

Victims' Commissioner for England and Wales

Submission to the Home Affairs Select Committee Inquiry - Tackling Violence Against Women and Girls: Funding

Role as Victims' Commissioner.

As Victims' Commissioner for England and Wales, I welcome the opportunity to provide evidence to this inquiry '*Tackling Violence Against Women and Girls: Funding*'. I am committed to amplifying the voices of victim-survivors to ensure their experiences influence policy and practice across government and criminal justice agencies.

My remit is set out in the Domestic Violence, Crime and Victims Act 2004¹, My statutory duties include:

- promoting the interests of victims and witnesses;
- taking such steps I consider appropriate with a view to encouraging good practice in the treatment of victims and witnesses;
- Reviewing the operation of the code of practice issued under section 32.

My role is appointed is by the Secretary of State for Justice but is independent of government.

While I recognise that VAWG is an issue impacting multiple government departments and agencies, as my work is centred on the criminal justice system, my response focusses on the role of victim support services, victim engagement with the justice process, and the systemic issues victims face.

Summary

My response will look to address the following questions:

- 1. What is the link between how VAWG is measured and how services are funded? How should VAWG be measured?**
- 2. On what basis do bodies that provide funding for tackling VAWG (for example: government departments, police forces, voluntary organisations) currently prioritise funding decisions?**
- 3. What are the scale and nature of the challenges for accessing funding for tackling VAWG?**
- 4. How should the Government prioritise funding in a VAWG strategy?**

¹ Domestic Violence, Crime and Victims Act, 2004 (Chapter 3). Accessed at: <https://www.legislation.gov.uk/ukpga/2004/28/part/3/chapter/3/crossheading/commissioner-for-victims-and-witnesses>

I will demonstrate the need to provide adequate funding to victim support services, that provide vital support to victim-survivors of VAWG offences both within and outside of the criminal justice system (CJS). I will also highlight the need for investment in the CJS, as a key tool in tackling VAWG.

My response will define VAWG as acts of violence or abuse that disproportionately affect women and girls. It covers crimes including rape and other sexual offences, stalking, domestic abuse, 'honour'-based abuse, revenge porn' and 'upskirting. While I recognise these crimes impact men and boys, the scope of my response will focus on the experiences of women and girls. Due to the specific experiences of men and boys, and their varying needs, I continue my calls for a separate strategy to address the issues men and boys face, as outlined in my letter to Minister Phillips².

I will also take an intersectional approach. Kimberle Crenshaw coined the term "intersectionality" in 1989³ to describe how different social categories, like race, class, gender, and sexual orientation, intersect and create unique experiences of discrimination and disadvantage. As VAWG is inherently intersectional, it is important this is factored in any analysis of funding.

Despite 'girls' falling within the term VAWG, children are often siloed in policy terms. To effectively tackle VAWG, victim-survivors aged under 18 must also be considered in policy decisions and I will reference the experiences of this group in my response.

The National Audit Office's (NAO) recent report, Tackling Violence Against Women and Girls⁴, showed that the Home Office's response to the issue of VAWG has been ineffective, due to a lack of a coordinated effort across government departments, the Home Office not fully understanding the capacity and resources of other bodies, and the lack of a consistent definition of VAWG⁵.

The report found that between 2021-22 and 2023-24 the Home Office underspent by £22 million against its total £149 million budget (15%)⁶. This reduced the potential impact of the VAWG strategy. It is important that government spends any allocated funding for tackling VAWG effectively, putting the needs of victims first.

NAO's report also emphasised the need for government to take preventative action⁷. While I recognise the importance of prevention, and I encourage government to consider calls for a 'public health approach' made by the End Violence Against Women Coalition⁸, prevention largely falls outside of my remit and expertise as Victims' Commissioner. Therefore, my response, whilst highlighting the need for cross governmental working, focuses on the criminal justice system and funding victim support services.

² [Letter to the Minister for Safeguarding from the Victims' Commissioner calling for a dedicated 'Men and Boys Strategy'](#), November 2024.

³ ['Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory and Antiracist Politics'](#), Kimberle Crenshaw (1989)

⁴ ['Tackling Violence Against Women and Girls'](#), National Audit Office (2025)

⁵ Ibid. p.6-7

⁶ Ibid. 4, p.22

⁷ Ibid.4, p.33-34

⁸ ['No Small Change: Making Halving VAWG A Reality'](#), End Violence Against Women (2025).

When I refer to victim support services in this submission, I am referring to independent (non-statutory) support services, these are usually third-sector organisations and in the context of VAWG are specialist services who provide holistic support which is both 'emotional' and 'practical'.

Most victims of VAWG offences do not report to police or otherwise engage with the criminal justice system, therefore it is critical that funding for support services does not hinge on victim engagement with the CJS. In lieu of statutory mental health services⁹ and affordable/ subsidised legal assistance and advice¹⁰ many support services are providing lifesaving services to victims of VAWG which they are unable to access elsewhere. Support must be available regardless of engagement with statutory services. Funding of existing proven support mechanisms should be prioritised, while existing structures are strengthened.

Although the majority of victims do not engage with the justice system, an effective justice system is a critical tool in the government's strategic aim of halving VAWG in 10 years. To be effective the system relies on victim engagement.

However, the CJS is struggling to function:

In 2023/24 the average time taken to issue a charge/summons for Rape Offences totalled 423 days, the longest investigation time of all offences¹¹.

There are unprecedented court backlogs, with 74,651 cases outstanding in the Crown Court at the end of December 2024, a new record high¹².

Breaches of bail conditions and protective orders are routinely ignored.¹³

Measures designed to mitigate the impact of the system on victims such as those contained in the Victims' Code¹⁴ are relegated to 'nice to have' while the statutory bodies involved in the justice system struggle to meet their primary duty of delivering justice.

Victim confidence is low. My 2023 Victim Survey found that 76% of rape and sexual assault victims were not confident the criminal justice system as a whole is effective¹⁵. Low confidence, in the system leads to victims disengaging¹⁶, resulting in

⁹ ['Children's mental health services 2022-23'](#), The Children's Commissioner (2024) & ['Progress in improving mental health services in England'](#), NAO (2023) & BMA, [Mental health pressures data analysis](#) last updated March 2025

¹⁰ [Civil legal aid: millions still without access to justice | The Law Society](#)

¹¹ [Crime outcomes in England and Wales 2023 to 2024 - GOV.UK](#)

¹² [Criminal court statistics quarterly: October to December 2024 - GOV.UK](#)

¹³ [Police super-complaints: police use of protective measures in cases of violence against women and girls - GOV.UK](#)

¹⁴ [The Code of Practice for Victims of Crime in England and Wales and supporting public information materials - GOV.UK](#)

¹⁵ ['2023/24 Annual Report'](#), The Victims' Commissioner for England and Wales (2024). Accessed at:

¹⁶ [No Small Change: Making Halving VAWG A Reality](#) & ['Shifting the Scales'](#), Domestic Abuse Commissioner (2024).

increasing rates of attrition¹⁷, and risks less victims engaging in the system in the first place.

In the face of these increasing pressures and challenges, victim support services have repeatedly been found to be providing effective support to victim-survivors¹⁸.

Support services demonstrably improve engagement, mitigate the impacts of the system, and help to keep victims safe. In short, they can positively contribute to victim confidence and play a vital role in supporting women and girls at all stages of their victim journey.

In recent years these services have been playing this life saving role in increasingly challenging circumstances, with increasing demand for services coupled with funding stagnation¹⁹.

I am concerned that alongside an increase in employer national insurance²⁰, Victims' Core Grant funding administered by the Ministry of Justice and devolved to police and crime commissioners in England and Wales to commission support for victims has been cut by 4.2%. These support services are already under pressure, and without adequate funding, these services are at risk of closure.

23 organisations shared with me the impact of these funding cuts, and all reported existing financial struggles and difficulties in meeting demand. These financial cuts will only worsen their situation²¹. Rape Crisis England and Wales has also recently released a report which outlines that due to funding cuts, 78% of centre managers and directors are expecting a reduction or loss of service²².

In my response I will explore the prevalence of VAWG and victim-survivor experiences both outside and within the criminal justice system. I will outline the funding landscape and how this impacts services. I will also highlight the challenges the criminal justice system and victim support services are currently facing. Throughout, I will emphasise the value of victim support services, and the need for adequate funding of these specialist services.

¹⁷ [CPS data summary Quarter 2 2024-2025 | The Crown Prosecution Service](#) & '[Attrition Rates in Domestic Abuse: Time for a Change? An Application of Temporal Sequencing Theory](#)', Katy Barrow-Grint (2016)

¹⁸ '[Rape inequality and the criminal justice response in England: The importance of age and gender](#).' Walker, Hester, McPhee, Patsios, Williams, Bates and Rumney (2021).

¹⁹ Some funding for VAWG services is ring-fenced but despite rising inflation there has been no funding increase.

²⁰ [Changes to the Class 1 National Insurance Contributions Secondary Threshold, the Secondary Class 1 National Insurance contributions rate, and the Employment Allowance from 6 April 2025 - GOV.UK](#)

²¹ '[Spending Review Submission](#),' The Victims' Commissioner (2025) p.3

²² '[The Rape Crisis Funding Crisis: a Survey of Managers and Directors](#),' Rape Crisis (March 2025) p.6

How VAWG is measured and impact on funding.

