



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

### **CONSULTATION FORM**

#### **Welsh Government**

#### **How to measure a nation's progress**

#### **Proposals for National Well-being Indicators to measure the seven well-being goals in the Well-being of Future Generations (Wales) Act 2015**

Please submit your comments by 11 January 2015

If you have any queries on this consultation, please email:

[FGActWales@wales.gsi.gov.uk](mailto:FGActWales@wales.gsi.gov.uk) or telephone: 029 2082 5259 or 3388.

#### **Data Protection**

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have



asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

### Confidentiality

Responses to consultations may be made public on the internet or in a report.

**If you do not want your name and address to be shown on any documents we produce please indicate here**

## 1 Response Form

How to measure a nation?	
<b>Name</b>	Karan Sanghera
<b>Organisation</b>	Welsh Women's Aid
<b>Address</b>	Pendragon House Caxton Pentwyn CF23 8XE
<b>E-mail address</b>	karansanghera@welshwomensaid.org.uk
<b>Telephone</b>	02920541551
<b>Type</b> <i>(please select one from the following)</i>	Individuals <input type="checkbox"/>
	Public Body (Local Authority, Local Health Board, Fire and Rescue Authority etc) <input type="checkbox"/>
	Businesses <input type="checkbox"/>
	Professional Bodies/Interest Groups <input type="checkbox"/>



	Third sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	X
	Other (other groups not listed above)	<input type="checkbox"/>

### Question 1

**Do you agree or disagree that the proposed set of indicators, as a whole, fully assess whether progress is being made in achieving all the well-being goals?**

1.1 Welsh Women's Aid is broadly in agreement with the indicators. We are pleased that many indicators measure factors which impact those who have experienced or are experiencing domestic abuse, sexual violence or other forms of violence against women.

However we *would strongly recommend an additional two indicators on violence against women be added to the suite of indicators, and that these be framed within a human rights context.* This is a key Welsh Government priority - to prevent violence against women and protect and support survivors - but it is very disappointing that this is not reflected in this crucial suite of indicators to measure the success of the cross-cutting well-being goals.

For example, indicators could include:

- *Levels of domestic abuse, sexual violence and violence against women in Wales, in order to measure the effectiveness of primary, secondary and tertiary prevention over time and*
- *Levels of independent service provision for domestic abuse and sexual violence, available per head of population; including helplines, refuges, rape crisis centres, perpetrator programmes, advocacy and counselling.*

This would cut across the 7 well-being goals, but in particular (1), (2), (3), (4) (5) and (7).

### Question 2

**Are there any indicators proposed that you think can be improved?**

**We would suggest that you consider the criteria identified in Section 2 of the Consultation Document when proposing an improvement.**

2.1 The extent to which the seven wellbeing goals are being met can only be truly determined if all relevant adopted indicators also include a gender analysis. Gender analysis will measure the extent to which women and men's lives are being improved by the wellbeing goals, and also will highlight underlying inequalities which may be hindering improvement in certain areas.

2.2 The UN has recommended:



*'Governments...to incorporate gender perspectives into their national policies, action plans and other measures on sustainable development and climate change, through carrying out systematic gender analysis<sup>1</sup>;*

2.3. Evidence shows that tackling violence against women and promoting equality between men and women will have a positive impact on all of the seven wellbeing goals outlined in the Act:

