

# EUROPEAN LEGISLATION TO FIGHT DOMESTIC VIOLENCE: VARIANCE WITHIN TRANSLATIONS OF INTERNATIONAL POLICY TO NATIONAL LEVEL

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## **Abstract**

*The implementation of international policies relating to domestic violence on national level is mostly discussed under the binary of compliance and non-compliance. Drawing on research employing the method of comparative policy analysis conducted by the IMPRODOVA<sup>1</sup> project, the article argues that much is to be gained by analysing variance within compliant translations of international policy to national levels. Three examples for such variance are discussed, in a cross-national and cross-sectoral comparative policy analysis, in relation to the translations of the "Istanbul Convention" in a number of EU-States. In doing so, examples for the advantages of this analytical approach adopted by IMPRODOVA can be shown along the preliminary findings on the topics of (1) definitions and conceptions of Domestic Violence, (2) organisation of frontline responder services and cooperation, and (3) risk assessment tools and methodologies in the area of national policy analysis.*

**Key Words:** *definitions of domestic violence, Istanbul Convention, policy implementation, comparative analysis, risk-assessment, European policy*

<sup>1</sup> This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 787054. This article reflects only the authors' view and the European Commission is not responsible for any use that may be made of the information it contains.

## Introduction

Any serious discussion of policies to fight domestic violence necessarily encompasses European and international policies and standards, legislature and policy on national level, and the relationship between the two. However, these discussions frequently focus on, or are limited to, a binary of compliance and non-compliance. The preliminary findings of research conducted within the IMPRODOVA project<sup>2</sup>, make evident that an equally relevant, and often more productive approach, may be transcending this binary. Significant insights for the advancement of the European response to domestic violence lie in the analysis of *variance within compliant translations of international policy to national level*.

Following a selection of the most relevant international policies to have emerged since the 1990s within the United Nations, Council of Europe and European Union relating to domestic violence, the article will focus on what may arguably be the most important in this topic: The 2011 *Convention on preventing and combating violence against women and domestic violence (Istanbul Convention)*. Drawing on the comparative policy analysis conducted jointly by all members of the IMPRODOVA project, and relating these results to specific sections of the Convention, the article will provide three examples in which an analysis of variance within compliant translations of international policy to national level provides unique and valuable insights.

First, a discussion of fundamental variance in legislative approach, such as the inclusion or exclusion of domestic violence as an autonomous crime in the penal code, will show that these differences do not necessarily indicate a diminished efficacy of specific national responses. At the same time, an analysis of such *variance within translations* will provide insights into the possible unintended consequences of these different approaches.

Secondly, differences in national definitions of domestic violence, focused in particular on gendered and non-gendered definitions, will show how variance in national implementation may sometimes be reminiscent of debates that shaped the very phrasing and orientation of documents such as the *Istanbul Convention*.

Finally, variance in methods of distinguishing between domestic violence and high-risk domestic violence, is not solely based on different approaches in implementing international policy in particular, but is indicative of fundamental challenges<sup>3</sup> (and prevailing problems<sup>4</sup> of assessing risk in general.

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2 [www.improdova.eu](http://www.improdova.eu) [accessed 16th September 2019]

3 Such as definition of target function, perpetrator or victim focused assessments, situation or process-oriented assessments, danger or vulnerability assessment, sensitivity/validity of the risk assessment tools employed.

4 Such as the organizational context of risk assessment like their length, time available, or resources needed.

## The *Istanbul Convention* and other relevant domestic violence-related International Policies

The 1990s saw what was arguably the first major surge of international policy frameworks and documents addressing *violence against women* in general, and *domestic violence* in particular. On the shoulders of earlier initiatives and institutions such as the United Nations *Convention on the Elimination of Discrimination against Women* (CEDAW) adopted in 1979; the United Nations, Council of Europe, and European Union began drafting documents intended to provide guidance and legal grounds for the national responses to domestic violence. While the CEDAW did not yet include references to violence against women, focusing instead on the legally binding imperative to ensure equal rights between the sexes, its acknowledgement of the structural inequality experienced by women formed the entry point for ground-breaking resolutions relating specifically to the topic of violence. The first of these adopted by the United Nations General Assembly, the *Declaration on the Elimination of Violence against Women* (Resolution 48/104), saw its ratification in 1993. Others followed, such as the 1995 *Beijing Declaration and Platform for Action*, which included the objective to end all forms of violence towards women as well as practical measures to be taken by states, international organizations and NGOs. In 2015, countering violence against women was included among the *Sustainable Development Goals*. Frequently relating to these UN resolutions, the *Council of Europe*, as well as the *European Union*, adopted a number of instruments to combat this form of violence. Pertinent examples are: the *Council of Europe* recommendation REC(2002)5 on the *Protection of Women Against Violence*, the 2005 convention addressing human trafficking<sup>5</sup>, and the *Istanbul Convention on Preventing and Combatting Violence against Women and Domestic Violence*. Similarly, *Directive 2004/81/EC* and *Directive 2011/36/EU* specifically targeted violence against women in the context of human trafficking, while the *Victims' Directive*<sup>6</sup> of 2012 provided minimum standards on the rights, support and protection of victims in general.

