



Cymorth i Ferched Cymru Welsh Women's Aid

Rhoi Merched a Phlant yn Gyntaf
Putting Women & Children First

Submission to the National Assembly for Wales Finance Committee scrutiny of the draft 2016-17 Wales budget

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These are the views of:	<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>

Introduction

Welsh Women's Aid is the national charity in Wales working to prevent domestic abuse and all forms of violence against women¹ and ensure high-quality services for survivors that are needs-led, gender-responsive and holistic.

Established in 1978, we are an umbrella organisation that represents and supports a national federation of 24 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 groupwork in every local authority in Wales.

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

Key recommendation:

- 1. Welsh Government commits to protecting the funding for independent specialist domestic abuse and sexual violence services in Wales in 2016/17; and to establishing sufficient resources and a sustainable funding model for these specialist services in future.***

¹ Domestic abuse is the exercise of control by one person, over another, within an intimate or close family relationship; the abuse can be sexual, physical, financial, emotional or psychological. Violence against women is violence directed at women because they are women or that affects women disproportionately, and includes domestic abuse, rape and sexual violence, forced marriage, female genital mutilation, sexual exploitation including through trafficking and the sex-industry, so-called 'honour-based violence' and sexual harassment .

Summary of additional recommendations:

2. *Ministers should ensure NHS and social care investment enables these agencies to play a greater role in the prevention of domestic abuse, sexual violence and other forms of violence against women. This should include funding arrangements in 2016 which support Public Health Wales and the Health Boards and Trusts in Wales to:*
 - a. *Commit to delivering a public health approach to preventing domestic abuse, sexual violence and other forms of violence against women.*
 - b. *Commission the IRIS programme for health services and independent (third sector) specialist services, to ensure national delivery.*
 - c. *Implement violence against women guidance and NICE Domestic Violence and Abuse Guidelines (PH50 2014).*
3. *Welsh Government should promote the business case for violence against women prevention amongst all providers/contractors in receipt of Government investment, requiring them to:*
 - a. *Ensure they demonstrate corporate social responsibility by creating workplace policies, and training and educating employees on domestic and sexual abuse.*
 - b. *Promote and/or provide access to support for victims, and take action against perpetrators.*
 - c. *Exert leadership in local communities by supporting specialist services and promoting preventative campaigns and equality between women and men.*
4. *Welsh Government should ensure budgets also prioritise the sustainability of the third sector (as well as the public sector), and investment should also be targeted at systems change and transformation (as well as public services innovation).*
5. *Welsh Government should ensure budgets support delivery of multi-agency statutory guidance that delivers systems-change and ‘change that lasts’; prioritising needs-led strengths-based delivery that places survivors of abuse at the centre of any intervention.*
6. *Welsh Government should ensure budgetary investment targeted at reducing poverty and mitigating welfare reform proactively addresses violence against women prevention and the negative impacts these have on women and children.*
7. *Welsh Government should ensure budgets deliver sufficient specialist women’s refuge spaces in Wales to meet the needs of women and children and a national network of independent specialist women’s services to support women and children to achieve independence and freedom from abuse.*

Response to consultation questions:

1. **What, in your opinion, has been the impact of the Welsh Government’s 2015-16 budget?**
 - 1.1 Having worked for nearly four decades in Wales to prevent domestic abuse and all forms of violence against women, we are pleased that budgetary investment in 2015-16 contributed towards strengthening the legislative and policy framework on violence against women prevention in Wales. The enactment of the Violence Against Women Domestic Abuse and Sexual Violence (Wales) Act 2015 was accompanied by **investment in various work-streams** including, but not limited to:

- The Live Fear Free Helpline for sexual abuse and domestic abuse victims (women, men, children and young people). Welsh Women's Aid successfully bid for the contract to deliver this service, which runs over the next 5 years.
- The National Training Framework development, which includes delivery of the national 'ask and act' train-the-trainers programme for regional trainers to cascade this to public services. This 5 year training contract was awarded to Welsh Women's Aid national training service partnership, in December.
- The development of a suite of statutory guidance to inform implementation of the Act; currently being consulted on.
- Local domestic abuse coordinators and a national Ministerial Advisor position.
- *Supporting People* funding which continues to support refuge services and associated domestic abuse floating support provision in many areas across Wales, and which in some areas is supplemented by other local government grants.

1.2 The 2015-2016 budget(s) for violence against women, domestic abuse and sexual violence **also resulted in cuts to provision**, including to our own national services.