It is estimated that over one in four women will be victims of sexual assault or attempted assault in their lifetime, and one in twelve women are victims of VAWG each year²³.

To tackle VAWG, its prevalence needs to be understood and monitored. Targeted interventions can then be put in place to support survivors and improve their experiences of the criminal justice system. The effectiveness of strategies to tackle VAWG can also be measured through regular monitoring of this data.

For the purposes of government, VAWG is currently measured through official /government data collected by institutions, such as the Office of National Statistics (ONS) through the Crime Survey for England and Wales, and criminal justice agencies. While this data is important, providing insights into numbers of victims, and their experiences, official/ government data fails to capture the experiences of certain groups and provides limited insight into victim experiences outside the criminal justice system. It is important that data collected by victim support services is also considered, and that this is factored into funding decisions.

Official / Government Data

Criminal justice agencies, including the police, Crown Prosecution Service (CPS) and His Majesty's Court and Tribunal Services (HMCTS) all capture data relating to VAWG victims. The Government uses this data to provide an overview of the justice process from report to completion in court, for example in the Criminal Justice Dashboard²⁴. Criminal Justice data is also analysed by ONS. However, this data does have limitations, which I will explore further in the 'Limitations of data' section.

Reporting and overall prevalence

In 2024, Police recorded VAWG related crime made up at least 20% of all crime record in England and Wales²⁵:

40% of this related to stalking and harassment,

37% was connected to domestic abuse, and

10% was rape and serious sexual offences (RASSO).

In the year ending September 2024, there were 69,958 rape offences recorded by the police, a 3% increase on the previous year (67,746)²⁶.

It is important to note that increases in recorded incidents are of limited use in identifying trends in offending, as in recent years there have been significant improvements in police recording practices²⁷. As a result, any increase in recorded crime may be explained by improved recording, rather than by increases in offending.

²³ [Tackling violence against women and girls](#) p.5

²⁴ [Criminal Justice Dashboard](#). Last updated February 2025.

²⁵ ['VAWG Strategic Threat and Risk Assessment.'](#) NPCC (2024) p.4

²⁶ [Crime in England and Wales: year ending September 2024- Office for National Statistics](#)

²⁷ [ibid](#)

The Crime Survey for England and Wales (CSEW)²⁸ is considered to be the most accurate measure of prevalence of VAWG as, unlike police recorded data, it captures victim-survivors of VAWG that do not report. The CSEW is a voluntary face-to-face victimisation survey, which asks people resident in private households in England and Wales about their experiences and perceptions of crime²⁹.

The CSEW for year ending September 2024 shows that fewer than one in six victims of rape or assault by penetration reported the crime to the police³⁰. Similarly, in the year ending March 2024, the CSEW estimated that there were 2.3 million victims of domestic abuse over the age of 16; however, the police recorded only 851,062 offences³¹.

Using data to measure the operation of the criminal justice system

Every quarter, the CPS releases data to summarise the main trends in prosecution performance. It captures prosecution figures, the number of policing referrals, and charging rates for offences³². The CPS keeps a central record of pre-charge and prosecution outcomes, using various case monitoring flags, such as 'child abuse', 'domestic abuse', 'modern slavery', and 'rape'³³.

For Quarter 2, 2024/25, in rape flagged cases, the volume of suspects charged increased by 13.0% from 1,052 in Q1 24/25 to 1,189 in Q2 24/25³⁴.

The CPS found completed prosecutions increased 13.4% from 1,028 in Q1 24/25 to 1,166 in Q2 24/25.

However, there were increased victim attrition rates, with 8.1% of prosecutions ending in Q2 24/25 because the victim no longer supported or was unable to support the prosecution, compared to 7.5% in Q1 24/25³⁵.

In domestic abuse flagged cases in Q2 24/25, after a defendant was charged, 12.3% of prosecutions ended because the victim no longer supported or was unable to support the prosecution, up from 11.8% in Q1 24/25³⁶.

In July to September 2024, 56% of all police recorded female rape offence outcomes were for police investigations being closed because of evidential difficulties due to the victim not supporting action³⁷. This reflects the number of victims who withdrew pre-charge.

²⁸ [Crime Survey for England & Wales](#)

²⁹ [Crime Survey for England and Wales data quality review: June 2024 - Office for National Statistics](#) last updated 2024

³⁰ [Crime in England and Wales - Office for National Statistics](#)

³¹ [Domestic abuse in England and Wales overview - Office for National Statistics](#)

³² [CPS quarterly data summaries | The Crown Prosecution Service](#)

³³ [CPS data summary Quarter 2 2024-2025 | The Crown Prosecution Service](#)

³⁴ Ibid

³⁵ Ibid 33

³⁶ Ibid 33

³⁷ [Police recorded crime and outcomes open data tables - GOV.UK](#) last updated January 2025

HMCTS also provides quarterly stats that aim to provide an overview of the performance of the criminal courts³⁸.

In October- December 2024 the duration between the case being received and completed at Crown Court for adult rape offences remained high at 378 days, 47% higher than pre-pandemic levels (258 days)³⁹.

The number of adult rape cases outstanding for more than a year in the Crown Court continues to increase and has reached a new record high. At the end of December 2024, there were 967 (28% of all outstanding) adult rape cases that had been open for over a year, compared to 898 (27% of all outstanding) last quarter.

Limitations of official/ government data

The official data currently used by government has a number of limitations.

Criminal justice agency data

The biggest limitation of the data is that those who do not engage with the system are not captured by the data, for VAWG this is the majority of victims / survivors. The barriers to reporting are complex but include, the stigma surrounding certain VAWG offences, lack of trust and/ or confidence in authorities and fear.

The Operation Soteria survey captured the voices of 345 survivor whose cases were not known to the police between 1 July 2023-30 June 2024. The most common reasons for not reporting were embarrassment or shame (57%), followed by thinking that the police would not believe them (44%), the impact on loved ones (42%), and fears they were partly to blame (38%)⁴⁰.

Another significant limitation is that the data does not reflect the victim journey through the system, individual cases cannot be tracked through the system. This is because each statutory agency collects its' own data into its own separate repository. The data cannot be easily compared because what is recorded and how it is recorded is also different across each agency.

Criminal justice agencies are poor at collecting victim demographics⁴¹, so the data also provides very limited insight into who is being offended against.

For these reasons, it is also impossible to understand trends in victimisation, such the characteristics of those who are multiply victimised.

The performance of the criminal justice system as a whole is also difficult to monitor through the data. The 'flagging' system used by the CPS makes analysing successful prosecutions difficult. The CPS uses a flagging system in their data. The

³⁸ [Criminal court statistics - GOV.UK](#)

³⁹ [Criminal court statistics quarterly: October to December 2024 - GOV.UK](#)

⁴⁰ ['Operation Soteria Rape and sexual assault survivors' experience of the police in England and Wales Survey Report II: July 2023 – June 2024'](#), K. Hohl, M. Pullerits, S. Molisso and A. Reid, (2024) p.39

⁴¹ This is something that Op. Soteria sought to address with one of the 6 pillars being 'using data-led, performance-savvy monitoring and evaluation of new investigative strategies and justice outcomes, to improve understanding of RASSO reporting and outcomes' [Operation Soteria/Bluestone: Re-examining the investigation of Rape and Serious Sexual Offences | Institute for Criminal Policy Research](#)

flag is applied as soon as the case reaches the CPS and remains until the conclusion of the case.

To illustrate this, I will use the example of a rape allegation, when the CPS receives a file from the police, it will be assigned a 'rape' flag, this flag remains on that case file for the duration of the case.

What this means in effect is that even where the CPS charges an alternative offence, or the defendant is convicted or pleads guilty to an alternative charge, because that flag remains in the CPS data, any conviction arising from that case is reported as a rape conviction.

It is relatively common for prosecutions to end via a 'plea bargain' and for the defendant to plead to an alternative offence such as an assault occasioning actual bodily harm, but this would appear in CPS data as a rape conviction.

Recording of offences is of limited use in understanding the nature and impacts of course of conduct offences such as domestic abuse and stalking because the way in which police record offences fails to adequately capture this kind of offending. The Home Office Counting Rules are of particular concern here as due to the 'principal crime rule' police record just one incident and are not obliged to record some offences at all⁴².

It is important to note that there is currently no data collected on Victims' Code⁴³ compliance within the criminal justice system. The Victims and Prisoners Act 2024 strengthened the role of Victims' Commissioner to monitor code compliance, placing a duty on criminal justice agencies to collect data on code compliance, this will not come into force until 2026⁴⁴. Levels of code compliance will be crucial to understanding the experiences of VAWG victims and increasing disengagement with the criminal justice system.

An Intersectional approach

Within police recorded crime data, victims across all minoritised groups, including LGBTQ+ communities and disabled people were underrepresented compared to the census⁴⁵.

⁴² *Briefing from the Domestic Abuse Commissioner for England and Wales: Home Office Counting Rules*. Accessed at: [2404-Home-Office-Counting-Rules-Briefing-from-the-Domestic-Abuse-Commissioner.pdf](#)

⁴³ [The Code of Practice for Victims of Crime in England and Wales](#)

⁴⁴ [Written statements - Written questions, answers and statements - UK Parliament](#)

⁴⁵ [VAWG Strategic Threat and Risk Assessment](#) p.4

Whilst research⁴⁶ suggests that certain groups of women and girls are disproportionately more likely to experience VAWG, they are also less likely to see a justice outcome⁴⁷.

