

## Agenda Supplement – Equality, Local Government and Communities Committee

Meeting Venue:

Pierhead Building, Pierhead Street,  
CF99 1NA

Meeting date: 29 September 2016

Meeting time: 09.10

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Please note the documents below are in addition to those published in the main Agenda and Reports pack for this Meeting

### Private – Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence Act 2015: Consultation Responses

Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence Act 2015: Written Responses

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Attached Documents:

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PLVAW 06 – Gwent Police

PLVAW 07 – Gwent Violence Against Women, Domestic Abuse and Sexual Violence Regional Team

PLVAW 08 – Mid and West Wales Fire and Rescue Services

PLVAW 09 – Cwm Taf region

PLVAW 10 – The Survivors Trust (TST)

PLVAW 11 – Aneurin Bevan University Health Board



Cynulliad  
Cenedlaethol  
Cymru

National  
Assembly for  
Wales

PLVAW 12 – Association of School and College Leaders (Cymru) (ASCL)

PLVAW 13 – National Federation of Women’s Institutes–Wales

PLVAW 14 – City of Cardiff Council Response

PLVAW 15 – Flintshire County Council

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PLVAW 17 – Wrexham County Borough Council

PLVAW 18 – Both Parents Matter

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PLVAW 20 – Port Talbot & Afan Women’s Aid

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PLVAW 22 – ABM University Health Board

PLVAW 23 – Community Housing Cymru

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PLVAW 28 – Welsh Women Aid

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**Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a  
Chymunedau**

**Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais  
yn erbyn Menywod, Cam-drin Domestig a Thrais  
Rhywiol (Cymru) 2015**

**Ymatebion i'r Ymgynghoriad  
Medi 2016**

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**Equality, Local Government and Communities  
Committee**

**Post legislative inquiry into the Violence against  
Women, Domestic Abuse and Sexual Violence  
Act 2015**

**Consultation Responses  
September 2016**

\* Ar gael yn Gymraeg /Available in Welsh

<b>Rhif   Number</b>	<b>Sefylliad</b>	<b>Organisation</b>
PLVAW 01	Partneriaeth Diogelwch Cymunedol Gwynedd ac Ynys Môn	Gwynedd and Anglesey Community Safety Partnership
PLVAW 02	Gwasanaeth Tan ac Achub De Cymru	South Wales Fire and Rescue Service
PLVAW 03	Heddlu Dyfed Powys	Dyfed-Powys Police
PLVAW 04	Cyngor Bwrdeistref Sirol Pen-y- bont ar Ogwr	Bridgend County Borough Council
PLVAW 05	Llwybrau newydd	Pathways
PLVAW 06	Heddlu Gwent	Gwent Police
PLVAW 07	Trais yn Erbyn Menywod gwent, Cam-drin Domestig a Thîm Rhanbarthol Trais Rhywiol	Gwent Violence Against Women, Domestic Abuse and Sexual Violence Regional Team
PLVAW 08	Mid and West Wales Fire and Rescue Service's	Mid and West Wales Fire and Rescue Service's
PLVAW 09	Mae darparwyr gwasanaethau o fewn y Rhanbarth Cwm Taf	Service providers within the Cwm Taf Regio
PLVAW 10	Mae'r Ymddiriedolaeth Survivors	The Survivors Trust (TST)
PLVAW 11	Bwrdd Iechyd Prifysgol Aneurin Bevan	Aneurin Bevan University Health Board
PLVAW 12	Cymdeithas Arweinwyr Ysgolion a Cholegau (Cymru)	Association of School and College Leaders (Cymru) (ASCL)
PLVAW 13	Ffederasiwn Cenedlaethol Sefydliad y Merched-Cymru	National Federation of Women's Institutes-Wale
PLVAW 14	Dinas Cyngor Caerdydd	City of Cardiff Council
PLVAW 15	Cyngor Sir y Fflint	Flintshire County Council
PLVAW 16*	Comisiynydd Pobl Hŷn Cymru	Older People's Commissioner
PLVAW 17	Cyngor Bwrdeistref Sirol Wrexham	Wrexham County Borough Council
PLVAW 18	Both Parents Matter	Both Parents Matter
PLVAW 19	BAWSO	Bawso

PLVAW 20	Cymorth I Ferched paort Talbot AC Afan	Port Talbot & Afan Women's Aid
PLVAW 21	Atal y Fro	Atal y Fro
PLVAW 22	Abertawe Bro Morgannwg Bwrdd Iechyd	Abertawe Bro Morgannwg University Health Board
PLVAW 23	Cartrefi Cymunedol Cymru	Community Housing Cymru
PLVAW 24	Undeb Cenedlaethol y yfyrwyr Cymru	National Union of Students
PLVAW 25	Dinas a Sir Abertawe	City and County of Swansea
PLVAW 26	Hywel Dda Health Board	Hywel Dda Health Board
PLVAW 27	Barnardo's Cymru	Barnardo's Cymru
PLVAW 28	Cymorth I Ferched Cymru	Welsh Women Aid
PLVAW 29	Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot	Neath Port Talbot County Borough Council
PLVAW 30	Ddiogrlach Cymru	Safer Wales
PLVAW 31	Y Gymdeithas Genedlaethol er Atal Creulondeb i blant	National Society for the Prevention of Cruelty to Children

PLVAW 01

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Partneriaeth Diogelwch Cymunedol Gwynedd ac Ynys Môn  
Response from: Gwynedd and Anglesey Community Safety Partnership

**1. To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

I can only speak on behalf of the Local Authorities with whom I am actively engaged, however I can state that as a result of this legislation, I have witnessed some substantial cultural shifts within one of the Local Authorities in particular, with whom I am engaged.

Another accepts the duties and obligations that will arise as a result of this legislation, especially pertaining to **section 5** (duty to prepare a local strategy) and statutory guidance under **section 15** (National Training Framework), however owing to the duties and obligations arising from the Wellbeing of Future Generations Act, the Housing (Wales) Act and the Social Services and Wellbeing Act simultaneously, are far more pragmatic in their approach. Despite the differing approaches taken, every effort has been made within the past twelve months to raise awareness with Chief Executive Officers, Service Leaders and Managers, of the National Training Framework and the obligations that lie ahead.

However, what I will say is apart from the culture shift seen within one organisation whom I am working closely with, as a result of awareness raising of this Act, I cannot say whether the legislation itself is having any impact on organisations.

The reasons that I believe for this are due to poor communication, technical difficulties and substantial lack of any form of clarity or direction from Welsh Government.

In reference to the National Training Framework on Violence against Women, Domestic Abuse and Sexual Violence, no member of staff I have been working with has been able to gain access to the Level 1 e-learning module, due to the technical issues that appear to have arisen as a result of the transfer of the license for hosting e-learning from the All Wales Academy to the NHS E-learning site.

This technical issue has been ongoing for a period of over eight months and is causing a great deal of consternation and frustration. It appears that neither Gwynedd nor Anglesey will achieve the 50% completion rate target by 31<sup>st</sup> March 2017 as a result.

Furthermore, similar problems have arisen with regard to Levels 2 and 3 of the National Training Framework, where Local Authorities are expected to develop Ask and Act policies, appoint Ask and Act Leads and contact officers, appoint individuals to form part of a Regional Training Consortia to deliver training, and arrange for designated members of staff to receive the said training either as a stand-alone training package or as an integrated package with safeguarding training.

Again, Local Authorities are expected to have outlined how this training will look like within their organisations in a regional training plan to be submitted to Welsh Government by 31<sup>st</sup> March 2017, and yet despite this timescale, there has been no communication, direction or clarification from Welsh Government as to how they envisage this training to be developed, ie. will it be developed by Welsh Government or is there an expectations that Local Authorities devise their own Ask and Act via a Regional Workforce Development Group for instance?

The lack of communication and progress on the issue is disheartening.

Despite obtaining the commitment of several service departments to trial and initiate the e-learning and Ask and Act, progress cannot be achieved due to technical difficulties and lack of communication as to Welsh Government's intentions in respect of the Ask and Act. As a result, this is not only hampering progress but momentum.

**2. What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences and to what extent is this information being used to help inform the implementation of the Act's provisions?**

I am not sure as to the most effective methods of capturing service user experience. I would suggest that in order to make the best possible use of service-user feedback in order to develop ideas as to how to improve services, a regional or national network be developed, comprising of individuals who are engaging with services but who have surpassed crisis intervention and are no longer considered high risk.

**3. Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

Due to the fact that my core work is strategic and owing to the problems that have arisen with regard to sections 5 and 15 of the National Training Framework (which would offer opportunities to increase disclosure rates), I feel it is too early to speculate as to whether the Act has had a noticeably beneficial impact on service users requiring specialist assistance from public authorities. However, I can say with certainty that awareness around Violence against women, domestic abuse and

sexual violence within the two authorities whom I am engaged with has increased dramatically over the past twelve months, as a result of raising awareness of the Act.

I would add however that some non-frontline service departments have demonstrated little awareness of the Act, in contrast to the Wellbeing of Future Generations Act and the Social Services and Wellbeing Act therefore I suggest perhaps that some consideration be given to the development of promotional material that might highlight this piece of legislation.

**4. Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

Again, I feel it is rather early to speculate as to whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act, in practice.

In principle, I would agree that the National Adviser is sufficiently independent from Welsh Government as to make informed, impartial and sound evidence-based judgements and recommendations, free of influence, and early indications thus far, would appear to support that assessment.

Furthermore, the National Adviser has thus far demonstrated a strong commitment to the inclusion of service user engagement in the improvement of services and has also shown a willingness to listen to the concerns of service providers and strategic leaders in this area.

The National Adviser will be supporting the transition to regional strategic leadership, by becoming a member of a regional group that will oversee the development of a Regional Training Plan, Regional Training Consortia and the appointment of a Regional Advisor in North Wales. The National Adviser's involvement will be considered welcome and crucial to ensuring that the transitional process is as transparent and as accountable as possible.

**5. To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

As my core work is strategic, I can only evidence this assessment with data and information fed-back to me via service providers involved in the delivery of this work.

However, I can state with clarity that qualitative and quantitative data has consistently shown that schools-based intervention on healthy relationships has had a marked positive effect on children and young people, with one such regionally-commissioned programme once having contributed to a Police disclosure, later followed by a successful prosecution.



Statistics consistently show that such intervention programmes are crucial in educating children and young people about issues relating to domestic abuse, sexual offences, child sexual exploitation and consent.

While I certainly agree that these programmes are fundamental to changing attitudes and have consistently shown a positive effect on young people, I feel it is too early to speculate whether the formulation of the Act and the whole school approach has improved attitudes further.

I would however expect in the coming years for the whole schools approach to considerably strengthen and improve schools-based intervention programmes further as the ethos becomes embedded within current educational practices and culture.

I would add however that in the same vein, it is also crucial to develop age-appropriate programmes for younger children of primary school age, who may be experiencing domestic abuse at home, as this constitutes a child protection issue. Whether this takes the form of programmes designed to encourage young children to speak out to appropriate adults, such as teachers about abuse taking place at home; or whether the programme should consist of training to identify signs and symptoms within children and strictly following the Child Protection procedures as a result, I feel some age-appropriate intervention for teachers, and/ or primary school age children should be considered, as many Child Practice reviews, statistics and data has shown a link with child abuse and domestic abuse.

For these reasons, I feel it is crucial to target children as well as young people as to how they can obtain support and protection.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,

Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,

Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Gwasanaeth Tan ac Achub De Cymru

Response from: South Wales Fire and Rescue Service

1. To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?  
To improve the service SWFRS provide we are providing 24/7 cover for target hardening in cases where arson has been threatened. The aim of the team is to attend properties within 2 hours to provide the TH service to allow victims to remain in their own homes.  
SWFRS are now also reporting to several UA MARACs. We report any interventions/interactions we have had with the names and addresses provided through the MARAC agenda. This information helps to ensure that a full history of both the victim/perpetrator and addresses are provided from a Fire Service perspective.
2. What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?  
SWFRS do not capture views from survivors at present, however, after meeting with colleagues in London Fire brigade to witness a project they have started with survivors and their children which provides them with a safe environment to talk, learn life skills, team build and help to improve their confidence, we are now initiating a project to trial this in the Newport area.  
The young people are able to participate in the Young Fire Fighter/Cadets programme and receive recognised award at the end of the course.  
From this we will also collate evidence from survivors to inform future events so that it better meets their needs and those of their children.
3. Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?  
SWFRS – as point 1
4. Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?  
SWFRS – Unable to comment

5. To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?

SWFRS have introduced a session on Healthy Relationships into all 10 of its Young Fire-Fighter courses.

The YFF course is aimed at young people between the ages of 13-18. It is held weekly and runs for 2 years after which the attendees attain a BTEC qualification.

All YFF branch managers and course instructors have also received bespoke training on the same subject and how to signpost young people who make disclosures.

- To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?

It is too early to assess the impact of the act as the operational structures and framework for delivery have yet to be established. The consultation events have yet to be held (scheduled for September) and local authorities and health boards have yet to fully establish how they will deliver against the act. Governance structures are being reviewed within Dyfed-Powys area to ensure they align with the provisions of the act. Leads from the relevant authorities have not been appointed across all agencies.

- What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?

Each Police Force has a requirement, directed by the Home Office to develop a victim survey in respect of DA. The survey work is in the process of being scoped, but will only consider police response as opposed to all agencies.

A wider qualitative approach would be welcomed.

- Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?

The funding of specialist services such as IDVAs is uncertain and Home Office Funding is likely to be removed. The Police and Crime Commissioner has requested a meeting with partner agencies to consider joint commissioning of services. The funding of such arrangements will need to be agreed in due course.

- Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?

It is felt that the National Adviser has the independence but as the name suggest, they can only advise and do not carry the authority to ensure implementation of the Act.

- To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?

No information to provide.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr

Response from: Bridgend County Borough Council

- **To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

**1.1** It is our opinion that it is too early as local authorities have been awaiting the national strategy to be able to inform the local strategy. Given that we have only recently received the national strategy document and are now engaged in a consultation process, it will be sometime before the main objectives of the legislation become actions within local strategies and delivery plans.

**1.2** The act has been useful in raising awareness of VAWDASV however, it is our opinion that the Social Services and Wellbeing Act 2015 has been more widely publicised and this has been the main focus for partners. A document from Welsh Government that aligns both pieces of legislation alongside the Future Generations Act would be very useful.

**1.3** In relation to the NTF, while the supplementary guidance has been useful the rollout has been problematic due to IT issues and licences. Some issues surrounding the practicalities of training all staff as required by the legislation have yet to be resolved and the deadlines initially set by Welsh Government for completion of Group 1 were unachievable. Similarly the learning from Group 2 (pilot sites) is unlikely to be available until January 2017. This means the training delivery plan date of May 2017 may be unachievable also.

**1.4** VAWDASV team at Welsh Government has undergone a number of significant staff changes since the legislation achieved Royal Assent this has affected the momentum of the delivery.

- **What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences and to what extent is this information being used to help inform the implementation of the Act's provisions?**

**2.1** In Bridgend, the commissioned service Calan DVS are responsible for collating service user feedback.

**2.2** Service users views were sought on the recommissioning (2014-2015) of services using a mixed method approach, i.e. focus groups, semi-structured interviews, quantitative questionnaires – online and paper-based. Service user views are always sought when introducing a new or changing a service. Service user feedback is also undertaken through Supporting People reviews which are fed back to the service provider. Focus groups were awkward and repeating this method would require careful consideration.

**2.3** Many survivors are unaware that the Act exists.

- **Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

**3.1** Given that the rollout of the NTF is still in its infancy and we are still awaiting statutory guidance in respect of Ask and Act along with the learning from pilot sites. Again it is too early to assess the impact.

- **Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

**4.1** It is not possible to assess the power and influence that this post has until there is a situation where a challenge has been brought to light. However, it is noted that the National Adviser has been proactive in meeting with local authorities and other bodies to raise awareness of the VAWDASV legislation and has offered to support in development of the local strategies.

**4.2** The post is funded by Welsh Government.

**4.3** What sanctions have been set in place for LAs or responsible authorities for non-compliance?

- **To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

**5.1** This is again too early to assess. The take up of the Spectrum Project, although improving recently, take up has been slow.

**5.3** The Estyn Thematic Review mentioned by Welsh Government to take place during 2016/17 has not as yet been undertaken? This review will be key to the success and focus of schools going forward.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015  
Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015  
Ymateb gan: Llwybrau newydd  
Response from: New Pathways

1. To what extent is the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations of the Act.

New Pathways is not able to identify a significant improvement to the approach to tackling violence against women, domestic abuse and sexual violence in recent months and would be reluctant to conclude that any improvement that has been observed is the result of the obligations of the Act. This is not to say that New Pathways does not feel that the obligations of the Act could well lead to a significant improvement but we feel that it would be premature to make an assessment of this nature at this time.

2. What are the most effective methods of capturing the views and experiences of survivors?  
Are arrangements in place to capture these experiences, and to what extent is the information being used to help inform the implementation of the Act's provisions.

New Pathways feels that it is important to involve survivors in the development of specialist services wherever practical and possible. New Pathways acknowledges that a consideration of survivors' views and experiences is crucial and may well be the best possible way to inform the implementation of the Act's provisions. New Pathways currently facilitates the sharing of survivors' views in a number of ways including the use of evaluation and feedback forms, on-line surveys and regular forums. It is only with engagement with our own client group that we can be sure that we are continually developing and enhancing the most appropriate range of specialist client services. However, New Pathways does not feel it would be appropriate, at this stage, to ask survivors about specific elements of the implementation of the Act's provisions. It is our understanding that most clients would currently be unaware of the specific legislation and intentions of the Act.

3. Are survivors of abuse beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services.

New Pathways feels that it would be premature to assess whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act. New Pathways does not feel that it would be appropriate to question survivors directly about any changes that have resulted from the Act at this stage.

4. Does the National Advisor have sufficient power and independence from Welsh Government to ensure the implementation of the Act.



New Pathways does not feel that the National Advisor currently has sufficient power and independence from Welsh Government to ensure the implementation of the Act. New Pathways feels that it is too early to assess the impact of the National Adviser to date. However, New Pathways does feel that it is crucial for the National Adviser to have sufficient power and independence from Welsh Government in order to ensure the successful implementation of the Act going forward.

5. To what extent is the Good Practice Guide to Healthy Relationships successfully influencing the development of a whole school approach to challenging VAWDASV.

New Pathways does not feel equipped to respond fully or meaningfully to this question at this time. New Pathways feels that it would be difficult to measure the extent to which the Good Practice Guide to Healthy Relationships has successfully influenced the development of a whole school approach to challenging VAWDASV. While it is clear that there is now an imperative for all schools to challenge VAWDASV and to actively promote healthy relationships it is not clear whether all schools have responded with the same level of enthusiasm and whether a truly consistent and cohesive whole school approach now truly exists. While this situation may become clearer in time it is unlikely that New Pathways, or other similar organisations, will be able to comment on this meaningfully in the future without access to data which contrasts the impact of the Good Practice Guide across different schools and different areas.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015  
Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015  
Ymateb gan: Gwent Heddlu  
Response from: Gwent Police

1. To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?

It is very early in the development of the approaches required under the Act to be able to measure any improvement in responses. From our experience, working within the pilot region in Gwent/ South East Wales, there is varying understanding of the obligation on the statutory bodies of the obligations put upon them by the Act. This limits any progress required under the Act. The Police as a non - devolved body are not obligated under the Act but we are clearly an important stakeholder in all that the Act aims to achieve and it is within our core aims and commitment to do so. Our approaches to Violence against Women, Domestic Abuse and Sexual Violence continue to develop and improve. We do this with both statutory and voluntary sector partners.

Gwent as a pilot region has undertaken significant work to make progress under the Act. This includes the regionalisation of the Violence against Women, Domestic Abuse and Sexual Violence team replacing the local Domestic Abuse Coordinators. This team leads on much of the action required including the implementation of Ask and Act, needs assessments and supporting understanding of obligations required by the Act. It is a significant amount of work. The team is still new and much of the work is 'in-progress' rather than completed. This is to be expected and is very much a positive step or steps. However, a consequence of the regionalisation is that the local Domestic Abuse Coordinators do not exist and some of the work done locally no longer happens. There has also been an actual reduction in the number of dedicated staff. This is a step back, one that may become insignificant and compensated for as matters develop but it is the current situation.

A further restriction on progress has been the coincidence of this Act with the Social Services and Well Being (Wales) Act 2014 and the Well-Being Future Generations (Wales) Act 2015. There has been a singular approach to the introduction of each act with some later consideration on the joint approach to meet the goals and requirements of all 3 pieces of legislation. The fact of implementation of the 3 pieces of legislation has been that the implementation of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 has

been weakened. To be realistic, austerity measures, increasing obligations and multiple demands on the same people will have implications. That is not to say that these cannot and will not be overcome but they have impacted the early progress of approaches for this Act.

2. What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?

There are mechanisms and methods at organisational and regional levels for capturing victim and survivor views and experiences. There has been some consultation for the National Strategy for the Act. This has been done by Welsh Women's Aid to inform the strategy and is the introduction of a different methodology and model of survivor empowerment as facilitators of engagement and consultation. This is most survivor centered and effective method of capturing information. Currently beyond the strategy, there is no other survivor consultation that specifically informs the implementation of the provisions of the Act. Survivor consultation is important to support all work and should not be restricted in facilitation to one organisation.

3. Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?

Points made under question 1 are also relevant to this question. Very limited numbers of staff have had any training through the National Training Framework. Those that have will be in a better place to identify those needing support, provide information and support and signpost on to specialist services.

In addition, the Act is not about making additional resource available but is focused on 'doing things better'. This approach will take time for the positive impact to be felt by survivors.

Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?

