

Consultation Response

May 2009



Response to Together We Can End Violence Against Women and Girls – A Consultation Paper HM Government

About ROTA

Race on the Agenda (ROTA) is one of Britain's leading social policy think-tanks focusing on issues that affect Black, Asian and minority ethnic (BAME) communities. Originally set up in 1984, ROTA aims to increase the capacity of BAME organisations and strengthen the voice of BAME communities through increased civic engagement and participation in society.

ROTA's Articles of Association state that the charity is set up "to work towards the elimination of racial discrimination and to promote equality of opportunity, human rights and good relations between persons of different groups".

For historical and demographic reasons, our work prioritises London, but our activities and a number of our projects have national and international significance. To this end we work in close partnership with our membership and others interested in race equality, human rights and the promotion of good relations.

Our presence in London is enhanced by our two regional networks, MiNet and HEAR. **MiNet** is the London focused BAME network of networks, which joined ROTA in 2002 to strengthen the voice for London's BAME Third Sector in the development of regional policy.

HEAR is London's only pan-equalities and human rights network, which joined ROTA in January 2005. Its focus is on issues affecting London's equality and human rights third sector organisations.

ROTA definition of BAME and Approach to Race Equality

ROTA works on social policy issues that have an impact on race equality and BAME communities. We use the term BAME to refer to all groups who are discriminated against on the grounds of their race, culture, nationality or religion. The ROTA definition which includes but is not exclusive to people of African, Asian, Caribbean, East European, Irish, Jewish, Roma and South East Asian decent. ROTA adopts a holistic approach to race equality and works in partnership with other Third Sector organisations that complement its expertise and have a similar vision

Methodology for this response

ROTA's policy work is evidence based in the sense that everything we do is informed by the views and real life experiences of BAME communities and the organisations that are set up to serve them. We collect evidence through:

- Action Research (qualitative and quantitative surveys)
- The ROTA based networks of HEAR and MiNet
- Events, consultations and conferences
- Working in partnership with others.

This response is based on evidence collected by ROTA's two year (2006-2008) youth led study into youth violence, Building Bridges, ROTA's Female Voice in Violence (FVV) study into the experiences of women and girls affected by, and associated with gang violence, and as well as ROTA's in-house expertise on Race and Gender.

Attached to this submission;

- Building Bridges Final Report
- Building Bridges Post Conference Report
- Female Voice in Violence Project Brief
- Presentation on Women and Gangs made to the Mayor of London November 2008

About the Strategy

ROTA welcomes this cross government consultation on how to address violence against women and girls. A multi-agency response is the only way in which violence against women can be addressed – coordination at a policy level across departments will set an example for service providers on the ground.

From 2006-2008 ROTA facilitated a youth-led research project into gangs and the use of weapons in London, 'Building Bridges'. Of all those young people interviewed for the research over 40% were girls and of these a significant number identified ways in which serious youth violence and gangs affected them. Following this, ROTA developed the Female Voice in Violence project which has been running since March 2008. The project is currently collecting the views of as many women as possible who may be affected by, or associated with, serious youth violence. It is the aim of the project to design possible multi-agency responses to risks that they may face, as well as work out ways in which to consider the role of women when developing strategies to tackle gang violence.

This consultation response draws upon initial findings of FVV as well as wider ROTA evidence on BAME women and violence.

ROTA is concerned at the lack of discussion on gangs in the consultation document, as well as the limited consideration for peer-to-peer violence and sexual violence. Both FVV and BBP have identified gender-based violence amongst young people under the age of 16 as well as the use of rape and sexual violence in gang conflict, as salient issues that need to be addressed. Considering that most youth plans feature references to serious youth violence and/or gangs, it is concerning that a document which considers violence and girls does not reflect substantially on this.

ROTA research carried out under FVV has identified the following as concerns for women and girls affected by gangs and serious group offending:

- a. Mothers can be victimised if they try to intervene with their son's offending behaviour. Victimisation includes vandalism and other damage to their home, assault, sexual violence and rape

- b. Mothers and sisters can be assaulted as a reprisal or a warning to their son/brother if he is gang involved or being coerced into gang involvement
- c. Sisters are manipulated into relationships with gang members who are enemies of their brothers so as to antagonise or disrespect him
- d. Girls are sometimes passed around a gang and have sexual intercourse with a number of them. There is general lack of sympathy for girls who are in this situation from their peers and it seen as their own individual choice regardless of their age
- e. Girls often aspire to become girlfriends or 'wifey's' of gang members which places them at risk of rape as retaliation or a warning to their boyfriend
- f. Girls may inadvertently encourage and endorse gang violence by their attraction to that lifestyle; such girls come from a variety of backgrounds and abilities.
- g. Girls may be used to carry weapons, drugs and stolen goods for a gang or their boyfriend if he is a gang member
- h. Girls would often discourage their boyfriends from acting as informants for fear that they will be targeted if he receives witness protection.
- i. Girls may get pregnant intentionally in a bid to secure a gang member who has an influential or respected role.

