

Consultation: Prevention of Domestic Abuse (Scotland) Bill

Zero Tolerance for the Scottish Government, 11 September 2025

1. Notification requirements and monitoring of Domestic Abuse Offenders

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?

This proposed prevention Bill focuses almost exclusively on secondary and tertiary prevention, apart from part 4, which focusses on school education. Zero Tolerance is Scotland's expert organisation on the primary prevention of men's violence against women and girls (VAWG). Primary prevention is a long-term strategy to prevent violence before it starts by addressing its root cause – gender inequality. The monitoring of convicted perpetrators of domestic abuse is not primary prevention. Therefore, defer to our colleagues at Rape Crisis Scotland and Scottish Women's Aid, who are experts in support services and justice reform.

2. Risk Notifications

The Disclosure Scheme for Domestic Abuse Scotland 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?

This proposed prevention Bill focuses almost exclusively on secondary and tertiary prevention, apart from part 4, which focusses on school education. Zero Tolerance is Scotland's expert organisation on the primary prevention of men's violence against women and girls (VAWG). Primary prevention is a long-term strategy to prevent violence before it starts by addressing its root cause – gender inequality. Adopting disclosure schemes is not primary prevention. Therefore, we defer to our colleagues at Rape Crisis Scotland and Scottish Women's Aid, who are experts in support services and justice reform.

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?

This proposed prevention Bill focuses almost exclusively on secondary and tertiary prevention, apart from part 4, which focusses on school education. Zero Tolerance is Scotland's expert organisation on the primary prevention of men's violence against women and girls (VAWG). Primary prevention is a long-term strategy to prevent violence before it starts by addressing its root cause – gender inequality. The rehabilitation of convicted perpetrators of domestic abuse is not primary prevention. Therefore, we defer to our colleagues at Rape Crisis Scotland and Scottish Women's Aid, who are experts in support services and justice reform.

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?

This proposed prevention Bill focuses almost exclusively on secondary and tertiary prevention, apart from part 4, which focusses on school education. Zero Tolerance is Scotland's expert organisation on the primary prevention of men's violence against women and girls (VAWG). Primary prevention is a long-term strategy to prevent violence before it starts by addressing its root cause – gender inequality. Data collection is not primary prevention. Therefore, we defer to our colleagues at Rape Crisis Scotland and Scottish Women's Aid, who are experts in support services and justice reform.

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?

Zero Tolerance is Scotland's expert organisation on the primary prevention of men's violence against women and girls (VAWG). We tackle the root cause: gender inequality.

VAWG is violent and abusive behaviour carried out predominantly by men directed at women and girls precisely because of their gender (Scottish Government, 2023). This behaviour stems from systemic, deep-rooted gender inequality, and includes domestic abuse (Scottish Government, 2023; The Improvement Service and Zero Tolerance, 2019). Domestic abuse does not exist in a vacuum - it is part of a wider system. Domestic abuse is one form of VAWG, and all forms of VAWG share the same root cause: gender inequality. Therefore, effective prevention of domestic abuse must tackle the wider system of gender inequality. Indeed, since domestic abuse so often involves other forms of VAWG such as sexual assault, stalking, 'revenge porn' and sexual exploitation, it is not possible to educate about domestic abuse without addressing VAWG as a whole.

Zero Tolerance's expertise in primary prevention is built upon over 30 years of experience, a robust evidence-base, and is firmly grounded in feminist theory and practice. Our approach to primary prevention tackles VAWG at its root – gender inequality. It is a long-term strategy to prevent violence from ever happening in the first place by challenging the attitudes, behaviours and structures that underpin and sustain this violence and abuse (García-Moreno et al., 2015; Kerr-Wilson et al., 2020; Jewkes et al., 2021).

Zero Tolerance does not believe that this Bill should pass in its current form. We have significant concerns that the Bill is entitled 'Prevention' when most of the measures suggested will not prevent domestic abuse. This proposed prevention Bill focuses almost exclusively on secondary and tertiary prevention, intervening after violence has occurred, apart from part 4, which focusses on school education. These forms of prevention, while necessary, can at best only manage levels of VAWG. We want to see the government demonstrating its ambition to end VAWG by investing in primary prevention. In the sections below, we lay out how this section of the Bill could be modified in a future draft.

Zero Tolerance strongly believes in education as one tool in the toolbox for prevention. However, education-based approaches must sit in the context of a much more holistic prevention strategy.

Relationships, Sexual Health and Parenthood (RSHP) Education:

We take issue with the premise of “domestic abuse education” and believe it risks causing harm to young people. Instead, we call for comprehensive, statutory RSHP education.

In the policy memorandum for this Bill, it is stated that the purpose of this domestic abuse education is to “raise understanding and awareness of domestic abuse and facilitate a longer-term cultural shift necessary to prevent domestic abuse in Scotland”. However, there is no evidence to suggest that educating young people about the existence of domestic abuse changes culture or behaviour, prevents domestic abuse or reduces the rates of domestic abuse.

