



Consultation Response
July 2009

Race on the Agenda

Response to the Greater London Authority's 'The Way Forward: A Call for Action to End Violence Against Women'

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 Project (2008-2010) (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 as well as ROTA's in-house expertise on Race Equality, Criminal Justice, the BAME third sector, and wider social policy areas such as health, housing and education.

Attached to this email submission:

- Building Bridges Final Report
- Building Bridges Post Conference Report
- Female Voice in Violence Project Brief

This response has been broken down into three main sections:

- General Comments
- Responses to specific action areas and evidence used
- Recommendations

General Comments

1. **ROTA** welcomes this strategy to address the violence experienced by women and girls in London.
2. We also welcome that this strategy considers the impact of violence on girls, as well as women, and begins to make specific recommendations to support girls who are under 16 and experiencing violence.
3. Given the gaps that **ROTA** identified in the Time for Action plan, regarding the links between serious youth violence and sexual violence, we welcome the specific attention paid to the role that rape and sexual violence play in gang conflict.
4. It is important that the document also acknowledges the important role played by specialist third sector organisations that offer support to, and have expertise of, BAME women in London who experience violence.
5. We welcome the recognition of the role of the third sector in providing services to women who will not seek statutory support when they experience violence.
6. An emphasis on prevention is also welcomed provided that the criminal justice system is also engaged in the appropriate way. It is not so much that there has been an over-focus on criminal justice responses, but that even the responses in some cases have had a limited scope. Therefore, addressing violence experienced by girls who are gang associated simply hasn't been addressed by criminal justice or any other agencies in a consistent fashion. In such instances work is required in response, as well as with prevention, in order to achieve maximum outcomes.
7. Where prevention is discussed in the document it is quite limited and fails to acknowledge a number of third sector organisations who are working directly with girls at risk of violence; a more thorough assessment of existing provision is crucial if we are to encourage grass roots services.
8. **ROTA** is concerned at the limited attention paid to sexual exploitation of girls as a form of violence, especially in the sections of the document which summarise all forms of violence against women.
9. There needs to be a greater focus on, and understanding of, the needs of BAME women and the ways in which violence impacts on their lives. The limited access that they have to support, as both girls and women, is a contributory factor to the fact that they are disproportionately represented in the criminal justice system and mental health services. The discrimination that they also experience in employment reduces their ability to live independently and avoid violent relationships. The current strategy fails to address these wider issues and therefore the variety of services and agencies that need to be engaged to support BAME women affected by violence.
10. The strategy lacks guidance on how a number of its proposals will actually be implemented. In order for it to be viewed and used as more than just rhetoric it requires a greater deal of clarity on exactly how the proposed changes will take place.
11. **ROTA** would be willing to sit on the proposed steering group in the strategy, and advocates for a strong BAME representation on the group.

Response to Objective 1: London taking the global lead to end violence against women

1. ROTA agrees that the violence against women agenda needs to be extended beyond criminal justice responses to domestic violence, to consider different forms of violence, as well as, different options for responses and preventative approaches.
2. Looking at the root causes of violence by addressing underlying inequalities, historical inaction and stereotypes and attitudes is also crucial for any strategy to have sustainable impact.
3. Adopting the UN definition of violence against women is important, but we must prioritise a more specific focus on what this means for London, as its issues and needs are complex and unique to the capital.
4. **ROTA** welcomes strategic leadership from the Mayor's office given that it is informed in partnership with third sector organisations, practitioners and with an understanding of how this influences the work that is conducted at a local level. Without this cohesion and holistic working across agencies and sectors the strategy will not reflect the issues on the ground or address them.
5. The recommendation of a steering group and attempts at coordination at a local level is an example of progressive steps which this strategy takes. However in order to ensure that the group is inclusive and aware of the issues on the ground, we would recommend thematic sub-groups sit under the steering group. These sub-groups would be more connected with grass-roots activity and be able to focus on specific types of violence. Where there are already structures in place, such as DV fora that already exist, it is important to not reinvent the wheel. However, there are specific types of violence such as that which is gang associated, and peer-to-peer exploitation (under 16), which are yet to have a pan-London group focused on it. These would need to be created in order that all forms of violence are given equal consideration by the steering group.
6. It is important that this strategy acknowledges the links between violence against women and health inequalities, youth crime and poverty. However, the strategy needs to go further than a simple acknowledgment in order to achieve buy in from the necessary partner agencies.
7. In addition to the above, a number of the consequences outlined in this section fall disproportionately on BAME women, and women from other equalities groups. The impact that violence has, for example, on women's mental health has been well documented and the strategy needs to address this, as well as dedicate further research to the experiences of BAME women who suffer violence.
8. While the document recognises limited knowledge of forms of VAW such as FGM and forced marriage, it needs to commit to working alongside those specialist organisations that work in these fields, and build expertise from the grass roots up.

