



Response to the Scottish Government's Consultation on the Proposed Domestic Abuse (Prevention) (Scotland) Bill

Which of the following best expresses your view of the proposed Bill?

Partially opposed

Please explain the reasons for your response.

Please see reasons below.

Do you think legislation is required, or are there are other ways in which the proposed Bill's aims could be achieved more effectively?

Please explain the reasons for your response.

No answer

Domestic abuse register

Which of the following best expresses your view on creating a register of those convicted of domestic abuse related offences?

Partially opposed

Please explain the reasons for your response.

We do not support the creation of a register for those convicted of domestic abuse related offences at this time in the proposed format. We would echo the concerns that have been raised by our sister organisation Scottish Women's Aid, there is not sufficient evidence to support the effectiveness of this approach in reducing or preventing offending. The consultation document does not reference the disclosure scheme that already exists and is operated by Police Scotland and we submit an analysis of this scheme would be necessary in any proposals of this nature.

The cost involved in setting up a register and maintaining it would be high. It is our considered view that these funds could be better spent on other resources to support women experiencing abuse. An example of this could come from increased funding for the legal aid budget and especially for removing means testing for protective orders (such as non-harassment orders). At present we have seen that great deal of women struggling to obtain legal representation in civil matters, including obtaining protective legal orders as there are not enough solicitors carrying out legal aid work (because of the low fees). Additionally, some women are unable to afford to pay privately and are blocked by means testing on these types of order.

Rehabilitation measures

Which of the following best expresses your view of introducing mandatory rehabilitation measures for those convicted of domestic abuse?

Partially opposed

Please explain the reasons for your response.

We again support the position forwarded by SWA. We concur with them and recognise that rehabilitation does not work across the board, some interventions work for some men, some of the time. Mandatory rehabilitation in all cases is not the answer.

Mandatory rehabilitation would also be very costly and concerns have been expressed around how effective it would be in the majority of cases.

Data - Which of the following best expresses your view of the proposals for data collection and reporting set out in this document in bold on pages 30 and 31?

Supportive

Please explain the reasons for your response including what information could usefully be collated and which groups in society could most benefit from improved information on their access to domestic abuse services and support.

We fully support the proposals for data collection and reporting set out in this document. We especially support the collection of data which would give an intersectional approach to understanding domestic violence and how this affects marginalised communities. This would help us greatly with the work we do and offer better insight in how to deliver our services to all women

experiencing GBV but particularly those who have intersectional inequalities and from marginalised communities.

Education

Which of the following best expresses your view of introducing mandatory education in schools on domestic abuse?

Partially opposed

Please explain the reasons for your

While we are generally supportive of the concept of increased education and awareness raising for young people regarding gender based violence but we concur with SWA that mandatory education is not the way forward. Making something mandatory is not a good approach to the delivery of this type of education. There are some situations where this would be inappropriate and could be traumatising to particular young people.

We are particularly concerned about the way that this is delivered, the responsibility for preventing violence against women and girls should not be placed on them to police. Awareness needs to be given for the fact that some young people will live in households where there is domestic violence ongoing and there are specific care needs merited by this. We can see that education about relationships between young people would be very beneficial to some as we are increasingly aware of young people experiencing domestic violence in relationships with other young people from a young age.

Whole school programmes have been shown to work best in trying to change attitudes so any education cannot be a one off. The Rape Crisis Scotland prevention programme provides a good model which has been shown to have a positive impact. More information can be found here; [Prevention | Rape Crisis Scotland](#).