



Welsh Women's Aid Consultation Response

Welsh Government consultation on draft statutory guidance on the National Training Framework on violence against women, domestic abuse and sexual violence under section 15 of the Violence against Women, Domestic Abuse and Sexual Violence Act Wales (2015)

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Introduction:

Welsh Women's Aid is the national charity in Wales working to end domestic abuse and all forms of violence against women. Established in 1978, we represent, campaign for, and support a national federation of local independent charities delivering specialist domestic abuse and violence against women prevention services in Wales, as part of a UK network of provision. These specialist services constitute our core membership, and between them they provide lifesaving refuges, outreach, and community advocacy and support to survivors of violence and abuse - women, men, children, families - and deliver innovative preventative work in local communities.

We also deliver direct services including the Live Fear Free Helpline; a national accredited and non-accredited training service in partnership with specialist services across Wales; refuge and advocacy services in Colwyn Bay and Wrexham; and the national *Children Matter* preventative project which supports our members to help children and young people in every local authority in Wales.

We have been at the forefront of shaping coordinated community responses and practice in Wales, by campaigning for change and providing advice, consultancy, support and training to deliver policy and service improvements for survivors, families and communities. As a national federation, our policy work, consultancy, training and advocacy is all grounded in the experience of local specialist services and service users. Our success is founded on making sure the experiences and needs of survivors are central to all we do.



Consultation Response:

Welsh Women's Aid welcomes the work undertaken to achieve this National Training Framework and has been involved in its development through representation at the Content Development Group.

Although the consultation documents states that there is "no national coverage of training...no agreed standards..." (page 2), it should be noted that Welsh Women's Aid (in partnership with UK Federations) developed the first suite of accredited qualifications and training designed for both specialist and non-specialist professionals in Wales.

- This suite, which is listed in the Qualifications and Credit Framework (QCF) for Wales, is a national training framework in terms of scope and qualifications, conforms to national training standards for accreditation (by OCN and Agored Cymru), and provides consistent effective and efficient delivery of high quality training in Wales that is aligned with UK training frameworks.
- Our Federations have also developed a 'train the trainer' course to support this delivery, and we deliver a range of accredited and stand-alone courses focusing on raising practice standards in specialist and public services.
- Welsh Women's Aid has recently combined our expertise in service delivery and training by bringing together a national partnership of sector-specialist trainers from regional independent domestic abuse/violence against women services. This team of associate trainers/assessors comprise the *Welsh Women's Aid National Training Service*. Partners hold training expertise in sexual violence and exploitation, domestic abuse, forced marriage, 'honour'-based violence, trafficking, FGM, safeguarding, substance use, mental health, supporting children and young people, domestic and sexual abuse in LGB&T relationships and amongst Black and minority communities, offender management, and individual/group perpetrator interventions

In addition to our response to core questions below, ***we suggest that the following summary recommendations are adopted*** in order to improve the training framework and subsequently the responses of relevant authorities, to prevent violence against women, domestic abuse and sexual violence in Wales.

Summary of key recommendations (further recommendations are included below):

1. Measures are needed to monitor whether the training is being utilised, to evaluate the impact of training undertaken on subsequent performance, and whether this in turn creates positive change for survivors of abuse.
2. Engagement with Group 6 professionals should be more targeted, and participation of leaders across public authorities should be monitored.
3. Further clarity on the specialist syllabus for Group 4 professionals is needed to ensure this is fit for purpose and does not create areas of duplication or privilege some providers over others. Welsh Women's Aid national qualifications (particularly the QCF certificate) should be also recognised as an alternate training requirement for IDVAs as well as for other professionals listed (see Q6 below). Children and Young People's Workers should also be included in this list of specialist roles, accompanied by WWA certificate requirements. *Children Matter* training for professionals working with children should also be used as pathways for professionals who require specialist knowledge but who do not work in specialist roles. The *Children Matter* training delivers preventative work



in all local authority areas and as such will be vital to support *Ask and Act* referral pathways for children and young people needing support. We would also recommend promoting access to University modules on 'violence against women' in Wales (further information can be provided on request).

