



Faith and
Violence against
Women and Girls
Coalition

Domestic Abuse Act 2021 Review Faith and VAWG Coalition Submission

The Faith and Violence Against Women and Girls (VAWG) Coalition is the UK's leading authority on faith literacy in VAWG. With more than 60 members spanning specialist VAWG agencies, faith-based organisations, and faith and VAWG experts, the Coalition works to build bridges between members of faith communities or faith-centred organisations and specialist services responding to violence against women and girls. This submission was written with input from our members and aims to highlight gaps in the DA Act and its implementation specifically in relation to the needs of survivors of domestic abuse from faith backgrounds.

1. Children as victims of domestic abuse

Legislating children as victims of domestic abuse in the Act was an extremely important step forward in safeguarding the most vulnerable victims in society. In addition, the statutory guidance makes clear that intersectional factors may determine their experience and should influence safeguarding responses. Although the guidance states that domestic abuse includes harmful practices such as 'honour' based abuse, forced marriage and faith-based abuse, since the implementation of the Act there has been extremely limited discussion of the risks and needs of children living in households where these types of abuse are occurring. There remains little understanding of the impact of harmful practices on children, contributed to by a lack of data and evidence base. In practice children who are experiencing these types of abuse are still not being recognised as victims.

Children and young people experiencing forms of abuse such as 'witchcraft', 'evil spirits' or conversion therapy may experience physical, emotional and spiritual harm and coercive control. The framing of these types of abuse may mean that mental health

impacts are obscured. In addition, they may experience religious 'solutions' to their behavioural responses to the abuse from faith leaders and family members, instead of therapeutic or mental health support. In many cases there will be a form of 'dual abuse' i.e. with the aim to abuse both the child and the non-abusing parent. For example, children being told that they are cursed whilst blaming the mother for the 'possession' of the child. Children in this situation are often also coerced into 'policing' or abusing the non-abusive parent, causing fractures in the relationship with their mother, complex loyalty conflicts and long-term trauma.

Children living in households where this is normalised may be less likely to identify this as abuse or know when to seek help. They may also feel unable to ask for support if they are experiencing a 'double harm' of abuse within the household, and racism, Islamophobia or anti-faith sentiment outside of the home, in their immediate environment and in wider society. This can undermine their sense of self, belonging and mental health, and can increase vulnerability to grooming and extremist or harmful influences. This is compounded by the lack of faith literate safeguarding in faith schools and places of worship, and in mainstream school and youth settings. Services continue to avoid asking about faith and race for fear of being perceived as racist, leading to safeguarding blind spots.

Our members have also raised concerns that whilst the Act recognises children as victims, commissioning remains heavily skewed towards accommodation-based services, and therefore large numbers of children in the community receive no specialist support. This lack of support for children was evidenced in the Domestic Abuse Commissioners' report 'Patchwork of Provision' which found that only 29% of victim-survivors were able to access support for children^[1].

We would suggest making it explicit in the guidance that children subject to all forms of domestic abuse, including harmful practices, are victims, therefore supporting them to be recognised as requiring safeguarding. We would also like to see the implementation of training by specialist providers across all services who work with children and families, including social services, education and health visiting as well as in faith settings, to increase their ability to identify, risk assess and safeguard children experiencing these types of abuse. More broadly, there is a need for specialist support to be rolled out to children living in community settings who are subject to domestic abuse.

2. Statutory definition of domestic abuse

The definition of domestic abuse in the Act fails to address spiritual or faith-based abuse. It is therefore not clear to frontline practitioners that these are forms of domestic abuse, which can negatively influence their risk assessment and safeguarding. It can also limit the understanding of the need for commissioning and training in this area. Crucially, this can impact on victim - survivors' ability to recognise and name their experience as abuse, limiting their access to support.

We would suggest that spiritual or faith-based abuse, alongside other forms of harmful practices are named in the Act. We would also like to see the guidance more explicitly name faith-based abuse as a form of coercive control. These changes would support professionals to have a greater understanding that religion can be a vector of coercive control, not just a “cultural” background detail. This in turn would support improved risk assessments and safety planning. It would also support survivors to have a language to be able to identify and disclose the abuse they are experiencing.

3. Local authorities, statutory bodies and agencies, and multi-agency working

Evidence from our members shows that there continues to be a lack of understanding of domestic abuse within statutory services, including police and local authority housing services. This includes a disproportionate focus on physical abuse, even though coercive control and psychological abuse can have severe consequences for victim - survivors. There is also a lack of understanding of the trauma that victim- survivors present with, which in many cases will be a result of intersecting traumas, for example including exposure to racism. Services regularly fail to comprehend the specific needs of survivors from faith backgrounds, for example understanding spiritual abuse or the need to continue to be able to access support from faith communities and institutions after leaving the abuser. This can create barriers to women of faith who are fleeing domestic abuse and require access to safe accommodation.

