



## Response to the Greater Manchester Gender Based Abuse Strategy

*“When I left home, I went to many organisations, many churches and they all turned me back saying I had no recourse to public funds. I was scared of the Home Office, I was scared of the police, I was scared of my in-laws, and I was scared of my own family and community. I was feeling like the whole world was against me. The abuse, the violence – it is killing you and you can’t report it, you can’t tell anyone because of the fear of immigration and my abuser knew that.”*

Safety4Sisters welcomes the sharing of the draft Greater Manchester Gender Based Abuse (GBA) Strategy 2021-2031 and the opportunity to offer a response. Since 2009, we have worked with women subjected to the intersection of gender-based violence (GBV) and the exclusion of migrants from protection including through the no recourse to public funds (NRPF) condition. Based on this experience working with some of the most socially excluded and marginalised in Greater Manchester, we detail below suggestions for strengthening the strategy so Greater Manchester provides a safety net for all, including migrant women.

We write amidst several interlocking crises. Over a decade of austerity has cut services to their barest bones so they struggle to provide care to all in need, with a threat of more cuts to come which will fall disproportionately on women and girls. Moreover, Greater Manchester’s migrant population faces a hostile environment while decisions around the UK’s withdrawal from the European Union (EU) has left many EU nationals pre-settlement without recourse to public funds and increased the numbers of destitute and homeless women. Finally, the pandemic has worsened the incidence, frequency, and severity of violence for many women and girls, widened pre-existing class, gender, race, and other inequalities, and increased the complexity and difficulty of supporting survivors. Given these realities, we welcome the following areas of the strategy:

- Ambition for fundamental and transformative change over the next decade
- Premise that policing and criminal justice is only one part of the solution (p 10) and commitment to a holistic approach (p 4)
- Recognition that poverty, economic insecurity, and other inequalities, including immigration status, compound vulnerability to victimisation (p 4)
- Efforts to be intersectional, such as addressing migrants’ barriers and training providers in how to work with those with learning difficulties, autism or neurodivergence (p 8, 20)
- Commitment to developing a bespoke plan to address the needs of male survivors (p 17)
- Endorsing a firewall to protect migrant women from criminalisation/ deportation (p. 18)
- Investment in pilot projects around prevention and early intervention (p. 19)
- Desire to put victims at the heart of services (p. 35)
- Acknowledgement that some services are less accessible and plans to undertake a comprehensive scoping exercise on whether services are meeting the needs of all (p. 38)
- Commitment that victims’ services are accessible to all, regardless of contact with the police, immigration status and whether they have recourse to public funds (p. 39)
- A unified strategy rather than following the government’s approach of separating out domestic violence into a standalone strategy

Like many within GMCA with whom we have spoken, we believe Greater Manchester can adopt a different approach to elsewhere, using our devolved powers to support survivors, ensure more effective prevention, and redress the harms of austerity, the pandemic, and the public health crisis that is GBV. It is in this spirit that we write this response. We now turn to detailing our overarching areas of concern and suggestions for addressing them before providing detailed recommendations, following the strategy’s structure.

## Our overarching concerns and recommendations

1. **A city of sanctuary action plan.** While the Mayor's commitment to Greater Manchester becoming a city of sanctuary is welcome, it needs to be translated into minimum standards and concrete practice. An action plan should be developed with organisations that work with migrants, asylum seekers, and refugees, including survivors of violence. > *The strategy should commit to developing a city of sanctuary action plan, including for migrant survivors of violence, to be overseen by the Deputy Mayor with regular reporting to the Board and Race Equality and Women and Girls' Panels.*

