

Government consultation on The Child Protection Authority

Role of the Domestic Abuse Commissioner

The Domestic Abuse Commissioner is the independent voice for all victims and survivors of domestic abuse across England and Wales. Engaging at the highest levels of government, the Commissioner presses for survivors to be heard so they get the right help, at the right time.

Through research, campaigning and collaboration, the Commissioner highlights the changes needed to tackle and prevent domestic abuse – so perpetrators are held to account, and survivors get the specialist support to rebuild and thrive.

The Domestic Abuse Commissioner for England and Wales welcomes the opportunity to feedback on the Government consultation on the development of The Child Protection Authority (CPA).

Overarching position

The Commissioner welcomes the proposals set out for the Child Protection Authority, including its functions and the ambition to address system-wide issues. The Commissioner commends the work of the Department for Education and hopes to see further strengthening of the proposals and improvements in practice as a result of the Child Protection Authority's leadership, with the same level of detail and commitment to tackling and effectively responding to domestic abuse.

The proposals reflect some of the key messages set out to Government in the Commissioner's 2025 report, [Victims in their own right?](#) (VITOR) which focused on the experiences of babies, children and young people experiencing domestic abuse and makes a range of recommendations for children's social care and other multi-agency partners in the child protection system. Whilst this is an extremely positive step forward, there are opportunities for the CPA to be further strengthened, which are set out below.

Summary of recommendations

1. The CPA ensures that domestic abuse is named in the governing documents and terms of reference of the Child Protection Authority, that strategic leaders within the CPA are fully trained about domestic abuse, and that the CPA governance and leadership arrangements involve independent domestic abuse specialists.
2. There should be intentional collaboration between the Department for Education and the Home Office in shared accountability for both the implementation of the VAWG strategy and the implementation of the CPA and its role in tackling VAWG.

3. The CPA should include the [Coordinated Community Response \(CCR\) model](#) as a key pillar for whole system alignment. This will ensure that the experiences of adult and child victims of domestic abuse are not overlooked within the broader remit of the child protection system.
4. A shared linguistics framework on domestic abuse should be co-produced with children, complete with definitions and terms related to children's experiences of domestic abuse, to create a more consistent national understanding across the multi-agency response.
5. In addition to the reviews listed on page 28 of the proposals, the Commissioner recommends that Domestic Abuse Related Death Reviews (DARDRs) should be listed to ensure that the learning for the child protection system from domestic homicides and DA-related suicides is not lost or overlooked.
6. In particular, the CPA should consider data and produce thematic reports and recommendations specifically regarding the multi-agency approach for children who are:
 - a. bereaved by domestic abuse related deaths
 - b. experiencing honour-based abuse
 - c. subject to forced marriage
 - d. from particular marginalised groups, such as LGBT+ young people, disabled young people and Deaf young people.
7. The CPA should adopt a comprehensive framework for the infrastructure, governance, behaviours and culture needed both within the CPA and external organisations to collect the information and evidence to drive system improvement for children. This should ensure and inform appropriate use of information, research ethics, GDPR requirements, safeguards in using AI, and inclusion of survivor voice, both adult and child, in influencing data collection and use of information.
8. The CPA takes a cross-government lead role in improving multi-agency practice in relation to children bereaved by domestic homicide and their carers.
9. The CPA should consider their role in the oversight and accountability of the training that all social workers, including LCPPs, receive in relation to domestic abuse, and work towards mandating a consistent curriculum that is delivered in partnership with the independent specialist domestic abuse and VAWG sector.
10. The CPA should use its position and role to influence regulators and professional bodies to inspect the curriculum and quality of training delivered, provide practice directions for practitioners about how to respond to domestic abuse, and advise the government on the need to fund the co-production and delivery of robust training.
11. The learning from domestic abuse related death reviews (DARDRs) should be specifically included in the terms of reference for the CPA to address failings related to children within the child protection system.

Full Response

The overview, scope and design principles of the CPA

Domestic abuse (DA) is the bread-and-butter work of child protection and children's services more broadly. The Commissioner has repeatedly heard from social workers that domestic abuse is a factor in over half of their caseload, and it is well known that domestic abuse is present within 55% of cases subject to a Child Safeguarding Practice Review.¹ It is also the most common family-level risk factor featuring in Serious Incident Notifications relating to a child death.

The Commissioner welcomes the ambition to join up the multi-agency child protection system across three of the government's missions, including opportunity, health and safer streets, and that halving VAWG as well as knife crime is named in the role that the CPA will play. The Commissioner welcomes the scope of the three core functions of the CPA to provide system leadership and national oversight, promote and embed good practice and drive improvement and accountability in multi-agency child protection as well as the role of horizon scanning.

The Commissioner's 2025 VITOR report set out 66 recommendations to public bodies across seven key themes, including centring children's voices, stronger cross-departmental working and strategic leadership, holistic funding, data and evidence, specialist training for every frontline professional who may work with babies, children and young people, safeguarding, and ensuring practice is informed by specialists. Many of these recommendations and the content of the report are relevant to this consultation.

