



A consultation on the CPS Violence against Women Strategy and Action Plans

Response to Consultation

This information is also available on the CPS website at: www.cps.gov.uk.

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Introduction

This is a summary of the responses to the Crown Prosecution Service (CPS) consultation on its draft Violence against Women Strategy and Action Plans.

It will cover:

- the background to the consultation;
- a summary of the responses to the consultation;
- a summary of the responses to the specific questions raised in the consultation; and
- initial conclusions and the next steps following this consultation.

Further copies of this summary and the consultation paper can be obtained by contacting:

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Copies may be obtained from the CPS website – www.cps.gov.uk.

Background

In November 2007 the CPS launched a public consultation on its Violence against Women Strategy and Action Plans. The Strategy aims to coordinate and improve the prosecution response to a range of crimes that fall under the umbrella of 'violence against women' (VAW). In launching the consultation, Sir Ken Macdonald QC, Director of Public Prosecutions, acknowledged that crimes of violence against women can have a devastating effect on the victims and their friends and family, and that the way these crimes are dealt with is a matter of great public concern. He emphasised the commitment of the CPS to ensuring that we offer the best possible service to such victims.

The CPS Violence against Women strategy and action plans were developed as a result of a commitment contained in the CPS Single Equality Scheme¹ and against a backdrop of national and international initiatives in this field. The CPS is committed to prosecuting these types of cases effectively and supporting victims in the process. The CPS Board therefore includes VAW in its top six priorities for 2007-08, and the VAW Strategy is one of the Director of Public Prosecutions' personal objectives for 2007-08.

In the consultation document, respondents were asked to answer twelve specific questions on the Strategy, Action Plans and the Equality and Diversity Impact Assessment, and one question asking for general comments or views. The consultation period ran until 28 January 2008. A list of respondents can be found at Annex A.

¹ Published in December 2006.

Summary of responses

1. In total, 44 responses were received to the consultation paper. The respondents can be divided into four categories as follows:
 - responses from non-governmental organisations, some with a particular interest in violence against women and others with wider interests (such as Trade Unions, Help the Aged, Toynbee Hall and the Salvation Army);
 - responses from statutory agencies, including the Police, Her Majesty's Courts Service, the Probation Service, the Forced Marriage Unit and CPS prosecutors; and
 - anonymous responses.

Details of the four categories of respondent are set out in Table 1.

Table 1: Respondent type

Summary of Respondents		
Category of Respondent	Number	Percentage of Total
Non-governmental organisations	30	68%
Statutory agencies	12	27%
Anonymous	2	5%
Total	44	100%

2. Not every respondent gave specific answers to each individual question in the consultation document. Table 2 below shows the total number of responses to each question and the percentage that represents of the total number of respondents, irrespective of type.

Table 2: Responses to individual questions as a percentage of the total number of respondents

Responses to individual questions as a percentage of all respondents		
Question	Number of responses received	Percentage of total number of respondents
1	29	66%
2	26	59%
3	29	66%
4	28	64%
5	29	66%
6	26	59%
7	27	61%
8	26	59%
9	30	68%
10	24	55%
11	6	14%
12	16	36%
13	19	43%

3. Each individual response has been reviewed by the CPS Violence against Women Team. Not all respondents followed the specific questions posed in the consultation document; however, the views of the respondents are evenly reflected in the above tables and the detailed analysis of the responses that follows.
4. The questions were drafted in such a way as to encourage responses to particular elements of the proposed Strategy. As a result, there was considerable opportunity for overlap, with many questions offering an opening to raise a range of issues.

Responses to specific questions

1. Have we placed VAW in the right contexts? If not, please suggest within what alternative or additional context we should place the issue.

There were 29 responses to this question. The overwhelming majority of respondents felt that the CPS had placed the Violence against Women Strategy and Action Plans in the right contexts. Several specifically welcomed the recognition given to the work of the End Violence Against Women Campaign and the acknowledgement in the Strategy of the fact that violence against women is a human rights issue.

