

National Strategy on Violence against Women, Domestic Abuse and Sexual Violence: A Framework for delivery 2016-2021

Welsh Women's Aid Consultation Response

Introduction

Welsh Women's Aid is the national charity in Wales working to prevent domestic abuse and all forms of violence against women and ensure high-quality services for survivors that are needs-led, gender-responsive and holistic. This consultation response has been informed by our contributions to the legislation and strategy development in Wales, by national consultation with survivors of all forms of violence and abuse, and by discussions with our members (independent specialist domestic abuse/violence against women services across Wales).

Headline points

Within this consultation response we set out in detail our concerns with the current draft of the national strategy and recommendations for improving it to ensure it effectively sets out objectives to make a real difference to the lives of survivors in Wales. Overall our key recommendations are that the strategy:

- 1. Keeps the UN VAW definition of violence against women as in the Right to Be Safe Strategy.**
- 2. Includes long term objectives around primary prevention linked to gender equality work.**
- 3. Commits to working with the specialist third sector to develop a model for sustainable funding for specialist services from 2017, to include specialist services for children and young people.**
- 4. Sets out the 'Change that Lasts model' as an early intervention coordinated community service model, to align with the Home Office Strategy.**
- 5. Includes the 10 key recommendations made by survivors in the report to the Advisory Board in the strategy and ensure the detailed recommendations in the report inform the delivery plan.**
- 6. Includes cross-governmental commitments for delivery from other Cabinet Secretary portfolios including health, education, local government and finance.**
- 7. Provides national leadership that clarifies the responsibility of regions and local public services to deliver against the objectives and outcomes.**
- 8. Cross-references to the UK Ending VAW Strategy for join with non-devolved objectives, in particular under protection.**
- 9. Ensures the priorities are SMART and set out clear and measurable targets and timescales within the delivery plan.**
- 10. Cross-references the priorities to the Istanbul Convention principles to support specialist services and perpetrator intervention.**

PREVENTION

Do you agree with the priorities under prevention?

X No

Do you have any further suggestions? Please include any evidence (data, research or anecdotal).

The proposed objectives to achieve primary prevention in Wales (i.e. stopping violence against women from happening in the first place) are (1) Increasing awareness, (2) Enhancing education about healthy relationships and gender equality, and (3) Challenging perpetrators, hold them accountable for their actions and provide interventions and support to change their behaviour.¹

Whilst we agree with these broad objectives, the priorities to deliver them are inadequate, and the third objective should feature under 'protection' rather than primary prevention. Unless the intention is that this section includes 'early intervention'; in which case, further priorities relating to this are needed.

Without the recognition in the Strategy that individual and structural inequality between men and women is the cause and consequence of violence against women, domestic abuse and sexual violence, the priorities suggested under 'prevention' will not adequately address primary prevention. We outline below specific suggestions to strengthen this section and to inform the delivery plan:

OBJECTIVE 1: Increase awareness of violence against women, domestic abuse and sexual violence across the Welsh Population.

1. Coordinated Communications Plan

We welcome the strategies priority to develop a wide reaching communications strategy and resources directed at challenging beliefs and inequalities amongst communities. This commit should ensure a long-term co-ordinated communications plan is in place that challenges gender expectations, norms and stereotypes and their intersection with wider social norms, values, beliefs, attitudes, behaviours and practices. This should also improve accessibility of information about support services available. This must include a public communications campaign that targets different levels of engagement across Wales, including public transport, national and community media, and public billboards. These campaigns should form part of a coordinated approach that set out to achieve long term change in attitudes and behaviour and include evidence-based interventions that are known to contribute to the prevention of violence against women.

This will require an appropriate budget line that goes beyond the costs of running one off campaigns but also recognises the need for evaluation of success in achieving long term change that any

¹ These compare with non-devolved services' prevention and early intervention outcomes for 2020 which in summary are: **(1)** Continued decreases in the overall prevalence of domestic sexual violence and FGM **(2)** More victims are helped to long term independence and freedom from violence and abuse by strengthening the focus on prevention and early intervention and addressing underlying issues driving perpetrators. **(3)** More victims and offenders are identified at the earliest possible opportunity, with effective interventions in place to prevent violence and abuse from escalating. **(4)** Increased awareness across all sections of society with individuals, communities and frontline agencies empowered to confidently challenge negative attitudes to VAWG. **(5)** Increased awareness in children and young people of the importance of respect and consent in relationships and that abusive behaviour is always wrong - including abuse taking place online. **(6)** Social norms, values, beliefs, attitudes, behaviours and practices tolerating VAWG amongst communities continue to shift in recognition of its unacceptability. **(7)** Stronger global evidence base and high quality data on primary prevention is available which helps to inform policies and programmes at home and overseas.

campaign should aim for and the short term increase in disclosures that should result from an effective campaign on violence against women. Specialist services strongly recommend that any awareness campaigns be developed in partnership because the consequences of raised awareness will be increased referrals to specialist services, so investment in increasing their capacity to respond must form part of the communication delivery plan. Similarly resources will need to be invested in specialist services to be involved in the evaluation of campaigns, especially their role in enabling survivors to participate in the evaluation processes.

We suggest the communications plan should also include working with the Welsh media, arts and culture to develop a code of practice and a steering group to promote positive representation of women and accurate reporting on violence against women, domestic violence and sexual violence. The National Union of Journalists has guidelines² on the reporting of violence against women which outlines how media should frame violence against women and girls within the context of gender equality and human rights abuses. These guidelines provide an example as to how media, arts and culture can work within a framework that promotes a clear understanding of violence against women and frames any story or related media within an objective to end the causes and consequences of violence against women.

We agree there is a need to challenge all cultural attitudes that underpin violence against women, domestic abuse and sexual violence, and therefore community champions from across communities in Wales are needed, not only a focus on BME communities or on men and boys.

The Strategy should also introduce targets for achieving equality between women and men in all areas of Government's work.