Throughout the development of this report, the Commissioner's team consulted with children and young people and produced an accompanying report that conveyed their views, called [Tell Nicole](#). Children told the Commissioner about the importance of listening to children and young people, and what they want from professionals who want to help them in terms of qualities, skills and ways of working together. The CPA should consider these views of children in the development of the CPA as it considers how it provides learning and support for practitioners and drives system improvements.

The Commissioner welcomes the CPA viewing all of its aims and delivery through the lens of racial and socio-economic disparities, and that the leadership will reflect the diversity of the communities that it serves so that at the very top of the CPA, the systemic barriers that various marginalised groups face in getting the support and access to services that they may require are understood.

¹ Dickens, J. et al. (2022). Learning for the future: final analysis of serious case reviews. Available at: https://assets.publishing.service.gov.uk/media/6396fdf8e90e077c33497013/Learning_for_the_future_-_final_analysis_of_serious_case_reviews__2017_to_2019.pdf. (Accessed 17 February 2025).

The Commissioner agrees with the recognition that positive change is hindered due to single-issue initiatives and insufficient funding, resulting in inconsistency across the country. The National Review into the tragic deaths of Star Hobson and Arthur Labinjo-Hughes highlighted that the practitioners in the specialist domestic abuse service showed a good understanding of the impact of domestic abuse and the potential risks to children. These cases demonstrate the importance of involving specialist practitioners to improve other agencies' practice and to ensure specialist expertise is valued and contributing to decision making, including when there are concerns about children.

Therefore, **the Commissioner recommends that the CPA ensures that domestic abuse is named in the governing documents and terms of reference of the Child Protection Authority, that strategic leaders within the CPA are fully trained about domestic abuse, and that the CPA governance and leadership arrangements involve independent domestic abuse specialists.**

CPA contributions to the work to tackle violence against women and girls (VAWG)

Accountability and independence

Whilst it is important that there is accountability through the Opportunity Mission Keeping Children Safe ministerial board, the Commissioner is concerned that there will be an oversight and siloed approach as the accountability of the VAWG strategy sits under the Safer Streets mission in the Home Office, which also has its own governance structures.

Therefore, **the Commissioner recommends that there should be intentional collaboration between the Department for Education and the Home Office in shared accountability for both the implementation of the VAWG strategy and the implementation of the CPA and its role in tackling VAWG.** This needs to go beyond top-level update meetings and move into a shared ownership for accountability and action planning for the integration of a robust response to tackle DA and VAWG within the child protection system. The Commissioner would also like to see that the Opportunity Mission Keeping Children Safe ministerial board includes a VAWG-specific sub-group of this board.

The independent nature of the CPA is essential for it to earn the credibility and trust required for it to carry out accountability with authority.

Multi-agency working

The cross-government VAWG strategy set out its commitments and action plan to halve VAWG in a decade. Whilst the Commissioner welcomes the ambition and some of the

measures announced, especially relating to preventing domestic abuse, there is still no long-term sustainable funding for independent specialist services to ensure victims can access support in their area, despite the fact that many of these measures will likely drive up both safeguarding and domestic abuse support referrals.

As set out in the CPA proposals, the vision of a successful multi-agency child protection system will only be achieved if the CPA collaborates with, and meaningfully involves, VAWG and DA experts, as well as the voices of survivors (adults and children) of domestic abuse and VAWG, at the earliest opportunity in the developments of the CPA as the functions are being explored.

The proposals describe the pressure that the system is under from rising demand and costs with inconsistent experiences that require investment and reform, with relevant lessons from previous reforms about the importance of being whole system focussed and backing with significant investment particularly in family help.

The pillars set out on page 16 of the proposals should incorporate the multi-agency [Coordinated Community Response \(CCR\)](#)² model of practice, which shifts responsibility for safety away from individual victims and survivors towards the community and services existing to support them. **The Commissioner recommends that the CPA should include the CCR model as a key pillar for whole system alignment will ensure that the experiences of adult and child victims of domestic abuse are not overlooked within the broader remit of the child protection system, as well as children and young people who are using harmful behaviours.** This is not instead of other pillars, but in addition to them.

This means joining the dots across all government departments, given that safeguarding is everybody's business. Referring to the Working Together to Safeguard Children pillar in the 'Whole system alignment' section of the proposals, this means that the CPA should ensure that they are feeding into other work that XGOV depts are doing, e.g. development of the Victims Code (MoJ), implementation of the national youth strategy (DCMS), implementation of the 10 year health plan (DHSC), commissioning of victims services work (HO and MoJ), reforms to policing (HO), oversight of support in safe accommodation (MHSLG), and online harms (DSIT).

There is a role for everyone and there needs to be a centralised cross-governmental working group to consider the multi-agency response to children experiencing domestic abuse.

² Standing Together Against Domestic Abuse (STADA)

Specialist services ease pressure on statutory services

Community-based domestic abuse services are not statutory, yet they are found in almost every corner of the country. The role that these services play in supporting the child protection system, as well as other statutory agencies, is hugely underestimated. Independent advocates and support workers offer trauma-informed risk assessment and safety planning for victims of domestic abuse, advice about housing and safe accommodation options, access and referrals to a variety of services, as well as advocacy in child protection proceedings, family court and criminal justice processes. Without these vital roles and organisations, victims and survivors would rely solely on statutory agencies within the child protection systems.

