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Welsh Women's Aid Short Response to UK Government's Transforming the Response to Domestic Abuse Consultation

About Welsh Women's Aid

Welsh Women's Aid is the umbrella membership organisation in Wales that supports and provides national representation for 23 independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (our membership of specialist services).¹ These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is 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. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors.

We also deliver direct services including the Welsh Government funded Live Fear Free Helpline; a National Training Service; the national Children Matter programme of work which, for example, supports local services to help children and young people affected by abuse and to deliver preventative Safety, Trust and Respect (STAR) programmes across Wales, and refuge and advocacy services in Colwyn Bay and Wrexham. We are piloting the Survivors Empowering and Educating Services (SEEdS) project, which is empowering survivors of violence and abuse to collectively influence and inform services and commissioning frameworks, and help change attitudes.

We also deliver the Wales National Quality Service Standards, a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found here: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)

Welsh Women's Aid welcomes the opportunity to respond to the Transforming the Response to Domestic Abuse consultation by the Home Office and Ministry of Justice. The legislative and non-legislative programme being proposed provides an opportunity to create effective change to improve prevention, protection and provision in England and Wales. In Wales, it offers an opportunity to align work across devolved and non-devolved areas to ensure no survivor is left behind, all perpetrators are effectively held to account and we have a coordinated approach to preventing abuse and violence for future generations.

This response highlights the priority areas we feel must be addressed to achieve these ambitions. We have set out recommendations that we feel must be included at a minimum to ensure policy and practice is effective.



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This response aligns with those submitted by Welsh Women’s Aid and the wider specialist sector in Wales. It has been informed by our knowledge and expertise in providing support and protection to survivors, holding perpetrators to account and working towards ending domestic abuse, sexual violence and other forms of violence against women and girls.

1. Robust statutory definition

Welsh Women’s Aid welcomes the widening of the definition to encompass patterns of behaviour as well as incidents, include coercive control and economic abuse. However, it is concerning that the proposed statutory definition moves away from aligning the definition of domestic abuse as a form of violence against women and girls (VAWG) in line with the UN and Welsh Government definitions of VAWG. The legislation must ensure that the definition allows for a gendered understanding of domestic abuse and aligns it as part of the continuum of violence and abuse women and girls experience in society. We welcome and support that this will be outlined in the statutory guidance to accompany the definition. It is critical that the definition allows for the understanding that domestic abuse is a gendered crime, which is deeply rooted in societal inequality between women and men.¹

Survivors have raised concerns about the importance of recognising the coercive and controlling behaviour and abuse that occurs post separation. They have highlighted that there can be an increase in coercive and controlling behaviour, stalking and harassment after the end of a relationship. Research has shown that 90% of survivors report experiencing abuse post separation.² It is also well documented that this can be a time of increased risk so it is critical to recognise that post-separation domestic abuse is recognised within the statutory definition and in any required responses that follow on from that.

The inclusion of familial abuse in the definition allows for the recognition of abuse by family members and multiple perpetrators, which has been welcomed by some survivors of domestic abuse. However there is a concern this dilutes and conflates domestic abuse (intimate partner abuse – often characterised by coercive controlling behaviour) with other forms of abuse (child to parent abuse, elder abuse etc.) Both the definition and the wider consultation document does not currently set out how the statutory definition or the proposed legislation will align with other legislation and policy on forced marriage, so called ‘honour based violence’, elder abuse and child abuse. Without clear distinctions these different forms of abuse risk being amalgamated with intimate partner violence and the specialist responses needed to address them. This raises the risk that specialist support for survivors of these forms of abuse, may then go unrecognised. This has been evidenced within domestic homicide reviews: where the relationship has been familial rather than an intimate partner relationship. Research has shown the dynamics underpinning the homicide are different therefore requiring different identification, assessment and management.³ A clear distinction between intimate

¹ United Nations (UN) Declaration on the elimination of violence against women 1993.

² Kelly, Sharp and Klein (2014) Finding costs of freedom Report: How women and children rebuild their lives after domestic violence, CWASU

³ Nicola Sharp-Jeffs and Liz Kelly, Domestic Homicide Review (DHR) Case Analysis: Report for Standing Together, June 2016



partner abuse and child to parent abuse, elder abuse etc. is needed to ensure appropriate responses are developed, commissioned and delivered.