4. Training on interventions with perpetrators should be aligned with the Respect Standard for the accreditation of perpetrator work, to ensure safety, consistency and quality with existing research and practice in this field.
5. Measurement tools for Group 1 professionals should be reviewed to ensure professionals are utilising e-learning effectively and that this training is supported by face-to-face training where necessary. Also, whilst increased confidence by professionals can be a good indicator, it does not always identify if the training has been successful; learners' confidence can also decrease post-training as they begin to understand the complex nature of a problem they had previously over-simplified.
6. Use of language should be reviewed within the guidance: more consistency and clarity is needed to ensure professionals understand the terms 'gender-based violence', 'violence against women', 'domestic abuse' and 'sexual violence', which are used interchangeably through the guidance. Violence against women should be clearly defined; definitions of domestic abuse, in particular, should also be consistent with definitions used by Westminster that includes coercive controlling behaviour.
7. Language that suggests the specialist domestic abuse and sexual violence sector is not yet professional when providing responses to survivors and their families, should be avoided e.g. reference is made to 'professionalising' the sector, which has in fact been working for over 40 years to respond to violence against women in Wales. We would recommend substituting this with 'strengthening' the sector, and would also suggest replacing 'inter-relationship' with 'intersectionality' in the guidance, as appropriate.
8. The likelihood of disclosure from a person receiving training is high. We recommend that guidance around responding to disclosure is also included in 'train the trainer' courses and for all regional consortia responsible for delivering the National Training Framework.
9. Although its scope does not apply to non-devolved service areas, the guidance should recommend the extension of this training to other relevant public authority and associated government professionals, e.g. Assembly Members, civil servants, and local councillors; community rehabilitation officers and national probation officers; police, magistrates and other legal professionals.
10. Acknowledgement and action is needed to address the lack of capacity and sustainability of specialist domestic and sexual violence services across Wales, which this year and next are facing proposed cuts in budgets at a local level. This means their ability to take referrals and offer ongoing support for survivors and families, as a result of 'ask and act' training, will be severely reduced. Roll-out of the National Training Framework will likely see a significant increase in disclosures and demand for support, and this needs to be carefully monitored and addressed throughout its implementation.



Responses to questions asked in the consultation:

Q1	Do you agree with the proposal for relevant authorities to outline how they will meet the requirements of the National Training Framework within a training plan?
	<p>1.1 There is a need for all relevant authorities and associated services to have consistent training, and Welsh Women's Aid is pleased that relevant authorities will be fully involved in outlining how they will meet the requirements of the National Training Framework. However, as raised through our oral and written evidence during the scrutiny stages of the Bill, we remain concerned by the 'opt out' clause for a relevant authority who <i>'thinks there is a good reason for it not to follow the guidance in particular categories of case or at all'</i>. We again recommend that the scrutiny of this by Welsh Government and the National Adviser should be robust and opt-out should only be allowed for those that exceed the stated standards.</p> <p>1.2 In addition to the proposals in this area, we would add that any training needs analysis should also include details of when any relevant training was introduced and when it was last updated. It is important that any previous training which is outdated or which now relies on discredited theories is effectively identified and updated, so that the most up-to-date, evidence-based learning is taking place. It may be appropriate for the National Advisor to take lead in this area to ensure that any courses that are already in place meet the standard of training that the National Training Framework is aspiring to achieve.</p> <p>1.3 We note it is not a requirement to undertake refresher training, although this will be offered. We recommend that if training updates have occurred, all staff should receive it, regardless of when any previous training has taken place. This will ensure consistency within organisations and across Wales.</p>