2. Investment in and involvement of Black and Minority Ethnic (BME) services

Women from Black and minority ethnic communities, including refugee and migrant women, can experience different forms of violence against women including FGM, forced marriage and so-called honour based violence. We welcome the suggestion to work with BME specialist services to further the understanding of women's experiences and improve community responses but there needs to be a comprehensive commitment from the Welsh Government to ensure that appropriate actions are delivered. For example, newly arrived migrant women will need access to information on support services in their own language, interpreters, and there is an urgent need to improve responses to women with no recourse to public funds so that no woman or child is left unsafe due to her migration status. Specific community education work should be outlined within the delivery plan that works in partnership with specialist BME services to challenge community attitudes and increase understanding of the law must be funded.

3. Survivors Voices

Survivor voices need to be strengthened throughout the strategy including within prevention. The Welsh Women's Aid survivor consultation report to inform the development of the national strategy sets out clear recommendations that should be reflected in the strategy, with a particular focus in this section, on their recommendations for training, media and education. These include, for example, compulsory prevention education in all schools and colleges.

² <https://www.nuj.org.uk/documents/nuj-guidelines-on-violence-against-women/>

We support the priority for developing a sustainable survivor engagement framework as part of the preventative priorities as well as other areas, which must include survivors being central to monitoring the implementation of the strategy, plan and accountability mechanisms.

4. Training

Survivors have clearly stated that there is a need for “improved training for all services on all aspects of violence against women, domestic abuse and sexual violence, informed by survivors’ experiences.”³

While the draft strategy outlines the commitment to continue to support the National Training Framework to improve the responses of public services to survivors, it is not clear how this priority will achieve primary prevention to stop violence against women happening in the first place.

There is a need for the strategy to demonstrate alignment of the delivery of the National Training Framework with other legislative training commitments so that public sector training priorities and resources are not competing. Clear communication and leadership is required between Government and the regions to ensure the commitment required under the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 is understood by the relevant stakeholders at a local level, and is given the priority needed.

The strategy needs to recognise that following the delivery of the National Training Framework training, particularly training for Group 2 and Group 3 professionals under the “Ask and Act” framework, there needs to be sufficient resourcing to ensure the sustainability of the good practice post training.

It also needs to be recognised that the roll out of the National Training Framework will increase public sector identification of survivors experiencing abuse and will inevitably increase referrals to specialist services. This needs to be reflected in the “Ask and Act” implementation plan, as the ‘act’ aspect of delivery cannot work effectively without plans to resource the increased capacity and sustainability of specialist services. In addition the strategy needs to include the commitment to effectively evaluate and monitor the impact of the National Training Framework. This should include the resourcing of the specialist sector to be key participants in the evaluation, in particular to ensure survivor voices are integral to this process.

OBJECTIVE 2: Enhance education about healthy relationships and gender equality.

5. Education: teachers, schools and the curriculum

We welcome the objective to enhance education about healthy relationships and gender equality as a key prevention priority. Significantly the understanding that addressing gender inequality via educational settings provides an opportunity to address the root causes of violence against women as well as improve the school environment of girls and young women. Educational settings are an important site where attitudes that condone violence against women, domestic abuse and sexual violence, and gendered stereotypes, can be challenged, and positive attitudes towards gender equality and healthy relationships can be fostered. This would contribute in the short-term to increased protection of young people, and in the long-term to the reduction of the prevalence of violence against women, domestic abuse and sexual violence.

³ *‘Are you listening and am I being heard?’ Survivor Consultation: A report of the recommendations made by survivors of violence against women, domestic abuse and sexual violence, to inform the national strategy in Wales, Welsh Women’s Aid, 2016*

The development of the new curriculum, specifically the health and well-being area of learning and experience, must address the cause and consequence of violence against women through challenging gender norms, expectations and stereotypes as well as providing children and young people with information on what is abuse and how to access support. This must be a compulsory element to the curriculum.

Welsh Women's Aid has worked with the Welsh Government to develop the Whole Education Approach Good Practice Guidance as well as the suite of resources in an accompanying toolkit to provide an effective mechanism for embedding preventative approaches within educational and community settings with young people in Wales (e.g. through the Children Matter STAR resources). However there is limited evidence as to how this guidance is being implemented or will be embedded into practice. The Strategy needs to set out clearly expectations for embedding the Whole Education Approach Guide and related toolkits within educational settings, and establish a reporting and accountability framework for achieving this.

The strategy and delivery plan needs to state how the expertise and knowledge of violence against women, domestic abuse and sexual violence specialist services and how their local support services for children and young people will support the delivery of healthy relationships and gender equality education.

We suggest an additional priority should be for Estyn to monitor progress and produce thematic report against the delivery of violence against women prevention education in schools. This should be referenced within the strategy, which also clarifies how this will inform collaborative working and the priorities of the Cabinet Secretary for Education on improving the prevention, protection and support by schools. In addition we would like to see a commitment within the strategy for further research and evaluation of schools-based work to identify long-term impact on children and young people.

We suggest education settings, including non-formal education, Pupil Referral Units, youth offending teams, higher education and further education need to be engaged in the delivery of healthy relationships and gender equality education programmes. It is critical that the strategy sets out a commitment to include initiatives that ensure the engagement of children and young people in institutions, social care, within the criminal justice system or excluded from education, to access prevention programmes and support. For instance, Welsh Women's Aid Children Matter Project is funded to support professionals (targeting NTF Group 4) working with children and young people to deliver group work with young women and girls identified as experiencing forms of violence or at risk of violence and young men and boys at risk of perpetration or at risk of violence. This is an effective model for early intervention to prevent violence. .

Further evidence-based programmes should be priorities across Wales, such as delivery of Bystander Programmes (invested in and promoted by Public Health England)⁴ and empowerment and self-worth groups and programmes for women and girls. This should also include interventions at Further Education and Higher Education institutions working with professionals and student bodies to influence action taken to challenge 'lad culture' and to ensure links to local specialist services to enable access for students.