- An equal Wales: sex inequality is a root cause of violence against women<sup>2</sup>. Tackling violence against women, including its causes, will lead to more equality between men and women in Wales;
- A healthy Wales: the World Health Organisation has stated that violence against women is a 'global health problem of epidemic proportions'<sup>3</sup>. By adopting practices to eliminate all forms of violence against women, Wales will see a positive increase to the nations' physical and mental health, reduction in problematic substance use as well as improved resilience and recovery from trauma associated with violence against women and adverse childhood experiences;
- A prosperous Wales: domestic violence 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<sup>4</sup>. In addition, women 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 abuse<sup>5</sup>. By incorporating approaches to prevent violence against women, Wales will be more prosperous both 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 and cohesive communities are interlinked areas, given the level of involvement that the criminal justice system has in both. Tackling violence against women will lead to safer communities, and more trust between neighbours. In addition, violence against women can result in the further social exclusion of already marginalised minority groups, for example Black and minority communities and lesbian, gay, bisexual and transgender (LGBT+) communities. Tackling violence against women will break stereotypes and challenge social stigma, which will promote inclusiveness and better community ties;
- A resilient Wales: a more equal Wales will arguably lead to a nation which allows the full participation of women in all aspects of public and private life. Therefore, more of the population will be able to contribute to the resilience of the natural environment.
- Vibrant culture and Welsh language: a more equal Wales which fully involves women in its cultural life and reflects their lives will be of benefit to all;
- A globally responsive Wales: violence against women is a worldwide issue, and many legal instruments have been produced to protect the human rights of the women adversely affected by these issues. By Wales utilising the recommendations in these

---

<sup>1</sup> UN WomenWatch: Fact Sheet Women, Gender Equality and Climate Change:

[http://www.un.org/womenwatch/feature/climate\\_change/downloads/Women\\_and\\_Climate\\_Change\\_Factsheet.pdf](http://www.un.org/womenwatch/feature/climate_change/downloads/Women_and_Climate_Change_Factsheet.pdf)

<sup>2</sup>UN Women: virtual knowledge centre to end violence against women and girls, accessed November 2015:

<http://www.endvawnow.org/en/articles/300-causes-protective-and-risk-factors-.html>

<sup>3</sup> World Health Organisation Media Centre, accessed November 2015:

[http://www.who.int/mediacentre/news/releases/2013/violence\\_against\\_women\\_20130620/en/](http://www.who.int/mediacentre/news/releases/2013/violence_against_women_20130620/en/)

<sup>4</sup> Walby, S., The Cost of Domestic Violence: Update 2009.

<sup>5</sup> Povey, E., Coleman, K., Kaiza, P., Hoare, C., Jansson, K., (2008) Home Office Statistical Bulletin: Crime in England and Wales 2006/07. Supplementary Volume 2 to Crime in England and Wales 2006/07



instruments (e.g. fulfilling requirements of the Istanbul Convention), Wales will be globally responsive and at the forefront of developing good practice in this area.

2.4 It has been well documented that violence against women and women's lack of equality adversely impacts our health care<sup>6</sup>, the criminal justice system<sup>7</sup>, poverty<sup>8</sup>, employment<sup>9</sup>, and education<sup>10</sup>, amongst many other areas of society. Even seemingly separate issues can also have an impact on, and be impacted by, violence against women, for example, climate change.

2.5 UN Women say:

*"Linking gender equality with sustainable development is important for several reasons. It is a moral and ethical imperative... To be effective, policy actions for sustainability must redress the disproportionate impact on women and girls of economic, social and environmental shocks and stresses. Failure to capitalize on [women's knowledge, agency and collective action] would be a missed opportunity. Women should not be viewed as victims, but as central actors in moving towards sustainability"<sup>11</sup>.*

2.6 As such, having a gender analysis for each indicator will allow data to be collated to compare who is benefiting from the Act's wellbeing goals, and where improvements are yet to be made.

2.7 In addition, the Special Rapporteur on violence against women stated that, "*gender analysis and social research thus complement indicators and provide explanatory frameworks*"<sup>12</sup>. Welsh Women's Aid recommend that gender analysis is included in the data gathered by each indicator.