Q2	Which existing structures, boards or partnerships could best provide the strategic infrastructure for such work?
	<p>2.1 Regional training consortia should be established in each region across Wales that report to VAW regional boards and VAW strategic leads. We also recommend that a national training advisory group meets to oversee implementation of the statutory guidance. Where local safeguarding and other training consortia or partnerships already exist, consideration should be given to align with these so as to avoid duplication, whilst ensuring the focus on violence against women, domestic abuse and sexual violence training is not lost amongst wider safeguarding/POVA priorities.</p> <p>2.2 These consortia should comprise trainers already experienced in domestic abuse, sexual violence and violence against women. A survivor involvement framework should also be incorporated into structures, to ensure consistent, safe and effective participation in the development and review of training. The experiences and expertise of survivors and specialist services will be invaluable in ensuring good governance for training programmes, and that lessons learnt from survivors' experiences informs future delivery and practice. Welsh Women's Aid is developing a national survivor involvement project which could help enable consistent, trained survivor involvement in development, delivery and review of this programme at a national and regional level.</p>



2.3 As stated above, Welsh Women's Aid provides Agored Cymru accredited and non-accredited training in violence against women, domestic abuse, sexual violence. This is delivered by our national training partnership with specialist services across Wales. We would suggest in the absence of regional training consortia across the country, that this national training partnership constitutes an ideal existing structure for the National Training Framework to utilise and develop from, in areas without such partnerships currently in place.

Q3 Do you agree with the requirements proposed in relation to group 1?

3.1 Welsh Women's Aid is pleased that a wide range of professionals (Group 1) will be required to receive basic awareness training in violence against women, domestic abuse and sexual violence. This will help achieve the organisational, professional and cultural change needed to work towards its prevention. We recognise that eLearning is a cost effective mechanism to ensure that training reaches as many people as possible, however, there are limitations of e-learning tools (as acknowledged by the HMIC when reviewing the effectiveness of training on domestic abuse, for example). Face to face training often helps professionals understand the complexities associated with violence and abuse and we suggest that the guidance reflects the importance of accompanying group training. There have also been concerns expressed about the accessibility of online platforms to some individuals and organisations with limited access to the internet/computers; these organisations have suggested an 'off-line' equivalent be produced and monitored for those who request off-line options.

3.2 We are pleased that the eLearning provision will be included within induction programmes so that new employees receive training. We also strongly recommend that these eLearning sessions, for all learners, are not seen as a 'one off' exercise, but that follow-up and refresher lessons are offered and encouraged. Follow-up sessions (preferably not online based) will be particularly beneficial for those who receive e-training, as online courses can be difficult to apply to real life situations, or will not always answer specific questions a learner may have. As stated above, public sector inspectorates have highlighted the problems associated with e-learning, for example, key issues being misunderstood and participants 'click[ing] though training packages'.¹

3.3 We agree that confidence is key when spotting signs of violence against women, including domestic abuse and sexual violence. However, we question how measuring and monitoring professional confidence within this group will be effectively undertaken. We recognise this is a particularly difficult outcome to measure, especially given that Group 1 will only be receiving online training. It is also important to note that whilst confidence can be a good indicator, it does not always identify the true understanding of a learner or if the training has been seen simply as a tick-box exercise. Indeed there is some research to show that learner confidence can decrease post-training as they begin to understand the complex nature of a problem they had previously over-simplified (AVA Project, Stella Mental Health and VAW training evaluation).

¹ HMIC (2014) "Everyone's business: Improving the police response to domestic abuse". Accessed: <https://www.justiceinspectorates.gov.uk/hmic/wp-content/uploads/2014/04/improving-the-police-response-to-domestic-abuse.pdf>