2. **The use of conceptually unclear terminology.** The term 'gender-based abuse' is not a defined and recognised term, unlike violence against women and girls (VAWG) or gender-based violence (GBV). The latter was formally adopted in the UN Declaration on the Elimination of Violence against Women 1993, on the initiative of women's rights activists, to make a clear link between patriarchal power relations and violence and underline the state accountability to address gender inequalities. While we understand the term 'gender-based abuse' was chosen to be inclusive of controlling and coercive behaviour, this decision is based on a misconception as to what GBV means. It indeed covers controlling and coercive behaviour in addition (see box with relevant parts highlighted in italics). Moreover, the strategy rightly recognises that most victims of gendered violence are women and girls but does so without identifying that violence against cis women and girls, trans people of all genders, and people of non-binary and third genders, rooted in their structural subordination in the gender hierarchy, has different root causes to that perpetrated against cis men and boys. As a result, it confuses diverse experiences and drivers of violence and ignores the need for different approaches to tackle violence. > *The strategy should use GBV, defining it in line with already existing global practice, rather than creating a new term with no historical antecedents.*

### Declaration on the Elimination of Violence against Women 1993

#### Article 1

'For the purposes of this Declaration, the term "violence against women" means any *act of gender-based violence* that results in, or is likely to result in, physical, sexual or *psychological harm or suffering* to women, including threats of such acts, *coercion or arbitrary deprivation of liberty*, whether occurring in public or in private life.'

3. **Over-emphasis on criminal justice and policing.** While the strategy states GMCA will take holistic and survivor-centred approaches, this commitment is not reflected in its content. Not only are some approaches, such as the presence of police officers in schools, highly concerning (more below), but there is comparatively lesser text and fewer commitments in areas such as safety at the point of crisis, addressing stigma, recovery and healing, prevention, and social norms change. Moreover, there is scant mention of community and VAWG specialist services which many women survivors rely on and the need to better support them, including through ring-fenced funding. > *The strategy should refocus away from policing towards survivor-centred approaches in line with our detailed recommendations below.*

4. **Insufficient action on prevention and social norms change.** While it is important to work with children and young people on rights to bodily autonomy, healthy relationships, and enthusiastic consent, this cohort is not the only age group requiring social norms and prevention work. Across society, there is a need to challenge GBV myths and stereotypes, tackle stigma, expand conceptualisation of violence, and support communities, families, workplaces, and neighbours to challenge perpetrator behaviour. > *The strategy should commit to reviewing evidence on what works to prevent violence<sup>1</sup> to adapt it to Greater Manchester and that a clear direction in this regard will be made towards the end of 2021.*

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<sup>1</sup>Please see <https://whatworks.co.za> for more details.

5. **Concern over plans for mediation between victims and perpetrators.** The strategy commits to support mediation without addressing pressures that keep survivors in abusive situations. These pressures are amplified for migrant and minoritised women who face demands not to bring the family into dishonour and shame and resolve violence within the family rather than seek assistance from the state. Women have been killed by partners after and during attempts by police and other service providers to mediate. We are concerned that agencies may be incentivised to encourage survivors to mediation to cut costs, at risk to women's lives. We do not want any survivors to be injured, killed, or face further violence due to this approach. > *The strategy should commit to offer survivors a range of services and options and work with specialist VAWG service providers to put in place mitigation measures to reduce risks of families pressuring survivors to pursue mediation.*

6. **Little learning of the impacts of the pandemic, on institutional racism, and on violence against minoritised survivors.** The past year has raised awareness of racial injustice, gender discrimination, and GBV. While the strategy tries to integrate awareness of inequalities, it does not do so in a sustained manner. It also does not analyse how government policy, for example around immigration that allow perpetrators to abuse power, has augmented or mitigated GBV and what can be learned. > *The strategy should commit to a lessons learned process on COVID-19, race, immigration, and violence.*

## Key priorities

- ◆ **Add to priority two support for and resourcing (including through ring-fenced funding) to community, GBV and other key services such as immigration legal aid and interpretation, particularly those run by and for minoritised (BME) women.**

This priority rightly focuses on improving service provision but does not mention non-statutory services crucial for survivors (see box) including specialist GBV services, interpretation, and immigration legal aid.