6. Adverse childhood experiences and earlier intervention

⁴https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/515634/Evidence_review_bystander_intervention_to_prevent_sexual_and_domestic_violence_in_universities_11April2016.pdf

Domestic abuse, sexual violence, FGM, forced marriage, sexual exploitation and harassment, and being subject to sexism and other discrimination, all adversely impact on children's lives and experiences. Specialist domestic abuse, sexual violence and violence against women services work daily to address 'adverse childhood experiences' and have been doing so for decades, whilst state services have only recently begun to recognise the harms these issues cause in childhood and in later life. We strongly recommend, therefore, that the Strategy identifies the expertise held by these specialist services in any focus on 'adverse childhood experiences', and prioritises the need to resource specialist services to continue doing this work. The national Children Matter Project, for example, delivers training and programmes for professionals working with young people across the country to ensure adverse childhood experiences associated with violence against women, domestic abuse and sexual violence are identified early and addressed effectively.

Minimising the impact of domestic abuse and other adverse experiences on children also necessitates ensuring women have effective access to services and early intervention with perpetrators; both areas of work are the core business of specialist services. So it is vital that the Strategy focus on early intervention does not only focus on children and young people, but also on ensuring that earlier access to help and support, and to challenging of abusive behaviour, is provided for those who are beginning to experience and perpetrate abuse.

OBJECTIVE 3: Challenge perpetrators, hold them accountable for their actions and provide interventions and support to change their behaviour.

7. Perpetrator programmes

Whilst we support this priority, it is not clear how this will achieve primary prevention to stop violence against women happening in the first place, and this might be more relevant under the 'protection' objectives.

The Strategy states this is a new and emerging area of practice where further evidence is needed. However in the UK practice in the area of domestic violence perpetrator programmes has been developing since the 1990s, which is considerably longer than more recent interventions invested in by governments. Further research is necessary for most interventions associated with the prevention of violence against women, domestic abuse and sexual violence, so it is misleading to use this to justify lack of investment to date into perpetrator programmes in Wales.

It is essential for the safety of survivors that any domestic violence perpetrator work is carried out to evidence-based standard (the UK Respect Standard) which is informed by research. For perpetrator work to be effective it needs to work in conjunction with parallel partner safety work, that forms the core of accredited programmes and individual interventions, and must form part of a wider coordinated community response that includes sufficient specialist provision for survivors including refuge. We recommend that the strategy set out a definition of domestic abuse perpetrator work that adheres to the Respect accredited standard (<http://respect.uk.net/>).

The survivor consultation recommended a greater focus on stopping perpetrators' behaviour and holding them to account by public services, and where violence and abuse involves coercive control, action by public services to ensure perpetrators leave and end abusive relationships. Survivors recommended a greater focus on addressing and stopping the behaviour of all perpetrators, not only focusing on domestic abuse. Different approaches are needed for different forms of violence and abuse. For example, exploitation through the sex industry can be reduced and prevented if investments into challenging demand for and social acceptance of prostitution and the commercial sex industry are made by governments. This would also fulfil prevention objectives because it

challenges why so many men participate in a business that exploits, harms and risks the survival of women and children as a group. Any work to challenge demand must be accompanied by the resourcing the provision of better and more accessible safe exit routes that promote economic independence for those who want to leave the sex industry.

ADDITIONAL OBJECTIVE: Challenge the harassment and abuse of women and girls in public spaces in Wales and enable women and girls to access public space in Wales without the fear or threat of violence against women.

8. Online abuse

The strategy not only needs to recognise social media and other digital spaces as effective tools to sharing preventative messages but also as 'spaces' where violence against women and girls occurs. For the strategy to be effective over its five year period it needs to take in to account future trends and spaces of violence against women. We suggest that work to prevent on-line sexual exploitation, digital stalking and associated abuse is addressed within the strategy, which could include, for example, working with CEOP⁵.

9. Violence against women in public spaces

We suggest that the prevention of violence against women in public institutions and spaces needs to be considered and recommend exploring the approach of the UN Safe cities programme <http://www.unwomen.org/en/what-we-do/ending-violence-against-women/creating-safe-public-spaces> Women and girls experience sexual harassment and abuse on the streets and in public institutions in Wales, including being exposed to sexist and offensive billboards and posters on public transport and along roads.

We strongly recommend that the Strategy includes an additional objective with priorities to prevent violence against women, domestic abuse and sexual violence through changing the culture of gender inequality in Wales. This includes programmes to promote women's empowerment and leadership, to expand women's space for action and build an active women's movement, close the gender pay gap and engage more women on public boards. All acts of violence against women, including sexual harassment and stalking, are acts that police a woman's right to feel safe and welcome in any environment. They undermine women's opportunity to participate fully within public life this needs to be recognised within the national strategy to end violence against women in Wales.

PROTECTION

Do you agree with the priorities under protection?

X No

Do you have any further suggestions? Please include any evidence (data, research or anecdotal).

The proposed objective to achieve protection is: (4) Ensuring professionals are trained to provide effective, timely and appropriate responses to survivors.⁶

⁵ <https://ceop.police.uk/>

⁶ These compare with non-devolved services' protection outcomes ('pursuing perpetrators') for 2020 which in summary are: (1) Increased victim confidence in, and access to, the criminal justice system for all victims (2) Improved victim satisfaction within the criminal justice system. (3) An embedded robust approach to tackling

Whilst we agree with the broad objective that professionals are trained, this does not demonstrate how improved protection of survivors can be achieved, does not make significant links with the criminal justice system or recognise the role specialist services provide in enabling survivors to access protection and the criminal, civil and family justice systems. The priorities need to reflect the ambition to do this; we would recommend the following changes to the priorities and additional areas to demonstrate this:

OBJECTIVE 4: Ensure professionals are trained to provide effective, timely and appropriate responses to victims and survivors.