Inequalities can make certain women and girls more vulnerable and at risk of violence, but it is often women and girls from minority groups that are more hesitant to engage with the justice system⁴⁸. For example, women and girls from Black and minoritised backgrounds are at greater risk of certain types of domestic abuse⁴⁹.

Black and Minoritised victim-survivors may face additional barriers to participating in the criminal justice process due to the fear of, or actual reprisals from, community members should they report; having additional language needs; and issues with their immigration status⁵⁰.

Migrant women are also less likely to report due to fears that their data may be shared between the police and Home Office immigration enforcement, resulting in this group being 'hidden'⁵¹. Those that do report face potential enforcement action at the expense of the police investigation⁵².

Disabled women and older women may face abuse from those that also support or provide 'care' to them which can add additional barriers to reporting.

When disabled women do report, police are often ill-equipped to respond appropriately, and research suggests that they are less likely to see a prosecution⁵³.

While the CSEW should capture those that do not report, the survey is also not representative of minority groups. In an unpublished paper⁵⁴, the VAWG sector found that as a household survey, the CSEW findings do not reflect the experiences of women and girls facing homelessness, and those residing in institutional accommodation such as prisons, immigration detention centres, care homes and mental institutions.

⁴⁶ ['Young Persons with Disabilities: Global Study on Ending Gender-based Violence and Realizing Sexual and Reproductive Health and Rights'](#), UNFPA (2018) & ['Disability and domestic abuse Risk, impacts and response'](#), Public Health England (2015) & ['Reframing the Links: Black and minoritised women, domestic violence and abuse, and mental health – A review of the literature'](#), Ravi K. Thiara and Christine Harrison, (2021) & [Disability and crime, UK - Office for National Statistics](#)

⁴⁷ [Criminal Justice responses to reports of sexual violence from women with learning disabilities and/or autism - Durham University](#) & [New research shows police failing to act on domestic abuse reports - ethnic minority victims worst affected - Victim Support](#)

⁴⁸ ['Victims Law Policy Paper'](#), (2021) The Victims' Commissioner p.12

⁴⁹ ['Measuring gender equality in the UK: data on violence against women and girls'](#), Caitlin Schmid, Hannah Fearnside, Nadia Rohregger (2024) p.11

⁵⁰ ['A Safe Place and a safe time'](#), Centre for Justice Innovation (2023)

⁵¹ ['Safe to share? Report on Liberty and Southall Black Sisters' super-complaint on policing and immigration status'](#), HMICFRS, College of Policing and IOPC (2020)

⁵² Ibid

⁵³ [Access to Justice? – Rape Crisis Tyneside and Northumberland](#)

⁵⁴ The VAWG sector provided the government with analysis of the available data on VAWG as part of the government's VAWG strategy consultation process.

The crime survey also relies on victim-survivors identifying themselves as victims of crime. Some vulnerable victims may not recognise themselves as victims, or do not wish to disclose their experiences to a government researcher.

There is a significant gap in our ability to measure girls' experiences of VAWG.

As the crime survey is targeted to those aged 16 and over, the experiences of girls under 16 is not represented by the survey.

Although criminal justice agency data does contribute to our understanding of the prevalence of VAWG offences committed against girls, it is inadequate as it relies on reporting. For example, under-reporting is common in Child Sexual Assault and Exploitation cases. A total of 115,489 CSAE offences were recorded by police in 2023, however it is estimated 500,000 children are experiencing CSAE every year⁵⁵.

Some disabled victims or others with communication barriers may also struggle to access the survey without support and disclosure may depend on who is supporting them during the survey interview, especially where perpetrators are also carers, this could mean that their experiences are not accurately recorded.

As outlined above certain groups remain effectively hidden in official data. Ensuring that these groups are appropriately reflected in any measure of VAWG and therefore in policy designed to tackle VAWG should be a priority for government. This is particularly the case as funding could then be appropriately targeted at interventions which will help to address some of these inequalities.

Impact on funding

VAWG is mostly measured in government/ official data through a criminal justice lens. Indeed, this criminal justice focus, means that government measures to tackle VAWG are often concentrated in the criminal justice space, with 'ownership' of successive government's VAWG strategies sitting within the Home Office. Inevitably funding is often directed to services, initiatives or measures that support the delivery of criminal justice outcomes.

VAWG is not just about criminal offending. Academics refer to the continuum of violence⁵⁶, being the concept that violence is a spectrum, encompassing various forms from subtle to severe, highlighting how different types of violence can be interconnected and overlapping, rather than isolated events. This continuum sits within a conducive context⁵⁷ where misogyny and small acts that are not offences such as wolf whistling are normalised and contribute to women and girls' overall feelings of fear or lack of safety. Government attempts to tackle VAWG need to address this context as well as acts which constitute criminal offending.

⁵⁵ ['National Analysis of Police-Recorded Child Sexual Abuse and Exploitation Crimes Report 2023'](#), Vulnerability Knowledge & Practice Programme (2023)

⁵⁶ ['The continuum of violence against women: psychological and physical consequences'](#), M W Leidig (1992)

⁵⁷ ['The conducive context of violence against women and girls'](#), Liz Kelly, (2016)

This requires a truly cross-governmental approach. This is beyond the scope of my expertise and so I do not intend to comment further but it is important to flag that this 'context' is understandably not measured in official data.

The NAO report⁵⁸ noted the need for greater focus on and funding of prevention measures and arguably one of the reasons this was largely omitted from the previous government's VAWG strategy is because of the way in which VAWG is measured in data.

Girls are noticeably absent from government strategies to tackle VAWG. As outlined above, the official/ government data does not provide a complete picture of the experiences of girls but additionally in policy terms 'children' are separated out from adults. This means that, for the most part, girls are absent from government approaches to VAWG.

For example, government has a separate strategy for tackling child sexual abuse⁵⁹. Despite considerable differences in perpetration patterns and victimisation of children across gender lines and evidence that child sexual abuse and exploitation remains a gendered crime⁶⁰, this strategy contains no gendered analysis. Despite an increased risk that girls who have experienced abuse in childhood will go on to experience further abuse and victimisation as adults⁶¹ the child sexual abuse strategy remains largely disconnected from government strategic thinking about VAWG. There remains no dedicated funding to support child victims of VAWG and virtually no investment in preventative measures.

Victim support services have repeatedly demonstrated they are invaluable in engaging and/ or keeping victims engaged in the justice system. My research shows that advocates supporting victims navigating the justice process help them to understand the investigation process and their rights, as well as aiding communication with statutory agencies⁶².

This support benefits the justice system. For example, when a victim is supported by an Independent Stalking Advocate (ISA), a conviction is secured in 1 in 4 cases in comparison with the national standard of 1 in 1000⁶³.

Studies show that victims who received specialist advocacy-based support were 49% less likely to withdraw from the criminal justice process than unsupported victims⁶⁴.

Similarly, the Operation Soteria survey which asked for rape complainants experiences of policing found that 39% of respondents who withdrew from the

⁵⁸ [Tackling violence against women and girls](#)

⁵⁹ [Tackling Child Sexual Abuse Strategy - 2021](#)

⁶⁰ In 2023, [The College of Policing and National Police Chiefs' Council 'Vulnerability Knowledge and Practice Programme'](#) found that 79% of victims were female.

⁶¹ [People who were abused as children are more likely to be abused as an adult - Office for National Statistics](#) last updated September 2017

⁶² ['Going above and beyond: Mapping the provision and impact of Victim Advocacy in the Criminal Justice System'](#), The Victims' Commissioner (2024) p.20

⁶³ ['10 years of the National Stalking Consortium'](#), Suzy Lamplugh Trust (2024) p.3

⁶⁴ ['Rape inequality and the criminal justice response in England: The importance of age and gender.'](#)

criminal justice process felt that having access to a support worker would have helped them to continue⁶⁵.

As a result, Commissioners, particularly Police and Crime Commissioners (PCCs) fund advocacy services, such as ISVAs and IDVAs with a view to supporting victims navigating the justice system.⁶⁶

This is sometimes at the expense of other types of service such as therapeutic interventions.

Recent years have seen an increase in PCCs funding in-house advocacy services and Victim Hubs, which are not independent from the police. In this 'Victim Care Model,' Victim Care Officers are in-house advocates who operate from police stations and are integrated with wider police staff⁶⁷. These officers have access to victim case information but receive less specialist training and often have more generalised roles.

As success is often measured in terms of criminal justice interventions and convictions, the focus on offending in terms of measuring VAWG can dictate the type and availability of support offered to victims.

However, the majority of victims do not engage in the justice system. Those who do not engage with the justice system should still be able to access holistic, specialist support from services.

I am concerned, given the criminal justice framing of much government analysis and policy work in this area, that recent real terms funding cuts to victim support services, may lead to scarce funding being allocated to those victim support services that benefit the criminal justice system. I will explore this further in the 'challenges for support services' below.