2.8 As explained above, Welsh Women's Aid would recommend improvement of all the indicators by including a gender analysis to highlight areas of inequality. An addition, we would recommend further improvements for indicator (4) **Young people developing the right skills** and (5) **School leavers with skills and qualifications**. Both of these indicators should measure how many young people are receiving healthy relationship education. Welsh Women's Aid would encourage violence against women, domestic abuse and

---

<sup>6</sup> World Health Organisation: Violence against women Health consequences, accessed November 2016: <http://www.who.int/gender/violence/v8.pdf>

<sup>7</sup> Equality and Diversity Impact Assessment on the CPS Violence Against Women Strategy and Action Plan [https://www.cps.gov.uk/publications/equality/vaw/vaw\\_eia.html](https://www.cps.gov.uk/publications/equality/vaw/vaw_eia.html)

<sup>8</sup> Bevan Foundation for the Women Equality Network Wales. (Women's Equality Now: The Position in Wales Today on Poverty and Economic Violence. Accessed: <http://www.wenwales.org.uk/wp-content/uploads/6033-WEN-Econ-Violence-FINAL.pdf>

<sup>9</sup> Povey, E., Coleman, K., Kaiza, P., Hoare, C., Jansson, K., (2008) Home Office Statistical Bulletin: Crime in England and Wales 2006/07. Supplementary Volume 2 to Crime in England and Wales 2006/07.

<sup>10</sup> Phipps, A and Smith, G (2012) 'Violence against women students in the UK: time to take action', in Gender and Education 24(4), 357-373.

<sup>11</sup> World Survey on the Role of Women in Development 2014: Gender Equality and Sustainable Development, UN Women, 2014, p.7.

<sup>12</sup> Ertürk, Y., (2008) Report of the Special Rapporteur on violence against women, its causes and consequences: Indicators on violence against women and State response



sexual violence prevention work via the provision of a whole school approach to healthy relationship education being delivered in schools in Wales. It is often the case that young people, as a whole, do not understand the difference between healthy and unhealthy relationships. By measuring how many children and young people are receiving or have received this education, cross referenced with over data (such as prevalence data in certain ages), we will be able to determine how many children and young people have developed health relationship attitudes.

### **Question 3**

**Are there any indicators proposed that you think should be excluded?**

**We would suggest that you consider the criteria identified in Section 2 when proposing the deletion of an indicator.**

3.1 Welsh Women's Aid appreciate that a wide range of indicators are needed to measure progress under the Act. We would however welcome alignment with other national outcomes and indicator frameworks, e.g. such as those being developed for delivery of the Violence Against Women Domestic Abuse and Sexual Violence (Wales) Act 2015.

### **Question 4**

**Are there any other indicators that you think should be included?**

4.1 Welsh Women's Aid recommends the inclusion of a specific indicator which measures Wales' progress in preventing domestic abuse, sexual violence and other forms of violence against women. An additional two indicators on violence against women should be added to the suite of indicators, and these should be framed within a human rights context.

4.2 Welsh Women's Aid could provide further guidance on how this indicator can be developed and adopted, for example:

- *Levels of domestic abuse, sexual violence and violence against women in Wales, in order to measure the effectiveness of primary, secondary and tertiary prevention over time and*
- *Levels of independent service provision for domestic abuse and sexual violence, available per head of population, including helplines, refuges, rape crisis centres, perpetrator programmes, advocacy and counselling.*

This would cut across the 7 well-being goals, but in particular (1), (2), (3), (4) (5) and (7).

### **Question 5**

**How do you think we should communicate the national well-being indicators with the people of Wales?**

5.1 Welsh Women's Aid does not have any further comments for this question.

### **Question 6**



**Do you agree with the proposed approach for measuring the people making healthy lifestyle choices indicator?**

6.1 Welsh Women's Aid does not have any further comments for this question.

**Question 7**

**Do you think that a similar indicator for children making healthy lifestyle choices should be included?**

7.1 Yes. Inclusion of an indicator which focuses on children's health will enable focus and highlight the issues faced by children in their own right as required under the United Nations Convention on the Rights of the Child (UNCRC). Measurement of this indicator must result in analysis as to why healthy life style choices are not being made. For example, are issues at home, such as domestic abuse, sexual violence, child sexual abuse or exploitation preventing access to healthy lifestyles?