1. Integrated Pathway

The strategy needs to outline what it means by an integrated referral pathway and the stakeholders that form a fundamental part of an integrated referral pathway. It should recognise that these pathways should be embedded within communities and that the majority of identification, early intervention and support is likely to be carried out by or in partnership with specialist services. For that reason, the priority must outline that an integrated referral pathways must include a commitment to sustainably resource specialist services. This should align with the priority to develop a model for sustainable funding of specialist services across Wales. It should also provide guidance to local and regional commissioners that outlines the need to resource specialist services as part of an integrated referral pathway.

2. Safe Spaces

The Live Fear Free Helpline offers an important space for survivors to access information and support, to disclose abuse and know how to access continued support in their local community. . For the helpline to be an effective tool to enable survivors to access protection there needs to be sustainable specialist sector for the helpline to refer into.

In addition, the priority to provide safe confidential places for survivors to gain advice and disclose abuse should also facilitate an increase in physical spaces where survivors can access this or be signposted to the helpline or support services. Welsh Women's Aid is piloting the "Ask Me" scheme in local rural communities with commissioning and specialist services partners in Powys, that aims to develop these safe spaces in communities in which survivors can disclose abuse early and get the help that they need. This involves training individuals in local communities at a range of "spaces for action"⁷ to be equipped with the basic skills, knowledge and tools to have a supportive conversation and provide an initial appropriate response. This will dovetail with the roll out of the Ask and Act training for public sector professionals in the area. It is recommended this initiative should be highlighted in the Strategy and delivery plan, as the model was developed with support from Welsh Government.

3. Trafficking and sexual exploitation

perpetrators through greater scrutiny of their motives and behaviour with a reduction in re-offending. (4) Improved use of new technology and rehabilitation directed with a measurable reduction in reoffending for these crimes (5) Greater transparency and accountability of the criminal justice system through improved data provision.

⁷ Stark (2007) argues that coercive control undermines the victim's physical and psychological integrity and that women have little volitional space between abusive incidents to exercise autonomy - women's 'space for action' is therefore diminished. A space for action consists of a physical space where support can be garnered and/or relationships maintained, offering 'thinking time' in which alternatives to living with violence can be contemplated (Kelly et al, 2013).

The strategy should make explicit the connections between the violence against women work, the work of the Anti-Slavery Leadership Group and the role of the Anti-Slavery Coordinator to ensure that trafficking for sexual exploitation is clearly recognised as a form of violence against women and girls. This would include ensuring the recognition of it as a form of violence against women and girls is referenced in the Wales anti-slavery communications and engagement plan and that links are made with the communication plan for this strategy to ensure a consistent message.

The strategy should outline how joined up working can be carried out to ensure that an evidence base is developed on the scale of trafficking for sexual exploitation in Wales, to enable the analysis of need, and develop effective collaborative response to identify and encourage good practice in providing protection and support for survivors of trafficking for sexual exploitation in Wales.

The strategy should also explicitly make connections between the National Training Framework and any training being delivered in Wales on trafficking, and ensure that these links are made in any analysis of future requirements for training in this area.

4. Family First and Flying Start

It is unclear how the priority to work with Families First and Flying Start services aims to provide improved protection of survivors. The priority needs to outline the purpose of working with these initiatives and how this will enable the protection of survivors.

ADDITIONAL OBJECTIVE: Work in partnership with the criminal justice system to improve joined up responses to survivors and to increase confidence for survivors to report violence against women, domestic abuse and sexual violence.

5. Collaboration with Criminal Justice System

The strategy needs to demonstrate a commitment by the Welsh Government for collaborative working with non-devolved partners such as Police and Crime Commissioners, Police, Prosecutors, Courts and Offender Managers. There is precedent with this in the Integrated Offender Management programme in Wales, which includes partnership working across devolved and non-devolved stakeholders on the Women's Pathfinder Project. This project has been developing coherence between the criminal justice system, health and social care, welfare, children's and other community services as well as collaboration between partners both within and outside the criminal justice system including specialist violence against women services.

The strategy should include a commitment that all survivors whose cases progress to court have access to advocacy and pre-trial counselling as outlined in survivors' recommendations. Guidance should be provided to local and regional commissioners to ensure this need is identified within the commissioning of specialist support.

The Welsh Government has a role in ensuring that it makes representation to the UK government on the protection and support of survivors in Wales in areas that are non-devolved. The impact of UK Government decisions on survivors in Wales has knock-on effects on provision of and access to support within devolved areas. For instance the strategy should reference the impact of the legal aid changes on survivors' ability to access justice. The strategy should outline Welsh Government's role in ensuring the impact of non-devolved decisions on survivors is at the forefront of their discussions with UK Government departments.

The importance of survivor voice within the protection agenda is critical to ensure that the system empowers survivors to access justice and to build confidence in how the criminal justice system works

to offer them protection and support. Under 'protection', the strategy should demonstrate how Welsh Government must utilise survivor engagement to influence improvements in survivor experiences of the criminal justice system that is meaningful and that the survivors involved are able to see identifiable improvement in the responses so that confidence can be built. As stated under the prevention priority, the survivor engagement framework must also include the monitoring of the delivery of the strategy and action plan with survivors' voice and experience at the heart of robust accountability mechanisms.

The strategy should also work in partnership with the criminal justice system to ensure that women involved in the criminal justice system can also access protection and support. The strategy should contain a priority to address the gap in recognising the impact of violence against women has had on many women in the criminal justice system and their need for ongoing specialist support both with in prison and on release. It should also recognise how this should link with wider support including housing, mental health and substance misuse services.

6. Family Justice System and Family Courts

Survivors' feedback stated that there needs to be significant improvements to the family justice system and opportunities to maximise safe child contact following separation, in cases of domestic abuse. The strategy should expand the commitment to improve the response of CAFCASS Cymru to working with non-devolved professionals to improve the whole family justice system response to domestic and sexual abuse. This should include promoting closer alignment with National Training Framework requirements for social workers in Wales.

The strategy should outline how the Welsh Government will work with the Care and Social Services Inspectorate Wales to ensure it audits the processes and procedures related to family courts and safe child contact.

