

Prevention of Domestic Abuse Bill

Collective response to consultation

15th September 2025



Organisation Name

Corra Foundation

Information about your Organisation

Corra Foundation is a grant making charity based in Scotland. We work to ensure that the voices of communities across Scotland are heard, and we aim to amplify those voices where possible. Part of our approach is ensuring that the organisations we support can engage with decision making processes that affect them and the communities they support.

This is a collective response to the Criminal Justice Committee's call for views to help inform scrutiny of the Prevention of Domestic Abuse Bill introduced by Pam Gosal MSP. This response represents the views of 12 community-led organisations working to support people (primarily women and girls) affected by domestic abuse and violence. Each organisation receives funding from Corra's Henry Duncan Grants Women and Girls Fund. The organisations are:

African Women's Group Scotland
Art and Spirituality CIC
Border Women's Aid
Glendale Women's Café
Her Story Scotland CIC
Jubilee House
Milk Café
Music Broth
Mwamba
Project Esperanza
Sewing2gether All Nations
Unity Family Services

To produce this response, Corra conducted semi-structured interviews and focus groups with the organisations. Transcripts were reviewed, and this write up produced. This response was shared back with all organisations for comment before being submitted to the Committee via Citizen Space.

We know that there are important and valuable insights on the intersectionality of domestic abuse with disability and sexuality that haven't been captured in this response.

All the organisations who contributed to this response have rich insights to contribute to the development process of the bill. The response only captures so much. We would encourage you to invite these organisations to provide evidence in person at a Committee meeting. As smaller organisations, their voices are not always heard, and we know there are important insights to share – particularly from communities who are the furthest from power.

Section 1

The Bill proposes to introduce notification and monitoring requirements for certain people convicted of domestic abuse. They would be required to tell the police about things like their home address and other addresses they regularly stay at, their passport details and if they change their name. Police would also be able to visit and monitor them.

1.1. What are your views on this proposal?

Organisations generally welcomed the introduction of a notification and monitoring system for perpetrators convicted of domestic abuse. However, if the goal is prevention – this was not seen as a viable solution to prevent domestic abuse. This is because the proposed system relies on convictions. Almost all organisations who participated told us that most people they support do not get to the point of reporting domestic abuse - let alone reach a conviction stage.

Some organisations had concerns that the register could be open to misuse or an abuse of power. There were concerns that once someone is on the register, it would be difficult to remove the stigma attached to them if there had been a miscarriage of justice.

If the scheme was implemented, there were concerns at the risk this may present to the victim-survivors. We know that sometimes victim-survivors return to, and continue to live with, the perpetrator. There were concerns that the ongoing monitoring and restrictions could lead to escalation of the domestic abuse – this was raised particularly in relation to potential police visits to the home.

However, organisations felt these things could be addressed by a properly resourced and sensitively handled system. This should include significant and rapid expansion of trauma-informed approaches for all staff involved. There should be investment in support services for victim-survivors – ensuring they can access safe housing, mental health support, and financial aid. This could reduce the likelihood of victim-survivors having few options but to live with the perpetrator and could reduce the ongoing risk to the register monitoring requirements.

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

Overall, organisations feel the bar is set too high for what is considered a domestic abuse offender. They told us that many offenders are never convicted, let alone receive a custodial sentence or community payback order. The offenders that this bill would apply to was described as “the tip of the iceberg”.

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

Whilst it was felt that this could improve safety – organisations were not sure that it was an effective way to do this. Organisations felt there were better ways to improve safety for victim-survivors. With this scheme, the onus is put on the victim-survivor to report the crime, to gather the evidence, to navigate what are often traumatic legal proceedings, and to reach a conviction stage.

Organisations felt this scheme would also only protect victim-survivors whilst they were in Scotland. Organisations told us that when victim-survivors visit family abroad or in other parts of the UK – there can be pressure put on the individual to accept their domestic abuse as normal or retract their report. Families are not always safe spaces for victim-survivors.

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

There could be risk to the partner, or a new partner, of this scheme with monitoring and surveillance leading to escalation of domestic abuse and violence. This was also highlighted as a risk to any children connected to the offender or victim-survivor. However, most organisations felt that the value of having the system in place outweighed the risks.