It is important to note that there are some limitations to a statutory definition. Domestic abuse does not happen outside of society, and as the tools of society change so does domestic abuse. This is most recently demonstrated by the use of digital technology and social media by perpetrators to extend their abusive behaviour online and utilise these mechanisms as means of coercion and control. It is, therefore, important that a statutory definition has the flexibility to encompass the changes in society that capture future aspects of domestic abuse that are yet unknown.

The definition needs to be clearly communicated to frontline practitioners across public services. This includes through appropriate guidance and training. We welcome the proposal to accompany the definition with statutory guidance for professionals who have safeguarding obligations. We believe that this statutory guidance should go beyond those with safeguarding obligations to inform all statutory agencies as outlined under section 1B of the consultation.⁴

It will be important that commissioners have an obligation to adhere to the statutory guidance to ensure that they have a clear understanding of the remit and scope of their commissioning and procurement processes. The guidance must ensure that this guidance applies across different statutory agencies to allow for joined up commissioning approaches. This will be particularly acute in Wales where commissioning of provision falls across the responsibility of devolved and non-devolved statutory agencies.

To ensure that the guidance is embedded training will be needed for frontline practitioners and strategic leaders to ensure that there is leadership, commitment and a shared understanding throughout all agencies. Training should be embedded within vocational and professional development for key professions and not be a 'one-off' training session to ensure that it is effective. A clear plan is needed to ensure that barriers to attending training, particularly experienced by professions such as GPs or judges, can be overcome. To do this it will be vital to ensure that domestic abuse, sexual violence and other forms of VAWG are covered any initial vocational training as well as on going professional development.

We believe that the inclusion of 16-17 year olds within the definition has had a positive impact, which has enabled greater recognition of domestic abuse happening amongst young people and improved access the support they need when they need it. It is however critical that the age limit does not hinder agencies responding to domestic abuse in relationships earlier than 16years old or inhibit an appropriate response and early intervention.

Recommendations:

1. Ensure the definition adequately recognises the experience of coercive and controlling behaviour post separation.

⁴ Armed forces, Children's services, Court staff, Education professionals (for example teachers, school staff), Fire brigade, Health professionals, Housing staff, Jobcentre staff, Judges/magistrates, Police, Probation/Criminal Rehabilitation Company staff, Prosecutors, Providers of adult social care, Commissioners of adult social care services (local authorities and clinical commissioning groups), Social workers.



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2. Ensure that the definition and the guidance allow for a gendered understanding of domestic abuse linked to the UN definition of VAWG.
3. Ensure the guidance provides clear distinction between intimate partner abuse and child to parent abuse, elder abuse, and other familial violence to ensure appropriate responses are developed, commissioned and delivered.
4. The statutory guidance should apply to all statutory agencies outlined in section 1B and inform commissioners.
5. The guidance should be embedded through adequate training across strategic and frontline professionals.
6. Maintain the inclusion of 16-17 year olds within the definition.

2. Broaden the remit to cover sexual violence and all other forms of VAWG

We are concerned by the narrow remit of the proposed legislation and the notable absence of sexual violence or any alignment to forced marriage, so called honour based violence, female genital mutilation (FGM) or prostitution legislation, policy and practice. The legislative and non-legislative programme should cover all forms of VAWG and be clear how these are interrelated within the continuum of violence and abuse women and girls experience. For instance it is not clear how the proposals for the Domestic Abuse Protection Orders would align to Forced Marriage Protection Orders even though there are likely to be survivors that fall within the remit of both.

The lack of inclusion of all forms of VAWG has particular connotations for Wales where public services already have duties under a new violence against women, domestic abuse, sexual violence legislative framework. We need to ensure that the definition and duties align across devolved and non-devolved areas both strategically and in frontline practice.

In Wales, the legislation and practice reflects the reality that survivors may experience a myriad of different forms of abuse and violence in their lives, not solely within an intimate partner relationship, but across a range of settings and situations. There is a need for commissioners to understand the distinct responses needed for domestic abuse, sexual violence and other forms of VAWG to ensure that there is holistic specialist support available to meet all the needs of survivors. Without the inclusion of all forms of violence against women, including sexual violence, in this proposed legislation, we risk that sexual violence and other specialist support that survivors need will be further marginalised and ignored by commissioners.

In Wales, there is a need to work together on domestic abuse, sexual violence and other forms of VAWG as issues which crosses the boundaries of devolved and non-devolved areas of responsibility and this needs to be effectively acknowledged and clarification received on how this will be achieved within the non-legislative programme. While there is reference made to engaging with Devolved Administrations this does not necessarily follow through to a commitment to collaborative or joined up approaches within the objectives and priorities set out.

