Criminal Justice Committee Wednesday 3 December 2025 33rd Meeting, 2025 (Session 6)

Prevention of Domestic Abuse (Scotland) Bill Note by the Clerk

Introduction

- 1. The <u>Prevention of Domestic Abuse (Scotland) Bill</u> was introduced on 7 May 2025.
- 2. The Bill seeks to reduce domestic abuse by making changes in four areas:
 - The Bill introduces notification requirements for domestic abuse offenders, requiring them to provide the police with details such as all names used by them, their date of birth, address and passport details, and enabling them to be assessed and managed under multi-agency public protection arrangements (MAPPA).
 - The Bill requires consideration of whether someone convicted of a domestic abuse offence is a suitable candidate to take part in a rehabilitation programme or services with the aim of reducing reoffending.
 - The Bill places a requirement on Police Scotland, the Crown Office and Procurator Fiscal Service and charities to ask for specific information from victims of domestic abuse. This information would be provided on a voluntary basis and the Scottish Government would need to publish an annual report on the data gathered.
 - Lastly, the Bill requires the Scottish Government and education authorities to promote, facilitate and support domestic abuse education in schools.
- 3. On <u>25 June 2025</u>, the Committee held an initial evidence session with the Member in Charge of the Bill, Pam Gosal MSP.

Today's evidence on the Bill

- 4. At today's meeting, the Committee will take oral evidence from a number of women's groups and those providing local delivery of support services to victims and survivors of domestic abuse. The Committee will hear from—
 - **Debbie Jupp**, Operational Manager, Committed to Ending Abuse
 - Dr Marsha Scott, Chief Executive, Scottish Women's Aid

- Agnes Tolmie, Chair, Scottish Women's Convention
- Tumay Forster, Operational Manager, Shakti Women's Aid
- 5. The following submissions have been provided to the Committee, which are produced at Annexe A—
 - Committed to Ending Abuse
 - Scottish Women's Aid
 - Scottish Women's Convention

Further reading

- 6. See Paper 3 for a SPICe briefing on the Bill.
- 7. Responses to the Committee's Call for Views on the Bill can be found online.
- 8. Both the <u>SPICe analysis of submissions to the Call for Views by individuals</u> and the <u>SPICe analysis of submissions to the Call for Views by organisations</u> can be read online.

Clerks to the Committee December 2025

Annexe A

Written submission from Committed to Ending Abuse

Committed to Ending Abuse (CEA) supports adults, children and young people in the Falkirk area who have been affected by domestic abuse and trauma.

We are a fully inclusive service committed to ending all forms of abuse. We provide support and advice to anyone regardless of age, beliefs, ethnicity, faith, gender, sexual orientation and race. CEA provides individual support as well as group work.

We provide counselling, mentoring, support networks, creative and expressive arts workshops, parenting workshops, and training for other organisations.

We provide a range of specialist services working in partnership within local schools, and other organisations and across Scotland to raise awareness of Domestic Abuse and coercive control to help young people recognise "red flag" behaviours and know where and how to get help.

We were established in 1976 as Falkirk and District Women's Aid, part of the Scottish Women's Aid network together with Glasgow, Edinburgh and Dundee. In the last forty-nine years our organisation has grown from strength to strength responding to changing social, political and economic climates and adapting our services to reflect changing needs.

Our Values:

- Maintain the safety of people (and where appropriate their friends and families) affected by gender based violence.
- Reduce risk for those people (and where appropriate their friends and families) affected by gender based violence.
- Hold perpetrators to account for their actions.
- Remain non-judgemental concerning people using our services.
- Empower people using our services and facilitate their decisions and life choices.
- Have the moral courage to challenge poor practice when it impacts adversely on people using our services.
- Support the emotional, mental and physical well-being of people using our services.
- Support the emotional, physical and mental well-being of our staff and volunteers.
- Recognise that the people who use our service are individuals with a range of individual needs.

1. Notification requirements and monitoring of Domestic Abuse Offenders

1.1 What are your views on this proposal?

We feel this may act as a good deterrent overall especially as it would require convicted persons to be monitored more closely, providing their personal information and circumstances in order to do so. This would hopefully mean that perpetrators of domestic abuse cannot move around as freely across borders where historically they have done so and continued to offend, falling under the radar and becoming 'lost' to agencies such as police and social work. Concern was discussed around particularly young and first time offenders and the impact this may have on young people looking for employment which could become a barrier to their rehabilitation. However, it was also highlighted that there has been an increase in young perpetrators and victims of domestic abuse becoming known to our service with a low conviction rate and thus no deterrent for future offending. It was also acknowledged that the Bill may reduce re-victimisation and aid the healing process for survivors of abuse who may feel safer knowing perpetrator(s) are being monitored more closely.

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

We feel the definition covers what would be expected for this. However, consideration could be given into how those are monitored who are identified as repeat offenders but not convicted and how they are defined/referred to as within the Bill. Our professional experience is that far too often survivors are left without justice because of e.g. technicalities in court and the alleged perpetrator can continue their abuse. They are often known to services whether or not they are convicted and are repeat offenders.

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

Yes and it should work within a multi-agency co-ordinated response. For example, housing have placed perpetrators of domestic abuse near to survivors which cannot only increase risk to their physical safety but also to their emotional and psychological wellbeing. A multi-agency response (similar to that of MARAC) will allow services to share information with one another to proactively keep people safe within the community. Information sharing in this respect is vital and it would not be effective for such information to be gatekept solely by e.g. police and social work.

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

Potential breach of information sharing as well as the potential for it to be ineffective if no information is shared therefore, there should be clear guidelines around this process. It was also considered that offenders may try to use their own mental health and/or additional needs as a means of evading prosecution and being placed on the register.

