

Submitted to Prevention of Domestic Abuse (Scotland) Bill  
Submitted on 2025-09-15 19:05:39

## About you

1 Please read the privacy notice below and tick the box below to show that you understand how the data you provide will be used as set out in the policy.

I have read and understood how the personal data I provide will be used.

2 How your response will be published

I would like my response to be published in its entirety

3 What is your name?

Name:  
Susan Smith

4 What is your email address?

Email:  
info@forwomen.scot

5 Are you responding as an individual or on behalf of an organisation?

Organisation

## Organisation details

1 Name of organisation

Name of organisation:  
For Women Scotland

2 Information about your organisation

Please add information about your organisation in the box below:

For Women Scotland is a not-for-profit grassroots group campaigning to protect and strengthen women's rights in Scotland.

## 1. Notification requirements and monitoring of Domestic Abuse Offenders

1.1 What are your views on this proposal?

Please use this textbox to provide your answer:

We are supportive of the intention to record and monitor domestic abusers.

It may be worth exploring what support could be given to agencies to ensure that the offender complies with the requirement to register and to detect instances of failure.

Hundreds of sex offenders have been reported as going missing having failed to notify the police of required changes. It would be useful to learn the lessons of this and ensure that reporting and follow up were tightly monitored.  
<https://www.bbc.co.uk/news/uk-64624921>

1.2 Is the definition of a domestic abuse offender in Part 1 of the Bill the right one?

Please use this textbox to provide your answer:

This is a solid definition covering those convicted of domestic abuse. Sadly, domestic violence is under-reported although many perpetrators will be known to the police, social work, and VAW organisations. It is difficult to think these individuals could be brought into the scope of this Bill without trespassing on the presumption of innocence. However, if this information is being shared by parties including the police, there may be scope for a flexible approach which allows recording of high risk individuals without entering them on the full register.

1.3 Do you think these notification and monitoring requirements would help improve safety for victim-survivors?

Please provide your response in the box provided.:

There should be scope for sharing information with victim-survivors, especially regarding relocation of the offender.

The register removes the onus on reporting to the domestic abuse disclosure scheme from the victim-survivor which is a considerable improvement.

Scotland's Multi-Agency Public Protection Arrangements (MAPPA), allow information about registered sex offenders to be shared with third parties as necessary. Notification requirements proposed in the Bill should also ensure that the public, victims and potential victims are protected through disclosure mechanisms.

MAPPA also allows for surveillance and electronic tagging, curfews and civil orders and the National Accommodation Strategy for Sex Offenders (NASSO) which covers housing arrangements. Similar arrangements should be considered for domestic abusers.

#### 1.4 Are there any risks or unintended consequences that you think need to be considered?

Please use this textbox to provide your answer:

The register should not be seen as a panacea. As above, not all abusers will be captured on the register, so agencies need to continue to monitor and record those who have not been convicted.

#### 1.5 Do you think there is other information that domestic abuse offenders should be required to notify the police of that isn't included in the Bill?

Please use this textbox to provide your answer:

The information is comprehensive. There may be occasions when the workplace of the perpetrator is important, especially if it is in proximity to the survivor-victim or family members or if there are safeguarding concerns. This would not apply in all cases, however, and it may represent a breach of privacy in such instances.

We would like to see moves to prevent sex offenders changing their names and this should apply to domestic abusers as well.

<https://www.scottishlegal.com/articles/five-hundred-sex-offenders-change-their-name-in-two-years>

#### 1.6 Do you agree with the notification periods included in the Bill or should these be different?

Please use this textbox to provide your answer:

Individuals convicted of sexual offences under the Sexual Offences Act 2003 have 10-year notification period for custodial sentences between six and 30 months and seven years for sentences below 6 months.

The average custodial sentence for domestic abuse offences in Scotland reached 611 days (20 months) in 2022-23. This would translate to 5 years on the register under the Bill which is half the length of time a sex offender would be bound by the requirement to register.

We would also like to see the possibility for extending the period for individuals who are assessed to pose an ongoing risk of reoffending.

