



Policy recommendations for an effective quality assurance process of standards implementation in perpetrator

programmes



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1. Introduction

The European Network for the Work with Perpetrators of Domestic Violence (WWP EN) is dedicated to protect violence survivors through promoting and encouraging effective and accountable work with perpetrators of violence, mainly men. WWP EN's activities focus on building capacities of perpetrator programmes and professionals, but also on providing guidance and recommendations for quality and safe work. Through number of years working in the field we have witnessed growth and development of practices, in all its varieties. We have also witnessed unbalanced practices between organizations and countries, some of them being critical, and not aligned with international standards (the Istanbul Convention, WWP EN's Guidelines for Standards). There is an emerging need to provide not only standards, but also a system for assuring the implementation of standards in the work with perpetrators.

WWP EN is taking a great step forward in ensuring accountable perpetrator work through the development of a European Accreditation System for Perpetrator Programmes. This system aims to serve as an encouragement for perpetrator programmes to develop, grow, and guide them on the way. It also aims to promote and validate good practices, make them more visible and reinforce quality work. Likewise, it aims to provide reliable criteria for governments, international agencies and funders for making strategic and funding decisions.

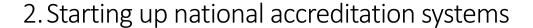
However, setting up this much needed system is a challenging task that carries a lot of responsibility and that needs to take into account existing differences across Europe in the number of criteria, geographical scope and socio-cultural factors. It is also the case that most European countries do not have an accreditation system. The only two robust accreditation systems that we were aware of are systems implemented in the UK by RESPECT, and in Germany by BAG TäHG. Their expertise and experience is a highly valuable guidance for designing a model for a European Accreditation System for Perpetrator Programmes.

This document is based on two guidance documents written by Daniela Hirt from BAG TäHG and Alistair Sherlock from RESPECT. Parts of these documents were integrated and restructured, so that they form a comprehensive policy recommendation.

This document provides recommendations on key aspects of setting up a European Accreditation Model for Perpetrator Programmes, existing challenges and proposed ways forward.







2.1. Respect

The Respect Standard was initially developed in 2008 with the accreditation process following in 2012. The initial work undertaken was developed in consultation with the specialist domestic abuse (DA) sector. Prior to that time there was an absence of a formalised set of practice standards in the UK although it should be noted that many of the key aspects of the work being delivered were informed by the Duluth model and a gendered analysis of DA. A central component within the standard was and is the recognised need when engaging with perpetrators for a parallel Integrated Support Service (ISS) to engage with survivors and victims of domestic abuse. This not only supports more accurate risk assessment and monitoring but ensures survivors also receive a service to address their own experience of harm and needs.

Interventions with perpetrators in the UK developed around a model of structured groupwork, primarily aimed at men who would be assessed as posing a medium level of harm. Whilst these programmes often had the flexibility to be delivered on an individual basis, the groups approach was preferred. This was and is consistent with interventions for perpetrators of domestic abuse in many other countries. The Respect Standard 3rd Edition¹ launched in 2017 began to allow for other types of interventions aimed at higher risk and high need perpetrators as well as earlier intervention where awareness raising was the focus. Each of these cohorts of clients required a different approach. Respect's own involved in the development and delivery of these new models of work can be seen through the Drive Project², Make a Change³ and Change that Lasts⁴. The challenge for any accreditation system is its ability to reflect current thinking and to be applicable to a broad spectrum of interventions and geographical contexts.

The existence of standards not only allowed for stakeholder confidence in the sector but also brought practice and delivery into greater alignment. Historically the accreditation was of particular value to Non-Government Organisations (NGOs) and the design of the standard represents this in its current and previous forms.

⁴ A partnership with Welsh Women's Aid https://www.respect.uk.net/pages/59-change-that-lasts





 $^{^{1}\} https://hubble-live-assets.s3.amazonaws.com/respect/redactor2_assets/files/105/Respect_Standard_FINAL.pdf$

² A partnership between Respect, Safe Lives and Social Finance http://driveproject.org.uk/

³ A partnership with Women's Aid Federation England https://www.makeachange.uk.net/



Work with perpetrators of domestic violence was not carried out in a uniform manner across Germany. There was no uniform, mandatory guideline for working with perpetrators of domestic violence (DV) that ensures the quality and structure of work. In order to guarantee the quality of work with perpetrators in Germany as required by the Istanbul Convention, the BAG TäHG has drawn up and adopted a standard for working with perpetrators of domestic violence.