The above are just a few of the initial FVV findings. All the findings will be presented at roundtable discussions from September until November 2009 and launched in a report with recommendations in February 2010. Contact Carlene Firmin at carlene@rota.org.uk for further details.

The role of specialist third sector organisations such as those in place to support BAME women, or older women, is crucial in delivering any strategy that comes out of this consultation. In light of the community cohesion agenda it is crucial that this strategy acknowledges the positive role that such organisations play in bridging the gap between generic services and isolated communities. Furthermore, the expertise that comes from the specialist third sector is crucial in identifying need most accurately and ensuring that local priorities match local need. ROTA research has identified that frontline equality organisations are the only ones that can *meaningfully* engage isolated communities and bring them to a position where they can take part in, and shape wider public and social life. The BAME Third sector delivers a range of activities and often life-saving services including crises and longer-term accommodation, counselling, advice and representation. The 2008 HEAR report 'Gaps and Solutions: Supporting London's Equality Sectors' identified that specialist equality organisations work in all fields such as sustainable development, health, culture, criminal justice, employment, education and transport. They play a key role and have invaluable experience in responding to inequality by:

- Meeting specialist need: in providing services to meet specific needs that mainstream service providers are either unaware of, or find difficult to understand and often do not address.
- Strengthening community cohesion: by building the confidence of people such as refugees from the most marginalised communities, frontline equalities groups enable them to feel strong enough to mix with others communities.
- The group's staff and volunteers may also become well known and are well positioned to mediate tensions that may arise between communities;
- Implementing Government policies: government relies at times on frontline equality organisations to help deliver, for example, its human rights, equality and community cohesion agendas.
- Providing employment and volunteering opportunities: the Learning and Skills Council has reported that the third sector in general employs higher proportions of

BAME people, women, disabled people and people with long-term illness and graduates.

- Employment and volunteering opportunities provided by equalities groups help people from the most marginalised communities move into the formal economy or from voluntary to paid employment.

Many BAME and equality groups can work in isolation and are not always involved in the decision making and consultation processes which are accessed by more mainstream organisations and so there is a need to ensure that there is a strategic and co-ordinated way to bring these issues to the attention of key stakeholders.

The ROTA response is divided into eight parts;

1. How should schools encourage young men to treat women and girls with respect, and not resort to violent behaviour?
2. How do social attitudes towards girls and women affect the problem of violence against women?
3. Are we doing enough to protect and support children affected by adult violence? Who's looking out for them what do they need?
4. How can we all better pick up on, and respond to, early signs of violence?
5. What kinds of services should you expect to receive from the health service and/or social services if you were a victim of violence?
6. How can central government, local government and other service providers best work together to promote better consistency and quality of provision in services for victims of violence against women across England?
7. How can central government, local government and other service providers best work together to promote better consistency and quality of provision in services for victims of violence against women across England?
8. The Government Strategy- next steps.

How should schools encourage young men to treat women and girls with respect, and not resort to violent behaviour?

What are your views on the role of school in helping children and young people to develop the values and skills that they need as they grow into adulthood, including mutual respect, right and responsibilities, gender equality, and the ability to manage their feelings and emotions?

ROTA research has found that schools are crucial in offering a preventative intervention for *all* young people to develop personal, social and emotional skills. Within this skill set there needs to be both an acknowledgement and an understanding of issues related to gender equality, alongside other equality issues such as age and race; with clarity about where these equality issues are unique and independent of one another, and where they are interrelated. The work outlined in the consultation document on the use of SEAL and PSHE to discuss healthy relationships is one way of achieving this.

Entering into unhealthy relationships is one way in which girls are often victimised and placed at risk via gang association. Entering into these relationships in exchange for status, protection, expensive gifts or aspiring to a 'bling' lifestyle places is seen as a fair exchange. Having discussion with girls about why they enter into a relationship and what is important to them is one way to get them questioning these types of decisions. It is also worth noting that whilst violence within relationships should be questioned, and is raised in the document, it is also important to consider relationships with men and boys who are violent towards other people. ROTA research has found that girls will openly state that they are attracted to boys who are involved in violent activity although not violence towards their partners but violence towards their peers. This too is unhealthy and needs to be challenged.

ROTA's two year, youth-led, study into gangs and weapons use in London, Building Bridges, featured specific training into human rights and ethical fitness for all of the young research volunteers who took part. This training was essential for them to place the violence that was taking place within a context of rights and responsibilities. Looking at youth violence in this way enabled the young researchers to highlight the impact of serious youth violence on women as a gap in current service provision and strategy. Identifying this gap allowed ROTA to develop the Female Voice in Violence project which looks specifically at how serious youth and/or gang violence affects women and girls.

In order for schools and other educational providers to offer this type of preventative intervention, it must be woven into the curriculum. However, it must be done so in a way that the school and teachers are able to contextualise the general themes and make them applicable to the lives of the young people whom they are teaching.