- In 2015/16, the Welsh Women's Aid *Children Matter* project, funded by Welsh Government within our core grant, was cut by 25% with the expectation that this could be picked by regional pathfinder commissioning processes. This did not happen and resulted in a restructure of the project, reduced capacity, and less local specialist services were able to deliver groupwork for children and young people affected by abuse.
- In 2015/16, our two directly-managed services were subject to a 10% cut in *Supporting People* grant; this followed previous funding cuts in North Wales.

1.3 Amongst our national membership of domestic abuse/violence against women services, the vast majority also bore the brunt of public authority cuts to their frontline services this year, ranging from 3%, 5%, 15%, 20% and in some cases 50-70% cuts to some funding streams. The impact of losing this funding was compounded for some services by the successive cuts – 25 to 35% - experienced over the last 3 years. Amidst these cuts, demand for support increases:

- In 2014-15, over 10,000 adult survivors were supported by specialist services and **at least 284 women in Wales could not be accommodated by refuges because there was no space available when they needed help.**
- In the first 6 months of this year, nearly 6,000 survivors were supported, **and 161 women in Wales could not be accommodated by refuges because there was no space available when they needed help.**

1.4 The vast majority of these specialist services across Wales already operate on shoestring budgets; the impact of these apparently small funding cuts is significant for small specialist providers and for the survivors that depend on them for lifesaving support. Feedback on the impact of in-year cuts from our membership of independent (third sector) providers of specialist domestic abuse refuges and associated support services, includes, for example -

- One service, which has been supporting 12 families in the refuge and local community for several years, only has a small amount of council funding for a domestic abuse support worker, to support children 2 days a week. From April this will be cut to zero. Having already experienced a 15% cut in refuge funding this year, they expect another 10% cut next year and fear closure as a result.
- Another service has 6 part-time staff supporting families accessing multiple refuges, a floating-support service and one-stop shop. Funding cuts this year means they have cut staff hours to the bare minimum, and cover the shortfall by their own dwindling charitable reserves, which cannot continue into next year.

- One service has experienced a 30% cut in their housing grant, which supplements their *Supporting People* provision, and will lose this funding from April despite receiving a 150% increase in referrals.
- Another service experienced a 3% cut in funds, which had a significant impact on its staffing and service model, which comprises 11 families and their children being supported by 3 part-time staff. Rather than cut services, these support workers continue to provide support to help women resettle in the community, but this work is now unfunded. Any further cuts will likely lead to service closure.
- One service receives around £10K from the public sector to support children affected by abuse across all its refuges and community outreach provision; this inadequate funding of children's support is not unusual. Unlike the rest of the UK, specialist services that have established refuges and community outreach provision do not have adequate funding for children's support services in most areas of Wales.
- A service that supports families in rural areas fears that any further cut to its recent 25% cut in funding will mean that families who live in isolated areas will lose access to support. They currently manage this on a voluntary basis; further reductions in funds will make this unsustainable. It costs services more to support families experiencing domestic abuse in rural areas due to travel and more extensive safety-planning work needed.
- Services in urban areas are also struggling. Many services tell us they are only funded by *Supporting People* for the direct contact-time with a client which limits the time they can spend with survivors and the length of support they can offer. This means their supervision and support, administration and monitoring, and other vital back-office functions go unfunded. This false economy also means that survivors are limited in the support they can access to meet their needs, and leads to revolving-door access to service provision.
- A service that experienced 6% cuts this year have been advised to expect a further 20% cut in *Supporting People* from April. They have already reviewed and restructured service models, cut staff salaries to the bare minimum and are not replacing staff when they leave. They told us: '*we have restructured and re-designed the whole organisation to manage the cuts... but we are stretched almost to breaking point*'. Any further loss to their funding will mean parts of their service will close.
- Many services, that for years have provided needs-led support, now fear that cuts to their provision will mean survivors who most need specialist services because of their high-levels of support needs, are those least likely to be able to access help in future. This includes multiple support needs associated with experiencing domestic abuse, mental ill-health and problematic substance use; survivors who have insecure immigration status and/or no recourse to public funds; survivors who have multiple experiences of abuse and need support for its associated trauma; survivors with additional language support needs; young people being abused in their own teenage relationships, and women who have been abused and who are also involved in the criminal justice system.