In 2014, the BAG TäHG adopted a guideline for the certification of member institutions. With the help of the certificate, the BAG TäHG uses a catalog of criteria and an on-site inspection to ensure that the certified facility works in accordance with the BAG TäHG standard and that all areas of work, documentation, compliance with data protection and supervision are met. The certification is valid for 3 years, after which a re-certification (using the simplified procedure) must be completed. In 2017, the first facility was certified in a pilot process. The accreditation ensures compliance with the standards of the BAG TäHG in the work with the perpetrators of DV in the respective facilities.

The overall process of the accreditation process from the application to the Federal Ministry for Family Affairs in Germany to the final completion of the manual and the accreditation process took about three years. A lot of voluntary, unpaid work has been done through the board of BAG TäHG.

3. Accreditation Process

3.1. Respect

Services seeking accreditation must satisfy each and every standard in Section A, B, C and D of standards. The standard itself contains a description of each standard alongside a short guidance outline. The role of the assessor is to capture evidence from the service and to populate a report template. This template is also the method through which feedback is provided to the service. Where the standard is "met", feedback may only outline positive information captured. Where the standard is "not met" the assessor must provide feedback on why the evidence does not meet the criteria.

The current accreditation process is outlined as follows:

1. Application and Contracting

Services seeking accreditation complete an online application, this covers the number of interventions, staff in the service and locations where the service is available. An assessor will contact the service and discuss costs. Alongside the cost of accreditation, the contract also outlines information sharing protocols & confidentiality, disputes and complaints. Initial dates for documentation submission and the site visit are also agreed and referenced in the







contract. If the service fails to meet these dates additional charges may be applied and these charges are outlined in the contract.

2. Desktop Submission

The first part of the assessment process is for the service to gather supporting information and evidence (policies, procedures, models of work, evaluation evidence and marketing materials). They also complete a submissions template which outlines how they meet the standards and can also include a short narrative. This information is reviewed by the assessor as part of the assessment but also informs the preparation and planning for the site visit.

3. Site Visit

The second aspect of the assessment is to undertake the site visit, this is where the majority of the evidence to assess against the standard is captured. The assessment in this phase focuses on interviews with staff members (practitioners and managers), a case file review as well as evidence of HR processes and any practice management in place.

Where services are delivered in a partnership, for example the ISS for survivors is held by a specialist survivor service, they too will need to be part of the assessment process and be available to meet with the assessor.

4. Feedback and Review

After collating all of the information captured through the site visit and desktop review, a report is produced which outlines the evidence available and whether this has met the standard or not. Services who complete the process with no development points would proceed to a review by the Respect Accreditation Panel. Those with development points are given a development plan and a 3 month window within which to implement the changes.

5. Respect Accreditation Panel

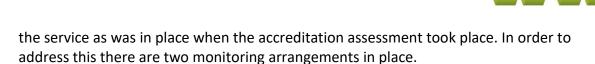
The accreditation panel is comprised of a nominate chair and two further independent panelists. All of those on the panel have experience in the specialist domestic abuse sector and ideally in work with perpetrators. Respect also seeks to have panellists from other accrediting bodies in the sector such as Safe Lives, Women's Aid Federation England and Welsh Women's Aid. The panel reviews all of the assessments as well as any complaints received about accredited services. Their role is to scrutinise the reports and the information presented. The panel can set additional tasks for the assessor or make seek further clarification from a service if the information is not satisfactory or clear enough. Accreditation is awarded for three years.

6. Monitoring and Complaints

Where accreditation is awarded for a period of three years Respect recognises that services can undergo significant changes in this time which may impact upon their ability to deliver







Annual Returns: Each service is asked to produce an annual return. It asks the service to identify basic information such as client throughput alongside referencing new contracts, partnership working and changes to service delivery.

Bi-annually Respect also undertakes a "Standard Spot-check", typically this is informed by complaints we have received but this recently developed spot-check focuses on a particular standard and it is required that all services submit a narrative or a document as evidence as to how they currently meet that standard.