The National Adviser's power is limited by capacity. Her 'team' consists of 1 part time person. If we look at what she needs to achieve, the accountability and monitoring responsibilities and consider what work is required to enable this it becomes clear that more capacity is required. If we look to other legislation being implemented the human resource to support

implementation, oversight and scrutiny is many times more. This needs very careful and realistic consideration.

4. To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?

The good practice guide is a very good collection of good practice examples of single projects. There is the Spectrum Programme and the Schools Liaison Programme as well as other programmes providing input in schools. These can form part of a whole school approach but not all. The guide will support development by staff that have expertise, understanding and motivation to do this work and the time to do it. We must limit our expectation that teaching staff will be the experts in delivering this. A ready to deliver, age appropriate curriculum (to be integrated into the National Curriculum) has far more chance of being used and support a successful adoption of a whole school approach throughout all schools.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Trais yn Erbyn Menywod gwent, Cam-drin Domestig a Thîm  
Rhanbarthol Trais Rhywiol

Response from: Gwent Violence Against Women, Domestic Abuse and Sexual  
Violence Regional Team

**1. To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

There are many aspirations of the approach to tackling violence against women, domestic abuse and sexual violence seeks to improve as a result of the obligations in the Act however, it is still the early stages of post legislation and therefore improved results will evolve over time.

The Act seeks an improved collective public sector response, stronger leadership and a more consistent focus on the way we tackle these issues in Wales, but more importantly it seeks to stop the abuse happening in the first place.

The Gwent VAWDASV Regional Team are working with partners to ensure a shared, collective strategic vision, with the development of a Regional Strategy. The Regional Team will raise awareness of Gender-based Violence, Domestic Abuse and Sexual Violence with our most senior leadership, and place a responsibility on them to drive forward changes which improve the safety of victims and their children.

Under the Act, Local Authorities will be required to report how they are tackling these issues in the schools in their area , for example through lessons on Healthy Relationships.

The approach to tackling violence against women, domestic abuse and sexual violence will hold senior leaderships accountable for these issues. There will be requirements on Local Authorities to produce data on how Education settings tackle violence against women, domestic abuse and sexual violence through a preventative approach of Healthy Relationship sessions.

Ask and Act, a key component of the National Training Framework will bring an innovative approach to identifying those affected by violence against women, domestic abuse and sexual violence.

Despite the obligations on partners under the Act, there is lack of clarity around long term funding. Whilst partners accept that there are obligations of the Act, Welsh Government should be realistic around expectations of what can be delivered and what can be achieved. Funding is a clear issue, and additional funds have not been given to meet the obligations of the Act. The uncertainty of year on year funding is indicative for all specialist services across the Region, a clear example of this would be sourcing funding for a Regional IDVA service. The expectations are that these funding sources should be mainstream but, organisations are not able to provide this funding, and in terms of long-term sustainability, it would leave organisations in jeopardy.

The Regional Model in Gwent and the previous work of the Pathfinder project 2014 has been a learning curve and a shift in culture in addressing violence against women, domestic abuse and sexual violence issues. The Gwent violence against women, domestic abuse and sexual violence Board brings partners across the region together to tackle the issues and support the strategic objectives set out in the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 to ensure that services are working together to support and protect victims and to prevent violence against women, domestic abuse and sexual violence across the region as well as to inform and shape learning across Wales.

Gwent are in a unique position in that as a pilot region there have been opportunities to embed some of the violence against women, domestic abuse and sexual violence approaches earlier than other regions across Wales and over the last year Gwent have been at the forefront of the obligations ahead. However, there is still much to do in raising awareness of the Act and key stakeholders understanding the requirements upon them.

It is hoped that the National Strategy will bring the framework for strong strategic delivery for best practice in Wales to fulfil preventative, protective and supportive mechanisms.

Organisations will require guidance to tackle issues of violence against women, domestic abuse and sexual violence to ensure successful outcomes are achieved in terms of consistency and working in partnership. The Gwent Regional team consulted on a multi-agency consultation document last year, but there has been no direction as to what the next steps are. Guidance is needed in order to understand what we are working towards.

There is confidence that the new legislation and its approach will tackle the issues of violence against women, domestic abuse and sexual violence across Wales, albeit in due course and perhaps not at the same pace for all regions.

**2. What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences and to what extent is this information being used to help inform the implementation of the Act's provisions?**

Understanding how survivors of domestic abuse, sexual violence and other forms of violence against women use and experience public services is key to improving the effectiveness of prevention, protection and support services and systems in Wales.

Survivors' voices and experiences must also be central to informing the development and delivery of legislation, policy and strategy in order to ensure systems and services best meet survivors' needs and action is taken to prevent violence and abuse in the short and longer term.

All specialist areas engage with survivors in a safe and meaningful way to capture their views and experiences and most effective methods can be through research based guidance on engaging with victims. We must also be mindful it is equally important how we engage with male victims, young people and children, those who are not engaging with services and perpetrators. These views and information also help to inform the implementations of the Act's provisions.

One of the main objectives of the South East Wales violence against women, domestic abuse and sexual violence regional action plan is to develop a structure for service user/survivor by April 2017. We will consult with existing survivor groups, map current engagement mechanisms across the region and establish a service user/survivor groups and incorporate this with the SEEDS steering group.

**3. Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

This question is difficult to answer in a meaningful way at this stage. The training within Groups 2 and 3 of the National Training Framework – ‘Ask and Act’ are still in pilot stages with Gwent imminently launching the pilot training for Local Authority Staff. With this pilot not yet in full flow and only one other pilot site in Wales under taking training which is designed specifically to ensure better responses to survivors, it is not possible to measure this as yet.

While this is in the early stages of development there is ongoing work developing full and detailed survivor engagement work, which will provide the basis and platform to analysis ‘ask and act’s effectiveness and impact on survivors experiences. Within Gwent this is being done via a sub group of the South East Wales – Violence against Women, Domestic Abuse and Sexual Violence Board where ongoing engagement, consultation and contact with survivors will help inform the wider agenda of the board moving forward. We are also undertaking work with Welsh Women’s Aid in a pilot of the SEED’s Project across Gwent.

**4. Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

The National Adviser for violence against women, domestic abuse and sexual violence is independent from Welsh Government. This allows for an informed perspective on work to develop, shape and implement policy and legislation in Wales and drive forward improvements in the responses of public bodies and the voluntary sector to all forms of Violence against Women, other forms of Gender Based Violence, Domestic Abuse and Sexual Violence. There is clear independence in the work of the Adviser and the role is influential in implementing this ground breaking piece of Legislation.

The National Adviser has limited recourse from the Welsh Government to fully ensure implementation of the Act. The National Adviser is the voice of violence against women, domestic abuse and sexual violence issues in Wales, however, the Adviser’s role is on a part time basis and there is no Commissioner for the violence against women, domestic abuse and sexual violence agenda. There is scope for further resources for the National Adviser from Welsh Government which would bring greater consistency to the violence against women, domestic abuse and sexual violence agenda. It is also recognised that the National Adviser should be able to replicate all work relating to violence against women, domestic abuse and sexual violence nationally, however, the capacity to enable this to happen is limited due to the resources that have come with the passing of this Act.

It is also important to be mindful of other recent legislations that have been passed by Welsh Government during the same time period as the violence against women, domestic abuse and sexual violence (Wales) Act 2015. The Social Services and Wellbeing Act 2014 and the Future Generations Act 2015 are two major pieces of legislation to be passed in Wales and although these legislations complement one another, the passing of these Acts has been a challenge for the violence against women, domestic abuse and sexual violence (Wales) Act 2015 to contend with and raising the profile of this agenda.

**5. To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

At present, the development of the whole school approach is still in its infancy. The good practice guide is a useful starting document in giving schools direction and inspiration to start considering a shift to a whole school approach however, more resources like the good practice guide will be needed by education settings to fully establish a whole school model.

The whole school approach is a new challenge for schools and a transformation for many in how they deliver healthy relationship education. The shift to a whole school approach will be a lengthy process that will take time to develop and schools will need to be supported in the development of the model. It is acknowledged that schools settings across Wales will vary in their landscape and in needs and it is imperative that time and understanding is given to schools to allow them to develop a whole school approach that meets the needs of their setting and meets the obligations of the violence against women, domestic abuse and sexual violence (Wales) Act 2015.

Recognition must be given to Welsh Government for working in conjunction with Welsh Women's Aid in producing the good practice guidance. Working collaboratively with the specialist sector allows for innovative and contemporary work that is required to adopt a new model and where possible the opportunity to work in partnership with specialist sectors should be taken when producing guidance documents.

Whilst the good practice guide has been welcomed by educational settings, successfully developing the whole school approach is far greater and goes beyond good practice guidance. There must be considerable attention given to the duties on the Local Authorities and ensure that the requirements upon them are followed through. To develop a whole school approach, Local Authorities must be held accountable for producing information and data on how and what schools are doing to tackle issues of violence against women, domestic abuse and sexual violence. Although guidance documents will be imperative for a successful whole school model, we must not lose sight of all obligations of the Act on Education, which will be the success of a whole school approach.

There is still considerable work to engage schools in the understanding and the concept behind the whole school approach. Education settings still need to grasp the idea of having a whole school approach and the obligations of them under the Act. It is important that schools are fully informed of the violence against women, domestic abuse and sexual violence (Wales) Act 2015 in order to successfully influence a whole school approach. Welsh Government will need to invest in schools and resources and further guidance will be required for schools to meet their requirements.



Some schools are currently receiving Healthy Relationship session through Welsh Governments' Spectrum project however, this is sporadic and relevant education inspections need to be carried out to assess where schools are at to move forward successfully now that the Act is one year post legislation.

Welsh Ministers will need to utilise their powers in developing guidance for schools in order for all schools in Wales to reach a consistent whole school model.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Gwasanaeth Tân ac Achub Canolbarth a Gorllewin Cymru a  
Response from: Mid and West Wales Fire and Rescue Service (MAWWFRS)

Mid and West Wales Fire and Rescue Service's observations on the five specific questions raised on the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 are noted below.

We feel that as a Fire and Rescue Service we have an important role to play in promoting VAWDASV awareness, supporting high profile events such as White Ribbon and in ensuring our staff have the necessary training and support so that they are aware and can 'Ask and Act' as appropriate.

There are some areas of the Act that we have a lesser role but we will continue to support our partners who have responsibility for delivering these improvements.

**1.1 To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

The Act has provided an all Wales focus for Violence against Women, Domestic Abuse and Sexual Violence and has delivered a training framework for public services to use in raising awareness and knowledge across all employees. This has provided a standard approach for the Fire and Rescue Service and training materials to raise awareness.

**1.2 What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?**

Raising awareness of Violence against Women, Domestic Abuse and Sexual Violence within the community will encourage survivors to share their experiences. Any information provided to the Fire and Rescue Service during the course of our work will be referred appropriately.

**1.3 Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

Capturing this information could be achieved through standard evaluation of survivor experiences

**1.4 Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

The Fire and Rescue Services relationship with the National Advisor has been limited to the provision of advice and guidance on the implementation of the training framework. The National Advisor has been very supportive in this role.

**1.5 To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

Fire and Rescue Service is unable to comment directly on the guide but our experience of schools' education to influence and educate on our traditional areas of focus has seen very positive outcomes.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,

Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Mae darparwyr gwasanaethau o fewn y Rhanbarth Cwm Taf

Response from: Service providers within the Cwm Taf Region

This response has been prepared on behalf of a number of organisations who either provide or are involved with services for tackling violence against women, domestic abuse and sexual violence within the Cwm Taf region

Our comments are as follows.

- **To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

**1.1** The general opinion of service providers in Cwm Taf is that it is too soon to be considering the impact of the VAWDASV Act in relation to service improvement. Most Local Authorities have been waiting for the publication of the National Strategy to inform their local strategies. Although local delivery plans are already focused on the key elements of the Act the National Strategy has only recently been released for consultation. Therefore, it will take time before all of the objectives of the Act become actions in a Cwm Taf strategy and delivery plan. It is our understanding that local strategies are required to be in place by May 2018.

**1.2** Whilst the Act has yet to make an impact on service improvement in Cwm Taf it has been a positive tool in raising awareness of the responsibilities of Local Authorities and Health Boards in relation to VAWDASV.

**1.3** The National Training Framework associated with the Act, hopefully, will ensure widespread awareness of the issues. The Cwm Taf region are currently focusing on development of a programme of roll out of stages 1 and 6 (which is in its infancy) and starting to think about the development of its training plan as required under the Act in order to meet the May 2017 deadline; However it is too early to assess impact.

- **What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences and to what extent is this information being used to help inform the implementation of the Act's provisions?**

**2.1** In Cwm Taf it is our view that in order to successfully capture service users views a range of methods need to be offered as one size does not fit all. Cwm Taf providers offer a variety of engagement approaches including drop in groups, evaluation forms, on line surveys and occasional consultation workshops. Whilst there are mechanisms in place to capture service user's views the provision of engagement opportunities is not consistent across all services.

**2.2** Service user views on the implementation of the Act have not been sought recently as local strategies have yet to be developed. Service User views will be asked for in the near future in order to inform the Cwm Taf VAWDASV needs assessment, which in turn will inform the commissioning of service provision.

**2.3** The view of local providers is that many service users are currently unaware of the legislation and its intentions. It is intended to rectify this across Cwm Taf with active engagement and consultation for the aforementioned needs assessment and in addition consultation on the draft Cwm Taf Regional Strategy.

- **Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

**3.1** Leadership and Accountability has improved and in Cwm Taff a VAWDASV Executive Group has been introduced. However, as outlined in Paragraphs 1.1 and 1.3 it is too early to see notable changes as progress is still in its infancy, although focus has shifted to a robust needs assessment, strategy development and then appropriate commissioning strategy. At this current time it is fair to say though that services have not been changes as a result of the Act, therefore service users will not be experiencing better responses that can be directly attributed to the Act.

- **Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

**4.1** This is a difficult question to address as we are unaware of a situation where the National Advisor has had to challenge either Welsh Government or other public bodies. However we are aware the Regional Advisor is involving themselves in matters with key public bodies to ensure that the Welsh context is understood, particularly in relation to the Act. It is difficult to assess whether the National Adviser has sufficient independence or power. However it could be suggested that it is difficult for the National Adviser to be completely independent from the organisation that employs her.

- **To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

**5.1** Again it is rather too early to assess the influence that the good practice guide is having upon schools as many schools have only become aware of the guidance very recently.

**5.2** In Cwm Taf briefing papers have been developed for school governors and school safeguarding groups to ensure that they are aware of the whole school approach to VAWDASV. The next step will be to determine what schools are currently delivering in relation to this agenda and where there are gaps in provision.

PLVAW 10

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015  
Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015  
Ymateb gan: Mae'r Ymddiriedolaeth Survivors  
Response from: The Survivors Trust

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### **Response from The Survivors Trust.**

The Survivors Trust (TST) is a national umbrella agency for over 140 specialist rape, sexual violence and childhood sexual abuse voluntary sector support organisations throughout Wales, England, Scotland and Ireland.

We are the largest network of Organisations delivering rape, sexual violence and sexual abuse support services within the UK.

In Wales, The Survivors Trust operates under the guise of Survivors Trust Cymru and from its Office at Bro Merthyr, The Redhouse, Old Town Hall, High Street, Merthyr Tydfil CF47 8AE (telephone number 07791 567085).

The five specialist voluntary sector organisations who offer and provide counselling and support services to Survivors of sexual violence and sexual abuse in Wales are all Members of the Survivors Trust.

Survivors Trust Cymru provides a Helpline for Survivors of sexual violence and sexual abuse.

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The Survivors Trust wish to submit the following observations in relation to the five questions tabled by the Equality, Local Government and Communities Committee in relation to their Post Legislative Inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (the Act)

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**Question 1: To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

1.1 As you might expect, we can only comment on improvements to the approach to tackling sexual violence and abuse. It is generally accepted that Survivors of sexual violence and abuse rely on the specialist voluntary sector for counselling, help and support. The five specialist sexual violence and abuse voluntary sector organisations working in Wales are all Members of The Survivors Trust. Also, we, operating under the guise of Survivors Trust Cymru, provide a Helpline specifically for Survivors of sexual violence and sexual abuse.

1.2 We have not noticed any discernible improvement in the approach to tackling sexual violence or sexual abuse as a result of the obligations contained in the Act or the implementation of the Act to date. So far as we are aware, no Local Authority, Health Board or Public Service Board in Wales has introduced a strategy specifically for sexual violence and sexual abuse or have plans to do so.

1.3 Some Local Authorities have produced a general VAWG Strategy but such strategies show a bias toward domestic violence and abuse - which is perhaps understandable but is still regrettable – and seem to fail to understand the help needed by Survivors of sexual violence or sexual abuse and the challenges faced by the specialist voluntary sector that supports them. Therefore, in our view, it is unlikely that existing Strategies will benefit Survivors of sexual violence and sexual abuse or the specialist voluntary sector organisations working in Wales to any great extent.

1.4 In our view the acceptance of at least some of the following suggestions would help:

- 1.4.1 A duty should be placed on each Health Board to have a strategy in place which has as its aim: (1) ensuring that it is aware of the prevalence of sexual abuse and sexual violence in its area and the full extent of the services available to Survivors; (2) ensuring that it is aware of the needs of Survivors; (3) ensuring that appropriate services are available to Survivors when they need them and close to where they live; (4) ensuring that there is a proper and full engagement between the Health Board, The Survivors Trust and Survivors Trust Wales Members so that the Health Board is fully aware of the challenges and pressures faced by service providers from time to time and is able to support service providers to the fullest extent possible.
- 1.4.2 Each Local Authority Domestic Violence Forum in Wales (or their successors in function or alternative Forums in each Local Authority area) should accept responsibility for considering and dealing with matters relating to domestic and non-domestic sexual violence and sexual abuse and underline this commitment in the title/name and terms of reference of the Forum. Also, each local Domestic and/or Sexual Violence Forum should have a strategy which has as its aim: (i) ensuring that it is aware of the needs of Survivors and the services available to them; (ii) reducing the prevalence of sexual violence and sexual abuse; and (iii) ensuring that adequate counselling and general support services are available to Survivors when they need them and within a reasonable distance of where they live.

1.4.3 The majority of counsellors who provide specialist counselling to Survivors of sexual violence and sexual abuse are volunteers. Wales Government should provide annual funding to each of the Survivors Trust Wales Members to enable them to employ a Trainer/Volunteer Co-ordinator whose role would be to recruit, train, organise and supervise Volunteer Counsellors.

1.4.4 An increase in the number of Volunteer Counsellors would result in more volunteers being recruited, more Survivors receiving counselling and support and Survivors receiving the help that they need when they need it and close to where they live. The likely attendant cost saving to the public purse through Survivors hopefully being returned to good health would be considerable and far more than the cost of employing Trainers/Volunteer Co-ordinators

1.5 We also feel that our specialist voluntary sector could, when compared to the domestic violence sector in particular, be better treated in terms of funding and support provided by Wales Government and other public authorities.

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**Question 2: What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?**

2.1 As already stated, we can only comment in relation to Survivors of sexual violence or sexual abuse. Engaging with Survivors of sexual violence and sexual abuse is not an easy task as many Survivors choose not to reveal the violence or abuse they have suffered or, if they have opted to seek counselling, help or support, they choose to then try and put their past behind them.

2.2 The majority of Survivors who are victims of sexual violence or abuse and who decide to seek counselling, help and support will approach one of the five voluntary sector specialist service providers working in Wales. Therefore, the best method of capturing the views and experiences of Survivors of sexual violence or abuse might be to engage with the Survivors Trust and its Members working in Wales to ascertain and agree the information that could most usefully be obtained from Survivors to help inform the implementation of the provisions of the Act.

2.3 Another avenue that might possibly be worth pursuing is for the Wales Government to engage with the Cardiff Office of IICSA to ascertain whether IICSA would be prepared to make available an agreed questionnaire to Survivors at the end of a Truth Project Session, which questionnaire could be returned to Wales Government or its nominee agent.



2.4 A third method of obtaining information would be to establish three Regional Survivors Forums in Wales for Survivors of sexual violence and sexual abuse which Regional Forums would feed into to a Wales National Survivors Forum. The Survivors Trust has just established, with backing and financial support from NHS England and MOPAC, a London Survivors Forum and we would be happy to use the knowledge and experience gained from the London Survivors Forum to work with Wales Government, the National Adviser and our Members/the specialist sexual violence and abuse voluntary sector in Wales to establish Regional Survivors Forums and a National Survivors Forum.

2.5 Suffice to say that, in relation to sexual violence and sexual abuse, we do not believe that effective methods currently exist to capture the views and experiences of Survivors to help inform the implementation of the provisions of the Act.

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**Question 3: Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

3.1 In real terms, we feel that, in the context of sexual violence and sexual abuse, little has changed in relation to the responses provided by and available from public authorities as a result of the Act. In this context, we would be very interested to learn of the improvements and initiatives introduced by various public authorities for Survivors of sexual violence and sexual abuse in response to the Act.

3.2 We feel that it would help if Health Boards and/or Local Authorities were placed under a duty to ensure that counselling and support is available to Survivors of sexual violence and sexual abuse when they need to receive it and reasonably close to where they live. As these services are (funding permitting) already provided successfully and at the lowest possible cost by Survivors Trust Wales Members, a better and more comprehensive service could simply and quickly be provided by the provision of funding to Survivors Trust Wales Members supported by appropriate Service Level Agreements. For this purpose, an overarching all Wales Sexual Violence and Abuse Strategy Board could be created, membership of which would consist of the National Adviser, Wales Government, Health Boards, Local Authorities and The Survivors Trust and its Wales Members.

3.3 It would also help if the Wales Government, with the co-operation of Local Health Boards and Local Authorities in Wales, undertook to provide more information to Survivors of sexual violence and sexual abuse about the help and support that is available to them in and across Wales.