Furthermore, the role of schools, while central, cannot be seen as the only way to educate children and young people about Human Rights. The UK as a whole is yet to fully embrace or understand the message of the Human Rights Act or to respect its authority. Other public sector bodies, and private organisations, especially the media, need to be held accountable for determining the extent to which we all recognise one another's human rights and what this means. As this consultation document highlights, at the root of all violence against women is gender inequality. This gender inequality can be identified in social attitudes and actions and these too must be challenged if we are to facilitate any work conducted in schools.

Should schools supplement this broader development by explicitly helping young people understand issues such as domestic violence and sexual violence against women and girls?

Schools, and other education providers, should explicitly cover the issue of violence against women and girls, using specific examples such as domestic and sexual violence. As stated earlier, it is important that teachers are enabled to place what they teach within a context so that young people understand why and how the issues raised are important to them. Asking young people directly how violence affects them in their lives may also raise further examples of violence against women and girls that this document currently neglects. For example, the impact of serious youth and gang violence on both women and girls as mothers, sisters, partners, friends, associates of gang members as well as female gang members themselves is not raised in this document. And yet we see serious youth violence as a priority for government at both a national and regional level. Is this because it is seen as an issue for boys and men and not for all young people? ROTA's Female Voice in Violence (FVV) project has identified that such violence has a significant impact on the lives of girls and women. Furthermore, that much of this impact is facilitated by unequal attitudes towards, and treatment of, girls and women by their peers and by society in general. The fact that up until this point it has not been recognised as an issue of importance for women and girls is evidence of that in itself. Schools should be enabled to explicitly raise such issues.

In addition, it is important that this work is conducted with *all* schools. As soon as it becomes an optional subject then it will often be avoided for fear that schools teaching it will be labelled as 'failing' or 'problematic'. Furthermore, the FVV project has identified that violence against women and girls affects a whole range of young people who cannot necessarily be targeted. They often suffer in silence and do not always meet a checklist of possible risk measurements. Unless schools are able to work with practical examples then it may be possible for young people to distinguish between violence that they may experience or commit, compared to the violence being discussed. All young people should be aware of violence against women and girls and not just those who are seen to be direct victims of it.

What teaching works on this already?

With regards to the impact of gang and serious youth violence on women and girls there are a few third sector organisations delivering this type of work. Organisations working in the youth sector and women's sector provide educational programmes for young people affected by serious youth violence and a number of these also offer women focused programmes. Little Miss Raw (delivered by Involve), Girls Only (delivered by Foundation 4 Life); Safer Choices (delivered by the Nia Project) are examples of projects which all focus on the impact of serious group offending on women. While they do not all currently have the capacity to deliver in schools, with the appropriate support they have the potential to offer such services, and serve as best practice examples of covering such specialist issues. Likewise, it is important for schools to work more closely with the third sector, as very often they are better placed to cover some of the specific issues of violence against women and girls. Many who work in this specialist field have already experienced some form of violence against women or have worked directly with survivors. Support from a third sector organisation can help support teachers, especially with managing the emotional nature of the subject matter and the potential impact that it may have on some students.

How well is sexual bullying being tackled in schools? Is the necessary support provided to schools to do this?

At present sexual bullying is not being tackled well in school, according to the initial evidence that has been collected by FVV. With regards to gangs and serious youth violence, the use of sexual bullying within schools is a significant concern for a number of girls. The use of intimidation via sexual threats, and the use of sexual assault and rape as revenge attacks or warnings on girlfriends and sisters of gang members is a reality for a number of girls and one which is yet to be addressed in the school setting.

This is a serious concern for all educational providers including Pupil Referral units. At present there isn't the necessary support provided to schools to even address the concerns, let alone tackle them. The risks associated with violence that is gang related can also raise the level of victimisation for the girl involved as well as anyone who attempts an intervention. The lack of activity up until very recently on this type of violence has meant that across all services, not just educational, there has been a lack of awareness raising or coordinated action. ROTA's Building Bridges Project (BBP) saw young women claim that during Operation Blunt periods they felt at greater risk of sexual assault as it was a safer weapon to use given that stop and search would not identify it. Likewise, the heavy focus on the use of knives in school has seen a response aimed at addressing the weapon itself and not the violence underlying it. For girls who experience sexual bullying that is gang related, knife searches will not offer any form of support. Furthermore, when a girl's is gang associated, FVV research has shown that official institutions such as schools or the police are no longer recognised as being bodies to protect them. They feel at increased risk given that if they disclose information they open up intelligence on a gang that could get them into greater trouble, and secondly as they are associating with someone involved in criminal activity they assume that what happens to them is in some way their own responsibility. Peer to peer sexual violence should be a high priority for all government departments and at present there is not sufficient recognition of it in this consultation document. These attitudes are touched upon in the consultation document when looking at the Home Office's opinion poll which took place in February 2009. The attitudes identified in this document, which held women partially responsible for rape, mirror much of the interim findings of FVV. However, in the case of gang affected girls a number of them will be young, in some cases as young as 13 and 12 and the attitude towards rape is the same.