Complaints: As an accrediting body Respect manages complaints regarding accredited members. Respect's role in complaints investigation is to explore if, in the delivery of a service any of the standards have failed to be adhered to. Complaints investigations are not common but they do inform an important part of the ongoing monitoring of services.

3.2. BAG TäHG

There are so-called hard points in the examination criteria (implementation of recommendations of official requirements, cooperation, anamnesis, further surveys, documentation, processes at the administrative level, distribution of tasks in multi-professionality). Softer criteria are, for example, accessibility. Examination criteria include:

- Cooperation structures (communication from the cooperation institutions on cooperation with the PW institution)
- Processes such as annual reports, statistics and data protection
- Procedures for admission, diagnostics, documentation and evaluation
- Content work according to the standard
- Qualification of personnel (training and specialist training/further education, participation in supervision)
- Accessibility
- Public relations (website, flyer or other publicity material of the institution)

These criteria are checked on the basis of templates, files and discussions.

The accreditation process has several steps:

- The PW facility requests the certification documents from the BAG T\u00e4HG office.
- 2. The PW institution receives the application documents: registration for certification, information sheet on the certification process, questionnaires about the institution and the staff, checklist of the documents to be submitted.
- 3. The institution sends the complete documents to the BAG office. At the same time, the PW institution transfers the 1st instalment of the certification fee of 100 € for the

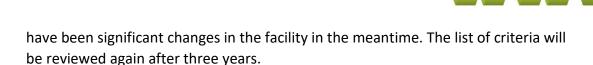




- preliminary examination. Regardless of the result of the examination, fees paid cannot be reimbursed.
- 4. After receipt of the complete documents and payment of the contribution to the costs (100 €), the office sends the documents to the responsible curator after consultation with the executive board of the BAG.
- 5. After checking the content of the application documents, the curator will contact the PW institution, which will then transfer the second instalment of the fees of 850 €. An appointment is made to visit the PW facility. Individual points may be discussed in advance by telephone.
- 6. In a facility visit by the curator, the facility is checked according to the national PW standards and the standards for certification. If necessary, the necessary target agreements are made, which are checked by the curator. The facility visit includes the following:
 - a. Interview with the head of perpetrator work facility (at least 1 hour)
 - b. Discussion of the questionnaire
 - c. Comparison of conception and standards
 - d. Development potential
 - e. The curator's impressions of future development steps
 - f. Interview with the team (at least 1 hour)
 - g. Description of the course of the case
 - h. Description of role allocation/ group design
 - i. Dealing with relapses
 - j. Viewing rooms
 - k. Examination of file storage
 - I. Viewing 3 files (closed/ not closed case)
- 7. The curator creates a standardized report on the facility and sends this and any proposed target agreements to the BAG TäHG office within four weeks. The PW facility receives a copy.
- 8. The office sends the curator's report to the board of the BAG, whose certification commission decides on the application in the next meeting.
- 9. If the commission has decided positively on the institution's application, the BAG TäHG awards the institution the seal of approval. The office includes the facility in the list of certified facilities and publishes this on the BAG TäHG homepage.
- 10. The institution may advertise with the logo of the BAG certificate for three years. An extension usually takes place in a simplified examination procedure, unless there







4. Good practice

Elements of good practice are:

- Robust Assessment. The process of assessment is robust and does look holistically at services. The strength of the process in terms of evidence lies in the scrutiny of case files. For many services this is not always an area of strength and the assessment provides an opportunity to develop this aspect of service delivery. Any credible and defensible accreditation process must incorporate a file review component.
- Service Development. Whilst services seek accreditation and the main focus is the assessment, experience strongly points to there being a significant developmental aspect to the process. The standards reflect best practice. Where services are not meeting the standards and then go on to develop their service to meet the requirement, we see an overall improvement in the delivery and management of the interventions. Feedback from services who have gained accreditation affirm that this was one of the main benefits to them.
- Relationships. As a membership organisation, the accreditation process provides an opportunity to form strong relationships with member services. An assessor may spend several days throughout the process with a service and this allows Respect an opportunity to form positive and lasting relationships with its members. This relationship is also a necessity from experience when giving feedback and formulating any development plans required. What it does means is that it is essential to choose the correct assessors who not only have the skills and knowledge to be an assessor but there is also an importance to the philosophy of the approach. For Respect the assessment is also an investment in a relationship.
- Linking with funding sources. The certification of the PW facility is already very much welcomed by individual federal states in Germany and is included as a condition in the first tenders for the financing of PW facility. (In Bavaria, for example, the draft tender for the state funding of specialist agencies for work with perpetrators intends that the facilities must be certified.) It can be assumed that the other federal states will follow this example.
- Having an accreditation body, like the Respect Accreditation Panel in the UK, or the Board of Trustees in Germany that involves perpetrator program professionals and survivor support services.