3.4 We also feel that Local Health Boards, Local Authorities and other statutory organisations should be placed under a duty to locate and make available to the specialist voluntary sector in Wales unused or available office accommodation from which counselling and support services could be provided to Survivors of sexual violence and sexual abuse.

**Question 4: Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

4.1 We are very impressed with the National Adviser, how approachable she is and her genuine desire to make a difference. An excellent appointment.

4.2 It is too soon for us to be able to judge or to offer an opinion as to whether the National Adviser has sufficient power and independence from Wales Government to ensure implementation of the Act. Time will tell.

4.3 In our view, it would be a great shame if, having made such an excellent choice in the appointment of a National Adviser, her attempts to properly implement the Act were to any degree hindered by the Welsh Government or indeed Public Authorities in Wales or if she did not receive from everyone their full support.

4.4 In terms of views and concerns that we have heard expressed in relation to the development and consequences of the work to be undertaken by the National Adviser, the following comments should be mentioned:

- 4.4.1 Whilst the Act and the role of the National Adviser are welcomed and supported, there remains uncertainty on the part of individuals and organisations as to how this will translate into practice on both a regional and local level. This includes concern about the move to regional funding and the impact this will have on organisations and service delivery.
- 4.4.2 There is a concern that there is a lack of clarity and guidance around the structure of boards, operational groups and steering groups formed to help implement and deliver the National Strategy and the Act. Areas are keen to develop local plans and strategies but appear to lack the knowledge to determine how their work will be incorporated into and fit in with the wider policy and legislative context.
- 4.4.3 Concerns as to how newly established boards, hubs, operational groups and steering groups will fit in with, compliment and work with existing boards and groups such as Local Safeguarding Boards.
- 4.4.4 Concerns as to whether the National Adviser will be able to sustain and provide the level of support and guidance that will be needed across Wales when implementing the National Strategy and the Act.

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**Question 5: To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

We are unable to comment at this stage.

PLVAW 11

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015  
Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015  
Ymateb gan: Bwrdd Iechyd Prifysgol Aneurin Bevan  
Response from: Aneurin Bevan University Health Board

Aneurin Bevan University Health Board has welcomed this new legislation and the framework that it provides to ensure that agencies including the NHS fully meets responsibilities for this aspect of safeguarding and public protection.

In Gwent, the regional Violence Against Women, Domestic Abuse and Sexual Violence Board is well established and provides the forum for partnership working and planning to improve arrangements within and across public, private and voluntary sectors for the prevention, protection and support for all forms of violence against women, domestic abuse and sexual violence. We are fortunate that the Independent National Advisor is Chair of this Board as this provides us with strong and informed leadership.

The requirements of the Act for the health boards have been incorporated into *Keeping People Safe*, Aneurin Bevan University Health Boards Strategic Framework for Safeguarding. This 3 year strategic plan identifies key priorities and includes a training framework to support healthcare staff in acquiring the skills and knowledge that they require

PLVAW 12

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Cymdeithas Arweinwyr Ysgolion a Cholegau (Cymru) (ASCL)

Response from: Association of School and College Leaders (Cymru) (ASCL)

- 1 The Association of School and College Leaders (ASCL) represents over 17,000 heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of maintained and independent schools and colleges throughout the UK. ASCL Cymru represents school leaders in more than 90 per cent of the secondary schools in Wales.
- 2 The Association has limited access to evidence on some of the matters this inquiry is requesting, and will focus its submission on the basis of the elements that refer specifically to education.
- 3 We have been impressed with the Good Practice Guide: A Whole Education Approach to Violence against Women, Domestic Abuse & Sexual Violence in Wales. It is clearly laid out and contains good, relevant information and examples of good practice.
- 4 The Good Practice Guide has been welcomed in schools, and used as a basis for developing existing practice to reflect the needs and extending the understanding of young people.
- 5 In many schools it has resulted in a significant change of attitude amongst young people; however in other schools, the development of a whole-school approach to challenging violence against women, domestic abuse and sexual violence has been slower. We feel there is a need for these matters to be raised on a regular basis to keep them at the forefront of schools' priorities, and would welcome updates to be sent to schools, either in the form of a revised document, or new information/examples of best practice highlighted through the Dysg Newsletter.

Tim Pratt  
Director - ASCL Cymru  
15<sup>th</sup> September 2016

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Ffederasiwn Cenedlaethol Sefydliad y Merched–Cymru  
Response from: National Federation of Women's Institutes–Wales

## **1.0 Background**

1.1 The WI is the largest women's organisation in the UK with some 220,000 members in over 6,300 WIs across England, Wales and the Islands. In Wales, we have about 16,000 members belonging to 600 WIs.

1.2 The WI is an educational, social, non-party political organisation, established to ensure that women are able to take an effective part in their community, make new friends, widen their horizons, and together influence local, national, and international affairs on issues that matter to them.

1.3 Violence Against Women (VAW) is a systematic abuse of women's essential human rights and a form of discrimination against women. It is both a cause and a consequence of inequality. The NFWI has been campaigning for the elimination of VAW since 2008; raising awareness of the nature, extent and impact of all forms of VAW. NFWI-Wales is a member of the Wales Violence Against Women Action Group.

## **2.0 Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015**

### **2.1 Impact of the Act**

2.1.1 NFWI-Wales welcomes the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. We believe that this ground breaking legislation has the potential to make a difference to the lives of the women in Wales. For this to be achieved, the delivery of the Act must be supported by strong guidance and a strong National Strategy.

2.1.2 At this stage, it is difficult to evaluate the impact the Act is having in terms of improving the responses of public services in addressing VAW, domestic abuse and sexual violence. Through the Act and the work of the National Adviser, public services are aware of their obligations but the impact of the Act in changing the way that public services work may take time. Integration with the Well-being of Future Generations (Wales) Act also needs to be addressed by public services in developing their approaches to tackling VAW.

2.1.3 Issues around the commissioning of VAW support services continue to be a concern in the third sector. Statutory commissioning guidance is expected to come into force next year. The guidance must ensure that services are provided based on the needs of survivors and are gender responsive. Those who experience VAW, domestic abuse and sexual violence should be able to access the services they need wherever they live however at present this is not the case. The importance of the provision of women-only specialist VAW support services must be recognised as highlighted by respondents to the WI research undertaken in 2009 comparing and contrasting VAW in urban and rural areas. Respondents highlighted services which were women-only and specialist when asked to think who they trusted in tackling VAW in their communities.

2.1.4 Realistic, ring-fenced, long-term core funding is vital for service providers. Uncertainty in terms of funding can impact on services and resources through the need to continuously focus on securing funding and can take away their focus on service delivery. NFWI-Wales

hopes that the proposals by the Welsh Government to develop a sustainable funding model would address the issues faced by support services in securing long-term funding.

## **2.2 Engagement with survivors**

2.2.1 NFWI-Wales believes that it is crucial that the views and experiences of survivors help inform the implementation of the Act's provisions and ensure that it meets the needs of those affected by VAW. NFWI-Wales is pleased to note that the draft National Strategy on Violence Against Women, Domestic Abuse and Sexual Violence includes a commitment to develop a sustainable survivor engagement framework.

2.2.2 NFWI-Wales believes that VAW support services have a key role to play as a means of engaging survivors in sharing their experiences and views about what the Act needs to deliver in order to make a difference. The report "*Are you listening and am I being heard?*" was produced by Welsh Women's Aid in March 2016 on behalf of the Welsh Government. Based on focus groups held with survivors, the report presents survivors' experiences of the services they have accessed and their feedback on any improvements and issues which they feel need to be addressed to improve current service delivery and address VAW, domestic abuse and sexual violence. NFWI-Wales would like to see similar focus groups being undertaken on a regular basis.

2.2.3 NFWI-Wales suggests that means of engaging with those who experience VAW, domestic abuse and sexual violence but have not accessed services should be explored.

## **2.3 National Adviser**

2.3.1 The functions of the National Adviser are wide-ranging and we do have concern over the expectations required of the National Adviser in a part-time role and without a team of support staff. Ideally the role should have been set up under a similar structure to the current Commissioners.

## **2.4 Good practice guide to healthy relationships**

2.4.1 The guide is to be welcomed as a step in the right direction. It would be interesting to identify how many schools have used the guide and to gather case studies of whole school approaches to addressing VAW, domestic abuse and sexual violence. NFWI-Wales is concerned that, until further guidance is provided by the Welsh Government to local authorities, the guide could have limited impact in making a difference. We note that the *Violence Against Women, Domestic Abuse And Sexual Violence – Guidance For Governors* was published in March. Again, it would be interesting to gather feedback from schools and governors on any action undertaken in response to this guidance.

2.4.2 NFWI-Wales would like to see education on VAWG and healthy relationships included as a mandatory element of the new curriculum being developed.

## **3.0 Closing comments**

3.1 Following the development and publication of guidance to support the implementation of various aspects of the Act and the publication of the National Strategy, NFWI-Wales would expect to see evidence of the difference that the legislation is making at a regional and local level. We believe that members of the Equality, Local Government and Communities Committee have an instrumental role in ensuring that the Act is supported by strong guidance and in scrutinising the delivery of the Act.

## **4.0 Further information**

4.1 For further information relating to the above response, please contact the NFWI-Wales Office. Tel: 029 2022 1712 E-mail: [walesoffice@nfwl-wales.org.uk](mailto:walesoffice@nfwl-wales.org.uk)

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015  
Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015  
Ymateb gan: Dinas Cyngor Caerdydd  
Response from: City of Cardiff Council

- **To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

**1.1** It is our opinion that it is too early to say as local authorities have been awaiting the national strategy to be able to inform the local strategy. Given that we have only recently received the national strategy document and are now engaged in a consultation process, it will be some time before the main objectives of the legislation become actions within local strategies and delivery plans.

**1.2** The act has been useful in raising awareness of VAWDASV however, it is our opinion that the Social Services and Wellbeing Act 2015 has been more widely publicised and this has been the main focus for partners. A document from Welsh Government that aligns both pieces of legislation alongside the Future Generations Act would be very useful.

**1.3** In relation to the NTF, while the supplementary guidance has been useful, the rollout has been problematic due to IT issues and licences. Some issues surrounding the practicalities of training all staff as required by the legislation have yet to be resolved and the deadlines initially set by Welsh Government for completion of Group 1 were unachievable. Similarly the learning from Group 2 (pilot sites) is unlikely to be available until January 2017. This means the training delivery plan date of May 2017 may be unachievable also. During a meeting between City of Cardiff Council and the Welsh Government VAWDA team it was mentioned that these dates would be moved back. We are awaiting formal notification of this.

**1.4** VAWDASV team at Welsh Government has undergone a number of significant staff changes since the legislation achieved Royal Assent and this has affected the momentum of the delivery. Key messages and policy changes have stalled affecting the ability of local authorities to plan and take matters forward.



1.5 In Cardiff, the role of the Domestic Abuse Co-ordinator has been instrumental in raising awareness of the Act and the implications for statutory services. The future funding of this post remains unclear. In our opinion, more staff and resources are required to support the implementation of the act, not less.

1.6 A number of third sector agencies are fully committed to the Violence Against Women Agenda. In our opinion some elements introduced by the Act such as the e-learning should be made available to all third sector organisations.

1.7 In Cardiff, the White Ribbon Campaign has been an excellent way to raise awareness of the Act with both professionals and members of the public. A White Ribbon Cymru, supported by Welsh Government, would certainly be useful in helping to push forward the Violence Against Women Agenda which would include raising awareness of the Act and the supporting guidance.

- **What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences and to what extent is this information being used to help inform the implementation of the Act's provisions?**

2.1 In Cardiff, all of the specialist service providers engage with service users via groups, feedback forms etc however there is little consistency, information collated is organisation specific and it is not often shared more widely.

2.2 Cardiff Council welcome the opportunity to work with Welsh Women's Aid who are piloting the SEEDS model in Cardiff. The Domestic Abuse Coordinator has met with the co-ordinator of the project and are considering ways in which survivors can contribute to the re-commissioning process of domestic violence services in Cardiff.

2.3 Many survivors are unaware that the Act exists. In Cardiff, we use the White Ribbon Campaign to raise awareness of the Act with the general public. White Ribbon events will also provide an opportunity to raise awareness of the SEEDS pilot, the CHOICE research project (older people) and the Live Fear Free Helpline.

- **Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

**3.1** Given that the rollout of the NTF is still in its infancy and we are still awaiting statutory guidance in respect of Ask and Act along with the learning from pilot sites, again it is too early to assess the impact.

**3.2** In Cardiff, the Act has enabled us to review our existing Cardiff Domestic Abuse Partnership Executive group and we are currently reviewing the Terms of Reference to enable us to consider a broader strategic approach that considers the wider Violence Against Women agenda.

- **Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

**4.1** It is not possible to assess the power and influence that this post has until there is a situation where a challenge has been brought to light. However, it is noted that the National Adviser has been proactive in meeting with local authorities and other bodies to raise awareness of the VAWDASV legislation and has offered to support development of local strategies.

**4.2** The post is funded by Welsh Government and the post is part-time and there is no identified budget. All of these things may impact upon the effectiveness of this post.

**4.3** What sanctions have been set in place for LA's or responsible authorities for non-compliance?

- **To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

**5.1** This is again too early to assess. The take up of the Spectrum Project, funded by Welsh Government, has been slow. In Cardiff there has been low take up in the special schools in particular. In Cardiff the Domestic Abuse Co-ordinator, along with City of Cardiff Council Policy and Development Manager, briefed over 100 Head teachers and Deputy Head

Teachers about the Act, their obligations, and promoted the 'Whole School Approach' guide. Many of the teachers were unaware of role of education and what is required. More work is required to align the requirements of the Act to other pieces of legislation and guidance that affects education in Wales.

**5.2** The Welsh Women's Aid Children Matter project was highlighted as a free resource however there is a significant cost attached to the initial purchase of the STAR manual and training. Given the STAR programme is a more in-depth programme than the Spectrum programme provides it would be a very useful resource. It would be helpful if the costs attached to the purchasing of this programme could be reviewed.

**5.3** The Estyn Thematic Review mentioned by Welsh Government to take place during 2016/17 has not as yet been undertaken? This review will be key to the success and focus of schools going forward.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Cyngor Sir y Fflint

Response from: Flintshire County Council

## Consultation responses - Flintshire

### Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015

1. *To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?*
  - As yet we are unsure as to whether there has been an improvement. We are awaiting the appointment of a Regional Advisor and development of a regional strategic board to oversee the implementation of the Act. There has been insufficient launching and promotion of the Act nationally. Regionally we have developed Information Flyers to raise awareness across partner organisations.
  - Other challenges are due to work arising from a simultaneous release of legislation across a number of work streams such as VAWDASV, Social Services and Wellbeing Act, the Future Generations Act, and the Renting Homes Act, – which all have the capacity to increase existing workloads. Further information/guidance is needed to highlight just how these different legislation are/can be aligned.
  - Local specialist services have reported encountering significant pressures with regard to providing services and are likely to continue to do so in the foreseeable future. The implementation of the Ask and Act policy is also likely to increase demand of local specialist services. Final guidance for the Ask and Act has not been made available for services to know what the full impact of its implementation will be and therefore forward plan.
2. *What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences? And to what extent is this information being used to help inform the implementation of the Act's provisions?*
  - o Talking to service users directly, finding out about what their experiences have been during their journey, and doing so at different (but appropriate) stages of the journey to ensure that their needs are continuously being met throughout.

- Service user surveys and focus groups have also been effective ways of capturing their views and experiences.

Despite a number of service user groups being established across the region, currently, there is little evidence of how their contributions are being utilised to develop / improve services.

3. *Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?*

There has been a steady improvement in the improvement of responses from public services to victims of domestic abuse and sexual violence. This is due to the role of Domestic Abuse Coordinators in developing a coordinated community response. There is no evidence locally as yet that improved responses are a result of the Act.

4. *Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?*

- Don't know.

5. *To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?*

- Too early to tell if the guidance is making an impact on schools.
- Roll out of guidance was weak and this needs to be revisited.
- It is vital that the Donaldson review of Education is maximised to ensure greater time in the curriculum is given for education on relationships to be delivered as currently time in secondary schools is limited.
- Recommendations within the guidance need to be aligned with the Personal Development section of the Healthy School programme as this would be a way of supporting implementation and monitoring progress.
- The guidance is specific to children and young people that are in schools/college education settings, however some children and YP affected by/at risk of DA may not be in schools/colleges. Further work and resources need to be made available to reach this vulnerable group of young people that are not in education settings.

Please send your views to: [SeneddCommunities@assembly.wales](mailto:SeneddCommunities@assembly.wales) by **Friday 16 September 2016**. It may not be possible to take into account responses received after this date.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Comisiynydd Pobl Hŷn Cymru

Response from: Older People's Commissioner

I am responding to the consultation into the progress made following the implementation of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

I welcome the Act as it provides a legal framework that will enable those who are affected to receive the most appropriate support to help them during extremely difficult situations.

In regards to the question as to whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, I consider that the establishment of a national mechanism would be of great benefit in determining their experiences.

The work of the Independent Domestic Violence Adviser (IDVA) is crucial in helping to engage and support those people who are affected by these forms of abuse. The IDVA's will also have a greater understanding of the effectiveness of public authorities

I am aware that SafeLives have their 'Insights' programme, which is able to identify where support has been effective in helping to make survivors safe. It also helps to identify operational issues where there is a need for improvement. However, this system only operates in a small number of areas in Wales.

Through my contact with older people who are experiencing Violence , Domestic Abuse and Sexual Violence, I am aware that many do not consider or identify that specialist services are set up to meet their needs and as a consequence they will continue to live in the recurring cycle of abuse.

I would therefore expect there to be a national campaign that recognises older people are being subjected to violence, domestic abuse and sexual violence and shows that there are support services that are able to help them.

There is an increasingly and worrying problem with older people being victims of Domestic Homicide Reviews. The latest Home Office data indicates there 28 older people victims (aged 60+) in England and Wales were killed by a family member. This represented 24% of all victims. However, the reporting of domestic abuse incidents involving older people represented below 4% of all reported incidences.

Whilst I recognise and welcome the considerable progress that has been made across Wales, I believe that there are still some areas that need to be addressed.

My report 'Crimes Against, and Abuse of, Older People in Wales - Access to Support and Justice: Working Together', published in January 2015, provided an insight as to how agencies can work better together to prevent older people falling through the 'gaps' that exist between services.

I would expect to see local strategies developed to be able to report on how they are going to address those gaps identified in my report. If this is not reflected in their local strategies, I would expect Ministers to use their powers to issue statutory guidance and the duty to follow such guidance.

I hope this information is of use, please do not hesitate to contact me if you require any further information.

Yours sincerely,

A handwritten signature in dark ink, reading "Sarah Rochira". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

**Sarah Rochira**  
**Older People's Commissioner for Wales**

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,

Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Cyngor Bwrdeistref Sirol Wrexham

Response from: Wrexham County Borough Council

1. To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?
  - The priorities of the Act align quite well with the local authorities strategic priorities in terms of improving the arrangements for the prevention, protection and support for individuals who have been affected by Violence Against Women Domestic Abuse & Sexual Violence (VAWDASV) (evidenced via the PSB - PDB3 plans). These priorities are also now integrated into the Wrexham Domestic Abuse and Sexual Violence Strategic Group Delivery Plan. The group is made up of key strategic representatives from statutory and specialist third sector service providers across Wrexham. Its work streams include planning and delivering educational, awareness raising campaigns, via training, White Ribbon Campaign and the Wrexham Integrated Care Pathway (which is being updated to include information about the Act, the National Training Framework and the Ask and Act policy, including working with perpetrators).
  - Whilst some departments have been very proactive and receptive to the Act and aware of the obligations that they will face as a result of the legislation, it is clear that there remains some work to do with achieving the same result across the whole local authority.
  - In the coming months, we plan to do more work to promote the Act. We have developed a 2 page flyer that will be circulated across the county borough to publicise and raise awareness. Information about the Act is also included in the updated Domestic Abuse and Sexual Violence training, which is still being delivered as we await access to the group 1 eLearning package.
  - We will continue promoting the Act and its obligations as we launch the Group 1 eLearning training package once it is fully accessible on the NHS Wales learning site.
  - Challenges: the lack of information/direction/clarity from the W.G. VAWDA team has meant delays in work progressing.
  - Other challenges are due to work arising from a simultaneous release of legislation across a number of work streams such as VAWDASV, Social Services and Wellbeing Act, the Future Generations Act, and the Renting Homes Act, – which all have the capacity to increase existing workloads. Further information/guidance is needed to highlight just how these different legislations are/can be aligned.
  - Local specialist services have reported encountering significant pressures with regard to carrying out the functions of the Act (i.e. more referrals/demand for the services) and are likely to continue to do so in the foreseeable future. The implementation of the Ask and Act policy is also likely to increase demand of local specialist services.



Final guidance for the Ask and Act has not been made available for services to know what the full impact of its implementation will be and therefore forward plan.

2. What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences? And to what extent is this information being used to help inform the implementation of the Act's provisions?
  - Effective methods:
    - o Talking to service users directly, finding out about what their experiences have been during their journey, and doing so at different (but appropriate) stages of the journey to ensure that their needs are continuously being met throughout.
    - o Service user surveys and focus groups have also been effective ways of capturing their views and experiences.
  - In Wrexham, arrangements are in place within the different specialist service providers to capture the views of the service users, these range from service user groups run at Welsh Women's Aid Wrexham (the SUs run these themselves); Bawso also run similar groups for BME clients; Stepping Stones are in the process of setting up a user group for their clients who are adult survivors of childhood sexual abuse; Hafan Cymru are also in the process of setting up a user group for male victims of domestic abuse in Wrexham. All of the service users involved in these groups will be given an opportunity to participate and provide feedback and recommendations as to the implementation of the Act.
  - A service user involvement framework is currently being developed and will assist service providers to engage more consistently and meaningfully with service users.
3. Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?
  - Survivors are beginning to experience better responses from public authorities as practitioners begin to learn about and understand the Act and have VAWDASV on their radars. Public services, particularly housing and homelessness teams have been very receptive and proactively seeking to implement the provisions of the Act within their policies and procedures. In the coming months, we plan to do more work to promote the Act within other departments. We have developed a 2 page flyer that will be circulated across the county borough to publicise and raise awareness. Information about the Act is also included in the updated Domestic Abuse and Sexual Violence training.
  - We will also continue promoting the Act and its obligations as we launch the Group 1 eLearning training package once it is fully accessible on the NHS Wales learning site as this will assist practitioners in providing better responses to survivors.
4. Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?