The structures of the domestic abuse and VAWG sector including IDVA services, MARAC and risk assessment are ineffective for many women with intersecting experiences based on their race, faith, class, age, sexuality and disability. Whilst the statutory guidance notes the requirement for victims needs to be embedded in a multi-agency response, survivors from faith backgrounds are rarely considered when local co-ordinated community responses are designed. Minoritised, migrant and survivors from faith backgrounds often face multiple barriers to accessing mainstream services, including a lack of cultural competency and faith literacy in the responses they receive. Research from our members highlights that women from faith backgrounds may avoid seeking help if they believe that services will misunderstand or stigmatise their faith, culture or immigration services. This underscores the importance of culturally competent and faith-aware responses within statutory services.

Research by the Coaction Hub has shown that MARACs, designed to support the highest risk survivors, are less effective for women experiencing harmful practices, including faith related abuse^[iii]. Statutory agencies were singled out for their lack of understanding of these forms of abuse, with concerns being raised whether victim – survivors of harmful practices are being adequately safeguarded.

A further concern is the absence of faith leaders in multi-agency spaces, despite research indicating that victim – survivors approach faith leaders before other services (Kanyererdzi & Wilson 2023)^[iiii]. Faith leaders may hold crucial information on the victim – survivor and/ or the perpetrator which could be vital to risk management as well as

provide context about faith dynamics. Faith leaders require training and support to respond appropriately to disclosures and understand safeguarding and multi-agency processes.

The barriers to women of faith also need to be addressed on Domestic Abuse Related Death Review (DARDR, formerly DHR) panels. Of the 647 reviews currently on the Home Office repository, 521 (80.5%) cases show the religion of the victim was not known or not stated, with similar figures for the perpetrator (83%). These figures indicate that either services are not asking victims about their faith related needs, or that DARDR panels do not see faith as an important part of their review. This is concerning given that the purpose of DARDRs is to learn lessons following a domestic homicide, or suicide, including exploring the victim's protected characteristics.

Current risk assessment tools, including the DASH RIC and the DARA do not adequately address the risks and needs of minoritised, marginalised women and survivors from faith backgrounds. Faith can be both a protective factor for victim – survivors and can be weaponised against them to control and harm through spiritual abuse. However, this is not captured in current risk assessment tools and guidance. Given that many women will not recognise their experiences as abusive, there is a requirement for agencies to be able to name these forms of abuse, with risk assessment as one mechanism to do so.

5. Policing and courts

The police continue to have limited knowledge of harmful practices, including of spiritual abuse/ faith-based abuse. In some cases, harmful practices such as 'honour' based abuse are identified in order to 'flag' domestic abuse cases, as opposed to being pursued as forms of coercive control under the Serious Crime Act (2015). We would suggest greater provision for training for police officers, utilising specialist 'by and for' agencies who have expertise in this area.

6. Community service providers

Our members have described a landscape where many community organisations have lost funding, closed, or reduced services due to the inability to manage repeated funding cuts and delays. In some cases, these organisations are forced to be reliant on reserves or contingency funding due to slow commissioning decisions, leaving them in precarious positions. Smaller, specialist Black and minoritised and faith-based organisations are repeatedly sidelined in favour of larger, generic providers, despite evidence from the Domestic Abuse Commissioner that Black and minoritised victim - survivors prefer to access 'by and for' services^[iv]. Faith based VAWG services are explicitly or implicitly excluded from local commissioning frameworks, despite their unique trust, access and credibility with faith communities. At the same time cuts to legal aid and statutory services have meant that community services are expected to be increasingly responsible for taking on more work, bridging language, cultural and faith gaps without corresponding funding. This is taking place in the context of services

working with women with increasingly complex needs, such as having no recourse to public funds (NRPF), or negotiating issues around religious marriages.

We would like to see funding being made available to faith literate services and faith institutions to support survivors. As acknowledged in the statutory guidance, victims from faith backgrounds may face additional barriers to reporting and accessing support. Evidence from our members and other specialist organisations consistently demonstrates that culturally competent, faith literate, community-based services improve access to support for survivors facing multiple barriers.

7. Prevention

Current prevention work in England and Wales is patchy, with insufficient early intervention work, and that which exists is often short-term project based. There is limited investment in schools-based youth work which addresses domestic abuse, gender, faith and racism together. There is also a lack of early intervention with families before harm escalates to physical violence. This type of work is especially under-resourced for children and young people in minoritised communities, and there is a failure to understand their context, which may include faith and race barriers, as well as exposure to misogyny, far right and 'mansosphere' narratives.

Research and survivor testimony indicate that trusted community figures, including clergy and faith leaders, are often approached before statutory services, particularly where family honour, immigration status, or community stigma are factors. Women of faith face numerous barriers to accessing mainstream domestic abuse services, including fear that they will not understand their experiences, so positive responses are critically important.

However, there are currently no consistent or standardised safeguarding practices across faith institutions in relation to domestic abuse and violence against women and girls. Many faith leaders lack information about, and access to, formal referral pathways to specialist services and there is limited national guidance or structured training to support safe responses. Faith actors are not recognised as part of the frontline safeguarding landscape, meaning opportunities for early identification and early intervention are often missed.