In 2022, the Commissioner surveyed over 4,000 survivors of domestic abuse, as well as commissioners and providers of services, and published a mapping report, [A Patchwork of Provision](#). This report found that only 29% of victims and survivors of DA who wanted support for their children were able to access it and that only 7% of victims and survivors who wanted their perpetrator to receive support to change their behaviour were able to get it. Survivors said that the confidentiality and independence of a service was of critical importance to them. There were particular concerns about the sharing of information with social services and the Family Court, with victims and survivors fearing that their children would be removed if they sought help for domestic abuse.

Equally, independent voluntary and community sector organisations bring in a considerable amount of funding from other sources. This demonstrates the ability of voluntary and community sector organisations to attract investment into a local area through applications to charitable trusts and other grant funders, and the added value they are able to bring. They can also innovate through funding acquired elsewhere and make use of this learning in the delivery of their commissioned services.

It is imperative that domestic abuse services maintain their independence while co-locating and engaging in a multi-agency response with statutory partners, including children's social care. The independence of a support service is of critical importance and is particularly acute for those from minoritised communities subject to structural inequality.

Families First Programme (FFP)

The Commissioner welcomes the DfE's investment of £2.4bn into the FFP for children's social care prevention reform, including Family Help embedding multi-disciplinary teams in communities, with £547m of this ringfenced for spend on prevention and de-escalation. However, it is unclear to the Commissioner, and there appears to be a lack of publicly available information, about how this money is spent, and how much of this is allocated to DA and VAWG specialist services locally, or any other type of support for

children beyond the statutory response. The spend on support for victims of DA, including children, from this huge investment must be relative to the scale of DA that the CP system is dealing with.

The [Families First Partnership \(FFP\) Programme Guide](#) is woefully inadequate in relation to DA, which is only mentioned 11 times and does not give enough credence to the work of independent specialist advocates, how to partner with them, and the role they play in unlocking so many other types of support for victims beyond the social work response. It also does not describe the expertise required for any in-house DA specialists within the CSC workforce, despite it being the overarching umbrella or the core reforms.

It is vital that the CPA are able to make recommendations about the use of the FFP funding to ensure that there is a fair and reasonable proportion spent consistently on embedding independent specialist services within multi-agency protection teams, as well as full cost recovery funding for these services to be able to fully participate in multi-agency fora locally, such as the LSCP, and deliver training to professionals.

Family Group Decision Making (FGDM)

The Commissioner [responded](#) to the government consultation on ‘Children’s social care: stable homes, built on love’ in 2023 and set out a series of recommendations about how the children’s social care system and provision of specialist services needed to be far stronger in the proposals. As the reforms to children’s social care have developed, and with the amendments to the Child Wellbeing and Schools bill, the Commissioner has continued to raise her concerns with various stakeholders, including DfE officials, about the guidance surrounding FGDM, specifically where domestic abuse is a factor in cases.

It is imperative that there is a consistent approach from end to end of the child protection system about how domestic abuse is explored and understood much earlier than, and prior to the FGDM process, as well as the importance of a firm offer of support from an independent DA service.

Shared linguistic framework

A key recommendation within the VITOR report, and that **the Commissioner recommends again here is a shared linguistics framework on domestic abuse, which should be co-produced with children, complete with definitions and terms related to children’s experiences of domestic abuse, to create a more consistent national understanding across the multi-agency response.** The result will enable strong communication, clear guidance and policy making, effective frontline practice, and ultimately lead to the most helpful support for victims and survivors of domestic abuse. This should include language that describes children’s experiences of domestic

abuse and its impact, teenage relationship abuse and child and adolescent to parent violence and abuse (CAPVA), as well as other terms relating to children’s intersecting experiences.

System leadership and oversight of the child protection system

Learning from Domestic Abuse Related Death Reviews (DARDRs)

The Commissioner agrees with the proposals for how the CPA will have national oversight of the child protection system, particularly with regards to the monitoring of the implementation of recommendations from different types of reviews. In addition to the reviews listed on page 28 of the proposals, **the Commissioner recommends that Domestic Abuse Related Death Reviews (DARDRs), currently known as Domestic Homicide Reviews (DHRs³) should be listed to ensure that the learning for the child protection system from domestic homicides and domestic abuse related deaths including suicides is not lost or overlooked.**

In Autumn 2022, in preparation for the development of a domestic homicide oversight mechanism, the Commissioner commissioned Manchester Metropolitan University ‘Homicide Abuse Learning Together’ (HALT) Project, to carry out four thematic reports related to DHRs. This was to help better understand the types of recommendations made in DHRs across a range of practice areas, such as adult social care, health, criminal justice and children’s services. This work was intended to provide a better understanding of what an oversight mechanism could achieve with regards to thematic analysis. The [briefing paper for children’s services](#) identified a multitude of learning relevant to the work of the CPA, including key messages about training for social workers, carrying out risk assessments, the culture within children’s social care, and the importance of specialist services. It also identified good practice, for example in relation to victim-centred practice and multi-agency collaboration.