The sub-group structure recommended in 1.5 is one way of achieving this; as well as continuing to support and this work to ensure that it isn't lost during budget cuts.

9. **ROTA's** FVV Project has identified the negative attitudes discussed in this strategy, which often blame women for the violence that they experience. We would go further to say that we have seen girls from a variety of backgrounds have the same attitude as one another, and as such that this is a problem for British culture and needs to be addressed as one. Linked to this these attitudes is the portrayal of women in modern culture, from music to politics, where their physical appearance is often prioritised above all else, and where moral judgements are made of them which not put upon their male counterparts. In order to begin to address this, we have to see such attitudes as deep rooted and not attribute them stereotypically to certain groups.
10. Universal work is required for all young people is VAW work is to be truly preventative, and should be conducted in places wider than schools, as a number of young people will be in other educational establishments while also attending different youth groups etc.
11. A significant amount of FVV's interim findings examine the attitudes of young people to coercive sex and opinions regarding consent. While it is placed within the context of gang association, a number of girls interviewed do not have gang association, and yet very often there is no difference between their responses and those given by girls who are gang associated. While the strategy states that rape and sexual assault are relatively common by gangs, there are no statistics offered to substantiate this claim. While the findings of FVV would suggest the same thing, ROTA would call for the GLA to conduct their own scoping exercise on the extent to which this is the case, and contact service delivery organisations in the statutory and third sector to build statistics. Working with the MPS will not offer an example of prevalence given the negligible levels of reporting, especially with this type of rape and sexual assault.

Working from the findings of FVV and the pan-London roundtable at which we will be building a strategic response and recommendations, the GLA should be able to take this exercise forward. The summit which the strategy recommends will be one way of taking the roundtable findings forward, and informing wider stakeholders of a strategy for London. This will also provide a context within which Time for Action and the Way Forward can be co-ordinated to bring this aspect of youth violence/violence against women and girls together in both policy and practice.

12. Mentoring schemes, as suggested in the strategy, are one way of addressing the needs of young women and girls. However, such programmes need to be implemented within a wider strategy of services of girls, given that the focus for support has been targeted and boys for so long. A substantial piece of work will be to assess current 'young people's' projects to see how many of them meet the needs of both boys and girls, compared to those that ultimately only attract boys. Likewise, strategies which aim to improve the life chances and/or experiences of young people need to be assessed to establish whether they address the needs of *all* young people or whether their focus is on boys to the detriment of young women and girls.

Response to Objective 2: Improving Access to Support

1. At the beginning of 2009 **ROTA** consulted with London's BAME third sector, to establish their social policy priorities and inform the direction of our work. Across all the social policy areas highlighted¹, access to appropriate services was a key concern. For BAME communities, accessing appropriate services is a consistent barrier to them fully participating in society, increasing their exclusion and potential for victimisation. For BAME women who experience violence, inability to access services can be both a contributory cause of their initial victimisation as well as a reason why they continue to experience violence without support. Being able to access support from generic services such as sexual and mental health services, housing and education services is crucial as both preventative and responsive support for BAME women, as well as the role played by specialist third sector organisations that support them.

The role of specialist services in bridging the gap between marginalised communities and generic services should not be underestimated. They are crucial in both ensuring that individuals are supported, but also in increasing inclusivity. Identifying sustainable funding for these services is imperative if BAME women are to continue to be supported in the way that they should be.