Therefore ROTA welcomes the statement in the document that the government is 'concerned that violence against women and girls is seen as acceptable in some audiences and under some circumstances'. What we would like to see is due consideration of what this means for women and girls who are gang affected.

What more could be done to help young women and young men to challenge negative perception or behaviour among their peers?

The focus groups used in the FVV research demonstrated that bringing such contentious issues into a focus group setting allowed the young women involved to challenge one another on their ideas in a way that they felt safe and secure. As in any group work, initial risk assessments had to be carried out, along with providing a pathway for those involved to follow up any concerns that they had once the discussion had finished. If we are asking young people to challenge one another then we must offer them a safe and protected environment in which to do so, otherwise we create the potential of opening them up to further risks.

One must also ask whether more could be done to challenge negative perceptions of, and behaviour towards, women and girls in general. Empowering young people to challenge

these issues not only with their peers but with their families and others who they may come into contact with is equally important; as well as enabling them to challenge such attitudes within themselves. The fact finding exercise suggested in the consultation document is another method by which we can gain an understanding of the impact of the sexualisation of young people on how they view themselves and one another.

How do social attitudes towards girls and women affect the problem of violence against women?

How can we best challenge the perceptions that allow people to stay silent on violence against women and for it to be accepted in various sectors of society?

With regards to women who are affected by gang and serious youth violence, we can firstly challenge its acceptability by honestly addressing it. Up until now most policy documents put in place to challenge youth violence fail to fully recognise or address the impact that it is having on women and girls across the country. For as long as government and service providers stay silent on this form of violence, we cannot expect those who experience it to come forward.

Furthermore, initial FVV findings illustrate that girls who are affected by violence as a result of their gang association accept it to the extent that it is part and parcel of a lifestyle that they have opted into. Therefore, while they may seek retribution or expect their brother/partner to do so on their behalf, they do not see it as a matter for the state regardless of their age. Therefore if a girl of 13 is being sexually exploited within gang the majority of FVV respondents so far state that this is her own choice and therefore not one which any public service would be interested in intervening. They make clear distinctions between a woman who is raped by a stranger on the way home from work and a woman who is raped because her husband is involved in serious group offending. To an extent they are more sympathetic to mothers and sisters as their association may be less of a choice than someone who is a girlfriend or a friend.

How can we challenge cultural beliefs which promote forced marriage, crimes committed in the name of 'honour' and female genital mutilation?

Providing sustainable funding to specialist BAME Womens led organisations is the best way to challenge any form of violence against women that is justified on the grounds of tradition or culture. They have the level of expertise and understanding of the specific issues and are therefore best placed to challenge them.

It is important to note that if we are to refer to culture as a cause of violence against women then we must be clear that all forms of violence against women are in some form linked to perceptions and attitudes held by groups of people. Therefore, British Society must also accept the extent to which its own cultural attitudes facilitate all forms of violence against women. It is not exclusively BAME or religious groups who have cultural beliefs. The types of violence highlighted in the question are often justified on 'cultural' grounds and it is this that must be challenged. But the links between culture and violence against women extend beyond this and it is important that that too is acknowledged.

Is there a link between sexualised images, perceptions and actual violence?

There is a link between sexualised images, perceptions and actual violence to the extent that the images can create a normalised perception of how women are to be viewed in society which in turn can make the violence inflicted appear more acceptable. Respondents to FVV research have extremely negative views of some girls and women and argue that when sexual violence is used against them that they often bring it upon themselves as that is 'all that they are good for'. The names used by girls to make reference to other girls who have had sex with numerous men is often very disturbing and endorsed by girls as appropriate. All of this language and imagery used is done so by the mainstream media which increases the extent to which we become used to hearing and seeing it. FVV uses examples of lyrics in focus groups to get the views of young women on what is said. For the majority of them what is said is 'rude but true' and 'if girls are gonna act like that then people are gonna sing about it – that's just the way that it is'. (Lyrics Attached to this submission).

How can we encourage peer-to-peer support to challenge violence against women and girls?

Peer mentoring, and peer-to-peer support, has been extremely effective in tackling the behaviour of boys associated with serious group offending. Training should be offered to young people who are interested in offering peer support so that they can manage any risk that may be created by their intervention. The benefits of peer-to-peer support have been demonstrated in work with boys affected by serious youth violence. Good practice models of this work should be conducted with girls to see if the effects are the same. Organisations who do offer peer-to-peer support for girls such as Lambeth X-it report positive outcomes.

Are we doing enough to protect and support children affected by adult violence? Who's looking out for them what do they need?

What are your views on whether staff in all services that work with children and families have knowledge and skills to identify, assess and refer children who are affected by adult violence?