- Not sure.
5. To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?
- Too early to tell if the guidance is making an impact on schools, although a number of schools do already deliver on a number of the recommendations e.g. delivery of education Cat's Paw performance.
  - Roll out of guidance was weak and this needs to be revisited.
  - It is vital that the Donaldson review of Education is maximised to ensure greater time in the curriculum is given for education on relationships to be delivered as currently time in secondary schools is limited.
  - Recommendations within the guidance need to be aligned with the Personal Development section of the Healthy School programme as this would be a way of supporting implementation and monitoring progress.
  - The guidance is specific to children and young people that are in schools/college education settings, however some children and YP affected by/at risk of DA may not be in schools/colleges. Further work and resources need to be made available to reach this vulnerable group of young people that are not in education settings.

Please send your views to: [SeneddCommunities@assembly.wales](mailto:SeneddCommunities@assembly.wales) by **Friday 16 September 2016**. It may not be possible to take into account responses received after this date.

PLVAW 18

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,

Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,

Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Both Parents Matter

Response from: Both Parents Matter

This is a response from FNF Both Parents Matter Cymru – a Welsh charity primarily supporting the rights of children and young people under Articles 9 and 18 of the UNCRC. The charity provides the Secretariat for the Cross Party Assembly Group on Fathers and Fatherhood

- **To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

1. In writing this report we were able to re-visit the FNF BPM consultation response to the Committee in September 2014. Sadly it made for depressing reading as many of the issues that we see now were raised in that earlier document<sup>i</sup>
2. The legislation has had the effect of making services that already tended to approach allegations of abuse from a pre-determined and gendered perspective even more polarised in their work
3. The men who approach us for help and support report in more than 40% of cases that they have experienced a range of psychological, emotional, financial and also physical violence at the hands of their female partners. They also report a gendered response in their experience of engaging with public services. Examples include men who are told to ‘man up’ by officers from South Wales Police when they report that the tyres of their car have been slashed following a domestic argument over child contact – even though the children were in the car when they drove away.
4. We identified to the Assembly during the passage of the legislation that pre-determining the result of investigation by including the gender of victims within the title of the legislation would make it more difficult for the 30% + of victims of abuse who are male to receive the help and support they need. We cannot imagine any other Government initiative that would adopt a similar stance. For example whilst 75% + of those who commit suicide in Wales are men the Talk to Me 2 strategy does not have an equivalent gendered perspective.
5. It is significant to note that as far back as 2009 in the Ministerial response from the then Social Justice Minister to the Strategic Action Plan to Update the Domestic Abuse Strategy and to Tackle Violence Against Women one of the three key messages he identified was ***‘the need to provide more services for male victims of domestic abuse’***.<sup>ii</sup> The Minister at the time was Carl Sargeant AM. We

see that almost seven years later the Minister is once again in a position to deliver on this strategic vision.

- **What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?**

6. We have studied the document – ‘Are you listening and am I being heard?’<sup>iii</sup> commissioned by Welsh Government from Welsh Women’s Aid. It is a powerful document grounded in the experience of 65 women and 1 man who have faced domestic violence and abuse. These women deserve for their voices to be heard and measures put in place to provide them with help and support. We are particularly pleased to see that the project has successfully engaged with ethnic minority women – who represent more than 44% of the total in the survey.
7. What is glaring is its omission of the experience of men. Welsh Women’s Aid stated on p15 of the report that  
***‘Although we sought involvement from women and men to participate, in separate focus groups, 65 women survivors participated in focus groups/interviews and 1 man participated by interview. A number of male survivors were contacted about the consultation and encouraged to participate in focus groups or interviews by their male support workers, but declined to take part.’***
8. This statement clearly illustrates the failings of existing methods to capture the views and experiences of survivors. Services that are currently funded to support all victims of abuse are unable to reach the large number of male victims to such an extent that just one male survivor could be found.
9. The failure to engage with male victims is a further indication of the difficulties exacerbated by this gender biased legislation in Wales.
10. Male victims (29%) are over twice as likely as women (12%) to not tell anyone about the partner abuse they are suffering from. Only 10% of male victims will tell the police (26% women), only 23% will tell a person in an official position (43% women) and only 11% (23% women) will tell a health professional.<sup>iv</sup>
11. Women (31%) are significantly more likely to identify partner abuse they’ve suffered as Domestic Violence than men (19%).<sup>v</sup>
12. A gender specific approach needs to be introduced that allows existing services with a strong track record and ideological commitment to support for women to concentrate on the group of survivors that they are best equipped to support. This will allow new services that will support male victims to emerge.
13. The services that have developed have a strong feminist heritage and an experience of supporting female victims. Some might suggest these organisations have a strong anti-male bias seeking to downplay the experience of men and ensure that women are exclusively supported while men are monitored and disadvantaged when they seek help. We don’t believe that the conspiracy theory is proven, rather that organisations whose core purpose and values have developed to support women from the experience of women are simply not suited to provide support to men. We can find no better evidence or this than

Welsh Women's Aid's own analysis in their briefing paper on male victims of abuse <sup>vi</sup>

***The vast majority of domestic abuse services are catered towards women and have been developed with women's specific set of service needs in mind as a result of over thirty years of tailoring services to meet the needs of women and children***

14. The position of Welsh Women's Aid in relation to male victims was clearly stated in their document produced in 2010 for the Assembly <sup>vii</sup>

***'The assumption that services which have been created with women's needs in mind will be a perfect 'fit' for male victims, or that single-sex domestic abuse services can become mixed-sex, fail to take into account men's and women's specific, and often different, needs. As such, gender-neutral approaches are not helpful (and indeed can sometimes be dangerous) for either male or female victims.'***

15. We are delighted to report that following discussions with the National Adviser and a request for data on the number and percentage of male callers to the gender neutral 'Live Fear Free' Helpline we have accepted an invitation from Welsh Women's Aid to meet with them in October to explore how we may be able to assist in the understanding of the experience of male victims in a more accurate way.

- **Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

16. Our charity has compiled the Welsh Dads survey in 2015 <sup>viii</sup> and again in 2016. <sup>ix</sup> The most recent survey included responses from 209 men across Wales – with every local authority represented. Although domestic abuse was not a specific category about which men were invited to comment the 2016 survey included a new section on the experience of engaging with Police. Whilst we recognise that the Police are not a devolved matter their practices cast a long shadow over the response of other public authorities such as health and education that are wholly devolved.

17. The overwhelming experience of men has been that neither Police nor DV services treat them with fairness or equality. 59 respondents stated that their experience was Strongly or Mostly Negative while 23 expressed Strongly or Mostly Positive experience. The views of respondents included the following in the Welsh Dads survey 2016.

***Seems they only act for mums***

***Inherently sexist in their approach to DV.***

***Police seem to believe mothers story over father***

***Spoke to the police when my wife first left and was made to feel like a criminal.***

***I have been the victim of domestic abuse and harassment. They ignore any Male reports of incidents, and then threaten the man with warning notices. They do not care about men etc. They only care about statistics for female reports.***

***The police defend mums position by threatening me with arrest and taking our child into police protective custody at the whim of mum, despite no crime being committed and being informed that they have no powers to act in such a way over civil matters.***

***South Wales Police discriminate against non resident fathers***

***officers initial reaction to callout is to side with mum and try to convince child that mum is right and they should go back to her!***

18. The experience of men is that when they are victims they are often treated as perpetrators and rested by the Police. This experience has been shown in academic studies by Dr. Jessica McCarrick of Teesside University quoted in the the Telegraph who stated  
***“Men find it incredibly difficult to talk about their experiences of domestic violence because of the shame and emasculation they feel is associated with it. “To find the courage to speak out, only to be accused of violence themselves, is incredibly disheartening and ultimately prevents countless men from reporting intimate partner violence.”*** <sup>x</sup>
19. We are calling for an immediate end to the gender discrimination whereby male survivors seeking help and support are ‘screened’ by services funded by Welsh Government and others to determine whether they are ‘genuine’ victims of abuse. We believe that this practice – that only applies to male survivors - is clearly discriminatory. We have approached the EHRC in Wales for their support in looking at ways to bring about legal challenges to this practice.
20. Our charity also undertook research in the area of eligibility for Legal Aid as a result of domestic violence to inform the EHRC’s ‘Is Britain Fairer? 2015’ report. Once more the comments from the 226 responses received paint a clear picture that services discriminate in favour of women and against men. <sup>xi</sup>

***Seems that DV doesn't get recognised against a male. I was a victim and now barely see my child, have lost my house and everything.***

***I was threatened and assaulted by my wife, who due to her having an affair I was leaving .police were not really interested .if I had assaulted her I would have been charged .ie gender bias***

***Over a period of nine years I was beaten up by my wife, and then beaten up by the system which listened to her lies, and assumed I was guilty***

***Being a male victim of Domestic violence was not something anyone ever believes you actually happened.***

*I do not know of a single gender neutral DV helpline, do they even exist? the media is full of experts/journalists/women rights groups who regularly diminish DV against men in favour of women victims only. there is simply not enough or any awareness for men as to what they need in order to pursue legal action for DV. we are expected to provide everything without any support, whereas women victims get funded support groups to assist them.*

*The system is a joke. It's designed for women and only works for women. When my ex made false claims of harassment to the police I was cautioned and interviewed by two women officers who looked at me like I was guilty from the outset. A female would never be interrogated by two male officers like this.*

*There is no support for men, plenty for women though.*

*As a man, we are more vulnerable to constant abuse by the mothers of our children and almost no authority will do anything about it. We are clearly in a very weak position.*

*Police, housing, government organisations and social services did not and do not care.*

- **Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**
  21. We have been delighted to meet with the National Adviser on two occasions to discuss the experience of male victims of abuse and the systemic failings made significantly worse by the provisions of the legislation. She attended the August 2016 meeting of our Cardiff support group together with 37 of our volunteers and service users, where she was able to listen to the testimony of male survivors and their female family members and friends.
  22. We remain hopeful that the genuine concerns about the marginalisation of men and boys will be addressed, although it is currently too early to determine whether these encouraging words will translate in making real differences for men both as victims and as indirect victims through the use of false allegations.
  23. We hope that through engagement with the National Adviser she will be able to promote a more balanced approach to the issues recognising the importance of addressing issues such as false allegations, appropriate services for male victims that are not commissioned from or controlled by a feminist agenda.
  24. We note that the National Adviser has powers under Section 21 (1) c of the Act to undertake research relating to pursuing the purpose of this Act. We have discussed in some detail the ways in which men are discriminated against in the provision of support and the lack of research about their experience. We hope that the National Adviser will work with us to secure appropriate resources to close the evidence gaps and highlight the specific needs of men.

**To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

25. There is little that we can say on this aspect of the consultation as we have not been given the opportunity to contribute to the development of the guide nor to assist in implementation.
26. We are however gravely concerned that the content of the guide continues to promote a gendered perspective that supports a world view where male is bad and female is good.
27. Throughout the guide the consistent message that is promoted is that whilst men and boys could be victims the focus of attention will be on women and girls and through that 'gendered lens'.
28. Our charity would welcome the opportunity to contribute substantively to the production and development of Health Relationships guidance and work providing a perspective on the experience of boys in particular but also seeking to engage with girls and boys to raise issues about the presumption that women are the primary or sole carers for children.

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## Bawso response to Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence Act 2015

Established in 1995, Bawso is an all-Wales specialist support provider for Black and Minority Ethnic (BME) people affected by domestic abuse (DA) and violence against women (VAW). Bawso provides culturally sensitive support and advocacy to vulnerable people experiencing domestic abuse, forced marriage (FM), honor based violence (HBV), or who are victims of trafficking and female genital mutilation (FGM). The advocacy and support enables service users to transcend the barriers they face and gain access to the services, entitlements and information they need and to which they have a right.

Support is provided to more than 4,000 service users annually through 12 projects including: - purpose built refuges which are specially adapted to meet the cultural and religious needs of service users; outreach; information and advice; floating support and FGM health and safeguarding community based project. Bawso has 'Investors in People' award and the Quality Mark at General Advice Level by the Legal Services Commission. Both sustain and maintain the quality of services.

Bawso is committed to challenging all forms of violence against women, and works in partnership with national, regional and local governments, statutory bodies and voluntary organisations to devise and deliver appropriate strategies and support services. All services are planned, developed and delivered in partnership with beneficiaries and partner organisations.

### Response to Questions

- *To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?*

The approach to tackling violence against women, domestic abuse and sexual violence is gradually improving. There is evidence of local authorities and health

boards starting initiatives to fulfil their obligations under the Act to ensure that staff are adequately trained to effectively and consistently support victims and survivors of VAWDASV. For example ABMU health board is actively piloting the Ask and Act training and South Wales PCC has commissioned training for staff on specialist areas such as FGM and FM.

However, implementation of the Act is still in early stages so it is difficult to indicate the extent the approach to tackling VAWDASV is improving because only a few sections of the Act have been executed. Most of the work remains in developmental stages. However, it is worth noting that there is still a strong focus on domestic abuse and not violence against women and sexual violence in the guidance being developed. For example, although harmful practices such as FGM, FM and HBV are mentioned in the legislation, there isn't a strong enough commitment to change attitudes as well as support provision. Emerging strategy which is out for consultation there is neither central government nor local authority commitment to resource work in the areas.

Emerging guidance should commit some level of funding resource and indicate more specifically what strategy under the Act will intend to achieve. In addition, there is a lack of understanding at local authority and local health authority of what their responsibilities are under the Act.

- *What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?*

Listening to survivors of VAWDASV is of paramount importance. They have the lived experience which no support provider can bring to the table. The involvement should be led by survivors and community. Survivor involvement should be a continuous process that uses different methods to gather information including:

1. Focus group discussions – for those who feel confident enough to speak out about their experience.
2. Survivor panels – which are led by survivors. They are more effective because when the survivors lead, they are able to determine key issues affecting them unlike when support providers lead the discussions. The advantage is that they would have strength in numbers. The panellists could regularly inform development and delivery of policy and services.
3. One to one discussions or non- randomised surveys – particularly for those who are able to communicate fluently in English or Wales.
4. For BME survivors it would be worth considering non traditional ways of gathering information for policy development and service delivery. Approaches adopted should be empowering the whole community because some types of violence are promoted by the multiple perpetrators (i.e. FM FGM and HBV). In such instances engaging only with the individual increases risks. To this end the methods used should be none Eurocentric and could include: peer data gathering; activities, food sharing, and sport.

It is also imperative that feedback is given to survivors about how their input has been used. For example, most BME people feel over researched, and do not know how their information is used.

- *Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?*

There is a beginning of initiatives to dispel tensions between BME survivors and the public service. Through some of the work that has started BME survivors are gaining understanding of the role of public services, and how they can engage with them to make them aware of their issues. On the other hand, public service is beginning to move away from the myth that BME communities are “hard to reach”. The Act allows for resource input and further commitment.

The current practice under the Act is promising although it is still early days yet in the process. An example of this is the roll out of the national training framework. Group 1 training was implemented last year and it was supposed to reach almost all public sector employees. Group 6 training (short videos for organisational leaders) were rolled out concurrently with group 1 training to ensure that there was buy-in at the top. Group 2 training is also being piloted in a few areas at present.

The challenge however is that there has been no evaluation of what has been implemented to assess the impact. An evaluation would pull together information on the number of people who have accessed the material as well as the difference it is making in their work. There would also be a lot of lessons learned coming through the evaluation which would benefit widespread implementation.

- *Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?*

The post of National Advisor is a move in the right direction in principle. However it remains to be seen how independent and effective the role is. It is not clear how the role of National Advisor will be able to hold LA and other organisations to account if they fail to comply with the legislation.

The National Advisor role would be more effective if it was full time and there was a staff team working collaboratively to ensure that they gather data to inform the strategy on an ongoing basis other than relying on focus groups for example.

*To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?*

Welsh Women’s Aid consulted widely when developing the good practice guide to healthy relationships which sets out robust principles. However, there is no clear indication where and how the guide is being implemented. It would greatly benefit the different stakeholders if information was made available of where the good practice guide is being used so that lessons can be learned from early adopters or pilot areas.

The written statement entitled “Educational Provision and the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Bill states that Local Authorities would have to comply with such statutory guidance unless they could demonstrate, to the satisfaction of Welsh Ministers, that they had found a satisfactory alternative approach. However, it at present, it is not clear how local authorities will be engaged with to ensure that they are implementing the whole school approach. It is also not clear if any local authorities have been asked to demonstrate how they are implementing section 14 of the VAWDASV (Wales) Act. Therefore it is challenging the express a view on the extent the good practice guide is influencing the development of a whole school approach.

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Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,

Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,

Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Port Talbot & Afan Women's Aid

Response from: Port Talbot & Afan Women's Aid



## **Equality, Local Government and Communities Committee**

### **Post Legislative Enquiry**

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The Committee will be looking at progress made in the implementation of the Act's provisions and its impact to date. In particular, the Committee will be considering:

#### **To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

Since the implementation of the Act we have seen significant improvements to the leadership arrangements for VAW, DA and SV in Neath Port Talbot County Borough Council. However it remains unclear at this stage if all parts of the local authority are committed to the tackling VAW, DA and SV in a way that is set out within the legislation e.g. Supporting People and Children Services.

There are grave concerns that the Supporting People team will soon announce their intention to commission generic floating support services and it is unclear at this stage whether domestic abuse services will be included or not.

Likewise in NPT, funding for specialist children and young people's services have been lost, aside from a small resource within the TAF team. There have been occasions at MARAC where the partnership has been unable to refer children who are in need of services.

It is essential that the Government focuses its intention on the pending commissioning guidance, as commissioning decisions are being made locally which affect VAW, DA and SV services. The guidance should explicitly discourage commissioning of generic services and furthermore promote the need for specialist children's services.

We are also fortunate in this area to be part of the ABMU Ask and Act pilot. The ABMU Steering Group meets on a regular basis and appears to be achieving its aims. While there was a short delay in rolling out training to staff, it is not seen to be a problem in the long term.

As a pilot, it is important to utilise this time to trial and test the model appropriately in order to provide best practice models to the rest of the country.

Consideration must be given to ensuring that specialist services are fully funded and able to support those impacted by VAW, DA and SV without lengthy delays. There is a very real risk that Ask and Act will create a bottleneck of vulnerable families who have been identified as at risk or need but are unable to access the support they need. Sustainable funding/resource for specialist services must be agreed before the roll out of Ask and Act.

**What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?**

No changes have been made to the reporting requirements of our services. National indicators should be set and reported on to evidence any outcomes or impact from the legislation. There should also be arrangements in place to regularly feedback service user voices and opinions.

Consideration should be given to externally evaluating service user responses in the Ask and Act pilot areas.

**Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

As above – consideration should be given to fully evaluating service user responses in Ask and Act pilot areas, once it has been fully implemented. We are already starting to capture information of whether referrers have received Ask and Act training but wider consultation is needed to identify if there has been real change.

**Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

I would hope that this is the case but it is unclear at this stage. The National Advisor should have powers to audit and seek clarification on commissioning of VAW, DA and SV services.

Furthermore, training as set out within the National Training Framework should be made mandatory.

**To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence**

To our knowledge there have been no developments on this to date within NPT, although it has been recognised.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,

Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Atal y Fro

Response from: Atal y Fro

### **About Atal y Fro**

Atal y Fro provides support to families in the Vale of Glamorgan who have experienced, or are experiencing, domestic violence:

*We do this by:*

- Sustaining and developing work relations with partners & stakeholders;
- Raising awareness, informing, and educating communities in the Vale about domestic abuse and its causes, consequences, and prevention;
- Continuing to provide and develop specialist services available to all stakeholders;
- Consistently monitoring and evaluating our services;
- Raising the profile of Atal y Fro

### **Inquiry**

- *To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?*

Atal y Fro welcomes the Welsh Government's commitment to eliminating Violence Against Women, Domestic Abuse, and Sexual Violence (VAWDASV) through the introduction of the recent Act (*Welsh Government, 2015*). We have seen small changes in terms of increased awareness of the nature of VAWDASV, better responses from the police and schools, and pockets of good practice. However, we feel that it is too early to evaluate its true impact on the lived experiences of victims and survivors.

We would like to highlight the importance of ensuring that national and local VAWDASV strategies have attached ring-fenced budgets for the provision of specialist services. We welcome the *Collaborative Commissioning Toolkit for Services in Wales* and in particular its recommendation for creating ways 'to level the playing field' to ensure smaller providers are able to compete effectively with larger players. This would ensure that local and specialist provision for victims is protected.



Since the introduction of the Social Services and Wellbeing Act (Wales) 2014, we have seen a slow but steady increase in the number of informal referrals directed to our service without any local budgets allocated to ensure adequate provision. We are concerned that on-going fiscal tightening will strain already stretched third sector providers that are delivering crucial services to keep victims safe, and we would welcome an impact assessment of other legislation on VAWDASV provision.