Some of the respondents thought that the Strategy should also be situated in the context of local work; in particular in the context of the partnership work of Crime and Disorder Reduction Partnerships. Others commented that the Strategy should be viewed in a multi-agency context, and in the context of cross-government strategic working on this issue. Several of these respondents stressed the importance of the Strategy referring to cross-government delivery plans.

In the context of this question, a number of respondents expressed the view that the Strategy should have greater emphasis on the 'inter-sectionality' of gender with other diversity strands, such as disability, religion, age, sexuality, immigration status. 'Inter-sectionality' has been defined as: "how gender intersects with other identities and how these intersections contribute to unique experiences of oppression and privilege".² Several respondents thought that the Strategy should explicitly bring out the issues and additional barriers to justice affecting lesbian, bisexual and trans-women. Others thought that the Strategy should explain the specific issues of violence that relate to sex workers.

Two respondents felt that the Strategy should recognise the fact that violence against women is both a cause and a consequence of broader social, economic and cultural discrimination experienced by women.

One respondent commented that there could perhaps be more of a focus on the victim's perspective, with reference to the experiences and perceptions of victims of violence against women and to the work that is currently being undertaken across the criminal justice system to improve services provided to victims.

² Symington, A (2004) *Intersectionality: A Tool for Gender and Economic Justice*.

2. Is the UN definition, with the addition of pornography, the right definition to use? If not, which other definition would you like to see used?

Of the 44 respondents, 26 addressed this question. Twenty-five of the 26 respondents explicitly agreed with the use in the CPS Strategy of the United Nations definition of VAW with the addition of pornography. The only remaining respondent did not specifically state whether they agreed or not.

However, some respondents felt that the UN definition should be refined in a number of respects. For example, three respondents felt that financial abuse was lost in the UN definition. They felt that it should be incorporated into the Strategy as it represents another form of violence against women. However, others noted that financial abuse was incorporated within the Government-wide definition of domestic violence.

Several respondents felt that the term 'marital rape' in the UN definition should be changed to 'rape' to include a situation where a rape is committed within a family context against someone who is not married to the perpetrator.

There was some lack of clarity about what the sexual harassment at work strand of VAW covered; in particular whether this related to sexual harassment of CPS employees or whether it extended beyond the CPS. One respondent requested that the CPS clarified that pornography could include the abuse of women involved in the production of pornography.

3. Do you agree with our overall aims, objectives and success measures? If not, please suggest other aims, objectives and success measures.

There were 29 responses to this question. The majority (20) of respondents explicitly stated that they were supportive of the overall aims, objectives and success measures in the Strategy.

Several respondents specifically welcomed the focus on providing support to victims and witnesses. Others commented that more needs to be done to understand what women who experience violence want from the criminal justice system and what they would understand to be successful outcomes. They felt that traditional criminal justice performance measures are not a sufficient indicator of success; instead, they need to be used in combination with measures to reflect success for victims.

Four respondents suggested that another aim should be to reduce the rate of repeat victimisation of women. Others noted that an increase in women's safety, not just their satisfaction, should be a primary outcome in the CPS vision of success.

Further respondents expressed the view that the success measures should also include a way of identifying real attitudinal and behavioural change within the CPS and the wider society.

Several respondents felt that the aims, objectives and success measures should reflect the specific issues or 'barriers' that affect certain groups, for example the Jewish community, BME communities, disabled people, etc. One specifically suggested that there should be a measure of success relating to the prosecution and conviction outcomes in cases involving Black or minority ethnic (BME) victims.

Two respondents had some reservations about the ways in which the CPS would achieve its aims and objectives. One was concerned that the CPS might increase the number of guilty pleas and convictions at trial by not pursuing cases where there is an indication that no guilty plea would be forthcoming or where a conviction is not a certainty. Another queried whether the objective of increasing the number of offenders brought to justice would be achieved through pressuring women to pursue prosecutions where they are reluctant to do so.

