

Written evidence: House of Commons Public Bill Committee on the Domestic Abuse Bill

June 2020

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Introduction

The Equality and Human Rights Commission has been given powers by Parliament to advise Government on the equality and human rights implications of laws and proposed laws and to publish information or provide advice, including to Parliament, on any matter related to equality, diversity and human rights.

The Domestic Abuse Bill is intended to be a 'once-in-a-generation opportunity to transform the response' to this crime, which disproportionately impacts women and girls. The Commission warmly welcomes the opportunity the Bill presents to ensure better support and protection for survivors of domestic abuse in England and Wales. However, we consider that significant changes to the Bill are required for it to be the transformative legislation the Government aims it to be and to ensure UK compliance with the Convention on Preventing and Combatting Violence against Women and Domestic Violence (the Istanbul Convention) and with the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW).

The coronavirus pandemic, which has led to increases in this abuse¹ and thrown the problem into sharp relief, makes these long-term, transformative changes more necessary than ever.

We recommend changes to the Bill in three priority areas to ensure:

- 1. Adequate, properly funded specialist services, provided both in safe accommodation and in the community, and available to all without discrimination.** We recommend support for an amendment to the Bill that would ensure: properly funded specialist services based in both safe accommodation (such as refuges) and in the community, together with a non-discrimination principle that would ensure that support and protection are

¹ iNews (April 2020), [Domestic abuse deaths during coronavirus lockdown are three times higher than last year, statistics show](#); BBC (April 2020), [UK lockdown: Calls to domestic abuse helpline jump by half](#).

available to all survivors without discrimination. See proposed draft amendment text attached as Appendix 1 to this briefing.

2. Equal protection for migrant survivors. In addition to the non-discrimination principle described above, we recommend support for amendments to the Bill to ensure:

- Safe reporting for migrant survivors;
- Extension of the Domestic Violence Rule and Destitute Domestic Violence Concession;
- Access to public funds for migrant survivors.

3. Removal of barriers to justice in civil and family matters. We recommend the automatic prohibition on cross-examination in person should be available in all cases where allegations of domestic abuse are raised, and that it should be available to survivors across criminal, family and civil courts. The automatic provision of special measures should also be available across criminal, family and civil courts.

Commission's Recommendations

1. Specialist services, fully funded, available without discrimination

We recommend that the Bill is amended to ensure adequate service provision, properly funded, and provided to all survivors without discrimination, including survivors with insecure immigration status. Working together with ERAW, Safe Lives and Barnardo's and in consultation with the specialist children's and violence against women and girls (VAWG) sector, the Commission has developed a proposed amendment to the Bill to this effect. See Appendix 1 for the full text of the proposed amendment.

Why is this amendment needed?

- *To ensure adequate service provision and funding*

Clause 53 of the Bill places a statutory duty on local authorities to provide accommodation-based services. This is a welcome step forward. However, this is a narrow duty that only assists survivors in refuges or other safe accommodation and does not address the needs of the majority (70%) of survivors who seek help for domestic abuse in the community, rather than in refuges.² There is also a risk that a narrow duty to provide accommodation-based services only could incentivise local authorities with limited resources to divert vital funds away from services provided in the community (such as advocacy, IDVA and outreach services; dedicated children's services) to meet the duty. The Bill therefore must include a statutory duty that covers both accommodation-based and non-accommodation based services.

Further, the Bill as currently drafted includes no provisions for adequate funding for survivor services. Prior to the coronavirus pandemic, domestic abuse organisations faced serious funding difficulties, and these funding difficulties were disproportionately experienced by specialist and often small organisations led by and for women with intersecting protected characteristics. A University of Lancaster study reported that: "by far the most commonly cited gap in funding and provision was for dedicated BME VAWG services."³ The study also raised concern about limited provision for LGBT survivors and disabled survivors. The coronavirus pandemic has both highlighted long-standing inequalities faced by BME people and other protected groups, and exacerbated the issues faced by small specialist organisations,⁴ meaning that long-term adequate funding is now more important than ever.

² Safe Lives (2020), [Briefing for the Second Reading of the Domestic Abuse Bill](#).

³ University of Central Lancashire (2018), [Scoping Study: Violence Against Women and Girls Services 2018, Connect Centre for International Research on Violence and Harm](#), p.21. See also: Imkaan (2016), [Capital Losses: the State of the Specialist BME Ending Violence Against Women and Girls sector in London](#). Stay Safe East (2020), [Domestic Abuse Bill Briefing](#).

