



**Comments submitted by the United Kingdom
on GREVIO's final report on the implementation
of the Council of Europe Convention
on preventing and combating violence
against women and domestic violence
(Baseline Report)**

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Comments by the United Kingdom to GREVIO's baseline evaluation report

His Majesty's Government of the United Kingdom of Great Britain and Northern Ireland ("The UK government"), the Northern Ireland Executive and the governments of Scotland and Wales would like to thank the Council of Europe's Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) for their baseline evaluation report on legislative and other measures giving effect to the provisions of the Convention on Preventing and Combating Violence Against Women and Domestic Violence ("the Istanbul Convention").

The UK Government is grateful to GREVIO for its efforts throughout the evaluation process and welcomes GREVIO's feedback regarding its compliance with the Istanbul Convention and its first observations as to how the UK's response to violence against women and girls can be refined. In particular, the UK Government and each of the devolved governments in Wales, Scotland and Northern Ireland are grateful for GREVIO's extensive engagement with stakeholders working across devolved and reserved policy matters in the nations.

The UK Government recognises that the scale of violence against women and girls (VAWG) in the UK is intolerable and that tackling these crimes must be a top priority.

GREVIO highlighted several positives within the evaluation report. These include:

- the implementation of criminal law provisions such as non-fatal strangulation and controlling or coercive behaviour;
- the introduction of the Online Safety Act 2024 which addresses tech-facilitated violence against women and girls;
- the introduction of the Domestic Abuse (Scotland) Act 2018 and the Domestic Abuse Act 2021 in England and Wales which expanded the definition of domestic abuse to include emotional and economic abuse as well as introducing new criminal provisions; and
- the specialist support available across the UK for women from minority groups.

The UK Government acknowledges the recommendations made by GREVIO and recognises that there are areas for improvement, including:

- ensuring sustainable and long-term financial resources are available for the implementation of policies and legislation across all four nations;
- ensuring sustainable resources are available for specialist women's rights organisations to provide services for women affected by violence and abuse;

- ensuring that children under the age of 16 are included in our response to VAWG and receive an effective safeguarding response when they experience teenage relationship abuse; and
- ensuring more comprehensive and richer data is collected about VAWG crimes and the individuals who commit and experience them.

Devolution

The UK constitution is underpinned by three devolution settlements, one each for Scotland, Wales, and Northern Ireland. These settlements stipulate the matters that are the responsibility of the UK Parliament, and those that are the responsibility of the three devolved legislatures. Where matters are devolved it is possible for there to be different approaches across the nations of the UK.

It is one of the strengths of devolution that approaches can be tailored to the specific needs of each nation. That said, the four governments of the UK work together to ensure a coherent and effective framework for the safety and security of the people of the UK.

The UK Government and the devolved governments note that GREVIO has made a number of recommendations impacting matters that are devolved to Scotland, Wales, and Northern Ireland.

Health, housing, and education are devolved to Northern Ireland, Scotland, and Wales. Crime and criminal justice are devolved to Scotland and Northern Ireland. Whilst the governments of all four nations welcome GREVIO's recommendations, it is noted that some of the recommendations do not fully account for the devolved structure of the UK. An example that highlights this is GREVIO's recommendation for the UK to implement a state-wide helpline to be the single first point of contact for victims of VAWG crimes seeking support. It is important to note that service delivery necessarily varies according to the different approaches to these devolved matters. A state-wide helpline would not necessarily reflect those important differences and the variation in service delivery that results from them.

Each devolved government within the UK already operates a dedicated 24/7 helpline for victims of domestic abuse; England and Wales operate a 24/7 helpline for victims of sexual violence with Wales also operating a 24/7 helpline on all forms of violence against women, domestic abuse, and sexual violence for victims, concerned others and professionals. Northern Ireland operates a combined domestic and sexual abuse helpline.

Furthermore, victims have been clear that they want independent specialist and 'by and for' provision, including from helplines, which can support their specific needs. Each government will strive to make available high-quality and accessible services to support victims of VAWG crimes. We will continue to commission a range of VAWG helplines to address the diverse and changing needs of victims and reflect the legislative and policy contexts within which those services operate.

UK government

The UK Government's 2024 manifesto included the ambition to halve levels of violence against women and girls in a decade - an ambitious aim that requires a transformative approach across government, public services, the private sector, and charities. Since GREVIO's evaluation visit in early 2024, the UK Government has introduced several key measures to improve protection for victims of violence against women and girls and ensure perpetrators are held accountable. These include the rollout of Domestic Abuse Protection Orders in selected areas in England and Wales and the introduction of "Raneem's Law" in the first five police forces (initially in England) to strengthen the police's response to victims of domestic abuse by embedding specialists in 999 control rooms.

In addition, on 3 December 2024 we set out a new package of six measures to tackle stalking, including conducting a review of stalking legislation and introducing statutory guidance through the Crime and Policing Bill to set out the process by which the police should release identifying information about online stalking perpetrators to victims. These measures will have effect in England and Wales when the Bill has received Royal Assent, and the relevant provisions have been commenced.