Support services' independence from criminal justice agencies is particularly important in ensuring that there are opportunities for advocacy services to foster trust with victims, particularly those of a younger age and those that may be more distrustful of the police⁶⁸. By engaging with a service, victims can then make an informed decision whether to report or not. It is crucial that victim-survivors who do not report are still provided with safety advice and emotional support.

In addition, the lack of representation of minority groups in government collected data means there is limited awareness of the needs for these specialist 'by and for' services⁶⁹.

The priorities of a survivor from a minority group(s) can vary, and research has found these survivors are less focused on criminal justice outcomes. Their needs are

⁶⁵ [Operation Soteria Survey Report II](#), p.42

⁶⁶ ['Response to 'Delivering justice for victims: A consultation on improving victims' experiences of the Criminal Justice System'](#) The Victims' Commissioner (2022) p.61

⁶⁷ ['Going above and beyond'](#) p.35

⁶⁸ ['Going above and beyond'](#) p.46

⁶⁹ Services designed and delivered by and for the users and communities they aim to serve.

centred around safety planning, securing accommodation, and receiving emotional support⁷⁰.

It is important to recognise minoritised communities often prefer specialist support from 'by and for' services⁷¹. As these services are provided 'by and for' the users and communities they aim to serve, they are more likely to be trusted by the survivors and communities they support, due to their understanding of the discrimination they may face⁷².

Rape Crisis' recent report, *Not Safe Here*, highlighted the benefits of 'by and for' services for migrant, refugee, and asylum-seeking women, as their research found these services provided a 'safe space' for survivors, resulting in an improvement in their wellbeing and feelings of isolation⁷³.

However, due to the Commissioning landscape, 'by and for' services can face additional barriers in securing funding. The funding landscape is complex with a competitive tendering process leading to smaller organisations being missed. In their report '*Survival to Sustainability*', Imkaan found that services supporting Black and minority ethnic groups encountered disadvantages in the commissioning process, as commissioners favoured bidders who had a larger reach in terms of numbers, and did not recognise the value of the resources these services can provide such as inhouse translators⁷⁴.

This 'one size fits all approach' means these specialist organisations often must compete amongst themselves for smaller pots of funding⁷⁵ or form coalitions with larger services, which are sometimes exploitative. As a result, there are often fewer specialised services being made available⁷⁶.

How VAWG should be measured

The Government fails to draw on the wealth of data collected by victim services. Victim support services data offers an indication of support provision, the experiences of those accessing support, as well as the outcome of such support in ensuring victim safety. 'By and for' services also capture the experiences and barriers underrepresented groups face.

Other potential measures

To effectively measure VAWG, the data collected by criminal justice agencies, the Office of National Statistics, and victim support services must be combined. This will provide a more complete picture of the level of VAWG in society and victim experiences. By identifying areas of concern through this data, funding can be

⁷⁰ '[Measuring gender equality in the UK](#)' p.12

⁷¹ '[A Patchwork of Provision](#)', the Domestic Abuse Commissioner (2022), p.5-6

⁷² '[A Whole-Society Approach to ending Violence against Women and Girls: VAWG Sector Manifesto](#)' VAWG sector, (2023) p.33-34

⁷³ '[Not Safe Here](#)', Rape Crisis (2024) p.83-84

⁷⁴ '[From Survival to Sustainability](#)', Imkaan (2018) p.23

⁷⁵ '[Going Above and Beyond](#)' p.28-29

⁷⁶ Ibid p.28

applied more effectively and holistically, so those victims outside of the criminal justice system also receive support.

Victim services collect quantitative and qualitative data that reflect victim-survivor experiences and the effectiveness of their services. This may include measuring how the victims' well-being, and feelings of safety improved while being supported. While criminal justice data is often separated by agencies, making it more challenging to capture an individual victims' journey, services can highlight individual experiences at the point of entering a service, and exiting. This can act as a source of insight and evidence on high level emerging issues⁷⁷.

For example, following support from an IDVA service, 84% of survivors reported feeling safer, and 73% of survivors felt their quality of life had improved⁷⁸.

In their 2023-24 Annual Report, Refuge demonstrated the positive impact of their service. 96% of those surveyed said they were no longer living in fear, where needed 76% were supported to find a safe new home, and 42% reported an end to all abusive and controlling behaviour.⁷⁹ This is a demonstration of how victim safety is not only achieved through justice outcomes, but effective, specialist support. I will explore this further in the challenges for support services section.

'By and for' organisations are able to reflect the experiences of groups that may not engage with the justice system, what their priorities are, and the additional risks they may face.

However, service provision tailored to these groups can be inconsistent at a local level. To effectively understand and address the obstacles and experiences of victims from these groups, and to accurately monitor the prevalence of VAWG in all communities, it is crucial to provide funding to these services. This funding will enable them to regularly report on the barriers these survivors face and share. It is important to note the increasing prevalence of the perpetration of VAWG online.

Data from other official sources

Many other statutory bodies collect data or could be compelled to collect data which could contribute to government's overall understanding of VAWG. For example, the Department for Health and Social Care or Department for Education could potentially contribute useful data on victimisation and levels of VAWG experienced by women and girls.

Online harm

In 2024, the National Police Chiefs' Council named tech enabled VAWG as one of the biggest threats to women⁸⁰. Its evolving nature means the exact prevalence is unknown, and there are limited ways to capture this information.

⁷⁷ ['Violence Against Women and Girls Code of Practice'](#), VAWG Sector (2022) p.10

⁷⁸ [Domestic abuse response in the UK - SafeLives](#)

⁷⁹ ['Annual Report and Financial Statements 2023-2024'](#), Refuge (2024) p.5

⁸⁰ [National Policing Statement 2024](#)

It is estimated that 85% of women and girls globally have witnessed online VAWG⁸¹. However, victims often do not report their experiences, or are unsatisfied with the police report. My predecessor's report on the impact of online abuse and harassment surveyed over 500 victims, and found that of the victims that reported, only 13% were satisfied with the police's response⁸².

In a survey completed by the Open University, 56% of victims reported their concerns to the platform, but only 4% to the police.⁸³

The Online Safety Act 2023 will enable Ofcom to implement transparency reporting for online services including social media platform, this includes a requirement for use-to-user and services to report on incidences of illegal content as well as content that is harmful to children. Access to this data will help increase understanding of the prevalence of VAWG related online harm.

However, this relies on the effective implementation of this act, the online harm being identified, and services complying. Additionally, there is likely to be incidents that are missed that are not considered illegal.

Online harm is often associated with other types of offline VAWG, including stalking and domestic abuse. In my predecessor's survey, 40% of people reported that the online abuse also extended to abuse in-person⁸⁴. Victim Services can also help capture the number of victims who are impacted by Online Harm and identify emerging issues victims of VAWG face in the online space. For example, the Suzy Lamplugh Trust reported that the National Stalking Helpline has found 100% of cases now involve an element of cybercrime, such as so-called revenge porn⁸⁵.

This highlights how victim services can assist in the monitoring of emerging trends in evolving online crime.

Other Sources of Data

Other organisations and academics can also provide important insights into the experiences of women and girls.

For example:

The Children's Commissioner has undertaken research into children's experiences of online harms⁸⁶.

Girlguiding produces an annual report based on its' Girls' Attitudes Survey⁸⁷ which features sections on girls' experiences of VAWG both offline and online.

⁸¹ ['Platform Design and the Risk of Online Violence Against Women and Girls'](#), Department for Science, Innovation & Technology (2025) p.2

⁸² ['The Impact of Online Abuse: Hearing the Victims' Voice'](#), The Victims' Commissioner (2022) p.39

⁸³ ['Online Violence against women: A Four Nations study'](#), O. Jurasz (2024) p.74

⁸⁴ [Hearing the Victims Voice.pdf](#) p.14

⁸⁵ [Suzy Lamplugh Trust Response to the Ofcom consultation 2024](#) p.1

⁸⁶ ['Digital childhoods: a survey of children and parents'](#), Children's Commissioner for England (2022)

⁸⁷ [Girls' Attitudes Survey | Girlguiding](#)

Many grassroots projects enable women and girls to share experiences of violence, such as Everyone's Invited⁸⁸.

The need for research into accessibility of the justice system

In the intersectionality section above, I outline how some groups are less able to access the justice system, if the justice system is the main mechanism by which we 'tackle' VAWG then it is vital that government prioritises accessibility to the system.

In order to address barriers to the justice system, it is important that government understands who is accessing the system and who isn't and the reasons behind that.

In my 2023 Victims Survey report I recommended the MoJ undertake research to understand levels of accessibility of the system to different groups and the reasons why certain groups do not engage with the justice system⁸⁹. The then government's response to this recommendation was that increased monitoring of compliance with the Victims' Code would identify gaps. As the Victims' Code applies to criminal justice agencies it is doubtful that compliance monitoring would reveal why certain groups are less likely to engage with the criminal justice system. I reiterate that government should undertake research to understand who is and isn't engaging with the system and why, this research should also explore whether there is inequality in the likelihood of a justice outcome for those who do report and the reasons for attrition along demographic lines. This research would ensure that strategies and policies that seek to tackle VAWG through the justice system address this inequality.

How funding is currently prioritised and challenges around funding

The strong criminal justice focus in government attempts to tackle VAWG, means that funding is often flows to criminal justice agencies or interventions that otherwise support the criminal justice system.