In respect of first time offenders, it was discussed that consideration may be given to the seriousness of the crime as to whether or not they be placed on the offenders list or for how long.

Further to this, we would seek clarification on how services then manage risk - once a person is added to the list it cannot be considered as 'dealt with' and thus resources would need to be made available to proactively manage the offenders list. How will offenders' compliance be monitored and managed realistically and proactively, not reactively?

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?

- Employment often repeat offenders find work with friends or family and are paid cash in hand but this can include work whereby they enter private and
- residential properties or travel to carry out the work e.g building work, contractual work.
- Any new relationships they are in.
- Online status what social media sites they are on and their user names.
- Diagnoses of mental health conditions and additional needs.
- Red Flag system could be adopted to capture the nature of the offence and other aggravators such as weapons and drugs.
- Tattoos and distinctive features.
- Gender and gender reassignment.
- Any children's details, biological, as well as living with them.

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

We feel this should be risk based and high risk should be immediate notification. Could they be held in custody until they provide the necessary information? We wondered if there was clarity around the 3 days notification (is it 3 days or 3 'working days') and therefore could this essentially be 5 days? Discussion was also had again around the responsibility to manage this and not solely relying on the offender to do right in the situation and what the consequences may be for failing to provide the information. In our professional experience, survivors of abuse feel it necessary they have to keep track of the offenders, where they are and what they are doing because it is embedded in their own safety planning - the impact of feeling this process is not resourced effectively would be detrimental to those who have suffered and still do suffer from ongoing trauma related symptoms. Similar to the RSO, could offenders be required to check in regularly as well as there being unannounced visits to their address?

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

There were questions from our discussion around what the timescales may be like for failing to comply and penalties being enforced as it wouldn't be effective as another drawn out court process and further allowing the offender to re-offend.

It was also agreed in our discussion that offenders (if issued a fine) should be expected to pay it or go to jail. Courts have been known to issue unrealistic

'payment plans' that allow for extremely small payments that still go unpaid and are allowed to be deferred for different reasons. This does not deter offenders.

2. Risk Notifications

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

From our perspective as a SafeLives-accredited service, the provisions are likely to lead to an increase in disclosures. Placing notifications on a statutory footing gives agencies greater confidence to act where there is a credible risk. This should mean a more consistent application across Scotland and reduce regional variation.

It was noted that already there are a lot of disclosures being made however awareness of it may continue to grow especially for people who are experiencing 'red flags' or whose family and/or friends have identified them and who then may go on to request a disclosure.

A question that was raised throughout this discussion was: Does being on the offenders list result in automatic disclosure to partners/new partners of offenders? This may be a consideration

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

Yes. The Bill could be strengthened by ensuring that disclosures are always accompanied by referral to specialist advocacy. Survivors need immediate access to safety planning and trauma-informed support when a disclosure is made. National guidance should also clarify thresholds and professional judgement, to avoid over-disclosure that could heighten risk or retraumatise survivors.

The Bill only appears to allow for convictions to be disclosed in line with the Disclosure Scheme and as previously highlighted, some domestic abuse reoffenders have no convictions. The Bill could allow there to be a more holistic approach to sharing information and keeping people safe.

The Bill could influence the ability to share more specific information within a disclosure in terms of crimes committed and offender's character as well as levels of risk. The disclosures would be more meaningful. The disclosure could also include if the offender is on the offender's list.

3. Rehabilitation and Behaviour Change Programmes

3.1 What are your views on this proposal?

Embedding assessments at sentencing, custody and pre-release is positive, as it introduces consistency. From our experience, however, these assessments only

have value if the programmes offered are evidence-based, survivor-focused, and of proven quality, such as those aligned with the Caledonian System (an accredited domestic abuse behaviour change programme in Scotland). The programme should be made available to perpetrators not just those who have been convicted. What evidence is there that the programme has made a difference to stop the perpetrator re offending? The feedback from victims whose perpetrators have completed the programme has not been good.

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

Yes, but only where fidelity is maintained and survivor safety remains central. Programmes that hold perpetrators to account while providing parallel support to (ex)partners can reduce reoffending and improve safety. Without this survivor-facing element, behaviour change interventions risk being ineffective or unsafe.

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

Tracking of all those who have completed the programme to see if there are any reoffenders. Monitoring during the course to make sure that they are staying away
from the victim and that they are adhering to their conditions from police/court. Could
the course be offered to perpetrators before they are convicted? Having a follow up
meeting with all those who complete the programme to see if there has been
changes/progress including follow up with survivors.

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

No. Provision is patchy, and demand already exceeds capacity. In many areas, survivors are left waiting while perpetrators receive no intervention, which undermines confidence in the system. Without ring-fenced funding and expansion of accredited provision, this gap will only widen.

4. Data collection and reporting

4.1 Do you support this proposal?

Yes in principle. Better data can highlight inequalities, strengthen commissioning, and improve prevention. However, in practice we see survivors disengage when data requests feel intrusive or poorly timed. Collection must be trauma-informed, with optouts clearly explained.

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

The intention is right, but the detail needs careful co-design with frontline services. Data should be proportionate, survivor-tested, and gathered in a way that does not increase risk or workload unreasonably. For third-sector services like ours, additional information technology (IT) and staffing resources would be essential to deliver this safely. Information must also be gathered to show in what areas that the system is failing to support, and people are falling through the cracks. More information needs

to be gathered on the perpetrator – sexual orientation, religion, if they have children, if they are in a relationship, is this the first time that the victim has been through domestic abuse.

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

If the numbers and information is gathered from all services and charities that support victims through all stages of domestic abuse, then it will make the Government aware of the true number of people who suffer domestic abuse. Information around demographics can be obtained and scrutinised per area which might help identify communities that are affected the most but also those that are perhaps under-reported and thus has the potential to address barriers that some communities face in seeking support.