#### 1.7 Do you agree with the penalties for failing to comply with the notification requirements?

Please use this textbox to provide your answer:

Yes. It would be useful to know what powers and ability the police will have to follow up on those who fail to comply.

## 2. Risk Notifications

#### 2.1 Do you think the provisions in the Bill will mean that more disclosures will be made under this scheme?

Please use this textbox to provide your answer:

Moving the requirement to disclose from the victim-survivor to the perpetrator and linking it to conviction should ensure that more disclosures are made.

#### 2.2 Could the Bill do more in terms of enabling the disclosure of someone's history of domestic abuse?

Please use this textbox to provide your answer:

Information should be shared with third parties where necessary.

## 3. Rehabilitation and Behaviour Change Programmes

#### 3.1 What are your views on this proposal?

Please use this textbox to provide your answer:

Programmes to support rehabilitation and behaviour change are an important part of reducing reoffending. Being willing to go on to a course should not be a factor in reducing the length of time an offender is on the register.

### 3.2 Can these types of programmes be effective in reducing harm?

Please use this textbox to provide your answer:

The effectiveness of these programmes varies considerably according to the methodology, for example, an evaluation of the Duluth Model that was conducted in two cities in the USA found this intervention largely ineffective while CBT-based approaches indicated reduced violence and recidivism.

In Scotland, the Caledonian system has shown evidence of reducing harm, with a 2016 independent review finding men felt better able to de-escalate or remove themselves from situations that might lead to arguments. They also reported better communication and improved communication while women reported feeling safer and more supported

The problem is, it is only available in 20 of 32 local authorities and is under-resourced.

<https://www.gov.scot/publications/caledonian-system-evaluation-analysis-programme-tackling-domestic-abuse-scotland/pages/7/>

### 3.3 What kinds of support or follow-up are needed to make them meaningful?

Please use this textbox to provide your answer:

Improved monitoring and scrutiny of the programmes and a roll out to areas which are not covered.

Currently reoffending rates are not recorded and there needs to be better data collection. While the above report outlines a measure of success for the Caledonian system, it must be properly quantified.

### 3.4 Are there currently enough programmes and services in place that if someone is assessed as suitable that they could be provided?

Please use this textbox to provide your answer:

No, see above.

## 4. Data collection and reporting

### 4.1 Do you support this proposal?

Please use this textbox to provide your answer:

Strengthening data collection is critical, especially to ensure appropriate and adequate services are funded. Currently, there is limited information on intersections between characteristics such as race, disability and domestic violence. A better understanding of the victim-survivor profiles would help to target resources. Similarly, there needs to be better data on offenders so that targeted interventions can be deployed to prevent violence.

### 4.2 Is the data the Bill requires to be collected the right information that is needed?

Please use this textbox to provide your answer:

These are key areas and information will be helpful in understanding risk factors. The Bill could go further and collect data on other protected characteristics. This would be critical in establishing where services are needed. In the absence of such information, lobby groups who do not collect data in a systematic fashion have been able to use self-selecting surveys to suggest certain demographics are at increased risk of violence and use that to inform funding demands. For example, the 2010 paper Out of sight, out of mind – Transgender People's Experiences of Domestic Abuse has been used to support the ludicrous claim that 80% of trans people suffer domestic violence. Despite repeated debunkings, this has been used by otherwise reputable organisations and cited in evidence to Westminster and Holyrood. Misinformation about domestic abuse is unhelpful for everyone, especially if vital resources are redeployed. Thorough data collection would mitigate this.

<https://forwomen.scot/14/10/2024/abused-or-abuser/>

Cultural assumptions around violence may be shaped by ethnicity, but religion also plays a part. Some research suggests that abuse may be hidden in churches while women from a non-religious background are more likely to report domestic violence. Responses by Faith leaders to reports of DV adds a level of complexity.

<https://pure.coventry.ac.uk/ws/portalfiles/portal/43691994/Binder2.pdf>

<https://academic.oup.com/ojlr/article/12/2/178/7225338>

Pregnant women also are reported to be at heightened risk of DV and data on this cohort would also be important.