Several respondents noted that the Strategy did not go into much detail about how the CPS would address the issues raised in the Corston Report concerning women as victims and offenders. They welcomed the fact that the Strategy acknowledged that women with histories of violence and abuse are over-represented in the criminal justice system, but felt that the CPS should further consider how it could work better with female offenders who have been victims of violence.

In relation to the broad measures of success, one respondent suggested that a specific outcome should be to increase *women's* confidence in the CPS, in addition to improving public confidence more generally. Another suggested that the CPS should aim to increase and *maintain* public confidence.

4. Do you agree with our reasoning about addressing VAW within a gendered framework? Are there any other reasons that should be included?

Of the 44 responses received, 28 addressed this question. The vast majority of respondents endorsed the recognition by the CPS that violence against women can best be addressed within a gendered framework, and welcomed this approach. None of the respondents stated that they disagreed with the rationale.

One respondent pointed out that there were obvious concerns in relation to the potential for male victims to feel under-represented and for this to result in under-reporting by them. This respondent accepted the validity of the gendered framework; however, they stated that there would be a need for careful and focused communication of the Strategy. Another respondent suggested that the Strategy should clarify that the policies and guidance for the individual strands of violence against women will remain gender neutral.

Two respondents welcomed the fact that the CPS noted that there are male victims of many of these crimes. Another respondent felt that a commitment to ensuring that the same level of service and support would be provided to male victims would be important.

A further respondent commented that they would find it useful for the CPS to clarify how the VAW Strategy will sit alongside other general policies that remain gender neutral.

One respondent agreed with the reasoning in the Strategy, but thought that the emphasis should be clearer that the gendered framework is as much about the gender of the perpetrator as the victim; that is, the focus is on *men's* violence against women.

Two respondents thought that another statement should be included linking violence against women to women's wider inequality – politically, socially and economically. Another suggested that the repetitive nature of violence against women should be added as a reason for the gendered framework.

One respondent suggested that the CPS should consider renaming the strategy, "Men's Violence against Women and Girls Strategy". They felt that this would more accurately represent the focus of the Strategy by putting the emphasis on the male perpetrator.

**5. Do you agree with the benefits identified of developing a VAW strategy?
Are there any other benefits that should be included?**

There were 29 responses to this question, 22 of which specifically stated that they agreed with the benefits identified. A number of respondents raised other benefits that could be included in the Strategy. These are outlined below.

Several respondents commented that another benefit might be better informed and better targeted sentencing (for example, further use of community based interventions for perpetrators such as the Integrated Domestic Abuse Programme).

Others stated that overall cost savings might result from the Strategy, by reducing the number of repeat victimisations and thus the number of interventions required.

Another respondent suggested that the CPS should draw attention to the linked benefits to women's health and mental well-being (for example, reduced rates of suicide and self-harm).

A number of respondents felt that the benefits of the VAW Strategy would be greater if a similar strategy was implemented across government. However, they felt that the CPS Strategy on its own could perhaps be a platform for more joined-up policy making and working across criminal justice agencies.

One respondent suggested that the Strategy should include further detail about *how* the prosecution process will be strengthened.

6. Is there any other evidence that should be included in the ‘Gathering the Evidence’ section?

There were 26 responses to this question. Several respondents expressed the view that the data included in the Strategy was useful. However, a number of gaps in the data were identified. These included:

- *Disability*

One respondent commented that it was regrettable that CPS data on disability was not fully available to inform the Strategy and Action Plans. The respondent felt that such data would be invaluable later in determining progress in relation to disability equality.

- *Violence against lesbians and trans-women / same sex relationships*

Two respondents noted that the ‘Gathering the Evidence’ section of the Strategy lacked any data about prosecutions involving violence against lesbians and trans-women, or violence in the context of same-sex relationships.

- *Repeat offences*

One respondent suggested that it would be useful to have further statistics to identify repeat crimes by the same perpetrator against the same victim.

- *Why cases are unsuccessful / why victims retract*

Two respondents raised the point that qualitative evidence about why cases are unsuccessful and why women retract their statements would prove helpful. A further respondent stated that the CPS should collect data on the reasons for victims retracting broken down by ethnicity.