5. Domestic Abuse Education in Schools

5.1 What are your views on this proposal?

We strongly support a statutory duty for schools to deliver education on domestic abuse and healthy relationships. Early intervention is vital, and this would help ensure consistent coverage across Scotland. The education must be delivered by a charity or specialist service provider and not a teacher who does not have knowledge and experience to deliver the information. Where is the information coming from that is being taught in the schools? CEA have previously done a workshop in schools in the Falkirk area and have had great feedback from pupils. If parents do not want their children to partake in the workshop, then a reason should be given and noted down.

5.2 At what age should this education begin?

Education should begin in primary school, focusing on respect, empathy and safe boundaries, then progress in complexity through secondary years to cover consent, coercive control and abusive behaviours. In nursery the children should be learning about healthy relationships, after that a workshop should be taught every year, so it is age appropriate.

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

Key topics should include: respect, equality, consent, coercive control, digital abuse, bystander intervention, and gender stereotypes. Recognising 'red flags' in relationships. Content must be inclusive of lesbian, gay, bisexual, transgender and queer (LGBTQ+) experiences and accessible to young people from diverse cultural backgrounds. Working with specialist services to co-deliver or advise would ensure content is relevant and survivor safe. Teaching what healthy relationships and unhealthy relationships are. Being able to say No, toxic friendships, boundaries and the impact relationships can have. Also, the impact of what witnessing abuse can have. Safety planning so the children know what to do if they witness abuse and how they can safely interact with the perpetrator and get help. Making them aware of who they can contact for help or advice online and via telephone.

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

The person who is delivering the workshop is a trained volunteer/charity/professional from a specialised service. Making sure more funding is available to be able to help. Safety planning so children don't challenge the perpetrator by putting themselves at risk.

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?

Not fully. The Bill strengthens prevention and risk management but does not sufficiently address the parallel increase in demand for frontline support. In our service, waiting lists are already significant; additional duties will likely increase referrals and need. There are not provisions for survivors.

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

Sustainable, multi-year funding for specialist advocacy, children's services, and byand-for organisations is essential. The Bill should also ensure survivors are
supported through recovery, not only crisis, with accessible therapeutic and housing
options. Dedicated liaison posts linking schools, Multi-Agency Public Protection
Arrangements (MAPPA), and specialist services would improve consistency and
reduce gaps. More training to be given to the police and courts so there is more
understanding for victims. Schools having liaisons who deal with domestic abuse so
they can have better support for teachers and pupils. Funding for programmes to
help victims and children learn to build their self-esteem and confidence back up, this
being self-defence classes, gym passes, days out and workshops. Media campaigns
to target different age groups informing them of where they can get help and the
signs of the different types of abuse, not just physical.

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?

Yes. The expansion of notifications and data processing engages privacy rights under Article 8 of the European Convention on Human Rights (ECHR).

These measures must remain necessary, proportionate and time-limited, with clear safeguards, transparent guidance, and accessible solutions and safety plans for those affected.

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)?

Yes. In our practice we see additional barriers for racialised communities, migrant individuals with insecure immigration status, disabled survivors and

LGBTQ+ survivors. Data and notification processes must be designed to ensure these groups are not inadvertently disadvantaged or placed at further risk. Equality monitoring and targeted support should be built in.

8. Practical Considerations and Resources

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

Yes. Each element of the Bill, notifications, MAPPA, rehabilitation assessments, data collection and education has significant resource implications. Specialist advocacy services will need increased capacity to handle more referrals, attend MAPPA meetings, and respond to disclosures. Consideration needs to be given to ensure the necessary monitoring takes place and the new law is followed. How much is this additional work going to cost and who is going to pay for it? It can't be added to local council areas responsibilities without extra funding provided.

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

Yes. Rural areas face challenges due to fewer services and risks to anonymity. Schools will require training and support to deliver the curriculum consistently. For the third sector, long-term funding and IT investment are essential to manage data safely and sustainably. All areas will need consistent support as this is a new process which they won't have the experience or knowledge to implement the necessary changes. Society already holds a huge amount of assumptions about domestic abuse and this needs to change to ensure it is implemented properly.

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?

Implementation should be phased and piloted to test effectiveness and prevent unintended harm. Independent evaluation and a standing survivor advisory group would strengthen oversight. Alignment with Equally Safe (Scotland's strategy to prevent and eradicate violence against women and girls) and Multi-Agency Risk Assessment Conferences (MARAC) is crucial to avoid duplication. With adequate safeguards, survivor involvement, and resources, the Bill could significantly improve prevention and protection. Training must be mandatory for Sheriffs, police and teachers on domestic abuse and safety planning. Will the information that is being gathered be used to help local areas gain more funding?

This response was collated with input from all staff members within the organisation and all views recorded in this one submission.

Written submission from Scottish Women's Aid

Scottish Women's Aid is Scotland's national strategic organisation working to end domestic abuse. We act as an umbrella for the 32 grassroots services across Scotland, host Scotland's Domestic Abuse and Forced Marriage Helpline, and advocate and campaign for progressive policies and practices that reduce the inequalities that enable abuse and constrain women and children.

1. Notification requirements and monitoring of Domestic Abuse Offenders

1.1 What are your views on this proposal?

SWA welcomes any measures that we are confident would increase safety for survivors and accountability for offenders. Unfortunately, after consultation with colleagues across the system, we are not confident that this element of the proposal would actually make engagement with the justice system safer, and we see significant unintended negative consequences.

