



December 2025

re: Crime & Policing Bill clause 104

Dear Members of the House of Lords

We are writing to express urgent and serious concerns regarding the proposed criminalisation of domestic abuse victims within the Crime and Policing Bill, and to ask for your support to remove the relevant clause - Paragraph 104.

The current proposal has been driven by lobbying from Reunite and Both Parents Matter (formerly Families Need Fathers) with no adequate scrutiny of its impact on victims of domestic abuse. It has progressed under the radar since early 2025: we only became aware of it this month.

The proposal would make the 'retention' of a child by a parent after a permitted visit outside the UK a criminal offence for the first time, under the Child Abduction Act 1984. This significant change to the law has not been debated in Parliament, and the accompanying Equality and Impact Assessment contains a fundamental factual error. It states that men and women are 'equally responsible' for child abduction under s.1 of the Child Abduction Act 1984 and, on this basis, concludes that no protected group would be disproportionately affected. This conclusion is demonstrably incorrect.

Data and research on international parental child abduction demonstrate that over 75% of taking parents are primary-carer mothers, the majority of whom are victims of domestic abuse returning to the safety of their country of origin to access family support. Indeed, GlobalARRK service-user data indicates a much higher number – around 90% of civil law retention cases involve a 'taking' mother fleeing abuse.

Civil law remedies already exist to secure the return of children to their habitual residence in the UK. Criminalising the taking parent is unnecessary for achieving this outcome and serves only to punish, rather than protect. It could also result in children being returned alone, without their protective parent, if mothers fear arrest and prosecution. We hope you will agree that it is fundamentally wrong to criminalise this vulnerable population and put children at risk. It will cause more harm than good.

We, the undersigned, support the recommendations outlined in the attached joint briefing. We strongly invite and urge you to support the removal of Clause 104 from the Bill in order to prevent unintended and harmful consequences for those who are already vulnerable.

Please contact Roz Osborne: office@globalarrk.org or Ruth Dineen: hague@filia.org.uk for further information.

Yours sincerely

Roz Osborne, CEO, GlobalARRK

Ruth Dineen, International Coordinator, FiLiA Hague Mothers

Dr Charlotte Proudman, Founder & Co-Director, Right to Equality

Dr Adrienne Barnett, Co-director, Right to Equality

Farah Nazeer, Chief Executive, Women's Aid

Olive Craig, Mandip Ghai, Senior Legal Officers, Rights of Women

Harriet Wistrich, Solicitor & Director, Centre for Women's Justice

Dr Elizabeth Dalgarno, Director & Founder, Shera Research Group

Vivienne Hayes OBE, CEO, Women's Resource Centre

Sally Jackson, Global Lead for ending male violence, FiLiA

Rachel Horman-Brown, KC (hon), Watson Ramsbottom Solicitors

Jo Gough, CEO, RISE UK

Dr Emma Katz, Senior Lecturer in Criminology, Edge Hill University

Zoe Dronfield, Campaigner, Survivor & Trustee, Paladin National Stalking Advocacy Services

Dr Rachael Grey, CEO, Project Lighthouse

Imogen Tutt, Senior Public Affairs & Policy Officer, Safe Lives

Nik Peasgood, Chief Executive, Leeds Women's Aid

Sarah Hill, CEO, IDAS - Independent Domestic Abuse Services

Dr Shonagh Dillon, CEO, Aurora New Dawn

Liz Mack, CEO, Advance

Yasmin Khan, CEO, Staying Put

Stephanie Futter-Orel, Executive Director, WAVE (Women Against Violence Europe)

Adama Sira Le Blay, Co-president, European Network of Migrant Women