Research highlights that when faith institutions work in partnership with specialist organisations, they can support both community education and improved safeguarding responses (Jewish Women's Aid; Restored UK). However, without structured engagement and accountability frameworks, these opportunities remain under-developed.

Faith institutions play a significant role in shaping social norms and values across communities and generations. Faith communities therefore represent an important yet under-utilised opportunity for prevention. Evidence from our co-founding partner Jewish Women's Aid, and community-based prevention initiatives suggest that faith

settings can play a constructive role in challenging misogyny, promoting gender equality, and supporting healthy relationships education when engagement is structured and survivor-centred. This is particularly important for young men and boys, many of whom are exposed to harmful and misogynist influences on and offline

Faith communities can also act as sites of accountability and cultural change, helping to address harmful practices (including female genital mutilation, forced marriage, so called 'honour-based' abuse etc) and support survivor-centred responses. As the Crime and Policing Bill introduces a statutory definition of 'honour' based abuse, faith leaders have a key role to play in addressing this form of abuse alongside other harmful practices such as spiritual abuse.

Beyond faith leaders and communities, we would like to see more education and specialist training for services on harmful practices, including 'honour' based abuse, forced marriage and spiritual abuse. Public knowledge of these forms of abuse is very limited, and societal and media narratives, such as locating them solely in Asian communities, restricts understanding and identification. We would like to see training for professionals such as teachers, social workers and health professionals on faith competent safeguarding.

Finally, there is a need for perpetrator work to move beyond the current focus on high harm abusers to incorporate early intervention programmes, programmes which address gender, faith and culture, and a wider range of perpetrators including family members and in laws.

8. Inclusion

Although the statutory guidance states that *'Specialist services should seek to understand the varying manifestations of domestic abuse relating to faith and how a mix of culture, religious tradition and holy scripture can be used as tools of abuse by perpetrators'* we have seen limited evidence of this in practice. Faith is consistently being ignored as a significant factor in risk assessment, safety planning and strengths-based practice. It is also not being addressed in commissioning, education and training. This leads to victim - survivors receiving generic responses, and the misunderstanding of risk factors and the centrality of their beliefs and communities.

There is a lack of understanding of the intersecting barriers that many women of faith experience, including racism, migration status and negotiating NRPF. These women experience both invisibility when support and resources are allocated whilst being made hyper visible when faith and culture are blamed for abuse. At the same time, they may fear being 'othered' within their own communities if they speak openly or engage with statutory agencies around the abuse. This may be exacerbated for LGBT+ survivors.

The Act has not addressed the systemic exclusion of migrant women with NRPF from protection and support. Our members have advised that victim - survivors with NRPF

are forced to continually move between local authorities, helplines and community services, often being given incorrect and inconsistent information and advice. Cuts to legal aid have also meant that many women struggle to access immigration advice within time limits. In addition, the proposed 'earned settlement' scheme risks deepening gaps for migrant women, increasing insecurity, deterring help seeking and reinforcing dependency on perpetrators.

Finally, we have been informed by several of our members that in areas which now have right wing led councils there is a contradiction between the intended aims of the DA Act and the VAWG Strategy and local policy. For example, services being directed to remove references to diversity from their website, and concern that discussing diversity in tenders will count against them. There is unease in these areas that resources for domestic abuse will be further directed away from specialist agencies that work with racially minoritised and faith-based communities. There has also been an issue raised of these councils requesting information on the ethnicity of perpetrators, not for monitoring or improving services but to be used as a part of an anti-immigrant agenda. There is increasing concern that victim - survivors of domestic abuse are at risk of being used within culture war narratives whilst having decreased access to support.

10. Gaps

Despite religion being a protected characteristic, and faith named in the guidance as both a potential source of support to victims, and a mechanism for abuse, it continues to be sidelined in policy and practice. Faith needs to be clearly named and embedded in risk tools, data collection, training and commissioning. Psychological and spiritual harm alongside faith based coercive control are under recognised both as forms of abuse and as causes of long-term trauma and mental health issues. Failure to recognise this leads to missed opportunities for early intervention, and miscalculation of risk. The lack of focus on this means that we have limited data and evidence on the prevalence and patterns of faith-based abuse.

^[i] DAC (2022) A Patchwork of Provision. Available at: <https://www.gov.uk/government/publications/a-patchwork-of-provision-mapping-report>

^[ii] Coaction Hub (2024) Are MARACs Effective for Harmful Practices Cases? Available at: https://content.webfactorysite.co.uk/7982-3-marac_and_harmful_practices_report_final.pdf

^[iii] Kanyererdzi & Wilson (2023) Spirit and Solace: Black Churches and Domestic Abuse

[s://www.gov.uk/government/publications/a-patchwork-of-provision-mapping-report](https://www.gov.uk/government/publications/a-patchwork-of-provision-mapping-report) hub^[iv] DAC (2022) A Patchwork of Provision. Available at: <http>.