The strategy should provide leadership and guidance to local and regional authorities and commissioners to inform them of the need for domestic abuse support workers with sufficient capacity to provide advocacy and support for women through the family justice system, as currently provided through the criminal justice system. Equivalent parallel support for children affected by domestic abuse should also be provided in the form of individual and group work support in refuges and in the community.

7. Domestic Homicide Review

The draft strategy needs to acknowledge the learning from Domestic Homicide Reviews (DHR) across Wales and provide a mechanism for shared learning from DHRs carried out in Wales as well as facilitate the learning from a UK wide level. In particular, early analysis of DHR findings are identifying coercive controlling behaviour as a key indicator of a domestic homicide rather than physical violence. Similarly findings are exposing the limitations of relying on a solely risk based approach in preventing domestic homicides, which focuses resources on those assessed as high risk at a certain time in rather than recognizing the dynamic nature of risk. An additional priority should be to facilitate learning from Domestic Homicide Reviews at a national level and provide guidance to local and regional stakeholders in embedding the learning into practice and needs assessments. We also recommend that the Strategy prioritises the upskilling of professionals available to provide independent chairing of DHRs and ensure statutory services understand their need to adhere to statutory guidance when participating in DHRs. The strategy needs to set out a commitment to and mechanisms for ensuring national learning from DHRs is disseminated across Wales.

8. Public services accountability under FGM, forced marriage and so called honour based violence guidelines

The strategy needs to outline within the priorities for protection that this will extend to provide protection for survivors of all forms of violence against women including FGM, forced marriage and so-called honour based violence. The strategy should clarify public services' accountability to implement existing statutory Forced Marriage Guidelines and FGM guidelines and provide leadership to those devolved authorities that play a critical role ensuring the protection of those at risk of forced marriage, including survivors who are vulnerable, disabled and LGBT+ survivors at risk of forced marriage.

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/70188/forced-marriage-guidelines_English.pdf)

SUPPORT

Do you agree with the priorities under support?

X No

Do you have any further suggestions? Please include any evidence (data, research or anecdotal).

The proposed objectives to deliver support in Wales are to (5) Provide victims with equal access to appropriately resourced high quality, needs led, strength based, gender responsive services across Wales, and (6) Work together as a sector to understand and meet the needs of our communities, increasing the sustainability and capacity of the sector⁸

We agree with the objectives, assuming 'the sector' means specialist services sector whose core business it is to address domestic abuse, sexual violence, and violence against women. However we do not agree that these are all the right priorities to achieve these objectives. The Strategy fails to integrate the recommendations from survivors and fails to acknowledge and recognise the unique and essential role of the specialist support services delivered by domestic abuse and sexual violence services in the third sector in Wales. We have specific suggestions to change the priorities and also make new further suggestions:

OBJECTIVE 5: Provide victims with equal access to appropriately resourced high quality, needs led, strength based, gender responsive services across Wales.

1. Sustainable model for provision

At present there is still a postcode lottery on the provision of all specialist support across Wales. The strategy should reflect the need to improve the consistency in the accessibility of specialist service provision for all forms of VAW across all areas of Wales. We welcome the objective to provide high

⁸These compare with non-devolved services' 'provision of services' outcomes for 2020 which in summary are: (1) Local partners assess the needs of victims and survivors and their families, have local strategies to ensure they can access the right support at the right time. (2) No victim is turned away from accessing critical support services delivered by refuges, rape support centres and FGM and forced marriage units. (3) Services are transformed to provide support at an earlier stage so that fewer victims will reach crisis point and need refuge, or other secure accommodation. (4) Better access to integrated pathways of support to meet the needs of victims experiencing multiple disadvantages. (5) A robust global evidence base in place to support interventions that work and to inform commissioning decisions domestically and abroad.

quality, needs-led strengths based, gender responsive provision to all survivors regardless of geographic area however we would advise that the priorities to achieve this address the following concerns.

Most significantly, the Strategy fails to make any reference to the 'Change that Lasts' service model, which is a model that Welsh Government has resourced and supported the development of, to enable earlier intervention and more effective support for survivors of violence against women, domestic abuse and sexual violence. This model provides a framework that facilitates the shortest and most effective route to safety, freedom and independence for each survivor based on their individual situation and the resources available to them. As part of this model it is important that support services are needs-led and survivor centred, and adhere to national accreditation and quality frameworks e.g. the Welsh Government supported National Quality Service Standards being delivered by Welsh Women's Aid. This model recognises that intervening early, and recognising how domestic and sexual abuse impacts on different family members, is vital to stopping violence from escalating and reducing the harm to survivors and their children. Welsh Women's Aid's 'Change that Lasts' model delivers a needs-led, strengths-based, gender-responsive and trauma informed model of delivery involving survivors, communities, specialist services and trained trusted professionals to achieve earlier intervention and prevention of abuse and transforms how professionals and communities respond and how services are structured. This model is highlighted as an innovative good practice approach in the UK Government strategy, and there is significant scope and interest in delivering this approach within a violence against women legislative and policy context in Wales.

A model for provision of specialist support includes refuge, floating support and community outreach as well as sexual assault referral clinic (SARCs) and therapeutic support for survivors of recent and historic sexual violence. This also includes services for lesbian, gay, bi-sexual and transgender people, older people, young people, disabled people and people from Black, Asian, minority ethnic, refugee and migrant communities.

The strategy needs to recognise it is often not safe or not viable for survivors of violence against women to remain in their home, which might be where the violence was committed against them. The survivor consultation recommended accessible 'refuge service' support in every area, accompanied by safe, affordable, longer-term housing options for survivors of abuse, that provide flexibility, choice and meet survivors' needs. Refuge needs to be recognised as more than crisis accommodation. Refuge provides an immediate safe space for a survivor to escape the controlling, abusive environment that they have been living in and provides the necessary space to think about the options available to them. Refuge provides wrap around support, including peer support, that enables survivors to recognise and start to address the trauma of the abuse they have experienced in a safe and supportive environment. This understanding of refuge needs to be recognised in the priorities in the Strategy with a clear message to local and regional commissioners that the provision of refuge is critical to the protection and support of survivors.