2. SARC's and rape crisis centres respectively play important roles in supporting women who have experienced sexual violence and rape. However, in order that they can provide support to girls and women who are assaulted due to gang association the following must be addressed:

- FVV respondents have been unsure of the level of independence that Haven and Rape Crisis Centres have from statutory agencies. Girls, especially those in the secure estate, do not believe in confidentiality and are of the opinion that as their experience is gang related then it will be reported to the police regardless of their wishes. SARC's and Rape Crisis centres must be supported in illustrating to potential service users that they are independent of the agencies who may fund them, in order to meet the needs of a number of girls who otherwise would not access any support at all.

- The fact that service provision in this area is so limited and non-existent in most boroughs also reduces the ability of girls, who are gang affected, to access them. Many girls who are gang associated are unable to leave their borough, and very often their own postcode or ward for fear of attack. If there is no provision in their locality it is unlikely that they will know about it, or be able to access it. If the only provision is in an area where there is a rival gang then there is no way that they can access this support. This means that for the majority of girls who are gang affected, the location of such support services means that they are unable to access them.

¹ Community Cohesion, Health, Education, Poverty and Social Exclusion

- If Rape Crisis and Haven centres will ultimately be tasked with supporting gang associated young women, as well as other specialist support services for girls, they must all be capacity built to deal with the increased risks and need for resources that such a service brings. A girl who has been targeted by a rival gang of her boyfriend's will be at risk of both from the gang who raped her, as well as the gang to whom she is associated as both will have an interest in her not reporting what has happened to her. Supporting an individual who has that number of people actively not wanting her to speak out increases risks to her as well as staff who are supporting her. Developing organisations through training and increased resources is essential to do this type of work. By working in partnership with the women's resource centre, ROTA hopes to use the findings of FVV to increase the awareness of the women's sector, especially BAME women's groups, to this form of violence. Furthermore, we aim to encourage women's, gang's and young people's projects to work together to develop specialised support for gang affected young women. We will begin this via a third sector roundtable to discuss our interim findings in November.

All of the above must be considered when the Mayor uses the allocated funding from his budget to increase rape and sexual abuse support services as outlined in the strategy.

3. **ROTA** welcomes specific attention paid to the needs of children and young people who experience violence, especially young girls. However, while the initial list of violent experiences include sexual assault, violence within personal relationships and sexual exploitation, the key facts focus purely on domestic violence and violence that young people witness. This reduces the impact that this strategy currently has for young girls. To date girls and young women have been left out in policy development, neglected by both youth violence policy (aimed at boys) and violence against women policy (aimed at over 16's, apart from child abuse). This pattern has allowed young girls who experience violence at the hands of their peers with little consideration in policy and strategy. While this programme has the potential to change this, it currently fails to realise this. As well as LA's, health and criminal justice services outlined in the strategy, schools and educational providers needs to be considered as support services for these girls.
4. Training for statutory service providers is crucial. However, in under-researched areas of violence against women such as FGM and gang violence, the voluntary sector must be supported to develop specialist training, as they are the ones with direct experience of service users. Training in under-researched areas of VAW must also be delivered to generic women's organisations, and other third sector partners who work with women and girls, such as youth projects, if all women and girls are to be protected. An investment needs to be made in developing this training from the grass roots, with an acknowledgement of specialist need in some of London's communities, and the variety of violence that women and girls experience.
5. **ROTA** welcomes the explicit consideration given to the needs of diverse communities in London. However, besides from cultural and other sensitivities, it is important to note the current threat to specialist services in the third sector. The

Mayor needs to publicly commit to the role of specialist services and support the EHRC in the monitoring of Local Authorities who fail to provide adequate services to protect women and girls. Very often the reason for disproportionate experience of VAW in BAME communities is due to the lack of support individuals receive prior to violence occurring, for example health, housing or education, as well as the barriers to accessing support once violence is being experienced. In order to tackle VAW with both a preventative and responsive arm we need to ensure that services are provided to BAME women, and other marginalised groups throughout their lives, not only when they are in distress.