⁴ Specialist VAWG Organisations Statement (May 2020), [Recommendations for Government emergency funding \(announced 2 May 2020\) for VAWG work during the Covid-19 pandemic](#).

- *To ensure non-discrimination in the provision of domestic abuse protection and support*

The Bill currently offers no protection or support to migrant survivors with insecure immigration status. Migrant survivors, especially those whose immigration status means they are subject to the no recourse to public funds (NRPF) condition, face particular barriers in accessing support for domestic abuse, including refuge spaces.⁵ Without access to public funds they are not eligible for welfare benefits, which are required to cover the accommodation costs of a refuge place. Migrant survivors are less likely to seek help for fear of deportation and the threat of immigration enforcement is in itself used by perpetrators as a form of coercive control.

Government has committed to implement the findings of the Williams Windrush Review and develop a fairer and more compassionate immigration system. We consider that the Bill must ensure protection and support for all survivors without discrimination, and that such an approach is required by the UK's international human rights obligations under CEDAW and under the Istanbul Convention, which the government has committed to ratify. We set out below our support for additional changes to the Bill which would improve protections for migrant survivors, but we consider it vital that, in addition to these specific protections, the Bill include a clear non-discrimination principle, as required by Article 4 (3) of the Istanbul Convention.⁶ Such a clause would ensure that all survivors regardless of immigration status, or other characteristics such as age, would be entitled to access support and protection from domestic abuse.

How would the amendment address these issues?

Clause numbers below refer to the text of the proposed amendment in Appendix 1 of this briefing and would have the following effect:

⁵ Bates, L., Gangoli, G., Hester, M. and Justice Project Team (2018), [Policy Evidence Summary 1: Migrant Women](#), University of Bristol, Bristol.

⁶ Article 4(3) of the [Istanbul Convention](#) states that the provisions in the treaty “shall be secured without discrimination on any ground such as sex, gender, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, sexual orientation, gender identity, age, state of health, disability, marital status, migrant or refugee status, or any other status.”

New Clause 3 (1) places a duty on the Home Secretary to take steps to ensure equally effective protection and support for all victims of domestic abuse, irrespective of their status, with regard to four specific outcomes: prevention; access to services; access by perpetrators to accredited programmes; raising awareness of the Act. Status is defined with reference to Article 4 (3) Istanbul Convention which includes sex, race, sexual orientation, gender identity, age, and migrant or refugee status. **New Clauses 3(2) and 3(3)** require the Home Secretary to take steps to ensure continuous improvement in these outcomes. **New Clause 3 (2)** also covers funding, as set out further below.

New Clause 3 (4) places comprehensive duties on all relevant public authorities to commission specialist services for everyone affected by domestic abuse. Specialist services include both accommodation-based and community-based services, and the clause requires these services to be provided to all who need them, regardless of their status, including survivors with insecure immigration status, children, and perpetrators (to prevent reoffending).

New Clause 3 (5) (children & perpetrator programmes) specifically requires public authorities to ensure that these services are provided to:

- All adult and child victims who remain in the community, at home or in accommodation-based services;
- Children under 18 who are in an abusive relationship; and
- Perpetrators, to prevent re-offending.

New Clause 3 (6) adds an accountability measure into the clause, by requiring the Home Secretary to lay before Parliament a strategic plan. Any such strategic plan must take into account any existing broader strategy to end violence against women and girls.

2. Safe reporting for migrant survivors

We recommend the Bill should be amended to prevent the personal data of migrant survivors of domestic abuse from being shared by providers of accommodation, banking services, education, employment, financial assistance, healthcare and policing services for immigration purposes without the express consent of the survivor.

Why is this amendment needed?

We consider that it is inappropriate for survivors accessing support for domestic abuse to have their information shared for the purposes of immigration enforcement. Such information-sharing acts as a deterrent on survivors from reporting crimes and seeking the support of these services. Further, as highlighted above, the threat of immigration enforcement is in itself used by perpetrators as a form of coercive control. The CEDAW Committee has called on states, in the context of gender-based violence, to repeal "...restrictive immigration laws that discourage women, including migrant domestic workers, from reporting this violence...".⁷ With respect to the UK in particular, the CEDAW Committee recommended in March this year that "asylum-seeking women, migrants and women with insecure immigration status are able to seek effective protection and support services without fear of having their immigration status reported to authorities."⁸ We therefore recommend that the Bill prohibits the sharing of survivors' personal data for the purposes of immigration enforcement where the data was collected in the course of the person accessing assistance or support for domestic abuse.