- *Relationship between victim and perpetrator*

A number of respondents wanted to see more data on the relationship between the victim and the perpetrator.

- *Number of summonses*

One respondent felt that it would be beneficial to include evidence showing how many women are summonsed to court each year in cases involving violence against them.

- *Cases that do not proceed to prosecution*

Two respondents suggested that the CPS should work with the police to improve the data on the number of offences reported and the attrition rate from reporting to outcome. One of those respondents acknowledged that this would be an inappropriate figure for the CPS to use as a target (as it is not within the control of the CPS); however, they felt that the data would be useful

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for the purpose of aiming to improve the number of offences charged as a proportion of offences reported.

- *Pregnant women as victims*

One respondent suggested that data should be collected on the numbers of pregnant women who are victims of violence and on prosecution outcomes for pregnancy-related domestic violence cases, since research suggests that it is common for domestic violence to begin or intensify during pregnancy. The respondent felt that this type of data would help to inform policy to ensure effective responses to violence against women during pregnancy.

- *Victims of human trafficking*

Another respondent expressed concern at the lack of data on victims of human trafficking. The respondent felt that such data was crucial in order to build up a profile of victims that can be used to conduct preventative work and to raise awareness of human trafficking.

There were some more general comments; one of which was that the CPS should recognise that qualitative information is also useful for monitoring and evaluating performance. Another respondent specifically noted that the CPS data should be complemented by more evidence from the victim's perspective.

One respondent was aware of CPS plans to extend the analysis of data to include disability, religion and sexual orientation, and welcomed the fact that this would enable consideration of how different inequalities may intersect with gender.

7. Do you have any suggestions about how we might address the challenges we have identified?

There were 27 responses to this question. A range of suggestions were given about how the CPS might address the challenges identified in the VAW Strategy. Around half of the respondents felt that the training of specialist prosecutors and CPS employees would be of prime importance. One added that the CPS should also advocate specialist training in partner agencies such as the police. Another commented that staff should be trained specifically about the Gender Equality Duty.

Five respondents suggested that one way of addressing the challenges would be to improve the quality of cross-agency working and cooperation, and to share good practice across government departments. Similarly, one respondent recommended that government agencies should use the same monitoring systems at a national level so that the statistics gathered would be more cohesive.

Two respondents commented that the CPS should also work in partnership with specialist organisations in order to link with 'hard-to-reach' communities. This could take the form of asking for advice or guidance, raising awareness of the CPS, and seeking feedback from service users.

Several respondents noted that the further roll-out of Independent Domestic and Sexual Violence Advisors, Multi-Agency Risk Assessment Conferences, and the Specialist Domestic Violence Court Programme across other forms of violence against women would present an opportunity to overcome the barriers to successful prosecutions.

A number of respondents thought that comprehensive awareness-raising would be one means of addressing the challenges identified. One respondent suggested that raising awareness of VAW within the school curriculum should be built into the CPS Business Plan.

Several respondents commented that regular and effective monitoring to identify changes and improvements would be critical to ensuring that the Strategy does not lose impact and support. Similarly, another respondent emphasised the importance of publicising successful cases to improve the level of support for the Strategy. One respondent noted that the CPS would need to have a strong communications strategy in order to address the challenges identified.

Another respondent strongly recommended that the CPS should make available plenty of resources to create an effective system in order to address the lack of monitoring of the satisfaction and safety of victims of VAW crimes.

A further respondent suggested that the CPS should advocate or 'champion' the gendered approach across government. Another commented that challenges in ensuring 'buy-in' to the Strategy could be addressed by continuing to ensure that external stakeholders are fully engaged in the process. Those stakeholders would then be more likely to act as advocates for the Strategy with other external groups who might otherwise not support the Strategy.

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Two respondents suggested that CPS VAW champions should be appointed to coordinate and promote the work at a local level.