Response to Objective 3: Addressing the health, social and economic consequences of violence

1. Given the clear links between VAW and wider social policy issues and services, such as health, housing and education **ROTA** is pleased to see an action point for the London Health Commission to convene a roundtable. It is crucial that such a roundtable has engagement with the third and statutory sectors, and that there is representation for the various forms of VAW as well as the various equalities strands whose services users face exacerbated isolation when experiencing VAW.
2. While the role outlined for health is welcomed, much of the areas of care are more targeted at women, rather than girls, who experience violence. A number of girls struggle to receive mental health services from CAMHS; given that many young people gain access to CAMHS via a YOT, boys will be more likely to receive this support than girls. Sexual health services need to be more attuned to the potential violent experiences of young women and girls and the NHS and PCT's need to provide appropriate mental health support to girls to both prevent, as well as respond to, their experiences of violence.
3. It is significant that the strategy begins to consider the importance of housing and employment policies in both preventing and responding to violence against women. A Pan-London multi-agency group may be an important sub-group to have from the steering group already recommended in this strategy. Such a sub-group could look at the issues being raised from a multi-agency level altogether and see whether there are ways that they could support one another and work in partnership. In the few boroughs that have a multi-agency roundtable to discuss the experience of girls and gangs, the groups have facilitated better partnership working and therefore service provision for the girls in question. A pan-London group which supported such a structure for all violence against women, may encourage Local Authorities to hold their own to meet the needs of local service users experiencing violence.
4. Given the research conducted by numerous organisations on the impact on VAW on the most marginalised groups, it is no coincidence that BAME women are disproportionately represented in the criminal justice system and in mental health services given the potential for them to experience repeated victimisation without support. **ROTA** supports the recommendation from Corston referenced in the strategy for a 'women-centred approach' to address female offending.
5. When supporting children who have witnessed violence it is important that this strategy considers more than children who have witnessed domestic violence. Given the current scale of peer-to-peer violence and teenage homicide, we must not forget those children who have witnessed extreme violence and assault within their peer groups, or who have known somebody who has been murdered. For children growing up in areas of high serious youth violence, support is needed to prevent murder and serious assault becoming normalised. Such experiences will create long term problems, and may manifest themselves in other violent displays as these children enter adulthood.

Response to Objective 4: Protecting women at risk

1. While the criminal justice system has made progress in responding to some forms of VAW, especially domestic violence, little to no progress has been made with other forms of VAW, such as the use of rape in gang conflict.

During the fieldwork for both Building Bridges and FVV respondents have stated that, during periods of Operation Blunt, they felt at increased risk of rape if they were gang associated. The logic behind this being that, it wasn't possible to stop and search for rape, and therefore it was seen as a safer weapon of choice during these periods. Another example is the lack of intelligence held by various CJS, especially the MPS, on girlfriends and other female associates of known gangs. When an arrest is made a number of female associated with the gang member who has been arrested will be placed at immediate risk of assault, especially as he may have been their own form of protection prior to this. While some agencies will stick to a debate about whether she is entitled to protection given her criminal association, we must not forget that a number of these girls will be children and furthermore, that some will be siblings and mothers whose association is not one of 'choice', constrained of otherwise.

By failing to consider serious youth violence as an issue for women and girls, and therefore a 'violence against women' concern, the CJS, and partners, have failed to offer such females any protection, and have potentially increased the risk that they face. **ROTA** hopes that once necessary partners at a local, pan-London and national level have engaged with FVV via multi-agency roundtables during the year, they will begin to re-think policy and strategy around serious youth violence, and consider the impact of these strategies on women and girls. As such we welcome the recommendation of a review of policies, and such a review must extend beyond explicit policies on VAW, to wider policies on serious youth violence and service provision.

2. While this section of the strategy recognises the use of sexual offences by those involved in serious youth violence, it doesn't place these experiences within the current policy framework, or explore the wider issues relating to women and girl's involvement in serious youth violence. In order to achieve this we welcome the recommendation that all criminal justice agencies receive training in wider forms of violence against women; we would extend this to also include policymakers and those devising strategies to support women and girls affected by gang related, and other forms of, violence.
3. Working locally, but also across boroughs, is crucial to protect and support women. In order for local provision to be successful, it must be coordinated across all local agencies, services and sectors. It would be useful for the GLA to identify models of good practice as an incentive for other boroughs to follow suit. The same applies to support being offered to marginalised groups; it is essential that the boroughs who are offering such support and working with the third sector to achieve this need to be identified and supported as models of good practice.