3. Extension of Domestic Violence Rule to all migrant survivors

We recommend the Bill is amended to ensure all migrant survivors of domestic abuse in the UK can apply for indefinite leave to remain under the Domestic

⁷ CEDAW, General Recommendation 35, para 31(c).

⁸ CEDAW, 'Concluding observations on the eight periodic report of United Kingdom of Great Britain and Northern Ireland', Advance Unedited Version, CEDAW/C/GBR/CO/8, 14 March 2019, p. 7.

Violence Rule (an immigration application); and to extend the scope of the destitute domestic violence concession accordingly.

Why is this amendment needed?

Many migrant survivors of domestic abuse are excluded from various public funds (including various welfare benefits and social services). This may be because they have limited leave to enter or remain subject to the NRPF condition, or because they do not have leave to enter or remain. They are effectively prohibited from accessing refuge spaces, which require housing benefit to cover the accommodation costs of a stay. Women's Aid's No Woman Turned Away project, which supports women who face barriers accessing refuge spaces, recently found that only 11.7% of women with NRPF involved in this project were accommodated in a suitable refuge.⁹

Many therefore face an impossible choice of remaining with an abuser or facing destitution and homelessness if they try to leave, and this is further used as tool of coercive control by perpetrators.

The government has recognised that there is an issue for migrant survivors¹⁰ and have undertaken a review into "what support can be provided to migrant victims of domestic abuse".¹¹ The results of this review have still not been published, and while a £1.5m pilot fund has been promised later in the year,¹² no further details on this are available, including who would be able to access this fund and how. We are concerned that this piecemeal approach does not take on board the serious and urgent concerns raised during the pre-legislative scrutiny phase of the Bill.¹³

⁹ Women's Aid (2019), [Nowhere to Turn: Findings from the Third Year of the No Woman Turned Away Project](#), p.30

¹⁰ Victoria Atkins, Parliamentary Under Secretary of State for the Home Department, [Second reading of the Domestic Abuse Bill](#), Hansard, HC Deb. Vol 675, Col 299, 28 April 2020.

¹¹ HM Government (March 2020) "[Enhanced Domestic Abuse Bill Introduced to Parliament](#)".

¹² Victoria Atkins, Parliamentary Under Secretary of State for the Home Department, [Second reading of the Domestic Abuse Bill](#), Hansard, HC Deb. Vol 675, Col 299, 28 April 2020.

¹³ House of Lords, House of Commons, Joint Committee on the Draft Domestic Abuse Bill, [First Report of Session 2017-19, HL Paper 378, HC 2075](#), 11 June 2019, paras 232 – 259.

The Domestic Violence Rule (DV Rule) – an application under the Immigration Rules - provides a way out for survivors of domestic abuse on a spousal visa, allowing them to regularise their status by applying for indefinite leave to remain. Southall Black Sisters, who work with survivors with NRPF, states that it is a model of protection that is currently working well for those on spousal visas.¹⁴ However, it is not available to survivors on other visas or no visa, leaving them with no way out.

The Destitute Domestic Violence Concession (DDVC) permits survivors applying under the DV Rule three months' temporary access to public funds, as well as allowing them to enter into employment. However, the three-month time limit is a barrier to women in obtaining accommodation, accessing support and obtaining legal advice and representation to make an application.¹⁵ Further, as it is linked to the DV Rule, the DDVC is limited to those on spousal visas.

We therefore recommend that eligibility to apply under the DV Rule should be extended to all survivors of domestic abuse with insecure immigration status, not just those on spousal visas. The DDVC should be extended from three to six months, and it should, like the DV Rule, be available to all migrant survivors of domestic abuse with insecure immigration status, not just those on spousal visas. This would provide a route to regularising immigration status for all survivors of domestic abuse, and allow them to access refuge space and welfare support whilst applying through this route.

4. Access to public funds for migrant survivors

We recommend the Bill is amended to remove, for survivors of domestic abuse who can provide evidence that domestic abuse has occurred, the statutory exclusions that prevent access to public funds for people with insecure immigration status.