Testimonies of female survivors of sexual violence across Greater Manchester show they cannot access the support they need:

- 56 percent of the 366 survivors surveyed had still not accessed any type of support
- Major barriers to support include lack of services and information on services, poor quality of services, not been referred to services after reporting to the police, and not being believed including by professionals and counsellors
- BME women are particularly concerned about awareness, language barriers, fear of not being believed, and the sceptical attitudes of the police and other professionals
- Migrant and refugee women with insecure immigration are afraid to report violence for fear of deportation, made worse by the hostile environment
- Only 24.4 percent of survivors who approached the police found their response helpful
- Only 28.5% of survivors who approached specialist services linked to the criminal justice system found them helpful, including due to pressure to involve the police
- Services offered by independent women's rights organisations had significant higher satisfaction rates: 70.4 percent of survivors judged them to be helpful

Kate Cook, Becky Clarke, Cate Allison, Charlotte Hand, Anne Stebbings, Alison Loble, Blessing Bashorun, Sara Hussain, and Saffron Mir, 'Voices of Survivors: Hearing Women for Change,' (Manchester Metropolitan University, Manchester Action of Street Health, Manchester Rape Crisis and Trafford Rape Crisis, 2018).

- ◆ **Reword priority three as a broad ranging commitment to intersectional approaches with illustrative examples rather than focusing only on understanding of frontline staff**

This priority should explicitly commit to taking intersectional approaches, encompassing understanding of how poverty, economic insecurity, and other inequalities compound, in its delivery, including through data collection, training, improving service provision and quality, prevention, anti-stigma work, social norms change, and addressing barriers to seeking help.

- ◆ **Expand priority nine beyond measuring effectiveness to cover ongoing monitoring, evaluation, and learning**

This should include a specific lessons exercise (as discussed above) as well as commitment gathering, collation, and disaggregation to inform policy going forwards.

- ◆ **Recognise the role of GBV services in primary, secondary and tertiary prevention**

At present, this section only recognises the role of the police and health services. The absence of GBV services, often first responders, is a notable omission which must be remedied.

## **Tackling Gender-Based Abuse in Greater Manchester**

### *What is Gender Based Abuse?*

- ◆ **Use gender-based violence instead of gender-based abuse**

As described above, the use of GBV links to a clear analysis understood by all in contrast to developing new terminology delinked from decades of analysis, research, and working with survivors which adds unnecessary complication and confusion.

- ◆ **Recognise that coercive control and domestic homicide are forms of domestic abuse**

Coercive control and homicide are forms of domestic abuse yet the sentence ‘The predominant forms of gender-based abuse include: domestic homicides, domestic abuse and coercive control...’ reads as if the strategy sees domestic abuse, domestic homicide, and coercive control as separate. We understand the intent is to highlight these forms of domestic abuse so recommend rewording as ‘The predominant forms of gender-based violence include: domestic abuse (including coercive control and that which leads to homicide)...’

- ◆ **Reorder perpetrators of rape and sexual assaults so as not to feed rape myths**

The current order of ‘strangers, acquaintances, and family members’ feeds prevalent narratives that women and girls are most at risk of sexual violence from strangers whereas most perpetrators are known to them and misses out some categories of perpetrators. We recommend rewording as: ‘Rape and sexual assault perpetrated by intimate partners, family members, acquaintances, strangers, community and religious leaders, and state actors.’

- ◆ **Recognise many survivors face a complex myriad of abuses and include forms of violence currently not listed**

This section misses important forms of violence: early and forced marriage, female genital mutilation/ cutting, threats to withdraw mobility aids and medicines, immigration control (i.e. keeping people in situations of insecure immigration status, particularly when regularising status is dependent on the perpetrator, and threats to report to immigration enforcement). Moreover, the language of ‘predominant forms’ misses the realities of many survivors who experience several forms of violence and that the state can contribute to harm. Migrant women are subjected to GBV which is shored up by a patriarchal immigration system that forces women to ‘choose’ between continued violence and the risk of destitution or deportation and by a state that does not identify or respond to survivors’ gendered needs, for example with lack of childcare provision a significant barrier to finding employment that enables independence from perpetrators. Indeed, violence can be a reason for women to migrate, it can be the cause of their irregular status, and it can be a consequence of their unprotected status.