Response to Objective 5: Getting tough with perpetrators

1. Joint engagement meetings are welcomed as way to facilitate multi-agency working on the ground. Once again we would recommend finding models of good practice to clearly demonstrate how to implement this recommendation and incentivise boroughs to do so.
2. Given the extensive research that **ROTA** has undertaken, and the advice that we have offered GLA staff over the past two years, we welcome the inclusion of action points regarding the use of rape within gangs, and that evidence has been used from our Building Bridges project. This is the first violence against women strategy (regional or national) that has included such actions, and therefore signals a break in the trend of neglecting this issue in VAW policy. Furthermore, the recommendation that it be included in the MPS youth gang strategy as a 'top priority' creates the potential to shift the method by which all agencies address gang violence, and include the risk to girls in their strategies.
3. There are some further considerations that need to be made regarding recommendations in 5.3:
 - The statistic used of 176 reported gang rapes reported to the police is not a useful one for a number of reasons. Firstly, given the extremely low level of reporting that exists for this type of offence, it will not reflect the grass roots reality. However, more importantly, this statistics represents rapes which included three or more perpetrators, not rapes that were necessarily gang associated. It is crucial that these different types of assaults are not conflated. Women who associate with gangs are at risk of rape; this rape may be perpetrated by one or more attackers, it is not necessarily carried out by a group. It is a gang-related rape. Rapes with three or more attackers may be gang associated or may be conducted by a peer group etc and will not be 'gang' associated. Any intervention that is put in place must acknowledge this distinction as they require completely different responses.
 - While it is useful to acknowledge that Operation Blunt cannot be used as a tool to address the use of sexual violence in gangs, this strategy fails to acknowledge that by focusing responses on a particular weapon, such as a knife, girls can be placed at *increased* risk of sexual assault as it becomes a 'safer' weapon of choice. During Blunt periods in 2008 girls reported to us that they felt at more risk of sexual assault, if they were gang associated, than they did when Blunt was not in operation. They claimed that boys saw it as a safer weapon as it couldn't be stopped and searched for and therefore rather than stab a rival they may rape their sister or girlfriend. The strategy needs to address how to stem this trend.
 - While the police do have a role in protecting women and girls from sexual violence, a sexual assault which is gang related will very rarely come to their attention. This strategy needs to think more broadly about which types of services and agencies, especially health, housing and education, can also support such women.

Girls who are associated with gangs, either as sisters, girlfriends, mothers, friends or as members do not feel like the criminal justice system is there to protect them. They will argue that if they were to report a rape or assault to the police they would

be under pressure to offer intelligence on the gang to whom they are associated. Given this potential to offer intelligence they will be under pressure from both their attackers and their peers not to come forward. Third sector interventions are more appropriate in the first instance, and their awareness and capacity to support and protect these women should be a priority.

- The above recommendation focuses mainly on girls who may be raped as reprisal or as a threat. There is also evidence of girls being passed around the gang to whom they are directly associated, and exploited by them. When this strategy makes reference to the fact that 'some girls don't perceive their experience as rape' it is referring to this type of attack and not the one discussed in the above section. The difficulty with this strategy as it stands is that it lumps a number of different types of assault together and then makes recommendations to respond to them all as a collective; this will never work. The strategy needs to be clear about what types of violence exist for women and girls who are gang associated, and make clear recommendations for each of them; at present it does not achieve this.
- With regards to being sexually exploited within gangs, the strategy is correct in that more work needs to be done on raising awareness of sexual violence and being clear about consent. However, it appears to have missed the fact it is not that boys ignore consent – they know that if a girl is screaming 'no' that they cannot have sex with her – it is that a number of boys and girls are not clear on what consent is. Every girl who FVV have consulted with will say that rape is wrong. However, they will also state that there are certain situations that girls can place themselves in, or that there are certain types of girls, which excuse certain sexual behaviour. There is a lack of clarity about what the reasons may be for having sex in the first place, and very often they will state that a boy's main reasons for having sex are completely different to those of girls. It is around these issues that education needs to be developed, and that agencies have to be trained in order to deliver appropriate messages to young people.
- While it may be possible to focus on areas where gangs seem to be posing a significant threat, the fact that young people cross boroughs presents a problem for relying on a response as targeted as the strategy suggests. Furthermore, for boys and men who are involved in the most serious criminal gangs, girls who are already gang involved or live in gang affected neighbourhoods have the potential to draw attention to themselves from the authorities. Therefore, they may seek out girls from better schools, in safer boroughs, who will not be known to social services etc and who will not increase risks for them. This girl may also have her own bank account etc and will create a smokescreen for his activities, as well as a break from the dangers that he faces when at home. These girls are at serious risk of rape from rival gangs, and will not be protected in a response which targets the most gang affected neighbourhoods.
- The strategy also fails to acknowledge that some girls will also actively recruit girls to be exploited and set others up to be raped, often to avoid their own victimisation. Any response that wants to work with perpetrators has to have in place a strategy for working with girls as well as boys.
- **ROTA** aims to support the GLA, and other stakeholders, in addressing these gaps at a pan-London roundtable to be held in October. Once this initial exercise has