<https://www.nhs.uk/pregnancy/support/domestic-abuse-in-pregnancy/#:~:text=People%20who%20are%20pregnant%20are,or%20death%20to%20the%20baby.>

### 4.3 How could this help improve support for victim-survivors?

Please use this textbox to provide your answer:

Better, targeted, holistic support.

## 5. Domestic Abuse Education in Schools

### 5.1 What are your views on this proposal?

Please use this textbox to provide your answer:

We welcome this proposal - education is key to informing attitudes. Worryingly, we are aware that abuse and coercive relationships are affecting school age children. Angus Women's Aid has reported that in the first five months of 2025, they dealt with five girls under 16 who reported serious abuse at the hands of their partner and 38 aged 16-18.

<https://www.thetimes.com/uk/scotland/article/jk-rowling-beiras-place-edinburgh-conference-75rmxw68c>

Children are increasingly exposed to sexist or violent messages online from "influencers" like Andrew Tate and are easily able to access porn.

In March and April Angus Women's Aid surveyed 110 14-17 year olds .10% of the boys admitted physically abusing their partner, 16% hacked their social media accounts, and 6% said they would pressurise a partner to send them images or videos. Their motivations included getting what they wanted, humiliating the girl or hurting them.

23% of the girls said they had been forced by their partner into unwanted sexual contact.

There will need to be a substantial funding requirement and the education must be delivered by properly trained trauma-informed educators. A partial implementation or delivery could be counter productive. There is likely to be a need for specialist third sector organisations.

### 5.2 At what age should this education begin?

Please use this textbox to provide your answer:

Angus Women's Aid reported that they were being asked to talk to primary school children aged 9-10 as boys were making sexist, controlling comments to girls. Education on healthy relationships should start in early Primary before the children are exposed to online influences.

### 5.3 What topics should be covered to make it meaningful and inclusive?

Please use this textbox to provide your answer:

Children should be taught to recognise controlling or abusive behaviour and sexist attitudes which often underpin it. These would include, but are not limited to, victim blaming and downplaying or minimising abuse.

It is important, however, that boys are encouraged to be part of the solution and are not made to feel as though they are an inevitable problem.

The damage done by social media and online harms like pornography must also be addressed.

### 5.4 How can we ensure this is delivered in a way that is safe and appropriate for all pupils?

Please use this textbox to provide your answer:

Specialist training for teachers and support from third sector organisations will be key.

Teachers must also be trained to respond in the event that a child then discloses abuse

## 6. Support for Victim-Survivors and their Families

### 6.1 Do you think this Bill goes far enough in addressing the needs of people affected by domestic abuse?

Please use this textbox to provide your answer:

The Bill could do more to balance the needs of the survivors, especially with an improved notification system of changes to the perpetrator's details.

The Bill should, ideally, stand alongside improved measures for victim support especially finance, housing, legal support, and counselling which are all critical in enabling women to leave abusive relationships.

### 6.2 What else could be included to strengthen support for victim-survivors, children and families?

Please use this textbox to provide your answer:

## 7. Concerns About Privacy, Policing or Human Rights

### 7.1 Do you have any concerns about the human rights or equality implications of the Bill?

Please use this textbox to provide your answer:

No

7.2 Are there groups of people who might be affected in ways that should be carefully considered (e.g. racialised communities, disabled people, LGBTQ+ people)?

Please use this textbox to provide your answer:

## 8. Practical Considerations and Resources

8.1 Do you have any views on the practical challenges or resource implications of this Bill?

Please use this textbox to provide your answer:

There will be a cost to providing adequate rehabilitation programmes and education training. Without this investment, however, the practical impact of the Bill will be substantially reduced.

8.2 Are there specific areas (e.g. rural policing, schools, the third sector) where support would be especially needed?

Please use this textbox to provide your answer:

It will be important to work with local women's organisations to understand the challenges in different communities. For example, isolation in rural communities can make women vulnerable and they might fear the impact on relationships in the community from reporting.

## 9. Anything Else

9.1 Do you have any other comments or concerns about the proposals in this Bill that haven't already been covered?

Please use this textbox to provide your answer:

We hope that the government also moves on the commitment to list sex as a protected category in Hate Crime. Training and resources for the police will be beneficial in informing approaches.