The bill proposes to apply to offenders convicted on indictment. The vast majority of domestic abuse cases are heard in Summary Courts, and the notion that there is "serious" and "non-serious" domestic abuse flies in the face of the evidence of harm, fear, trauma, and injury described in Summary cases. More important, existing arrangements for all offenders, as flawed as they are, provide a foundation for multi-agency information sharing, monitoring, and safety planning that this proposal fails to take account of. We worry that a new procedure designed to protect a small minority of victim/survivors will in fact damage the existing infrastructure designed to protect all victims/survivors.

Existing multi-agency risk assessment and management infrastructure, while in need of strengthening on many fronts, is our good practice, with a focus especially on MARACs and MATTACs. This approach has been developed with specialist expertise, survivor input, and rests on a foundation of decades of research that indicate the importance of a rapid, stream-lined, and bespoke process for responding to the safety needs of survivors by protecting them and intervening with offenders. The best way to improve safety is to invest in making good multi-agency work consistently available to all survivors across Scotland.

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

No answer given.

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

See above. Most survivors will experience years of post-separation abuse, particularly when young children are involved. In that context, the notification and monitoring scheme is likely to create a false sense of safety for survivors and assumptions that women and children are safer when time periods expire. This

seems more likely than that the proposed monitoring will substantially improve safety for the small percentage of victims covered.

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

Our biggest concern is the bureaucratic burden on the system this element of the bill would impose while focusing exclusively on a small number of offenders and offering little for the majority of survivors. MARACs and local multi-agency cooperation in domestic abuse cases are not resting on a statutory requirement. MAPPA arrangements do operate on a statutory footing, are tailored for sexual offenders, and are not and never have been fit for purpose for domestic abuse offenders. We predict that extending police and local system responsibilities to using the MAPPA framework for these domestic abuse cases will be using the wrong tool, and most worrying, create a competition for resources that operations and arrangements NOT on a statutory footing like MARACs will inevitably lose. Women and children will thus lose the multi-agency supports most likely to protect them.

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?

No answer given.

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

No answer given.

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

No answer given.

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

No answer given.

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

No answer given.

- 3. Rehabilitation and Behaviour Change Programmes
- 3.1 What are your views on this proposal?

SWA struggles to see how this proposal will make victim/survivors safer, given the work over the past decade to develop Scotland's accredited and evaluated perpetrator program, Caledonian. We are well aware that even when developed and implemented according to good-practice guidelines, perpetrator treatment programs demonstrate success in a minority of cases. (See https://www.work-with-perpetrators.eu/european-standards-for-perpetrator-programmes.)

One of the minimum requirements for safety is a coordinated partner and child support service. A significant body of research has developed to support the Caledonian model, and we hear from our network that in areas without a program, local criminal justice social work teams are pressured to deliver programs that are cheaper, require less time and less expertise with no infrastructure. This is dangerous practice. We are not confident that the proposal improves on existing practice and may indeed impede progress in this area.

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

No answer given

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

No answer given.

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

No answer given.

4. Data collection and reporting

4.1 Do you support this proposal?

Partly. SWA agrees with the need to collect better data; it should lead to better evidence-based policy- and decision-making which will improve support and provide appropriate services for women and children. We have long advocated for public sector organisations to collect and publish disaggregated data, on BOTH complainers and accused.

Women's Aid specialist services collect data on the women who use their service, to provide the most appropriate services for women in their area. Requiring them to share that data with Scottish Government for this purpose is an unnecessary administrative burden. It could also seriously undermine the relationship they have with the children and women they support.

However, we are keen that the duty include the Scottish Courts and Tribunal Service, which holds critical sentencing data, as well as Police Scotland and COPFS as well as the Scottish Legal Aid Board.

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

Again, data needs to be collected on accused/perpetrators. We are also keen to see the impact of domestic abuse on children more visible and would add children in the family to the list.

While gathering more detailed data on survivors' and offenders' identities are needed to shape services and funding provision for both services and criminal and civil sectors, careful consideration must be given to how this information is published. Survivors who have experienced domestic abuse exist across society, as do the offenders who abuse. Unfortunately, unhelpful stereotypes persist. Published data could be interpreted in a way that perpetuates these stereotypes and that feeds misogyny, racism, able-ism, and other dangerous attitudes.

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

No answer given.

5. Domestic Abuse Education in Schools

5.1 What are your views on this proposal?

SWA supports Equally Safe in Schools, an evaluated and positive resource for many schools in Scotland, and we suggest that properly funding and rolling out that program would deliver the intention of this proposal. The proposal as stands raises some alarms for us—the implications for children and parents who choose to withdraw their child, for children in the class who disclose abuse in a setting not properly trained to respond safely for the child are two scenarios we worry about.

5.2 At what age should this education begin?

No answer given.

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

No answer given.

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

No answer given.

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?

Scotland has a laudable history of using survivor-led, grass roots organisations and experts to design and deliver appropriate support services. What they, and the children and women they support every day, need are requirements to restructure the way that local support services are funded, replacing the inadequate and

ineffective system with a need-based one that sustains resilience and innovation and that shores up what is a critically vulnerable network in Scotland.

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

No answer given.

- 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?

No answer given.

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)?

No answer given.

- 8. Practical Considerations and Resources
- 8.1 Do you have any views on the practical challenges or resource implications of this Bill?

No answer given.

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

No answer given.

- 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?

SWA welcomes the intentions underlying this bill. We note, however, that the bill would better reflect actual prevention of domestic abuse if it followed the principles of Equally Safe in targeting the poverty of income, power and safety that women and children live with that enables abusers and constrains victims-survivors.

Written submission from Scottish Women's Convention

The SWC is funded to engage with women across Scotland to ensure that their views are represented in policy and decision-making processes. The SWC uses the views of women to respond to a variety of parliamentary, governmental, and organisational consultation papers at Scottish, UK and international levels.