### The European Victim's Directive 2012

The European Victims Directive (2012/29/EU) outlines frameworks specific to the implementation of national strategies to combat violence against women and domestic violence. IMPRODOVA's focus on the protection of victims of domestic violence lies inter alia: on the implementation of Victim's support services (Art. 8 and 9), on training of practitioners (Art. 25), and cooperation and coordination of services (Art. 26). As a large section of the articles of the *European Victims Directive* relate strongly to the *Istanbul Convention*, the discussions in following sections will relate only to translations of the latter in an effort to reduce complexity.

5 Council of Europe Convention of on Action against Trafficking in Human Beings (2005); Directive 2011/36/EU on preventing and combating trafficking in human beings

6 Directive 2012/29/EU

## Istanbul Convention

While numerous international policy documents (only a selection of which have been outlined above) relate to the topic of domestic violence, the ratification of the *Convention on Preventing and Combating Violence against Women and Domestic Violence* in 2011, represents perhaps the most important attempt to institute a comprehensive policy framework in this field. The "*Istanbul Convention*" includes the first legally binding, international and wide-reaching set of norms to combat violence against women in general, and domestic violence specifically. Across twelve chapters and eighty-one articles, the Convention entails several detailed measures in the areas of policy, prevention, provision, protection and prosecution, as well as comprehensive definitions for each of these forms of violence.

Violence against women "is understood as a violation of human rights and a form of discrimination against women and shall mean all acts of gender-based violence that result in, or are likely to result in, physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life" (Art. 3 Sec. a). This definition makes it possible to address both physical and psychological violence, as well as forced marriages, genital mutilation, forced sterilizations, rape, and sexual harassment. Article 2 further encourages the application of the Convention to victims of domestic violence (Art. 2 Sec. 2), which is defined as "all acts of physical, sexual, psychological or economic violence that occur within the family or domestic unit or between former or current spouses or partners, whether or not the perpetrator shares or has shared the same residence with the victim" (Art. 3 Sec. B). While the application of the Convention to all forms of violence against women (Art. 2 Sec. 1) both in times of peace and in situations of armed conflict (Art. 2 Sec. 3) are legally binding, the inclusion of domestic violence within its scope remains a recommendation. The peculiarity of this differentiation shall be addressed in a later section.

Among numerous detailed measures to combat violence against women, the *Istanbul Convention* includes norms on risk assessment and risk management, outlining the imperative to "take necessary legislative or other measures" (Art. 51 Sec. 1) to ensure that relevant authorities evaluate the risk of lethality, seriousness of situation as well as the risk of repeated violence. Chapter IV includes articles outlining the imperative to provide specialized support for victims such as the proper provision of information (Art. 19), assistance in individual/collective complaints (Art. 21), specialist support services (Art. 22), shelters (Art. 23), as well as support and encouragement for reporting (Art. 27). Further chapters extend the purview of the convention for example to areas of *migration and asylum* (Chapter VII), *international cooperation* (Chapter VIII), *prevention* (Chapter III) and *substantive law* (Chapter V).

