



Domestic Abuse Commissioner for England and Wales
2 Marsham Street, London SW1P 4JA
Commissioner@DomesticAbuseCommissioner.independent.gov.uk

By email to:

Rachel Maclean MP, Minister for Safeguarding, Home Office;

Baroness Deborah Stedman-Scott OBE DL, Parliamentary Under Secretary of State,
Department for Work and Pensions and Minister for Women.

Copy to:

Will Quince MP, Minister for Children and Families, Department for Education;
Kemi Badenoch MP, Minister for Levelling Up Communities and Minister for Equalities,
Department for Levelling Up, Housing and Communities;
Victoria Atkins MP, Minister of State, Ministry of Justice;
Gillian Keegan MP, Minister of State for Care and Mental Health, Department of Health and
Social Care;
Rachel De Souza, the Children's Commissioner.

Keeping children and adult victims safe from domestic abuse and the Reducing Parental Conflict Programme

Dear Rachel Maclean MP and Baroness Deborah Stedman-Scott OBE DL,

As Domestic Abuse Commissioner for England and Wales, I am writing to you to express my sincere concerns about the recent publication of the third evaluation of the Reducing Parental Conflict Programme, published today alongside the announcement of a £33 million package for the Programme.

As you know, the Domestic Abuse Act 2021 introduced important new changes to improve the way that domestic abuse is understood, recognised, and responded to across frontline agencies and government departments. The new statutory definition of domestic abuse introduced through the Act recognises that domestic abuse can take many forms – including emotional abuse, financial abuse, coercive control, as well as physical abuse. Crucially it also acknowledges children as victims of domestic abuse in their own right, recognising the devastating impact on children of experiencing, witnessing or living in a household where one parent is abusing another.

Experts on domestic abuse recognise that it is evidently distinct from parental conflict. One is about two parents feeling able to express their feelings and wishes (albeit not always in a constructive or positive way), but the other is about one partner exerting power and control over another – even where a victim may attempt to resist that control. I would also caution

against an understanding of parental conflict as something that could escalate into domestic abuse. To understand abuse in this context risks victim blaming – that somehow the conflict became ‘too much’ and one parent lashes out at another. We see this argument used in domestic homicide defence cases and it can be hugely damaging. It also limits frontline professionals’ ability to recognise the early signs of coercive control and intervene early to safeguard and support adult and child victims.

Concerningly, I recently received correspondence about a survivor of domestic abuse who had been referred to a parenting programme with her ex-husband, a perpetrator of domestic abuse, by CAFCASS. Based on my engagement with front-line services and specialist third sector organisations, as well as the information in the evaluation today, this is not an isolated case.

I have been working closely with the DWP in recent months and welcome their commitment to ensuring victims and survivors of domestic abuse are not inappropriately involved in parental conflict interventions. However, I was concerned to read in the third evaluation of the Reducing Parental Conflict Programme today that among participants in parental conflict programmes were those who had experienced domestic abuse, mentioning physical assault, coercive control and stalking. Worryingly, the evaluation states that it is difficult to confirm if safeguarding procedures took place in these instances. One participant interviewed stated, “when I was invited to do the course, I wasn’t screened properly... the facilitators couldn’t really cope with some of the comments I was making because the other people hadn’t been through the courses I had, and they hadn’t been through domestic abuse.”

The evaluation also highlighted that one local authority found that there were misunderstandings among professionals around the difference between domestic abuse and parental conflict. The evaluation concluded that experiences of domestic abuse among participants emphasise the importance of ensuring that initial screening for conflict and abuse is robust, and that practitioners continue to remain alert to signs of domestic abuse throughout each parents’ intervention journey.

Despite these concerning findings, there remains a lack of robust research, training and guidance to help professionals understand the difference between parental conflict and domestic abuse. In fact many public materials concerningly imply there is a cross over between domestic abuse and parental conflict – with one tool from CAFCASS citing verbal abuse as a form of parental conflict, and the recent press release and evaluation from the Department of Work and Pensions indicating that parental conflict is a precursor to domestic abuse. Reference within the evaluation to levels of conflict having “passed the domestic abuse threshold” misunderstand that relationships do not ‘escalate’ from conflict to domestic abuse. Professionals should instead be taking steps to recognise the early signs of coercive control and safeguarding and supporting victims to access the support they need to keep themselves and their children safe.

I am concerned that this lack of understanding is engendering confusion among frontline professionals, limiting their ability to spot the signs of coercive control and take action to keep families safe. It also risks strengthening victim-blaming approaches to domestic abuse that we already know are highly prevalent in our society. In my professional experience, victims and perpetrators of domestic abuse will often downplay the signs of coercive control to frontline professionals. It is therefore vital for staff to proactively look for the signs of coercive control and take a safety-first approach, ensuring they safeguard adult and child victims.

It is my strong and urgent recommendation that Departments work together to fund further research, guidance and training to understand the difference between parental conflict and domestic abuse, particularly emotional abuse and coercive control. I would recommend that this work be led jointly by the Home Office and the Department for Work and Pensions. This work should involve the commissioning of specialist domestic abuse expertise to help produce and deliver training, guidance and tools, as well as close consultation with victims and survivors of domestic abuse. Crucially, this must be accompanied by robust data collection and evaluation of the safeguarding procedures in place and the action taken where victims and survivors of domestic abuse are identified.

This work is important not just for the Reducing Parental Conflict programme but for a range of cross-departmental interventions for parents experiencing conflict and difficulty. These include the Supporting Families Programme, funding for the roll out of Family Hubs, the use of out of court arrangements in the Family Court, as well as the Family Court Pathfinder Pilots. Parental Conflict programmes are not alone in struggling to recognise the differences between domestic abuse and parental conflict. As such I have copied Ministers from the Department for Education, the Department for Levelling Up, Housing and Communities, the Ministry of Justice and the Department of Health and Social Care, who should be closely involved in this cross-departmental work. These Departments are also responsible for many agencies including schools, adult and children's social care, health services, CAFCASS, and local authorities which will likely be involved in referring people to Reducing Parental Conflict interventions and have a vital role to play in recognising and responding to domestic abuse.

My office is happy to support this work however we can, and I would welcome the opportunity to meet with you together to discuss these matters further.

Kind regards

A handwritten signature in black ink, appearing to read 'Nicole Jacobs', written in a cursive style.

Nicole Jacobs

Domestic Abuse Commissioner for England and Wales