5. Existing challenges and proposed ways forward

- **Keeping track of changing intervention approaches**. As the perpetrator sector in the UK has changed and evolved the need to have a current and relevant set of accreditation standards requires ongoing investment. Whilst one approach might be to have much broader and general set of standards or principles in place for interventions, this misses the opportunity to set standards which recognise best practice in differing approaches to intervention. For example, the quality assurance and practice management approaches in an intensive case management model might not be appropriate for that where structured intervention is delivered and vice versa. The 4th Edition of the Respect Standard (currently in development) will see the first attempt at having specific standards for specific types of intervention as opposed to amalgaming many needs into a single shared standard. This allows Respect Accreditation to continue to set high standards which are specific. Given the broad application of a European-wide set of standards, this will inevitably be a challenge.
- Pace of assessment. Investment in a pre-screening and readiness assessment is essential. Respect has experienced challenges completing assessments with services who were simply not ready to undertake the assessment. This culminates in there being too many development points to address in a short period of time. Until 2021 the assessment was broken into two stages, each taking up to one year to complete. In 2021 it was felt that services could, with greater focus and support complete this process in a single stage and within a twelve month timeframe. Where the accreditation assessment takes too long the service naturally will undergo a series of changes and transition such as new contracts and staff attrition. In these instances an assessor may have to revisit parts of the assessment which duplicates the work and this is difficult to factor into the costing model. Respect has found that costing accreditation assessments can be difficult and there may be hidden costs. To address this more robust contracts have been put in place which outline additional charges to ensure that where services need additional support or re-assessment site visits that this is factored in and communicated clearly.
- Scope of assessments. As greater funding has become available in England & Wales, the perpetrator sector has grown and innovated. A challenge that sits alongside the pace of the assessment is also the number of interventions being delivered can change. For example a service may deliver a group DAPP when they apply for accreditation but following application, they are commissioned to deliver a high risk of harm intervention, should the service now apply for this intervention to fit into the accreditation also? Respect recognises that the accreditation assessment should cover all intervention with perpetrators and not only a singular part. Currently it is a requirement to do this if the assessment is in process and incurs a cost but it is



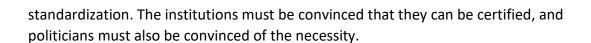


problematic and can result in delays to the assessment being completed. Ordinarily when a service is due to apply for re-accreditation the scope of the assessment would then capture any new interventions that have been added by the service over the previous 3 years. For Respect, this now is a significant part of the re-accreditation process, not only revisiting interventions but then looking at new ones which are now being delivered.

- Travel requirements. Until the Covid-19 pandemic, all site-visits were conducted in person. Not only does this incur a cost but the time needed to travel to services is variable and needs to be factored into the assessor expenses. In the European accreditation context this may be an even more significant challenge. Respect currently prefers assessments to be completed in person but a hybrid model could be considered where interviews with staff members are conducted online (especially useful where staff members may not all be based at a single location). Where services are in agreement, case files can also be viewed online alongside any HR documentation requested. The use of available technology would be a key component of delivering accreditation assessments for WWP EN.
- Confidentiality. All organisations sign a confidentiality agreement which outlines the management of data during the process. Where confidentiality is a challenge is where a lead organisation working with the perpetrator has a contracted out service for intervention with survivors. The file review component requires the standard for ISS are equally evidenced and some third parties are less inclined to grant assessors access to their files, nor do they have a confidentiality agreement with clients in place which allows the assessor access. This all takes time to resolve and whilst not insurmountable is an aspect of the assessment which can be problematic. Within a European accreditation system, one additional factor may be the different laws and legal requirements related to data protection and confidentiality although GDPR will cover many member services.
- Costs of the process. For many PW facilities, this is a sum that cannot be paid due to poor financing. In Germany, the cost of certification for the facility is 3.400 €, while in the UK it has a minimum cost of £6000 plus VAT. Additional models of work are costed at £3000 plus VAT.
- Varieties. Due to federalism in Germany, there are different state laws, budgets, political views and agendas in the 16 individual federal states. In addition, each PW institution functions individually due to different funding and histories. Thus, there are completely different prerequisites for the implementation of perpetrator work in the facilities. The checklist of the accreditation procedure is repeatedly checked, to see what the institutions can fulfill and what not. The results of the review (reporting) must be reintroduced to the Board of Trustees. Curators must have uniform forms for their report. Possibly with a small column "own explanation", otherwise no further scope for individual assessments in order to ensure