1.5 **Funding decisions about resourcing specialist services at a local and national level in Wales in 2015-16 was at odds with decisions made in Westminster in 2015-16.** In England, £13.2m was allocated this year by the Treasury to ensure English refuges' capacity was maintained to counteract years of local commissioning which had previously reduced the domestic abuse sector in England. A further allocation of £40 million for services for victims of domestic

abuse was also announced; a tripling of the dedicated funding provided compared to previous years. It was also announced that an additional £15 million a year will be ring-fenced to fund women's health and support charities over the course of the UK Parliament. There has been no equivalent ring-fenced allocation for refuge or other women's services in Wales, and instead of a tripling of funds to specialist provision there has been a year-on-year funding cut for the majority of local specialist services in Wales. It is not yet clear how women's services in Wales can access the designated £15 million a year from 2016.

- 1.6 **Funding decisions about resourcing specialist services at a local and national level in Wales in 2015-16 was also at odds with decisions made at a European level.** The recent *European Directive on Victims' Rights*, from November, includes obligations for states to ensure the provision of specialist services for victims of domestic abuse and other forms of violence against women. Further, the *Council of Europe's Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention)* requires the UK to provide "an adequate geographical distribution [of] immediate, short- and long-term specialist support services to any victim subjected to any of the acts of violence covered by this Convention [including] ... specialist women's support services to all women victims of violence and their children."
- 1.7 **Funding decisions at a national level also appear at odds with local decisions on funding specialist services in Wales.** At the same time as local decisions are being made to reduce the capacity of specialist services, or put services out to tender to replace them with generic provision, Welsh Government funded Welsh Women's Aid to develop several significant pieces of work nationally in 2015-16, including for example:
- Delivery of Welsh Women's Aid National Quality Service Standards, an accreditation framework for specialist services that aligns with other UK frameworks and evidences the quality of local provision. This is currently being piloted and will be rolled-out from 2016.
 - Development of an early intervention and preventative service model to achieve 'change that lasts', which will deliver needs-led, strengths based and trauma informed service models, that places survivors and specialist services at the centre of a community approach to deliver early intervention and prevention. The cost savings to the state of delivering this service model is evident through case studies (see Appendix One).
- 1.8 **Funding decisions at a local level are also at odds with the new legislative framework.** Whilst we welcome national implementation of legislation that introduces a new statutory duty on public authorities to prevent domestic abuse, sexual violence and other forms of violence against women, the Act places increasing responsibility on public authorities to identify and refer survivors to specialist services. It introduces a national framework to encourage more agencies to 'ask and act' and will increase awareness of the need for specialist support. Accompanying forthcoming statutory guidance on training and a whole education approach to prevention is also expected to encourage local public services, schools and youth services to refer survivors, including children and young people, to specialist services in local communities. The scope of national statutory commissioning guidance was consulted on in 2015/16, which we expect will be delivered from 2017.
- 1.9 However, as outlined above, local commissioners are already enacting cuts to specialist services which have been supporting families and communities affected by domestic abuse and other forms of violence against women for 40 years. We are concerned that **the specialist domestic abuse and sexual violence sector in Wales may be severely depleted or even non-existent by the time statutory commissioning guidance for specialist services comes into effect in 2017. If these services are lost, lives will be lost.**

2 Looking at the draft budget allocations for 2016-17, do you have any concerns from a strategic, overarching perspective, or about any specific areas?

- 2.1 At a strategic level, we appreciate Welsh Government has had some difficult financial decisions to make, and we agree with the focus on prevention and early intervention across priority areas: health and social services; educational attainment; supporting children, families and deprived communities, and growth and jobs. We also look forward to the use of a common definition of *preventative spend* to be agreed with the third sector, and we would welcome the opportunity to pilot what this would achieve for violence against women prevention in Wales.
- 2.2 We also support the need to embed into the budgeting process the 5 ways of working (integration, involvement, collaboration, prevention and long-term thinking) and 7 well-being goals (prosperity, resilience, health, equality, cohesive communities, culture and global responsibility) that are aligned with the Future Generations Act. At a national level, we are also pleased to see that the *Supporting People Programme* has been recognised as a key priority and protected in next year's budget with an allocation of £124.4m. Our membership, specifically survivors of violence and abuse, benefit from *Supporting People* and we welcome its continuation.
- 2.3 However, there is no guarantee that the national protection of *Supporting People* resources will mean local domestic abuse services retain their *Supporting People* funding. We remain concerned that specialist domestic abuse and sexual violence services in Wales, and the survivors that rely on them, face a postcode lottery dependent on whether local commissioners prioritise these services. These services include a range of needs-led and gender responsive approaches such as refuge and emergency housing, 'floating' community support, community-based advocacy, children's services and more. Most refuge services in Wales have low annual turnovers - significantly lower than their English counterparts - and any further cuts to services in 2016/17 will result in detrimental, possibly life-threatening, consequences for survivors of abuse.
- 2.4 Despite the announcement from Welsh Government that *Supporting People* will be protected, many of our members are still uncertain about their funding position and have either not yet been informed about funding decisions from April 2016 or have been told – despite national protection of *Supporting People* budgets – local domestic abuse provision can expect cuts in some areas of between 10-20%.
- 2.5 We also share concerns expressed by *Cymorth Cymru*, about the reduction in the Homelessness Grant, which aims to prevent homelessness. In some areas, this grant is used to fund domestic abuse provision which delivers savings to statutory budgets like housing, social care and health. Cuts to this grant combined with cuts to local *Supporting People* allocations will mean the sustainability of many local specialist services will be affected.