Recommendations:

1. Expand the proposed legislative and non-legislative programme of work to include sexual violence and other forms of VAWG.



2. Set out how policy and practice aligns across domestic abuse, sexual violence and other forms of VAWG.
3. Set out clearly how collaboration will be enabled to ensure the proposals create improvements to effective working between devolved and non-devolved public services.

3. A Violence against Women and Girls Commissioner

Welsh Women's Aid welcomes the creation of the independent commissioner role. The role is an opportunity to provide leadership and accountability for the VAWG agenda in England and 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. An annual reporting mechanism, including a published report, will be required to enable this and allow for recommendations to be set and taken forward.

We believe the new commissioner should have a broad VAWG remit. Their role as a figure head who will 'stand up' for survivors and holding statutory agencies to account on their behalf means that they cannot prioritise the different experiences of survivors of domestic abuse, sexual violence and other forms of VAWG. This will be critical in their role in ensuring local areas plan and deliver an integrated approach to supporting all survivors and holding perpetrators to account.

To carry out the functions outlined by the government it will be critical that the role has sufficient powers, resources and independence in terms of holding the UK Government and other statutory agencies accountable to their obligations. This should reflect the scale of VAWG in England and Wales to have the impact across all areas they will need to cover. It will also be critical that the role will require someone with sufficient expertise in the field of VAWG and an ability to remain independent. This will require a robust and transparent recruitment process for the role.

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 challenge the UK 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 commissioner.

A clear process will be vital for working with the Welsh Government, National Advisers, devolved public sector, specialist sector and survivors in Wales. The relationship between the commissioner role and the National Adviser role needs to be set out from the beginning so that their roles in monitoring and providing guidance to the public sector and government are complimentary across devolved and non-devolved agendas. This will be particularly critical in the role the commissioner has in overseeing the quality assurance process for Domestic Homicide Reviews (DHR). The will need to work together with stakeholders across Wales and provide a mechanism for shared learning from DHRs to facilitate the learning on an England and Wales wide level.

The commissioner must facilitate the amplification of survivor voices and specialist services in Wales rather than act as a barrier to our participation of our unique landscape of provision through acquiring our representation.



Recommendations:

1. The role of the commissioner should clearly outline how they will facilitate survivor and specialist sector engagement, particularly from Wales.
2. Outline the statutory powers that the role will have to monitor statutory agencies and compel them to engage with their work and take on their recommendations, including clearly stating how the role will function in Wales in the devolved setting.
3. Establish a clear outline of a transparent recruitment process that will enable the appointment of a person with sufficient expertise in VAWG to the role.
4. Necessary resourcing of the role in line with the scale of VAWG in the UK to provide an appropriate budget and team to deliver a meaningful programme of work.
5. An outline of regular meetings with all relevant Secretaries of States, including attendance at the inter-Ministerial group meeting on VAWG, all relevant UK government civil servants and with the National Advisers for Wales and where relevant, Welsh Government Ministers and officials.
6. A requirement for the role to maintain an open relationship with VAWG umbrella bodies and the wider VAWG sector, including regular meetings and ensuring VAWG sector members and survivors from Wales have a role in any relevant working groups or boards created by the commissioner.

4. Ratification and implementation of the Istanbul Convention

The proposed legislation and the non-legislative agenda should set out the ratification and the full implementation of the Istanbul Convention obligations including standards on prevention intervention, statutory minimum levels of specialist support for survivors and effective perpetrator interventions to hold them to account. The convention establishes legal frameworks for the protection and support of survivors, punishment of perpetrators and to prevent and eradicate all forms of violence against women setting out minimum levels of provision. Member states are required to establish a comprehensive and coordinated policy addressing all forms of violence covered by the Istanbul Convention and offering a holistic response to violence against women. The consultation sets out the UK government's steps to ensure it complies in regards to extraterritorial jurisdiction, which we support, however the legislation should look at how the government will comply with all aspects of the convention.

Recommendations:

1. The legislation and non-legislative programme set out measures to address complying with the Istanbul Convention in full.