The survivor consultation recommended a range of services that survivors need across all local areas, highlighting the particular gaps and critical need for women in rural areas. The specialist service provision that the survivors outlined included counselling and therapeutic services for survivors that

is available, in every area, when needed, is age-appropriate, and helps build resilience and recovery from abuse⁹. This would include links to mental health provision that should be made in the strategy.

The survivor consultation also recommended women's groups and peer support available in every area, to reduce isolation and maximise independent spaces that increase confidence, esteem and empowerment. In addition it recommended protection and support for all survivors who have no recourse to public funds, to ensure equal access to safety, support, protection and justice, and finances to live independently, irrespective of survivors' immigration and residency status. All of the above recommendations should be reflected in the priorities under this objective.

We suggest additional activity to fund a walk-in FGM clinic in Wales, as there is currently no provision in Wales and women have to travel to Bristol. Women and girls in Wales need to access appropriate services for reversal surgery or treatment without their families or communities knowing and this is difficult when there are no local options available.

We welcome the commitment to better understand the context, as well as promote and embed learning from relevant reviews and innovative responses. Welsh Women's Aid is uniquely placed as a second-tier organization building strategic relationships, distributing information, capacity building specialist services, and piloting new projects to end violence against women in Wales.

2. Children and Young Peoples Specialist Services

We welcome the review of statutory children's services and we know that there is an urgent demand for specialist support as our survivor consultation recommended dedicated specialist services for children and young people impacted by or experiencing domestic abuse, sexual violence, female genital mutilation, forced marriage, sexual exploitation or harassment, available in every area¹⁰.

Concerns have consistently been raised by services and wider stakeholders about the existing postcode lottery of services across Wales and we are concerned about the wide variation in expertise and capacity to provide the sorts of specialised services needed to provide adequate support to children. Consultation with children and young people providers noted that there is a lack of recognition of the fact that children and young people are survivors too and do not currently have equal access to services. The last priority under objective 5 shows no recognition that children and young people need support from specialist services. It has been recommended by specialist services that this priority should include reference to ensuring "every child and young person impacted by violence against women, domestic abuse and sexual violence have access to support."

We recommend that the strategy explicitly outlines a commitment to address the provision of children and young people's specialist support and that it includes a commitment for national and local recognition of the role and value of specialist children and young people's services including within any model for sustainable funding of the specialist services that is developed.

OBJECTIVE 6: Work together as a sector to understand and meet the needs of our communities, increasing the sustainability and capacity of the sector.

⁹ *Are you listening and am I being heard? Survivor Consultation: A report of the recommendations made by survivors of violence against women, domestic abuse and sexual violence, to inform the national strategy in Wales, (March 2016). Welsh Women's Aid*

¹⁰ *Are you listening and am I being heard? Survivor Consultation: A report of the recommendations made by survivors of violence against women, domestic abuse and sexual violence, to inform the national strategy in Wales, (March 2016). Welsh Women's Aid*

3. Model for long term, sustainable funding for specialist services

We welcome the recent commitment to develop a model for long term, sustainable funding of third sector specialist services in Wales but this is not apparent in this Strategy - “a sustainable funding model which will provide service providers with greater certainty” does not specify whether this applies to the public sector or independent specialist third sector services. At present specialist services feel that the strategy commits to ensuring referral pathways from public services into specialist services without any investment in the capacity of those specialist services. Domestic abuse/violence against women services that are Welsh Women’s Aid members have stated that they are already under significant pressure and are concerned by an increase in demand without more investment to secure sufficient service levels across Wales¹¹.

Our survivor consultation recommended the provision across Wales of specialist domestic abuse and sexual violence services for survivors that are accessible and resourced to meet the needs of specific survivor groups, available in every area¹².

The impact of violence against women crosses many areas including health and wellbeing, education, housing, criminal justice, social services, children’s services and equalities. The provision of specialist support to survivors achieves outcomes across these broad agenda and the needs-led interventions provided are cost effective in the long term for all these areas. The strategy should set out a commitment to develop a model of funding that includes collaboration between different commissioners including community safety, safeguarding, housing, supporting people, health and education as well as with non-devolved partners such as Police and Crime Commissioners. The strategy should provide leadership to local and regional commissioners on delivery of a collaborative model and hold them accountable for delivering a sustainable funding for specialist services in their region or locality. This should include effective governance and accountability for commissioning decisions via public service boards and regional collaborative committees.

Welsh Women’s Aid recommends that the strategy outline a commitment to:

- National and local recognition of the role and value of specialist violence against women, domestic abuse and sexual violence services that provide a unique model of provision, delivering prevention, protection and support and added value to local communities.
- Establishing a model for long-term sustainable funding in order to secure the national network of lifesaving and preventative violence against women, domestic abuse and sexual violence specialist services so that they can meet demand
- Central funding for second–tier organisations which support specialist services around sustainability and skills development, quality assurance frameworks, impact, consistency and providing local services with a voice nationally.
- Cross-departmental investment into prevention, protection and provision of support in response to violence against women, domestic abuse and sexual violence
- Statutory guidance that delivers collaborative commissioning and pooled resources by local government, health and the justice system, to ensure delivery of specialist services in every area, so that survivors do not face a post-code lottery when seeking help and

¹¹ *Save Services, Save Lives: State of the Sector report, Welsh Women’s Aid found that 46% of refuge services in Wales have already received cuts to their funding this year, leading to a lack of capacity to meet demand in many areas and inadequate funding for specialist children and young people’s services for many organisations.*

¹² *Are you listening and am I being heard? Survivor Consultation: A report of the recommendations made by survivors of violence against women, domestic abuse and sexual violence, to inform the national strategy in Wales, (March 2016). Welsh Women’s Aid*

support. Welsh Women's Aids Collaborative Commissioning Toolkit for Services in Wales¹³ can be adapted as statutory guidance.