At present staff across public services do not have the knowledge, skills or resources to identify, assess and refer children who are affected by serious youth violence. It is concerning that the question is so specific to adult violence inflicted upon children as peer-to-peer exploitation and serious youth violence should be of equal concern, especially as there is no specific section for this form of violence in the document.

The lack of policy awareness and action on this issue is indicative of the fact that if policymakers aren't looking out for girls in this respect, then it will not facilitate practitioners to either. Policymakers must set an example and a standard of expectation for the type of work that they should be a consideration. If it is not a priority in policy then there is no example of how the work is expected to develop at the grass roots level.

Are those staff working together effectively (both within and across organisations) to protect and support children?

Multi-agency level working is crucial for supporting girls who are experiencing violence. At present there are a number of problems with the way that this works when trying to support gang affected women and girls.

Firstly initial findings of FVV have identified difficulties in social services working with youth offending teams if they identify a girl who is at risk due to gang association, especially with confusion around consent and when there is grounds to intervene. Given the ages of some of the girls involved it is important for probation and youth offending services to work more effectively, a number of girls who are presenting as a concern for youth offending may be in relationships with gang members under probation. Schools need to be engaged across the board whereas at present there is a stigma for a school to engage in this type of work, even if it is preventative. Health services, especially CAMHS and sexual health services need to work more closely with all services who work with gangs as women may access them first.

However, until all of the service providers are individually aware of the issues for women and girls who are gang affected, as well as the needs that this association creates, it is hard for partnerships to be formed. The first steps for all stakeholders should be to work out where these needs impact of the work that they deliver, or the priorities that they work towards, and once they have identified their specific, these can be better fed into a multi-agency model. Likewise, once services are clear on what they can and can't deliver the role of the third sector can be better understood and partnership working between the sectors can be better facilitated.

What are the main gaps in current provision?

There is currently a massive gap in provision for girls who are affected by gangs and serious group offending. As children there are safeguarding procedures that could be applied to a number of these girls and these procedures are outlined in a current DCSF consultation on how to safeguard children affected by gangs. However, the difficulty with this is that even this document only looks at those who would be most active as girls within gangs, or those who are sisters. In general, provisions that are put in place to support young people are, in the main, targeted at young boys and therein lies the problem. As the criminal justice system has taken the lead on responding to gangs, and have had the offenders as their main focus for intervention, provision for those on the sidelines is often forgotten. Specific examples of gaps are as follows:

- Awareness by all service providers on the variety of ways that gangs and serious group offending affects girls and the different needs that this can create
- Counselling and mental health service support for young girls affected by the murder of a friend/boyfriend – how to deal with bereavement
- Clarity on what 'consent' is and how this is managed when girls are having sex with gang members
- Risks to girls when boyfriends are informants or are incarcerated
- Funding of third sector projects that currently reach out to these girls across the youth, women and gangs sectors.
- BAME specialist services for girls
- Limited number of rape crisis and haven centres

How can we all better pick up on, and respond to, early signs of violence?

How could public service providers play a stronger role in identifying and responding to the early signs of violence against women and girls?

In relation to VAW resulting from gangs and serious group offending, public service providers need to consider girls who are associating with gang members. At present the youth service and criminal justice system are so focused upon the gang members with whom they are working that they may miss vital opportunities to intervene with the girls to whom they are associated. Therefore, when building intelligence on gangs and working with members, it is important that public service providers also do the same with the girls who are on the periphery of this violence. Working with the boys on their attitudes to the girls that are associating is also important. Learning from third sector organisations who currently deliver this type of work such as Nia and Foundation 4 Life is also important so as to not reinvent the wheel.

How would you like to access information (and what would you need to know) on how to support a friend, colleague or partner if they told you that they had been a victim of violence?

It is important to actually begin to provide information on how to support women and girls affected by gangs and serious group offending. At present there is limited information for mothers of gang members with the focus on how to spot the signs of your son being gang involved, rather than what to do if he is, and there is little to no information on what to do if you are a partner, friend or sister of a gang member. As such, any formal information for what to do if you know a women or girl who is gang affected is negligible. Offering some clarity on what support is available to these women would be beneficial to those affected, but also for the government to clearly see where there is knowledge/expertise and where there are gaps in service provision.

Places to access this information would be schools and all alternative educational provision, nurseries, doctor's surgeries, youth clubs, youth services and women's groups. It is important to work in partnership with the third sector to distribute this information.

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What kinds of services should you expect to receive from the health service and/or social services if you were a victim of violence?

What would form a range of high-quality services for victims of violence against women in every local area? How would these services be commissioned?

A range of high quality services for women affected by gangs and serious group offending would initially consider the different types of women and girls that could be in need and attempt to match that. Therefore there should be services available for mothers of gang members, sisters of gang members, partners of gang members, associates of gangs and female gang members, should they want support to either leave this type of offending or feel victimised. A number of women who are involved in gang violence are facing intimidation and victimisation and any service provision would also take this into account. All services would have to consider how they are to manage risks of women and girls who access these services and how to put their safety first.