8. Do you agree with the priorities we have selected for the next 3 years? If not, what priorities would you prefer to see selected?

Of the 44 respondents, 26 responded to this particular question. The vast majority of those respondents agreed with the priorities the CPS had selected for the next three years.

One respondent noted that they would like to see more emphasis on 'victimless' prosecutions. The respondent expressed the view that many women would welcome being relieved of the burden of responsibility for these prosecutions.

Another stressed the importance of recognising the longer term holistic needs of victims of violence against women and taking steps to improve responses to those needs.

One respondent recommended that an additional priority should be set to advocate a strategic approach to VAW to the rest of government. Another welcomed the priority of linking across government, but thought that there should be further detail in the Strategy about how this might work in practice.

Other suggestions of priorities were also made; for example, reducing the length of time a case takes to proceed from charge to court, and keeping victims of VAW better informed about progress of their cases.

9. Do you agree with how we plan to monitor progress and success? If not, what other monitors of progress and success would you recommend?

Of the 44 respondents, 30 submitted responses to this question. The overwhelming majority of respondents agreed with how the CPS plans to monitor progress and success. A few suggestions were made for other ways to monitor progress and success.

One respondent asked whether there was scope to include a measure for monitoring attitudinal change in relation to VAW, perhaps broken down by specific groups (prosecutors, magistrates, judges, court staff, and the general public). Another suggested that the level of understanding displayed about VAW in the court room should be used as a measure of progress. The same respondent suggested that the 'court watch' undertaken by volunteers in the United States would be a potentially useful way of exploring the operation of courts in England and Wales.

A number of respondents particularly welcomed the monitoring of victim safety, satisfaction and views. One recommended that the CPS work with a range of specialist stakeholders in the voluntary sector to develop a safe and reliable system of contacting victims of sensitive crimes in order to do this. Another invited the CPS to consider measuring victim and witness satisfaction at different stages of their interaction with the criminal justice system as a means of monitoring progress and success.

One respondent stressed that the proposals for monitoring all strands of violence against women should be introduced as soon as possible. Another commented that the CPS should consider having joined-up evaluations or monitoring with other government departments.

10. We are interested in getting feedback from service users on this policy. Do you have any suggestions about how best we might do this?

There were 24 responses to this question. Respondents submitted a range of suggestions as to how the CPS could obtain feedback from service users on the Strategy in a sensitive and secure way.

Suggestions included:

- *Work with groups that have existing relationships with service users*

One of the main themes in responses to this question was that the CPS should seek feedback from service users through groups that have existing relationships with them. Several voluntary sector organisations volunteered to assist in facilitating this feedback.

A number of respondents emphasised that the CPS should meet with survivors of violence against women, in order to gain direct feedback. One suggested that the CPS could benefit from working with the Legal Services Commission in order to do this.

One respondent pointed out that this is an area that should be tackled very sensitively, as contacting service users can expose them to risks (especially where they have reconciled with the perpetrator). The respondent therefore recommended that feedback should be obtained through specialist voluntary sector organisations (such as rape crisis centres and refuges) that understand the risk implications of contact and have existing relationships with service users.

- *Feedback through members of CPS Project Assurance Group and External Consultation Group*

Two respondents commented that stakeholders are able to give feedback from service users through the CPS Project Assurance Groups and External Consultation Groups. One of those respondents also specifically welcomed the focus groups the CPS ran with stakeholders as part of the consultation process.

- *Online consultation*

A number of respondents advised the CPS to conduct an anonymous online e-consultation, similar to that conducted by the Home Affairs Committee (HAC) with survivors in the context of its inquiry into domestic violence. These were considered by some to be the best method of obtaining feedback as they are non-threatening and impersonal. One of the respondents – a voluntary sector organisation – suggested that it might be appropriate for a group such as themselves to devise the consultation materials to ensure that they are suitable for service users.

Otherwise, one respondent suggested that the CPS could make use of the material generated by the HAC e-consultation.

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One respondent noted that any online consultation should be accompanied by focus groups. They felt that online consultations can be discriminatory as not all service users have access to a computer.

