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Deputy Prime Minister
cc. Permanent Secretary of the Ministry of Justice

Sent by email

24 January 2021

Dear Deputy Prime Minister,

Copied to the Permanent Secretary of the Ministry of Justice

Victims Bill Consultation: Access and participation from Deaf and disabled communities

As the Commissioners for Domestic Abuse and Victims in England and Wales we share your high ambitions for the Victims Bill, and welcome the launch of the consultation before Christmas. This Bill has the opportunity to be truly transformative for victims of crime, and we hope to continue to work closely with you and your officials to make this a reality. To that end, we have previously written to ask for an extension to the consultation to enable front-line services, who have been delivering life-saving work during the Covid-19 pandemic, to participate in this important work, and lend their expertise and advice to the process. We understand that a decision has not yet been taken on this overall point, but in particular urge you to consider an extension for responses from Deaf and disabled communities.

We have grave concerns about the efficacy of a consultation process that is not accessible to Deaf and disabled people. We know from the Crime Survey of England and Wales that disabled women are three times more likely than non-disabled women to experience domestic abuse. And yet Deaf and disabled communities can

face some of the most significant barriers to accessing support, as well as barriers in accessing the criminal justice system. Often, it is only specialist 'by and for' services, run by and for Deaf and disabled people, that are able to meet the specific needs of these groups of victims and survivors.

It is therefore critical that Deaf and disabled people are able to fully access and contribute to this important consultation. We know that a British Sign Language version of the consultation was published on 19th January, alongside an HTML version which is accessible to screen-readers. Maintaining the deadline of 3rd February gives just two working weeks for a response. We would therefore strongly recommend that the deadline for individuals and organisations who need these versions to be extended to 16th March; 8 weeks after publication. This would mirror the 8 weeks afforded to individuals and organisations who did not require an accessible version, and is what we would expect in line with Public Sector Equality Duty.

To provide some context, we have previously had to write to the Home Office about the accessibility of their Violence Against Women and Girls Call for Evidence in November 2020, and are concerned that this appears to be an issue shared across Government Departments. The lessons from this process do not appear to have been learnt, and therefore we would welcome a follow-up discussion with the Permanent Secretary to ensure that policymaking across the MoJ recognises the value of contributions from Deaf and disabled representatives in the future. In our letter to the Home Office last year we called on the Department to invest in specialist training, and the resources and time needed to facilitate meaningful and inclusive consultation processes. We repeat that call to the Ministry of Justice.

Without an extension, Deaf and disabled representatives will be once more shut out of policymaking, on an issue that disproportionately affects their communities. The Victims Bill will be poorer for it.

As ever, we stand ready to work closely with you in any way to support our shared aim that Deaf and disabled voices are fully represented in policy development.

Yours Sincerely,



Nicole Jacobs

Domestic Abuse Commissioner for
England and Wales



Dame Vera Baird QC

Victims Commissioner for England and
Wales