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Welsh Women's Aid Consultation Response: Domestic Violence Disclosure Scheme Draft Statutory Guidance

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These are the views of:	Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.

About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse, and sexual violence (VAWDASV) specialist services in Wales (comprising our membership of specialist services and members of the regional VAWDASV Specialist Services Providers Forums). These services deliver lifesaving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence, and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support, and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors.

We also deliver the Wales National Quality Service Standards (NQSS), a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found here: www.welshwomensaid.org.uk/what-we-do/our-members/national-quality-service-standards-ngss/).

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Introduction

Welsh Women's Aid (WWA) welcomes the opportunity to respond to this consultation on the draft statutory guidance for the Domestic Violence Disclosure Scheme (DVDS). The disparities that exist in how different police forces across England and Wales operate the DVDS is well-known within the VAWDASV sector¹. Efforts to drive up the effectiveness and standardise the implementation of the scheme, including to reduce the timescales for disclosures, are long overdue, in order to ensure any woman, wherever she lives, is provided with prompt and detailed information about perpetrators who put her and her children at risk. WWA therefore warmly welcomes the DVDS being placed on a statutory footing and with it the duty imposed on the Home Secretary to issue guidance to police forces, from which they will require significant justification to deviate. WWA is also pleased to see recommended timescales for disclosures under the DVDS reduced to 28 days down from 35 days, with the hope that survivors will receive critical information about their safety more promptly. In its current form however, the updated guidance continues to allow police forces enormous discretion around how to operate the scheme. Without providing police forces with detailed best practice guidance as to what level and types of information should, routinely, be disclosed and in what format for example, the DVDS will remain a postcode lottery. The guidance moreover requires substantial further development to ensure a multiagency approach is consistently taken by forces, to ensure accessibility for marginalised groups of survivors, to promote flagging procedures which foster a proactive culture to disclosure and to ensure vital opportunities to safeguard children are not missed. A litany of questions persists moreover as to how police forces will be resourced to deliver the scheme effectively, how officers managing disclosures will be trained, how performance will be monitored and reported on and how the efficacy of the DVDS in preventing serious harm and homicide as a whole will be evaluated.

The following is a summary of points raised by WWA's specialist domestic abuse and sexual violence member services and by survivors within WWA's Survivors Network. The response below provides detailed feedback on the draft guidance as published. The unescapable vital point must first be made however that transformative structural and cultural change must be achieved across police forces, courts, and the CPS to drastically

¹ For example, <https://www.thebureauinvestigates.com/stories/2018-01-09/huge-disparity-in-how-police-use-law-to-protect-women-from-violent-partners>

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improve survivors' confidence in reporting and the seriousness with which the criminal justice system treats allegations of abuse, particularly harassment following separation. Until then, it should be stressed, the preventive potential of the DVDS will forever be curbed as so many dangerous perpetrators will continue to avoid detection.

Ensuring Police Forces Consistently Take Multi-Agency Approaches to Decision Making and Disclosure under the DVDS

A key concern born out of the consultations we undertook with specialist VAWDASV services on the guidance was the inconsistency with which they were involved by police forces in DVDS decision making and disclosures. A number of member services reported regularly being involved along with other partner agencies in threshold discussions for DVDS disclosures and praised the effectiveness of this. Others however reported that this was ad hoc, if at all, and raised concerns around the valuable information sharing opportunities to inform decision making being missed as a result. Some members reported that discussions with partner agencies about DVDS referrals was largely accomplished via discussions at the end of Multi-agency Risk Assessment Conferences (MARAC). Some concerns were expressed that this led to very long meetings from which key agencies had to leave early and questions of how referrals for survivors at medium risk were being managed. Additional concerns were expressed that partner agencies involvement in DVDS decision-making had declined where MARACs in some areas had moved away from daily discussions to fortnightly or monthly meetings. Only a few member services reported having been invited to attend disclosures to survivors.