In the Commissioner’s oversight mechanism pilot findings, which are summarised in the recently published [Learning from Loss report](#), children’s social care were one of four agencies with more than 10 incomplete actions across the DHRs in the pilot. There were 51 recommendations from 74 DHRs which were for children’s services, 22 of which were for children’s social care. This highlights the need for more accountability within the system for actions from DHRs.

³ Domestic Homicide Reviews (DHRs) will soon become known as Domestic Abuse Related Death Reviews (DARDRs) when revised statutory guidance, due imminently, is published. The new term is intended to include all types of deaths related to domestic abuse, including homicide, suicide and unexplained deaths.

Horizon scanning

It is vital that the CPA are proactive in joining the dots between the various major reform programmes relating to the Devolution Priority Programme in England (MHCLG), the policing reforms (Home Office), the health reforms to Integrated Care Boards (ICBs) and the transition of the functions of Police and Crime Commissioners (PCCs) to local Mayors or elected officials.

Whilst this may appear to be a wide remit for the CPA on paper, the impact of these reforms in practice will have a direct and significant impact on the commissioning landscape over the coming years, making the provision of services, including domestic abuse crisis and recovery services, very vulnerable. The CPA has a role in setting the mandate for the provision of referral pathways for children and young people and their non-abusive parents, which will likely be at risk, and this will be an emerging theme for the CPA to monitor and raise to government through horizon scanning activity.

The VAWG strategy commits to a radical overhaul of the commissioning landscape, but this cannot be done without understanding commissioning in the context of these wider reforms.

Data and evidence gathering

The Commissioner welcomes the proposals for the CPA to identify patterns and gaps using data to improve practice and provision for children. As well as the data sources listed, and to ensure that children who are victims of domestic abuse are truly represented and their experiences understood, it will be important to collate data about other specific groups which are often overlooked.

Therefore, **the Commissioner recommends that the CPA also considers data and produces thematic report and recommendations regarding children who are:**

- **bereaved by domestic abuse related deaths**
- **experiencing honour-based abuse**
- **subject to forced marriage**
- **from particular marginalised groups, such as LGBT+ young people, disabled young people and Deaf young people.**

More broadly in terms of best practice for data gathering, evaluation and evidence-based decision making, **the Commissioner recommends the CPA adopt a comprehensive framework for the infrastructure, governance, behaviours and culture needed both within the CPA and external organisations to collect the information and evidence to drive system improvement for children.** This should ensure and inform appropriate use of information, research ethics, GDPR requirements, safeguards in using AI, and inclusion of survivor voice, both adult and child, in

influencing data collection and use of information. The [Children's Information ethical and effective use of information framework](#) sets out clear, rigorously tested, principles for data and evidence gathering to which the CPA should consider.

The Commissioner recognises that child protection responses, both nationally and locally, are affected by changing trends, focus, funding and prioritisation. These issues are interdependent and therefore must be considered in the round. In her VITOR report, 2025, the Commissioner highlighted the true scale and prevalence of child victims of domestic abuse is not known. This must change. Therefore, the CPA should continue to work closely with the Office for National Statistics, supporting their work in developing the [Safety in Childhood prevalence study](#). Similarly, the CPA should work closely with the Department for Education as they consider development work to the [Children in Need statistics](#) to ensure this national (and accredited) data set continues to provide as accurate a reflection as possible on the experiences of children and young people across England.

The Commissioner anticipates the CPA will likely need to maintain and integrate existing data collection systems with newly generated data sets and eventually design and build new data solutions. The additional organisational burden and technological expertise needed to achieve these improvements should be considered from the outset.

The integrity, quality and validity of data collections will also be an important consideration for the CPA when drawing on evidence for decision and recommendation making purposes. Currently there are several examples within the government's tackling VAWG initiative where incomplete or missing data is hampering policy and practice development, e.g. the stark differences in reported safe accommodation provision that either indicates great discrepancies and/or unreliable recording. There has also historically been poor recording of ethnicity data within child protection records.

A key part of generating high quality, robust data and evidence are evaluation processes. Whilst it has been well documented the methodology underpinning evaluation approaches are fundamental, operational readiness and the practicalities of implementation are equally important. The CPA should therefore consider, pragmatically, evaluation design requirements whilst ensuring services with smaller or more precarious funding provision are not excluded. The Commissioner welcomes the ambition to embed lived experience in shaping research questions, particularly in culturally specific contexts. Ensuring that research reflects the needs and priorities of children and their non-abusive parents and carers; and that research tools are proportionate, acceptable, and focused on what genuinely keeps children safe; is not only best practice and ethically sound, but also more likely to generate the engagement needed for meaningful evidence.

To address evidence gaps at a national level, the CPA will need to develop strong working relationships with relevant academics, What Works Centres, specialist

libraries, charities, research funders, the ONS, and government departments that generate key data. These partnerships are essential for understanding the scale of the issues and identifying effective interventions and best practice in protecting children.