The SWC gathers information using different methods, including roadshows, thematic conferences, surveys, and both in-person and online roundtable events. This submission presents the views of a range of women, reflecting their opinions, ideas and lived experience. Working together with many other equalities organisations and community groups, we use our broad network to ensure that women from a range of backgrounds are heard and acknowledged. We are continually reviewing innovative ways of engaging with women and developing our trauma-informed and culturally sensitive practice to support vital contributions from as many women as possible.

1. Notification requirements and monitoring of Domestic Abuse Offenders

1.1 What are your views on this proposal?

The SWC support the intent behind the Prevention of Domestic Abuse (Scotland) Bill, particularly its focus on improving public protection. The introduction of notification requirements is a positive step towards ensuring that those who pose a risk are monitored appropriately. However, we are concerned that the Bill places a significant degree of responsibility on the offender to self-report, which may undermine its overall effectiveness.

The current framework relies heavily on the assumption that offenders will voluntarily comply with notification duties, and that they will understand their obligations. This may not reflect the reality of working with individuals who have a history of non-compliance and/or manipulation. In cases where the offender is not subject to ongoing supervision, the risk of non-reporting is particularly high.

To strengthen the Bill, we recommend introducing automatic notification triggers linked to sentencing or release procedures, ensuring that the requirement is activated and recorded without relying solely on the offender's initiative. Additionally, the Bill could benefit from clearer enforcement mechanisms and inter-agency collaboration to detect and respond to non-compliance. For high-risk individuals, it may be of value to explore mandatory supervision periods to ensure that notification duties are fulfilled.

We also recommend that the Bill include more post-release monitoring tools, such as electronic tagging and foreign travel notifications. These measures alongside oversight mechanisms similar to Multi-Agency Public Protection Arrangements (MAPPA), would significantly strengthen the ability of authorities to manage ongoing risk. Their inclusion would align the Bill with best practice in offender management and ensure that high-risk or repeat offenders are subject to consistent supervision.

Reducing reliance on self-reporting and embedding stronger safeguards would enhance the Bill's ability to deliver public protection and ensure that risk is managed proactively and consistently.

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

The definition provided is robust in relation to those convicted of domestic abuse offences. However, by only including the narrow scope of those who have been formally convicted, a significant number of individuals who pose a serious risk are likely to be excluded.

Convictions can be prevented for multiple reasons, for example, evidentiary challenges, fear of reporting, or systemic barriers within the justice system. As a result, many perpetrators are known to services – including police, social work, and third sector organisations – but fall outside of the scope of the Bill's provisions. This undermines the Bill's preventative aims and creates gaps in public protection, particularly for victim-survivors who continue to face risk from individuals not subject to formal monitoring.

We therefore recommend that it include discretionary powers for authorities to apply certain provisions – such as notification requirements or behavioural assessments – to individuals assessed as high risk. This would allow for a flexible approach, that reflects the realities of abuse as a pattern of behaviour, not just a criminal conviction.

Additionally, the definition of a domestic abuse offender can vary by UK nation, and at an international level. It is therefore imperative that continual review occurs to ensure an evolving understanding of a domestic abuse offender. This should also encapsulate domestic abuse more generally, ensuring that all legislation relating to the proposed Bill remains relevant.

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

We believe that the proposed notification and monitoring requirements will likely provide a meaningful level of support and protection for victim-survivors. The proposed measures represent a step forward in recognising the complexities of domestic abuse.

However, protective orders which are imposed without requiring victim-survivors to initiate legal action can reduce safety. We are concerned that failing to notify victim-survivors may undermine the very protections these orders aim to provide. Victim-survivors must be informed when such measures are in place to ensure they can make informed decisions about safety, movements and interactions. Without this knowledge, they may unknowingly place themselves at risk or miss opportunities to access support services aligned with the protective order.

Moreover, withholding this information can be disempowering and paternalistic, potentially retraumatising victim-survivors who have often had their autonomy eroded by abuse. Respecting their right to know and participate in decisions affecting their safety is essential to a trauma-informed and rights-based approach. We therefore recommend that any protective order mechanism includes a clear and timely notification process for victim-survivors, alongside appropriate support to understand and act on the information provided.

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

No answer given.

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?

The Bill sets out a clear list of personal details that individuals convicted of domestic abuse offences must provide to Police Scotland. We would however recommend that workplace or employment information be included as a discretionary requirement. This would allow authorities to request this information, where it is relevant, to effectively enable the operation of MAPPA and risk assess.

Workplace details can be critical in cases where the offender's employment may place them near a victim-survivor's home, workplace, or child's school, or where the nature of their job raises safe-guarding concerns. Criminal justice social workers and police can rely on this information to develop risk management plans and monitor compliance with supervision or exclusion conditions.

Making workplace information a discretionary requirement would strike a balance between privacy and proportionality, allowing authorities to request it, only, when necessary, rather than imposing a blanket obligation. This approach would enhance the flexibility and responsiveness of the notification system while ensuring that public protection remains a priority.

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

We welcome the introduction of notification requirements for domestic abuse offenders as a means of enhancing public safety and accountability. However, we believe that the proposed notification period – set at three times the length of the custodial sentence – requires further scrutiny.

The rationale for this multiplier is not clearly articulated in the Bill's supporting documentation, and it is unclear whether this approach adequately reflects the long-term risks posed by domestic abuse perpetrators. Domestic abuse is characterised by patterns of coercive control and repeat offending, and the impact of victim-survivors can be enduring. A notification period based solely on sentence length may not fully capture these dynamics.

Also, we note that under the Sexual Offences Act 2003, individuals convicted of sexual offences typically face a 10-year notification period for custodial

sentences between six and 30 months (UK Legislation, 2003). In contrast the custodial sentence for domestic abuse offences in Scotland is approximately 16 months, which would result in a notification period of around four years under the proposed Bill. This is significantly shorter than the notification period for sex offenders with similar sentences, despite the comparable seriousness and potential for ongoing risk.