Disappointingly whilst the guidance "encourages" forces in all cases to work with relevant partners via multi-agency forums it also states, "where cases do not meet the high-risk threshold this can be done on a case-by-case basis". The urgency and seriousness with which the guidance instructs forces to deal with high-risk cases must be praised. However, given that we know without intervention medium risk cases often become high risk and that a key issue identified in domestic homicide reviews is risk not being assessed as high enough or risk being downgraded², to harness the preventative potential of the DVDS all cases warrant multi-agency involvement and information sharing. How the guidance is currently written moreover implies that forces only

² <https://www.gov.uk/government/publications/key-findings-from-analysis-of-domestic-homicide-reviews/key-findings-from-analysis-of-domestic-homicide-reviews>





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need liaise with key partners and local multiagency forums “where appropriate” as part of the full risk assessment, the initial decision to progress applications for disclosures having already been taken based on police intelligence checks. Whilst the guidance then states it is “good practice” to take a joint-agency approach to disclosures this again is left up to forces to “consider”. Many of the survivors we consulted felt those receiving disclosures would greatly benefit from having the option to have a local specialist domestic abuse worker present to provide information about their rights and options as well as referrals to services.

WWA recommends the following amendments be made to the guidance to ensure police forces consistently take multi-agency approaches to decision making and disclosure under the DVDS:

- Police forces should be directed to establish local DVDS multi-agency forums or bodies specifically dedicated to considering both “Right to Ask” and “Right to Know” applications.
- These DVDS multi-agency forums should consider both medium and high-risk referrals and should include representatives from health, children and adult social services, education, and the local specialist domestic abuse service where different from the local IDVA service.
- Police forces should be directed to take a joint-agency approach to disclosures in all cases and develop close working relationship with specialist VAWDSV services to offer all survivors receiving disclosures the option to have a specialist domestic abuse worker present.
- Guidance should direct officers to offer referral to support services where appropriate rather than mere signposting.

Safeguarding Children and Young People: Addressing Missed Opportunities

The devastating harm caused to children of living with domestic abuse is now widely recognised, as is the overlap between domestic abuse and the most severe forms of child abuse which result in the death of a child³. The VAWDASV (Wales) Act 2015⁴ and Domestic Abuse Act 2021⁵ specifically recognise children as

³ <https://learning.nspcc.org.uk/media/1042/child-abuse-neglect-uk-today-research-report.pdf>

⁴ <https://www.legislation.gov.uk/anaw/2015/3/contents/enacted>

⁵ <https://www.legislation.gov.uk/ukpga/2021/17/contents/enacted>

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victims of domestic abuse in their own right, as referred to in passing in Annex A. Children and young people, however, are concerningly otherwise near totally invisible in this guidance.

We know that the complex decisions survivors weigh whether to remain in abusive relationships and/or how to manage the risks posed to them, including by ex-partners, will very often hinge on concerns for the safety and well-being of their children, in addition to their own. Women often cite the impact that seeing, and hearing abuse has had on their children as a deciding factor to leave. As referenced in the guidance the DVDS overlaps with Multi-Agency Public Protection Arrangements (MAPPA) and the Child Sex Offender Disclosure Scheme (Sarah's Law)⁶. However, the statutory guidance for the DVDS must clearly instruct police forces to view and utilise disclosures under both "Right to Ask" and "Right to Know" as vital additional opportunities to safeguard children and young people from those who pose a risk to children owing to domestic abuse.

In 2013 the UK definition of domestic abuse was widened to include young people aged 16 and 17, thus increasing awareness of young people who experience or perpetrate abuse in their own intimate relationships⁷. We know however younger children are also affected⁸. Research suggests that young women who experience abuse are likely to have particular needs due to the increased social acceptance of abuse amongst their peers, an increased risk of strangulation linked to the viewing of violent porn and of digital abuse facilitated by online platforms⁹. Disclosures to be made to those aged 16 and 17 by definition require especially sensitive management and risk assessment accompanied by expert tailored safety planning and support, particularly for example where a "Right to Ask" application has been made by an estranged parent or guardian. Worryingly the guidance in its current form offers no advice to police forces around how to manage these types of disclosures in order to best safeguard young people being abused.

