saving support and routes to safety.**
 - **Ensure all survivors, regardless of age or immigration status, are entitled to support, equal access to welfare systems and legal tools that can provide protection from abuse, in accordance with the requirements of the Istanbul Convention which the Bill seeks to ratify.**
 - **Extend eligibility for the existing Domestic Violence (DV) Rule, to ensure all women with insecure immigration status, not only those on spousal visas, are eligible to apply for indefinite leave to remain and the Destitution Domestic Violence Concession (DDVC), and extend the time period for the DDVC to at least six months.**

- **Deliver safe reporting mechanisms which ensure immigration enforcement is kept completely separate from the domestic abuse response and the safety of the victim is paramount.**

- **Provide long-term ring-fenced funding to ensure sustainability of BME and migrant ‘by and for’ specialist services.**

11. In order to ratify the Istanbul Convention the bill must make it clear that women are disproportionately affected by these crimes because they are women, Domestic abuse is a tool of sex based oppression. It is important that all the protected characteristics are supported and that the distinction between sex and gender is clear to protect those in each category. We recommend that the Bill **Acknowledge that domestic abuse disproportionately affects women, because they are women, in line with the UK’s commitments under international law - including the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the Istanbul Convention and the UN Convention on the Rights of Persons with Disabilities (Article 16).**
12. The definitions of ‘personally connected’ used in the definition may not accurately reflect the lived reality for women living with a disability, and it is important to differentiate between intimate partner violence and adult family violence to aid research and establish good practice. We endorse our VAWG specialists recommendation that **The proposed definition be amended to accurately distinguish between, and not conflate, intimate partner abuse with other forms of family abuse, and include abuse perpetrated by unpaid carers of disabled women within the definition of ‘personal connection’.**
13. We welcome that the government will now accept those escaping domestic as in ‘Priority need’ of housing and as already stated believe this must apply to women regardless of their immigration status. Although current guidance does make it clear that a ‘Local Connection’ is not required when fleeing violence, we recognise that this is not applied in all cases. The bill gives a clear opportunity to include this in legislation. **We therefore ask for the Bill to be amended to include a bar on local connection rules for survivors who need to flee their local area to access refuge.**
14. Lack of safe and suitable housing options are severe barriers to survivors’ recovery. Women can face years of housing insecurity after escaping domestic abuse, including placements in unsuitable and unsafe types of accommodation which fail to meet their needs and can expose them to further harm and trauma. There is an urgent need to increase the supply of genuinely affordable housing to ensure survivors can access safe and suitable accommodation, including when moving on from refuge. ‘By and for’ specialist organisations are often the first line of support for marginalised women accessing housing after refuge accommodation; therefore, to address homelessness, the government must invest in the by and for specialist sector to strengthen housing expertise. **We call for the Bill to include a duty on local authorities to ensure that housing allocation for survivors is safe and suitable. This must consider the impact of trauma, physical safety, and additional needs – including suitable accommodation for BME women and disabled women, and the provision of women-only spaces.**
15. The current single payment of universal credit does not enable survivors to access their own money, the provision to ‘ask for’ split payments puts survivors at risk and is not practically possible in most cases where there is domestic abuse. Therefore, **we ask for the Bill to deliver separate payments of Universal Credit by default and that Universal Credit advances are paid as grants to survivors of domestic abuse.**
16. Women in work may find it hard to access support appointments or to balance their working responsibilities when trying to escape abuse. Some employers are flexible, and a supportive

employer can make a huge difference in helping women find safety. **The Bill should require employers to provide flexible working arrangements and a period of paid leave for survivors of domestic abuse.**