	<p>3.4 We recommend the incorporation of a pre and post training online questionnaire. This would enable collation of data which could also be used to measure whether the training is effective in changing views on violence against women, including domestic abuse and sexual violence. It would also identify any areas where learners may be struggling and allow for different approaches to address this.</p> <p>3.5 We are pleased to note that the <i>Live Fear Free Helpline</i> is directly linked on the eLearning platform and will be provided ion supplementary resources for Group 1 professionals. This is a positive step which promotes that the helpline can also be used by professionals themselves who may be experiencing abuse and/or violence. Highlighting that all survivors – and professionals who support them – can call and access the <i>Live Fear Free Helpline</i> breaks down barriers for people from marginalised communities seeking support, by specifically highlighting that their needs will be understood if this number is called.</p>
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Q4	Do you agree with the requirements proposed in relation to group 2?
	<p>4.1 Welsh Women's Aid agrees with the requirements proposed in relation to Group 2 professionals, and welcomes the focus on training for public service staff who have direct contact with survivors. We would particularly welcome the inclusion of CAF/CASS Cymru on the priority training list – which has often been raised as a priority by specialist services and survivors and was a recommendation in the 2012 Rights of Women Report 'Picking Up the Pieces'.²</p> <p>4.2 We also support the integration of 'ask and act' training into existing training frameworks for continuing professional development across the public sector. With regards 'ask and act' training for group 2 professionals, we strongly urge that specialist services which already have training services are included in the membership of regional training consortia.</p> <p>4.3 The inclusion of the identification and response to children and young people, and of perpetrators of violence against women, domestic abuse and sexual violence, should be included in Group 2 and 3 professionals' training. For example, many perpetrators are in contact with public authorities already, especially health and social care services, and it is vital that professionals know how to ask and respond to abusers. Excluding this group from the training framework and associated 'ask and act' guidance is a significant gap in terms of achieving protection of survivors and prevention of abuse.</p> <p>4.3 We recommend that outcomes should reflect the reality of survivors of all forms of violence against women, and not only domestic abuse survivors. The monitoring of outcomes related to 'cessation of abuse' should align with longer-term achievement of independence and freedom for survivors, with public authorities working to common definition and goals with regards independence (as we advocate within our 'Change that Lasts' model and associated theory of change). Outcomes need to be meaningful and identify positive change created for survivors of abuse.</p>

² 'Picking up the pieces: domestic violence and child contact', Coy, M., Perks, K., Scott E., Tweedale, R., Rights of Women and CWASU (2012) http://rightsofwomen.org.uk/wp-content/uploads/2014/10/Picking_Up_the_Pieces_Report-2012I.pdf



	<p>4.4 We support the need to monitor outcomes that relate to 'referral rates to specialist services', as we have concerns about the capacity of specialist services to respond to increased demand for their support. However, we would suggest reviewing or clarifying the other suggested outcomes. For example, the measurement of 'cessation of abuse' amongst victims who are assessed as 'high-risk' of harm from domestic abuse perpetrators is misleading and arbitrary as the measure for this usually focusses on recent experience of incidents of 4 types of abuse. It also fails to recognise that whilst certain incidents may have ceased in the short term, fear and coercive control may nevertheless continue and survivors may not have had their needs met. Similarly 'repeat victimisation' rates for domestic abuse can create perverse incentives to ensure victims do not report to a service again in a 12 months period. Primary, secondary and tertiary prevention of abuse should be reflected in the resultant outcomes framework.</p> <p>4.5 We support the proposal for measuring the impact of training on performance. Research with survivors carried out to inform the Dept. of Health (Westminster) work on violence against women ('A Bitter Pill to Swallow') found "<i>those professionals that have been trained to safely ask women about domestic violence, like midwives and mental health professionals, are failing to do so</i>"³. It is important to monitor whether the training (for all groups) is being put into effect during day-to-day practice. This will not only record how effective the training is in practice, but will also allow for identification of areas of weakness, which can then be addressed.</p>
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Q5	Do you agree with the requirements proposed in relation to group 3?
	<p>5.1 Welsh Women's Aid agrees with the proposed requirements in relation to Group 3 professionals, who include those with a remit to respond to survivors; those involved in supporting colleagues in decision-making; or officer-level 'champions'. We agree that this training should be delivered by those who require specialist knowledge of violence against women, including domestic abuse and sexual violence, and agree that a combination of classroom and blended learning options would be appropriate. Our comments above and below also apply to Group 3 requirements.</p> <p>5.2 Training on interventions with perpetrators should be aligned with the Respect Standard for the accreditation of perpetrator work, to ensure safety, consistency and quality with existing research and practice in this field.</p>