WWA recommends the following amendments be made to the guidance to ensure vital opportunities to safeguard children and young people are not missed:

⁶ <https://www.south-wales.police.uk/rbbvqo/request/ri/request-information/sarahs-law-beta/sarahs-law-child-sex-offender-disclosure-scheme/>

⁷ <https://www.gov.uk/government/news/new-definition-of-domestic-violence>

⁸ Barter, C, McCarry, M, Berridge, D and Evans K (2009) Partner exploitation and violence in teenage intimate relationships, NSPCC [Online] Available at: <https://www.nspcc.org.uk/globalassets/documents/research-reports/partner-exploitation-violence-teenage-intimate-relationships-report.pdf>

⁹ <https://safelives.org.uk/sites/default/files/resources/Safe%20Young%20Lives%20web.pdf>

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- The guidance should clearly state “Right to Ask” and “Right to Know” disclosures can be made to and about individuals aged 16 and 17.
- References made throughout the document to disclosing information to protect victims should be amended to explicitly address how information can safeguard children, for example “to protect the potential victim and any relevant children or young people”
- Offences and allegations listed in Annex B should include abduction of a child by parent under the Child Abduction Act 1984¹⁰
- Section 72. should require any local multi-agency forum, convened to discuss disclosures, include Children Social Services and Education.
- Section 84. should require disclosures include, as standard, information about incidents alleged to have taken place in the presence of a child or alleged to have resulted in harm to a child or young person.
- Best practice guidelines should be included for making disclosures to young people experiencing abuse in their own intimate relationships, developed in partnership with experts.

Decision Made to Disclose Information: Stronger Guidance Required to Ensure Effective and Consistent Disclosures

By far the biggest concern raised by the survivors and specialist VAWDASV member services we consulted on this guidance, was the distinct lack of direction it gives to police forces on the types of information and the level of detail expected to be routinely included in disclosures. Member services reported notable discrepancies among disclosures to survivors both between and within police forces. Whilst some disclosures, services were aware of and had been involved with, had contained chronological and contextual information about offences committed, warnings, allegations and intelligence about other criminal activity which suggested survivors were at risk, other disclosures simply listed convictions solely related to domestic abuse.

We know survivors face a litany of barriers to reporting abuse to the police, including well-founded fears of reprisal from perpetrators and entrenched distrust of the criminal justice system. Consequently, many dangerous perpetrators we know will never face arrest, let alone conviction for domestic abuse related

¹⁰ <https://www.legislation.gov.uk/ukpga/1984/37>





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offences. WWA welcomes the repeated reference in the guidance to basing the decision to disclose not solely on domestic abuse convictions but on other information or intelligence held about a person's past behaviour. This is greatly undermined however by the repeated focus elsewhere in the guidance on charges and convictions without reference to intelligence, alongside the very limited direction given on what types of information disclosures should contain and the legal basis on which to disclose intelligence.

Unless the guidance makes clearer the expectation that forces should routinely disclose significant intelligence which may not directly relate to domestic abuse, but which strongly suggests a perpetrator poses harm to survivors many opportunities to safeguard the most vulnerable will be lost. Forces moreover must be strongly advised to present information about perpetrators in detailed chronological narratives to ensure disclosures are sufficiently impactful by illustrating how perpetrators abusive behaviours are escalating and form part of a sustained pattern.

Without providing police forces with detailed best practice guidance as to what level and types of information should, routinely, be disclosed and in what format, the operation of the DVDS will remain a postcode lottery. WWA recommends the following amendments be made to the guidance regarding what and how to disclose information:

- Strengthen language such that it makes clear forces are expected to share relevant intelligence with survivors— ensure all sections which reference convictions simultaneously reference relevant intelligence.
- Provide police forces with additional guidance around the legal basis for sharing intelligence.
- Introduce an additional Annex listing non-exhaustive examples of relevant intelligence which should be shared. This should include the number of times and the number of partners for which a perpetrator has been heard at MARAC, incidences where children have been subject to formal safeguarding procedures due to domestic abuse related to the perpetrator, intelligence regarding possession and supply of drugs, possession, and use of weapons and the perpetrator being known as a risk to professionals.
- Offences and allegations listed in Annex B should include breach of non-molestation order under Family Law Act 1996, s.42A and breach of restraining orders under Protection from Harassment Act 1997, s.5A.