### *Gender Based Abuse in Greater Manchester*

- ◆ **Shift focus from reporting to police and securing conviction as metrics of success**

This stock take should describe survivor’s experiences of service provision, public attitudes around GBV, and the current state of work on prevention and social norm change, drawing on the wealth of research by Greater Manchester organisations and services, rather than view success via a crime and punishment lens.

- ◆ **Add that commitment to change involves reflecting on what has not been working**  
While the HMIC inspection into Greater Manchester Police is mentioned later on, it should be flagged here as an example of where GMCA will learn lessons and do better.

### *The Way Forward*

- ◆ **Commit to a city of sanctuary action plan**  
The strategy needs to reference the statement by the Mayor that Greater Manchester will be a city of sanctuary and commit to developing an action plan that outlines what it means in practice in terms of embedding minimum standards to ensure equal protection to all, regardless of immigration status, including for migrant women subjected to violence. Implementation of this action plan should be overseen by the Deputy Mayor with regular reporting to the Board and Race Equality and Women and Girls' Panels.
- ◆ **Add commitment to funding and partnership for refuges and VAWG services, including ring-fenced funding for specialist Black and Minority Ethnic (BAME) services.**  
These services provide needed and lifesaving support for survivors but support for them to provide wrap around services from crisis to recovery in trauma responsive ways is missing.
- ◆ **Ensure policy coherence by linking with the Women and Girls and Race Equality Panels**  
The strategy's way forward should set out how it links with existing work and bodies in Greater Manchester in its implementation, monitoring and evaluation, and learning processes.

### **Changing the Story**

#### *Leadership and Partnership*

- ◆ **Commit to addressing issues with the criminal justice system**  
While openness about the demands placed by the criminal justice system on survivors is important, the failure to address these issues and improve survivor experiences while meeting due process standards is an important oversight that needs to be rectified.
- ◆ **Include organisations working on service provision, prevention and social norm change on the Board and support survivors to participate**  
We are happy to see the establishment of this Board and recommend it include organisations in Greater Manchester with in-depth GBV expertise, including specialist BAME and NRPF services, and fund them for their participation. Moreover, minimal standards to enable the participation of survivors must be followed if this inclusion is to be meaningful rather than performative. These standards include provision of counselling as discussions will take an emotional toll, support to navigate and influence policy discussions, commitment to make these policy spaces truly welcoming including through addressing power relations, provision of interpreters if required, and having survivors' material needs met. Moreover, while it talks of a 'diverse range of people with lived experience,' the strategy should explicitly commit to diversity along lines of age, class, migrant status, and race.

#### *Building on Strengths*

- ◆ **Advocate for NRPF women survivors with other local governments and with national government**  
If our recommendations are implemented, GMCA will serve as a model of good practice. The Mayor must share progress made and lessons learned to persuade other local governments to adopt similar measures and argue for changes to national law and policy.
- ◆ **Add migrant status to the inequalities where greater understanding is needed**  
While migrant status is mentioned elsewhere, it is not included here.



## *Innovation, Research and Evaluation*

- ◆ Reframe innovation, research and evaluation as innovation, research, evaluation, and learning and include need for better data collection, collation, and analysis

The strategy should commit to data improvements with regards to NRPF. More rigorous qualitative and quantitative data,<sup>2</sup> a shared working definition of NRPF, and a standardised GMCA protocol for recording NRPF presentation and outcomes will provide an evidence base for developing and adapting interventions and enabling monitoring, evaluation, and learning. This process must involve statutory sector leads in social services, housing, police, health and probation, domestic abuse strategic leads, and VAWG services and organisations.

## *Supporting the Sector*

- ◆ Add a new sub-section on Supporting the Sector that outlines how GMCA will support and enable those already working on GBV

At present, the strategy does not recognise the integral role played by GBV services including refuges. We recommend adding a new sub-section and making commitments around:

- 1) ensuring the Board will be accountable to the sector
- 2) providing multi-year funding for services, including ring-fencing funding for specialist services led by and for BME, disabled, and LGBTQI people
- 2) guaranteeing distinctive support for NRPF survivors is incorporated into all commissioning processes and specifications (including interpretation, safe accommodation, and transport)

## **Mobilising Greater Manchester**

### *Engaging the Public*

- ◆ Make all public engagement accessible for migrant and otherwise marginalised women

Any strategic communications campaign must be produced in different languages and reach migrant communities. A campaign should let all women experiencing violence know help is available and how to access it, tackle issues of concern (such as data sharing with immigration enforcement), and advise colleagues, family, friends, and neighbours how to support them. It should include specialist groups in design and implementation and be adequately resourced.