Q6	Do you agree with the requirements proposed in relation to group 4?
	<p>6.1 Welsh Women's Aid broadly agrees with the requirements proposed in relation to Group 4 on specialist subjects and for specialist workers, subject to the additional recommendations below.</p> <p>6.2 It should be acknowledged that Welsh Women's Aid already has a national partnership of sector-specialist trainers from regional independent domestic abuse/violence against women services, as described above. Welsh Women's Aid national qualifications and <i>Children Matter</i> training for professionals working with children affected by abuse should be used as pathways for Group 4 professionals (see</p>

³ Women's National Commission (2010) 'A Bitter Pill to Swallow', DH.



	<p>below). The <i>Children Matter</i> training delivers preventative work in all local authority areas and as such will be vital to support <i>Ask and Act</i> referral pathways for children and young people needing support. We would also recommend promoting work to access University modules on 'violence against women' in Wales.</p> <p>6.3 Specific courses for specialist roles (page 42 – domestic abuse) should include all training providers which provide courses for the specified roles, not only those Welsh Government currently fund. For example, the Welsh Women's Aid/Women's Aid England course – <i>Certificate in tackling and preventing domestic violence and abuse</i> – has been endorsed by the Home Office as suitable for the <i>IDVA</i> role, equivalent to the CAADA IDVA training. As such this should also be included as an alternate specified training requirement for IDVAs in Wales. We are concerned to note that Welsh Government requires domestic abuse professionals (IDVAs) to acquire one provider's training as a condition of achieving funding, whereas the Home Office endorses multiple training providers' courses (ie they endorse Women's Aid England/Welsh Women's Aid certificate) for IDVA services funded by Westminster. We strongly recommend this is rectified and reflected in the Wales guidance.</p> <p>6.4 Similarly we note that training requirements specified for <i>Outreach workers/case workers, Floating support workers</i> and <i>Refuge/key-workers</i> also lists 'CAADA IDVA training' before Welsh Women's Aid certificate. However the former states explicitly this training is aimed at supporting "high risk victims of domestic abuse", whereas these professionals work within a needs-led service delivery model, irrespective of whether the perpetrator is assessed as posing a 'high-risk' of harm to victims. We strongly recommend that Welsh Women's Aid certificate courses continue to be recognised as primary training requirements for these professionals, given their work within needs-led provision and across risk.</p> <p>6.5 We would also like to see <i>Children and Young People's Workers</i> included in the list of professionals on page 42; at present they are notable by their absence. Welsh Women's Aid certificate for children's workers would also be relevant to <i>Children and Young People's Workers</i>.</p> <p>6.6 We would also like to see domestic abuse perpetrator/violence prevention workers included in the list of professionals on page 42. We recommend that perpetrator focused professionals are trained by Respect to ensure safety, consistency and quality with existing research and practice in this field.</p>
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Q7	Do you agree with the requirements proposed in relation to group 5?
	<p>7.1 Welsh Women's Aid agrees with proposals in relation to Group 5.</p> <p>7.2 Welsh Women's Aid has been supported by Welsh Government to roll-out the Wales National Quality Standards for domestic abuse services across specialist services in 2015/16. Reference in this section to the development of an appropriate quality assurance framework should, we recommend, acknowledged this work in Wales, in the final guidance document.</p>