Progress in developing evidence-based interventions at the intersection of child abuse and domestic abuse has been hampered by several factors. These include limited understanding of the complexity and hidden nature of domestic abuse and coercive control, insufficient recognition of perpetrator behaviours, and a lack of attention to wider system conditions (such as criminal and family justice processes, immigration policy, poverty, and economic abuse) that shape victims' experiences. The specialist domestic abuse sector, which holds much of the expertise needed to inform this understanding, often lacks the capacity to contribute fully. Chronic underfunding, both in value and contract length, undermines staff retention, organisational learning, and the ability to undertake evaluation activity alongside supporting survivors in crisis.

Evaluation planning and design must therefore be realistic about these pressures and create space for survivors and frontline staff to contribute meaningfully. Evaluations must fit alongside the overriding priorities of safety, stabilisation, and recovery. It is essential that the factors underpinning excellent practice and expertise are understood, replicable, and transferable, rather than reliant on exceptional individuals or unique circumstances. Dedicated funding should be allocated for a Technical Assistance Fund to support evaluation activity within child protection and domestic abuse services, enabling the sector to build the much-needed evidence base.

Duty to Collaborate, Victims and Prisoners Act (VPA) 2024

The Duty to Collaborate was introduced through the VPA and is a mechanism to bring together the three statutory safeguarding partners to share data about DA and sexual violence (SV) service provision, albeit it will likely be other people like commissioners and VAWG leads who carry out the related activity. The output of the duty is to jointly produce a joint strategic needs assessment (JSNA) to develop a shared understanding across these agencies of the local need, provision for DA and SV victims and survivors, and identify gaps in support for them. However, the duty is yet to be implemented and the guidance development is on pause at the MoJ, as major reforms are underway across health (ICBs), policing, local authority devolution and the abolishment of PCCs.

The Commissioner would like to stress the importance of the CPA development team working closely with the MoJ Duty to Collaborate team as their guidance is developed to ensure that data on DA and CSA is collected consistently to evidence the need for specific specialist support for children who may experience the intersections of both types of harm, as per the report above, and to avoid duplication and confusion, which will be inevitable with the reforms mentioned above in the 'Horizon Scanning' section of this response.

Proposals for how the CPA will provide system learning and support.

Good practice

The Commissioner welcomes the proposals set out in relation to the centralisation of resources, the sharing and embedding of good practice, and the application of learning. Within the Commissioner's office, the Practice and Partnerships team engage regularly with partners at the local level who are involved in the multi-agency response to domestic abuse. In 2023, in the early stages of the VITOR report, the Commissioner held 11 practitioner roundtables to hear about good practice locally and to understand the challenges, and produced a [document with the findings from this engagement work](#).

The Commissioner agrees that the CPA should commission research and collaborate with expert bodies as listed. However, this list should not be exhaustive, and it is imperative that the CPA collaborates closely with the independent specialist domestic abuse and VAWG sector, and not just national public bodies which are not frontline. It is also vital that the CPA includes collaboration with people with lived experience of domestic abuse to fully understand good practice responses.

The Commissioner's team are already aware of several promising interventions that could be shared with the CPA for further exploration and dissemination, such as co-located specialist services in children's social care, a pilot that saw excellent outcomes in relation to [intractable cases at Marac](#), and the [Safe and Together model](#) embedded in children's social care.

Children bereaved by domestic homicide and their carers

Children bereaved by domestic homicide face profound and long-lasting impacts, including stigma and a lack of clear information about what happened. Many experience a "silencing effect" where adults avoid talking about the death, leaving children to piece together confusing or inaccurate accounts.

Support for these children is inconsistent. Schools and frontline services often lack the knowledge or experience to respond effectively. In the immediate aftermath, multi-agency decisions can prioritise short-term safety over thoughtful long-term planning, including who children are placed with and how their views are considered in decisions about contact with the perpetrator or accused.

Emotional and psychological support varies widely. While some children receive appropriate trauma-informed care, others find that services do not match the complexity of their loss. Children need support that is child-centred, accessible, tailored to trauma and bereavement, and flexible across different stages of their lives.

Kinship carers also carry significant emotional and practical responsibilities and require comprehensive support to ensure stability and positive outcomes for the children in their care.

The Commissioner recommends that the CPA takes a cross-government lead role in improving multi-agency practice in relation to children bereaved by domestic homicide and their carers.

Specialist domestic abuse sector

In the VITOR report, the Commissioner recommended that the government fund co-located independent specialist domestic abuse services in the new Family Help and Multiagency Child Protection Teams. The Families First guidance currently makes DA specialism within these teams optional, yet well over 50% of casework across the country relates to domestic abuse. The Commissioner is of the firm view that DA specialism through the specialist sector should be mandated, funded and embedded within and throughout children's social care.

To truly understand what works as part of a wider multi-agency child protection system, holistic packages of support need to be evaluated. This needs to go beyond one-off interventions or siloed approaches. The role of independent advocacy for non-abusive parents and for children experiencing domestic abuse cannot be underestimated in terms of the value that victims place on this, but also the pressure that is eased in the system by providing this. Ethical evaluation of this, as well as other provisions that don't neatly fit into the category of 'intervention' should be a priority, such as drop-in centres for victims, safe spaces for young people and peer support groups to name a few.

