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6th August 2020

Mr Ed Humpherson
Director General for Regulation
Office for Statistics Regulation
c/o UK Statistics Authority
1 Drummond Gate
London
SW1V 2QQ

Dear Mr Humpherson

Re: Draft Statutory Guidance Framework (July 2020) – Domestic Abuse Act/Bill

I am writing on behalf of the ManKind Initiative, the expert, specialist and leading UK charity supporting male victims of domestic abuse. This is in regard to the above document published in July 2020 which is the Statutory Guidance to be used to enact the legislation in the Domestic Abuse Act when it gains Royal Assent.

We are writing to complain at the use of the word “**vast**” by the Home Office when describing the relative numbers of female and male victims of domestic abuse and are requesting that the UK Statistics Authority instruct the Home Office to remove this word.

This word appears twice:

Paragraph 23 (Page 8): “Domestic abuse most commonly takes place in intimate partner relationships. The **vast** majority is perpetrated by men against women, but men are also subject to abuse by female partners, and both men and women experience abuse from same sex partners.”

Paragraph 61 (Page 18): “Whilst the statutory definition of domestic abuse is gender-neutral, we recognise that more women than men are affected by domestic abuse. Statistics from the last ONS bulletin showed that in the year ending March 2019 women were around twice as likely to have experienced domestic abuse as men. Research also suggests that when controlling or coercive behaviour is taken into account, the differences between the experiences of male and female victims becomes more apparent, with the **vast** majority of victims being women.”

The charity is requesting this word is removed because the statistics do not justify the usage of the word “vast” as meant by common dictionary definitions to be “extremely large” or “extremely big”. Therefore this word should not appear in Statutory Guidance in this context because it does not comply with the Code of Practice governed by the Office for Statistics Regulation.

The charity agrees with the Government position set out in Paragraph 61 that more women are affected by domestic abuse and that the majority of domestic abuse is carried out by men.

We would therefore agree with a statement that stated “the majority of victims are women” but the use of the word “vast” suggests a greater difference than the official statistics bear. This gives an

inaccurate picture of the gender of victims of domestic abuse victims and therefore is not acting in the Public Good – a key component in the Code of Practice.

The usage of this word would have a detrimental effect on the users of the Statutory Guidance (agencies, governments, charities, employers and the public) and ultimately male and LGBT+ victims. This is because it would have the harmful effect of minimising recognition and paint an inaccurate impression of the comparative numbers of these victims compared to female victims. This would have a negative impact on service provision, responses to disclosure and reinforce barriers that these victims face especially on the societal narrative that only women are victims.

Statistics or statistical description in Statutory Guidance should only be used if produced and/or tested for objective accuracy by the Office for National Statistics.

There are two areas of concern

(1) Paragraph 23: “The **vast** majority is perpetrated by men against women”:

One of the key challenges with the main ONS Crime Survey for England and Wales¹ is the lack of statistics on the gender of who is perpetrating against whom. This is being asked for by a range of academics and organisations. Until there are official statistics on this the gender split, it is inaccurate for the Government to produce a statement with the phrase “vast” this statement without empirical evidence.

(2) Paragraph 61 (Page 18):

The research² in Paragraph 61 which is used to justify the term “vast” is not justifiable for a number of reasons.

It was produced in 2015 before the new law on coercive/controlling behaviour (Serious Crime Act 2015) was introduced. In addition, the definitions of coercive/controlling behaviour used in the research are not aligned to the legal³ and government definition⁴ and exclude the full range of defined behaviours. As well as not being publicly available (only through academic subscriptions) and not taking into account research by other academics, its findings are not aligned to that produced by the ONS itself:

For instance:

- Research that was produced by the ONS entitled “Developing a measure of controlling or coercive behaviour” in 2019⁵ showed that when assessing the gender split for victims of this crime the ratio was broadly for two female victims there was one male victim. This is exactly the same as in the main Crime Survey for England and Wales which the Home Office bases its domestic abuse policy on. Other research also shows it could be closer to parity⁶.
- The behaviours that can be identified through the main Crime Survey for England and Wales as being typical coercive and controlling behaviours (threats, force, emotional and financial

¹ ONS: [Domestic abuse prevalence and victim characteristics, England and Wales: year ending March 2019](#)

² Myhill, [Measuring Coercive Control](#), (2015)

³ CPS, [Controlling or Coercive Behaviour in an Intimate or Family Relationship](#) (2017)

⁴ Home Office, [Controlling or Coercive Behaviour in an Intimate or Family Relationship](#) (2015)

⁵ ONS: [Developing a measure of controlling or coercive behaviour](#) (2019)

⁶ IBB Solicitors, [Making Legislation Work More Effectively for Victims](#) (2019)

control) also show broadly the same 2:1 ratio. This is from the statistics covering the prevalence of domestic abuse⁷ and also partner abuse⁸

The final and most telling point on this research is that it states itself (page 17): “*Our findings, therefore, should not be generalized to the population of victims in England and Wales.*”

It is of serious concern therefore that the Government is using research in the Statutory Guidance for the population of England and Wales to justify the use of a very important term (vast), when the research itself says its findings should not be applied in this way.

Conclusion

On the basis of the arguments above, the charity is therefore requesting that you to enforce the Code of Practice on Statistics with regard to this Statutory Guidance on the basis above to ensure that it accurately reflects and describe the gender ratios of victims of this terrible crime.

It is important to be clear that the charity takes an inclusive and 21st century view of domestic abuse that seeks to ensure all victims of domestic abuse, female and male alike, receive the recognition and support they need.

Thank you for your time and consideration, and we look forward to receiving your reply.

Please do not hesitate to contact me if you require any further information.

Yours sincerely

Mark Brooks

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⁷ ONS: [Domestic abuse prevalence and victim characteristics, England and Wales: year ending March 2019](#) (particular tables 1a-1b)

⁸ ONS: [Partner abuse in detail, year ending March 2018](#) (particularly table 9)