17. Disabled survivors and those that are deaf or hard of hearing are further marginalised. Currently the Domestic Violence Easement for Jobseeker's allowance does not apply to women with a disability which would appear to be in contravention of the Equality Act 2010. We suggest that the Bill
 - **Extends the Domestic Violence Easement so it is available to survivors claiming Employment Support Allowance, as well as Job Seekers' Allowance.**
 - **Include a duty to provide British Sign Language and Language Interpreters where necessary at JobCentre Plus offices and to provide accessible means of claiming benefits.**
18. The Bill should place a duty on children's and adult social care to address the barriers faced by disabled mothers experiencing domestic abuse, in order to tackle the discrimination faced by disabled mothers in the child protection system and the family courts. This includes, and is often rooted in, the assumption that a disabled mother cannot be a good enough mother. Stay Safe East (A service for disabled women subjected to Domestic Abuse) report that their clients experience that children's social care frequently sees an abusive father as a preferable option to the children remaining with their disabled mother, regardless of her impairment. The Court may collude with this approach, en/forcing contact between the children and their abusive father and seeing mothers in need of support as problematic. Consequently, disabled mothers are reluctant to ask children's services or adult social care for help, including when they are experiencing domestic abuse. We ask for the Bill to **Place a duty on children's and adult social care to address the barriers faced by disabled mothers experiencing domestic abuse.**
19. Data on Deaf and disabled victims is poor or non-existent at a local level. For example, on average, only 4% of victims referred to local MARACs are identified as disabled people, but in Waltham Forest where Stay Safe East has been working for 10 years, the percentage is between 20 and 24% over the last two years. This shows that early identification and referrals can help identify the true extent of domestic abuse against disabled people. As national data becomes more accurate, it is beginning to show the incidence or severity of domestic abuse against some groups, including Deaf and disabled victims. Currently, local service commissioners rarely consider the need for services to be inclusive of disabled victims, and the model for commissioning (short term and mainly phone contact) often fails disabled victims. The Bill should:
 - **Introduce a public duty to record and report on interventions for and experiences of Deaf and disabled survivors**
 - **Provide long-term ring-fenced funding of user-led specialist services for Deaf and disabled survivors and for the development of new user-led specialist services outside London. Funding must also be provided for all services, refuges, and helplines to ensure they are accessible and meet the needs of Deaf and disabled**
20. We welcome that the government has included a ban on direct cross-examination of domestic abuse survivors by their abuser in the family courts in the Bill. However, we are not assured that survivors will be able to access this protection effectively and fairly if it is subject to an 'evidence test'. The evidence to be included in this provision will be specified in regulations, and we understand that this will broadly replicate the evidence used in the legal aid regime. We know that survivors continue to fall through the gaps when evidence tests are applied; evidence requires disclosing domestic abuse to another professional or service, which many women will never be able to do. We ask that the Bill **Ban direct cross-**

examination in any family, criminal or civil proceedings in all cases involving domestic abuse, sexual abuse, stalking or harassment.