5. Equal access to support and resources for all survivors including migrant women

The legislation must ensure the current VAWG strategy commitment to turn no woman away, including improved provision for women with 'no recourse to public funds'. We are deeply concerned that the current system does not enable migrant survivors with insecure immigration status to access safety and support, particularly refuge provision. Last year in Wales 78 survivors were referred to



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refuge based support in Wales who, because of their insecure immigration status, had 'no recourse to public funds' so their places were unable to be funded.⁵

There needs to be improvements in statutory agencies, in particular immigration services (including those privately contracted by government) in recognising the use of a person's immigration status as a method of control and abuse. Immigration officers and other relevant professionals need to be fully trained to identify all forms of abuse and to respond in the best interest of the person being abused. They must put the protection and support of the survivor over immigration enforcement, without doing so creates a barrier for people with insecure immigration status to disclosing abuse and could make the state complicit in the perpetrators methods of coercion and control.

Recommendations:

1. An extension on the time limits on Destitution Domestic Violence Concession (DDVC) to the length of time it takes to conclude a case or at least to a timeframe of six months.
2. Enable the eligibility of survivors of domestic abuse for a fast track application for indefinite leave to remain regardless of marital or relationship status.
3. Extend DDVC to ensure all survivors with insecure immigration status can access DDVC and, therefore, access safe accommodation and refuge spaces.
4. Ensure the legislative and non-legislative programme enables improvement in provision and support for all survivors, this should include ensuring access to adequate support and financial assistance for survivors with insecure status that does not burden specialist services or the survivor with the cost.
5. Ensure public bodies, particularly the police, Crown Prosecution Service (CPS) and courts are specifically instructed of their duty to protect survivors of abuse and to pursue to adopt a non-punishment principle towards survivors ahead of immigration enforcement.

6. Reformed welfare system that supports survivors to be free from abuse

With the recognitions of economic abuse in the proposed statutory definition and the duty to make domestic abuse everyone's business it is vital that the impact of welfare policy on survivors is recognised and addressed. Access to financial assistance and support through welfare benefits is vital for survivors.

Financial abuse does not occur in isolation, 82% of survivors of financial abuse report experiencing other forms of abuse.⁶ In Wales, almost a third of survivors accessing specialist services reported experiencing financial abuse.⁷ Survivors in Wales raised the significant barriers financial abuse has caused in terms of leaving a relationship and the significant anxiety and impact it has on their ability to survive and stay safe. Survivors reported experiencing ongoing financial burdens post relationship including repaying debt, negative equity and problems in accessing welfare benefits to support them.

⁵ Welsh Women's Aid, 'Summary of 2016/17 Data from Specialist Services in Wales', 2017.

⁶ 'Money matters: Research into the extent and nature of financial abuse within intimate relationships in the UK' 2015, written for the Co-Operative Bank and Refuge by Nicola Sharp-Jeffs

⁷ Welsh Women's Aid, 'Summary of 2016/17 Data from Specialist Services in Wales', 2017.



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Welfare policy reforms, including the introduction of universal credit, child tax credit limitations and reduced access to housing benefit have left survivors without adequate access to money for housing, transport, food and basic essentials during and after leaving an abusive relationship. These range of welfare reform policies risk increasing financial barriers survivors face in leaving abusive relationships, increase the control abusers have enabling financial or economic abuse and inhibit survivor's ability to build safe and independent futures. Survivors reported that perpetrators 'work the system' to perpetuate their control.

Recommendations

1. A statutory review and publication of a report of the impact of current welfare reforms to assess whether they are creating a barrier to women being able to have long term freedom from abuse, this should be published with recommendations of addressing barriers in partnership with the VAWG sector.
2. Reversal of the two child tax credit limit as it fails to recognise the complexities in which a third child may be conceived and inexplicably discriminates against women, putting a financial burden on them and their children if their financial circumstances change.
3. Recognition that the exemption on the grounds of rape and coercive control is fundamentally unworkable and at odds with principles enshrined in human rights legislation and should lead to the reversal of the two child tax credit limit.
4. Universal credit payments should be provided individually rather than to a single householder as default. The current system can enable financial abuse and the split payments system could unintentionally exacerbate domestic abuse.
5. Access to dual housing benefit for up to 12 months (even if they are not intending to return home) for survivors of domestic abuse who are forced to flee their homes.
6. Survivors fleeing domestic abuse should be exempt from repayments of benefit advances under universal credit.

7. Improvements to the Family Courts system and wider court system

The legislation should improve the support for survivors across all court systems and ensure that there is join up in decision making in family, civil and criminal courts. The support for survivors across the court system should include an assumption for all survivors to be provided with special measures, aligned to advocacy support for survivors to accompany them to all court proceedings and an insurance that they will not be cross examined by their perpetrator.