6. Recommendations for the development of a European Accreditation System

The countries in Europe are very different regarding history, politics, ethics and economical situation. So the accreditation, not only as a quality management tool but also as a political process, should consider the individual situation in the respective country. At the same time, victim safety must not be compromised in any country.

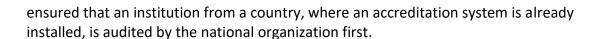
There are a number of key considerations in making this proposal, in some respects these become less about the standard itself because it is only one component part of the accreditation. As outlined the challenges for Respect are primarily the delivery of the assessments and keeping services focused on this as a task/development project. Naturally there is also a reputational risk to WWP EN which needs to be managed through monitoring and oversight.

Intervention vs. service vs. organisation? Respect elects to accredit services. Interventions and programmes need to meet certain criteria outlined in the Respect Standard but it is the wider service context which is as crucial to safe and effective practice with perpetrators and survivors which for Respect must be included in the assessment. The best and most up to date programme or model of work delivered by poorly trained staff with absent managers is not safe and therefore runs the risk of actually being a very poor programme. WWP EN needs to consider the dynamics of each approach to accreditation. Respect would advocate that any standards must cover the whole of the service and take into account the management and systems that the service is embedded within including training and development for practitioners. It then must consider how the service ensures its intervention can meet the needs of the local community and how the intervention is part of a multi-agency approach to tackling domestic abuse.

Develop the standard in consultation. WWP EN already holds significant experience and knowledge in the provision and development of interventions for perpetrators, but Respect would advocate for a consultation and working group to develop the final standards. WWP EN is currently undertaking a mapping exercise across its membership which should help identify the diversity of interventions on offer. Where this diversity is present the standards will need to have breadth and scope to remain applicable. A working group with representatives from different countries or regions would help input on local practices, dynamics and the nuance that often exists. It is essential that countries are actively involved in the process of developing the accreditation process. The establishment of a plenum like a specialist group appears to be a necessity for the development. Especially countries where an accreditation system is already installed should participate in such group and it has to be







Pre-Screening and Training. It is recommended that upon application, services are required to also submit a pre-screening tool. This tool would contain within it a service self-assessment and would evidence the readiness of the service to commence the process. For example, if it is a requirement of WWP EN standards to have an ISS in place then the service should confirm they do so. The tool can then inform any immediate developments that need to take place and whilst it could delay the overall application for accreditation it would in turn mean that when the assessment starts the service is in a greater place of readiness and the evidence gathering is more expedient as a result.

In 2021 Respect introduced fixed entry points for service applying for accreditation in April and October. All services are brought together into a group and can attend three "Accreditation Development Workshops". These workshops allow Respect the opportunity to share its learning from accreditation and provide detail on key areas that services may need to develop to meet the standard. It also allows the services to network with one another and for existing accredited members to meet with the group and give presentation on how they meet certain aspects of the standards. Whilst this is not training per se, WWP EN may find it beneficial when introducing the standards to deliver training on the requirements. From a Respect perspective these development workshops have cut down on the number of development points being identified on the site-visits and thus increased the pace of the process.