**Question 8**

**Do you agree with the proposal to measure homes free from hazards as an indicator of housing quality?**

8.1 Welsh Women's Aid recommends that this measure should be expanded to also include the provision of suitable housing, as this is surely a measure of the overall quality of housing available in Wales. For example, the accessibility to suitable accommodation for women seeking refuge or move on accommodation in Wales. This not only contributes to this indicator but will also contribute to other wellbeing measures, such as 'People feeling safe in their communities'.

**Question 9**

**Do you think that the indicator should measure households deemed to be homeless rather than those prevented from being made homeless?**

9.1 Welsh Women's Aid agrees that the indicator should measure households deemed to be homeless rather than those prevented from being made homeless. This will allow measurement of the extent to which homelessness is present in Wales.

However homelessness is often hidden, and this type of homeless should also be measured, given this disproportionately impacts on women.

9.2 Crisis describes 'hidden homelessness' as

"The Government's headline homelessness statistics are focused on those owed the main homelessness duty and entitled to accommodation. However, the vast majority of homeless people exist out of sight in bed and breakfasts, squats, on the floors or sofas of friends and families or sleeping rough. This means that they are all too often



invisible to the public and so, despite meeting the legal definition of homelessness, are often not regarded as a priority for decision makers.<sup>13</sup>

### **Question 10**

**What type of art, culture and heritage activities do you think should be measured in relation to this indicator?**

10.1 Welsh Women's Aid would like to see indicators that relate to the extent to which arts and culture address violence against women prevention in their delivery at a regional and national level.

### **Question 11**

**Do you agree that we should focus on those that actually use Welsh on a regular basis rather than on those that can speak the language?**

11.1 Welsh Women's Aid does not have any further comments for this question.

### **Question 12**

**Which approach should be used to measure greenhouse gas emissions?**

- A. Emissions from what we produce in Wales.**  
*Measured by : Production based inventory, measured in MtCO2.*
- B. Emissions from what we consume in Wales.**  
*Measured by: Consumption end user based inventory, on a UK only basis, measured in MtCO2.*
- C. A carbon footprint indicator where emissions that are produced in Wales (A) are considered along with the embedded emissions associated with the consumption (by residents in Wales) of goods and services imported internationally.**

12.1 Welsh Women's Aid does not have any further comments for this question.

### **Question 13**

**Do you have a suggestion for how we measure the health of our ecosystems?**

13.1 Welsh Women's Aid does not have any further comments for this question.

### **Question 14**

**Do you have a suggestion for how we measure the variety and abundance of the biodiversity of our natural environment?**

14.1 Welsh Women's Aid does not have any further comments for this question.

---

<sup>13</sup> <http://www.crisis.org.uk/pages/about-hidden-homelessness.html>



## **Question 15**

### **Do you think the proposed water quality indicator sufficiently measures the benefits of the water environment?**

15.1 Welsh Women's Aid does not have any further comments for this question.

## **Question 16**

### **What types of international activities or forms of engagement should be included within this indicator?**

16.1 Violence against women and girls is the most widespread form of abuse worldwide, affecting one third of all women in their lifetime. For example, one in three women across the world have experienced physical or sexual violence (the majority of the perpetrators being an intimate partner)<sup>14</sup>. This figure does not include women who are effected by other types of violence against women, for example, forced marriage and female genital mutilation. The World Health Organisation (WHO) have described violence against women to be "major public health problems and violations of women's human rights"<sup>15</sup>.

16.2 Given the impact that violence against women has across the world, Welsh Women's Aid recommends that the proposed indicator should include and measure engagement and activities within the context of violence against women globally. This could include engagement with human rights bodies about women's rights, and also taking part in international awareness days, such as the UN's International Day of Elimination of Violence Against Women.