To be very clear, educating men and boys on what domestic abuse is, does not prevent them from perpetrating domestic abuse. It is overly simplistic and unevidenced to suggest that men and boys will stop committing VAWG once they are taught that it is VAWG. It is also insensitive to suggest to victim-survivors that their perpetrators may have only committed violence because they simply did not know it was violence. Furthermore, it is not the responsibility of young women and girls to learn about domestic violence in order to protect themselves from it. For these reasons, we oppose the premise of “domestic abuse education” in school, as it does not serve the purposes of prevention and could cause further harm to survivors-victims.

Instead, broader relationships and sexual health education, focused on gender equality, consent and healthy relationships, should have a place in a Bill which seeks to prevent any form of VAWG.

Research shows that strengthening positive, equal, and respectful relationships across all levels of society is essential for effective prevention (Our Watch, 2021). Comprehensive RSHP education that is gender transformative (critically examines and challenges harmful gender norms and promotes positive alternatives) develops learners’ understanding of healthy relationships and consent (Scottish Government, 2024b; RSHP Scotland, 2025). Indeed, the UN advises that a children’s rights-based approach to RSHP is essential:

‘Providing young people with equal access to [comprehensive sexuality education] respects their right to the highest attainable standard of health, including safe, responsible and respectful sexual choices free of coercion and violence, as well as their right to access the information that young people need for effective self-care’ (UNESCO, 2018: 16).

We are calling for statutory RSHP education focused on gender equality, consent and healthy relationships.

Statutory RSHP with children’s rights in mind:

It is stated in the Bill's policy memorandum that "part 4 is intended to ensure provision across Scotland as standard." However, providing parents with the option to withdraw their children from this education does the opposite of ensuring consistent provision.

While a parent's right to withdraw their child is made clear in the policy memorandum, children's rights are not sufficiently embedded. UNCRC – which is now law in Scotland – is clear that children have the right to education and information. Children's right to learn about topics covered in RSHP is just as important as parents' right to withdraw their child. For example, young women and girls of all faith backgrounds in Scotland are currently being disadvantaged due to their parents disproportionately opting them out of preventative RSHP education (Scottish Government, 2025). The Bill must be clear that children have a right to RSHP.

It is also important to note that in Scotland, over four-in-five (81%) incidents of domestic abuse involve a female victim and a male suspected perpetrator; many of these men are fathers (Scottish Government 2024c). Providing these men the power to opt their children out of preventative education is alarming and disadvantages these children and young people.

We are calling for statutory RSHP for all children in Scotland, and for children's right to education and information to have equal weight with parents' right to withdraw their child.

Inclusion:

Younger pupils and disabled pupils are currently excluded from accessing the preventative education proposed in this Bill, and there is no consideration of what access provisions might be made for racialised pupils and LGBT+ pupils. Effective RSHP starts young, with age-appropriate content for children including learning about asking consent for a hug and respecting their friends laying the foundation for content about sexual and romantic relationships which will come later. To be effective, it must also respond to the specific needs of racialised and LGBT+ pupils.

It is vital that disabled pupils are included in RSHP provision. Evidence shows that women with learning disabilities are at particularly high risk of 'severe, frequent and repeated' gender-based violence (SCLD, 2023: 88). Disabled girls are targeted by abusers because of specific vulnerabilities at the intersection of gender, disability and youth (Zero Tolerance, 2024). RSHP is cited by women with learning disabilities themselves as an essential preventative action (SCLD, 2023: 89; Zero Tolerance, 2024).

We are calling for RSHP that is available for all pupils aged 3-18, including disabled pupils.

Whole School Approaches:

It is concerning that a whole school approach is not proposed in this bill, as RSHP education is only effective at preventing VAWG when incorporated within the context of a whole school approach. The Bill states that domestic abuse support charities should be consulted about this education, so it is worth noting that expert VAWG organisations, including Rape Crisis Scotland, Scottish Women's Aid, and Zero Tolerance, have been involved in the development of whole-school approaches currently in use in Scotland. A whole-school approach involves embedding gender equality across curriculum, all staff training, school culture and policies, and engagement with parents and the wider community (Nevens et al, 2021).

Research demonstrates that whole school approaches and accurate, inclusive, and consistently delivered RSHP can prevent men's violence against women and girls in entire communities. Importantly, a whole school approach takes into account the attitudes and behaviour of the adults who work and volunteer in the school setting, as well as encouraging parents and carers to be involved in prevention. In this way responsibility for preventing violence against women and girls is shared by the whole school community, and not seen as a problem specific to, and wholly the responsibility of, young people.

As noted, Scotland already has Equally Safe at School (a supported programme for schools to take a whole-school approach to prevention) and the Gender Based Violence in Schools Framework (Scottish Government guidance on preventing and responding to gender-based violence). These two approaches are complementary, and this Bill could play a useful role in putting these on a statutory footing, meaning that they would be well resourced to be implemented meaningfully at a local level.

We are calling for the funding, resourcing and meaningful implementation of whole school approaches to gender equality in all schools in Scotland.

Broader Investment in Primary Prevention:

However, well-designed and implemented school-based interventions focused on gender transformation only contribute to broader prevention efforts when integrated into a national strategy (Kerr-Wilson et al., 2020).