### *Working with Universities and Colleges*

- ◆ Conduct outreach to international students, staff and their partners and dependents

Manchester attracts high numbers of international students and members of staff, including from EU countries, to its universities and colleagues. Information on services available (including specialist ones), how to access them, and how to support those they suspect may be subjected to violence should be included in orientation packs for students, socialised among the student and staff body, and be part of specific outreach to partners and dependents.

### *Working with Employers*

- ◆ Commitment to data collection on the prevalence and nature of sexual harassment, developing a Code of Practice for employers, and pushing for legislative change

Data should include all forms of workplace sexual harassment, including racialised forms and in precarious and zero hours contracts jobs. GMCA should also encourage employers to sign up to a Greater Manchester Code of Practice to prevent and respond to sexual harassment at work. Finally, GMCA should use evidence gathered to push for a statutory Code of Practice and to adapt the current regime of employment rights to the new nature of work.

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<sup>2</sup>For example, on the numbers of migrant survivors presenting with NRPF, whether they are accommodated or turned away, their outcomes, and their challenges and barriers accessing assistance.

## Supporting Victims and Survivors.

### *Accessible and Inclusive Service Provision*

- ◆ Explain the added value of the Trusted Referrers' Scheme and how it will reduce the need for survivors to repeat stories or be reassessed

Please provide more information about what is being suggested and how it is different from how these organisations, groups and educational establishments already refer cases. If there are any data sharing changes envisaged, please outline how data will be safeguarded, how issues around digital safety and security will be addressed, and meaningful consent sought.

### *Responding to Diversity*

- ◆ Commit to providing services with either the funding for or access to free interpretation so language is not a barrier to safety

Many migrant survivors lack the necessary English to access healthcare, housing and legal services and welfare benefits. Access to quality interpretation is a pre-requisite to providing support and needs to be included here.

### *Safety and Justice*

- ◆ Expand the notion of safety and justice away from focus on the criminal justice system

Survivors' own perceptions of safety and justice are more wide-ranging, including support workers at crisis to discuss options and coordinate access to services, specialist emotional support, counselling, and group work to address trauma and support recovery, safe shelter, injunctions against perpetrators, interpreters, and legal aid including immigration legal aid.

- ◆ Commit to addressing problems with policing processes and the criminal justice system

We are concerned about the opening paragraph which appears to accept disincentives to following criminal justice processes rather than remedying a poor system. We ask for this section to be rewritten look honestly at the barriers survivors face and what is within GMCA's power to address. For example, it should outline how it will respond to the recent HMIC report which found that Greater Manchester Police does not record more than one in four crimes of violence against the person and is failing to safeguard victims from harassment, stalking, coercive and controlling behaviour, domestic abuse.<sup>3</sup>

- ◆ Reiterate commitment to ensuring safe reporting and define what this means in practice

This section should commit Greater Manchester Police to developing and socialising guidelines that officers will not share information on migrant survivors with immigration enforcement, establishing safe reporting pathways for migrant victims and witnesses, and engage in public information campaigns about these actions.<sup>4</sup>

### *Housing and security*

- ◆ Replicate Manchester NRPF Social Services team good practice across Greater Manchester

The NRPF team of Manchester Social Services provides an important safety net for women experiencing domestic abuse who have NRPF, are eligible for the Destitute Domestic Violence Concession, and who are street homeless and initially would not be eligible for housing

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<sup>3</sup>Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services, 'Greater Manchester Police: An Inspection of the Service Provided to Victims of Crime by Greater Manchester Police,' 2020, p. 4, p. 8,

<sup>4</sup>Doing so would be in line with recommendations made in response to a recent super-complaint on this issue: College of Policing, Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services, and the Independent Office for Police Conduct, 'Safe to Share? Report on Liberty and Southall Black Sisters' Super-Complaint on Policing and Immigration Status,' 2020.

support. The team offer immediate safe temporary accommodation and refer women directly to an immigration lawyer to regularise their status, resolving their NRPF condition so they can have access to public services, within usually 10 days. We applaud Manchester for this practice and recommend that it be extended so there is consistency across GMCA.