In the short term we welcome the commitment to continue to deliver the current Supporting People programme that funds essential refuge and other specialist accommodation related provision in Wales. However we are deeply concerned that reference to this programme in the Strategy only suggests this should be used to support victims in their own homes. It is vital that Government commitment is made to secure the national network of refuge provision in Wales, which contributes to the UK network of provision. The current uncertainty on the continuation or potential cuts to the Supporting People programme are creating significant instability for specialist services, particularly refuge provision. Many specialist services are facing re-commissioning process being carried out by local authority supporting people teams within the next few months where needs assessments and funding decisions are being carried out with a lack of information on the amount of funding that will be available post March 2017. This is leading to commissioning decisions that favour 'cheaper' generic provision and focus of cost rather than quality of provision.

While the strategy acknowledges that the Supporting People Programme plays a role it does not set out a clear approach or strategic commitment to ensuring that the support provided via the Supporting People Programme will continue and will fund the life saving support of refuge provision. Without this strategic leadership we are likely to see commissioning decisions happening locally that will significantly reduce this life saving provision of specialist services. This will counterproductive in achieving the aims of the strategy to improve the protection and support of survivors.

4. Links to the delivery of Social Services and Wellbeing Act

The implementation of the Social Services and Wellbeing Act provides an important opportunity to strengthen professionals understanding and response to disclosure and identification of violence against women, domestic abuse and sexual violence. We suggest specific guidance for social services and for schools to respond to children who are experiencing or at risk of violence against women, domestic abuse and sexual violence.

Local population needs assessments must identify the needs of all women and girls, including specific work with women from Black and minority ethnic communities, Gypsies and Travellers and refugee and migrant women, to understand and respond to need, however small the population appears to be. Data on needs assessment must be desegregated by protected characteristics.

EQUALITY IMPACT

Do you think the priorities will have a positive / negative impact on protected characteristics?

X Yes

If so, which and why/why not? Are there further opportunities not covered by the priorities to promote equality? Please include any evidence (data, research or anecdotal).

Violence against women, domestic abuse and sexual violence is both a cause and consequence of gender inequality¹⁴. The promotion of gender equality and human rights framework should be explicit

¹³ https://www.lloydsbankfoundation.org.uk/VAWDASV%20Toolkit_Wales_web.pdf

¹⁴ UN General Assembly 2006; http://www.un.org/womenwatch/daw/public/VAW_Study/VAWstudyE.pdf; http://www.who.int/violence_injury_prevention/violence/gender.pdf

throughout the national strategy. If it is not made clear through a rewrite of the definitions and the use of gender-responsive language then we are concerned there will be a negative impact on women in Wales who make up 51% of the population.

The strategy must include a commitment to ensure the support of specialist services that are led by and for women and led by and for BME women. Specialist services not only provide physical, psychological and emotional support, but also empower women who see and hear that their experiences of sexism, racism or homophobia are not isolated and help women find mutual support and self-determination.

We are concerned with the lack of priorities for BME women. We want the Welsh Government to work closely with specialist services to increase understanding of the experience and needs of survivors from Black and minority ethnic communities and to co-design solutions. Without this engagement there will be negative impacts on protected characteristics.

We are concerned that there is not a sufficient understanding of the different needs of survivors, particularly women and girls who are covered by multiple protected characteristics. Survivors of different forms of violence against women, domestic abuse and sexual violence may require a tailored response due to their multiple protected characteristic. This includes services for lesbian, gay, bisexual and transgender people, older people, young people, people of different religions/beliefs, disabled people and people from Black, minority ethnic, refugee and migrant communities. It is important that the Welsh Government, Local Authorities and commissioners consider the intersectional needs of women and girls otherwise there will be a negative impact on protected characteristics. We recommend the publication of the Equality Impact Assessment, to accompany the final strategy and delivery plan.

What opportunities does this strategy give to promote the use of the Welsh Language?

We suggest that the use of the Welsh language is maximized wherever possible. Survivor involvement work should be undertaken in Welsh and English, and commissioning of services should ensure that service delivery is in Welsh where the need is evidenced for this.

Access to information in other languages must be available for women with English and Welsh as a second language, especially for newly arrived migrant women.

Do you have concerns that this strategy could have an adverse effect on opportunities to use the Welsh language?

No

ADDITIONAL INFORMATION

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Beyond the priorities set out under the prevention, protection and support themes, we have a number of overarching concerns regarding the draft strategy that we feel need to be addressed in order to ensure the national strategy provides an effective framework for delivery; these concerns are outlined below.

1. Use of the internationally accepted UN definition

Welsh Women's Aid is seriously concerned that the Welsh Government proposes to stop using the internationally accepted definition of 'violence against women' used by the United Nations¹⁵, World Health Organisation, Crown Prosecution Service, UK Government and others.

The Welsh Government has previously used this within its Right to be Safe strategy 2010-2016, so to include the UN definition of violence against women would allow for clear continuation of the Welsh Government commitment to tackle violence against women as a means of addressing gender inequality and ensuring Welsh women's human rights are protected.

2. Amend the domestic abuse definition

Welsh Women's Aid welcomes the draft strategies use of the term 'coercive control' and the reference to section 76 of the Serious Crime Act 2015 which makes it an offence however we feel that the definitions of 'abuse' and 'domestic abuse' used within the strategy (which is drawn from the Act and derives from the Family Law Act 1996 – before the UK definition was updated) does not specifically include 'coercive control'. The Strategy definitions need to make clear that it is defining domestic abuse with explicit reference to coercive control as it describes the particular pattern of controlling behaviour within an intimate relationship including emotional, financial, sexual and other psychological abuse. While it is welcome that the development in the law is acknowledged the definitions used from the Act do not offer sufficient clarity to situate domestic abuse within this understanding of a pattern of controlling behaviour within an intimate relationship. As such, we recommend that Wales aligns with the UK Government definition of domestic abuse, for data and monitoring purposes, and to ensure consistency between devolved and non-devolved services.