been conducted, and a strategic response has been developed, we will be looking to the GLA to lead the way in implementing the strategy at a local level, and working with national and central government departments to create an appropriate policy framework for action.

4. The fact that this strategy makes reference to the use of safeguarding procedures is important, as **ROTA** and others have advocated that when young people experience violence it should be viewed first, and foremost, as a safeguarding issue. However, it is disappointing that the strategy only makes reference to it when the perpetrator is an adult. We would recommend that the GLA look at how safeguarding can be used to address girls experience of violence inflicted by their peers, and how safeguarding measures can be put in place to respond to the perpetrator and victim, when both are under 16.

Recommendations

Given the above comments, **ROTA** would broadly recommend the following that:

1. The needs of BAME women who experience *all* forms of violence (and not just those forms associated with minority groups in the strategy) are properly understood, and given this, that third sector specialist provision is sustained to support them, and other marginalised groups.
2. That the expertise of specialist services is respected, and that they are engaged with, to ensure that the strategy accommodates for emerging needs and risks.
3. The VAW steering group be representative of all agencies (such as health, housing and education), have strong links to local authorities and include membership from third sector organisations. Furthermore, that this representation takes into account the work of smaller third sector and community groups, and accounts for all forms of violence against women and girls, and all equalities groups.
4. In order to achieve the above, that where a model doesn't already exist in some form, themed sub-groups sit under the steering group which focus on particular forms of violence. The chairs of these sub-groups would sit on the steering group bridging the two. These sub-groups will also consider the impact of VAW on all equalities groups.
5. Rape and sexual support services are sustained, increased and capacity-built to support women who experience all forms of sexual assault, and work in partnership with specialist organisations who work with the most marginalised groups, such as BAME women, or girls who are gang associated.
6. The gap in policy which allows girls who are under 16 and are experiencing violence to be unaccounted for is closed. At present serious youth violence policy does not consider women, and VAW policy fails to support under 16's who directly experience violence; this leaves them without dedicated, specialist support. Furthermore, it means that statutory agencies are often unaware of their experiences, and that local authorities do not see it as a priority. This needs to change via detailed policy recommendations, training provision and funding for services.
7. The strategy provides greater clarity on the role of services that sit outside of the criminal justice system, and creates pressure and guidance for them to support women and girls who experience violence.
8. Women and girls who experience violence due to gang association are considered in greater detail, and that the various forms of victimisation that they experience are not conflated and responded to with a singular recommendation.
9. That those girls who directly experience, and not just witness, violence are understood and their needs addressed by this strategy as a safeguarding, as well as criminal justice, issue.

10. The GLA work with **ROTA**'s FVV project to develop an appropriate multi-agency strategy to supporting women and girls who experience gang related violence; and furthermore, that they ensure that wider partners from health, housing, education, criminal justice and employment are engaged, ensuring that this is taken forward and implemented at a local level.

For any questions regarding this consultation response please contact Carlene Firmin on 020 7902 1134 or carlene@rota.org.uk

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