Informing Perpetrators of Disclosures: Stronger Caution Required

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Women are at the greatest risk of homicide at the point of separation or after leaving abusive relationships. Survivors we know must go to great lengths to conceal their plans to leave abusers precisely because they fear how abuse will escalate if their perpetrator senses a loss of control. For a perpetrator to be told then, that their current or former partner may receive a disclosure under the DVDS about their abusive history, will in all but the most exceptional circumstances, significantly escalate risk to survivors. Without exception all of the survivors consulted on this draft guidance were “horrified” to learn of this possibility and confirmed this drastically reduced their confidence in making a ‘Right to Ask’ application. Though Section 81 of the guidance states decisions to inform perpetrators of disclosures should be based on an assessment of risk to survivors, WWA would strongly recommend that the guidance more robustly caution against informing perpetrators of disclosures in all but the most exceptional circumstances. The guidance should then provide detailed examples of the cases in which doing so might be justified whilst still prioritising the safety of survivors and children.

Managing Applications and Disclosures: Further Points to Consider

- Whilst we welcome that Annex C of the guidance advises forces to allocate each enquiry to DVDS a unique reference, this requirement ought to be stated much more prominently in the main text of the guidance. A number of the survivors we consulted had had their initial enquiries for disclosures repeatedly lost by forces, whilst others reported that officers had seemingly failed to take, record, or progress their enquiries entirely.
- WWA welcomes advice in the guidance that forces should consider their legal obligations to make reasonable adjustments to accommodate the accessibility requirements of all those who enquire about the DVDS. Disappointingly, however, the guidance makes no reference to the specific barriers marginalised groups of survivors will face to engaging in the process and furthermore consigns what efforts ought to be made to ensure accessibility as entirely at the discretion of local forces. WWA strongly recommends that forces be explicitly directed in the guidance to address the particular accessibility needs of survivors who face multiple forms of oppression including due to race, immigration status, disability, sexuality and/or

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multiple disadvantage. The guidance moreover ought to set out a set of safe minimum practice standards to ensuring the schemes accessibility.

- WWA welcomes the advice in the guidance that where identified a stalking risk assessment should be completed alongside the Domestic Abuse, Stalking and Harassment and Honour Based Violence (DASH). WWA recommends this advice be supplemented that where identified additional screening questions for Honour Based Abuse (H-DASH) should be explored.
- Whilst WWA was pleased to see the timescales for disclosures under the DVDS reduced to 28 days down from the current 35, language used in the guidance disappointingly is that police should only “aim” to do so and timescales are only “intended as a “guide”. WWA would recommend this language be considerably strengthened to ensure consistent practice across forces. Whilst some of the survivors we consulted had received prompt disclosures others reported waiting many months, particularly where disclosures required collating information from forces in other nations.
- Repeated and extensive advice is given throughout the guidance that those who receive disclosures under the DVDS should be asked to sign undertakings agreeing not to share information further and given warnings of the possible criminal penalties for doing so. Additionally, forces should be advised to make clear how doing so might also undermine not only theirs and their childrens safety but that of other survivors linked to the perpetrator.
- WWA recommends the guidance ought to also contain clear recommendations for flagging and tagging perpetrators under the DVDS in order to prompt proactive disclosures to new partners. Members services consulted reported significant divergence between forces thresholds for flagging perpetrators as warranting automatic “right to know” disclosures to new partners. Providing clear guidance to forces around doing so is crucial if the true preventative potential of “Right to know” is to be realised. Consideration in the guidance should also be given to how forces should understand and utilise the relationship between “right to ask” and “right to know”. For example, forces ought to be advised that where significant additional information about perpetrators risk comes to light, where appropriate those

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who have received “right to ask” disclosures should be contacted to receive further disclosures under “right to know”.