- ◆ **Improve the provision of A Bed Every Night for NRPF survivors of violence**

At present, only four spaces across GMCA are for NRPF women specifically and other spaces are mixed and unsuitable for women who have experienced violence. The number of safe, women- only spaces for NRPF women should be increased to at least 20.

- ◆ **Establish an annual NRPF fund of at least £100,000 from GMCA sources not subject to the NRPF condition (such as the We Love MCR Charity) dedicated to unprotected survivors while they regularise their immigration status**

At present, survivors of violence who have NRPF<sup>5</sup> face difficulties accessing refuges and shelter: 100 percent of women referred to us in 2020 who wanted refuge space were initially refused one due to the NRPF condition. As a result, migrant women and their children are left in high-risk situations with violent perpetrators, often with inadequate explanations offered as to why accommodation and safety could not be provided by statutory services. Developing a NRPF fund to support such women would meet their housing and other urgent needs while they regularise their immigration status. Safety4Sisters data<sup>6</sup> indicates £100,000 should be initially allocated and more robust data collection can help inform future budgets.

- ◆ **Translate the pledge to be City of Sanctuary into concrete action when it comes to housing**

In addition to the recommendations listed above, this section should guarantee to break down barriers for vulnerable migrants needing housing and safe accommodation, enable all refuges across Greater Manchester to take in women with NRPF, and not evict asylum seeking women.

## Meeting the Needs of Children and Young People

### *Early Intervention*

- ◆ **Remove the proposal to dedicate full time police officers to schools**

We strongly believe police officers should not be in schools, particularly given HMIC findings of poor police performance on responding to crimes against the person including GBV, the risks of institutional racism manifesting in police treatment of children, further increasing racist and classist disparities in educational outcomes and school exclusions, and the likelihood police presence will lead to a culture of fear and hostility. A Greater Manchester community perceptions study found almost 9 in 10 respondents feel negative about a regular police presence in schools and almost 3 in 4 parents or guardians have concerns about sending their children to a school with a regular police presence.<sup>7</sup> Responses from young people who attend Greater Manchester schools with police presence were also overwhelmingly negative with police officers seen as ‘intimidating’, ‘threatening’, ‘rude’, ‘inappropriate’ and ‘very biased’ with students of colour, particularly Black students, treated particularly harshly.<sup>8</sup> Moreover,

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<sup>5</sup>Women on spousal visas who experience domestic violence can access the destitute domestic violence provision, local authorities can use their powers to provide accommodation and/ or financial support for families with children under the Children Act 1989, and single women with needs under the Care Act 2014 can access public funds.

<sup>6</sup>From April 2020 to March 2021, Safety4Sisters spent £82,288.53 on accommodation and subsistence costs. This money was spent on providing 31 women who were unable to access refuges due to their immigration status with accommodation and/ or subsistence (average of £2,077 per year per woman), 21 women with accommodation, and 10 women with living subsistence. Of the 125 calls for referral, advice and advocacy that Safety4Sisters received during this time, 38% were calls from Greater Manchester statutory services.

<sup>7</sup>Laura Connelly, Roxy Legane, Remi Joseph-Salisbury, ‘Decriminalise the Classroom,’ (Kids of Colour and Northern Police Monitoring Project, 2020), p. 1.

<sup>8</sup>Laura Connelly, Roxy Legane, Remi Joseph-Salisbury, ‘Decriminalise the Classroom,’ (Kids of Colour and Northern Police Monitoring Project, 2020), p. 10.



there is no evidence to show presence of police officers in schools prevents or enables better response to GBV. Indeed, prevention lies not in increased policing but rather through interventions focused on social norms and providing support to children and young people.