Children's views about what professionals should know

Through Tell Nicole 2025, children said that the government could help by educating adults about the impact of domestic abuse upon children. To help them recover from domestic abuse, children need professionals to recognise that children's accounts of what was happening may differ from those of their parents and carers. They wanted workers to recognise that they as adults have more power, which can be unfair to children. Schools needed to take a much greater role in supporting children affected by domestic abuse. This could be done through training teachers to update their knowledge on trauma and the impact of domestic abuse on children, and signs of abuse, including within young people's relationships. They want workers who understand domestic abuse and who are good at working with children and young people.

Workforce training and development

The Commissioner agrees that the CPA needs to work with regulators and professional bodies, and national government, to promote consistent training standards across

safeguarding partners. However, the proposals do not go far enough. Collaboration is mentioned with regulators, professional bodies and safeguarding partners, but it doesn't acknowledge the role of the independent specialist sector in sharing their expertise and the vital role they play in so many areas where they are commissioned to support the training of staff through local learning and development (L&D) offers. The CPA must engage with this sector to inform their work on workforce development.

The CPA must also recognise the breadth of the types of practitioners working with babies, children and young people, such as health visitors, volunteer and paid youth workers, and counsellors just to name a few, and each of whom require an understanding of how to identify and respond to domestic abuse. The Commissioner's VITOR report (pg. 127-129) set out a comprehensive training recommendation for a tiered, building block approach and which the Commissioner continues to advocate for across the multi-agency response to domestic abuse.

The Commissioner continues to advocate for this recommendation that the government should fund the development and delivery of specialist training for every frontline professional working with babies, children and young people who might be at risk of domestic abuse, and **recommends that the CPA uses its position and role to influence regulators and professional bodies to inspect the curriculum and quality of training delivered, provide practice directions for practitioners about how to respond to domestic abuse, and advise the government on the need to fund the co-production and delivery of robust training**, based on the learning identified in the Commissioner's HALT research findings and the learning from multiple serious children's case reviews and the recent JTAI inspection into domestic abuse.

In March 2025, the Commissioner responded to the DfE consultation on the post-qualifying standards (PQS) for social workers. Based on the lack of domestic abuse content within the social work curriculum and what practitioners said in roundtables about little to no training about coercive and controlling behaviour (CCB), the Commissioner made the following recommendations within that response:

- The DfE mandates specific curriculum and assessment criteria about domestic abuse, including coercive and controlling behaviour, through the 2025 Early Careers Framework and develop practice directions to accompany this.
- Social Work England commits to a rigorous inspection of Social Work degrees and the domestic abuse content in degree programmes and ensures that those delivering this curriculum are themselves trained in domestic abuse. The inspection criteria should be developed in close collaboration with the specialist domestic abuse sector and the Domestic Abuse Commissioner.

- Social Work England reviews the Knowledge, Skills and Behaviours standards through a domestic abuse-informed lens to ensure that course providers understand what must be done to achieve the standards.

The Commissioner also outlined a long list of specific competencies (see Annex A below) that she believes all social workers should have. The Commissioner would like to see the CPA influencing the curriculum content, as well as the quality of its delivery, for all social workers, whether they are early in their career training, or have experience of many years of practice.

Lead Child Protection Practitioner role (LCPP)

The CPA must take oversight of the scope and implementation of the LCPP role, set out within the FFP guidance, aimed at strengthening frontline CP practice. The LCPP appointed persons must have an adequate level of DA and VAWG training and the CPA should set out local accountability mechanisms to ensure this is up to date and of the highest quality and consistency no matter where they are in the country.

The proposals refer to specialist CSAE training for social workers and the wider CSC workforce but currently it does not include VAWG, including DA and coercive control, specifically, which is a huge oversight. Therefore, **the Commissioner recommends that the CPA should consider their role in the oversight and accountability of the training that all social workers, including LCPPs, receive in relation to domestic abuse, and work towards mandating a consistent curriculum that is delivered in partnership with the independent specialist domestic abuse and VAWG sector.**

The Commissioner's office has recently supported the DfE to convene a roundtable of DA training experts to inform the development of the training programme for the LCPP role.

How the CPA will drive system improvement in the child protection system

Learning from reviews

The Commissioner welcomes the proposals set out for the CPA to support multi-agency learning and improvements. In addition to the reviews listed in the proposals, **the Commissioner recommends that the learning from DHRs and DARDs should be specifically included in the terms of reference for the CPA to address failings related to children within the child protection system.**

As set out in the 'System leadership and oversight of the child protection system' section above, the research with HALT into the [thematic findings](#) in DARDs about children's services and the 'Learning from Loss' report gave plenty of detail about the

volume of recommendations and actions for children’s services and systems that failed children and/or their non-abusive parent.

The Child Safeguarding Practice Review Panel’s [Annual Report 2023 to 2024](#) found that in 47% of cases where a child died or was seriously harmed, rapid reviews identified domestic abuse within the household – particularly affecting babies under 12 months. The Panel’s [report](#) about protecting and responding to CSA within the family environment found that there was a lack of understanding of parents’ and carers’ contexts, especially the impact of DA and CCB in the lives of mothers and the way this could result in CSA not being considered by practitioners.