## Three Areas of Variance within Translations of International Policies to National Level

By October 2020, thirty-four countries have ratified the *Istanbul Convention*, with twelve further countries whose signature was not yet followed by ratification.<sup>7</sup> Of the countries participating in the IMPRODOVA project, Austria, Finland, France, Germany, Portugal, Slovenia, and the United Kingdom have all ratified the Convention, with Hungary remaining the only signatory pending ratification. Against this background of a joint commitment to implement the policies outlined by the Convention, the research conducted by the IMPRODOVA project includes an interrogation of national policies to respond to domestic violence. Beyond the identification of gaps within the compliance by individual Member States, our research has revealed what is better described as variance within attempts to translate international policies to national level. We analysed policy documents on national level and organisational level for three frontline responder sectors in eight Member States. Data collection commenced with National Action Plans on Combatting Domestic Violence/Violence against Women (required by the Istanbul Convention) in eight Member States, and was expanded to intra-organisational guidance, and provisions of case management, including case documentation and risk assessment tools for three frontline responder sectors (law enforcement, medical, and social sector). The cross-national and cross-sectoral comparative document and practice analysis focussed on the topics of (1) definitions and conceptions of Domestic Violence, (2) organisation of frontline responder services and cooperation, and (3) risk assessment tools and methodologies.

In the following section, three areas in which such variance is evident will be outlined in order to show the practical outcomes of attempted transmissions of international guidance and policy to national level. As will be shown, such variance is a necessary result of the differences in legal and organizational frameworks on national level.

### Domestic Violence in the Penal Code

The primary moment of national compliance to international frameworks is often that of adoption and implementation within national legislature. Article 7 of the *Istanbul Convention* stipulates such legislative steps as well as “other measures” (Art. 7 Sec. 1) resulting in “comprehensive and coordinated policies encompassing all relevant measures to prevent and combat all forms of violence covered by the scope of [the] Convention and offer a holistic response to violence against women.” (Ibid) Relating to domestic violence, variance within translation of this Article can be made particularly evident when referring to a very fundamental difference in national approaches: legislating domestic violence as a criminal offence in itself within the Penal Code, or by some other legislative means, such as defining offences within close relationships as subject to public prosecution. This

<sup>7</sup> Council of Europe, status as of 20-8-2018.

example gains further pertinence in the context of the fact that the application of the Convention to the field of domestic violence remains a recommendation and is therefore not legally binding. Thus, a discussion of variance between national translations firmly avoids the binary of compliance and non-compliance.

Within the sample of countries participating in the IMPRODOVA project, fundamentally different approaches are evident. On the one side, domestic violence has been enacted as a criminal offence in the Portuguese Penal Code since 2007 (PPC; Law N° 59/2007, 4 September). The same has applied for Slovenia under the term *Family Violence* since 2008 (Article 191, PG-1, OG RS, N° 55/08 and 66/08), and most recently for Scotland, which has made *Domestic Abuse* a specific criminal offence in 2018<sup>8</sup>. Austria, France, Germany and Finland on the other hand, do not include domestic violence in their Penal Codes.

**Table 1:** Domestic Violence Provisions in Penal Code

Country	Concept	Criminal Code provision	Year of inclusion
Portugal	Domestic Violence	PPC; Law N° 59/2007, 4 September	2007
Slovenia	Family Violence	Article 191, PG-1, OG RS, N° 55/08 and 66/08	2008
Scotland	Domestic Abuse	Domestic Abuse Act 2018	2018

Prosecution instead follows the myriad criminal acts possibly committed when an act of domestic violence occurs. These frequently include bodily injuries, insult, intimidation, libel or slander.

Five of the countries participating in the IMPRODOVA-project<sup>9</sup> have adopted the strategy of improving the response to domestic violence without including it as a type of crime in the Penal Code, by implementing policies such as Germany's *Protection against Violence Act* (Gewaltschutzgesetz), Austria's equivalent of the same, or its *Police Security Act* (Sicherheitspolizeigesetz). Austria has further adopted the approach of making relevant criminal acts committed in the context of domestic violence *ex-officio crimes*, improving the ability for law enforcement to respond to such acts of violence, and ensuring that "prosecution of offences established [in the Convention] shall not be wholly dependent upon a report or complaint filed by a victim [...]" (*Istanbul Convention*, Art. 55 Sec. 1). The *Police Security Act* also formalizes the cooperation between law enforcement and the social sector, as every incident in which a restraining order was issued must be communicated to a social sector organization to improve victims' support (relevant also in relation to Article 9).