We therefore recommend that the notification period be reconsidered, aligning more closely with the framework used for sex offenders. This would ensure consistency in public protection measures and better protect domestic abuse victim-survivors. Additionally, we suggest that notification periods be subject to risk-based review mechanisms, allowing for extension where ongoing concerns exist.

References:

UK Legislation. (2003). Sexual Offences Act 2003. Available at: https://www.legislation.gov.uk/ukpga/2003/42/contents/scotland

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

No answer given.

2. Risk Notifications

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

The proposed provisions in the Bill may enable more disclosures of domestic abuse offences, however this is difficult to say with full confidence. Similar approaches, such as those set out for sexual offences, have had some positive impacts, but there is limited publicly available data quantifying a direct increase in the number of disclosures since their introduction.

Under Scotland's MAPPA, information about registered sex offenders can be shared with relevant third parties when necessary to protect the public. Recent legislative developments, including proposed reforms to notification requirements and the Disclosure (Scotland) Act 2020, have further strengthened the framework for managing and disclosing risk. These changes reflect a growing recognition of the importance of transparent, risk-based information sharing as a tool for safeguarding. In this context, the notification requirements proposed in the Bill should be similarly robust, ensuring that the public and potential victims are adequately protected through consistent and effective disclosure mechanisms.

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

No answer given.

3. Rehabilitation and Behaviour Change Programmes

3.1 What are your views on this proposal?

The SWC support the proposals surrounding rehabilitation and behaviour change programmes. Providing domestic abuse offenders with improved awareness of the harmful impact of their actions, should work to alter behaviours and attitudes. Therefore, this must be central to any strategy aimed at reducing reoffending and improving outcomes for both victim-survivors and perpetrators.

However, we are concerned that the proposals do not sufficiently address the current capacity limitations within criminal justice social work services. The success of any rehabilitative approach depends heavily on the availability of skilled staff, appropriate resources, and consistent access to evidence-based interventions. At present, many local authorities face significant challenges in meeting demand, and therefore increasing pressures may increase risk.

Without a commitment to increasing investment in criminal social work infrastructure – including workforce development and service expansion – the rehabilitative aims of the Bill may be undermined. We urge that the Bill be altered to consider how it will support the scaling up of criminal social work capacity, to ensure that rehabilitation becomes reality.

We also recommend that the implementation of the Bill be accompanied by a robust monitoring framework to assess the effectiveness of rehabilitative measures and identify any gaps in service-provision. This will be essential to ensuring that the Bill delivers meaningful change.

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

Within Scotland the Caledonian system has shown evidence of reducing harm in cases of domestic abuse by offering a structured, court-mandated programme for those convicted, alongside support for affected women and children. Evaluations indicate that men who complete the programme demonstrate improved emotional regulation and reduced abusive behaviours, while women report feeling safer and more supported (Scottish Government, 2016). Its whole-system approach aligns with Scotland's Equally Safe strategy and contributes to lower reoffending rates (Scottish Government, 2020). However, its effectiveness is limited by availability – currently only in 19 of 32 local authorities – and by the resource-intensive nature of its delivery (Scottish Government, 2020). To maximise its impact, the programme must be expanded and adequately resourced across Scotland.

References:

Scottish Government. (2016). Evaluation of the Caledonian System: Analysis of a Programme for Tackling Domestic Abuse in Scotland. Available at:

https://www.gov.scot/publications/national-guidance-child-protection-scotland-2021-updated-2023/pages/14/

Scottish Government. (2020). Equally Safe: Final Report. Available at: https://www.gov.scot/publications/equally-safe-final-report/pages/9/

Scottish Government. (2020). Scottish Advisory Panel on Offender Rehabilitation (SAPOR): Overview. Available at:

https://www.gov.scot/publications/scottish-advisory-panel-on-offender-rehabilitation-overview/

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

No answer given.

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

No answer given.

4. Data collection and reporting

4.1 Do you support this proposal?

We support the strengthening of data collection methods within the proposed Bill. Understanding who has been subject to violence and abuse is important with regards to funding allocation and service delivery. We would go on to recommend that data collection efforts include perpetrators.

Understanding patterns of offending is essential for developing effective prevention strategies and risk management frameworks. Without robust data on perpetrators, opportunities to intervene earlier and tailor rehabilitation or monitoring efforts may be missed. Therefore, we recommend that perpetrator-focused data is incorporated into annual reporting requirements, ensuring a more comprehensive picture of domestic abuse across Scotland.

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

The Prevention of Domestic Abuse (Scotland) Bill rightly recognises the importance of collecting demographic data from victim-survivors to inform policy and service delivery. However, it is a significant oversight that the Bill does not require the collection of data on all protected characteristics as defined under the Equality Act 2010. Currently, the Bill limits data collection to age, sex, disability, and ethnicity,

omitting key characteristics such as sexual orientation, gender reassignment, religion or belief, pregnancy and maternity, and marriage or civil partnership.

We hold concerns surrounding these gaps as domestic abuse does not affect all groups equally. Women from LGBT+ communities, for example, may experience distinct forms of abuse and face additional barriers to accessing support. Similarly, religious or cultural contexts can shape both the experience of abuse and the response to it. Pregnant women in particular are at a heightened risk of domestic abuse, and survivors who are married or in civil partnerships may face complex legal and financial entanglements. Failing to collect data on these characteristics, increases the risk of overlooking the needs of marginalised groups.

Moreover, the omission may undermine the Public Sector Equality Duty, which requires public bodies to eliminate discrimination, advance equality of opportunity, and foster good relations between different groups. Comprehensive data collection is essential to fulfilling this duty and ensuring that services are responsive to the diverse realities of those affected by domestic abuse.