21. Currently the bill allows for access to special measures in the family and civil courts, but only when the court is dealing with a Domestic Abuse Protection Order. This will lead to confusion, with survivors able to access special measures for a DAPO but not in other cases. Its imperative that survivors can access this protection to support them to give best evidence whenever they are in court due to the domestic abuse that they have been subjected to. The Bill is an opportunity to ensure **Access to special measures for survivors of domestic abuse, sexual abuse, harassment or stalking in the family and civil courts.**
22. Decisions about child welfare should always put the best interests of the child as a priority. Practice Direction 12J states that “the court must in every case consider carefully whether the statutory presumption applies, having particular regard to any allegation or admission of harm by domestic abuse to the child or parent or any evidence indicating such harm or risk” Previous FiLiA speaker, Professor Shazia Choudhry’s research [What about my right not to abused?](#) showed that this guidance is consistently undermined, and the presumption of contact is routinely prioritised above the child’s best interests in cases of domestic abuse. FiLiA is concerned that this ‘pro-contact’ approach leads to potentially unsafe contact decisions being made and can result in serious safeguarding concerns. Women’s Aid’s [19 Child Homicides](#) research uncovered the tragic cases of 19 children and two women in 12 families who were killed by known perpetrators of domestic abuse in circumstances related to unsafe child contact from 2005-2015. They found that in the cases where contact was arranged through the courts, abuse of the mother was often seen as a separate issue from the child’s safety and wellbeing, rather than the two being intrinsically linked. FiLiA welcomes the Ministry of Justice’s announcement of a review into how the family courts protect children and parents in cases of domestic abuse and other serious offences. We feel that the Domestic Abuse Commissioner and other Specialist organisations (Women’s Aid, #TheCourtSaid etc) should be consulted as part of the review. But the Bill can also be instrumental in improving safety with the following recommendations:
 - **End the presumption of contact in cases where children are at risk of harm from domestic abuse, with contact arrangements in domestic abuse cases based on informed judgement of a child’s best interests and safety.**
 - **Prohibit unsupervised contact for a parent waiting for trial, or on bail for, a domestic abuse related offence, or where there are ongoing criminal proceedings for domestic abuse.**
 - **Amend the proposed definition of domestic abuse to make clear that children experience domestic abuse, and the Children Act 1989 needs to name coercive control as ‘harm to children’.**
23. Family court orders, particularly location orders, are often applied for by fathers when mothers and children have fled the family home to refuges following allegations of domestic abuse. In such cases the highly confidential location of the refuge is given to the family courts, clearly this has huge risks to the safety of women and their children. We call on the Bill to:
 - **Prevent the service of family court orders on refuge residential addresses.**
 - **Ensure that refuge residential addresses and the identity of refuge workers remain confidential.**
24. There are a number of concerns around the details of the proposed DAPO, including: the workability of the proposed arrangements for notifying perpetrators; uncertainties around which third parties might apply for DAPOs without victim consent; and the implications that such applications will have. There are clear steps the government can take to address these,

but there must also be a transparent and thorough review of DAPOs. It is essential for this review to have input from the Domestic Abuse and Victim's Commissioners, specialist domestic abuse sector and survivors, and that this review is given appropriate consideration before any national roll out. We therefore urge for the Bill to:

- **Ensure survivors' voices are heard within the DAPO process, establish robust procedures for monitoring compliance and positive requirements, and ensure the strict nature of notification requirements does not impact on judges' decision as to whether to impose a DAPO.**
 - **Require a transparent and thorough review of DAPOs with expert and lived experience input before a national roll out.**
25. We will never end Domestic Abuse unless we have a coherent plan to hold perpetrators accountable. We have had some successes within certain parameters with approached such as respect accredited perpetrator programmes and the DRIVE project but also some concerns around the safety of short-term perpetrator interventions and conditional cautioning. We need a more joined up approach and call for the government **to design and fund a national Domestic Abuse Perpetrator Strategy.**
26. The needs of those who have been subjected to domestic abuse in same sex relationship are different and they face specific barriers to support, that are best provided by services that understand and support LGB people. It is important for woman survivors and especially for Lesbians that single sex services are easily accessible. Equally survivors from the Trans community have needs and barriers to support and are best supported by services designed to understand and meet their needs. We ask that the **bill ensures that any legislation, policy and commissioning arising from the measures of the Bill clearly recognises and responds to the needs, experiences and distinct barriers that both LGB and Trans survivors face in accessing support.**
27. The distinction between sexual violence and domestic abuse is not simply a matter of semantics. Although domestic abuse and sexual violence are both forms of violence against women, which can overlap, survivors require different specialist services. Despite acknowledging sexual violence as an integral aspect of domestic abuse, the Bill fails to recognise this important distinction in needs. As a result, sexual violence specialist support services are absent from the Bill. Service users are referred to Rape Crisis Centres for specialist counselling and advocacy. These referrals come from statutory services, including the police, and social services, as well as domestic violence charities; however, these referrals are unfunded. We therefore call for the Bill to **Provide long-term ring-fenced funding to specialist sexual violence and abuse services delivering specialist counselling and advocacy to victims and survivors who suffer sexual violence and abuse within a domestic abuse setting.**
28. Survivors of domestic abuse are likely to come into contact with a range of publicly funded services, from the health system to social services, throughout their lives. These services have a vital role to play in recognising the signs of abuse and ensuring survivors get the support they need. The [Pathfinder Project](#) provides a great learning resource for health professionals to respond effectively to domestic abuse but when the Government responded to the pre-legislative committee's recommendation on early intervention and training for frontline staff, they said that routine enquiry – whereby trained practitioners routinely ask patients about experiences of abuse – is already in place in services such as mental health and maternity. Unfortunately, research carried out by Agenda found that this often doesn't happen in practice, there is still work to do: A third of mental health trusts who responded to an FOI did not even have a policy on routine enquiry. Where trusts did have policies on routine enquiry, the effectiveness of these policies varied considerably, with one trust asking just 3 per cent of