¹⁴ Step Up Migrant Women Coalition (May 2020), Joint Submission to the Domestic Abuse Bill Committee.

¹⁵ Southall Black Sisters (2019), 'The Domestic Abuse Bill: A Briefing Paper by Southall Black Sisters'.

Why is this amendment needed?

As set out under section 3 above, migrant survivors who are subject to the NRPF condition due to having insecure immigration status face the choice of remaining with the perpetrator or facing destitution due to being unable to access welfare support or a refuge space.

We recommend an amendment that would remove the statutory exclusions that prevent access to the bare minimum of support and assistance that survivors need; and ensure that no survivor, regardless of immigration status, is treated as being in breach of immigration laws or the immigration rules by reason of accessing that support or assistance.¹⁶

5. Special measures for survivors in family and civil courts

We recommend the Bill is amended to ensure automatic provision of special measures for survivors of domestic abuse in the family and civil courts.

Why is this amendment needed?

Clause 58 of the Bill provides for the automatic provision of special measures to domestic abuse survivors in the criminal court. However, the Bill does not extend this automatic provision to survivors in the family or civil courts.

Special measures can include separate waiting rooms, separate entrance and exit times for the parties, screens and video-links; these serve to protect the survivor and go some way to reducing the re-traumatising effect of the court process.

Whilst the Family Procedure Rules give the court discretion to order special measures where a party's participation in proceedings and the quality of their

¹⁶ The government has obligations to prevent inhuman and degrading treatment, including by reason of imminent lack of resources, under Article 3 European Convention on Human Rights, and the High Court recently found that the NRPF regime may breach this obligation (see [R \(W, a child by his litigation friend J\) v SSHD, \[2020\] EWHC 1299 \(Admin\)](#)). We note that the government also has obligations under Article 3 to protect victims from domestic abuse (see eg. *Opuz v Turkey* (2009), Application no. 33401/02), which may also be breached if survivors are forced to stay with perpetrators to avoid destitution because they are subject to an NRPF condition.

evidence is likely to be diminished by reason of vulnerability, it is widely reported that special measures in the family court are not being provided often enough, and, when they are provided, they are often inadequate.

Recent Women's Aid research reported that 61% of domestic abuse survivors had not had any form of special measures in the family court.¹⁷ Of the 35% who had accessed some type of special measure, the measures were only in place in some of the hearings they attended, rather than all.¹⁸ The Women's Aid research also revealed inconsistent judicial attitudes where requests for special measures are made.¹⁹ MoJ research commissioned on this issue also specifically highlights varying and inconsistent judicial views on special measures.²⁰ Prominent members of the judiciary have long been calling for protections for victims of domestic abuse in the family courts to be aligned with those in the criminal courts²¹ and yet witnesses to the draft Bill Committee in May this year gave evidence that special measures in the family courts were still "not satisfactory or on a par with those facilities available in the criminal courts."²² The Draft Bill Committee called for a "single consistent approach" to be taken across all criminal and civil jurisdictions.²³

We welcome the Government's recognition, in its most recent response to the draft Bill Committee, of "the importance of ensuring that all victims and vulnerable witnesses are able to participate fully in court proceedings" and note that they will be considering the findings and recommendations of the review currently underway by the MoJ family justice panel as well as the recommendations of the recent report by the Civil Justice Council.²⁴ However, we consider that there is already sufficient

¹⁷ Women's Aid (2018) "[What about my right not to be abused? Domestic abuse, human rights and the family courts](#)".

¹⁸ Ibid.

¹⁹ Ibid, p.28.

²⁰ N. E. Corbett and A. Summerfield (2017), [Alleged perpetrators of abuse as litigants in person in private family law: The cross-examination of vulnerable and intimidated witnesses](#), Ministry of Justice Analytical Series, Section 4.2.

²¹ See for example, [Cobb J \(November 2018\), Review of Practice Direction 12J FPR 2010, Child Arrangement and Contact Orders: Domestic Violence and Harm, Report to the President of the Family Division](#) (in particular paragraphs 15-18).

²² House of Lords, House of Commons, Joint Committee on the Draft Domestic Abuse Bill, [First Report of Session 2017-19, HL Paper 378, HC 2075](#), 11 June 2019, para 140.

²⁴ Secretary of State for the Home Department (2020) [Further Government response to the report from the Joint Committee on the draft Domestic Abuse Bill](#).

evidence that extension of special measures to the family and civil courts is urgently needed and are concerned this delay will mean the Bill fails to address this vital and longstanding concern.