- *What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?*

Atal y Fro supports the co-production of services with victims and survivors of abuse by continuously listening to their views and seeking feedback from them. We are interested in the development of a national framework for on-going survivor engagement and involvement. As an organisation that provides frontline services, we believe that any process to capture survivors' views should be undertaken in a sensitive manner that puts their needs at the centre of every interaction and minimises the risk of re-victimisation. Our experience is that whilst some survivors may wish to be involved in formal consultation processes and have their views heard, many wish to move on and focus on rebuilding their lives away from abuse. Informal arrangements to capture their experiences can be embedded in the day-to-day contact of front line staff with victims and survivors. As well as developing a framework for consultation, it is just as important to develop a mechanism for feedback and accountability to ensure that meaningful change occurs as a result of consultations.

Our recommendations would also be for policy makers to regularly reach out directly to the public and survivors in order to hear their views and capture their experiences. Overreliance on specialist services to consult with their service users misses out the experiences of those who may not identify as victims/survivors or those who have not sought any formal support. Whilst the provision of services is paramount, a more holistic approach would allow for the development of approaches and interventions that build on the strengths and resilience of individuals and communities in line with the well-being goals of the Well-Being of Future Generations Act 2015.

- *Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?*

We recognise the gendered nature of domestic abuse and the disproportionate impact it has on women and girls. Improved responses and service provision is required particularly for those women that experience multiple disadvantage (e.g. LGBTQ women, older women, BME women etc.) However, we are also concerned about the lack of male voices in the development and implementation of VAWDASV

policy and legislation. For example, only one male victim agreed to take part in the recent *'Are you listening and am I being heard?'* report. Tailored approaches need to be developed to encourage male victims and survivors to come forward.

Traditional gender roles and expectations of masculinity are particularly harmful to male victims of domestic abuse and sexual violence as they act as barriers for them to disclose abuse and seek support. This hinders any efforts by policy makers and commissioners to identify the true extent of the issue in order to map out and fund specialist provision. The subsequent lack of services for male victims further deters them from self-identification. For those who do seek support there aren't adequate specialist local services that understand their needs and can appropriately support them. We support the *Collaborative Commissioning Toolkit's* statement:

*'Those affected by violence and abuse – either currently, or in the past – may have no contact at all with public services. Any commissioning must therefore recognise that provision must anticipate and address the needs of those who are not actually demanding services.'*

We are also worried about the lack of preventative interventions. One of the ten recommendations from survivors is a *greater focus on perpetrators' behaviour and holding them to account*. Seven years ago, our organisation changed its name to Atal y Fro as it was becoming increasingly clear that if we are to break the cycle of domestic violence we need to concentrate our energies on prevention. This means tackling it within the whole family (including dads/partners) and educating children and young people. As a result, we developed a program for male perpetrators of domestic violence, called C.H.A.T. (Choosing Healthy Alternative Techniques). With funding by the Welsh Government's Sustainable Social Services Third Sector Grant, we are rolling out the programme across different areas of Wales.

The aim of the programme is to:-

- Enable participants to identify and acknowledge their current / past abusive behaviour and use skills and strategies taught on the programme to make positive changes in their behaviour. This is done through conversation / individual and group exercises and the practice of the skills and strategies taught on the program.
- Enable participants to take responsibility for their use of abusive behaviour in their intimate relationships.
- Enable participants to identify the beliefs and intents which underpin their abusive behaviour.
- Enable participants to acknowledge the effects of their behaviour on themselves, their partners, children, and others.

Currently, interventions for perpetrators of domestic abuse are primarily rooted in the Criminal Justice System. We welcome the Welsh Government's commitment to address the root causes of domestic abuse by commissioning our work with

perpetrators through the Sustainable Social Services and Wellbeing Third Sector Grant. However, we would also like to see the Welsh Government taking a leadership role in mapping the range and nature of interventions for perpetrators and developing a national framework with particular focus on programmes that work with non-court mandated perpetrators in the community. There are discrepancies in service provision across Wales, a real dearth of accredited programmes, and no formal mechanism or network for sharing information and good practice. Atal y Fro is in the process of applying for Respect accreditation and is consulting with partner organisations to ensure that programmes operate in those areas of highest need and local resources are maximised.

- *To what extent does the good practice guide to healthy relationships guide successfully influence the development of a whole-school approach to challenging violence against women, domestic abuse, and sexual violence?*

We are concerned that the development of good practice in schools continues to be driven by the commitment and passion of individual professionals in the sector. In addition, good practice remains open to interpretation which leads to variations in local approaches.

Feedback that we have received from teaching staff suggests that there is a significant lack of specialist knowledge and confidence to address this issue directly with children and young people. We would therefore recommend that the delivery of preventative work in schools is undertaken by specialist local agencies that are able to raise awareness on VAWDASV, and who have the local knowledge to provide follow up support to young people that disclose personal experiences of abuse.

Support for children and young people often takes the form of crisis intervention usually as a result of safeguarding concerns. This approach ignores the long-term impact that witnessing and experiencing domestic abuse has on children. Many survivors talk about early experiences of abuse and their re-victimisation as adults. The Welsh Government should prioritise the needs of children and young people with a particular focus on therapeutic interventions tailored to their needs.

Finally, we would like to see the National Training Framework to be widened to include higher education institutions. Atal y Fro's *Talk* programme, which is commissioned by the South Wales Police and Crime Commissioner's office, works with four universities in Wales. The programme has highlighted the need for university staff to have access to the e-learning pack developed for Health and Education professionals and to be included in any staff learning and development initiatives.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,

Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Abertawe Bro Morgannwg

Response from: Abertawe Bro Morgannwg



### **1.0 To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

ABM University Health Board (ABMUHB) is an early adopter site (pilot) within Wales for implementation of “Ask and Act”. The obligation set out in the Act makes a positive contribution to tackling violence against women, domestic abuse and sexual violence (VAWDASV). A pre-training and post training evaluation of staff who have received Group 2 training has been completed and is on-going. The evaluation shows that health professional’s level of knowledge and confidence relating to VAWDASV has improved as a result of the training. There have been marked improvements made in health professionals identifying and referring victims of domestic abuse. Greater emphasis must be made in tackling sexual violence and the wider violence against women and girls agenda as set out in the Act. Due to the limited time frame of the pilot, extra time is required to evaluate the impact of the Act.

### **2.0 What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences and to what extent is this information being used to help inform the implementation of the Act’s provisions?**

Capturing views and experiences of survivors must be managed in a sensitive way given the individuals experiences and need for anonymity. Often within health care, contact with a patient may be a “one off” and therefore it can be difficult to capture views and experiences. ABMUHB as a result of the Act has agreed pathways for referral to local specialist services and therefore meaningful views and experiences may be best captured upon case closure and feedback through partner agencies and specialist services. ABMUHB is looking at ways to capture patient stories as a supportive and therapeutic mechanism for those wishing to share their experiences and raise awareness as recommended by 1000 Lives Plus. The Safeguarding Team will be trained to capture these stories and survivors will be offered several options in sharing these, e.g. voice recording or writing their story. Past experience with survivors tells us that feedback should be offered in various ways to meet the individual needs and often this is completed with a health professional.

### **3.0 Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

Within the pilot, “Ask and Act” referral pathways have been developed through collaborative work with Local Authorities, the Third Sector specialist support services and the Live Fear Free Helpline. Health professionals report feeling more confident in referring and have greater awareness of specialist support services available to victims and survivors. Again, it is early within the pilot to evaluate the impact of “Ask and Act”

### **4.0 Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

The Welsh Government’s commitment to tackling VAWDASV is clear and the appointment of the National Adviser to drive improvements in the way services for victims and survivors are commissioned and delivered is a positive step towards tackling VAWDASV.

### **5.0 To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

ABMUHB support the good practice guide to healthy relationships. The nine key elements of a whole education approach show the positive intention to challenging VAWDASV. From a health perspective it is too early to comment further as it is too early to fully understand and measure the impact.

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Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Cartrefi Cymunedol Cymru

Response from: Community Housing Cymru



## *CHC's Response*

### **About Us**

**Community Housing Cymru (CHC)** is the representative body for housing associations and community mutuals in Wales, which are all not-for profit organisations. Our members provide over 158,000 homes and related housing services across Wales. In 2014/15, our members directly employed 8,800 people and spent over £2bn (directly and indirectly) in the economy, with 79% of this spend retained in Wales. Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

### **Our objectives are to:**

- Be the leading voice of the social housing sector.
- Promote the social housing sector in Wales.
- Promote the relief of financial hardship through the sector's provision of low cost social housing.
- Provide services, education, training, information, advice and support to members.
- Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

### **Our vision is to be:**

- A dynamic, action-based advocate for the not-for-profit housing sector.
- A 'member centred' support provider, adding value to our members' activities by delivering the services and advice that they need in order to provide social housing, regeneration and care services.
- A knowledge-based social enterprise.





**National Assembly for Wales Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015**

**Terms of reference**

The Committee will be looking at progress made in the implementation of the Act's provisions and its impact to date. In particular, the Committee will be considering:

- **To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

We think that it would be too early for us to comment on whether there has been an improvement in tackling violence against women, domestic abuse and sexual violence as a result of obligations of the Act. We believe that our members are aware of the Act and its provisions, as CHC has highlighted the Act to members and responded to consultations on the Act including, multi-agency framework requirements, Ask and Act and the provisions of the national training framework within the Act. Responses to these consultations have shown that our members are working towards strategies to improve their responses to tackling violence against women, domestic abuse and sexual violence.

One of our main asks on behalf of our members was for the Ask and Act training to be rolled out more widely among partners as RSLs already deal with and manage issues of domestic violence in their properties. Being involved in any training would help increase their ability to act on suspected issues of domestic violence, limiting the possibility of instances escalating and being identified only when they reach escalating points by other agencies.

Housing organisations are listed in the Act as needing to be involved or helping with Ask & Act. It would be helpful if professionals working in the housing field including those working for Registered Social Landlords can receive/benefit from Ask & Act training. At the moment it's being piloted by the 'relevant authorities' and it appears that Registered Social landlords are not going to be able to access it until sometime in 2017.

In terms of multi-agency working we know that our members continue to work in partnership with other organisations to tackle violence against women, domestic abuse and sexual violence but that this is not without its challenges, especially where there are no formal arrangements in place.



We are aware of a project across Gwent where a number of social landlords have come together to tackle the issues of violence against women, domestic abuse and sexual violence. Following the implementation of the Act the *Gwent Social Housing Domestic Abuse Partnership – The Free from Fear project* has identified a number of areas that are important to ensuring that they achieve effective multi-agency working and ensure that social landlords are able to identify and support survivors effectively.

We believe that this sort of multi-agency working which draws on the sharing of resources will have an impact on progressing the Act and tackling violence against women, domestic abuse and sexual violence.

We know that our members have challenges for example in assessing some instances of Anti-social behavior (ASB) which may be linked to domestic abuse, and that they continue to work to find ways to work with other agencies to support those affected.

- **What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?**

Our members work with tenants who are vulnerable and make efforts to ensure that their voice is included in tenant forums, but we are aware that this process is not always an easy one. We believe that survivors can be included through creating forums of support where, as survivors they can provide each other with moral support as well as access support and counselling if required.

The report from Welsh Women's Aid shows that there are currently no mechanisms in place to allow engagement with a wide range of survivors about what is important to them, and as a result the process of engagement is currently very ad-hoc and very much concentrated on the same groups.<sup>1</sup>

The *Gwent Social Housing Domestic Abuse Partnership- The Free from Fear Project* is currently working on best ways to capture tenant's experiences. We believe that work from this project could be shared not only among social landlords but across other areas to show how affected tenants' voices are being captured and experiences used to create best practice.

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<sup>1</sup> Welsh Women's Aid *Are you listening and am I being heard?* March 2016



- **Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

We are not in a position to address this question fully but we know from our members that there are challenges for survivors of abuse, as provision of services is not necessarily joined up in all areas.

We know through our work lobbying for continued supported funding (SP) that specialist services continue to face challenges with financial cuts and that this area of support may be under threat. CHC is working with partners to advocate the continuation of SP funding as a vital link for those who are vulnerable, including those facing domestic violence, abuse and sexual violence.

This challenge and the introduction of LHA rates on housing benefit is a challenge for specialist providers and one that will require continued focus by all involved so that services are not reduced or totally eliminated.

- **Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

We believe that the role of the National Adviser can have independence from the Welsh Government and that working in partnership with partners can help the National Adviser in promoting the needs of people facing domestic violence, abuse and sexual violence and tackling these issues across Wales.

- **To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

We are unable to comment on this.

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Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Undeb Cenedlaethol y Myfyrwyr Cymru

Response from: National Union of Students Wales

## 1. NUS Wales

- 1.1. National Union of Students in Wales (NUS Wales) is the largest democratic organisation in Wales, representing learners in a wide variety of settings including higher education and further education, adult community learning and apprenticeships.

## 2. General Comments

- 2.1. We welcome the opportunity to respond to the Equality, Local Government and Communities Committee's (the Committee) post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. NUS Wales has previously submitted evidence to all stages of the Act, and we recognise that the Committee has made this their first inquiry of the Fifth Assembly.
- 2.2. The Welsh Government, as the Committee will be aware, has an active consultation on the National Strategy and the framework for delivery. This therefore makes it relatively challenging to accurately assess how the aims of the Act are being met, and so we hope that this will be re-examined on an annual basis.
- 2.3. We welcome the opportunity to put on record that this is indeed a gendered issue. Statistics heavily demonstrate that these types of actions overwhelmingly affect women and children. Of course, these crimes do also happen to men but the Act has to be about addressing the devastating fallout that thousands of women and children suffer every day.
- 2.4. That being said, the Act runs the risk of being operating in a gender binary (just "women" and "men"). These repugnant crimes also affect non-cisgendered members of society, including those in transition, and more has to be done to recognise that within the remit of the Act.
- 2.5. Despite the Act and its implementation still being in its infancy, there have been a number of statistical releases recently which have been linked to the Act. For instance, reporting of gender-based violence has increased, as well as reports of sexual assault. It is not clear whether or not these figures indicate simply a rise in reporting, or a rise in cases, so it would also be advised for the Committee to take evidence from groups such as Rape Crisis.
- 2.6. We would also like to draw the Committee's attention to recent media concerns that Women's Refuges are in danger of funding cuts, and the associated impact this may have on Wales (particularly in North Wales). As the above evidence suggests, there has been a simultaneous increase in cases alongside a decrease in funding. More has to be done to ensure that Women's Refuges will be safeguarded in Wales, no matter from where women are coming.

- 2.7. NUS Wales does have concerns, which we have previously raised, that the current Act focuses on domestic abuse at the potential expense of sexual violence and tackling violence against women.
- 2.8. We would welcome the opportunity to meet Committee Members and to give evidence in person to a full session.

**3. Question 1:** *To what extent is the approach to tackling violence against women, domestic abuse and sexual violence improving as a result of the obligations in the Act?*

- 3.1. This is extremely difficult to judge accurately at this stage. The Act received Royal Assent in April 2015, and the Welsh Government is currently consulting on the Strategy and five year Framework. It should also be noted that this is one of the first pieces of legislation of its kind, and as such it is challenging to find comparable success measures. NUS Wales does fully support the Act and believe that it is a vital step in tackling and eliminating violence against women.
- 3.2. The obligations of the Act that have been delivered thus far are encouraging. The Welsh Government has consulted already upon the training modules for staff in the public sector with responsibility for the Act, and NUS Wales submitted to these modules. The National Adviser has been appointed and has begun work, and the Welsh Government is consulting on the development of the National Strategy. These are all actions that will focus on delivery of the Act in the long-term and should be welcomed.
- 3.3. The Criminal Prosecution Service's (CPS) [report](#) on Violence Against Women and Girls demonstrates that there has been an increase of 11% in prosecutions of Violence Against Women and Girls, as well as prosecutions of "revenge porn". The latter crime is also overwhelmingly dominated by crimes committed against women and girls.
- 3.4. While an increase in prosecutions is an encouraging sign that governments across the UK are prioritising violence against women, it should be noted that these laws and their consequent enforcement are not devolved matters. We would be interested to learn what the Welsh Government's Strategy will contain when it comes to working with the four police forces in Wales. It is also important that there is parity in provision and intent in each of the forces.
- 3.5. It should also be noted that Rape Crisis have conducted [research](#) that shows only 15% of those who experience sexual violence choose to report it to the police. While these figures are from 2013, it raises a valid concern: are these prosecutions a result of an increase in reporting, or because of an increase in these crimes?
- 3.6. NUS research also shows that 75% of students are unaware of how to report incidences of sexual violence and abuse while at university. This goes alongside further evidence of 75% of young women students in Wales experienced emotional abuse from a partner.
- 3.7. Therefore, while the intentions of the Act appear to be being met it is still far too early to fully assess whether the obligations have been delivered. It is

encouraging that the CPS and governments are recognising that these crimes are not limited to strictly physical abuse, but extend to online and mental abuse.

4. **Question 2:** *What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?*
  - 4.1. The most important area to consider when it comes to the reporting, and consequent experiences of survivors further down the line, is the way in which it is done. The mental trauma of reporting these experiences is difficult enough, and can often be exacerbated by the physical act of going to a police station. Alternative methods of reporting, that are readily advertised, would be a welcome step. This could include an anonymous online which would allow for crime to be investigated without necessarily beginning formal criminal proceedings, particularly where there is a child (or children) involved.
  - 4.2. The All Wales Domestic Abuse and Sexual Violence Helpline, which took its first call in 2004, may also be a potential avenue to follow up the experiences of survivors.
  - 4.3. Welsh Women's Aid published the "[Are you listening, am I being heard?](#)" survivor consultation in March this year. This kind of work was extremely progressive in gathering these responses, and it would be worth the Committee taking further evidence on ways in which this research can be built upon.
  - 4.4. A lot of research, when it comes to survivors, does not include populations in shared/group residences such as care homes and halls of residence for students. Efforts should therefore be made to gather research and evidence from these groups.
  - 4.5. We believe that this is an absolutely pivotal element of the Act, and we would suggest the Committee dedicates significant resource to helping Welsh Government create a strong system for gathering the evidence of survivors.
5. **Question 3.** *Whether survivors of abuse are beginning to experience better responses from the public authorities as a result of the Act, particularly those needing specialist services?*
  - 5.1. It is too early to accurately assess this question. Local authorities will need to develop local strategies to be implemented from 2018 onwards, which is informed by the current Welsh Government consultation. However, further consideration and follow up of the above evidence to the Welsh Women's Aid consultation may shed light on this query.
6. **Question 4.** *Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?*
  - 6.1. NUS Wales has welcomed the creation of the post of the National Adviser. The role has brought a vitally needed leadership and expertise in tackling Violence Against Women, and we fervently believe that the position should be offered the resources to enhance their work. We are concerned, however, that their existing remit does not go far enough.



- 6.2. The current [remit](#) of the Adviser does not currently have the power to sanction organisations that are failing to work towards ending violence against women. NUS Wales believes that an expansion of the existing remit should be considered, to consider whether any powers of sanction is something that would be possible under the existing devolution format.
- 6.3. The annual report that is produced by the Adviser also needs to include a strong mandate for clear actions to act upon the findings of the report. We would also ask the National Assembly and the Welsh Government to consider whether an annual report is enough.
- 6.4. There has been a particular concern amongst NUS Wales' membership for the impact of violence against women in non-devolved functions (immigration laws and the like). The National Adviser must be able to consider and make recommendations on tackling violence against women even with regards to non-devolved areas.
- 6.5. We are also concerned at the potential lack of support and infrastructure below the National Adviser to embed long-lasting change.
7. **Question 5.** *To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?*
- 7.1. NUS Wales believes that healthy sex and relationship education is absolutely essential for the school curriculum. Children and young people must be taught that VAW, abuse, domestic violence and sexist behaviour (not an exhaustive list) are all abhorrent and we welcome moves by the Welsh Government to implement healthy relationships education.
- 7.2. NUS Wales argues for healthy sex and relationship education from Key Stage 2 and above, with appropriate age-level teaching. This will ideally include conversations around both femininity and masculinity. The social focus around the latter element is often highlighted as a rationale for committing gender-based violence. NUS Wales believes that this Act has the potential to create lasting change, beyond the scope of the next five years.
- 7.3. It is also essential to raise that reporting of sexual and domestic violence against LGBT+ individuals is on the rise. This raises particularly issues when it comes to later potential treatments, and it is of the utmost importance that this Committee also considers the potential of introducing Gender Identity Clinics in Wales.
- 7.4. The previous points will enable teachers and parents to be able to have these discussions with children, both at school and home. This will lay the foundations for a changing social dynamic, in which children and young people will be comfortable to discuss "awkward" issues and be able to recognise gender-based and domestic violence.
- 7.5. NUS Wales find it encouraging that the existing guides have been developed in partnership with organisations such as Welsh Women's Aid, and we would strongly support more guidance and training to be developed in partnership with Third Sector experts.



- 7.6. There must also be a whole-school approach to SRE that begins at Key Stage 2. We would welcome the opportunity to provide further evidence to the Committee on this priority campaign.
- 7.7. Consent education should be included in any SRE curriculum. Education around healthy relationships and consent should also continue to focus on perpetrators and remove the stigma of victim blaming. This includes noting that VAW is a gendered issue and a form of gender-based discrimination, which was extensively debated during the original renaming of the Bill.
- 7.8. NUS Wales would also urge the Committee and Welsh Government to do more to monitor how many schools are adopting the good practice guide, and to identify areas where schools are failing to do so.
- 7.9. NUS Wales welcomes the opportunity to respond to this consultation, and we look forward to working with the Committee during the duration of the Fifth Assembly.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Dinas a Sir Abertawe

Response from: City and County of Swansea

**1. To what extent the approach to tackling VAWDASV is improving as a result of the Act**

The Act has pushed forward the VAWDASV agenda in Swansea giving the impetus for organisations to improve the response across all sectors and services. The Act has enabled organisations across the City & County to have guidance on improving their responses, and currently, focus has been on 'Ask & Act' and the Training Framework. Improvements are currently being made in ensuring a robust framework and pathway of care by embedding the 'Ask & Act' in service structure, policy and provision. To further this approach, we have developed a DA Strategy Group which includes high level members from a number of organisations including the council, police and health. This Group will ensure a consistent approach across all services. It has been positive to see that organisations such as housing associations and third sector agencies have started to make changes and look at the way they work as well as public sector organisations. Since the implementation of the Act in April this year, it has been too short a time to effectively evaluate any improvements in tackling VAWDASV as the majority of the work has been around discussions on implementing new structures needed to deliver the provisions in the Act.