- *Consultation events / open days for service users*

One respondent suggested that the CPS could hold consultation events where voluntary sector organisations and service users could provide feedback. The same respondent also suggested that the CPS could facilitate open days in court to ensure people understand the court process as well as to obtain informal feedback.

- *Questionnaires circulated by the police*

One respondent suggested that the CPS could provide questionnaires on the VAW Strategy to the police for them to circulate to women who contact them as a result of experiencing violence.

- *Focus groups*

A number of respondents recommended focus groups for service users. One noted that these would need to be held in venues that are accessible to service users, such as outreach centres or offices of specialist support services. Another suggested that the CPS could consider commissioning specialist voluntary sector organisations to lead the focus groups, as victims may feel more empowered to speak honestly with staff from such organisations.

- *Area Hate Crime Scrutiny Panels*

One respondent suggested that the CPS Area Hate Crime Scrutiny Panels could help to facilitate feedback from service users.

- *Incentives*

One respondent recommended offering incentives to female service users for their feedback.

11. Is there any part of the Strategy you strongly disagree with? If so, please identify which paragraph and provide a brief explanation as to why you disagree.

There were 6 responses to this question. Half of the respondents stated that there were no parts of the Strategy that they strongly disagreed with. The remaining three responses focused on specific parts of the Strategy.

One respondent recommended that the term 'child prostitution' in the list of strands of VAW should be replaced with 'sexual exploitation of children' or 'child / young person exploited through prostitution'. The same organisation thought that the CPS Strategy should reflect the complex differences between forced and voluntary involvement in selling sex. They felt that the CPS should clarify that the selling of sex does not intrinsically involve violence against women, but instead that there are many routes into the sex industry involving voluntary decision making. The respondent felt that by using the broad umbrella of 'prostitution' (instead of, e.g. 'forced prostitution'), the target priority was not aimed specifically at those women who are victims of exploitation.

Another respondent felt that the list of VAW strands should include human trafficking *per se*, rather than human trafficking for sexual exploitation, because of the fact that women may be trafficked for reasons other than sexual exploitation. This respondent also submitted that 'abuse of vulnerable adults' should be included as an additional strand of violence against women.

The same respondent also felt that the Strategy should clarify that some cases of female genital mutilation have been reported and investigated by the police, even though there have been no prosecutions for offences under the Female Genital Mutilation Act 2003.

12. Have you any other comments about the Strategy?

There were 16 responses to this question. The overwhelming majority of these responses were very positive.

Respondents welcomed the Strategy and conveyed their support for it; expressed an aspiration that this would be used as a model across government; highlighted the need for the Strategy; welcomed the gendered approach; and congratulated the CPS on the quality and comprehensiveness of the Strategy.

Other responses focused on the importance of working with other government departments in tackling VAW, and the need for an integrated Violence against Women Strategy across government.

13. Do you have any comments or views on the Equality and Diversity Impact Assessment?

There were 19 responses to this question. A number of respondents explicitly stated that they were pleased that the CPS had considered an Equality and Diversity Impact Assessment (EDIA) and that the data used to inform the process was comprehensive. One respondent recommended that this type of assessment should be conducted on an ongoing basis.

Two respondents regretted the fact that data on violence against women with disabilities was not included in the Strategy and EDIA. However, the same respondent appreciated the fact that the CPS acknowledged that there is currently very little data on disability in relation to defendants, victims and witnesses.

Two respondents noted that issues relating to lesbians and trans-women are absent from the assessment. A further respondent suggested that the EDIA needed to include more specific data relating to women involved in prostitution, as they felt there was a danger of conflating prostitution with trafficking for sexual exploitation.

One respondent invited the CPS to provide further breakdown in relation to its ethnicity data, as they considered that the CPS ethnicity descriptions were too broad.

Conclusions and next steps

We are grateful to all of those who responded to the consultation and the time they have invested in doing so. We recognise that this will have been particularly difficult for those who have been directly affected by violence against women.