The only way to eliminate domestic abuse is to invest in primary prevention – work which seeks to address the social structures, culture and attitudes which drives this violence. To effectively embed prevention, by addressing gender inequality, work must also be done to ensure that women have access to money, resources, decision

making, respect and social power (Engender, 2023). These are the key aspects of gender inequality which drive all forms of men's violence against women and girls, including domestic abuse and so government policy and strategy must embed gender equality coherently across all portfolios, not just those that explicitly address inequality and violence.

We are calling for broader social investment in primary prevention of VAWG.

Summary:

In sum, we cannot support part 4 of this Bill in its current form, as we have evidenced concerns that the suggested methodology for education in schools within this proposed Bill as it is not prevention, and it is exclusionary, ineffective, not rooted in any research or evidence, and has the potential to cause children and young people serious harm. Domestic abuse does not exist in a vacuum - it is part of a wider system. Domestic abuse is one form of VAWG, and all forms of VAWG share the same root cause: gender inequality. Therefore, effective prevention of domestic abuse must tackle the wider system of gender inequality.

We are calling for any future Bill on domestic abuse prevention to:

- instate statutory RSHP for all pupils 3-18 years old, regardless of background or ability;
- ensure that RSHP is nationally consistent, focused on gender equality, consent and healthy relationships, and sits within a whole school approach;
- recommend broader social investment in primary prevention of VAWG.

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5.2. At what age should this education begin?

In the policy memorandum for this proposed bill, it is stated that part 4, which concerns school education, "would not cover nursery schools... the Member envisages the education provided to be focussed on secondary schools". We cannot support this, as evidence clearly demonstrates that promoting the primary prevention of VAWG is vital throughout early years, primary, secondary, further and higher education (The Improvement Service and Zero Tolerance, 2019). At early years and primary level, preventative approaches include counter-acting gender stereotypes, teaching children the basics of consent (e.g. asking consent for hugs or high fives), and supporting them to develop healthy friendships. These skills provide the foundation for discussions about romantic and sexual relationships at secondary school age.

This is evidenced in the thorough and numerous research projects that Zero Tolerance has conducted, for example:

- Zero Tolerance & Care Inspectorate, Gender Equal Play in Early Learning and Childcare (2018), a resource to help ELC practitioners enhance gender equality for children across all ELC settings, available here: <https://www.zerotolerance.org.uk/resources/Genderequal-play-in-early-learning-and-childcare.pdf/>
- Zero Tolerance, Just Like a Child, a guide to preventing gender stereotyping in the early years is aimed at childcare professionals who work directly with very young children and who are in contact with their parents and carers, available here: <https://www.zerotolerance.org.uk/resources/Just-Like-a-Child.pdf>

- Zero Tolerance, Anyone Can Play, a suite of resources for how to talk to people about gender stereotypes and their effect on children, available here: <https://www.zerotolerance.org.uk/anyone-can-play-landing/>
- The Gender Friendly Nursery is an early years primary prevention strategy which was piloted in the northeast of Glasgow and developed in partnership between Health Improvement and Zero Tolerance, Respect me, LGBT Youth Scotland, Men in Childcare and Fathers Network Scotland, available here: <https://www.stor.scot.nhs.uk/server/api/core/bitstreams/44131600-a846-44eb-b243-7dad103dcd1e/content>

We are calling for gender transformative RSHP for all pupils from the ages of 3 to 18 years old.

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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.

7.2. Are there groups of people who might be affected in ways that should be carefully considered (e.g. racialised communities, disabled people, LGBTQ+ people)?

Proposals in this Bill disadvantage underserved groups from accessing preventative education.

We are deeply alarmed that disabled pupils are explicitly excluded from the school education proposed in this Bill. In the explanatory notes for this Bill it states that the definition of school does not include “a special school providing education specifically suited to the additional support needs of children or young persons”. It is discriminatory to suggest disabled pupils should not be provided with preventative education on the basis of their support needs or what school they attend. This proposal is especially troubling, as disabled girls are more likely to experience VAWG than those who are not disabled (Nevens and Hutchison, 2024). This is exacerbated by the fact that disabled pupils are already missing out on RSHP education in Scotland as provision of RSHP in additional support needs schools is significantly

less than in mainstream schools (Engender, 2018; Scottish Human Rights Commission, 2023).

More widely, there is no reference or commitment to intersectionality within this proposed Bill, including no reference to LGBTQIA+ pupils, or what access provisions might be made for racialised pupils. Current programmes are not adequately meeting LGBTQI+ young people's needs (LGBT Youth Scotland, 2023). This is a stark omission, as multiply marginalised girls, who are at particularly high risk of VAWG, are often not accessing vital information about consent, their bodies, and their rights (Nevens and Hutchison, 2024). This exposes young people to risky decision-making, worse health outcomes, unplanned pregnancies, lack of respect in personal relationships, and a poor understanding of consent (Public Health England, 2019; Scottish Government, 2024; RSHP Scotland, 2025).

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For Further Information

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About Us

Zero Tolerance is a Scottish charity working to end all forms of men's violence against women by tackling its root cause: gender inequality.