**2. What are the most effective ways of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?**

To effectively capture the views and experiences of survivors a number of different options must be available to ensure all survivors are comfortable in feeding back in ways which are practical and suitable to their needs. Since 10,000 Safer Lives we have had a number of survivor groups which have fed back into our local work.

Currently we use a number of ways to capture survivor feedback, these include; traditional Survivor Groups/forums, Survey Monkey, feedback/comment forms and Facebook page. We use these as ongoing feedback and also do one off pieces of work to capture specific feedback. Options are also available around language needs. Survivor feedback is fed back into the DA Partnership from a number of partner agencies plus the DA One Stop Shop. We recognise the value of this feedback and use it to inform our partnership work. It has recently been agreed that there will be a Survivor Rep on our DA Monitoring & Delivery Group which will help implement the Act. It is too early to capture to what extent this survivor input will have, as it is still at the implementation stage.

**3. Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the act, particularly those needing specialist services?**

As stated above, it is too early to evaluate whether or not survivors are beginning to experience better responses because of the Act. Work is currently being done on strengthening pathways and models of care and haven't as yet been rolled out. Training is being rolled out across the area with access available to both statutory and 3<sup>rd</sup> sector organisations which will upskill and make staff aware of VAWDASV.

**4. Whether the National Advisor has sufficient power and independence from the Welsh Government to ensure the implementation of the Act?**

The National Advisor has been a welcome addition. The Advisor is seen by some as a Welsh Government appointment so further work needs to be done on ensuring people are aware of the independence of the post and its remit. It is too soon to see how the role will develop in terms of having sufficient power and independence.

**5. To what extent the Good Practice Guide to healthy relationships is successfully influencing the development of a whole school approach to challenging VAWDASV?**

Without there being a statutory duty placed on schools, they still have the option of non-engagement in healthy relationship sessions. The Good Practice Guide is a useful tool in pushing the VAWDASV message forward and is well written, but too many schools do not engage in the Agenda or engage in a meaningful way. In those schools that engage with the work of the VAWDASV agenda, it is a useful tool in guiding them to develop a whole school approach. The Whole School Approach has meant the SPECTRUM has been successful in delivering programmes in schools, but WG money could have been better spent on funding local schools' Healthy

Relationships programme. Swansea has its own RAY (Reduce Abuse in Youth) Project which has been developed with local knowledge in mind, and delivered by workers who know the specific issues that local schools are reporting.

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Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Hywel Dda Health board

Response from: Hywel Dda Health board

Although this act has not been fully implemented as yet within Hywel Dda, we are currently in the process of undertaking a mapping and scoping exercise. There are two HB's across Wales who have been identified as early implementation sites, with a lot of learning emerging from these areas that will inform implementation across Hywel Dda and other Health Boards in Wales

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Barnardos Cymru

Response from: Barnardos Cymru



## 1. Information and working context of Barnardo's Cymru

Barnardo's Cymru has been working with children, young people and families in Wales for over 100 years and is one of the largest children's charities working in the country. Barnardo's Cymru services in Wales include: care leavers and youth homelessness projects, young carers schemes, specialist fostering and adoption schemes, family centres and family support, parenting support, family support for children affected by parental imprisonment, domestic abuse and parental substance misuse, short breaks and inclusive services for disabled children and young people, assessment and treatment for young people who exhibit sexually harmful or concerning behaviour and specialist services for children and young people at risk of, or abused through, child sexual exploitation and young people's substance misuse services.

Every Barnardo's Cymru service is different but we always strive to secure better outcomes for more children. We use the knowledge gained from our direct work with children to campaign for better childcare policy and to champion the rights of every child. We believe that with the right help, committed support and a little belief, even the most vulnerable children can turn their lives around.

- **This response may be made public.**
- **This response is on behalf of Barnardo's Cymru.**

**1.**

Barnardo's registered Charity Nos. 216250 and SCO37605  
Rhifau Cofrestru'r elusen Barnardo's 216250 a SCO37605

## **1. Introduction**

- 1.1. We are a major third sector provider of support services to vulnerable children, young people and their families across Wales. We are directly commissioned to support families on the basis of domestic abuse in two local authorities; however an internal audit suggests that at least two thirds of the services we provide deal with domestic violence issues on a regular basis as part of their work to support families.
- 1.2 We recognise that children and young people exposed to parental conflict, domestic abuse and violence experience trauma and we have invested in the pilot of an evidenced and innovative assessment and intervention model with Professor Gordon Harold so that we can support better well-being outcomes to children and their families.
- 1.3 We also provide specialist services to children and young people at risk of or abused through child sexual exploitation; with sexually harmful behaviour or who are the victims of child sexual abuse. On this basis we lobbied during the passing of the Act for a stronger education and prevention offer and stronger provisions to meet the support needs of children affected by trauma through exposure to domestic violence or as the victims of abuse.

## **2. Response on improvements in response as a result of obligations under the Act; better responses from public authorities and capturing the views and experiences of survivors.**

- 2.1 We believe that is too early to say with any certainty that the Act is having a significant impact on levels of response, support or on opportunities for survivors to express their views. This should also be seen in the context of pressures on public spending and the introduction of new requirements under the Social Services and Well-being (Wales) Act and the Well-being of Future Generations (Wales) Act at the same time as new obligations under the (VAWDASV) Act have been introduced. We have not been aware of any additional resources for services directed at supporting survivors and their children.
- 2.2. However we do believe that public authorities are giving the obligations of the Act the deserved attention and priority. We are involved in local and regional planning and development processes in some areas and we are confident that these address the policy intent of the Act. However it is too early and perhaps unreasonable to comment on any implementation gap.
- 2.3. As an organisation we already had internal processes in place to inform and support robust responses to the issues covered by the

Act. However the Act provided the impetus for an event for all managers from across Wales to consider the new obligations, workforce implications and further promotion of the principles of the Act through our policies and practice. The National Advisor attended the event and spoke to our staff body about the Ask and Act Duty and her expectations of the workforce and of organisations such as ours. The implementation of the legislation is also a standing item on the agenda of our Equality and Diversity Board. In this way the Act has provided a clear focus on the issues for social care professionals and practitioners.

### **3. National Advisor**

- 3.1. The National Advisor has engaged with us in relation to our role as a provider of services to children, young people and families affected by the issues which the Act seeks to address. There is an on-going and useful dialogue with meetings in place and requests from the National Advisor for updates on our progress in further developing evidenced practice in these areas. As stated above the National Advisor has also addressed our managers and set out her expectations of them.
- 3.2. We do not feel that the current National Advisor's position is compromised and we are confident that she would provide appropriate challenge to Welsh Government and other relevant parties where necessary. We know that the National Advisor is also working closely with the Future Generations Commissioner and the Children's Commissioner to support a joined up approach to implementation of the Act. However we believe that it would be beneficial for the National Advisor to be given greater powers and to be appropriately resourced.

### **4. Good practice guide to healthy relationships**

- 4.1. We are aware of the good practice guide and were engaged in the process of development of the guide in a limited way. We cannot evidence the impact (or not) of the guide on the development of whole school approaches to challenging violence against women, domestic abuse and sexual violence at this time.
- 4.2. Our experience is that the issues are taken seriously by Education Safeguarding Leads at the local authority level and that they are fully engaged in the agenda, however there are still some schools that fully embrace the need to tackle these issues and others that do not.
- 4.3. We were commissioned by Welsh Government to develop a CSE Education Resource in 2015 which is available free to schools and to deliver implementation training across Wales earlier this year. We have also met with officials taking forward the PSE curriculum as part of the current curriculum reform programme and we have



agreed to share any free resources we have available to support teachers via the Welsh Government approach moving forward.

- 4.4. However we remain concerned that some schools will not fully embrace a whole school approach in the absence of any statutory requirement to do so. So that children and young people in some schools will enjoy such an approach and will have an education which supports keeping them safe and informed, while other children and young people will receive a minimum education on understanding the issues. We are also concerned about the need for the development of appropriate resources and guidance to support the education of children and young people with additional learning needs.

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Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Cymorth I Ferched Cymru

Response from: Welsh Women's Aid



**Live Fear  
Free Helpline**

Providing confidential support  
and information on domestic  
abuse, sexual violence and  
violence against women in Wales

**Llinell Gymorth  
Byw Heb Ofn**

Darparu gwybodaeth a chefnogaeth  
cyfrinachol ynghylch trais domestig,  
trais rhywiol a thrais yn erbyn merched  
yng Nghymru

**0808 80 10 800**



**Cymorth i Ferched Cymru  
Welsh Women's Aid**

**Rhoi Merched a Phlant yn Gyntaf  
Putting Women & Children First**

## Welsh Assembly Committee on Equality, Local Government and Communities

### Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence Act 2015

#### Consultation Response by Welsh Women's Aid

<b>Names:</b>	<i>Gwendolyn Sterk, Public Affairs Manager</i>
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<b>Address:</b>	<i>Pendragon House, Caxton Place, Pentwyn, Cardiff CF23 8XE</i>
<b>These are the views of:</b>	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

#### 1. About Welsh Women's Aid

- 1.1 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.
- 1.2 Established in 1978, we are an umbrella organisation that represents and supports a national federation of 23 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 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 Welsh Government funded Live Fear Free Helpline; a National Training Service; refuge and advocacy services in Colwyn Bay and Wrexham; and the national Children Matter project which supports local services to help children and young people affected by abuse and to deliver preventative STAR group-work in every local authority in Wales.
- 1.3 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.



**Live Fear  
Free Helpline**

Providing confidential support  
and information on domestic  
abuse, sexual violence and  
violence against women in Wales

**Llinell Gymorth  
Byw Heb Ofn**

Darparu gwybodaeth a chefnogaeth  
cyfrinachol ynghylch trais domestig,  
trais rhywiol a thrais yn erbyn merched  
yng Nghymru

**0808 80 10 800**



**Cymorth i Ferched Cymru  
Welsh Women's Aid**

**Rhoi Merched a Phlant yn Gyntaf  
Putting Women & Children First**

## **2. Welsh Women's Aid's Evidence for the Post Legislative Inquiry: Overview of key issues**

- 2.1 The Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (the Act) has been recognised internationally as ground breaking piece of legislation aimed at improving the response of the public sector in the prevention of all forms of violence against women and the protection and support of those that experience it.
- 2.2 The Act, given the legislative duties it introduces for devolved public services, offers an opportunity for Wales to provide leadership and innovation in preventing future violence against women as well as enabling earlier and more effective intervention and support for survivors and their families. This said, there is a need for the duties in the Act to be effectively implemented by public services, with the support of robust, sustainable specialist services in the third sector, and for the efficient monitoring and evaluation of the duties implementation to ensure that aims of the Act are achieved and the results sustainable. Overall there has still been limited statutory guidance published by Welsh Government to provide the strategic leadership for regional and local delivery that the Act requires.
- 2.3 Critically the implementation of the Act and the resultant Strategy needs to ensure that it is based firmly on the understanding that violence against women is a cause and consequence of inequality between women and men and is a violation of women's human rights. The internationally accepted definition of 'Violence Against Women' used by organisations including the United Nations, World Health Organisation, Council of Europe and UK Government, which was included in the first Wales violence against women strategy ("Right to be Safe", 2010-2016) is: "any act of gender-based violence that results in, or is likely to result in, physical, sexual or mental harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life."<sup>1</sup> While the Welsh Government has made statements in accompanying documents that recognises the evidence that women and girls suffer disproportionately from these types of violence, this was not reflected in the definitions of the Act (which we raised as a problem at the time, but were advised that the internationally accepted definition of violence against women would be addressed in the strategy).
- 2.4 The refreshed National Violence Against Women Domestic Abuse and Sexual Violence Strategy (2016-2021) must be published by November 2016 in accordance with the Act. However this has yet to be completed, and the draft refreshed national strategy out for consultation does not contain UK and internationally accepted definitions of domestic abuse, sexual violence and violence against women, for monitoring and strategic delivery purposes. It is vital that Welsh Government demonstrates leadership and commitment to the internationally recognised definition of violence against women within its national strategy. Otherwise this puts Wales out of step with the UK and international evidence and will have a detrimental impact on the development of strategic collaborative commissioning, service development and data collection in Wales. Using the term 'Violence against Women' does not

<sup>1</sup> United Nations: 'Declaration on the Elimination of Violence against Women', General Assembly  
<http://www.un.org/documents/ga/res/48/a48r104.htm>



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exclude men and boys but recognises the gendered nature of these types of abuse and the gendered differences in impact of perpetration and victimisation. It is important that the implementation of the Act enables gender responsive models of support to enable the best outcomes for all survivors.

### 3. Overview of the context for the implementation of the Act

3.1 Scrutiny of the implementation of the Act needs to be situated within a broad context. Violence against women cannot be tackled in isolation and the support and protection of survivors does not occur in silos. Violence against women is a truly cross cutting issue and its prevention and the protection and support of survivors should be considered core business and a priority for all government departments, public services and communities in Wales. While the Act provides a tool for Welsh Government to demonstrate strategic leadership to prevent violence against women, it is also important to recognise that the duties in the Act also intersect with a number of other Welsh, UK and international legislation and policy priorities. Incorporating how Welsh Government embeds violence against women prevention into these other delivery plans and meets UK and international obligations will also be critical to review within the scrutiny process, if the committee is going to be successful in its aim. These include the following:

3.1.1 Social Services and Wellbeing (Wales) Act 2014 is a key piece of legislation which is shaping changes to the preventative agendas for health and social care services, and which has the potential to have a positive impact on the prevention of violence against women and maximising support of survivors. However at present there is little evidence of an integrated approach to delivery nationally or locally. In particular, there is scope to align the population needs assessments that local authorities are completing as part of the Social Services and Wellbeing (Wales) Act 2014 with the need for violence against women thematic needs assessments.. There is also scope to coordinate the development of outcomes frameworks and training for public service professionals required by both Acts.

3.2.2 The Wellbeing of Future Generations (Wales) Act 2015 sets out seven wellbeing goals that are relevant to the prevention of violence against women and supporting survivors. This includes an equal Wales, a resilient Wales and a healthy Wales. Public sector bodies have to take action to achieve these goals, yet to do so effectively they need to take action to end violence against women as a cause and consequence of inequality between women and men and which has a significant impact on the health and wellbeing of survivors and their children. Leadership from Welsh Government to ensure public service boards prioritise violence against women prevention within their development and delivery of well-being goals and plans would go some way towards aligning these integrated priorities. For example:

- **A more prosperous Wales:** Well-being plans need to recognise that domestic violence alone costs Wales £303.5m annually: £202.6m in service costs and £100.9m to lost economic output. These figures do not include any element of human and emotional costs, which the research estimates costs Wales an additional £522.9m. In addition, those who experience violence will be adversely affected in both education and work. Each year, one in ten victims of partner abuse takes time off work as a result of the



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abuse. By incorporating approaches to prevent violence against women, domestic abuse and sexual violence, Wales will be more prosperous with regard to public spending, and also in terms of personal ability to earn, learn and succeed.

- **A Wales of cohesive communities:** Violence against women prevention and work to promote cohesive communities are interlinked. Tackling violence against women will lead to safer communities, and reduce further social exclusion of already marginalised groups, for example Black and minority communities, refugees, and lesbian, gay, bisexual and transgender (LGBT+) communities. Tackling violence against women will also challenge social stigma, which will promote inclusiveness and better community ties.
- **A healthier, more equal Wales:** a society that enables people to fulfil their potential no matter what their background or circumstances requires equality between women and men. As such tackling violence against women and its cause and consequence, through funding specialist services that help prevent violence and abuse, will lead to greater equality between men and women in Wales. We cannot achieve the goal for a healthier Wales; a society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood, without preventing violence against women. The World Health Organisation has stated that violence against women is a 'global health problem of epidemic proportions'. By funding services that prevent violence against women, Wales will see a positive increase to people's physical and mental health, a reduction in problematic substance use, as well as improved resilience and recovery from trauma associated with violence against women and adverse childhood experiences.

3.3.3 The Housing (Wales) Act 2014 enshrines in legislation duties on local authorities to prevent and alleviate homelessness. It has long been recognised that domestic abuse and other forms of violence against women is a leading cause of homelessness for women. To prevent homelessness it is critical that the duties imposed by the new housing legislation enable survivors to access refuge services and other accommodation options swiftly, or where appropriate and safe to do so, to stay safely within their own homes. Domestic abuse is not always being effectively identified as the cause of homelessness as survivors presenting as homeless often have multiple support needs that could include debt, substance misuse, mental health support needs, as well as needing support to recover from the debilitating impact of domestic abuse. This raises the concern that the full extent of need is not being recorded to inform the evaluation of support provided and the commissioning of relevant provision in a locality. There is a need for the integration of measures and duties between the two Acts so that they are aligned to ensure a strategic and holistic approach to delivery.

3.3.4 The current curriculum review being carried out by Welsh Government aims to support children and young people to be healthy, confident individuals, ready to lead fulfilling lives as valued members of society. To achieve this the curriculum will need to include preventative programmes regarding all forms of violence against women based on principles of gender equality and human rights. Work is also ongoing in the development of the





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Wellbeing Area of Learning and Experience under the new curriculum for Wales however it remains unclear as to whether healthy relationship education will be prioritised within this. Healthy relationships education needs to be more than a single lesson about domestic abuse or sexual relationships, it needs to be ongoing age appropriate lessons covering gender stereotyping, sexual consent, sexuality and respect. At present this is not consistently available to children and young people in Wales. As the lead organisation in Wales on ending violence against women we would welcome further consultation on the inclusion of effective healthy relationship education in the new curriculum, because as yet specialist services have not been involved in this review. As is discussed further below we have developed toolkits and guidance that could inform this work as well as having developed our own preventative programme, STAR (Safety, Trust and Respect), for young people.

3.3.5 The Home Office Ending Violence Against Women and Girls Strategy sets out the UK Government plans to address and prevent violence against women and girls until 2020. While some areas are devolved to Wales, significant areas such as criminal, civil and family justice remain non-devolved. It is critical that the implementation of the Act is carried out with the collaboration of those responsible for delivering non-devolved priorities. National and local strategies and delivery plans need to ensure there is join up with the Home Office strategy. Similarly it is vital for survivors that may move between England and Wales that there is a consistency in the quality and accessibility of support and protection.

3.3.6 The EU Victim's Rights Directive establishes a new legal standard for victim services, and obligations include a minimum level of provision of specialist services and support for victims of domestic abuse and other forms of violence against women, regardless of nationality or citizenship status, including support for the children of victims. Support includes information, advice, practical, emotional, and psychological support. At present there still remains a postcode lottery in the provision of specialist services across Wales. Current local and regional commissioning of specialist services are not effectively addressing provision of specialist support in a strategic, evidence-based, joined up and sustainable manner. Feedback from survivors states that there is a need for more timely, accessible and needs-led support services.<sup>2</sup>

3.3.7 The Council of Europe's Convention on Preventing and Combating Violence against Women and Domestic Abuse (the 'Istanbul Convention') sets out clear measures on how to prevent violence against women and support victims. Covered within the scope of the convention is the adequate geographic distribution of short and long-term specialist services that are accessible to all women and their children. Within the draft National Strategy on Violence against Women, Domestic Abuse and Sexual Violence, Welsh Government has stated that it supports the principles of the convention however it is selective in the articles it links

<sup>2</sup> 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



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the strategy too. At present the draft strategy does not reference if or how the Welsh Government will adhere to the minimum level of specialist support outlined within the convention.

- 3.4 All of the above are critical cross cutting priorities and those responsible for the effective implementation of the Act need to deliver on these in order to successfully achieve its aims and obligations. They should also be used by the Committee to inform the post-legislative scrutiny to ensure that the Act is not being treated as an 'add on' to other delivery plans but is embedded across the strategic and delivery functions of Welsh Government and relevant authorities.

#### **4. To what extent is the approach to tackling violence against women, domestic abuse and sexual violence improving as a result of the obligations in the Act?**

- 4.1 The Act has the potential to significantly improve the approach to tackling violence against women by setting out obligations based on improving arrangements for prevention, protection and support. Although all aspects of the Act have been enacted, implementation has been limited. The Welsh Government refreshed National Strategy is out for consultation, and in that it outlines its 'good progress on implementation' which includes "publish[ing] the National Training Framework [and] e-learning package...developing "Ask and Act" ... [and] publish[ing] a Whole Education Approach Good Practice Guide". It also claims "significant steps to reduce the incidence, and to protect victims of Female Genital Mutilation, Forced Marriage and Honour Based Violence" have been made, but it is not clear what these entail.
- 4.2 The obligations within the Act also offer an opportunity for the Welsh Government to provide strategic leadership through the publication of various statutory guidance that should aim to radically improve and change approaches in tackling all forms of violence against women. These included a national training framework, a whole education approach, and statutory guidance on multi-agency working and commissioning of specialist services. At present only one piece of statutory guidance has been published and is in very early stages of implementation, with limited data provided to measure this improvement or establish a clear baseline on which to evaluate the improvements, and the others have yet to be published. So it is not possible to measure improvements at this stage.
- 4.3 Under the Act obligations for prevention, the Welsh Government, in conjunction with Welsh Women's Aid, developed the Whole Education Approach: A Good Practice Guide (<http://gov.wales/docs/dsijlg/publications/commsafety/151020-whole-education-approach-good-practice-guide-en.pdf>). The document sets out guidance for embedding the prevention of violence against women in educational settings. The guide outlines nine key elements that would ensure a comprehensive and holistic approach to prevention of violence against women, domestic abuse and sexual violence. In combination with this, Welsh Women's Aid, in partnership with AVA (Against Violence and Abuse), were also commissioned by Welsh Government to research and compile a package of recommended materials to be utilised as





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best practice in relation to these matters for use in primary, secondary and further education settings. This suite of resources is presented as an overarching toolkit which should be used with the accompanying guidance across education settings. This work was completed and submitted in early 2016 but has yet to be published. We have recently been advised the toolkit is to be launched in September 2016 and is intended to complement the aforementioned Good Practice Guidance.