8 <https://www.gov.scot/news/domestic-abuse-act-in-force/> [accessed: 20th August 2019]

9 Austria, France, Germany, Finland, and Hungary.

Highlighting these differences in national legal frameworks reveals that, while enacting domestic violence a specific criminal offence may appear to be the most compliant approach for national translation, it is not an exclusionary prerequisite for organising an effective national response. On the one hand, including domestic violence a separate, criminal offence seems to enhance clarity, increase visibility, and help to recognise the phenomenon. On the other hand, however, the implementation of Domestic Violence as an ex-officio crime can also widen the area of discretion exerted by police officers. On the one hand, including domestic violence a separate, criminal offence seems to enhance clarity, increase visibility, and help to recognise the phenomenon. On the other hand, however, the implementation of Domestic Violence as an ex-officio crime can also widen the area of discretion exerted by police officers. Through a broadening of phenomena, beyond material evidence, included into the definition of “Domestic Abuse” in Scotland, frontline responders can take into account less manifest factors which allows for discretionary inclusion<sup>10</sup>. The exclusion of domestic violence from the Penal Code represents at least a symbolic difference with several practical consequences. Not differentiating between acts of violence committed between intimate partners and violence occurring between strangers may diminish a legal and social awareness for the phenomenon of domestic violence and its complexity. At the very least, a lack of differentiation between such acts seriously diminishes the statistical record of domestic violence, which may in turn have negative consequences for the level of funding or attention in general it receives. Though not an exclusionary condition, an empirical awareness of the prevalence of domestic violence on national and international levels is often instrumental in the allocation of adequate funding and the urgency of responses on policy level. Ideally, such statistical records would be refined to avoid the repetition of previous misconceptions (such as those of gender-symmetry) discussed in the context of existing surveying approaches (Myhill, 2017).

### **Differences in the Conception and Definitions of Domestic Violence**

An insight into a second area of variance within translation of European policy frameworks, present in the preliminary findings of the IMPRODOVA-project, lies within the differences in national conceptions and definitions of domestic violence. Particularly the difference between gendered and gender-neutral definitions exemplifies such variance well.

Policies in the majority of countries employ gender-neutral definitions. Portugal, for example, summarized their policy definition of domestic violence as any incident, or pattern of incidents, involving controlling, coercive, threatening behaviour, violence or abuse between those who are – or have been – intimate partners of family members regardless of gender, age or sexuality. Germany and Austria, which do not include domestic vio-

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<sup>10</sup> For a discussion on police discretion see Mayhill & Johnson (2016).

lence in their Penal Codes, necessarily rely on criminal offences for the prosecution of such violence that are not specific to any gender. Some countries, such as Finland, mirror the approach taken by the Convention itself: While its Penal Code predominantly employs gender-neutral language, Finland's *National Action Plan* explicitly encourages the focus on women and girls as victims of gender-based violence. This recommendation, similar to the approach in Article 2 of *the Istanbul Convention*, is subsequently expanded by a clause, stating that this policy should also be applied to men and boys who have become victims of domestic violence. The same holds true of Finland's Government Bill (78/2010), subjecting petty assaults in the context of close relationships to public prosecution. This bill at once highlights the higher victimisation rate of women, while maintaining the gender-neutrality of the definitions of victims and perpetrators in the penal code to accommodate violence in same sex relationships or the victimisation of men. In contrast, Hungary defines domestic violence as an act that is regularly committed, mostly against women and children. Focusing on these victims' emotional and financial powerlessness and acknowledging their higher rate of victimization, this definition remains open to the inclusion of other victims of such violence. Finally, Scotland employs a decidedly gendered definition of domestic abuse in its national strategy, based on *the United Nations Declaration on the Elimination of Violence against Women* (1993). Underlying this gendered definition is the recognition of the specific relationship between domestic abuse and gender inequality as its cause and consequence (Burman & Brooks-Hay, 2018). Simultaneously, the definition employed by Scottish Police amends the understanding of domestic violence to include male victims of female perpetrators as well as the abuse of lesbian, gay, bisexual, transgender and intersex (LGBTI+) persons. Arguably, the Scottish approach mirrors the one employed by the *Istanbul Convention*, Finland, and Hungary. The central difference is, that the latter cases combine within one piece of policy, the recognition of gender-asymmetry in domestic violence with the possibility of extending the responses to other victim-perpetrator constellations. In the case of Scotland, this same combination is achieved by adopting a gender-sensitive definition on national, and a gender-neutral definition on law enforcement levels.

In outlining this variance in the translation of international policies to the national level, it becomes evident that different approaches not only comply with the *Istanbul Convention*, but that the variation in itself mirrors a debate underlying the very phrasing of this document. Article 2 Section 1 states that the *Istanbul Convention* "shall apply to all forms of violence against women, including domestic violence, which affects women disproportionately." The following section 3 *encourages* parties "to apply this Convention to all victims of domestic violence. Parties shall pay particular attention to women victims of gender-based violence in implementing the provisions of this convention."