3. What expectations do you have of the 2016-17 draft budget proposals? How financially prepared is your organisation for the 2016-17 financial year, and how robust is your ability to plan for future years?

- 3.1 At the time of writing, Welsh Women's Aid has only 30% of its public sector funding confirmed from April 2016, which includes government contracted services (Live Fear Free Helpline and Ask and Act Training). As with all refuge-based domestic abuse services and violence against women services across Wales, our direct services for survivors in North

Wales have also not had funding confirmed from April (from various commissioners). Furthermore, our core grant from Welsh Government (already cut by 25% this year for *Children Matter* project delivery) remains unconfirmed from April.

- 3.2 Welsh Women's Aid core funding from Welsh Government is vital for the continuance of support to specialist member services in Wales. The funding enables us to help specialist services and local partnerships to develop and improve service delivery to survivors in Wales. This is achieved by providing policy and service updates, consultancy support on commissioning frameworks and service models, learning and development courses/materials and updates, statistical information and data reporting to inform needs assessments, consultation opportunities, survivor engagement, Children Matter preventative programme, and quality standards and accreditation for specialist services in Wales. We also support Welsh Government and statutory authorities with regards expert feedback on all aspects of violence against women issues. This includes development of guidance to support legislative delivery; needs assessments and commissioning models for effective early intervention and prevention work; and on needs-led service delivery models (Change That Lasts).
- 3.3 Last year in Wales we supported specialist services that between them made sure that over 10,000 adult survivors and nearly 4,000 children and young people were provided with refuge and community based advocacy and support by domestic abuse services in Wales; and our national Helpline received over 28,000 calls in 2014/15. Our highly experienced team have been successful in proactively raising additional funding from charitable trusts and foundations to support the Welsh Government strategy to improve services to survivors through capacity building for specialist services. Together, we aim to maximise financial and social value whilst ensuring specialist services enable survivors to achieve independence and freedom from abuse in Wales. We continue to make every effort to diversify our income but would not be able to continue with the level of support and development work we provide without core funding from Welsh Government.
- 3.4 At a local level, as outlined above, the expected budget cuts within specialist domestic abuse/violence against women services range from between 10-20% (*Supporting People*) and some public sector funding streams (like housing grants or small grants for children's support) will, we are told, be cut from specialist services altogether. The majority of specialist services that are cut will be significantly impacted: services that are already paying support workers from reserves, or that have already reduced staff hours to a minimum, will face closure if existing funding is not protected.
- 3.5 Planning for future years in domestic abuse/sexual violence services that are reliant on annual public authority funding is impossible to achieve for many services. Whereas policy and legislation focusses on long-term approaches to decision-making, this is not supported by a corresponding long-term approach to funding the third sector. Specialist domestic abuse services at present do not know what funding they have from April. The current funding climate for small specialist providers presents significant challenges with regards strategic business planning, service delivery and development and income diversification.
4. **The Committee would like to focus on a number of specific areas in the scrutiny of the budget, do you have any specific comments on the areas identified below?**

We have commented below on the areas that most closely relate to our core business.