- 4.4 The Welsh Government guidance on delivering a whole education approach to preventing violence against women has been recognised as good practice by the Westminster Women and Equalities Committee's inquiry and report into sexual harassment and sexual violence in schools. However we are yet to see a clear plan as to how and when schools and other education establishments will be implementing this guidance, and there is little current evidence of this being implemented consistently across Welsh schools and other educational settings. A thematic review by Estyn is due to be carried out this autumn which should provide a clearer picture of the extent to which action on violence against women prevention has been taken so far. This thematic review should establish a baseline to demonstrate the current position and provide clear recommendations on improving schools' response based on the good practice guidance. The review should also establish a clear set of questions that can be built in to Estyn's regular reviewing of schools to ensure the monitoring of the implementation of the guidance and its effectiveness. Similarly, effective data and monitoring, as is set out in the good practice guidance and Act, needs to be published on a regular basis so that a clear baseline is known from which improvement can be monitored and lessons learnt. The Act allows Welsh Ministers to require local authorities, through regulations, to report on the steps they have taken to address violence against women, domestic abuse and sexual violence through their education functions however as of yet this information has not been gathered so a clear national picture is still not known on which to base any assessment of improved provision.
- 4.5 The Welsh Government published the National Training Framework (NTF) as a key mechanism for delivering its obligations to improve responsible authorities' responses to violence and abuse within the Act. The National Training Framework should increase earlier intervention and protection of survivors by ensuring high quality and consistent training is available to those across the public and specialist sector. 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."<sup>3</sup> Whilst the e-learning training has been developed and is being rolled out, there have been problems with accessing this for all 'Group 1' professionals. Training for Group 2 and Group 3 professionals is being delivered through 'ask and act' training (see below). Specialist sector training for Group 4 professionals has been commissioned to enable Independent Advocates and sexual violence services to access 'free' specialist accredited training, but the largest number of professionals in Group 4 – frontline professionals working within refuge-based services – have not been able to access

<sup>3</sup> 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



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subsidised accredited training due to lack of Government resources.4.6 The “Ask and Act” framework has been developed and draft guidance was issued in 2015 for consultation, but has not since been published. The ‘Ask and Act’ Framework aims to provide training targeted at those professionals within the public sector that are ideally placed to carry out early identification and provide a helpful response to survivors, which should include referring them to specialist services. This approach is being developed in early adopter sites in Gwent and Abertawe Bro Morgannwg University Health Board. Welsh Women’s Aid secured the contact to deliver the Ask and Act ‘train the trainer’ contract for Group 2 and Group 3 professionals and its delivery is underway in these sites. The extension of this training programme to other regions across Wales was scheduled from September, but the approach for cascading this statutory training to other areas as originally envisaged is now under review by Welsh Government.

4.7 While the commitment outlined in the ‘Ask and Act’ framework is to increase identification and improve responses by the public sector to violence against women, domestic abuse and sexual violence is welcome, there are a number of issues that need to be addressed to ensure that it enables an improvement in the response to survivors:

4.7.1 There is a need for alignment of the delivery of the NTF 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 given the priority needed.

4.7.2 It also needs to be recognised that the roll out of the NTF will increase the identification of survivors experiencing abuse and will increase referrals to specialist domestic abuse and sexual violence services in the third sector. At present there is an assumption that specialist services will simply accept these referrals without additional resources, and that these services will be available to meet demand from increased referrals. However, there is already high demand for these services, which cannot be met. In 2015/16 in Wales:

- 11,512 women, men, children and young people were provided with refuge and community based advocacy and support by Welsh Women’s Aid member services in Wales;
- At least 388 survivors of abuse in Wales could not be accommodated by refuges because there was no space available in the refuge when they needed help. Many individual services also operate lengthy waiting lists for aspects of their community provision that are in high demand (eg counselling, groupwork, support for children and young people).
- There were 28,392 calls to the Live Fear Free Helpline in Wales, and 14,612 survivors were supported by the service.

4.8 With the introduction of the Act, demand for services is likely to increase. It is critically important that the specialist services that support survivors of abuse have the funding and



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capacity to respond to any increase in demand, to ensure the services being offered are safe and meet needs.

- 4.9 The Welsh Government has still to publish its statutory guidance for multi-agency working (which was out for consultation in 2015), guidance for working with perpetrators (which was consulted on with the Advisory Board in 2015), and guidance for commissioners. These are critical guidance to support the aims of the Act as they should require effective strategic leadership and commissioning of service provision by local service boards.
- 4.10 The delay in publishing commissioning guidance is a concern as commissioning processes, particularly regarding Supporting People funded services like specialist floating support and refuges, are already taking place in a number of local authorities without the strategic guidance from Welsh Government having been published. Without the overarching guidance there are inconsistencies in what is being commissioned and how it is being carried out. There are also inconsistencies in the responsibilities being taken by relevant authorities and limited collaboration between commissioners.
- 4.11 This is impacting on the sustainability of specialist services. The Welsh Women's Aid state of the sector report (published in September, and accompanying this submission) 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.
  - This year's cuts follows funding cuts last year for 58% of refuge services in Wales.
  - 92% of refuge services in Wales identify funding and service continuation as being the main challenge facing their organisation this year.
- 4.12 In the absence of Welsh Government statutory Commissioning Guidance being published, Welsh Women's Aid worked with Lloyds Bank Foundation to produce Tackling Violence against Women, Domestic Abuse and Sexual Violence: A Collaborative Commissioning Toolkit for Services in Wales (Aug 2016). This toolkit was produced simultaneously with a domestic abuse toolkit for covering non-devolved areas with partners in England. The toolkit has been endorsed as good practice by the National Adviser for Wales and it was developed in consultation with Welsh Government officials. The toolkit provides an expert guide to achieve a whole system approach to commissioning services for violence against women, domestic abuse and sexual violence. Getting the commissioning of services right is vital to making sure they are accessible and available for the people that need them. There now needs to be leadership in promoting this toolkit to enable regional and local areas to achieve collaborative commissioning across Wales.

**5. What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?**



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- 5.1 Welsh Women's Aid advocates that understanding how survivors use and experience services (or don't use them) is key to improving the effectiveness of services and systems aimed at prevention, protection and support. We have obtained external Trust funding to develop a national survivor participation framework for Wales using Survivors Empowering and Educating Domestic Abuse Services (SEEDS) model which enables survivors to engage in local and national decision making regarding services. The SEEDS model aims to provide a voice for survivors, increasing understanding about the experience of domestic abuse amongst those working in the statutory sector. The aim is to use a model that works with survivors to obtain their views about the effectiveness and value of local services; to raise awareness of other relevant issues; and to empower survivors to move forward in their lives by making positive use of their experiences.
- 5.2 The SEEDS model can provide a consultation service to enable agencies to understand survivors' perspective; contribute to training events and the production of training materials; give presentations to increase staff awareness and understanding of incidents and the impact of domestic abuse.
- 5.3 Further to this Welsh Women's Aid and our members carry out engagement with survivors to make sure the experiences and needs of survivors are central to all we do. In Spring 2016, Welsh Women's Aid worked with the National Adviser and an independent facilitator to run a series of focus groups with survivors of violence against women, domestic abuse and sexual violence across Wales. This offered an opportunity for a broad spectrum of survivors to voice their experiences about using services and explain what improvements might be made to inform recommendations. The findings set out clear priorities for action that will inform the national strategy as well as being shared with relevant authorities to inform needs assessments and other local decision making. A copy of this report is provided as an attachment, which includes the top priorities survivors felt Welsh Government should address, following enactment of provisions within the Act. These are:
- 5.4 It is vital that survivors are kept at the heart of all discussions about them in the implementation of the Act. Our work on developing a national survivor participation framework for Wales over the next two years should assist and support the delivery of the Act at a national and local level.

## **6. Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

- 6.1 Welsh Women's Aid has been resourced by Welsh Government to deliver a national accreditation framework for specialist services, by working with a team of independent quality assessors to roll out National Quality Service Standards. Specialist domestic abuse services that are working towards or have attained the quality standards can evidence their effective response to survivors of violence and abuse across a range of measures. Survivors who need to access specialist services can either self refer, be referred via the Live Fear Free Helpline,





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or referred by public or other third sector services. Provisions in the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 places increasing responsibility on public authorities to identify and refer survivors to specialist services. The national training framework and a whole education approach, if implemented correctly, will also encourage local public services, schools and youth services to refer survivors, including children and young people, to specialist services in local communities.

- 6.2 At present no National Indicators have been published as set out in the Act, because there are no national violence against women outcomes developed to align with the National Strategy, to measure progress (the strategy is due to be published by November). So there is a limited baseline from which to measure the improvement of responses. While the Act does set out an ambition to improve responses, measurement of this is limited.
- 6.3 Welsh Women's Aid survivor consultation report - *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)* - provides feedback from survivors of their experiences of responses by public authorities and the improvements they would like to see that should inform the delivery of the Act. In the consultation carried out with survivors, they spoke about the need for improved responses by public services in identifying and enabling disclosures of abuse and enabling them to access the support they needed. One of the key concerns of survivors was knowing about availability of specialist services and being able to access them when and where they needed them. ***Please see the attached report that provides feedback on the problems survivors continue to experience with seeking help and support from public services.***
- 6.4 Survivors in rural areas raised particular concern about the accessibility of services and the need to know that they can trust local professionals in the public sector due to the small communities they lived in. Welsh Women's Aid is working with partners in Powys to pilot a community engagement scheme to improve awareness of domestic abuse and the help available amongst professionals working in local community services (Ask Me scheme). This aims to create safe disclosure points for survivors in their local communities beyond public sector and specialist services where it is safe for survivors to disclose the abuse they are experiencing and get the right signposting so that they can access the right support when they need it. It will equip members of the local community such as hairdressers or local shop assistants with the basic knowledge, skills and tools to have a supportive conversation and provide an initial safe response. It builds on the Ask and Act framework and creates a holistic community response to violence against women, domestic abuse and sexual violence.
- 6.5 The implementation of the obligations of the Act should reflect the need to fundamentally review and change systems and processes. As a means of achieving a better response to survivors Welsh Women's Aid recommends that the evidence-based principles and approach outlined in our 'Change that Lasts' service model be adopted across Wales. This model, developed with resources from Welsh Government, 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



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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. If changes were made to meet survivors' needs from the outset (as is designed to do through our 'Change that Lasts' model), then resources would be saved and survivors of abuse would achieve a much greater positive benefit from their interaction with public authorities.

## **7. Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

- 7.1 Welsh Women's Aid welcomes the creation of the independent Ministerial Adviser role. The role is an opportunity to provide leadership and accountability for the violence against women agenda in Wales. The role offers a unique opportunity to provide the necessary machinery for ensuring strong leadership and to introduce processes for scrutinising delivery, monitoring and evaluating progress made.
- 7.2 Whilst we recognise this, we do not think that the role currently has sufficient power, resources and independence in terms of holding Welsh Government and other public bodies accountable to their obligations within the Act. At present the role is part time and has no budget so it is limited in the leadership and action it can take. Without sufficient resource and capacity, the National Adviser's role is not able to have the impact or importance of that of a commissioner (compare, for example, with the roles of the Well-being of Future Generations Commissioner, Children's Commissioner and Older People's Commissioner).
- 7.3 We recognise the role's function in providing guidance and monitoring activities however it remains unclear what the remit is if the role needs to advise Ministers or challenge Welsh Government or other public bodies about not fulfilling their statutory duties. It is unclear what sanctions will take place if these legal duties are broken, and how these sanctions will be imposed. Sanctions are absolutely vital if the legislation is to 'have teeth' therefore clarity is needed on whether imposing sanctions on non-compliant organisations is a statutory function to be fulfilled by the Adviser or another body.

## **8. To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

- 8.1 The UN Rapporteur on Violence against Women recommended in her UK report in 2014 that action was taken to ensure a holistic approach to prevention of violence against women and girls by including appropriate and comprehensive sex and relationship education in schools as a compulsory subject; providing adequate training to teachers and other school staff; and developing gender-specific prevention policies.
- 8.2 Schools and other educational settings play a key role in the prevention of violence against women and girls. This is vital to prevent future domestic and sexual violence as well as tackling the abuse and violence children and young people are currently experiencing. Data published



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violence against women in Wales

Llinell Gymorth  
Byw Heb Ofn

Darparu gwybodaeth a chefnogaeth  
cyfrinachol ynghylch trais domestig,  
trais rhywiol a thrais yn erbyn merched  
yng Nghymru

0808 80 10 800



in September 2015 revealed that 5,500 sexual offences were recorded in UK schools over a three year period, including 600 rapes<sup>4</sup>.

- 8.3 As stated above the Welsh Government Good Practice Guidance on Whole Education Approaches developed in conjunction with Welsh Women's Aid along with the suite of resources in the accompanying toolkit (forthcoming) provide an effective mechanism for embedding a preventative approach within education settings in Wales. Additionally work has been carried out to support young people to develop tools for educational settings where positive attitudes toward gender equality and healthy, respectful relationships can be fostered by young people now and in the future. Welsh Women's Aid has been working in partnership with Cardiff University and NSPCC Cymru, supported by the Office of the Children's Commissioner for Wales, to support young people to develop the forthcoming guide 'Agenda: A Young People's Guide to Making Positive Relationships Matter' (see <http://learning.gov.wales/resources/browse-all/keeping-learners-safe-conference-2015/?lang=en>).
- 8.4 All of these are effective in establishing a best practice basis on which to embed a whole education approach in Wales, however there is currently little evidence of this being consistently rolled out across Welsh schools and other educational settings. Additionally clarity is needed about how healthy relationship education will be included within the new curriculum review. The development of the new curriculum and the process of national and local implementation of provisions contained in the Act offers an opportunity to ensure all children and young people have access to effective gender equality and healthy relationship education as well as support in their own right as survivors of violence against women, domestic abuse and sexual violence.

## 9. Conclusion

- 9.1 While the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 along with other related legislation sets out the principles of prevention, earlier intervention and collaborative working the act needs leadership, resources and effective integration of this being core business into and across all Government departments and public service boards, to achieve effective implementation and in turn to make a real difference to the lives of women and children in Wales.
- 9.2 Welsh Women's Aid welcomes the opportunity to provide evidence to the committee on the post-legislative implementation of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. In particular, we **would welcome the opportunity to provide oral submission to the Committee, on behalf of specialist domestic abuse/violence against women services in Wales.**

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<sup>4</sup> <http://www.bbc.co.uk/news/education-34138287>



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**Cymorth i Ferched Cymru  
Welsh Women's Aid**

**Rhoi Merched a Phlant yn Gyntaf  
Putting Women & Children First**

Welsh Women's Aid would like to thank the Equality, Local Government and Communities Committee for the opportunity to comment on this important consultation and we look forward to working together in the future.

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

**Gwendolyn Sterk, Public Affairs Manager**

**02920 541 551**

[gwendolynsterk@welshwomensaid.org.uk](mailto:gwendolynsterk@welshwomensaid.org.uk)



### [Annex A: 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.

### [Annex B: Saving Services to Save Lives](#)

Report on the State of the Specialist Domestic Abuse Sector in Wales, 2016

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot

Response from: Neath Port Talbot County Borough Council

**1. To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

- 1.1 It is our opinion that it is too early to say as it is still very early in the implementation of the Act. Leadership arrangements to support the partnership required to implement VAWDASV in Neath Port Talbot County Borough Council have been considerably strengthened and the leadership group includes national representation from Women's Aid which is much appreciated.
- 1.2 We have made an early start on developing the local strategy required under the Act, however, the requirement for a local strategy does not sit comfortably with other requirements imposed by the Social Services and Wellbeing (Wales) Act 2014 which is requiring an input to the development of the population assessment in a different timetable to the VAWDASV. This is unhelpful.
- 1.3 We are aware of the National Training Framework however, delivering the Framework is problematic as there are no new identified resources to support this within agencies who are already struggling to deliver on a broad policy agenda which includes, for example, Counter-terrorism training as part of the PREVENT strategy, the Wellbeing of Future Generations (Wales) Act 2015; the Social Services and Wellbeing (Wales) Act 2014; as well as training emanating from the Fairer Futures Division to support the strengthening of community cohesion, eg Hate Crime Training; Modern Slavery Training; Gypsy Traveller Training etc.
- 1.4 The development of the local strategy is requiring application of resource that is not covered by existing funding streams. The development of commissioning arrangements is made overly complex by the plethora of specific grants that underpin much of the service delivery in this area, all of which have different conditions attached. There is an urgent need to put specific grants into base budgets to ensure that local commissioners have the degree of flexibility needed to set clear priorities and develop more

responsive services to meet the needs of people affected by gender based violence. In particular, Supporting People, Substance Misuse, Welsh Government, Home Office, Families First funding streams need to be “pooled” in order that the new Partnership can exercise the new responsibilities the Act envisages. We would be very happy to pilot such an approach.

1.5 In our earlier responses to consultation exercises we expressed concern that many of the initiatives will lead to more victims being identified, but without the benefit of any additional capacity being created in provider agencies. Ask and Act is being piloted in ABMU Health Board and it is becoming evident that funding to specialist services will need to be properly examined if we are to ensure that new people identified as needing support can access that support in acceptable timescales. We urge the Welsh Government to ensure that the pilots are properly evaluated before they are scaled up to avoid a position where large numbers of new people are identified to find themselves then unable to access services for some considerable time, during which period many cases are likely to escalate.

1.6 We have received confused messages about local and regional responses to people affected by gender-based violence. In our view, there are a range of responses that need to be delivered locally; there are some that lend themselves to wider area working and others that may be more effectively planned at an all-Wales level. We urge the Welsh Government to allow local partnerships to work this complexity through so that we can end up with a set of arrangements that is better fit for purpose.

**2 What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act’s provisions?**

2.1 In NPT all of the specialist service providers engage with service users via groups, feedback forms etc. Commissioners also have a range of evaluation methods in operation.

2.2 As part of the development of the local strategy, we have engaged with survivors from the outset to understand what works and does not work from their perspective. We are also committed to putting in place mechanisms to regularly receive feedback and input from survivors as we mature our strategy development and delivery arrangements.

**3. Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

3.1 It is too early to make this assessment. Ask and Act is in a pilot phase and there has actually been a reduction in funding for specialist services as a result of the prevailing financial climate with further cuts in grant funding expected. Coupled with the complexity of trying to join up disparate grant funding schemes it is unlikely that survivors will have seen much positive change.

**4. Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

We consider it too early to make this assessment. We have had limited communication with the National Adviser and would welcome an opportunity to strengthen links between the Council, its partnership arrangements and the National Adviser. It is important that the democratic mandate of elected Assembly Members and local councillors is properly balanced with any powers that are provided to the National Adviser.

**5. To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence**

5.1 It is too early to assess this.

**6. FURTHER CONCERNS**

6.1 The Act is ambitious in what it seeks to deliver in outcome terms for people affected by gender based violence. However, the resource implications of implementing the Act remains a concern for us. As identified above, many of the initiatives will lead to the identification of more people who will need help and support, but the grants and funding that support service delivery are being reduced. It is also a cause for concern that whilst the Act seeks to bring about a significant change for people affected by gender-based violence, the funding that remains available is still time limited and not part of core budgets. This means

that it is difficult to sustain a quality specialist workforce and is an issue that we encourage Welsh Government to address as a matter of priority.

6.2 The requirements to develop and implement a local Strategy cannot be accommodated within the role of the Domestic Abuse Co-ordinator and additional resources have needed to be identified at a local level to deliver the statutory requirements. This is not a sustainable position.

6.3 Lines of communication between Welsh Government and local government need to be urgently clarified so that we can develop an effective collaborative approach to securing the outcomes that the Act seeks to achieve. There are a range of stakeholders who need to contribute to this work, but, importantly, there are specific duties placed upon health boards and local authorities in the Act but no adequate forum for discussion how those specific duties can be most effectively discharged.

6.4 We responded to a number of consultations on draft guidance to support implementation of the Act. However, we have had little feedback on what amendments, if any, the Welsh Government intend to introduce and the timetable for publishing final guidance. We have previously made representation that the draft guidance includes many “requirements” that the Welsh Government would not appear to have power to impose.

PLVAW 30

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Ddiogrlach Cymru

Response from: Safer Wales



## Safer Wales Consultation response – September 2016

The Equality, Local Government and Communities Committee (the Committee) is undertaking a post legislative inquiry into the [Violence against Women, Domestic Abuse and Sexual Violence \(Wales\) Act 2015](#) (the Act).

The Committee's predecessor in the Fourth Assembly, the [Communities, Equality and Local Government Committee](#), was responsible for scrutinising the Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill before it was renamed and became an Act. CELG Committee [reported on the Bill](#) in November 2014.

Safer Wales is an independent Wales-based charity, dedicated to protecting the vulnerable, victims of crime, and victims of poverty and multiple-deprivation, especially women and girls, children and young people and other vulnerable people.