In February 2025, the Home Office announced £13.1 million funding to introduce a new National Centre for VAWG and Public Protection (NCVPP) to improve the policing response to violence against women and girls and child sexual abuse in England and Wales. Launched in April 2025, the NCVPP brings together three existing victim-orientated policing programs into one national unit to coordinate and improve consistency in the national policing response.

The UK government is also currently taking the Crime and Policing Bill through Parliament, which includes provisions to strengthen the post-conviction risk management of sexual offenders. With the consent of the Northern Ireland Assembly and Scottish Parliament, those legislative changes will have effect across the UK.

Later this year, the UK Government will publish a new violence against women and girls (VAWG) strategy which will set out the strategic direction and concrete actions to deliver on the Government's ambition to halve levels of VAWG in a decade. This will be underpinned by an evidence-based theory of change to ensure that our approach is informed by the best available evidence. The extent of the interventions in that strategy will follow the terms of the devolution settlements with the majority of activity being undertaken in England or England and Wales. However, the governments across the UK continuously work together to harmonise their approaches to tackling VAWG.

As competence for several important policy areas is devolved to Scotland, Wales and Northern Ireland, the governments in those jurisdictions have and will continue to have their own policies and strategy documents in respect of

violence against women and girls and domestic abuse. Each of those governments will comment on aspects of the report specific to their policies and practice below.

Scotland

The Scottish Government would like to thank GREVIO for their baseline evaluation document which offers insights into how the Scottish Government is complying with the obligations arising from the Council of Europe's convention on preventing and combating violence against women and domestic violence (the Istanbul Convention, hereinafter referred to as the "Convention").

The Scottish Government is pleased that Equally Safe, our national strategy for tackling Violence against Women and Girls, and the accompanying Delivery Plan has been recognised positively at many points within the report, including the actions to improve access for victim-survivors to justice services and support services for women and girls with learning disabilities. GREVIO has recognised that Equally Safe is underpinned by a distinctly gendered approach and covers many forms of VAWG, including the digital dimension. However, as a point of accuracy, the term gender-based violence (GBV) is clearly defined within the Equally Safe¹ Strategy and was developed following considerable engagement with the VAWG sector in Scotland (*definitions, page 10*).

The Scottish Government will carefully assess and the recommendations to identify which fit within current policy and which require further exploration. Where applicable, the recommendations will be discussed with external stakeholders including the violence against women non-governmental organisation (NGO) sector, an approach at the heart of Equally Safe and which the Scottish Government was commended for by GREVIO within the report. Several of the recommendations outlined in the evaluation report are currently already being implemented by the Scottish Government. The GREVIO recommendations can further inform and therefore optimise our approach. For example, our Equally Safe Delivery Plan commits to improve data in relation to VAWG and the recommendations provide a helpful steer for next steps.

The Scottish Government will undertake its response to recommendations in a way that fully reflects the devolved nature of legislation, policy and systems in Scotland. You will appreciate that not all systems can easily be aligned with other parts of the UK. In some circumstances that would clearly be inappropriate. On other areas we are in regular contact with colleagues across the UK where lessons to be learnt are shared to enhance our approaches to similar issues, legislative or otherwise. This does mean that some recommendations will be challenging to implement – for example, there is no mandatory education curriculum in Scotland though the Scottish

¹ [Equally Safe: Scotland's Strategy for Preventing and Eradicating Violence Against Women and Girls](#)

Government remains committed to ensuring schools have access to high quality information about violence against women and girls.

Throughout the report, Emergency Barring Orders are referenced and, on occasion, compare Scotland to England and Wales, where barring orders can be issued in criminal contexts. This is an example of where our justice systems do not align across the devolved administrations in the UK. Part 2 of the Domestic Abuse (Protection) (Scotland) Act 2021 provides additional powers to social landlords to apply to the court for an order to end the tenancy rights of persons who have been abusive to their partner or ex-partner. Where such an order is granted, this will have the effect of enabling the landlord to transfer a tenancy to a domestic abuse victim. We are aiming to bring Part 2 of the Act into force in December 2025. The Scottish Law Commission is also currently reviewing the civil remedies against domestic abuse and has proposed a new form of civil protection order which could include an optional component consisting of a barring order, to exclude the perpetrator from the home for a fixed period.

The Scottish Government notes GREVIO's calls for urgent action to ensure sustainable funding levels for women's rights organisations providing specialist support services for women and children victims of violence by offering appropriate and multi-annual funding, reinforcing the recognition of their expertise. This correlates with a key deliverable in the Equally Safe Delivery Plan – to develop a sustainable funding model aligned to the ambitions of Equally Safe and informed by recommendations in the Independent Review of Funding and Commissioning of VAWG Services. It is worth recognising that the Victim Centred Approach Fund now forms part of the Scottish Government Fairer Funding pilot, continuing our commitment to putting victims at the heart of the justice system and providing a multi funding year template. We appreciate the challenging circumstances organisations are working within and agree that there is a need for greater certainty around future funding and support where fiscal certainty allows, and we remain committed to achieving Fairer Funding arrangements.