Throughout the conversations, Police behaviour was repeatedly referenced as being an area where improvements are needed. Organisations told us there is distrust of the police amongst many communities including Black and racialised communities and women affected by domestic abuse and violence. There were also concerns about the misuse of power for people on the register from Black and racialised communities.

As a general point, organisations wanted a greater understanding of how this scheme would interact with the Disclosure Scotland Domestic Abuse Scheme and Clare's Law.

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?

Many organisations had no views on this. Those that did suggested adding:

- Whether any new child births have been registered with the perpetrators name as a birth parent.
- More detail on how to account for people who have no fixed abode.

- If an offender is going on holiday.

Organisations asked for more detail on how the scheme would operate when someone moves to another of the UK nations.

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

Many organisations had no views on this. Those that did said it felt right.

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

Penalties should be relative to those given to people convicted of domestic abuse offences. Some felt that these penalties were more severe than those for domestic abuse offences and “would be laughed at by offenders”. For victim-survivors it could be deeply upsetting to see an offender receive a harsher penalty for failing to notify the register, than they did for the domestic abuse offence.

Several organisations highlighted that work would be needed to ensure that the penalties were clear and understood by the perpetrators so that they could abide by the conditions. This would include having access to interpreters and the information in different languages.

2. Risk Notifications

The [Disclosure Scheme for Domestic Abuse Scotland](#) (DSDAS) gives people the right to ask if someone has a history of domestic abuse and lets the police tell people that they may be at risk without being asked. The Bill does not make any changes to this disclosure scheme.

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

DSDAS was seen as vital. Organisations told us that perpetrators now know they may be subject to a DSDAS.

Several of the organisations we spoke to were not aware of the DSDAS scheme. When told about it – they felt it was a useful scheme and thought the people they support could make use of it. A campaign raising awareness of the scheme could be beneficial – particularly for smaller charities or community groups delivering a range of community support not solely focused on domestic abuse.

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

No comment.

3. Rehabilitation and Behaviour Change Programmes

The Bill proposes a power to require certain people who are convicted of domestic abuse offences to be assessed to see if they are suitable to take part in rehabilitation or behaviour change programmes, such as those designed to address violent or controlling behaviour, and that courts, prison throughcare and the Parole Board should take account of this.

3.1. What are your views on this proposal?

Many organisations had little direct experience of these programmes as they work predominantly with the victims and survivors.

Some organisations welcomed a shift in focus towards changing the perpetrator's behaviour highlighting that the onus is often on the victim to progress with charges, report a crime, and manage the consequences. However, most agreed that for rehabilitation programmes to be impactful – the perpetrator often must want to change their behaviour, and this is often not the case with repeat domestic abuse offences. When misogyny is involved, perpetrators are told their behaviour is wrong, and they still don't believe it. It was highlighted that the Caledonia project requires an offender to plead guilty to participate on it which is fundamental to the success of a rehabilitation programme.

For any rehabilitation programme, there can't be a one size fits all approach. These programmes need to be culturally appropriate and address other compounding factors such as drug and alcohol issues, trauma, and racism.

Positive examples were referenced such as the work of Amer Jamil, an Islamic Scholar, whose booklet 'What Islam Really Says About Domestic Abuse' has been widely shared, produced in several languages and led to an Imams against Domestic Abuse campaign across Scotland. Similarly, organisations have produced toolkits designed for service delivery – such as Project Esperanza's Toolkit for Addressing Bias in Scottish Child Protection Practices. Project Esperanza are currently developing a toolkit for tackling FGM. It is vitally important to work in partnership with organisations that are part of communities, have expertise, relationships, and trust.

Organisations felt behaviour change programmes should be available far before conviction stage. If we are to prevent domestic abuse – we need to reach potential perpetrators before they offend. Education was seen as key to this – not just in schools but throughout society and in places where people are.

It was noted that whilst this rehabilitation support and resource will be provided to perpetrator – what is provided to a victim-survivor going through the court system? There needs to be an equal emphasis on wraparound and trauma informed care and support for the victim-survivors. This could include investment in services but also taking a trauma-informed approach to the court proceedings.

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

There were limited views on this – but those organisations that did share insights felt these programmes were often not effective unless the individual wants to change their behaviour. Similarly, perpetrators must believe and admit they have committed a crime for these programmes to be effective. Behaviour change for perpetrators is, anecdotally, most effective when they consider the impact on their children.