It needs to be recognised that family courts are often used and manipulated by perpetrators of domestic abuse as an avenue to further control, coerce and abuse their victims. Survivors have reported how the family justice system services can prolong and reinforce the abuse they had experienced by perpetrators. They reported that perpetrators are using child contact as a mechanism of ongoing control and that this was either not understood or ignored by the court and related agencies.⁸ This is often in contradiction to social services raising contact as a child protection and

⁸ Y. Rehman, 'Are you listening and am I being heard? Survivor Consultation: A report of the recommendations made by survivors of violence against women, domestic abuse and sexual violence, to inform the National Strategy in Wales', Welsh Women's Aid, 2016,



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welfare concern and advising survivors that they should not allow contact. This places survivors in the predicament of going against family court contact orders or being held accountable by social services for allowing unsafe contact.

Perpetrators are also capitalising on the opportunity of cross-examining victims as a method of continuing their abuse, and preventing survivors from safely being able to access justice after the relationships has ended. The UK government has committed to prohibit perpetrators from cross-examining victims in the family and criminal justice systems through new legislation. This legislation should be laid as soon as possible either in the Domestic Abuse Bill, or the Courts Bill.

Recommendations:

1. Bring forward legislation that bans the cross examination of survivors by their abusive ex-partners across family courts, ensuring parity with criminal courts.
2. Ensure all professionals in family courts and involved in child arrangement applications for contact/residence receive adequate training on domestic and sexual abuse, particularly coercive controlling behaviour and its impact on the survivor and their children.
3. Guarantee special measures are available and offered for all survivors, including separate entrances and waiting areas, screens and video links and ensure they are provided in consultation with the survivor across family and criminal courts.
4. Ensure the provision of advocacy support for survivors before, during and after all family court proceedings.
5. Improve links between family and criminal courts to ensure that there is consistency in approach to information sharing focused on the safety of the survivor and their children.
6. Ensure the prohibition of unsupervised contact where a case is awaiting trial, on bail or there are ongoing criminal proceedings for domestic or sexual abuse.
7. Provide clarity on the assumption of shared parenting when children are at risk of harm from domestic or sexual abuse.
 - Ensure child arrangement orders for contact/residence are decided on an informed judgement of what's in the best interests of the child(ren) and that unsafe and unsupervised contact is not ordered, either in final hearing or interim, where there is an ongoing risk of harm to children and their non-abusive parent due to domestic or sexual abuse.
 - Monitor the use and delivery of expert safety and risk assessments in child contact cases, increase the availability of child contact centres offering supervised contact, and ensure greater consistency in the use of supported or supervised contact. This includes ensuring parity between Wales and England so that family courts in Wales can also require, via Cafcass Cymru, a perpetrator of domestic abuse to attend a domestic abuse perpetrator programme as part of a 'court ordered activity' in private law cases concerning Child Arrangements Applications.
8. Remove the capital means test, which treats the equity in homes as funds available towards legal costs, from the eligibility process for legal aid to ensure survivors are able to access justice.
9. Provide the power to dismiss vexatious applications or continual applications being made by the same individual where it is clear the purpose is to harass or distress the survivor or children.



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8. Protection Orders

We support the revision of the current Domestic Violence Protection Orders which are being used to varying degrees across Welsh police forces. There are concerns that the cost of orders is inhibiting their use where police forces are attempting to manage lower budgets. This will have implications for other agencies with the expansion of who can apply for orders. The process must not see agencies passing the buck on who will apply for the order and, therefore, take on the cost. This will be particularly concerning for specialist services that already have limited funding. Specialist services are often best situated to apply for an order in consultation with the survivor however if they are to be given the capability to apply for orders they will need to be resourced to do so both for the cost of the order and the capacity to do so.

Any revised protection order system must (1) have the survivor's consent and support at its heart (2) proactively prevent further perpetration and hold the perpetrator to account for their actions. The current proposals remove the survivor from the decision making process in applying for the order, opening up the possibility that an order or notice could be imposed on a survivor without her wishing for it. Applying for an order must be done as part of strengths-based, needs-led support for a survivor and aligned to advocacy support. Additionally the monitoring of the compliance with the orders/notices often falls to the survivor, it is critical that there is sufficient resourcing to make sure that the monitoring of compliance is focused on the perpetrator and their actions. As part of this we welcome proposal to make a breach of an order an arrestable offence.