The primary purpose of the justice system is prevention, detection, and prosecution of crime. A great deal of focus is therefore on the offender, prosecution, and conviction. The victim, whilst a critical part of the process, is valuable to the system to the degree they can assist the state in delivering justice. This means that criminal justice initiatives are often primarily targeted at improving justice outcomes and do not focus on the needs of victims or potential victims. Whilst funding to improve the criminal justice system is welcome, it must be met with increased funding for victim support services and initiatives which improve the safety of victims and/ or mitigate the impact of the system upon them.

Any funding decision must consider the needs of victim-survivors. Independent victim support services provide a route for victims of VAWG offences to receive support and practical help to ensure their safety, no matter whether they decide to report.

⁸⁸ [Everyone's Invited](#)

⁸⁹ ['Annual Victims' Survey 2023'](#), The Victims Commissioner (2024) P.37

Overview of the funding landscape

The funding landscape is highly complex. I am not able to give a detailed overview of the processes involved as this falls outside my area of expertise, but I will provide a brief overview of how victim support services are funded through government.

Several government departments fund and commission services for victims of VAWG. These include the Department of Health and Social Care, the Ministry of Justice and The Home Office. In my brief overview I will concentrate on how funding flows from the criminal justice departments, the Home Office and the Ministry of Justice (MoJ), to the independent support services, usually charities, who support victims of crime.

For the most part funding is devolved from central government to local commissioners i.e. Police and Crime Commissioners (PCCs), metropolitan mayors and others such as local authorities. Some of this funding is ring-fenced and can only be spent by local commissioners on supporting victims of certain types of offences, for example, there has previously been devolved ring-fenced funding for both domestic abuse and sexual violence support services. There is also a 'general crime' fund which is not ring-fenced. For VAWG, all of these funding streams are relevant. Local commissioners make decisions about what to commission and fund in their local area.

Historically local commissioners could choose to work together to commission support services, or they could commission separately. This led to quite a lot of regional variation in commissioning practice. The Victims and Prisoners Act 2024 will, once implemented⁹⁰, place a duty on local commissioners to collaborate in commissioning support services, commissioners must also carry out a strategic needs assessment for their area. It is hoped this will maximise outputs and improve efficiency.

There is currently no ring-fenced funding for specialist 'by and for' services and no specific duties on commissioners to commission these services.

There are also some centrally administrated funding streams which means that central government departments directly commission some services, an example of this is the 'Rape and Sexual Abuse Support Fund' (RASASF)⁹¹ which funds support services for victims of rape and sexual abuse and is administrated through the MoJ. The HO also centrally funds some of the national helplines that provide telephone support to victims of certain crime types, for example the National Domestic Abuse Helpline.

How the landscape affects funding

The devolution of funding to local commissioners has advantages and disadvantages. One of the main advantages of devolved funding is that local commissioners are best placed to understand the levels of need in their local area. A disadvantage of local commissioning is that local commissioners may have their own strategic aims or priorities which could influence commissioning decisions. For

⁹⁰ Implementation work is ongoing [vap-engagement-letter.pdf](#)

⁹¹ [Rape and Sexual Abuse Support Fund 2023 to 2025: Organisations awarded funding - GOV.UK](#)

example, it could be tempting for PCCs to favour support interventions that benefit the criminal justice system e.g. advocacy services over and above interventions which have less of a direct benefit to the criminal justice system e.g. therapy/ counselling.

My research on the provision of advocacy services in England and Wales found that accessing specialist support is currently a 'postcode lottery'⁹². Although it is hoped that the duty to collaborate will make commissioning more efficient, it remains to be seen how this will work in practice. It will be crucial that local needs assessments factor in the accessibility of specialist support, so that victims do not face this postcode lottery in the future.

Ring-fenced funding can be very useful in ensuring that support services are commissioned for victims of certain crime types. Decisions about what to ring-fence are made by central government and it is important that any changes to ring-fencing are carefully thought through. The MoJ have recently amalgamated two ring-fenced funds, one was for victims of domestic abuse and the other was for victims of sexual violence. These two funds are now a single ring-fenced fund which can be used by local commissioners to commission either or both types of support service.

It remains to be seen the effect this will have on commissioning decisions; however, sexual violence services tell me that they are concerned that this may result in local commissioners favouring domestic abuse services, resulting in reduced funding for sexual violence services. It may also result in commissioners favouring providers who are less specialist but will provide services for both victims of domestic abuse and sexual violence.

Centralised funds such as the Rape and Sexual Abuse Support Fund' (RASASF), currently ensures the viability of support services for victims of sexual violence. The government has recently piloted devolution of this funding in some areas and it is unclear what the consequences will be. For example, the sexual violence support sector are concerned that government may decide to devolve this fund and that local commissioners may favour and commission less specialised support services.

Although sexual assault referral centres (SARCs) are centrally funded, local health commissioners such as Integrated Care Boards (ICBs) rarely fund specialist VAWG services. However, they frequently refer victims and survivors to specialist services, meaning they contribute to increased demand without providing any additional funding.

Most funding rounds are short-term, less than two years, in practice some can be as short as 6 months. This has a significant impact on workforce planning and sustainability.

⁹² ['Going Above and Beyond'](#) p.46

Current challenges for the criminal justice system

The criminal justice system is facing both internal and external issues. Public confidence is declining, staff retention is poor, prisons are at capacity, and the courts backlog has reached a record high.

Victims regularly report poor experiences with the justice process, and criminal justice agencies are failing to meet their obligations under the Victims' Code.

Funding is necessary to fix the foundations of the justice system to ensure victims of VAWG have confidence in the system to deliver justice and engage. However, this has to coincide with increased funding for victim services due to their interconnected relationship.

Decline in confidence in the justice system

The rape and murder of Sarah Everard by a serving police officer led to a significant decline in women's confidence in policing⁹³. It triggered the Casey Review⁹⁴ and Angoloni Inquiry⁹⁵ which founded normalised misogyny and a lack of accountability within policing. A survey undertaken by End Violence Against Women found that 10% of women would be less likely to report sexual assault to the police following in the Sarah Everard case⁹⁶.

Around the same time (May 2021), according to Channel 4 news, one woman every week was coming forward to report their partner, a serving police officer, for seriously abusing them or their children⁹⁷. In their report on police perpetrated domestic abuse, the Centre for women's justice found that abusive behaviours were minimised by investigating officers, and that forces failed to pursue misconduct investigations after a report of domestic abuse was made⁹⁸.

The accountability structures in policing are complicated, not least as there are 46 police forces in England and Wales each with their own chief constable, who largely sets the culture and priorities for that force. The National Police Chiefs Council (NPCC) is responsible for guiding police chiefs but as an organisation it does not have any 'teeth' and cannot mandate that chief constables follow its' guidance.

Together with the VAWG sector, I want to see greater accountability in policing to address these issues.

My 2022 Victim Survey found four in five women (79 per cent) did not have confidence in the police's ability to thoroughly investigate crimes against them. After

⁹³ [Sarah Everard - Three Years On - Solace Womens Aid](#)

⁹⁴ ['Baroness Casey Review Final Report: An independent review into the standards of behaviour and internal culture of the Metropolitan Police Service'](#), Baroness Casey (2023)

⁹⁵ [The Angoloni Inquiry](#)

⁹⁶ [Almost half of women have less trust in police following Sarah Everard murder | End Violence Against Women](#)

⁹⁷ [More than 100 women accuse police officers of domestic abuse, alleging 'boys club' culture – Channel 4 News](#)

⁹⁸ ['Police Perpetrated Domestic Abuse – Has Anything really Changed since the 2020 super-complaint?'](#), Centre for Women's Justice (2024)

their experience with the police, 59 per cent were unsure about or unwilling to report to the police again⁹⁹.

Similarly, the Domestic Abuse Commissioner's research on support provision found that some survivors are more hesitant to engage with the criminal justice system when they have previously had a negative experience, while other survivors may have heard or witnessed these poor experiences, shaping their perception of the police.¹⁰⁰

In 2024, a YouGov poll found 50% of the public do not trust the police (very much or at all) to tackle VAWG¹⁰¹. This suggests how individual poor experiences may shape the overall public perceptions of the police.

Policing is the frontline in terms of victim experience of the criminal justice system. Indeed, policing remains the criminal justice agency with the greatest responsibility to victims throughout their criminal justice journey, as witness care 'sits' within policing.

This decline in confidence does not just apply to policing, victims have declining faith in other parts of the criminal justice system too.

In my victims' survey 2023, victims of all crime types reported dissatisfaction with all areas of the system, indeed only 23% of respondents were confident that they could receive justice by reporting a crime¹⁰².

The courts' backlog.

There is a great deal of focus on securing higher conviction rates, in government strategies to tackle VAWG. However, conviction rates are dependent on the willingness of victims to engage with the justice system.

The current courts backlog is now at a record high, there were 74,651 outstanding cases in December 2024¹⁰³.

My research on the backlog in the crown courts; '*Justice delayed: The impact of the Crown Court backlog on victims, victim services and the criminal justice system*'¹⁰⁴ reflects the devastating impact court delays can have on vulnerable victims.