Such services should be delivered in partnership with the third sector or preferably with a number of third sector only provision. This is recommended to ensure the independence of the provision and increase the likelihood that women and girls would trust the service enough to approach it. Interim findings of FVV suggest that the independence of service provision is crucial if those affected are not to assume that information they disclose will be relayed back to the police.

Furthermore such work should be delivered in women only spaces where appropriate and take into consideration any specialist types of services that should be offered. The needs of BAME communities, for example in London, need to be considered differently to other communities in other cities. Taking local need as a driver of how services are commissioned is crucial and should be assessed via a mapping of gangs in the local area alongside a mapping on current service provision. The public sector needs to work in partnership with the third sector in order to assess local need as they are often the most connected with the grass roots reality. Furthermore, working directly with service users to evaluate the success of services, rather than stringent monitoring of outputs, would ensure that these services are sustained or improved where necessary.

How would existing services improve their response to victims of violence against women?

At present there are little to no services available to women and girls affected by gangs and serious group offending. Initial steps to make improvements would be to assess existing services to intervene with gang violence in general, and then to conduct gender impact assessments on these measures. Following this assessment and identification of gaps services can be put in place. More importantly, due to their lack of consideration for women affected by gang violence, a number of strategies in place threaten to place women and girls at increased risk. All gang intervention and disruption projects and proposed visits to the homes of gang members all fail to really consider how these projects will affect and potentially increase risks to female associates. Furthermore, witness protection schemes do not consider risks to girlfriends and female associates of informants; the current impact of this being the girls do not want to be in relationship with a potential 'snitch' for fear that they would face reprisals if their partner became an informant. Until gang interventions offered by services consider these issues they will not be able to improve responses to women and girls affected by serious group offending.

Services which currently support some women affected by gangs and serious group offending such as rape crisis centres are chronically underfunded and not always provided locally. This requires women and girls to travel to support services which could increase their victimisation. More organised support to ensure services meet need locally is crucial in order to avoid this.

The role of social services and health services should also be strengthened given the age of those affected, and the mental and sexual health implications of the violence that

victims may experience. Training for frontline service providers into the types of risk and the specific needs, and knowledge of what an appropriate response would look like is crucial in order to ensure that such services fulfil their role.

Are there specific services that should take a leading role?

The women's third sector should lead the response to this type of violence in partnership with the youth third sector, BAME third sector and gangs projects. Such a third sector lead should work in partnership with health and social services in the main, as well as the youth service and criminal justice system to ensure maximum impact for all those involved. It is crucial that such interventions are adapted depending on who they are aimed at – for example, mothers may access different services to girlfriends under the age of 18. These differences mean that there cannot be any uniform approach to offering support and those who lead should be those who are potentially accessed by all types of women. Specific need and expertise would then bolster this. Therefore, if the women's third sector and the health service lead interventions, BAME organisations, youth organisations, gang organisations, social services, the youth service etc would be brought in where the need dictated that this should be the case.

How can central government, local government and other service providers best work together to promote better consistency and quality of provision in services for victims of violence against women across England?

In the section of the consultation which considers what has already been achieved there is a clear gap in policy development for girls and women affected by gangs and serious youth violence. Action plans make reference to sexual violence, domestic violence, forced marriage and human trafficking. And while there are ways in which gang associated violence can be linked into some of these, there is nothing explicit on this. Likewise, in action plans that have specifically tackled gangs such as TGAP or the Youth Crime Action Plan, they fail to give due consideration to the impact on females. There are lessons to be learnt from what has been achieved thus far, for example the use of MARACS to intervene in domestic violence cases. Similar models could be put in place to intervene with women and girls at greatest risk of harm as a result of gang association. Therefore in Chapter three where the document outlines challenges of the future violence against women and girls who are gang affected should also be included.

What are the barriers to sustainable delivery and funding for services for victims of violence against women at present?

With regards to women and girls affected by gangs and serious group offending, the main barrier to funding and sustainable delivery of services is the dominating focus on working with male gang members. As the majority of policy and strategy development to date has looked at intervening with offenders and reducing homicide, less attention has been paid to those who are associated with offenders and the use of rape and other forms of sexual violence in gang conflict. Furthermore, given the risks associated with reporting, police data on female victimisation within gangs is extremely limited. Given the impact that police stats has on setting government priorities, a lack of data has reduced any pressure to offer services. Given all of the above those third sector projects who have worked with women and girls have been very limited and lacked sustainable or long term support. Likewise, public services have not prioritised these issues and instead have worked only with male gang members and on occasion with their parents. The main barrier therefore is the lack

of consideration given by policymakers and service providers to the roles that women who are gang associated play and the risks that they face.

What are the barriers to providing a wide range of quality services for victims of violence against women?