Q8	Do you agree with the work streams outlined to engage and inform group 6?
	<p>8.1 Welsh Women's Aid is pleased to see that senior leadership are being engaged with the training framework and it is great to see that creative ways have been explored to engage this groups.</p> <p>8.2 However, we believe that this can be further expanded and improved to produce maximum impact. As it stands, there does not currently seem to be any accountability for this group aside from the overall local strategies. This has been broken down in more detail individually for each proposed engagement area.</p> <p>8.3 <i>Strategic Engagement Plan:</i> Whilst the ways in which this group are to be engaged are welcomed, we are concerned that there is no specific outline of how attendance and participation will be monitored. It has also not been made clear as to how many meetings/events as a minimum these professionals will be required to attend per annum.</p> <p>8.4 <i>Strengthening the Leadership Series:</i> This is a positive and diverse way in which to engage this group. Being available on YouTube also makes this training highly accessible, and we are very pleased to see this approach being used. However, we would question how participation and engagement will be measured for this type of training. It is vital that this series is not seen as a 'tick box exercise' but rather a way to ensure the importance of tackling these issues is understood; across all parts of an organisational structure. Monitoring (so results can be measured) is a key consideration to knowing if any impact is being made by the resources available.</p> <p>8.5 Welsh Women's Aid recommends making both areas of engagement with this group more targeted and to include more provision for monitoring of participation.</p>
Q9	Do you agree with the requirements proposed in relation to the specialist subject syllabus? <p>9.1 We are happy to see that all relevant authorities must ensure that all the training offered and attended by their organisation on violence against women, domestic abuse or sexual violence, must meet the learning outcomes specified in the specialist subject syllabus. This will help to ensure training is consistent throughout Wales.</p> <p>9.2 Although the appendix states that the details are currently only a draft of possible areas to be covered, we would welcome further consultation and involvement with the specialist sector on these. This will ensure they are fit for purpose and do not create areas of duplication, as they may do in the currently indicated form.</p>
Q10	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. Please enter here: <p>Language used in the Framework</p> <p>10.1 We are concerned that the phrases 'gender-based violence', 'violence against women', 'domestic abuse', 'sexual violence' and others have been used throughout</p>



the document, at times interchangeably. This is particularly evident in section 7, for Group 2 'Ask and Act', pages 26-30, where 'violence against women' appears to have been substituted for 'domestic abuse', 'sexual violence' and 'gender-based violence'. As most gender based violence is committed by men against women and girls⁴, for clarity we proposed that the term 'violence against women' should instead be used.

10.2 Welsh Women's Aid would also like the guidance to emphasise an understanding of 'violence against women' that is aligned with the international understanding of it being a cause and consequence of gender inequality and a violation of human rights. The phrase violence against women in the UK includes recognition of a defined group of specific crime types, as used by the Crown Prosecution Service amongst others, which encompasses individual crimes for which women's suffering is disproportionate, but of which men and boys can also be victims.⁵ Retaining this term throughout the national training framework is of fundamental importance and will help to reduce confusion and conflicting use of terms.

10.3 On page 2 of the consultation document, there is also mention of 'men who are abused by women'. Although this later explains that women are disproportionately affected by these types of violence and abuse, there is no equivalent mention within the introduction that this explicitly means that women are more likely to be the victims of abuse by men. This statement is borne out by the data on numbers of women killed as a result of male violence in the UK and should be explicitly mentioned in the introduction to create a proportionate understanding of the scale and nature of these types of abuse. This is also relevant in other sections of the consultation document, including page 19, where the disproportionate impact of these type of abuse on women and girls is mentioned, but the disproportionate role of men as perpetrators of abuse is not. In order to accurately reflect the nature of this abuse we would recommend this small change to name the agent of violence against women is made throughout the National Training Framework.

10.4 In relation to training for the specialist sector (Group 4 and 5) the language used in the consultation document refers to 'professionalising' the sector. As an alternative, Welsh Women's Aid recommends substituting this with 'strengthening' as the former seems to imply a current lack of professionalism within the sector. Although not intended, this could be perceived as derogatory and fails to acknowledge the 40+ years of experience many specialist services have.