Victims are losing faith in the court system as they face lengthy delays and often victims are disengaging altogether. This is evidenced by increasing rates of attrition; in July to September 2024, after a defendant was charged, 11.2% of adult rape prosecutions were stopped because the victim no longer supported or was unable to support the prosecution, up from 10.0% in April to June 2024 and 8.5% in January to

⁹⁹ [BLOG: As my survey shows, women are still not getting good treatment in our justice system - Victims Commissioner](#) November 2023

¹⁰⁰ '*Shifting the Scales*', p.14

¹⁰¹ [New snapshot report finds lack of trust in institutions to tackle VAWG | End Violence Against Women](#)

¹⁰² *Annual Victims' Survey 2023* p.28

¹⁰³ [Criminal court statistics quarterly: October to December 2024 - GOV.UK](#)

¹⁰⁴ '*Justice delayed: The impact of the Crown Court backlog on victims, victim services and the criminal justice system*', The Victims' Commissioner (2025)

March 2024¹⁰⁵. Whilst I welcome that the government are looking for ways to improve efficiency in the courts¹⁰⁶ and funding measures to address the backlog¹⁰⁷, in my report I make several recommendations that could ease the impact of the delays on victims whilst longer term systemic changes are made. These include, amending the criminal procedural rules to ensure that victims' needs are given equal weight to the defendants in listing decisions and raising the expense rates for victims who attend court.

My research also found that support services are crucial in keeping victims engaged whilst they wait in the backlog. Victim support services are literally the glue that holds the system together. Properly funding victim support services is cost-effective and ensures that victims remain engaged, whilst they endure lengthy delays. Emergency funding of victim support services during the courts backlog crisis is one of three key recommendations to government in my report.

Procedural Justice and the Victims' Code

In recent years there have been positive steps in the justice system's approach to VAWG. For example, Operation Soteria has led to progress in how rape cases are investigated and prosecuted. There is now greater focus on victim needs and rape investigations focus on investigating the accused (suspect-focussed) rather than the previous focus which was on the perceived credibility of victim-survivor.¹⁰⁸ As part of the policing strategy to tackle VAWG, a new national policing centre¹⁰⁹ will receive £13m in funding to ensure training is consistently implemented across forces.

However, these changes take time to implement. Research by Hohl et al in 2023 found three in four rape and sexual assault victims stated their mental health deteriorated because of what officers did or failed to do in their case¹¹⁰.

The importance of procedural justice to victims and survivors was critical to the development of the Operation Soteria National Operating Model¹¹¹. Criminal justice agencies are increasingly cognisant of victims' perceptions of fairness in their procedures and decision-making processes and are seeking to address any shortcomings. For example, the CPS now has a dedicated programme of work designed to improve their service to victims¹¹².

Many of the measures in the Victims Code of Practice¹¹³ are designed to ensure procedural justice. Compliance with the code has historically been poor and better code compliance could go a long way to achieving procedural justice for victims.

¹⁰⁵ [CPS data summary Quarter 2 2024-2025 | The Crown Prosecution Service](#)

¹⁰⁶ [Independent Review of the Criminal Courts - GOV.UK](#)

¹⁰⁷ [Swifter justice for victims as courts sit at record level - GOV.UK](#)

¹⁰⁸ [National operating model for investigating rape and serious sexual offences | College of Policing](#)

¹⁰⁹ [Funding confirmed for National Centre for Public Protection](#)

¹¹⁰ ['Relational In/Justice Journeys: Revising Procedural Justice Theory Through An Analysis of Rape and Sexual Assault Victims' Experiences of Police Investigations'](#), Katrin Hohl (2025)

¹¹¹ [National operating model for investigating rape and serious sexual offences | College of Policing](#)

¹¹² [Victims Programme | The Crown Prosecution Service](#)

¹¹³ [Code of Practice for Victims of Crime in England and Wales \(Victims' Code\) - GOV.UK](#)

The Victims and Prisoners Act 2024¹¹⁴ gives the Victims' Commissioner a greater role in monitoring code compliance, as well as placing a duty on criminal justice agencies to collect data on code compliance. This scrutiny could positively impact levels of code compliance when the powers come into force in 2026.

Under the Victims' Code of Practice, victims have a right to be able to understand and to be understood, and to be kept informed¹¹⁵.

The need for clear, timely and compassionate communication is borne out by my research¹¹⁶, and poor communication is also the subject of a great deal of the correspondence I receive.

The criminal justice inspectorates, examine communication as part of their inspections of statutory agencies¹¹⁷.

In her recent report¹¹⁸ on domestic abuse survivors' experiences of the criminal justice system, the Domestic Abuse Commissioner also highlights the importance of communication.

Communication is a two-way process, and many victims tell me that they feel dismissed, unheard, and misunderstood by the criminal justice system. The Operation Soteria victims' survey found that most respondents felt a lack of understanding from the police: only one in four (27%) felt that the police always or mostly understood what this was like for them, whilst more than a third (35%) felt that the police never empathised in this way¹¹⁹.

Poor communication has an even greater impact on victims from more vulnerable, marginalised groups. It is a structural inequality that impacts survivors who are blind, have a hearing impairment, speak languages other than English, and those who have learning difficulties¹²⁰. Measures designed to aid communication are often not implemented and/ or statutory agencies fail to identify additional communication needs¹²¹. Cases are sometimes closed after the police fail to implement measures to ensure the victim was understood¹²². Research by the sector also found that victims with communication needs fear discrimination and do not come forward¹²³.

¹¹⁴ Victims and Prisoners Act 2024 accessed at <https://www.legislation.gov.uk/ukpga/2024/21>

¹¹⁵ [Code of Practice for Victims of Crime in England and Wales \(Victims' Code\) - GOV.UK](#)

¹¹⁶ [Victim Survey 2023 & Justice delayed: The impact of the Crown Court backlog on victims, victim services and the criminal justice system](#)

¹¹⁷ [Victim Communication and Liaison scheme: letters to victims – HM Crown Prosecution Service Inspectorate](#) & ['Police response to violence against women and girls - Final inspection report'](#) HMICFRS (2021)

¹¹⁸ ['Shifting the Scales'](#)

¹¹⁹ [Operation Soteria Survey Report II](#) p.46

¹²⁰ ['Listen to us! Communication barriers: How statutory bodies are failing Black, Minoritised, Migrant, Deaf and Disabled women and girls victims/survivors of VAWG.'](#) The Communication Barriers Working Group (2024) P.3

¹²¹ ['Access to Justice: Evaluation of the experiences of people with learning disabilities who report rape or sexual assault'](#), A, Jobe, H. Williams (2020)

¹²² [Listen to us!](#) p.10

¹²³ Ibid p.6

Another right under the Victims' Code; the right to be referred to support is the most frequent supportive step taken by the police. Yet the Operation Soteria survey found that just 52% of respondents were referred to services¹²⁴. Increased procedural justice, will likely lead to more reports and it is important to consider that any increase in the number of victims reporting VAWG will increase the referrals to victim services (see Challenges for support services).

His Majesty's Courts and Tribunal Service (HMCTS) are responsible for delivering rights under the Victims' Code but many of the measures which are key to ensuring victims feel safe and supported at court are currently not being delivered. For example, many court buildings do not have separate entrances for victims and defendants and some court buildings do not have separate waiting areas. These measures, when in place have a considerable impact on victims' sense of procedural justice.

Keeping women and girls safe

The criminal justice system has a crucial role in safeguarding women and girls and yet protective measures are poorly implemented.

Victims are sometimes told to make their own applications for protective orders, despite the involvement of statutory services. Due to a lack of free or low-cost legal help, victims can struggle to navigate the application process leaving them at risk.

Additionally, breaches of bail conditions and protective orders are often ignored and understanding of risk is often poor within policing¹²⁵.

It is beyond the scope of this submission, to cover this issue in detail but I think it is important highlight these failings, as these should be a consideration of government when considering funding to tackle VAWG.

The challenges for support services

Most victim support services provide support tailored to the criminal justice system, for example, advocacy services, and support to aid recovery, for example therapy. This is regardless of the victim's engagement with the system. Although some services only provide criminal justice system support, this is unusual.

As explored in the criminal justice section above, demands on services are inextricably connected to the state of the criminal justice system. Increasing public awareness of VAWG and demands on other support providers, such as NHS mental health services, can also impact demand.

Lack of funding to meet the holistic needs of victims

Violence against women and girls can have both short term and long-term effects on survivors' mental and physical health. These offences can also impact every aspect of a survivor's life, including their work, finances, family, relationships, housing, and feelings of safety¹²⁶. Criminal justice outcomes rarely offer a complete resolution to

¹²⁴ [Operation Soteria Survey Report II](#) p.44

¹²⁵ [A duty to protect: Police use of protective measures in cases involving violence against women and girls - GOV.UK](#) last updated June 2022

¹²⁶ [The lasting impact of violence against women and girls - Office for National Statistics](#)

these devastating crimes and a successful outcome for a victim does not necessarily mean a justice outcome.

Every victim has different priorities when they enter a victim support service. Most survivors want individualised, holistic, and on-going support for as long as they feel they need¹²⁷. However, the funding and commissioning landscape means that services do not receive consistent and long-term funding, this can lead to commissioners favouring less specialised support or criminal justice focused interventions, such as those provided by SARCs or statutory mental health services¹²⁸.