Peer to peer relationships were felt to be important in meaningful behaviour change. A positive example was shared by Mwamba – an organisation supporting Black and racially minoritised women. Mwamba run Conversation Cafés which are spaces for people to meet, chat about issues affecting them, and take part in a holistic activity. Mwamba primarily run these for women but have previously delivered Conversation Cafes for men which have explored how to handle emotions. These have been effective at creating peer to peer learning opportunities.

Overall, organisations feel it is often women or victim-survivors leading work to tackle domestic abuse and this needs to change.

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

No comment.

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

No comment.

4. Data collection and reporting

The Bill would require Police Scotland, the Crown Office and Procurator Fiscal Service (COPFS) and charities supporting victims of domestic abuse to collect certain data about victims, and the Scottish Government to then report on it annually. The data would include if they had a disability and their ethnicity. The Scottish Government would also have to produce an annual report on access to services for people affected by domestic abuse. This might include services like advocacy, safe housing, mental health support or legal help.

4.1. Do you support this proposal?

In principle, many organisations support this proposal. However, it was clear that organisations need to know how the information they provide will be used and what action will be taken because of the findings. There needs to be resource and funding in place to support the collection of this data. When presented with a choice between helping an individual or collating data – organisations will prioritise the individual. Targeted funding for staff to do this is essential – this could also ensure consistency in the quality of data captured.

Some organisations told us it would be difficult to collect this data. This is because their services are not described as ‘domestic abuse support’ and their support is delivered holistically through community activities such as cooking, sewing, or musical activities. For these organisations, it doesn’t feel appropriate or easy to gather this information. It can be offensive to ask these questions, and it’s not the point of many of the activities – it’s about doing something positive.

Similarly, many organisations told us that people don’t want to disclose much of this information. People are embarrassed, they may not want to talk about it, or there may be other reasons such as immigration conditions that affect their willingness to disclose data. One organisation told us that the moment they tell women they are keeping record of something – they stop using the service. Similarly, this organisation shared an example of male partners stopping women using the organisation’s services for the same reason.

As the Bill currently stands, this data collection would only apply to charities, but consideration should also be given to Community Interest Companies who deliver services to victim-survivors.

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

Organisations generally agreed that the information suggested would be sufficient. One organisation suggested adding in data around when someone was first affected by domestic abuse. Several organisations questioned why 'nationality' and 'ethnicity' were part of the data being collected and the potential risk for misuse of such information in relation to racist violence and anti-immigration rhetoric.

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

Whilst most organisations felt understanding the full picture of who is affected by domestic abuse would improve support for victim-survivors – many were clear that this data would need to inform tangible action and the direction of resources. Without that, this could become a box ticking exercise with little improvement for victim-survivors.

Organisations felt an improved understanding of the people affected could lead to better targeting of resources – particularly for communities where there may be under-reporting such as some Black and racially minoritised communities. Similarly, organisations told us that services need to understand all the communities they support better – this was particularly in reference to refugees and people seeking asylum.

5. Domestic Abuse Education in Schools

The Bill proposes that education about domestic abuse and healthy relationships should be provided in all schools, with the option for parents to withdraw their child from this.

5.1. What are your views on this proposal?

Organisations broadly agreed that education in schools was vital to taking a preventative approach to reducing domestic abuse. All felt it was right that this should be a mandatory part of the curriculum. Several good initiatives were referenced but delivering these effectively was limited by school's engagement and take up of the offer. Many organisations shared that it is difficult to get into schools to deliver these initiatives. It often relies on whether you have a good contact at the school who values this work.

Organisations expressed concern at the option for parents or guardians to withdraw their child from the education. This was deemed a particular risk for children growing up in households with domestic abuse.

Several organisations stressed the need for this to be delivered by experts and in a culturally appropriate way for all children and young people. It should be acknowledged that this education cannot cover all aspects of what a healthy relationship could look like – and that this should be clear in the education provided.

5.2. At what age should this education begin?

Whilst there were varying ideas on when education should begin, all agreed that the education should be appropriate to the age of the child. This education could begin in primary school if it was taught in a safe and appropriate way - such as how sex education is delivered.

The education should develop as a child moves through the education system. More complex topics such as coercive control should be discussed when children are likely to understand these concepts.