The responses have demonstrated that there is widespread support for the CPS Violence against Women Strategy and for a gendered framework more generally.

The CPS is committed to the fair and consistent application of the criminal law so that offenders of violence against women crimes are properly dealt with; victims and witnesses are properly supported and protected; and society as a whole is safer.

It is clear from the responses to specific questions that there are a number of issues for us to consider. These include, but are not limited to:

1. A number of respondents called for greater emphasis on 'intersectionality' with other diversity strands. Although we refer to 'women' throughout the Strategy, the CPS recognises the diversity of women. The CPS is keenly aware that the experiences of women who are subject to violence may be affected by other factors or 'identities' such as their ethnicity, gender identity, age, disability, sexuality, religion or belief, or social class.

Whilst there may be some commonality of experience on the basis of gender, the interaction of gender with other identities can produce a substantively distinct experience of violence for each individual woman. This interaction also means that a woman may encounter additional barriers to accessing justice. For example, a lesbian woman might be anxious about reporting violence because of a fear of homophobia. A disabled woman might find it difficult to report violence as a result of her disability and because of a fear that there are no suitable services for her.

The CPS considers that an understanding of the interaction of different identities, or 'intersectionality', is crucial to tackling violence against women. We appreciate that women's distinct experiences require specific responses from the CPS. We therefore intend to include a section in the Strategy document explaining this. We will also ensure that the VAW guidance and training address the diverse issues faced by women.

2. A number of respondents felt that the CPS should be more explicit about the multi-agency context of the VAW Strategy. The CPS envisages that the Strategy will be underpinned by effective partnership working at both a local and national level. Each individual strand of VAW work will therefore link with relevant government-wide delivery and action plans (e.g. the National Domestic Violence Delivery Plan, the Sexual Violence and Abuse Action Plan, the UK Action Plan on Human Trafficking, and the UK Prostitution Strategy). A new sub-section will be inserted into the Strategy to reflect the importance of the multi-agency context of the Strategy.

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We also intend to build upon our existing relationships with statutory and non-statutory partners to improve our prosecution response, increase public confidence in the CPS and criminal justice system more widely, improve support for victims, and address disproportionality.

3. Several respondents suggested that all references to 'male(s)' and 'female(s)' be changed to 'men' and 'women' in the Strategy document. The CPS will change these references where possible, in order to include transgender individuals. We will also clarify that references to 'men' and 'women' cover boys and girls.
4. One respondent requested that the Strategy clarified that the policies and guidance on each of the individual strands of violence against women will remain gender neutral. All of the individual policies will be applied fairly and equitably to *all* victims of crime, irrespective of gender. This will be reflected in the revised Strategy.
5. Concern was expressed by some respondents about the fact that the United Nations definition does not explicitly cover financial abuse.³ Whilst the definition does not explicitly include financial abuse, the definition is broad and the list of types of violence covered is non-exhaustive. The definition refers to "psychological violence", "deprivation of liberty" and "violence related to exploitation", all of which could encompass financial abuse. Additionally, the Government definition of domestic violence specifically incorporates financial abuse. The CPS cannot amend the UN definition to explicitly cover financial abuse of its own volition.

We consider that the UN definition is appropriate for the purpose of the CPS Strategy, as it is wide and flexible enough to cover most forms of violence against women. It will therefore be retained in its current form.

6. Several respondents were unclear about the scope of the 'sexual harassment at work' strand of the Strategy. The CPS intends to address sexual harassment at work in relation to its staff only, as an issue relating to human resources. Sexual harassment in other workplaces is beyond the remit of the CPS. However, where sexual harassment in other contexts amounts to a criminal offence, it may well be captured by one of the other strands of the Strategy (e.g. sexual offences).
7. A number of respondents expressed a desire to see human trafficking *per se* included in the Strategy, rather than only human trafficking for sexual exploitation. The CPS acknowledges that women trafficked for labour or marriage may experience violence as a means of control. As one respondent pointed out, there have also been reports of women trafficked for domestic labour being subjected to sexual harassment and assault as part of this experience. We will therefore adopt a broader definition of trafficking for the purpose of the Strategy; however, the focus of the Strategy will be on human trafficking for sexual exploitation.
8. A number of respondents requested that the CPS put further emphasis in the Strategy on victim's safety, as well as their satisfaction and support. The Strategy emphasises that measures of success need to address support, safety and satisfaction of victims as well as bringing perpetrators to justice. However, on a number of occasions we have included references to 'satisfaction and support', but not safety. To ensure consistency in the Strategy document, we will