Recommendations:

1. Survivor consent to orders and notices is sought as part of the process.
2. The provision of protection orders should be aligned to advocacy and other specialist support for survivors.
3. Monitoring of compliance should be sufficiently resourced to ensure that it does not fall to the survivor to monitor.
4. There needs to be sufficient resourcing of agencies that can apply for orders.

9. Resource and Funding

The impact of any reforms will be limited without sufficient resources being allocated to enable public services and specialist services in the third sector to effectively implement these reforms. To ensure no victim is turned away from life-saving support, it is vital that we see parallel action by Westminster and Welsh Government to sustainably fund domestic abuse refuges and community outreach services, sexual violence services and specialist support for migrant women.

The impacts of austerity measures on statutory and generic service provision such as mental health, substance misuse, and sexual health services are impacting on survivors' access to relevant and timely support. This has led to reports from specialist services that they are picking up additional and often complex support needs caused by gaps in public services.⁹ Last year 500 survivors in Wales were

⁹ Welsh Women's Aid, State of the Sector, December 2017



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unable to be supported in refuge because of a lack of service resources or capacity.¹⁰ The turn-away rate highlights that resourcing of specialist services is already not insufficient to meet demand.

Uncertainties of funding in the long term include the UK Government proposed reforms to funding for short term supported housing, which they have announced will be devolved to the Welsh Government, who will determine the model of funding for Wales for implementation from April 2020 onwards. The UK Government will provide the Welsh Government with the level of funding in 2020/21 equivalent to that which would otherwise have been available through the welfare system. This raises significant concerns that the funding will be set at current projections and not be flexible to actual need. Specialist services, in the last year alone, have suffered the loss of 30% of funding from Housing and Homeless prevention grants from local authorities in Wales.¹¹ Housing benefit covering housing costs has provided critical stability for refuges in the continued challenging funding landscape of competitive commissioning and reductions in other funding streams. The removal of the link to individual benefit entitlements to commissioning through competitive tenders and grants means that this consistency and flexibility in funding need will be lost. These changes are set to have a catastrophic impact on the future of refuge provision which underpins the national response to domestic abuse.

The legislation and non-legislation programme success currently risks being significantly undermined by the lack of a model for sustainable funding for the specialist services in the third sector to carry out and support much of the activity proposed. This is a particular concern in regards to the proposed reforms to funding for short term supported housing, which includes refuges.

Recommendations:

1. The legislation includes a clear commitment to resource the implementation of the proposed reforms that includes a model for sustainable funding for all VAWG specialist services.
2. As part of the above recommendation, the proposed reforms for 'short term' Supported Housing funding should not include refuge and move on provision, and in partnership with specialist services, there should be development of a sustainable long-term funding model to support the national network of refuge provision for England and Wales.
3. The UK Government and Welsh Government urgently coordinate parallel action to sustainably fund domestic abuse refuges, sexual violence services, specialist support for migrant women and wider VAWG provision, in accordance with existing Strategy commitments.

Conclusion

Thank you for this opportunity to contribute the views and experience of our organisation to inform this important proposed legislation.

If you require any further information or evidence, please do not hesitate to contact Gwendolyn Sterk, Public Affairs Manager Tel: 02920 541 551 Email: gwendolynsterk@welshwomensaid.org.uk

¹⁰ Welsh Women's Aid, State of the Sector Report 2017, December 2017

¹¹ Welsh Women's Aid, State of the Sector Report 2017, December 2017



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Cymorth i Ferched Cymru
Welsh Women's Aid

Rhoi Merched a Phlant yn Gyntaf
Putting Women & Children First

ⁱ Our membership of 23 third sector violence against women, domestic abuse and sexual violence specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated includes: Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Clwyd Alyn Housing Association (CAHA) Women's Aid, Stepping Stones, New Pathways, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU) North Wales, Gorwel (Grwp Cynefin), Montgomeryshire Family Crisis Centre, Newport Women's Aid, North Denbighshire Domestic Abuse Service, Port Talbot & Afan Women's Aid, RCT Women's Aid, Safer Wales (including Dyn Project), Swansea Women's Aid, Threshold (formerly Llanelli Women's Aid), West Wales Domestic Abuse Service and Rape and Sexual Abuse Support Centre (RASASC) North Wales.