## **Question 17**

### **What are your views on the proposal to provide a narrative explanation on how Wales contributes to international obligations instead of a specific measurement?**

17.1 Welsh Women's Aid recommends that this indicator should be adopted, and furthermore, the narrative should include details as to how Wales is meeting its obligations under Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), the Council of Europe's Convention on Preventing and Combating Violence against Women and Domestic Violence (the Istanbul Convention)<sup>16</sup> and the United Nations Convention on the Rights of the Child (UNCRC).

17.2 CEDAW outlines how women are adversely discriminated against and how member states can put in place measures to eliminate this discrimination<sup>17</sup>. The Istanbul convention calls for member states to recognise and act on violence against women fully in order to

---

<sup>14</sup> <http://www.unwomen.org/en/what-we-do/ending-violence-against-women/facts-and-figures>

<sup>15</sup> <http://www.who.int/mediacentre/factsheets/fs239/en/>

<sup>16</sup> Council of Europe Convention on preventing and combating violence against women and domestic violence, accessed November 2015: <http://www.coe.int/en/web/conventions/full-list/-/conventions/rms/090000168008482e>

<sup>17</sup> Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), accessed November 2015: <http://www.un.org/womenwatch/daw/cedaw/cedaw.htm>



prevent this violence from occurring, protect victims of violence and to prosecute perpetrators<sup>18</sup>. Given the aims of the Act, there is an ideal opportunity for international obligations to be fulfilled and progress to be demonstrated against this indicator.

17.3 Wales, through the Act, is in a position to make real changes for women and children across the nation, and be an example to other countries in the EU and also worldwide. Whilst we appreciate that the Istanbul Convention is yet to be ratified by the UK government (indications from the UK Government however, are that this is imminent), signing the convention in June 2012 shows an intention to commit to the recommendations. Recommendations under the Istanbul convention which align with the wellbeing goals include creating gender sensitive policies, promoting substantive equality between men and women, promoting international co-operation, and education. This is not an exhaustive list, and Welsh Women's Aid would stress the point that tackling violence against women in all forms ultimately ties in with, and supports, all of the wellbeing goals. Wales, by paying regard to the Istanbul Convention will ensure that decision making is forward looking and EU compliant.

17.4 No nation in the UK has yet reached the minimum standards set by the Council of Europe with regard to tackling Violence against Women under CEDAW. For example, the UK does not have a national strategy for implementing CEDAW; the convention has rarely been mentioned in consultations, legislation and policies (including the Equality Act 2010), and the UK are yet to nominate a representative to sit on the CEDAW Committee. These standards, plus many more, all of which seek to eliminate violence against women, have been further embedded in the Istanbul Convention, emphasising the importance of achieving them. If the duties in both CEDAW and the Istanbul Convention were monitored and measured under this indicator, Wales will be utilising a great opportunity not only to improve the lives of women and girls across the nation, but also demonstrate how it is achieving all of the wellbeing goals.

17.5 UNCRC includes a series of Articles which emphasise the role of Governments to protect children's rights including in the context of violence against women and the responsibility to support parents to protect their children. These obligations should also be measured using this indicator.

## Question 18

**Any Other Comments: If you have any other comments or issues to raise, please record them in the space provided**

18.1 Welsh Women's Aid are mindful that other legislation that has been passed this year also will have indicators developed in the near future, specifically the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, and the Social Services and Wellbeing Act (Wales) Act 2014. There is a real possibility that there will be an overlap in indicators and due care must be paid to ensure these are relevant yet avoid unnecessary duplication.

---

<sup>18</sup> <http://www.coe.int/en/web/istanbul-convention/about-the-convention>



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

Rhoi Merched a Phlant yn Gyntaf  
Putting Women & Children First

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

**Karan Sanghera – Policy Officer**  
**02920 541 551**

**[karansanghera@welshwomensaid.org.uk](mailto:karansanghera@welshwomensaid.org.uk)**