In addition to the points made above, a barrier to providing a wide range of services for women affected by gangs and serious group offending, are the risks involved with accessing such services. As the answer to earlier suggests, there is little awareness of the needs or experiences of women in question. As such there is little awareness of how to support these women, taking into account the risks involved with them accessing a lot of support. For a woman escaping from gang associated violence, the number of people involved as potential perpetrators of violence, increases the challenge of managing the risk. Furthermore, the ages of some of the girls involved may mean putting into to practice child protection and safeguarding policies. There is not always a clear idea of who should lead on an intervention, and the leading partner would vary depending on the type of violence and the level of risk; for example, it may be a case that the police need to lead on an intervention, on another occasion it could be social services, or health services, or would be best responded to purely within the third sector with not public service intervention. The minimal amount of practice currently taking place also means that there is little to build or improve upon. Finally, there is a need for clarity on issues such as consent so that there is agreement where an intervention should be made or a service should be offered and others where support is not a priority. At present there is no clarity on such issues amongst service providers or service users, and girls are being left without support.

The limited amount of work currently being conducted to support such women and girls means that the barrier to high quality practice are numerous and often fundamental to work in general rather than specific.

Are there barriers to partnership working to tackle violence against women?

The main barrier to working in partnership to tackle these forms of violence against women and girls is the lack of awareness of what the needs are. The various types of women and girls affected by gang violence, and the different ways in which they can be affected, means that sectors and services involved will change depending on differing need. In order for partnerships to be facilitated the first step is for all potential partners to be aware of the issues and to acknowledge roles that they could play in service provision. Until all potential partners acknowledge their roles and who is best placed to lead on interventions it is hard for partnerships to be formed.

Further barriers to partnership working are:

- Maintaining independence of third sector provision, such as rape crisis centres, from other statutory provision. This independence is very important for service users to sustain trust in service providers that they do not always have with public services.
- Maintaining funds for specialist third sector providers to keep them functioning, rather than partnership funding reducing the overall income of an organisation.
- Offering secure risk assessment for service users across a number of services that they access across the partnership is crucial.

How best can providers of local services reflect in their local priorities the needs of

women and girls who are victims of gender-based violence?

For local areas who have identified serious youth violence, gang violence or serious group offending as a local priority, they have a starting point to prioritise the needs to women and girls who will be affected by it. It is crucial that serious youth violence interventions are not seen as issues which only affect young boys or only affect those who directly offend. Rather, it should be seen as an issue for all young people and for everyone who is associated with young people, which would include girls and women. Furthermore, the violence that they can experience as a result of this association can be linked to other priorities for public services such as teenage pregnancy, mental health services, criminal justice priorities, including reducing youth homicide. It is important for local services to acknowledge the roles of women and girls, and the importance of working with them, to reduce the variety of issues linked to serious group offending. They need to see the wider picture of gang violence, rather than just prioritise work with offenders directly.

What can be done to place the provision and delivery of services for victims of violence against women on a more sustainable basis?

Funding that runs for three-five years is necessary for any project to develop means of becoming sustainable. Sustainable funding is necessary if it is to secure positive outcomes for the women who access those services. In order for funding to be spent appropriately short term projects need to be minimised, to avoid repeatedly funding one year projects whose impact cannot be maximised. Short term funding may be beneficial for pilot projects, but it would be more beneficial to fund them initially for a short period of time and if there is uptake on them and service users report benefits then this funding should be extended.

Services can also be made sustainable if public services work in partnership with third sector groups to maximise value for money. If such partnerships are formed it should not be at the expense of the third sector. Specialist expertise and delivery from the third sector can save public sector services money by targeting delivery appropriately where necessary.

What can be done to ensure that local bodies work together to ensure the provision of all forms of services for victims of violence against women in your local area?

In respect of women and girls who are affected by gangs and serious group offending we can begin to ensure work across agencies to provide a range of services if:

- those risks are acknowledged in policy
- manageable means of measuring performance are offered to local bodies in order that this be an attractive priority to focus upon
- gender impact assessments of gang and serious youth violence policies are appropriately conducted at a national and local level. If they do not pass such assessment the likelihood is that they could be increasing risk, and therefore the potential for victimisation, to women and girls.

In accordance with the forthcoming Single Equality Bill, the duties to measure the impact of policy and practice on grounds of gender and race will be strengthened and provide a legal incentive for youth violence strategies to give due consideration to female victimisation.

How can we improve women's confidence that the criminal justice system is working to protect them?

For women and girls affected by gangs and serious group offending, there is current little confidence that the criminal justice system is working to protect them. Interim findings of FVV suggest that over 95% of respondents would not go to the police if they were raped in connection to their gang association. For women who are sisters, mothers, partners and friends of gang members there is a concern that:

- the police would be more concerned with gaining intelligence on the gang with whom they are associated rather than investigate their assault
- they do not have legitimate access to the criminal justice system as they are associated with offending behaviour
- they will not be protected if they disclose an assault and will therefore be targeted by both the gang who attacked them, as well as the gang with which they are associated (the latter as they have provided intelligence on them to the police)

These concerns are also having an impact on the way that some young women view *all* services both in the public and third sector. It is important that they are addressed not only to build confidence in the criminal justice system, but also to encourage women and girls to seek support via other means.