- ◆ **Include support services for children from migrant and asylum-seeking families**

There is scant reference to children from families in the asylum system and with NRFP. Migrant children whose mothers have been subjected to violence and who have experienced violence themselves often have to move more times to find safety, increasing levels of trauma and feelings of lack of safety and precarity. We recommend increased therapeutic and counselling services and the funding of children's workers within refuges to protect children from harm and support their recovery. Moreover, there needs to be an fundamental overhaul of social services training and practice on Section 17 duties<sup>9</sup> which is currently ad-hoc, varies depending on location, and is highly patchy in supporting migrant children.

## **Responding Effectively to Perpetrators**

### *Perpetrator Interventions*

- ◆ **Expand the DRIVE programme and community-based perpetrator programmes to address the differing needs of BAME communities**

Perpetrator projects tailored to the BAME communities should take a participatory approach focused on taking survivors' perceptions and suggestions as their starting point, supporting families and men to identify needs, mitigate against stigmatisation and pathologisation of these communities, encompass the complexity around harm caused by multiple family members, provide practical and emotional support for behavioural change, and give sustainable funding to specialist organisations working to tackle the root causes of abuse.<sup>10</sup> This approach should include research to test and evaluate culturally grounded and contextually situated interventions adopting a mixed methods approach to identify the impact of tailoring interventions including barriers and facilitators to potential engagement.

### *Innovation and Restorative Justice*

- ◆ **Commit to offering survivors a range of services and options and to working with specialist service providers to mitigate risks of families pressuring survivors to pursue mediation**

While restorative justice is an important option for all victims of crime, we are concerned about mediation in GBV cases. As explained above, mediation has worrying connotations for women and girls who come from backgrounds where they face cultural and community pressures to accept continued violence. Experience, for example the killing of 21-year-old Vandana Patel by her abusive husband in a police station domestic violence unit in 1991, shows mediation can lead to dangerous outcomes.

## **Improving Policing and Criminal Justice**

### *Accountability to victims and witnesses*

- ◆ **Put in place accountability of Greater Manchester Police to the Board**

The strategy rightly recognises the need to overcome deficiencies in police services to vulnerable victims, particularly of GBV, and outlines the changes required. In addition to

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<sup>9</sup>Under Section 17 Children Act 1989, social services have a general duty to safeguard and promote the welfare of children in need in their area, including homeless children together with their families who are provided with accommodation subsequent to this duty.

<sup>10</sup>Please see Phil Price, 'Working Trans-culturally within Domestically Violent Men,' in Yasmin Rehman, Liz Kelly, and Hannana Siddiqui (eds), *Moving in the Shadows: Violence in the Lives of Minority Women and Children*, (Routledge, 2016), pp. 245-260 for reflections on working with BAME male perpetrators for domestic violence in East London.

scrutiny by the Deputy Mayor, we recommend the police be accountable to representatives of survivors and GBV services via regular reporting of progress made and evidence of improved outcomes to the new Board to be established.

### *Protecting Victims in the Community*

- ◆ **Review the efficacy of the MARAC system considering the issues women with insecure immigration status face**

The MARAC process is inconsistent across GMCA, particularly for migrant women with insecure immigration status who are often moved by social services across local authority boundaries to secure the cheapest temporary housing. This movement results in women missing vital support from Independent Domestic Violence Advisers (IDVAs) and the MARAC process does not work effectively across local authority boundaries. We find that when women move across boundaries, the MARAC in the previous area just refers them onto the MARAC in the new area, delaying immediate action to ensure safety. There have also been numerous occasions where migrant women's cases have been sent to MARAC as high risk, but the women in question do not want to move until they are sure about their immigration status. In these cases, social services, the IDVA or both are unable to provide immediate immigration advice so the women remain vulnerable in their (abusive) homes.

### **Integrating Health and Social Care**

- ◆ **Review migrant women's barriers to healthcare and address those within GMCA's powers including safe reporting to the NHS and other services**

Migrant women worry about their entitlement to free emergency health care and whether they will be asked about their immigration status at the point of access with this information to be shared with the Home Office. Other barriers to accessing healthcare include difficulties registering with GPs, lack of knowledge about how the NHS works, and limited proficiency in English. While some challenges are outside the scope of devolved powers, the strategy should undertake to address those where GMCA can make a difference.