This formulation followed a fundamental debate on whether the Convention should adopt a gender-neutral definition of domestic violence, guaranteeing the inclusion of vi-

olence experienced by victims regardless of their gender. The competing position to focus the *Istanbul Convention* more narrowly on violence against women, was based on the argument that such violence is always grounded in the specific role women are assigned within gender relations in society as a whole. (Burman & Brooks-Hay, 2018; Logar, 2014). A gender-neutral formulation would obstruct responses aimed at this core of the problem, as the gender-relations underlying violence against women would be obscured. In part due to efforts on the side of the host-country, Turkey, a consensus was reached to include the gender-neutral category of domestic violence, while simultaneously augmenting the category with a reference to the fact that women are disproportionately affected by the same (Logar, 2014).

In referencing this debate between the authors of the Convention, the goal is to draw attention to the fact that variance in national translation is seldom the sole result of differences in the form or context of implementation. Comparing policies on the national level reveals variance in the conceptions and definitions of domestic violence, which predate the ratification of the Convention. Rather, these national variations mirror different positions in the fundamental debate on how to best comprehend, define and respond to domestic violence and violence against women as such.

A focus on the variance within translation of international policies in this case, directs analytical attention to debates underlying the policies themselves, allowing new challenges to become visible. Rather than understanding differences in national policy approaches as merely bound to legislative contexts, strategic and symbolic dimensions and their effects begin to appear. Gendered definitions may enforce specific discourses on female victimisation. While this may lead to an increased sensibility for victims of domestic violence in the context of broader gender relations, it may also give rise to counter-movements of women who reject the label of victim and its associated subjugation (Young, 2003) or men who reject the label of sole violent perpetrators, sometimes in reactionary ways.<sup>11</sup> The same holds true for the unintended possible exclusion of other persons facing structural marginalisation such as the LGBTI+ Communities. On the other hand, it is highly questionable to deny the structural gender-relations at the core of domestic violence, and the lack of legislative acknowledgment of this fact seriously diminishes the ability to respond to these.

This analytical perspective may also be fruitful when applied on a sectoral rather than national level of comparison. The differences in the specific roles of law enforcement and social sector organisations for example, are strongly tied to the underlying logic of their individual responses. The Scottish case mentioned above, illustrates this point nicely. The fact that law enforcement employs a gender-neutral definition of domestic violence,

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11 On Victimization of Women see also Meloy & Miller (2010).

while many social sector organisations are able to relate more closely to the gendered understanding of the phenomenon present in national policy, may point towards the positions available to these individual sectors within the debate. While law enforcement agencies are confronted with a multiplicity of consequences of structural inequalities in their daily work, their interventions into the gender-relations in society as a whole are limited within the prism of criminal (procedural) law. The position within the outlined debate available to law enforcement as an institution is most frequently that of gender-neutrality: police interventions are centred on gender-neutral categories of victims, suspects, the accused and so on. The specific functions of different social sector organisations on the other hand, may make gendered definitions of domestic violence more readily available to these. The existence of women's shelters for example reveals the gendered nature of the problem. Applying this analytical perspective to uncover differences in underlying logics of sectors may provide insight into topics such as challenges in cooperation between different organisations.

### **Differentiating High-Risk from non-High-Risk Domestic Violence**

A final area in which *variance* became evident between the countries included in the IMPRODOVA study, relates to the implementation of Article 51 of the *Istanbul Convention*<sup>12</sup>. Article 51, Section 1 formulates the imperative to “take the necessary legislative or other measures to ensure that an assessment of the lethality risk, the seriousness of the situation and the risk of repeated violence is carried out by all relevant authorities in order to manage the risk and if necessary to provide coordinated safety and support.”

Unlike the previous examples however, attempted translation is not clearly visible on policy level in any country participating in the IMPRODOVA project. Nonetheless, such undertakings appear when reviewing policies and frameworks of law enforcement agencies, medical and social sectors of each country. Only on this organizational level, does the distinction between domestic violence and high-risk domestic violence, for example, appear. Therefore, while not implemented on the national policy level, this distinction is embedded on an organizational level for frontline responders. The definition of the risk level often forms the basis for the actions and resources of frontline responders.