The above concerns are also compounded in BAME communities by the disproportionately negative effect that the criminal justice system currently has on them. ROTA continues to work on the disproportionate representation of BAME individuals in the criminal justice system. Most recently our report produced in partnership with Clinks, 'Race for Justice' outlined the continued institutional racism within the system. This discrimination combined with the concerns for women outlined in the Corston report, and the specific issues raised by FVV means that fundamental changes are needed in the criminal justice system in order that it work to protect the women in question.

Finally, as current policy to tackle gangs and serious youth violence is led by the Home Office and in essence criminal justice driven, it neglects the impact of serious group offending on women and girls. Policies and strategies such as the Tackling Gangs Action Programme, Operation Blunt and the Youth Crime Action Plan fail to consider the impact of gangs on women and girls. This lack of due consideration in action points or recommendations has the potential to increase risk to females. ROTA's Building Bridges project interviewed young women who felt at increased risk of sexual assault during Operation Blunt. They stated that as you couldn't stop and search for rape it was seen as a safer option than knives or other weapons. Even though a number of policies acknowledge women they do not follow up this up with any recommendations and therein lies the gap. If there are no policies in place that truly acknowledge the roles played and risks faced by women and girls associated with gang violence, there will be no confidence that any system or service is working to protect them.

Following the completion of the consultation period, the Government will issue a strategy in order to ensure that coordinated activity is undertaken across government to reduce and prevent violence against women:

How should the strategy be delivered? Who should lead it locally?

Aspects of the strategy in place to support women and girls affected by gangs and serious group offending need to be delivered in a strong partnership between the third sector and public sector providers. The government should also strive to get private sector support of the work where possible given that a lot of the preventative work will be linked to representations of women in the media. The recommendations should work both to prevent continued victimisation of women and girls and offer a response where necessary, Preventative measure would need to engage with educational providers, health services, youth services etc. Other aspects of the strategy would be the responsibility of service providers who deal with responding to violence such as the police and NOMS in general, rape crisis centres, women's refuges etc. Delivery at a local level should happen in a co-ordinated way across all partnership services and with effective risk management focused on the risks to the women in question rather than intelligence mapping on the gangs they are associated with.

The lead partner would be determined at the local level once all partners had been identified as it will be dependent on the needs of the women in the local community and work that needs to be prioritised. Need should be identified in partnership with the third sector, using grass roots intelligence to see what work needs to be done, as official statistics will not paint an accurate picture at the local level.

How should progress on the strategy be measured and assessed? Who should do this?

Progress should be measured in consultation with service users on the impact that intervention have had on their lives. The specifics of measurements will depend on what needs has been identified. There cannot be a one-size-fits-all approach to measuring impact. Once the need has been identified by the partnership then these should be worked towards in consultation with service users. Support to monitor third sector partners is crucial, so as not to isolate grass roots who are essential to delivery.

Should the strategy include any specific measures on equality and diversity? What further equalities issues should the violence against women strategy take into account (for example on race, age, gender, ethnicity, sexuality, disability, socioeconomic background or geographical location)?

It is vital that the strategy include consideration of equality and diversity measures of the women it is aimed at. Given the disproportionate impact of the criminal justice system on BAME individuals it is important that any strategy to deal with violence against BAME women is also monitored. The impact of the community cohesion agenda on specialist service provision increases the importance on monitoring for the equalities strands when assessing need. It is the position of ROTA that specialist services for BAME women are essential for supporting BAME women at a local level, and for representing their views at a policy level. Generic services do have the capacity to meet all of their needs, and very often it is the service users preference to seek specialist support. ROTA's consultation of the BAME third sector identified that when this support was removed many BAME individuals were left without support rather than seek generic services.

ROTA would also like to work with the Advisory Group working on PSHE and SEAL education. Work conducted within schools and other educational bodies on healthy relationships is crucial for developing the preventative arm of the work outlined in the above response.

In November 2009 ROTA will be presenting the evidence of FVV to a cross-government roundtable. Having identified research taking place into girls affected by gangs in other UK

cities, including Birmingham, ROTA will present a national picture of how gangs affect women and girls. This roundtable will follow from a London-wide event in October and 5 local events in September. Following these roundtables ROTA will develop multi agency responses to the issues raised at a national, regional (London) and local (borough) level, in both policy and practice. ROTA would like to extend the invitation to the VAW team to attend the national roundtable. We are working with the Government Equalities Office to arrange this event and will contact you in due course with further details.

For further information on this response please contact Carlene Firmin at carlene@rota.org.uk

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