The recently published [national review](#) into the broader safeguarding issues raised by the death of baby Victoria Marten and explores complex issues for practitioners engaging with victims of domestic abuse, including the need for professional curiosity where there is a persistent lack of engagement with services, as well as recognising the dynamics and impact of coercive control.

There are plenty of reports and recommendations in the public domain about the learning from serious and fatal cases, including the Commissioner’s own research and reports. The Commissioner strongly urges the CPA to consider how they go beyond releasing further reports and consider what needs to change in policy and practice so that they can influence the actual implementation of recommendations at both a national and a local level.

Learning from JTAI inspection

The recent [JTAI report into the multi-agency response to children who are victims of domestic abuse](#) offers many relevant findings and lessons that the CPA should consider in relation to driving system improvement in the child protection system. Pertinent to this consultation, findings include:

- Failing to fully understand the risk of domestic abuse to children can result in delayed referrals and delays in child protection strategy meetings, when children may be at risk of significant harm.
- There is not always a comprehensive understanding of children’s lived experiences of domestic abuse, which results in limited recognition of both the impact on the child and their current level of risk.
- The impact of a lack of effective risk assessment, insufficient challenge by professionals and agencies, and overoptimism that change had already been achieved has led to poor decision-making in some cases, including inappropriately ending a child protection plan. This can have the unintended consequence of increasing risk.

- Under the national approach to managing probation workloads, which was in place at the time of the inspection, probation contact with the perpetrator and involvement in multi-agency working for the child may end in some cases once a child protection plan is no longer in place. This potentially leaves gaps in oversight of perpetrators and safeguarding of children.

Multi-Agency Arrangements (MAPPA) and Risk Assessment Conference (Marac)

The MAPPA and the Marac are key parts of the multi-agency response in cases of domestic abuse. Of the 107,674 cases discussed at a Marac in England and Wales in year ending March 2024, 134,222 children and young people were living in those households, subject to high-risk domestic abuse. All statutory services and any professionals working with children have a duty to safeguard children and report any risks of harm to Marac, as well as Multi-Agency Safeguarding Hubs.

Referral data shows that the police, by far, refer the most victims and survivors and their children to Marac (63.8%). Despite the high prevalence of domestic abuse within social work caseloads, just 2.9% of referrals came from children's social care, 0.6% from the Multi-Agency Safeguarding Hub and just 0.2% from education settings.

The Child Safeguarding Practice Review Panel found that there are challenges with information sharing in Marac regarding children and not connecting the risk to the child with the risk to adult victims.

There are particular gaps in Marac and the management of high-risk cases for those children and young people with intersecting needs. For example, in the Black and minoritised led 'by and for' services roundtables, practitioners noted a lack of awareness and understanding of harmful practices, such as FGM and Forced Marriage, and so-called 'Honour'-Based Abuse. Practitioners recommended that specialist 'by and for' organisations are represented at multi-agency forums and included in decision making to ensure full understanding of the risk and hidden harms are addressed. An example of best practice is the work of the Co-Action Hub, which published a [report](#) about Marac effectiveness for cases of harmful practices. In the Royal Borough of Kingston, this led to a standalone Harmful Practice Marac, leading to better outcomes for survivors and their children and, in the long run, enhancing the competence of the full forum to reconverge the cases in the local Marac.

There is currently no national oversight of Marac as a whole system as it is not a statutory process, yet most local areas operate some model of a Marac. Marac falls within the policy remit of the Home Office, but predominantly with a view to the adult victim. The CPA should consider its role and interface with the Home Office and advise the DfE about how it can drive improvements to strengthen Marac to ensure that

children are considered as victims in their own right, through a whole family lens, within the Marac.

Barriers to implementing recommendations

Over the last 13 years since the introduction of Domestic Homicide Reviews (DHRs), there has been a significant repetition in the nature and themes of recommendations. Chapter 2.1 of the Learning from Loss report outlines some of the issues and challenges highlighted by Community Safety Partnerships (CSPs), Police and Crime Commissioners (PCCs), statutory and voluntary agencies involved in DHRs. This includes issues observed in scoping the need for an oversight mechanism and issues raised by families bereaved by domestic abuse-related deaths. The report also outlines a proposal for the national rollout of the oversight pilot to support the implementation of recommendations from DHRs. At the time of writing this response, the Commissioner is still awaiting the government response to this report, which is overdue. The CPA are welcome to review this report and use any learning we have already found to inform plans for oversight of similar reviews relating to children.

As part of the pilot, the Commissioner's office convened and co-ran a DARDR Forum, in partnership with the Local Government Association (LGA) and the Association of Police and Crime Commissioners (APCC). This was a collaborative approach bringing together those leading on DHRs in local authorities, CSPs, PCCs offices and health bodies. The purpose of the DARDR Forum was to support those responsible for managing the domestic abuse-related death review process at an operational and strategic level. The forum provides a space to share learning and practice, raise issues and concerns, receive updates and keep up to date with, and informed of, work related to domestic homicides and other domestic abuse-related deaths, including suicides.