To strengthen this Bill, the SWC recommends that it should be amended to include all protected characters in its definition of 'relevant' personal data. This would enable a fuller understanding of how domestic abuse impacts different communities and supports the development of equitable, evidence-based policy.

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

No answer given.

5. Domestic Abuse Education in Schools

5.1 What are your views on this proposal?

The Bill's inclusion of a duty on schools to provide education on domestic abuse and healthy relationships is a welcome and progressive step. Women have commonly explained that education is an effective tool in the reduction of violence against women and girls. They have made repeated calls for improved education surrounding healthy relationships and discrimination.

- "...I think education is key, not just for women and girls, but also for men and boys. You know, encouraging men to push back against this rise of misogyny and inequality."
- "[The Scottish Government should] develop learning programmes for pupils to recognise and address misogyny."

We hold some concerns however, that the Bill does not include a statutory commitment to fund this provision. Without dedicated financial support, there is a risk that implementation will be inconsistent across local authorities and schools, particularly in areas already facing resource shortages. The Scottish education system is facing considerable challenge in the current financial climate. Women have pointed to insufficient teaching staff numbers and reduced space for children with

additional support needs. School staff continue to work within a challenging work environment, however, whether they would be able to take on the additional task of effective domestic abuse education is questionable.

- "...support for learning workers, they're the ones being attacked [by pupils], walk the corridors [with pupils], they're the lowest paid in the school, and they're the ones that don't get any training."
- "There is a presumption of mainstream, that means many autistic children will attend mainstream school, but the funding and wide-reaching training is not there to make sure that the school is appropriately staffed"
- "The staffing and resources and adequate funding required to tackle [violent behaviour from pupils] needs to be delivered."

Delivering high-quality, trauma-informed education on domestic abuse requires more than curriculum guidance. It demands investment in teaching training, age-appropriate resources, and ongoing professional development. Schools may also need access to external expertise, such as third sector organisations with specialist knowledge of domestic abuse and violence. Without clear financial backing, ambitions are unlikely to be realised. Domestic abuse education must also be delivered to national standards, with statutory minimum requirements put in place. This actively prevents patchy provision, enabling young people across Scotland to receive good quality, age-appropriate learning.

Crucially, the education duty should also include a requirement to teach young people about the impact of domestic abuse – not just its definitions or forms. Children and young people need to understand how domestic abuse affects individuals, families, and communities, including its emotional, psychological, and social consequences. This helps young people build empathy and awareness, ensuring that education is not abstract, but directed by the lived reality of victim-survivors.

To strengthen this section of the Bill, we recommend a resourcing strategy or statutory commitments to funding for the implementation of this duty, alongside clear minimum standards. This would ensure that all children and young people in Scotland receive consistent, meaningful education on domestic abuse, and that schools are properly supported to respond to the complex realities that may arise from it.

5.2 At what age should this education begin?

Throughout recent discussions with women, they have been resolute in their view, that healthy relationship education should begin from a young age. Some have recommended from nursery; however, the majority believe it is required from early primary school. They have highlighted these formative years as being integral to the anti-misogyny movement, proposing that education be age-appropriate but comprehensive.

- "Change will be difficult. If [misogyny is] a learned behaviour from a young age, it'll be extremely hard to break that...So, if you want to stop this behaviour, it has to start very young"
- "...we definitely need to start having these conversations at primary one."

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

To ensure a robust and effective understanding of domestic abuse, we propose that the underlying causes are considered – in particular misogyny.

Misogyny, both overt and subtle, underpins many of the societal structures and attitudes that enable domestic abuse to persist. It manifests in cultural

norms and interpersonal relationships that devalue women and girls, reinforcing power imbalances and legitimising violence.

Domestic abuse remains fuelled by the continued systemic disadvantage faced by women. Prejudicial attitudes – such as victim-blaming, minimisation of abuse, and the normalisation of male violence – create an environment where women and girls are denied the right to live free from violence. These attitudes are often deeply engrained and perpetuated through media, education, and policy, making it crucial to challenge and dismantle them through targeted intervention.

We advocate for a comprehensive approach to understanding domestic abuse through anti-misogyny education. This learning must go beyond surface-level awareness and delve into the structural and cultural factors that sustain gender inequality. By fostering critical reflection and promoting gender equity, such education can empower individuals and communities to recognise and resist misogynistic beliefs and behaviours.

Moreover, this learning must be intersectional. It is vital to acknowledge and address the multiple and overlapping layers of disadvantage that face women. Women and girls who experience racism, ableism, homophobia, transphobia, poverty, or immigration-related vulnerabilities, often face compounded risks and barriers to support. An intersectional lens ensures that responses to domestic abuse are inclusive, equitable, and sensitive to women's experiences.

In addition to addressing the structural and cultural causes of domestic abuse, it is crucial that educational efforts also encompass the growing prevalence of online harms. Digital spaces have become arenas where misogyny and abuse are perpetuated. Women and girls are disproportionately targeted by online harassment, image-based abuse, stalking, and coercive control, which can have devastating psychological and social impacts. These harms are frequently under-recognise and under-reported, yet they mirror and reinforce the same power dynamics found in offline abuse. Therefore, we propose that learning includes digital literacy and online safety, equipping young people with the tools to identify, challenge, and report abusive behaviours online.

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

The Bill should include provisions for specialist training and support for teachers and school staff, in responding to disclosures of domestic abuse by children and young people. Education on domestic abuse may prompt disclosures, and staff must be equipped to respond safely, sensitively, and in line with child protection practices. This includes understanding trauma responses, knowing how to properly escalate concerns, and being supported to manage the emotional impact of such disclosures.