- ◆ **Integrate combating mental health stigma into communications and social norms interventions and increase funding for mental health and peer support services**

Despite gains made in recent decades, stigma against experiencing poor mental health and trauma still exists, particularly in many BAME communities. Targeted attitudinal and behaviour change interventions are required to tackle this stigma and encourage survivors (adults and children) to access mental health support. A critical component of this support is peer support groups which increase perceptions of social connection and networks and lessens feelings of self-blame and isolation. Such peer groups, particularly those run by and for BAME survivors that provide intersectional care, should be supported and reinforced.

We look forward to continuing to engage in strategy development. For information and to be in touch please contact [info@safety4sisters.org](mailto:info@safety4sisters.org) and visit <https://www.safety4sisters.org/>.

## Annex: Safety4Sisters Case Studies

S is a woman from the Philippines who arrived in the UK on a spousal visa nine years ago. Her husband refused to support her to apply for indefinite leave to remain and was continually emotionally abusive and controlling. She had no money of her own and he would scream and tell her she was worthless and stupid. She lost all her confidence and thought she had no route out of this marriage as she was tied to him by her immigration. The emotional abuse escalated to the point where she felt he could soon turn to physical violence, so she contacted the Independent Choices Greater Manchester helpline who referred her to Safety4Sisters. At this point, she had no money, nowhere to go and no women's refuge would take her in as she was under the NRPF condition. S4S paid for her stay in bed and breakfast accommodation and gave her subsistence money for food and travel. This support gave her time and safe space to think about what she wanted to do next. S4S also supported her to access immigration legal aid which advised her she could still apply for the Destitute Domestic Violence Concession (DDVC) due to the emotional and financial abuse perpetrated by her husband. Her eligibility was established ten days after application and, once her benefits came through, S4S supported her to look for refuge space again. She wanted to stay close to Manchester but there were no refuge spaces available across Greater Manchester (except one which refused her space as she was on the DDVC outside their local authority area), so she went into a private rental house for which S4S helped with the deposit. S4S wrote a letter of support to provide evidence for her application for settlement as a victim of domestic violence. She is still struggling with poor physical and mental health, but is now safe, has a counsellor, has reported the abuse to the police, has been supported to find a family solicitor to start divorce proceedings, and is able to look to the future. She continues to receive emotional support and advice from Safety4sisters.

R is a woman who was subjected to violence from her husband, a well-known religious teacher who regularly moved back and forth between Pakistan and the UK. Safety4Sisters had worked with R since 2019, initially supporting her emotionally and to access immigration advice when she was still trying to make her abusive relationship work to protect herself from the honour-based violence with which her family in Pakistan was threatening her if she left her husband. She moved to her brother's house while her husband was away and, with advice and support from Safety4Sisters, moved to regularise her stay and claim asylum. However, her husband found her on his return from Pakistan and forced her to return to him. The next time he left for Pakistan, she again made the decision to leave. S4S advocated on her behalf to secure her refuge space using funding from the Home Office. The refuge was unaware this funding existed and so had initially refused her space. S4S went with R for her substantive asylum interview and wrote a support letter for her but, because the Home Office could not secure payment immediately and the refuge was unwilling to take her until they had an agreement with the Home Office in writing (and a negative COVID test), S4S arranged a bed and breakfast for her for 5 nights, gave her travel and subsistence money, and helped her arrange and carry out a COVID test. She eventually accessed the refuge and, as her previous counsellor was no longer able to work with her, S4S offered her our private counsellor to help at this time of great trauma and change. She said, "Whenever I asked for help, Safety4Sisters is there to understand my problem as well as help me solve my problem. I was stuck in the mess and I was in limbo suffering so much then I spoke to the worker and with the help she gave me, now at least I'm in peace. I'm very thankful to Safety4Sisters for being there to help me whenever I was in need."