³ It should also be noted that the Government definition of domestic violence explicitly includes financial abuse.

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therefore insert references to victim safety in the Strategy where these are absent. It is hoped that this will clarify on the face of the document that the victim's safety is an important concern for the CPS.

9. The CPS welcomes the numerous helpful suggestions received about how best to gather feedback from service users on the VAW Strategy. We will consider these when we come to develop systems to measure victim satisfaction, safety and/or access to support in 2008-09.
10. As the summary of responses to specific questions showed, a number of respondents identified gaps in the CPS data relating to violence against women. The CPS introduced enhanced electronic monitoring in 2007 in relation to domestic violence, to gather information on victim retractions, what happens to a case after a victim retracts his or her statement, the relationship between the victim and defendant, whether the victim and defendant are of the same sex, and whether victims are referred to specialist services. The first set of data from these flags, along with the first data on disability, will be available in summer 2008. We will consider whether this monitoring can be expanded to cover other VAW strands.

Additionally, an important facet of the VAW Strategy is to monitor VAW crimes, set targets and address any data gaps. The overall national action plan for violence against women (which will be published alongside the final Strategy) shows that the CPS intends to establish a VAW 'indicator', with a target to reduce unsuccessful outcomes in VAW crimes, on a phased incremental basis from 2008-09. This will be a means of gathering further data on each strand of violence against women. A VAW report will be published in the second quarter of 2008-09 with the results of the 2007-08 data collection, and on an annual basis thereafter.

The CPS also recognises that it is important to improve the flagging of VAW crimes in order to make the data more reliable. Where this is a particular concern, the operational action plans for each individual strand of violence against women address this issue with a task to increase the correct application of the Case Management System (CMS) flags.

The consultation criteria

The six consultation criteria are as follows:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the time scale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

These criteria must be reproduced within all consultation documents.

ANNEX A

Responses from non-governmental organisations

1. CPS Domestic Violence Project Assurance Group / External Consultation Group
2. Greater London Domestic Violence Project
3. Standing Together
4. CPS Focus Groups (consisting of specialist service providers from a range of agencies working with survivors of domestic violence and sexual violence)
5. Keith Kerr (formerly of the Attorney General's Race Advisory Group)
6. Equality and Human Rights Commission
7. Fawcett Society
8. Help the Aged
9. Stonewall
10. Women's Resource Centre
11. UK Network of Sex Work Projects
12. Voice UK / Ann Craft Trust / Respond (joint response)
13. Birmingham and Solihull Women's Aid
14. Welsh Women's Aid
15. Cwm Cynon Women's Aid
16. Communication Workers' Union
17. Toynbee Hall
18. RESPECT
19. Eaves Housing / Poppy Project
20. Refuge
21. Jewish Women's Aid
22. National Childbirth Trust
23. UNICEF UK (background information only)
24. End Violence Against Women
25. Salvation Army
26. Soroptimist International
27. Ashram Housing Association
28. Salford City Council (Community Safety)

Responses from statutory agencies

1. Her Majesty's Courts Service, London
2. CPS London South Sector (focus groups)
3. CPS Wiltshire
4. Metropolitan Police Service
5. London Probation
6. City of London Police
7. CPS Direct
8. CPS Greater Manchester
9. CPS Victim and Witness Care Delivery Unit
10. Her Majesty's Courts Service
11. CPS West Midlands
12. Forced Marriage Unit

Anonymous (X2)