Additionally, there are significant access barriers to domestic abuse support for marginalised women. Migrants and those with an insecure immigration status face particular challenge, with translation services and culturally appropriate options being severely limited. To ensure that education is delivered in a way that is safe and appropriate for all pupils, we would recommend increased consideration of cultural elements, as well as the need for translated materials.

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?

No. While the Bill introduces important measures aimed at preventing reoffending and improving the management of domestic abuse perpetrators, we hold significant concerns surrounding the complete lack of direct provisions to support victim-survivors. The current draft focuses heavily on offender management – such as notification requirements, behavioural assessments, and data collection – without addressing the urgent and ongoing needs of those who have experienced domestic abuse.

Victim-survivors often face significant barriers when fleeing abuse, including homelessness, poverty, and legal vulnerability, yet these issues are not addressed in the current proposals. The Bill provides no tangible support mechanisms for individuals affected by domestic abuse, including a lack of access to safe housing, trauma-informed counselling, financial assistance, or legal advocacy. Although the Bill proposes collecting demographic data from victim-survivors, this is primarily for statistical purposes and does not translate into service provision or enhanced protections.

In addition, we recommend that the Bill include provisions for mandatory or discretionary notification to victim-survivors, particularly in cases where the offender becomes subject to notification requirements or is released from custody. This would allow victim-survivors to take protective steps, access support, and feel reassured that monitoring is in place. Notification should be coordinated through multi-agency arrangements and offered on an opt-in basis, respecting the autonomy and safety needs of each individual. Including this measure would align the Bill with trauma-informed practice and ensure that public protection efforts are not solely focused on offender management, but also on empowering victim-survivors.

The absence of support measures risks creating a one-sided approach, where the rehabilitation of the offender is prioritised, without ensuring the safety, recovery, and empowerment of women and children harmed. To ensure a balanced and effective response to domestic abuse, the Bill should be amended or supplemented with a parallel strategy that guarantees access to support services, including housing, mental healthcare, and legal aid. It should also include funding for third sector organisations, that currently provide these supports.

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

To strengthen support for victim-survivors, children, and families affected by domestic abuse, the Bill should be complemented by a robust framework of

practical, trauma-informed support measures. The current draft focuses on offender management, lacking provisions which will directly address the needs of those experiencing/have experienced abuse. A more holistic approach is therefore required to ensure that safety, recovery, and long-term wellbeing of victim-survivors are centred.

Firstly, guaranteed access to safe and secure housing is integral to a domestic abuse strategy. Victim-survivors often face homelessness or housing insecurity when fleeing abusive environments (Scottish Women's Aid, 2020), and without dedicated pathways into emergency accommodation and long-term housing, many are forced to remain in unsafe situations. This is particularly critical for families with children, who may be uprooted from schools and support networks.

• "I'm a domestic abuse worker...it's nigh on impossible to speak to housing departments and say that someone needs to be moved as a matter of priority. It's impossible."

Additionally, the Bill should include funding for trauma-informed mental health services, including counselling and psychological support tailored to the needs of both adults and children. Domestic abuse has long-term emotional and developmental impacts, with recovery requiring sustained access to therapeutic care (Scottish Women's Aid, 2016). These services should be embedded within community settings and coordinated with social work and third-sector organisations.

• "I cannot emphasise enough the impact domestic abuse has. I was able to escape my abusive marriage, but I left with no money in my bank account. I have PTSD as a result of the historical and post-separation abuse, which has resulted in me losing my job. I also lost my home, so now I rely on benefits"

We would also recommend that legal advocacy and representation be strengthened. Victim-survivors often find navigating the justice system retraumatising and complicated. Measures such as automatic access to special protections in court, legal aid, and advocacy workers can significantly improve their experience and outcomes.

- "...too many women who experience rape/sexual assault/domestic violence often feel that they are traumatised by their experience in court; if the case is taken to court."
- "I think it takes far too long for violence against women cases to get to court and that retraumatises them."

Moreover, the Bill should support the expansion of multi-agency partnerships, including social work, education, health, and third-sector organisations. These partnerships should be resourced to provide coordinated wraparound support for families, including early intervention and prevention work. Criminal justice social workers in particular, should be supported to work, not only with perpetrators, but also in safeguarding and supporting affected families.

Finally, we propose that provisions are made to commit long-term funding for specialist domestic abuse services, including those led by and for marginalised communities. These organisations provide culturally competent and survivor-led support that is essential for reaching those who may not engage with statutory services. Yet, many third sector workers face increased burn-out and vicarious trauma, resulting in staff reductions and the inevitable closure of services. Through long-term funding, domestic abuse provision can be strengthened and made sustainable.

By embedding these measures into the legislative framework, the Member can ensure that the Bill delivers meaningful change, not only in preventing reoffending, but in supporting recovery and resilience for those most affected.

References:

Scottish Women's Aid. (2016). Health and Domestic Abuse. Available at: https://womensaid.scot/wp-content/uploads/2017/09/HealthDomesticAbuse.pdf

Scottish Women's Aid. (2020). Improving Housing Outcomes for Women and Children Experiencing Domestic Abuse. Available at:

https://womensaid.scot/wp-content/uploads/2020/12/Improving-Housing-Outcomes-for-Women-and-Children-Experiencing-Domestic-Abuse-Report.pdf

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?

No answer given.

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)?

No answer given.

8. Practical Considerations and Resources

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

No answer given.

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

No answer given.

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?

While consulting with women in Scotland, the need for improved legislation to tackle misogynistic behaviour has been consistently raised. Many have expressed that cultural change is essential to preventing domestic abuse in the long-term. Although the Misogyny Bill is not directly part of this consultation, we note that its introduction remains a key ask from women across Scotland. Embedding such legislation alongside the Prevention of Domestic Abuse (Scotland) Bill could help address the societal attitudes that enable abuse and strengthen Scotland's overall approach to violence against women and girls.