We therefore continue to recommend that the presumption of eligibility for special measures for victims of domestic abuse be extended to the family courts and the civil courts.

6. Extension of prohibition on cross-examination in person

We recommend that the Bill is amended to ensure that the automatic prohibition of cross-examination in person of a victim by a perpetrator applies to all cases where allegations of domestic abuse are raised, and is extended to the civil courts as well as the family courts, to ensure protection is extended no matter where victims have to face their perpetrators in litigation.²⁵

Why is this change to the Bill needed?

Cross-examination in person in cases where domestic abuse is an issue is well-recognised as being re-traumatising for survivors²⁶ and a means by which perpetrators can continue their abuse.²⁷ It remains a significant problem for domestic abuse survivors in the family courts, with a recent survey by Women's Aid finding that 24% of respondents had been cross-examined by a perpetrator.²⁸

We therefore welcome that, in this new Bill, the automatic prohibition of cross-examination in person of a victim by a perpetrator has been widened to apply where the survivor can provide "specified evidence."²⁹ "Specified evidence" has not yet

²⁵ [Letter from Rt Hon Harriet Harman MP, Chair of the Joint Committee on Human Rights, to Victoria Atkins MP, and Edward Argar MP](#), 10 April 2019.

²⁶ [All-Party Parliamentary Group on Domestic Violence, Domestic Abuse, Child Contact and the Family Courts, 2016](#), p 4; and [House of Commons Home Affairs Committee, Domestic Abuse: Government Response to the Committee's Ninth Report of Session 2017–19, 7 May 2019, HC 2172 of session 2017–19](#), p 7.

²⁷ Rights of Women, Written Evidence to the Joint Committee on Human Rights on the draft Domestic Violence and Abuse Bill, 15 February 2019, para 3.

²⁸ Women's Aid, "[What about my right not to be abused? Domestic abuse, human rights and the family courts](#)", 2018.

²⁹ Section 59, [Domestic Abuse Bill](#).

been defined, although we note the commitment in the explanatory notes to the Bill that “specified evidence” is intended to broadly replicate the list of evidence that is currently specified for the purposes of accessing civil legal aid. However, there can be difficulties for survivors in evidencing their abuse, as shown by recent Ministry of Justice research.³⁰ These difficulties include language barriers, unwillingness of organisations, and health professionals in particular, to write letters and the fact that a survivor may not have disclosed their abuse at the time to a relevant organisation.³¹ The Commission considers that no survivor should be subject to cross-examination in person by an alleged perpetrator and so recommends that this be extended to all cases where domestic abuse is raised.

Further, the Bill does not currently extend the automatic prohibition to the civil courts, despite the fact that such an extension was specifically recommended by the Civil Justice Council.³² As stated above, we note that the government is carefully considering the Civil Justice Council recommendations but we urge the government not to delay in ensuring consistency across criminal, family and civil courts.

³⁰ Ministry of Justice (2017), Farai Syposz, [Research investigating the domestic violence evidential requirements for legal aid in private family disputes](#), pp. 2-3, cited in Justice (April 2020), Domestic Abuse Bill Second reading briefing.

³¹ Ibid.

³² Civil Justice Council (February 2020), [Vulnerable Witnesses and Parties within Civil Proceedings: Current Position and recommendations for change](#): see recommendation 8, p.127.

Appendix 1 – Proposed amendment on services, funding and non-discrimination

Duty to commission specialist support and services

Explanatory statement

This amendment would establish a clear statutory duty on public authorities in England and non-devolved authorities in Wales to commission specialist domestic abuse support and services for all persons affected by domestic abuse regardless of status. It is underpinned by a corresponding duty on the Secretary of State to ensure sufficient funding for the implementation of this duty. The duty will apply to all who are affected by domestic abuse including those with insecure immigration status, children and young people. It will also include the commissioning of perpetrator programmes.

In relation to children, the amendment clearly sets out that specialist age appropriate domestic abuse support services are required. It also requires the provision of specialist services for children whether they are living in a household where there is domestic abuse or experiencing domestic abuse in their own personal relationship.

As part of this duty, the Secretary of State will ensure that sufficient funding is allocated on a three year basis to ensure public authorities can meet their statutory duties in the New Clause.