Serious and consistent failings

When things continuously go wrong, the most important ingredient of accountability is the 'so what?' question if action isn't sufficient to address the failings. The CPA must have the authority to compel information, direct actions and advise inspectorates.

However, this is all dependent on the CPA having domestic abuse expertise baked into their structures, governance arrangements and workforce to ensure that these functions work for the safety and freedom of all victims of domestic abuse, including children.

Commissioning

Whilst the CPA should be able to influence or advise on this in areas where there is systemic failure, it is important that commissioned services are not scapegoated for failings elsewhere. It would be easy for statutory agencies to place blame on failures of commissioned support services which are so over-stretched. However, the CPA should be influencing commissioning and procurement from the outset to ensure that specialist services are fully compensated for both their delivery of case work or support services, but also for the institutional capacity that they often share and absorb the costs of for the greater good. These organisations are necessary at so many multi-agency meetings, strategic boards, and engagement events, and yet they are not routinely remunerated appropriately for this work. The CPA can support the setting of commissioning standards to ensure that this is done well and ethically, and that specifications are fair and accessible to providers, especially smaller 'By and For' led organisations.

Proposals for how the CPA will be structured and engage with other organisations

Engagement with children, young people, victims and survivors

The Commissioner welcomes the commitment to ensure that the lived experiences of victims and survivors, including children, are central to the development of the CPA. It is important to be cognisant that many practitioners and partners, including CPA staff, will likely have lived experience, and so the embedding of a trauma-informed approach across the whole piece will be essential.

The Commissioner's office employs a Lived Experience Engagement Lead who has been responsible for engagement with children and young people through the Tell Nicole 'SAaFERr' framework (see [chapter 1 of the Tell Nicole report](#)), and engagement with adult survivors through our survivor hub. The Commissioner's office regularly advises government departments on good practice engagement activities with survivors and would be happy to share the learning with the CPA as they develop this work.

As the CPA develops their portfolio of work it is imperative they ensure survivor voice mechanisms are designed to reach and include the most excluded and vulnerable minoritised populations, as these are the same populations at greater risk from perpetrators of domestic abuse.

Meaningful engagement with survivors including children and young people requires investment in time, capacity and relationships. Organisations and survivors themselves should be remunerated for the time and expertise that they share with the CPA.

Engagement with the independent specialist VAWG/DA sector

This sector should form part of the core expertise of the CPA. Any sector engagement should be appropriately remunerated at full cost recovery. The CPA need to set the standard for how this is done so that it is reflected in local arrangements to ensure that an already over-stretched sector is not squeezed even further. It cannot be expected that this sector will perform an institutional advocacy and capacity building role without the relevant resources.

The expertise of this sector is invaluable, and this should be reflected in governance arrangements, offering an equal seat at the table to expert sectors in other types of harm, and other statutory agencies. They should be involved at all stages of development of the CPA and in the delivery of the CPA's work. If the CPA can take a leadership role in doing this by example, others will follow.

Annex A

The Domestic Abuse Commissioner's response to the Department for Education's consultation on the post qualifying standards for social workers.

The Commissioner would expect that every social worker can demonstrate competence in the below areas, and strongly recommends that the following is reflected in the PQS standards:

- Competence in assessing risk and need and tailoring support for children experiencing domestic abuse.
- Competence in planning focused support sessions with children that are appropriate for children's age and development and align with their individual and intersecting needs.
- Understand how to tailor support for children bereaved by domestic abuse-related deaths.
- Understand how to engage with perpetrators, supporting them to engage in behavioural change programmes while holding them to account.
- Understand how to advocate for children, both on an individual and institutional level.
- Understand children and young people's experiences of domestic abuse as complex trauma, including the challenges faced by children and families.
- Understand the impact of domestic abuse for children, young people, their families, and wider relationships and the coping mechanisms they may use in the context of intersectionality, recognising the diverse nature of identities and need.
- Understand the importance of information sharing and multi-agency working when working with children and young people with lived experience of domestic abuse.
- Understand the link between domestic abuse and other forms of risk and harm, including serious violence.
- Understand the dynamics of domestic abuse, including recognising 'victim blaming' and placing responsibility on perpetrators using harmful behaviours.
- Competence in documenting interactions with children, being mindful of appropriate terminology.
- Recognising the protective role and strengths of the non-abusive parent and the importance of protective relationships.
- Understand typologies of perpetrators (including various forms of presentation).
- Understand effective strategies for prevention, identification and intervention that ensure children and their non-abusive parent/guardian receive appropriate and timely support.



- Exercise professional curiosity and confidently spot the signs of all forms of domestic abuse (including coercive and controlling behaviour, technology-facilitated abuse, so-called ‘honour-based’ abuse and harmful practices) for all children.
- Respond appropriately to children who are experiencing domestic abuse. This includes demonstrating trauma-informed practice, age-appropriate communication methods, understanding barriers to engagement, and best responses for children with diverse identities and needs, and protected characteristics, recognising the importance of intersectionality.
- Refer children (and associated adults) to relevant services. This includes knowledge of local specialist services and understanding both organisational and statutory safeguarding systems and local protocols for all levels of need, including early help. Professionals should be confident navigating local and interagency referral pathways.