When victims and survivors of domestic abuse contact a service, the Domestic Abuse Commissioner found that of the 4000 victims they surveyed, the majority sought support to cope and recover and required practical safety advice¹²⁹. Similarly, of the 14,240 survivors on waiting lists for Rape Crisis services in the year ending July 2024, over 75% were waiting for specialist counselling and therapeutic services¹³⁰.

Solace Women's Aid reported that 70% of survivors within their service have a housing need and 43% have experienced financial abuse¹³¹, this reflects the support needs of victims trying to rebuild their lives, they need support which goes beyond the criminal justice system.

This holistic package of wrap around support aims to meet the wide-ranging needs of survivors and reduce the reliance on statutory services such as the NHS¹³². The cost of VAWG to society is estimated at 40 billion annually¹³³. Women's Aid recently reported that for every pound invested in domestic abuse support services, there will be a saving of at least £9 to the public purse; this is due to the domestic abuse sector reducing domestic abuse by 5%¹³⁴.

As outlined in my predecessor's response to the Victims Law Consultation¹³⁵, current commissioning practices means that these specialist providers of therapeutic and advocacy support often receive short-term funding (1-3 years). This creates constant instability for these organisations, resulting in difficulties in retaining trained staff, and reduced opportunities to further develop these services¹³⁶. In my advocates report, I called for funding rounds to be no less than three years and for services to be funded

¹²⁷ ['Response to 'Delivering justice for victims'', p.61](#)

¹²⁸ [The Rape Crisis Funding Crisis: a Survey of Managers and Directors 2025 6 monthly update \(winter 24/25\)](#)

¹²⁹ ['A Patchwork of Provision', p.6](#)

¹³⁰ Ibid 128

¹³¹ ['Violence against women and girls, housing and homelessness: A joined up strategy', Solace \(2020\) p.3](#)

¹³² [A Whole-Society Approach to ending VAWG](#) p.33

¹³³ ['Violence Against Women and Girls: background briefing', Women's Budget Group \(2017\) P.1](#)

¹³⁴ ['Investing to save: The economic case for funding specialist domestic abuse support', Women's Aid \(2023\)](#)

¹³⁵ ['Response to 'Delivering justice for victims'](#)

¹³⁶ Ibid.

in a way that is flexible, sustainable, long term and includes provision for inflationary increases¹³⁷.

Funding cuts will only exacerbate these issues and prevent further development of services. Rape Crisis England and Wales outline the situation in their report '*The Rape Crisis Funding Crisis*'. They report that despite high demand for support, there were 41,300 referrals to Rape Crisis membership in 2023-24, due to financial difficulties, Rape Crisis centres are having to cut posts and scale back services to ensure they do not close completely¹³⁸.

In their report *A Real Safe Space*¹³⁹, Rape Crisis also highlights their provision of flexible, holistic, wraparound, and therapeutic support for child survivors and its benefits for survivors with non-linear recovery processes. Statutory services, such as Child and Adolescent Mental Health Services (CAHMs) have strict eligibility criteria, lengthy waiting lists, and restricted intervention duration, which is ineffective in meeting victim survivors needs, and often take a medicalised, clinical approach¹⁴⁰.

There are various commissioners, with overlapping responsibilities for commissioning support for children and young people and it is often not clear who has responsibility for therapeutic services. Often, commissioners such as NHS England will prioritise CAHMs services, and PCCs fund generic support services¹⁴¹.

However, as with adults, due to the demands on mental health services and the complex nature of cases involving child sexual abuse, these cases are often referred into Rape Crisis, without additional funding¹⁴².

As outlined elsewhere in this submission, on top of this, real -terms cuts to funding will have a devastating impact on services. I fear that many will simply have to close their doors permanently. Emergency funding is needed to prevent the closure of these services to ensure victims of VAWG continue to receive tailored support that meet their needs.

Commissioning processes

The commissioning processes outlined above in the 'Funding Landscape' section, can act as a considerable hurdle to services securing funding. The processes are often resource intensive, funding rounds are short and 'back-room' administrative costs, such as those involved in recruitment are not covered in the grants offered by commissioners.

Most services are having to juggle multiple funding streams, often with different reporting requirements to remain viable.

¹³⁷ '*Going Above and Beyond*' p.49

¹³⁸ [The Rape Crisis Funding Crisis: a Survey of Managers and Directors 2025 6 monthly update \(winter 24/25\)](#) p.1

¹³⁹ '*A Real Safe Space*', Rape Crisis England & Wales (2024)

¹⁴⁰ Ibid. p.6

¹⁴¹ Ibid p.14

¹⁴² [The Rape Crisis Funding Crisis: a Survey of Managers and Directors 2025 6 monthly update \(winter 24/25\)](#)

The commissioning landscape is also particularly challenging for specialist by and for services who are often very small and do not have the capacity to submit a tender for funding.

In their 2018 report 'From survival to sustainability'¹⁴³ Imkaan, outline how commissioning practices:

- Benefit larger, more well-resourced providers e.g. short timelines, complex tenders, excluding criteria such as large turnovers.
- Do not adequately embed equalities e.g. structured to favour bidders who can provide support at lower costs and have a larger reach in terms of numbers, therefore local BME 'by and for' providers are always at a disadvantage. OR
- Do not allow for meaningful intersectional work across diverse identities and/or strands of VAWG e.g. many BME providers work across the VAWG spectrum addressing issues such as domestic violence, child sexual exploitation, forced marriage and honour-based violence as a routine part of their case-work. Yet commissioning frameworks do not reflect this.
- Fail to recognise the added value/resources that BME by and for providers bring. This carries no weight in a tender process. Funders rarely pay for or recognise the 'added value' and/or social value. This might include in-house translation/interpreting, knowledge and expertise on a broader range of VAWG strands, expertise in working across complex extended family systems and international community networks. It can also include life skills and orientation support for survivors who may have recently arrived in the UK, ethno-cultural community links and expertise, and critical contributions to equality-proofing local and national strategies.

These issues can lead to these organisations being forced into coalitions with larger organisations, yet these partnerships are often very unequal and can lead to exploitation of the specialist by and for service¹⁴⁴.

Increasing demand

Demands on services are increasing. There are a variety of reasons for this. These can include increasing referrals from statutory services such as health services as a means of meeting demand. There is also a greater awareness of the existence of services amongst the public which increases self-referral.

Where interventions are tailored around the criminal justice system, the significant delays in the system mean that victims remain in services for longer and due to the impact of the delays on victims. Those supporting them are having to deal with increased support needs in addition to supporting people for longer periods of time.

With the increasing backlog, there needs to be recognition of the growing demand on victim services. Frequent adjournments result in increased caseloads for advocates as victims' cases go on for longer. Due to these caseloads, services are forced to compromise the quality of their service provision. For example, Rape Crisis centres

¹⁴³ ['From Survival to Sustainability'](#)

¹⁴⁴ ['Uncivil partnerships? Reflections on collaborative working in the ending violence against women and girls sector'](#), Ascent (2017)

currently have about 14,000 survivors on their waitlists. Some centres have even been forced to close their waitlists, due to growing demand and insecure funding¹⁴⁵.

Ironically increased political attention to VAWG, especially coupled with media attention, can also increase demand, particularly if victims are encouraged to come forward and report. It is a Victims' Code right to be referred to support services but for a victim a referral is meaningless if there is a waiting list or worse if a service has had to close its' doors either to new clients or permanently.

Complexity of casework

Support services tell me that the complexity of their caseloads is increasing. As outlined above, many services are having to fill the gaps in statutory provision. This means that 'support' can be a mixture of advocacy and therapeutic interventions, as well as legal or social advocacy and assistance, such as help with housing, benefits or the law.

This complexity also means that victims / survivors are being 'supported' longer.

Vicarious trauma burnout and staff retention

Staff working in support services also struggle with these increasing demands. Staff are at high risk of experiencing vicarious trauma, compassion fatigue and burnout. To mitigate these issues, services usually provide some form of professional supervision and clinical supervision in the form of therapy, for some roles this is mandated in guidance for example advocacy roles¹⁴⁶, however funding does not usually cover these and other 'backroom' costs.

Support services can struggle to retain staff as they cannot compete with other employers in the marketplace. This is particular the case for therapists who can command higher salaries privately or in the NHS than they are able to command in the third sector. Additionally, due to the very short-term nature of most grants, there is a high degree of employment uncertainty, with the potential of redundancy every couple of years and for many this level of instability is incompatible with their lifestyle.

Every recruitment round requires additional 'backroom' admin costs, which are not covered by the grant.

For example, the average time it takes to recruit and train an ISVA varies, but generally training takes 6 months or more; some ISVAs will be in post for several months before they are trained to ensure their suitability for the role. Recruitment will depend on several factors, including whether the person applying is already trained, their notice period and other factors¹⁴⁷. With IDVAs, it is around 2-4 weeks for recruitment, followed by up to 5 months training¹⁴⁸.

¹⁴⁵ [Sexual violence services are not being prioritised by politicians | Rape Crisis England & Wales](#)

¹⁴⁶ [The Role of the Independent Sexual Violence Adviser: Essential Elements](#), Home Office (2017) & DRAFT Independent Sexual Violence Advisor Guidance accessed at [draft-ivsa-statutory-guidance.pdf](#)

¹⁴⁷ Sources Lime Culture and Rape Crisis England and Wales

¹⁴⁸ According to SafeLives

In general, ISVAs commitment to a client will be at least 6 months and with the backlog can often stretch to several years, this is problematic in the context of 6 month or other short-term funding.

