



**domestic  
abuse  
commissioner**

Domestic Abuse Commissioner for England and Wales

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Rt Hon Sir Keir Starmer MP  
Prime Minister  
10 Downing Street, London SW1A 2AA

Dear Prime Minister,

I would like to warmly welcome you to your new role as Prime Minister of the United Kingdom. Since my appointment as the first Domestic Abuse Commissioner for England and Wales in September 2019, I have had the privilege to act as an independent voice for victims and survivors of domestic abuse, drawing on my 30 years' experience in domestic abuse services, policy and intervention. I have used my statutory powers, as set out in the Domestic Abuse Act 2021, to hold both agencies and government to account in tackling domestic abuse and to raise public awareness. I have had the pleasure of working very closely with the previous Government to help improve the support provided to the 2.1 million victims and survivors of domestic abuse every year and to hold perpetrators to account. I have also welcomed the opportunity to work alongside MPs and Peers from all parties, including Labour, during the passage of important legislation, including the Domestic Abuse Act itself. I look forward to building on these relationships and working with both you and your team in your new capacities in government.

As no doubt you will have seen first-hand as Director of Public Prosecutions, domestic abuse has a devastating impact on victims, their families, and society as a whole. I remember how welcome your dedication to this issue was as I undertook my previous role at Refuge during this period. One in five people will have experienced domestic abuse in their lifetime, and by the Home Office's own assessment costs society approximately £81bn in a single year.<sup>1</sup> Your new Government has a critical opportunity to change this.

I applaud your overarching aim of halving violence against women and girls (VAWG) in ten years, and your personal commitment to this issue. I would like to emphasise to you my sincere offer of assistance to support your Government in achieving the commitment to halve VAWG. My Office works independently of any organisation or political party to amplify the voices of victims and survivors of domestic abuse. My small team of domestic abuse experts develop policy, conduct research, and collect practitioner insight to ensure that we remain at the forefront of understanding of what victims and survivors need, and are well placed to offer solutions. We remain available to the Government to engage and advise on all issues relating to domestic

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<sup>1</sup> Based on 2016 analysis, adjusted to 2023/24 prices.

abuse, as well as to facilitate, wherever needed, invaluable connections to the specialist sector and to victims and survivors themselves.

### ***Prison capacity crisis***

In the immediate term, your Government has inherited a prison estate reaching capacity. As the Domestic Abuse Commissioner, I must take the opportunity to emphasise that the safety of victims must be paramount, and any options to ease the crisis must be considered with great care. Any proposal must give robust consideration to implications for victims and survivors of domestic abuse, and no action should be taken which increases the risk they may face. Any prisoner early release scheme, if progressed, must include an exemption for domestic abuse – this includes those convicted of domestic abuse related offences, as well as those convicted for other offences, but where there is a known history of domestic abuse. HM Inspectorate of Probation found that around one-third of those being managed by probation were known perpetrators of domestic abuse, even when this was not their index offence.

For those perpetrators who have received prison sentences, this provides a period of respite for victims and their children to recover and plan for their safety. Early release undermines this, especially when victims are unable to know the date of their perpetrator's release – without this, safety planning is impossible. Victims must not pay the price of prison overcrowding. Therefore, I call on you to explicitly exclude any offender with a known history of domestic abuse, regardless of whether their conviction is for domestic abuse specifically. Equally, in the longer term, I would repeat my call for domestic abuse to be a statutory mitigating factor for victims who offend as a result of their abuse. The majority of women in prison report experiences of domestic abuse and over half have sentences of less than six months. Victims should not be criminalised due to their experience of abuse, and these prison places should be freed up for more dangerous offenders.

This problem requires long-term solutions. We must acknowledge that this crisis is occurring when just 1 in 5 victims of domestic abuse report to the police, and just 5% of police recorded domestic abuse results in a conviction. As we work to raise awareness of domestic abuse, build faith in the criminal justice system, and improve criminal justice outcomes for victims who do report, convictions will, and should, only increase. Our criminal justice system must be prepared for that.

Analysis done by my office estimates that, if just one-third of victims reported to the police – even if still just 5% of police recorded domestic abuse resulted in a conviction – we could see up to 10,000 additional convictions for domestic abuse every year. If returning to the 2016 high of 18% of police-recorded domestic abuse resulting in a conviction, this would be considerably higher. A lack of prison places must not stop the new Government's ambition to halve violence against women and girls in a decade. We owe it to the 2.1 million victims of domestic abuse every year.

### ***Accountability and governance***

I believe that responding to, and preventing, domestic abuse is everybody's business; every part of the local community and every statutory agency, in partnership with specialist services, has a role to play – not just the police and social services, but housing, education and health services. This is the Coordinated Community Response, of which I am a strong advocate. In the same way, an effective national response to domestic abuse requires a multi-disciplinary approach which

utilises the whole of the government's apparatus, and I welcome your manifesto's commitment to use every lever of government to tackle violence against women and girls.

This will necessarily require robust oversight and accountability on Departments, driven by strong leadership from the very centre of a mission-led Government. The response to domestic abuse and VAWG will benefit greatly from the long-term vision and shared purpose which underpins this approach, as well from as clear outcomes and accountability mechanisms. I am writing to many of your Secretaries of State to highlight the role I believe they have to play in driving this mission, as well as setting out my specific areas of interest, policy concerns and recommendations relevant to their portfolios. This is summarised in my briefing, [A Safer Future Without Domestic Abuse](#), published in May, prior to the General Election.

### ***Specialist services***

The independent specialist domestic abuse sector is the backbone of support for victims and survivors across England and Wales. Its expertise, experience and dedication is unrivalled and has driven forward so much of the life-saving change we have seen over recent decades. Organisations made herculean efforts in the most challenging of circumstances during the pandemic to provide a lifeline for survivors that was more needed than ever. Despite this, to my great disappointment, the sector remains under-funded and undervalued. My [mapping](#) of these services highlighted a sector struggling to meet demand, with a postcode lottery of support provision across England and Wales. This was particularly acute for those services led 'by and for' minoritised communities.

After years of piecemeal funding and the impact of the pandemic, the Local Authorities financial crisis now further threatens the specialist domestic abuse sector. The rise of Section 114 notices, whereupon Local Authorities strip funding of anything without a statutory duty, risks massive cuts to community-based services, which are essential to support victims and survivors and prevent escalation of harm. While provision of safe accommodation is rightly a statutory duty, to solely fund this [represents a false economy](#) and fails to cover the vast majority of victims and survivors who access support in the community. I therefore continue to call for long-term, sustainable funding for these vital services, and urge you to fully consider this at your earliest opportunity – with particular consideration to the invaluable role these services can play in achieving your ambition to halve VAWG in a decade.

### ***Working together***

I have had the opportunity to engage with, challenge and advise Officials and Advisors at Downing Street under the previous Government, and would very much seek to deepen this under your leadership. I would welcome the opportunity to discuss your ambitions and my proposals for working together to drive down domestic abuse and provide support for all victims and survivors.

Yours sincerely,



**Domestic Abuse Commissioner for England and Wales**