



**domestic  
abuse  
commissioner**

Domestic Abuse Commissioner for England and Wales  
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Dear Home Secretary,

I strongly welcome the publication of HMICFRS report on the police response to violence against women and girls today, and thank you for your leadership in commissioning this very important piece of work. I believe that the action we take now to implement these recommendations will be vital in holding perpetrators of domestic abuse and sexual violence to account.

There was one particular element of the report that I am very keen to discuss with you as a matter of urgency, not least because I believe the Police, Crime, Sentencing and Courts Bill provides a very timely opportunity to maximise the impact of the recommendations from this report. As you will be aware the report raises concerns that the current drafting of the proposed Serious Violence Prevention Duty “will not go far enough to promote the co-ordinated and bespoke multi-agency response that is needed specifically for VAWG”.

I strongly welcome Baroness Bertin’s amendment to the PCSC Bill to explicitly include domestic homicide, domestic abuse and sexual violence within the definition of serious violence, for the purpose of the proposed Serious Violence Prevention Duty. This amendment is co-sponsored by Lord Polak, Lord Russell and Lord Rosser.

I understand the importance of ensuring that local areas retain the flexibility needed to determine the nature and remit of the local serious violence prevention strategies. Importantly Baroness Bertin’s amendment simply makes clear that these crime types are considered within the definition of serious violence (in the same way that violence against property and threats of violence are included on the face of the legislation), rather than binding all local areas to focus on them. It would still be the case that a strategic needs assessment would need to be carried out and we would anticipate strategies’ specific interventions on domestic abuse and sexual violence might differ from area to area.

I am concerned however, that by not including domestic abuse, domestic homicides and sexual offences on the face of the legislation many local areas will simply not consider them within their strategies. Today’s HMICFRS report demonstrates how these crime types are so often over-looked and side-lined, and not treated with the seriousness they deserve. One third of all violence recorded by the police is domestic abuse-related, and the most common type of violence to be experienced on a

repeated basis is domestic violence. 48% of all female homicides (and 8% of male homicides) are domestic homicides. Despite this, charging, prosecutions and convictions have fallen significantly in recent years for both rape and domestic abuse.

Given that domestic abuse flagged cases make up such a significant proportion of offences against the person and homicides, surely any force that does not consider it within the new duty will be failing to meet their responsibility to protect the public.

By comparison to other crime types there are no significant regional variations per head in rates of domestic abuse and sexual violence. Evidence supplied by Refuge shows that for contacts to the National Domestic Abuse Helpline is roughly equal between all 9 regions in England, when compared with regional populations. Most regions are within 0.01 percentage points of each other when comparing the regional population and contacts proportionally. The exception is London and the North East, which proportionally have the highest and lowest number of callers and chatters supported on the Helpline respectively, but still fall within 0.05 percentage points of each other.

Currently the Serious Violence Strategy, which much of the draft guidance for the new duty points local areas back to, to help them define serious violence, does not recognise domestic abuse as forms of serious violence, and all too often these crime types are side lined. Only 8 out of the current 18 Violence Reduction Units consider domestic abuse in their serious violence strategies. Indeed, on a recent visit to a local Violence Reduction Unit, I was informed that despite interest in including domestic abuse within their framework, they were advised against doing so on the basis of Home Office guidance.

In light of the high and consistent rates per head of domestic abuse and sexual violence across the country, amending the definition of serious violence in this legislation to explicitly include domestic abuse, domestic homicides and sexual violence will not only be important in giving proper recognition to the severity of these crime types, but is also essential in ensuring that local agencies work cooperatively to prevent them from occurring in the first place.

I believe the PCSC Bill provides a perfect opportunity to secure the transformational change, which began under the Domestic Abuse Act, needed to prevent domestic abuse and sexual violence through a preventative, public health-focused, multi-agency response. I would very much welcome the government's support for Baroness Bertin's amendment to the existing clause in the Bill.

As ever, I stand ready to support you to deliver on your commitment to tackle domestic abuse, and would welcome the opportunity to discuss these provisions further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nicole Jacobs', with a long horizontal flourish extending to the right.

Nicole Jacobs  
Domestic Abuse Commissioner for England and Wales