A pertinent example for this may be the implementation of Multi Agency Risk Assessment Conferences (MARAC)<sup>13</sup> in Scotland. Similarly, while the definition of high impact domestic violence is not part of the Austrian National Action Plan, the Ministry of Internal Affairs internally define some indicators for high-risk situations (e.g. drug or alcohol abuse, weapons possession) to draw a line between serious and less serious forms of domestic violence. No differentiation between high impact and non-high impact domestic vio-

12 Art. 51 – Risk assessment and risk management

13 A good general introduction to *Multi-Agency Risk Assessment Conferences* (MARAC) can be found at [www.safelives.org.uk](http://www.safelives.org.uk)

lence is made in the Finish, Hungarian, German or French Penal Codes, nor within the definition of domestic violence in Portugal.

As a result, high-risk domestic violence may not be defined in policy documents in most of the European countries, but the gravity of specific crimes (weapons position, gravity of injury, etc.) differentiates in some way between situations of higher and lower risk. To assess the level of risk of a situation, specific risk assessment tools are used by frontline responders, which (partly) influence their further action, internal organization and responsibility. Moreover, resources are frequently allocated according to the level of situational risk. As an example, in Austria the emergency restraining order, issued by a Police Officer on site, is based on the perceived severity (such as intensity, frequency, and repetition of (physical) violence) and on the possibility of further violence towards the victim.<sup>14</sup> This may also cause the effect of lower attention on “non-high-risk” situations and should be therefore considered with caution.

As such, *variance in translation* does not take place on national policy level, but on the level of actors and agencies in EU states. Preliminary findings of the IMPRODOVA project further indicate that particularly the topic of risk assessments is frequently accompanied with major challenges in implementation and incompatibilities between participating actors. While one interpretation of this fact may lead to the conclusion that a cause for these difficulties may be the specific lack of unification and standardization through national and international policies, an analysis of the variance within attempted translation reveals additional possible interpretations. One such alternative interpretation arises when considering the *similarity* of challenges faced in the implementation of risk assessments (such as challenges in the compatibility of different risk-assessment approaches, cooperation between agencies conducting these, as well as prognostic reliability of such tools), while noting the *dissimilarities* of national contexts these implementations take place in (these similar challenges occurring in very different legal, organisational or geographic contexts). This may point to the possible necessity of questioning risk assessments themselves as a cause for challenges of application or cooperation between agencies, rather than the forms of their attempted implementation. The same holds true for differences in contexts within a single nation. Risk assessments conducted by police officers in Austria for example, seem to face similar challenges whether conducted at the scene of the act of violence or upon return to the station, in rural or urban contexts, using more simple or elaborate methodologies. The challenge of any risk assessment is to balance capturing the complexity of an abusive relationship and its timely conclusion as well as predicting the likelihood of future offences. Questioning the “underlying rational and associated

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<sup>14</sup> The degree of severity can be assessed according to the following criteria: current and past behavior of the suspect, damaged property, torn clothing, alcohol or other substance abuse, previous calls to emergency centers, physical injuries and bruises, reluctance of victim to talk about the incident, depression and anxiety (IMPRODOVA Training Platform, 2020).

goals of risk assessment in the police context” (Ariza, Robinson & Myhill., 2016) may prove to be the necessary condition for more successful implementation or the development of entirely new tools. As such, it may raise fundamental questions concerning the logic of preventative approaches and the difference between such interventions when applied in a punitive context or to empower the potentially victimized (Cremer-Schäfer, 2016).

## Conclusion: Variance as a possible source of innovation

Significant variance exists in national attempts and approaches to implementing international policy relating to domestic violence. This variance often stems from different approaches in the response to domestic violence, which partly mirrors debates taking place within international policies. Beyond identifying gaps in implementation, an analysis of different forms of translation yields valuable insights into variance caused by specific national contexts, fundamental differences in strategies to counter domestic violence, or institutional arrangements and measures employed within them. This analytical approach also has the potential to reveal *innovation* within the variance in national approaches. The IMPRODOVA project has the objective to identify possible best-practice cases from the outset. While some such cases, for example the *Multi-Agency Risk Assessment Conferences* in Scotland, were easy to identify as promising, a number of national practices only emerged as innovative when the comparative analysis revealed their unique benefits. As the IMPRODOVA project continues, elements of *variance in translations of international policy to national level* will be further investigated. Following evaluations and practitioner validation, new practices may emerge as previously overlooked approaches to be shared in an attempt to improve the international response to domestic violence.

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