Further, evidence suggests burn out is high, with an ISVA, on average, staying in post for just 2 years and 9 months¹⁴⁹. In 2021 Safelives told my office that they had trained just over 3000 IDVAs since 2005, but their 2020 survey found that there were just over 1100 IDVAs working in the sector, suggesting only around a third of IDVAs were still in post since Safelives started their training.

As this illustrates, the high pressures, low salaries and short-term funding mean that high staff turnover is common for support services. This also means that highly trained and experienced people are replaced with less experienced people who require the investment of training.

These pressures mean that services are struggling with workforce planning and sustainability.

Escalation of risk and compensating ineffective criminal justice measures

As explored earlier, safety is a key issue for victims of VAWG offences and victims can struggle to obtain protective orders.

Once again, where the state fails, support services step in to mitigate and services monitor risk, implement safety planning and advocate to ensure victims' safety.

Specialist domestic abuse services are often only funded to support victims deemed high risk¹⁵⁰ as it is essential these victims have support from a dedicated domestic abuse professional¹⁵¹.

Therefore, a high proportion of victims supported in multi-crime services include survivors of serious sexual violence, standard and medium risk domestic abuse and sexual harassment and non-contact abuse.

With funding cuts, there is a risk that commissioners may focus on funding support for high-risk domestic abuse. As a result, victims of domestic abuse deemed standard to medium risk may not receive support. This means an escalation of risk could go unmonitored, and violence could have been prevented.

Similarly, victims of stalking may have less access to support. Stalking is a course of conduct offence, meaning that stalking victims are reliant on police to identify a pattern of behaviour. As outlined in a police super complaint submitted by the Suzy Lamplugh Trust, in the year end March 2022, just 5% of reports of stalking resulted in a charge. This, they argue is down to policing preferring to deal with incidents in

¹⁴⁹ [*The Impacts on ISVAs and ISVA Managers of working with victims of Sexual Violence: Preliminary findings of a National Survey*](#) Kristina Massey, Miranda Horvath, Ioana Crivatu, Thistle Dalton, Hannah Rose and Kasandra Matthews (2021)

¹⁵⁰ Risk in Domestic Abuse Cases is often assessed through the [Domestic Abuse, Stalking and Honour Based Violence \(DASH\) risk assessment](#). If a victim answers 'yes' to 14 or more questions, they are considered 'High risk'. The DASH does also consider the nature of the incidents in determining whether a victim is at a high risk of harm.

¹⁵¹ [Domestic abuse response in the UK - SafeLives](#)

isolation and therefore failing to identify stalking behaviours as a course of conduct at an early stage.¹⁵² As a result, victims of stalking rely on the support from services to help them mitigate risk, but due to limited capacity and funding, less than 1% of stalking are currently supported by specialist stalking advocates¹⁵³.

In crime-types where incidents are ongoing or the victim and offender have a relationship, such as stalking and domestic abuse, there needs to be regular monitoring of risk. This is another area where support services provide life-saving support and it is important that the role of support services in preventing the escalation of risk is recognised by government.

How government should prioritise funding

Government structures which hamper progress

The NAO report¹⁵⁴ identified that there is no centralised oversight of government funding to tackle VAWG. The VAWG strategy 'sits' within the Home Office but they had no strategic oversight across other departments including understanding what other departmental spends went to initiatives to tackle VAWG.

This is a byproduct of the siloed nature of much government working and as the NAO found, a lack of a co-ordination between departments can result in different departments essentially competing to fund the same services, for example both the Ministry of Justice and Home Office competing to fund domestic and sexual abuse services¹⁵⁵.

In the wider context of departments having to make efficiency savings and competing for funds via the comprehensive spending review, this is a significant issue.

As well as the potential inefficient use of government funds, there is another issue linked to this lack of central control and that is that departments may have competing priorities which clash with the tackling VAWG agenda. For example, due to a lack of capacity in the prison estate, the MoJ recently had to release large numbers of prisoners in SDS40¹⁵⁶. Although measures were put in place to ensure that VAWG offenders were not given early release, due to the complexities of sentencing and other factors, some VAWG offenders were released under the scheme, leaving their victims confused and feeling unsafe¹⁵⁷. Similarly, the Department for Science Innovation and Technology (DSIT) has a role in preventing online VAWG but is also driving forward the government's growth in artificial intelligence/ technology agenda.

¹⁵² [Super-complaint submitted on police response to stalking](#)

¹⁵³ [An Advocate for Every Victim | Suzy Lamplugh Trust](#)

¹⁵⁴ [Tackling Violence Against Women and Girls](#)

¹⁵⁵ Ibid p.20

¹⁵⁶ [Standard Determinate Sentences \(SDS40\) Tranche release data - GOV.UK](#)

¹⁵⁷ ['Does the government's early release scheme help women's safety?'](#), Lauren Crosby Medlicott (2024)

Sometimes, it is unclear how government plans to deal with potentially competing policy priorities¹⁵⁸.

More central strategic oversight will be crucial if government wants to succeed in its' target to halve VAWG.

Resourcing issues

The Ministry of Justice (MoJ) funds the majority of victim support services. That funding equates to approximately 1% of the total departmental budget. The MoJ also funds the courts, legal aid, prisons and probation. As an unprotected department the MoJ could face further cuts.

The cost of VAWG to society is significant. It is estimated that the health cost of a rape-related incident averages at £1,110.¹⁵⁹ Yet recent unpublished research from the Women's Budget Group has shown that support services are very low cost in comparison, each individual type of intervention costs an average of £289 per victim¹⁶⁰. Victim services provide cost-effective way holistic support to VAWG victims, and funding these services must be the priority of any VAWG strategy.

What should government prioritise?

As Victims' Commissioner I am calling for:

- Emergency funding for victim services during the courts backlog crisis.
- Centralised oversight of the VAWG strategy and spending to maximise impact.
- Ring-fenced funding for 'by and for' services.
- A review of the funding landscape and commissioning processes with a goal of ensuring processes are fair and that specialist victim support services are sustainably funded for the long-term.
- Government should provide additional funding to ensure implementation of the Victims' Code and other mitigating measures.
- Long term sustainability planning for the criminal justice system.

Emergency funding for victim services during the courts backlog crisis.

This is one of the recommendations arising from my research into the courts backlog¹⁶¹. My research clearly demonstrates the invaluable contribution of support services in keeping victims engaged in the criminal justice process and the unsustainable burden being placed upon those support services. During the Covid19 pandemic, government was able to provide emergency funding to victims' support services and the crisis in the courts is no less impactful on those support services. As it stands, we are at significant risk of services closing, which will leave

¹⁵⁸ [‘The intersection of AI and CSAM: a reflection on the UK’s Online Safety Act’](#) E. Martellozzo, Paula Bradbury (2025) & [A Tipping Point in Combating Online Harms - Tech For Good Institute](#)

¹⁵⁹ [‘The economic and social costs of crime 2 nd Edition’](#), Home Office (2018)

¹⁶⁰ [Women's Budget Group – The UK's leading feminist economics think tank](#)

¹⁶¹ [‘Justice delayed: The impact of the Crown Court backlog on victims, victim services and the criminal justice system’](#)

victims unsupported both now and, in the future. Once services are gone, we lose years of expertise and experience, that would be a devastating loss.

Centralised oversight of the VAWG strategy and spending to maximise impact.

To be successful, any strategy to tackle VAWG must have central oversight, both of strategic aims and spending. Government departments cannot be at odds with each other, which can lead to inefficiencies and competition in the allocation of funds. Any intra-departmental competing priorities should be mitigated as far as possible.

Ring-fenced funding for ‘by and for’ services.

Specialist ‘by and for’ services provide struggle in the competitive commissioning process. Government should recognise the importance of this provision by ring-fencing funding to ensure these services remain available to those that rely on them.

A review of the funding landscape and commissioning process with a goal of ensuring processes are fair and that specialist victim support services are sustainably funded for the long-term.

The commissioning landscape is complex and creates inequalities based on scale. Organisations are competing for ever decreasing funds and the commissioning process itself has a resource implication for support service providers.

Additionally, short-term funding rounds create instability in the workforce and result in additional costs to services.

The complexity of the landscape means the system is unfair and highly inefficient.

Government should review the funding and commissioning landscape to ensure that services are funded sustainably for the long term.

Government should provide additional funding to ensure implementation of the Victims’ Code and other mitigating measures.

The Victims Code and other measures, help deliver procedural justice to victims, but statutory services often fail to meet these obligations. Work is underway to monitor compliance to the Victims’ Code, but government should also consider additional funding to statutory services for delivery of procedural justice.

Long term sustainability planning for the criminal justice system.

The criminal justice system is in crisis. Government must plan and budget for the long-term sustainability of the system.

The issues in the system are complex and multi-faceted and beyond the scope of this submission but if the criminal justice system is to be a key tool in tackling VAWG, it must be robust and functioning optimally. To have the robust system required government must invest in the system.

We cannot encourage victims to engage with the criminal justice system only for that system to re-traumatise them and let them down. Victim support services are doing their best to mitigate the impacts of the system, but they are also at crisis point.

Government should address this crisis as a matter of urgency.