patients about experiences of domestic abuse – when they should be asking everyone, particularly as over two thirds of women who have a mental health problem have experienced domestic abuse. We recommend the government **create a public duty on publicly funded services to enquire into current and historic domestic abuse and sexual violence as standard practice, with learnings from the Welsh legislation incorporated.**

29. The accompanying non-legislative package to the Bill must include specific provision for the response to domestic abuse within the NHS, including embedding evidence-based interventions that combine training for professionals with specialist support for patients. For example, [IRIS](#) is a general practice based domestic abuse training, support and referral programme which has been positively evaluated in a randomised controlled trial, and found to increase both identification of domestic abuse and referral to support services. Such interventions are vital when we know that almost half a million patients affected by domestic abuse look for help from health care professionals. Many of these patients will be presenting within general practice and will not get the support they seek. Adult social care also has a potentially key role to play in identifying disabled survivors and signposting them to support. We therefore call for the Bill to include:
- **A duty to fund evidence-based interventions in health that effectively support survivors who come forward from enquiry.**
 - **A duty on health and social care professionals to ensure safeguarding procedures are used to protect survivors and to ensure they get the support they need and do not place survivors at further risk**
30. We are concerned that Section 76 of the Serious Crime Act 2015 discriminates both directly and indirectly against disabled victims for the following reasons: • The ‘best interest’ defence is likely to be used when referring to disabled victims where the abuser is a ‘carer’ who can claim they have the victim’s best interests at heart; • The defence is most likely to be used in relation to people who have learning disabilities or cognitive impairments, mental health issues, are neuro-diverse or have communication issues and who may have – or be seen to have – capacity issues. This defence may cover an alleged lack of capacity to consent before, during or after the offence or pattern of coercive control. This clause has the potential to prolong the abuse of disabled victims, to prevent victims getting justice and disadvantages disabled victims of coercive control and those lacking the capacity to consent. We therefore urge for the Bill to **Repeal the discriminatory ‘carer’s defence’ clause in the 2015 Serious Crime and Domestic Violence Act (Part 5, Section 76).**
31. Given the repeat nature of virtually all domestic abuse-related crimes, bail conditions are an essential measure of protecting and safeguarding victims whilst an investigation is ongoing. Unfortunately following reforms to pre-charge bail in the Policing and Crime Act 2017, the use of bail has reduced by 65% and highly dangerous offenders are being released while investigations are ongoing without basic bail conditions, such as not to contact the victim or go to her home. The pre-charge bail regime introduced in April 2017 established an initial bail period for 28 days only, with any extensions requiring approval by a Superintendent. This is an onerous burden on the police, which has resulted in the avoidance of bail use altogether – forces are commonly either releasing suspects under investigation (RUI) or interviewing them on a voluntary attendance, when bail is not available. In addition, when bail conditions are not imposed, we hear that the police are advising victims to obtain a non-molestation order through the civil courts. This places the burden of obtaining protection onto victims themselves, rather than the state, which has a duty to protect. The government’s consultation on revising the Act is welcome, however there are swift changes that can be made now to ensure pre-charge bail is routinely used in domestic abuse and sexual offences cases to

safeguard victims. We therefore urge for the Bill to: **Extend the initial bail period to 3 months, reverse the presumption in favour of pre-charge bail in all domestic abuse and sexual offences cases, and require police to use a DAPO when pre-charge bail is breached.**