- Many of the survivors we consulted stressed the importance of being provided with detailed rationales when informed they would not receive a disclosure. Member services consulted similarly highlighted the importance of ensuring decisions not to disclose were communicated in a way which avoided giving survivors a false sense of security about the risks posed by their current or former partner. WWA is pleased therefore the guidance includes clear advice to stress the limitations of intelligence, that decisions not to disclose and a lack of information held about individuals does not mean survivors concerns are unfounded.
- Annex J should be reviewed in full to ensure it contains accurate and full details for the services listed.¹¹ Support services for those subject to sexual exploitation should also be added.

Implementation: Questions and Recommendations

- What training will accompany the final guidance and if so, to what extent will training (as a one-off or ongoing structure) be compulsory for all forces? How will training about the DVDS center the voices and lived experiences of survivors? Member services report continuing to come into contact with officers who wrongly believe only female current partners of perpetrators are able to receive a disclosure under the DVDS. Both survivors and member services additionally stressed that officers who manage disclosures must not only have an advanced understanding of survivors’ rights under the scheme, of the complex dynamics of domestic abuse, risk assessment and safety planning but vitally must also understand how to take a trauma-informed approach to making disclosures.

¹¹ Live Fear Free helpline: 24-hour, confidential support and information for anyone experiencing sexual violence, domestic abuse or violence against women in Wales, and for family, friends, colleagues and others calling on their behalf. Phone support available in Welsh, English and any other languages. Freephone T: 0808 8010800 Type Talk: 1800108088010800 24/7 text support: 078600 77 333 Email: info@livefearfreehelpline.wales 24hr live chat: www.livefearfree.gov.wales; Bawso 24hr helpline: Bawso is the lead organisation in Wales providing practical and emotional support to black minority ethnic (BME) and migrant victims of domestic abuse, sexual violence, human trafficking, Female Genital Mutilation and forced marriage. T: 0800 731 8147 <https://bawso.org.uk/en/>





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- How will police forces be resourced to advertise the DVDS, meet the reduced timescales for disclosures and clear expectations for face-to-face meetings under the scheme? Whilst WWA would advocate forces widely advertise the DVDS in their area including to marginalised groups of survivors, work to make timely disclosures and ensure officers meet survivors in person including in safe community settings, we are also keenly aware police forces have been devastated by cuts to officers, staff and PCSOs under austerity. Since 2011/12 for example South Wales Police, has had its Police Grant cut by £45million during which time the number of police officers has been cut from 3,400 to 2,800¹². Unless additional resource is provided to forces to operate the DVDS huge variations will persist in the advertisement of the scheme, in what forces disclose and how proactive forces are in making Right to Know disclosures, because forces priorities and resources are driven at a local level.
- The guidance should contain a clear recommendation as to the level of seniority required for an officer to sign off DVDS disclosures. Nominated senior officers within forces moreover should be designated as responsible for monitoring and ensuring consistent practice across all disclosures in their force.
- How will police forces performance around the DVDS be monitored and reported on? Whilst we are aware data on the number of applications and disclosures made under the DVDS is available force by force within ONS datasets on domestic abuse, this data is often very complex, largely inaccessible to survivors and specialist services, and poorly advertised. WWA recommends forces performance on the DVDS be added to the newly introduced local criminal justice scorecards¹³ whilst forces should be required to undertake survivor consultations to identify both good and poor practice.
- What research will be conducted into the efficacy of the DVDS? Though as specialist practitioners we are keenly aware the value disclosures can have on survivor's ability to make informed choices about continuing relationships or about their and their childrens safety in relation to an ex-partner – there is

¹² <https://commissioner.south-wales.police.uk/en/news/the-south-wales-police-crime-panel-supports-an-increase-to-the-police-precept-for-202223/>

¹³ <https://www.gov.uk/government/news/major-funding-boost-for-victim-services-as-local-criminal-justice-scorecards-published>

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little research available on how many domestic homicide or domestic incidents the DVDS has contributed towards preventing. WWA would recommend a longitudinal study of the effects of disclosures under the DVDS be commissioned urgently.

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