3. Broaden the sexual violence definition

We recommend that the Welsh Government broaden the definition of sexual violence so that it is clear that it includes all of the following: rape, sexual assault, child sexual abuse, sexual harassment, rape within marriage/relationships, trafficking, sexual exploitation, and ritual abuse and is aligned to the Sexual Offences Act 2003. In addition we recommend that the strategy strengthens its commitment to addressing the needs of all sexual violence survivors including historic sexual violence¹⁶ survivors and outlines further how it will improve the accessibility of needs-led specialist support for sexual violence survivors within a framework that enables women and girls to cope and recover from their experiences.

4. An integrated strategy

In regards to Welsh Government departments and areas of non-devolved responsibility, we recommend that the strategy outlines the vision and commitment to integration of this work as a national priority, with the following agendas:

- Education and the New Curriculum Review
- Health including NICE guidance, the implementation of the Social Services and Wellbeing Act and developments in regards to mental health and substance use.
- Supporting People Programme
- Local Government Review

¹⁵ <http://www.un.org/documents/ga/res/48/a48r104.htm>

¹⁶ The UK government and other non-devolved bodies recognise recent sexual violence as within the last 12months and historic as anytime over 12months.

- Housing Act and Rented housing act
- Wellbeing of Future Generations
- Children and young people
- Negotiations on leaving the EU.
- Home Office Ending Violence Against Women and Girls Strategy

While the national strategy sets out some key aims in regards to the prevention, earlier intervention and collaborative working the strategy needs to provide clarity on the leadership, resources and effective integration of this being core business across all Government departments and how this will be implemented via a robust delivery plan and effective guidance to local and regional stakeholders, to achieve effective implementation and in turn to make a real difference to the lives of women and children in Wales. This should include the different levels of responsibility at UK Government, Welsh Government and Local Government.

The strategy needs to demonstrate that there is continuity from the previous work that has been carried out to tackle violence against women in Wales. Continuity with the Right to be Safe strategy would also offer an opportunity to build on some of the collaborative working that was established within its delivery and allow for an evaluation of what has previously worked and not worked.

5. Guidance to local and regional relevant authorities

The national strategy must help to guide and inform local strategies that will follow it as part of the delivery of the Violence against Women, Domestic Abuse and Sexual Violence Act. This would include setting out clear definitions as outlined above and commitments to sustainable funding for specialist services. Similarly clearly placing survivors voices as central to the nation strategy will set a precedent for this to follow at local and regional levels. The strategy needs to outline how local and regional relevant authorities will be held accountable to their duties under this Strategy and the Violence against Women, Domestic Abuse and Sexual Violence Act and clearly demonstrate how sanctions will be carried out if this is not done.

6. European Context

The strategy needs to outline how it will enable the Welsh Government to adhere to the commitments of the EU Victims' Rights Directive which became part of UK legislation in November 2015 (the commitments of this legislation will not alter unless specifically repealed within UK arrangements to leave the EU, so remains relevant and is likely to continue to do so). The directive sets out minimum standards on the rights, support and protection of victims that should be included in needs assessment, commissioning/funding of provision and monitoring of service delivery. As the directive sets out key obligations of the state to deliver it is critical that the directive is referenced within the strategy and how the Welsh Government is going to commit to meeting these obligations is outlined over the period of the strategy should be outlined.

We welcome that fact that the strategy supports the principles of the Istanbul convention and the statement to strengthen the Welsh Governments commitment to set out further measures relevant to the provisions of the convention. This said, the list of provisions as outlined in the strategy is arbitrary and does not align with the all the relevant articles of the convention that would relate to the delivery the aims of the Violence against Women, Domestic Abuse and Sexual Violence Act. The convention establishes legal frameworks for the protection of women, punish perpetrators and to prevent and eradicate all forms of violence against women setting out minimum levels of provision. Member states are required to establish a comprehensive and coordinated policy addressing all forms

of violence covered by the Istanbul Convention and offering a holistic response to violence against women¹⁷.

7. UK Context

The strategy needs to reinforce the commitment to engage and cooperate with wider stakeholders, including UK government and other Welsh Government departments and delivery areas. There is a need to work together on violence against women as an issue which crosses the boundaries of devolved and non-devolved areas of responsibility and this needs to be effectively acknowledged and a clear agenda set out on how this will be achieved within the national strategy.

While there is reference made to the UK Government 'Ending Violence against Women and Girls Strategy 2016-2020' this does not follow through to a commitment to collaborative or joined up approaches within the objectives and priorities set out in the strategy.

Other Welsh Government strategies have successfully done this including the Substance Misuse Strategy for Wales 2008-2018, which dedicates a whole chapter to the UK and European context. WWA would recommend that the substance misuse strategy is used as an example as to how a Welsh Government strategy can effectively set out to tackle an issue that crosses boundaries of devolved and non-devolved responsibilities as well as needing collaboration across many ministerial areas of the Welsh Government.

8. National Advisor role

We have concerns that the advisor role is insufficiently resourced in order to hold parties to account and to provide strong leadership on violence against women. If the national strategy and the subsequent other relevant local authority strategies are to be effectively implemented there is a need for a full-time, resourced adviser role to monitor and question their delivery. This role needs to be outlined in the national strategy.

9. Delivery Plan

The delivery plan for the strategy needs to set out how the objectives and priorities are going to be achieved in a SMART manner that have clear outcomes and are measurable over a set timeframe. The delivery plan will need to include join up across relevant stakeholders including the specialist services, it is therefore critical that specialist services and other stakeholders involved are given an opportunity to consult on and propose the actions set out within the plan.

10. Budget

Throughout the strategy it remains unclear how any of the objectives and priorities will be resourced. The strategy needs to be accompanied with a clear budget commitment to ensure that the strategy objectives and the related actions in the delivery plan are sufficiently resourced so as to be effective in achieving the ambitious aim of ending all forms of violence against women in Wales.

Any comments or questions regarding our response can be directed to: **Gwendolyn Sterk, Public Affairs Manager, 02920 541 551, gwendolynsterk@welshwomensaid.org.uk**

¹⁷ <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168008482e>