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

Organisations had many suggestions for what topics should be covered. These included:

- An overview of what domestic abuse is and that it is more than just domestic violence. There is a crossover with gender, equality, misogyny, racism, sexuality, and power dynamics. These ideas should be woven through the curriculum.

- Culturally appropriate understandings of what domestic abuse is. A positive example is the work of Amer Jamil, an Islamic Scholar, who produced the booklet 'What Islam really says about Domestic Abuse'. Another example is the work of Project Esperanza who produce toolkits for services to deliver culturally appropriate support.
- It should be clear that men, women, and non-binary people can be victims or perpetrators of domestic abuse. There should be no stigma for young boys.
- What to do if you're affected by domestic abuse. How you can report it and what happens when you do report it. There is a lot of fear related to this when people don't know what will happen afterwards.
- Empathy and respect for one another.
- What personal relationships should look like both inside and outside of the family – this includes parental relationships, friendships, and relationships with peers.
- Where support can be sought — relevant to the area that the education is provided within. This would include statutory services, but also services and support provided by the third sector.
- Understanding boundaries – where does yours finish, and another person's begin?

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

The education needs to be delivered with care and by people who are experts in this area and educating children. It was felt that this shouldn't be a burden put onto teachers who are already stretched. The education should be delivered from a place of deep knowledge and understanding – not something that can be generally picked up in a short CPD session. This would require resource and funding for schools to bring in experts to deliver this education.

For children growing up in households with domestic abuse, we need to think about what support would be in place for them during this education, and beyond. They may be identifying for the first time that what they're seeing at home isn't right and may be confused about what to do about this. Having a trusted adult at the school that they can talk to – and making it clear what this means – would be vital.

Considerable time needs to be set aside to deliver this work and provide children and young adults with the space to explore and understand these issues.

6. Support for Victim-Survivors and their Families

The Bill does not directly change how support services are delivered, but it does aim to improve information and prevention.

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

All organisations felt the bill did not go far enough in addressing the needs of people affected by domestic abuse.

Many organisations spoke about the complexity of navigating systems for people affected by domestic abuse. Often, the most vulnerable people in society are at the greatest risk of ongoing domestic abuse – because they have very few options available to them to leave. One organisation described the journey of leaving an abusive situation as “leaving one struggle – to only go into another struggle”. This intersects with poverty, ill health, financial exclusion, immigration – through the No Recourse to Public Fund restrictions, and intergenerational trauma. We need system wide change to meaningfully support the needs of people affected by domestic abuse.

This Bill is focused on the perpetrators – what is the equivalent support for people affected by domestic abuse?

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

Many organisations spoke about the intersectionality with other policy areas such as housing, poverty, health, and immigration. Often those experiencing domestic abuse are some of society’s most vulnerable – and leaving an abusive relationship can be a difficult choice. One organisation described it as “you leave one crisis, and go straight into another crisis with temporary accommodation, poverty, or the removal of a spousal visa”. We need significant change across society - there is no point teaching children one thing but then their life experience is something else. An example was given that if we teach children that all genders are equal - how does this account for a gender pay gap?

Organisations had many ideas for ways to improve support for victim-survivors, such as:

- Review of the court system and criminal proceedings centred around how to take a trauma informed approach and what a meaningful conviction for domestic abuse looks like.

- Extensive training for Police. Several organisations told us that the approach of the Police to victim-survivors needs to be trauma informed.
- Education throughout society – not just in schools. Campaigns of behaviour change should flow throughout society – in hairdresser's, building sites, public spaces.
- Recognising that for victim-survivors – their wider families are often not safe spaces for them.
- There needs to be more safe spaces for people fleeing domestic abuse. Organisations told us that refuges are being cut, and it is incredibly difficult to find someone a safe space to live if they do choose to leave an abusive situation.
- There needs to be financial support for people leaving abusive situations.
- Similarly, financial abuse is widespread for people supported by these organisations. Often one partner is working and controls the finance which really restricts the choices available for the victim-survivor to leave.
- Priority access to mental health services for people affected by domestic abuse.
- Language and interpreter services that can be accessed by anyone – including people subject to No Recourse to Public Funds (NRPF).
- Priority access to physical and sexual health services. One organisation gave an example of trying to get an IUD contraception for a woman they were supporting. They were told this wasn't possible and to call back in a few months to ask again. In the meantime, the woman was advised to use condoms. The woman wanted the IUD because the man refused to use condoms.
- Access to safe housing – people are being housed in temporary accommodation which is often mixed gender and does not feel safe for victim-survivors.
- Being clear with people about what reporting domestic abuse means to address fear for people in reporting.
- Access to legal aid. This was given as an example for people going through divorces who are subject to NRPF who are unable to access legal aid. Often the perpetrator can afford representation (as they control the money and

work) but the partner cannot. This was a particular problem for people on spousal visas and those subject to NRPF.