32. It is widely recognised that non-fatal strangulation and asphyxiation (eg. suffocation with a pillow) are a common feature of domestic abuse. Strangulation and asphyxiation are the second most common method of killing in female homicides: 29% as compared to only 3% of male homicides. In addition, research highlights how non-fatal strangulation is frequently used as a tool to exert power and control, and to instil fear, rather than being a failed homicide attempt. There is currently no distinct offence of non-fatal strangulation or asphyxiation and it can be difficult to prove intent for an offence of attempted murder. In the majority of cases prosecutions can only be brought for an assault offence. The lack of observable injuries means that offenders' conduct is often minimised, and they are charged with common assault rather than with actual bodily harm (ABH). We therefore call for the Bill to **Introduce a new criminal offence of non-fatal strangulation.**
33. Threats to share intimate images are being used by abusers to coerce, control, and frighten survivors both during relationships and following separation. Threats are having chronic, long-term impacts on some survivors, with many feeling like there is no escape due to threats to share a private sexual photo or video of them online, with friends and family, their new partner, or their employer, hanging over them. However, while the actual sharing of such images was criminalised in 2015 as part of the Criminal Justice and Courts Act (colloquially known as the 'revenge porn' offence), threats to share were not, although both the disclosure and threats are offences in Scotland. This means that when survivors approach the police about the threats, they are told to wait until their abuser shares the photo or film and come back, as only then is it a police issue. This is unacceptable and fails to recognise that the threat itself is being used as a powerful tool of coercive control and abuse. We therefore call for the Bill to **Extend the law on the non-consensual sharing of intimate images or films to include threats to disclose such images or films.**
34. In addition to the points above FiLiA supports and endorses the campaigns from the following groups:
 - [Step Up Migrant Women Coalition](#) led by the Latin American Women's Rights Service.
 - Southall Black Sister's [#ProtectionForAll](#) campaign, including a comprehensive strategy on violence against and abuse of migrant women.
 - [Rights of Women's](#) campaign to improve victims' and survivors' access to legal aid.
 - Imkaan's [Alternative Bill](#), which outlines a response to VAWG that is gendered and intersectional.
 - [Surviving Economic Abuse's](#) call to extend the offence of controlling or coercive behaviour in the Serious Crime Act to post-separation abuse.
 - [Drive's](#) call for the government to publish and fund a new Domestic Abuse Perpetrator Strategy.
 - [Prison Reform Trust's](#) call for an introduction of a statutory defence for domestic abuse victims compelled to offend by their abusers.
 - [Stay Safe East's](#) briefing and recommendations for disabled survivors.
 - Agenda's [Ask and Take Action](#) campaign.

In summary FiLiA's recommendations are:

- **Consent can not be used as a defence to a prosecution in domestic homicides or in cases which result in serious injury.**
- **Abolish the no recourse to public funds (NRPF) policy which prevents many migrant women with insecure immigration status from accessing vital, often life-saving support and routes to safety.**
- **Ensure all survivors, regardless of age or immigration status, are entitled to support, equal access to welfare systems and legal tools that can provide protection from abuse, in accordance with the requirements of the Istanbul Convention which the Bill seeks to ratify.**
- **Extend eligibility for the existing Domestic Violence (DV) Rule, to ensure all women with insecure immigration status, not only those on spousal visas, are eligible to apply for indefinite leave to remain and the Destitution Domestic Violence Concession (DDVC), and extend the time period for the DDVC to at least six months.**
- **Deliver safe reporting mechanisms which ensure immigration enforcement is kept completely separate from the domestic abuse response and the safety of the victim is paramount.**
- **Provide long-term ring-fenced funding to ensure sustainability of BME and migrant 'by and for' specialist services.**
- **Acknowledge that domestic abuse disproportionately affects women, because they are women, in line with the UK's commitments under international law - including the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the Istanbul Convention and the UN Convention on the Rights of Persons with Disabilities (Article 16**
- **The proposed definition be amended to accurately distinguish between, and not conflate, intimate partner abuse with other forms of family abuse, and include abuse perpetrated by unpaid carers of disabled women within the definition of 'personal connection'.**
- **Include a bar on local connection rules for survivors who need to flee their local area to access refuge.**
- **Include a duty on local authorities to ensure that housing allocation for survivors is safe and suitable. This must consider the impact of trauma, physical safety, and additional needs – including suitable accommodation for BME women and disabled women, and the provision of women-only spaces.**
- **Deliver separate payments of Universal Credit by default and that Universal Credit advances are paid as grants to survivors of domestic abuse.**
- **Require employers to provide flexible working arrangements and a period of paid leave for survivors of domestic abuse.**
- **Extends the Domestic Violence Easement so it is available to survivors claiming Employment Support Allowance, as well as Job Seekers' Allowance.**
- **Include a duty to provide British Sign Language and Language Interpreters where necessary at JobCentre Plus offices and to provide accessible means of claiming benefits.**
- **Place a duty on children's and adult social care to address the barriers faced by disabled mothers experiencing domestic abuse**

- Introduce a public duty to record and report on interventions for and experiences of Deaf and disabled survivors
- Provide long-term ring-fenced funding of user-led specialist services for Deaf and disabled survivors and for the development of new user-led specialist services outside London. Funding must also be provided for all services, refuges, and helplines to ensure they are accessible and meet the needs of Deaf and disabled
- Ban direct cross-examination in any family, criminal or civil proceedings in all cases involving domestic abuse, sexual abuse, stalking or harassment.
- Access to special measures for survivors of domestic abuse, sexual abuse, harassment or stalking in the family and civil courts
- End the presumption of contact in cases where children are at risk of harm from domestic abuse, with contact arrangements in domestic abuse cases based on informed judgement of a child's best interests and safety.
- Prohibit unsupervised contact for a parent waiting for trial, or on bail for, a domestic abuse related offence, or where there are ongoing criminal proceedings for domestic abuse.
- Amend the proposed definition of domestic abuse to make clear that children experience domestic abuse, and the Children Act 1989 needs to name coercive control as 'harm to children'.
- Prevent the service of family court orders on refuge residential addresses.
- Ensure that refuge residential addresses and the identity of refuge workers remain confidential
- To design and fund a national Domestic Abuse Perpetrator Strategy.
- Ensure that any legislation, policy and commissioning arising from the measures of the Bill clearly recognises and responds to the needs, experiences and distinct barriers that both LGB and Trans survivors face in accessing support.
- Provide long-term ring-fenced funding to specialist sexual violence and abuse services delivering specialist counselling and advocacy to victims and survivors who suffer sexual violence and abuse within a domestic abuse setting.
- create a public duty on publicly funded services to enquire into current and historic domestic abuse and sexual violence as standard practice, with learnings from the Welsh legislation incorporated.
- A duty to fund evidence-based interventions in health that effectively support survivors who come forward from enquiry.
- A duty on health and social care professionals to ensure safeguarding procedures are used to protect survivors and to ensure they get the support they need and do not place survivors at further risk
- Repeal the discriminatory 'carer's defence' clause in the 2015 Serious Crime and Domestic Violence Act (Part 5, Section 76).
- Extend the initial bail period to 3 months, reverse the presumption in favour of pre-charge bail in all domestic abuse and sexual offences cases, and require police to use a DAPO when pre-charge bail is breached.
- Introduce a new criminal offence of non-fatal strangulation.
- Extend the law on the non-consensual sharing of intimate images or films to include threats to disclose such images or films.