Wales

The Welsh Government welcomes the GREVIO report following their visit to Wales in early 2024. We are pleased that the secretariats had the opportunity to meet with a range of stakeholders across both the devolved and reserved landscape in Wales, demonstrating our whole-system approach to tackling gender-based violence.

Welsh Government would like to take this opportunity to highlight actions that align to the recommendations of the review. Tackling violence against women, domestic abuse and sexual violence (VAWDASV) has been a long-standing priority, as demonstrated through the ground-breaking Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015². The purpose of the Act is to improve arrangements for the prevention of

² Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015

gender-based violence, domestic abuse and sexual violence, the protection of victims, and to support those affected.

The Act sets out provisions for a National VAWDASV strategy, as well as local strategies developed by partnerships between local authorities and health boards as well as invited others (including Police and Crime Commissioners and NGOs).

The Welsh Government published its second VAWDASV National Strategy for 2022 – 2026 in May 2022, which set out the vision to end violence against women and girls, domestic abuse and sexual violence in Wales. We have established the VAWDASV Blueprint approach to address gender-based violence in Wales and deliver our strategy. Although policing in Wales is not devolved and policing practice is not the direct responsibility of the Welsh Government, this approach brings together devolved and reserved public authorities, non-governmental organisations, specialist services and survivors whose voices are integral to securing a future without violence against women and girls.

In 2022, Relationships and Sexuality Education (RSE) became a statutory requirement in the Curriculum, for Wales Framework, and is mandatory for all learners, introducing a focus on developing healthy relationships from early years to ensure all children and young people have the ability to enjoy healthy, happy and respectful behaviours.

The VAWDASV National Training Framework, a statutory training framework for professionals in Wales, ensures that a wide range of professionals have access to appropriate and relevant training.

Wales aims to be the world's first 'Nation of Sanctuary'. Whilst immigration and asylum policy falls to UK Government, the Welsh Government is committed to making Wales the safest place in Europe to be a woman or a girl.

The Welsh Government looks forward to continuing to work with the UK Government and other devolved nations through a whole-system, cross-governmental approach on an important issue which encompasses both reserved and devolved areas of our public sector.

Northern Ireland

The First Minister and deputy First Minister note the GREVIO baseline report and we note that the delegation was able to meet and engage with a number of organisations and senior representatives here. The report provides an analysis of current systems, frameworks and services in place, and highlights both areas of progress and gaps. We are committed to working collaboratively across government departments, with frontline professionals, and survivor advocacy groups to ensure measurable progress on the ground.

Ending Violence Against Women and Girls is a key priority of the Programme for Government³.

We are glad that some of the key legislation and policies delivered recently have been recognised including the Domestic Abuse and Civil Proceedings Act 2021 and the Strategic Framework to End Violence Against Women and Girls. A joint Serious Sexual Offences Strategy between the Police Service of Northern Ireland and the Public Prosecution Service is under development and should launch in 2025. Work is being undertaken on the Social Inclusion Strategies; this involves a phased approach, with work having commenced on the Anti-Poverty and Disability Strategies and a timetable for the Gender Equality Strategy being developed.

We note that Section 75 of the Northern Ireland Act 1998 places a duty on public authorities, in carrying out their functions, to have due regard to the need to promote equality of opportunity among nine categories; one of which is between men and women generally. There are of course other legislative provisions prohibiting discrimination in particular areas, including sex discrimination.

We note the recommendation relating to Magdalene Laundries and similar institutions. The Victim and Survivor Service provides a comprehensive package of support to those affected and, following a public consultation⁴, further enhancements to that package are being made.

Victims and witnesses have access to the joint police/Public Prosecution Service (PPS) Victim Witness Care Unit (VWCU). The Victim and Witness Charters set entitlements and services that victims of crime here can expect to receive from a range of service providers.

We have the Public Protection Arrangements here (PPANI), rather than MAPPA. These arrangements bring together a number of agencies including the Police Service, Prison Service, Probation Board, NI Housing Executive and Health and Social Care Trusts to work together to share information, carry out a risk assessment of risk and, where applicable, agree a comprehensive risk management plan.

Ministers note GREVIO's calls for urgent action to ensure sustainable funding levels for women's rights organisations providing specialist support services for women and children victims of violence by offering appropriate and multi-annual funding, reinforcing the recognition of their expertise. While difficult decisions have been required due to the tough budgetary situation, the Executive has sought to protect frontline services. We will consider the recommendations within the report.

³ [Programme for Government 2024-2027 'Our Plan: Doing What Matters Most' - Documents | The Northern Ireland Executive](#).

⁴ [Truth Recovery – Public Consultation on a statutory Public Inquiry and Financial Redress Scheme | The Executive Office](#) and [Truth Recovery – Public Consultation on a statutory Public Inquiry and Financial Redress Scheme – Consultation Report | The Executive Office](#)

The UK Government, the Northern Ireland Executive and the governments of Scotland and Wales would once again like to thank GREVIO for its baseline evaluation report. The governments of all four nations remain committed to tackling violence against women and girls in all its forms and look forward to continued collaboration with GREVIO and the Council of Europe.

**Home Office
June 2025**