Assessment process. The most rigorous and informative aspect of the assessments conducted by Respect is the review of case files. This provides the richest evidence and can provide insight into strengths and challenges within a service which are not always apparent from staff interviews or the submitted documentation. It is a recommendation that any accreditation process includes a review of case files. This will present challenges and, in some instances, due to geographical considerations may not be possible if files cannot be viewed online.

This is a dynamic WWP EN will need to explore and resolve should they include a case files review in the process.

Having undertaken assessments in-person, online and a hybrid of the two, each approach has their own merits. It feels appropriate to propose that, where possible, remote/virtual site visit are conducted, as this is an efficient way of delivering the accreditation assessment, and limits costs and travel time for assessors. It may be that there is scope for an assessor who is local to a service to conduct the assessment in person, but it is not recommended in a European context to make this the default, unless there is a view that each country should have an appointed assessor.

Assessors. Respect recognises that WWP EN events are delivered in English. This may be a challenge for some services and so it is recommended that assessments are conducted in the local language. This also ensures that there is no risk of understanding and nuance being missed by the assessor when engaging with the service. It is envisaged that interviews with







practitioners would be a component part of the assessment and therefore establishing a clear and robust understanding of the services is more attainable with a shared language.

Monitoring and complaints. WWP EN will need to factor in how long accreditation is awarded for and therefore how they will monitor services who are accredited and ensure those standards are maintained following assessment. Naturally, for the WWP EN accreditation process to build stakeholder confidence there will need to be some consideration for how external parties can raise concerns or complaints about services if they believe the standard is not being maintained correctly.

Respect would advocate that WWP EN considers making the standard available on its website and that there is a mechanism for concerns or complaints about accredited services to be made. This will inform ongoing monitoring and help to build accountability and confidence. Additionally, the experience of Respect is that complaints and subsequent findings inform the re-development of the accreditation standard. In the development of the 4th edition of the standard the wording and guidance with some standards has been developed directly as a response to complaints.

Standards for work with survivors. The Respect Standard outlines in Section B4 a series of standards specifically for work with survivors that is an integrated part of the delivery model. It is recognised this integrated response to survivors is not funded or a component part of the delivery model in all contexts as it is in the UK. WWP EN should consider how survivor safety is at the centre of any accredited intervention. Whether responses to survivors and communication is internal or external does not need to be the deciding factor but the understanding a requirement for partnership and working alliance around between practitioners working with perpetrators and survivors is key.

6.1. Proposed structure

The proposed structure will be influenced by how WWP EN chooses to scope the assessment framework and whether it wishes to accredit interventions, services or organisations. The proposal is a framework focused on intervention and therefore is based on four strands. These strands could be incorporated into a wider framework. Each strand contains basic descriptors which will be developed into a broader set of standards but are not limited to this:





		Multi-Agency and	
Model of Work	Survivor Focus	Accessible Services	Partnership
Evidence based and	Interventions	Services can	Service can
outlines the target	consider risk to	reference and	demonstrate its
cohort of clients	survivors and	review their local	participation in
conort of chefits	children	demographic with	relevant multi-
Incorporates	Ciliuren	services matched to	agency meetings
assessment of risk	Engages specialist	identified needs	agency meetings
and need as well as	survivor service	identified fieeds	Has Information
the management of	provision with the	Assessments	Sharing Protocols
confidential data	model to manage	capture protected	with local partner
Commucintial data	risk and support	characteristics and	services
Regularly reviews	needs	work with clients to	3CI VICC3
clients risk and	liceus	make intervention	Works alongside
engagement to	Services must	accessible	statutory and non-
ensure the service	consider risk to	decessione	statutory provision
responds to present	survivors when	Staff are trained to	to safeguarding
levels of harm as	making decisions on	meet the spectrum	survivors and
well as how	perpetrator	of diverse need in	children
intervention may	participation in	their communities.	Cimaren
change to manage	intervention	Including ongoing	Raises awareness of
risk	c.remeion	monitoring of their	domestic abuse in
	Recognises there	practice	local communities
Considers how to	may be multiple	practice	and has accessible
manage clients	current and previous		referral pathways
enrolled in the	partners at risk and		for public and
intervention	seeks to risk manage		professionals
including suspension	appropriately		processionals
and de-selection.			
Services evidence all			
aspects of			
intervention			
through case			
notes/recording			

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