Amendment

In Chapter 1, after Clause 2 of the Domestic Abuse Bill, insert the following new clause –

New Clause 3

Secretary of State's General Duty

1. The Secretary of State must take steps to ensure equally effective protection against domestic abuse and support for all victims of domestic abuse irrespective of their status including steps aimed at ensuring that:
 - a. domestic abuse is prevented;
 - b. all victims of domestic abuse receive protection and access to specialist services;
 - c. all perpetrators of domestic abuse are able to access accredited perpetrator programmes;
 - d. awareness of this Act is promoted.
2. In discharging the duty under section [1] the Secretary of State must –
 - a. Ensure that sufficient funding is provided annually to ensure that relevant public authorities can meet their statutory duties under Clause [4]; and
 - b. take steps to ensure continuous improvement in the outcomes that are achieved.
3. The outcomes referred to in subsection (b) of section [2] include, in particular, outcomes which demonstrate —
 - a. adequate and effective steps aimed at ensuring that domestic abuse is prevented;
 - b. adequate and effective protection and support for persons, including children, against domestic abuse irrespective of their status;
 - c. adequate and effective services to all adult and child victims of domestic abuse irrespective of their status;
 - d. adequate and effective access for all perpetrators to accredited perpetrator programmes; and
 - e. adequate and effective steps to promote awareness of this Act.

Commission specialist domestic abuse support services for victims and perpetrators of domestic abuse

4.
 - a. It is the duty of relevant public authorities in England and non-devolved public authorities in Wales to commission sufficient specialist services for all persons affected by domestic abuse regardless of status.
 - b. To ensure compliance with the duty under (a) public authorities must:
 - i. regularly assess population and support needs changes as and when they happen in their area; and
 - ii. co-operate to discharge the duty.
 - c. The Secretary of State may issue Regulations making provision for the resolution of disputes between public authorities relating to the discharge of the duty under this section.

5. In performing the duty under Clause [4], a relevant public authority must secure sufficient specialist services for, in particular:
 - a. Victims of domestic abuse aged over 18.
 - b. Children who experience domestic abuse aged under 18 in their personal relationships.
 - c. Children who experience domestic abuse due to being a close relative of a person as defined in Chapter 1, Clause 1 (2).
 - d. Persons aged over 18 who exhibit abusive behaviours (as defined in Chapter 1, Clause 1 (3)) towards another person that they are personally connected to as defined in Chapter 1, Clause 1 (2).
 - e. Children aged under 18 who exhibit abusive behaviours (as defined in Chapter 1, Clause 1 (3)) towards another person that they are personally connected to as defined in Chapter 1, Clause 1 (2).

6. Every three years from the date on which this section comes into force the Secretary of State must prepare, publish and lay before Parliament a strategic plan setting out their objectives, priorities and the measures they propose to take for the purpose of discharging their duty under section [1]. In preparing and adopting any strategic plan the Secretary of State must take account of any strategy to end violence against women and girls adopted by a Minister or Ministers.

Interpretation

In this Part–

“**domestic abuse**” has the meaning given by Clause 1 of this Act.

“**relevant public authorities**” are public authorities with functions relevant to the provision of specialist services, including but not limited to,

- Ministers of the Crown and Government departments
- Local government in England
- NHS Trusts in England
- Police and Crime Commissioners
- Prison Service
- Prison, police and probation services

“**status**” includes a status for the purpose of Article 4(3) of the Council of Europe Convention on preventing and combating violence against women and domestic abuse and combined forms of such status.

“**specialist services**” include but are not limited to,

- a. protective measures and action taken to protect persons against domestic abuse;
- b. residential accommodation, including refuge services;

- c. counselling and other support;
- d. advocacy services;
- e. access to welfare benefits;
- f. perpetrator programmes;
- g. financial support;
- h. legal services;
- i. helplines;
- j. services designed to meet the particular needs of a group that shares a status to ensure appropriate and effective service provision, including separate or single-sex services within the meaning given in Part 7 of Schedule 3 of the Equality Act and “communal accommodation” within the meaning given in paragraph 3 of Schedule 23 of the Equality Act 2010;
- k. whether provided by a public authority or other person or body.

“**victims of domestic abuse**” include persons who are reasonably believed to be at risk of domestic abuse.

Further information

The Equality and Human Rights Commission is a statutory body established under the Equality Act 2006. Find out more about our work on the [Equality and Human Rights Commission website](#).

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