10.5 Where 'inter-relationship' is used in the National Training Framework, Welsh Women's Aid would also recommend substitute this for 'intersectionality' to reflect the common phraseology for this phenomenon within the specialist sector.

Trainee disclosure

10.6 We know from experience and research that violence against women, including domestic abuse and sexual violence, is not rare. We know these issues are common

⁴ Violence against Women factsheet No239, World Health Organisation (2014):
<http://www.who.int/mediacentre/factsheets/fs239/en/>

⁵ 'Equality and Diversity Impact Assessment on the CPS Violence Against Women Strategy and Action Plan: Analysis of evidence - April 2008' http://www.cps.gov.uk/publications/equality/vaw/vaw_eia.html



and happening to many people in Wales, including within employees and trainees' relationships. For example, the data in the eLearning suggests:

- 'In a workplace with 4,000 employees, between 800 and 1,000 of the staff will have directly experienced domestic abuse at some point in their lives'.

Therefore the likelihood of a disclosure, especially during face-to-face training under the National Training Framework, is extremely high.

10.7 We recommend that guidance around disclosure is included for all Groups within the National Training Framework, and that specific training in this area is offered for face-to-face and 'train the trainer' courses. Due to Welsh Women's Aid's experience and position in the sector we are extremely well placed to provide this additional support, for example via the *Live Fear Free Helpline* or via local services.

Costs and increased pressure on specialist services

10.8 It is also imperative to recognise that violence against women, including domestic abuse and sexual violence, underpins many issues within society: it has roots in women's inequality and it is a fundamental violation of women's human rights. Its prevalence is reflected by high rates of public spending to protect survivors, with the resulting population-based estimates⁶ of the costs of domestic abuse suggesting this costs Wales £303.5m annually – £202.6m in service costs and £100.9m to lost economic output. There is also the significant impact of human and emotional costs resulting from this type of abuse, which estimates show an additional £522.9m cost for Wales annually.

10.9 To this extent, we expect a robust National Training Framework to have a significant impact in achieving better responses for survivors and ultimately an overall saving to the economy along with enhanced health and wellbeing in the general population. However, significant resources should also be dedicated to support for specialist services such as refuges, sexual violence services and other specialist services. Local specialist services 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 Wales, for example:

'We feel this would result in adding further strain to an already busy service both refuge and drop in /community.' (North Wales service)

'The refuge is a resource that is already oversubscribed, on average we get about 3 request for each room and that's on a slow day – for example today we had 6 requests for a room (which would accommodate one women and 3 children).' (South Wales service)

10.10 The violence against women sector has suffered from cuts along with other public services in recent years. This has occurred alongside a significant year-on-year increase in demand for services. Therefore increasing reporting as a result of such planned aspects of the National Training Framework such as 'Ask and Act' and public sector training will lead to increased pressure on these services. Provision should be made to address any increase in reporting to ensure victims and specialist services

⁶ Walby, S., The Cost of Domestic Violence: Update 2009.



are protected and supported to allow a holistic approach to implementation. Acknowledgement needs to be made, and action taken, to secure the capacity and sustainability of specialist domestic abuse and sexual violence services across Wales.

Scope of the guidance

10.11 Welsh Women's Aid welcomes the statement on page 5 of the consultation document that section 60 of the Government of Wales Act 2006 will be used to issue all but section 4 of the guidance. We hope that the wide-ranging powers within this section will be fully excised in order to increase the impact of the National Training Framework with all relevant persons resident in Wales.

10.12 The guidance should recommend the extension of this training to other interested public authority and associates government professionals, e.g. Assembly Members, civil servants, and local councillors; community rehabilitation officers and national probation officers; police, magistrates and other legal professionals.

Welsh Women's Aid would again like to thank the Welsh Government for the opportunity to comment on this important guidance and we look forward to working together on its implementation in the near future.

Any comments or questions regarding our response can be directed to:

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