- One organisation shared an idea of engaging with social media and tech companies to increase awareness of current initiatives. The example given was an advertising campaign or pop up on major dating apps that would let users know about the DSDAS scheme operating in Scotland.

7. Concerns About Privacy, Policing or Human Rights

Some people may have concerns about how the notification requirements and monitoring of domestic abuse offenders could affect people's rights - for example, around privacy or data protection.

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

Most organisations felt that once someone is convicted of a domestic abuse offence – being placed on a register was a reasonable outcome. Whilst this would impact their privacy – it was felt this was a justifiable response.

However, several organisations highlighted that the Police need to be able to work safely with someone regardless of whether they are a victim-survivor or a perpetrator. Grant holders told us this “requires addressing systemic racism and police brutality”.

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)?

Organisations recognised the potential for information gathered to be weaponised. Examples were highlighted of recent racist violence and ‘protest’ in Scotland targeting Black and racially minoritised communities in relation to immigration. If this information is gathered, we need to be very careful about how information is used and shared.

8. Practical Considerations and Resources

Implementing the notification requirements and monitoring, rehabilitation programmes and school education would all require resources, training and support

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

This Bill would require significant resource with a long-term commitment beyond a single parliamentary session. This resource needs to be available for a range of organisations – including many vital community groups that are delivering support through holistic activities and offering safe spaces for victim-survivors of domestic abuse. These organisations told us they're often not able to access funding streams such as the Delivering Equally Safe Fund because they have a broader focus than solely tackling domestic violence.

Organisations told us that many of the people they support need access to existing services that they are excluded from. One example given was people subject to the NRPF immigration clause which restricts access to health services, financial support, and legal aid.

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

Organisations felt more investment in services was needed to support victim-survivors in their journey to recovery. Access needs to be opened for people subject to NRPF who are experiencing domestic abuse.

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?

All the organisations who contributed to this response have rich insights to contribute to the development process of the bill. The response only captures so much. We would encourage you to invite these organisations to provide evidence in person at the Committee. As smaller organisations, their voices are not always heard and we know there are important insights to share – particularly from communities often the furthest from power.

Many organisations felt they need to be included earlier in the development stage of policy design. There needs to be a willingness to engage and listen from the earliest stages. It can feel like a box ticking exercise when organisations and people with lived experience are consulted after a plan has been set.

Lastly, this response captures the insights of organisations supported by Corra through the Henry Duncan Grants Fund. We know that there are important and valuable insights on the intersectionality of domestic abuse with disability and sexuality that haven't been captured in this response.

About Corra Foundation

Corra Foundation exists to make a difference to the lives of people and communities. It works with others to encourage positive change, opportunity, fairness and growth of aspirations which improve quality of life. Corra wants to see a society in which people create positive change and enjoy fulfilling lives.

In 2020 Corra launched a ten-year strategy. It is long term because making a difference on the big challenges will take time. At its heart is the strong belief that when people find their voice, they unlock the power to make change happen.

Our ways of working

At Corra we have a set of principles that we strive to put into practice across our roles as an employer, independent funder, charity and partner, as well as in our influencing activity.

We will:

- Listen and respond to people, communities and organisations and amplify voices that are less well heard – their wisdom is at the heart of Corra's approach.
- Build relationships, always working alongside others on the basis of shared power, mutual trust and shared learning.
- Pursue diversity, equity and inclusion (DEI), trying to challenge structural discrimination and contribute to radical shifts in the funding sector.
- Be an open, trusting and flexible grant maker.
- Ensure we contribute to tackling climate change, through our investments, operations and grant making and encouraging others to take action alongside us.
- Be bold, taking considered risks and supporting others to do the same.

Date of publication: 15/09/2025

Corra Foundation
Office Suite 30 Pure Offices
4 Lochside Way
Edinburgh EH12 9DT
e: hello@corra.scot
t: 0131 444 4020



www.corra.scot

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