Safer Wales originated in Cardiff Safer Cities Project (1994-1997) which exited as the charity Safer Cardiff in 1998 and re-launched as Safer Wales in 2006. Our roots are therefore in evidence-based multi-agency interventions to increase protection of vulnerable individuals, to reduce offending and the risks of offending and to develop preventive activities including influencing policy and practice. Part of Safer Wales' aim is to continue to innovate new projects where we perceive gaps in service delivery, to evaluate them and to use the evidence to impact policy and practice change

At Safer Wales, we believe in helping vulnerable people to become safe, but also helping them to learn to protect themselves for the future, and to prevent further harm; ultimately being empowered to live their lives free of fear, and engage in productive activities in society, such as education, training, volunteering and employment.

### **To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

Wales should be proud of leading the way with this piece of ground-breaking legislation. It is important to celebrate and recognise the extent of good practice that has been developed in Wales since 2000, that has influenced the development and delivery of services across the UK and beyond.

At this stage it is too early for Safer Wales to comment on the improvements that the Act has made for VAWDSV. Safer Wales recommends that the term used in the Act 'Violence Against Women, Domestic Abuse and Sexual Violence' (VAWDASV) be used consistently by local authorities and other public bodies to reflect the terminology and vision of the Act. We believe that the use of different terms e.g Gender Based Violence will impact on local strategies, confusion of the wider issues



of VAWDASV and commissioning of services. In addition, Safer Wales would want agencies and Welsh Government to promote and use the UN definition.

Safer Wales promoted the importance of 'Ask and Act' in relation to VAWDASV with partners involved in criminal justice services. In particular, our services in HMP Eastwood Park and HMP Styal routinely ask and act upon VAWDASV disclosures. Thus, informing resettlement and safety planning for women leaving the secure estates who may otherwise have not reported VAWDASV.

Safer Wales would hope that approaches in response to VAWDASV would continue to embrace the multi-agency working that has been evident on Wales and reaches beyond the devolved areas. The impact of VAWDASV is clearly relevant to criminal justice services and has significant impact upon devolved areas in Wales.

There is uncertainty over local VAWDASV strategies and year on year funding cycles may threaten the viability of front line third sector providers, who are expected to support any increase with the implementation of 'Ask and Act and increased disclosure of VAWDASV.

**What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?**

Safer Wales has enabled people who access our services to share their experiences and views to support the implementation of the Act. Survivor engagement should be safe and appropriate and not a 'one size fits all' approach. Safer Wales provide gender informed services and in our experience, women who experience VAWDASV may feel that groups are more beneficial, however men often engage more with one to one activities. These approaches respond to gender, sexual orientation and other barriers which will impact on their engagement with this process.

Safer Wales is aware however, that many survivors may have different experiences within their journey, with different agencies. In a multi-agency context it is important that there is an independent feedback mechanism. Typically a survivor may speak to one agency about their experience elsewhere, and currently there is no space to share this feedback, or to ratify it. Perhaps there is a means of feeding back directly via the Specialist Advisor's office as "ombudsman"

However, Safer Wales recommend that online questionnaires should not be the only option used to gather survivors feedback and only used with a range of other techniques to gain survivors views and experiences.





All clients accessing Safer Wales have access to a range of feedback mechanisms, including our complaints procedures, and can have access to speak to someone senior within the organisation at any time should they have serious concerns.

Safer Wales recommend that Welsh women who experience VAWDASV who are in the secure estate in particular in HMP Eastwood Park and HMP Styal are able to share their views to inform the implementation of the Act's provisions. As the Resettlement provider for all women in HMP Eastwood Park and all women returning to Wales in HMP Styal, Safer Wales is in a position to facilitate such consultations.

Safer Wales supports people to take part in wider consultations which include, Legal Aid, HMIC and local needs assessments. Safer Wales recommend that this information is used to inform the implementation of the Act.

**Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

Safer Wales believe that this is still at the implementation stage and we are therefore unable to provide a full response at this stage to measure the public authorities response to survivors of VAWDASV. Safer Wales is working with Welsh Women's Aid and other partner organisations in the development of the 'Ask and Act' training for the pilot areas e.g Gwent and when this has been implemented this will provide us with the evidence

Safer Wales has adopted the 'Ask and Act' approach which our resettlement team at HMP Eastwood Park and HMP Styal are using to increase disclosures of VAWDASV. The Safer Wales team are asking every woman about VAWDASV and as a result of disclosure able to act to provide more robust resettlement and safety planning.

Safer Wales is aware that responses from public authorities for survivors vary quite substantially. This is particularly so where survivors are seen as an offender (regardless of the type of offence they have committed), or a survivor is challenging to services (possibly due to dual diagnosis or early/current trauma) or where a survivor may not have presented through the statutory route, for example reporting to the police.

**Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

Safer Wales welcomes the role of National Adviser; however we are concerned that this post is part time and does not have sufficient power and resources in terms of



holding Welsh Government and other public bodies accountable to their obligations within the Act.

Safer Wales recommends that the Advisor role be made full time to implement the VAWDASV Act and across other policy areas and Welsh legislation, for example Social Services and Well Being (Wales) Act, Future Generations (Wales) Act and Housing (Wales) Act.

**To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

The good practice guide to healthy relationships is a crucial document in raising awareness of healthy relationships within schools. It is vital that the prevalence of VAWDASV reduces and effective change needs to start from early years, creating culture shift. Safer Wales believes that VAWDASV educational programmes and learning should be compulsory across the whole school; through a whole school approach. It is still too early to establish whether the healthy relationships good practice guide has influenced the development of a whole school approach. Safer Wales, therefore recommends that a review of the impact and adoption of VAWDASV educational programmes and learning be undertaken within the next 12-18 months.

Safer Wales recommend that VAWDASV education programmes and learning are provided for young people who are not in formal education and developed for those in higher education.

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,

Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,

Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Y Gymdeithas Genedlaethol er Atal Creulondeb i blant

Response from: National Society for the Prevention of Cruelty to Children

### About the NSPCC

We're leading the fight against child abuse in the UK and Channel Islands. We help children who've been abused to rebuild their lives, we protect children at risk, and we find the best ways of preventing child abuse from ever happening.

Abuse ruins childhood, but it can be prevented. That's why we're here. That's what drives all our work, and that's why – as long as there's abuse – we will fight for every childhood.

We help children rebuild their lives, and we find ways to prevent abuse from ruining any more. Learning about what works in the fight against abuse and neglect is central to what we do. We are committed to carrying out research and evaluation to make sure the approaches we're taking are the right ones and we share what we have learnt with partners.

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NSPCC Cymru/Wales welcomes the opportunity to contribute to the Equality, Local Government and Communities Committee's Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. The Act is a landmark piece of legislation and we welcome the opportunity it provides to improve the public sector response and raise further awareness of domestic abuse and violence against women to prevent abuse and better protect and support survivors in Wales. Along with the Well-being of Future Generations (Wales) Act 2015 and the Social Services and Well-being (Wales) Act 2014, this is a key moment to break the cycle of domestic abuse and ensure that children are kept safe from abuse and neglect.

Domestic abuse, substance abuse and mental health problems are known risk factors for all forms of child abuse and neglect. These stressors often occur together, and have a cumulative effect - the more of them there are in the family, the greater the risk to the child. Reviews of cases where a

child has died or been seriously injured regularly find that some or all of these factors were present. In addition, their presence during pregnancy poses physical risks to unborn children.

Children who are abused and neglected are more likely to experience negative outcomes in adulthood including mental health problems, problems with substance use and live in households with domestic abuse. This risks the abuse and neglect to their own children.

The experience of living in a household where the parents or carers are abusive to one another *is* child abuse. Section 120 of the Adoption and Children Act 2002<sup>1</sup> amended the definition of harm to a child to include witnessing domestic abuse. A core priority of the NSPCC is to work with families facing adversities, including domestic abuse, and our focus is on supporting parents or carers with adversities to protect their children from abuse and neglect.

We note the draft National Strategy on Violence against Women, Domestic Abuse and Sexual Violence which is currently out for consultation. Both as an organisation and as a member of Violence Against Women Action Group we will be feeding in a range of comments and suggestions for improvement. Along with considering the implementation of the Act's provisions and its impact to date, NSPCC Cymru/Wales believes that the Committee should also take the current National Strategy consultation document into account.

We have focused our response on some key questions we feel that the Committee could focus on as part of this post-legislative inquiry.

## **1) A rights-based approach**

NSPCC Cymru/Wales believes that situating the development of the national and local strategies under Section 16 of the Act firmly within a UNCRC-based framework is important to ensure that the specific needs and vulnerabilities of children and young people are taken into account.

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<sup>1</sup> <http://www.legislation.gov.uk/ukpga/2002/38/section/120>

We note that a Welsh Language Impact Assessment has been completed alongside this draft Strategy and we would welcome assurances that a Children's Rights Impact Assessment (CRIA) has also been completed. We would recommend that this be made public alongside the final Strategy.

- **We ask that the Committee look into whether CRIAs have been completed for the Strategy and the Guidance published under the Act, and whether these CRIAs are adequate to ensure that the rights of children and young people have been considered.**

## **2) Definitions**

NSPCC Cymru/Wales shares the concerns of Welsh Women's Aid and the Violence Against Women Action Group about the definitions used in the Strategy. These definitions will steer regional and local commissioning and monitoring, and it's therefore vital that these are correct from the start. Currently the definitions used are not consistent with the United Nations, international and UK recognised definitions of domestic abuse and violence against women. The Right to be Safe strategy of 2010 included the internationally accepted definition of violence against women, placing it clearly within an equality and human rights framework. Changing this approach, we believe, represents a step backwards, and means that Wales is not aligned with the UK Government and other devolved nations.

- **We suggest that the Committee ask that the definitions used within the Strategy are amended to be in line with the UN, international and UK recognised definitions.**

## **3) Educating the Future Generation**

NSPCC Cymru/Wales believes that it's crucial to educate young people about healthy relationships if we are to break the cycle of domestic abuse. There is growing research evidence that patterns of sexual coercion and harassment are not confined to **older teens** but are also emerging in the everyday lives of **pre-teen children**.

In Wales, the 'Boys and Girls Speak Out' (2013) research carried out on behalf of the National Assembly for Wales Cross Party Group on Children's Sexuality, Sexualisation and Equalities (funded by NSPCC Cymru/Wales, Cardiff University and the Office of the Children's Commissioner for

Wales) revealed that most children age 10-12 reported either witnessing or experiencing direct or indirect incidents of sexual harassment, particularly slut-shaming and anti-gay talk (at school, in the street, and online), with gender stereotypes used by children and some staff to justify these forms of harassment. Overall the research found that children were ill-equipped to deal with sexual harassment and very few felt comfortable talking about these issues with parents or teachers.

Further evidence shows the scale of this problem:

- Data published in September 2015 revealed that 5,500 sexual offences were recorded in UK schools over a three year period, including 600 rapes.<sup>2</sup>
- In a study of young people by the NSPCC (2009), a quarter of the girls and 18 per cent of the boys experienced physical abuse; three quarters of the girls and 14 per cent of the boys experienced physical abuse, and a third of the girls and 16 per cent of the boys experienced some form of sexual partner violence.<sup>3</sup>
- Data from the NSPCC's ChildLine service reveals a culture of sexual harassment which, starting from their school relationships, extends across the spectrum of children's experiences, including online. It can leave them isolated, with many having no outlet to escape abuse.

**NSPCC Cymru/Wales believes that core and mandatory curriculum on healthy relationships taught from a gender equality perspective; co-produced with children and young people and delivered by appropriately trained practitioners is needed to ensure ALL school age children and young people receive a comprehensive and inclusive sexuality and relationships education that addresses the complex ways in which inter-personal gender-based and sexual harassment impacts upon their lives.**

We welcome that the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 included provisions to require local authorities to publish prescribed information to show how their education functions are being exercised to promote the purposes of the legislation. The legislation was also followed by the publication of Welsh Government Guidance on Whole School Approaches developed with Welsh Women's

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<sup>2</sup> <http://www.bbc.co.uk/news/education-34138287>

<sup>3</sup> *Barter et al (2009)*: School-based cross-sectional survey of 1500 young people aged 13 to 17 in England, Scotland and Wales and 80 interviews with young people (NSPCC funded);

Aid. However we were disappointed that the Welsh Government did not introduce mandatory healthy relationships education delivered through a whole school approach. We are aware that work is ongoing in the development of the Wellbeing Area of Learning and Experience under the new curriculum for Wales and would urge that provision should become mandatory as part of this process.

We are however strongly supportive of and have contributed content and case studies to the Welsh Government's Guidance on 'Good Practice on delivering Whole Education Approaches to Preventing Violence against Women, Domestic Abuse and Sexual Violence.' However, concerns do remain around implementation.

We believe it is important to unpick the practical steps schools need to take to successfully deliver all of the different elements of a whole school approach, and understand where the prevention of sexual harassment and violence sits within this scope. It is also important to understand the needs of schools and teachers to help them embed and deliver this approach successfully, consistently and safely.

As part of this, schools also need to be supported to incorporate innovative approaches. Cardiff University (Professor Renold), NSPCC Cymru/Wales and Welsh Women's Aid, supported by the Office of the Children's Commissioner for Wales have been working in partnership over the last year on '*AGENDA: A Young People's Guide to Making Positive Relationships Matter*'. AGENDA will be launched in November 2016 at the Pierhead Building. AGENDA is intended to be a change-making toolkit for young people who wish to get involved in promoting gender well-being and gender equalities for respectful and healthy relationships. AGENDA has been designed to showcase and provide practical examples of how change-making can be embedded in the learning process. **We believe it is imperative that children and young people's views are at the forefront of the development of PSE/SRE content on healthy relationships.** We would welcome the opportunity to share further information on AGENDA with the Committee.

Given that currently, PSE (and a comprehensive healthy relationships education programme) is not mandatory and as such, provision is at the discretion of each individual school, many teachers may find both time and resources for training hard to negotiate. Mandatory and regular training for all staff on by experts in the field of gender and sexuality education, violence against girls and women, and LGBTQ+ and transgender+ is imperative for the implementation of any education

approach and the whole-school approaches described above. There also needs to be clear guidance on how to create safe spaces for children to talk about and challenge everyday sexism and sexual harassment.

A fully resourced and regularly evaluated approach will be vital to achieving the prevention ambitions of the Act. We believe having a core mandatory curriculum, independently evaluated and inspected by Estyn (Wales) with evidenced based learning outcomes and resources is an essential part of ensuring consistency and quality.

We would also like to draw attention to our response to the Committee's Inquiry on its priorities, in which we suggested that the **Committee consider a joint inquiry with the Children and Young People's Committee into the impact of sexual harassment/violence on children and young people in Wales.** We believe this inquiry would be a timely means of assessing what needs to be in place to support this approach.

**We would suggest the Committee should:**

- **Examine what progress is being made at a local level to implement the requirements of the Act and what arrangements around training, monitoring, evaluation and inspection are being made to support schools and teachers to implement the Act.**
- **We would also suggest that the Committee could gather evidence by directly asking teachers and schools about their awareness of the Whole Education Approach Guidance and if so what they need to implement the provisions of the Act and what challenges there are in putting the Guidance into practice.**

**4) Powers of the National Adviser**

NSPCC Cymru/Wales is looking forward to working with the National Adviser to ensure implementation of the Act. However, as of yet it feels like early days to be able to comment on whether the National Adviser has sufficient powers and independence from the Welsh Government to do this. We would however welcome further scrutiny around what role the National Adviser will have in ensuring scrutiny of local strategies by Local Authorities and Local Health Boards and how they will be supported by Welsh Government to fulfil this role. The National Strategy consultation document does not currently mention the National Advisor which is concerning. As such it is difficult to understand the role the Advisor will



play in supporting relevant authorities to deliver on the requirements of the Act. We would also welcome further clarity about the role the National Advisor has played in the development of the National Strategy document. This leads to a further more general question about governance and accountability. Who is accountable for the delivery of the local strategies and how will local delivery be scrutinised?

- **We would suggest that the Committee consider asking how the National Adviser will play a role in ensuring that there is adequate scrutiny and consistency across the Local Strategies.**
- **We believe the Committee should seek evidence from the National Advisor on how far her powers are supporting her in her role as established by the legislation.**

## **5) Guidance**

NSPCC Cymru/Wales welcomed the opportunity to comment on the draft guidance that has been published to accompany the Act: the National Training Framework, Ask and Act and Multi Agency Collaboration and the Perpetrators Guidance. However we have concerns about the impact of the delays in publishing these pieces of guidance, especially as the National and Local Strategies that are required by the Act should have regard to this guidance. We are particularly concerned that Commissioning Guidance has not been published which should aim to ensure that no matter where a victim lives, there is a strong public and specialist service ready to help. Without specific guidance for local commissioners to support their commissioning of specialist services under the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, we believe there is a risk that services for children and young people will not be given the adequate and consistent attention across all areas of Wales that they need. We also believe that such guidance is vital to support a holistic approach at a local level that combines to create a strategically joined-up and consistent approach to service users across Wales.

- **We suggest that the Committee look into timescales for publication of the range of guidance and assess the potential impact of the delays on the implementation of the Act.**

## **6) Services**

We welcome the inclusion of Support as a priority in the National Strategy consultation document. We know that the impact of abuse can include

mental health problems such as anxiety, depression, substance misuse, eating disorders, self-harm, anger and aggression, sexual symptoms and age inappropriate sexual behaviour.<sup>4</sup> Receiving the right support at the right time can mean the difference between overcoming their trauma, or a life shaped by the horror of their experiences. However, we remain concerned that there remains a severe lack of evidence about 'what works' for children who are abused due to witnessing or experiencing domestic abuse. Support can take many forms and it's important that those who are commissioning services take a holistic approach. It also remains the case that children are rarely given opportunities to express their views about what they feel is effective and become involved in decisions about the type of services they need.<sup>5</sup>

- **We would suggest that the Committee ask what services are available to children across Wales and assesses the need for a further gaps analysis and guidance on the evidence there is about 'what works' for children.**

We welcome that the National Strategy document and forthcoming Perpetrators Guidance recognises that working with perpetrators of VAWDASV has to be a key plank of any strategic approach to prevent violence against women and domestic abuse. However we would suggest that Guidance is necessary to ensure this is understood as part of a holistic approach. We believe that relevant authorities need stronger guidance on the minimum standards for service provision.

- **We would suggest that the Committee look into the availability and effectiveness of programmes that work with perpetrators to address their behaviour.**

## **7) FGM**

NSPCC Cymru/Wales remains concerned about the lack of clarity over how Female Genital Mutilation (FGM) fits under both the Act and the draft Strategy. The relevant authorities covered by the Act need better guidance on what can be done to prevent FGM and support those affected by it. Although there is reference to FGM in the draft National document

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<sup>4</sup> Lanktree, C. B, Gilbert, A. M, Briere, J, Taylor, N, Chen, K, Maida, C. A and Saltzman, W. R (2008) Multi-informant assessment of maltreated children: convergent and discriminant validity of the TSCC and TSCYC. *Child Abuse Neglect* 32 (6) pp. 621-625

<sup>5</sup> Radford, L., Aitkin, R., Miller, P., Ellis, J., Roberts, J., and Kirkc, A. (2011). *Meeting the Needs of Children living with domestic abuse in London*. London: Refuge/NSPCC research project, funded by the City Bridge Trust.

under the Prevention strand, we believe that more work needs to be done to mainstream its inclusion across the whole document. The Welsh Government, with the establishment of the Wales National Strategic HBV Leadership Group and delivery plan has instigated a strategic approach to attempting to tackle HBV/FGM in Wales and the document should be more reflective of this. There is also key work in data collection and Health that could be better reflected and should be better communicated from a National to Local level. We would recommend that the Committee seeks formal input from the Strategic Leadership Group (SLG). Part of the work by the SLG work includes funding and support for the Voices over Silence project, which saw NSPCC Cymru/Wales and Bawso work with a group of 16 young women during a 6 month period to upskill them as youth ambassadors on FGM and co-create resources which aim to spark conversations about FGM in schools and communities across Wales.

- **We suggest that the Committee to consider whether there is sufficient guidance on HBV under the Act and the draft Strategy for bodies to be able to engage with strategic action needed to prevent HBV/FGM and adequately support those affected by it.**
- **We would suggest that the Committee seeks evidence from the Wales HBV Strategic Leadership Group.**

## **8) Sexual Violence**

NSPCC Cymru/Wales is concerned that the main focus of the draft Strategy is on Domestic Abuse, meaning that Sexual Violence and Violence against Women are not as adequately incorporated into the document. We also note that Child Sexual Abuse is mentioned in the Strategy (on page 10), however there is lack of clarity around how this fits under the Strategy.

- **We suggest that the Committee seek clarity on whether Child Sexual Abuse falls under Sexual Violence as covered by the Act.**

## **9) Survivors' Voices**

We welcome the fact that the draft strategy has been informed by the recommendations and priorities of Welsh adult survivor voices. We want to emphasise how important it is that the voices of children and young

people are taken into account as part of this process. It remains the case that children are rarely given opportunities to express their views about what they feel is effective and become involved in decisions about the type of services they need.<sup>6</sup> NSPCC has recently engaged with a Young Experts group (young people with experience of abuse) who have developed a set of child-centred principles that should underpin future services to support children and young people who have been abused.<sup>7</sup> NSPCC Cymru/Wales are also in the process of consulting with children and young people to find out what they want from services with a view to developing a set of Listening Standards. These will be available in early 2017. We would be happy to share our learning with the Committee.

- **We would suggest that the Committee consider how the voices and experiences of children and young people can meaningfully inform the implementation of the Strategy and Guidance under the Act.**
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**We would be pleased to discuss any of the areas we have outlined in our response in further detail if that would be of help to the Committee.**

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<sup>6</sup> Radford, L., Aitkin, R., Miller, P., Ellis, J., Roberts, J., and Kirkc, A. (2011). *Meeting the Needs of Children living with domestic abuse in London*. London: Refuge/NSPCC research project, funded by the City Bridge Trust.

<sup>7</sup> <https://www.nspcc.org.uk/globalassets/documents/research-reports/its-time-campaign-report.pdf>