Local health board financial arrangements

- 4.1 We are pleased to note that continuing to invest in the NHS to drive up standards, improve outcomes for patients and secure a sustainable, universal health service for the people of Wales is a priority. We also support increased investment into mental health and services for older people. We would like to see greater join up between health, social care and housing budgets, and how violence against women prevention is addressed strategically across these sectors. We **recommend that Ministers ensure NHS and social care investment enables these agencies to play a greater role in the prevention of domestic abuse, sexual violence and other forms of violence against women.**
- 4.2 Domestic and sexual violence and abuse has major public health implications, and represents an enormous cost to the NHS. The close link between such abuse and mental and physical ill-health, children's safety and wellbeing, plus the positive results of working in partnership, make it even more important that the NHS recognises and acts upon its responsibilities in this area. The NHS spends more time and money dealing with the impact of violence against women and children than any other agency, so action to tackle the causes and consequences of such violence is therefore not only cost-effective but contributes to the health and wellbeing of the population.
- 4.3 Therefore, in order to effectively achieve a healthier Wales, to reduce health inequalities, to close the gap in health outcomes and achieve a more equal Wales, it is vital that health and social care budgets prioritise early intervention and prevention of domestic abuse, sexual violence and other forms of violence against women. As a starting point, for example, and to demonstrate integration, involvement, collaboration, prevention and long-term thinking across Government, **Welsh Government funding arrangements in 2016 should require Public Health Wales, the Welsh Ambulance Service Trust, and the 7 Health Boards in Wales to:**
- **Commit to delivering a public health approach to preventing domestic abuse, sexual violence and other forms of violence against women.** This should involve transforming how policies and programming address this issue, in order to prevent it from occurring in the first place by directing policies and strategies towards changing the underlying causes, behaviours and attitudes that lead to the perpetration of violence against women. Key underlying determinants and contributing factors in its perpetration include inequality between men and women; cultural and social norms and practices and weak sanctions; and lack of access to resources and support systems.
 - **Commission the IRIS programme for health services and independent (third sector) specialist services** to deliver essential care pathways for all adult patients living with abuse and their children. In order to commission the IRIS model at a local level a minimum financial investment of approximately £70,000 is required for year to support general practice. Ultimately IRIS improves the quality of care for patients experiencing abuse and fulfils the moral, legal and economic case for addressing domestic abuse in general practice (2).
 - **Implement the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act associated guidance and the NICE Domestic Violence and Abuse Guidelines (PH50 2014)** which contain 17 recommendations for everyone working in health and social care whose work brings them into contact with people who experience or perpetrate domestic violence and abuse (3).

² <http://www.irisdomesticviolence.org.uk/iris/commissioning/>

³ <https://www.nice.org.uk/guidance/PH50/chapter/1-Recommendations>

Approach to preventative spending

- 4.4 The short-term false economy of cutting funding to specialist services at a local level fails to recognise that the cost of dealing with just one domestic violence homicide exceeds most of these services' annual budgets. The cost of domestic abuse alone in Wales is £826.4m annually (in service costs, lost economic output and human and emotional costs).
- 4.5 This short-term false economy also fails to acknowledge that these services collectively have expertise in protection, provision and prevention, built up over four decades. It is these services that the public sector are reliant on to refer survivors to when they identify violence and abuse; to support and advocate for survivors to help them navigate the myriad of statutory systems that fail to meet their needs; to advise public services on how prevention can be achieved and to deliver community engagement work to promote prevention.
- 4.6 Investing in tackling violence against women prevention, therefore, is a cost effective approach and resources to do this should be protected nationally. Even a small increase in the cost of providing specialist services is outweighed by the decrease in the costs to public services, lost economic output and the decrease in the human and emotional costs⁴. Incorporating requirements to prevent violence against women into and across all main budgets will help ensure:
- A prosperous and healthier Wales: responding effectively to abuse achieves better health outcomes and domestic abuse and sexual violence impacts on the productivity of employees and businesses. Domestic abuse alone costs the Welsh economy £100.9m in lost economic output each year.
 - More resilient, equal and cohesive communities: many women and girls are not able use public spaces with the same freedom as men and boys; actual and threatened violence and abuse constrains and limits women's and girls' choices, routine decision-making and behaviour in everyday life. Tackling violence against women will lead to safer communities, challenge stereotypes and social stigma, which in turn will promote inclusiveness and better community ties.
- 4.7 In order to become a productive and prosperous nation, with a highly skilled workforce and an economy that is globally competitive, it is vital that public and private sector employers are equipped to better respond to domestic and sexual abuse in the workforce. ***Welsh Government should promote the business case for violence against women prevention amongst all providers/contractors in receipt of Government investment, requiring them to:***
- Ensure they demonstrate corporate social responsibility by creating workplace policies, and training and educating employees on domestic and sexual abuse.
 - Promote and/or provide access to support for victims, and take action against perpetrators.
 - Exert leadership in local communities by supporting specialist services and promoting preventative campaigns and equality between women and men.

Sustainability of public services, innovation and service transformation

- 4.8 We support the priority given to support local authorities. However the approach taken, to invest in core budgets rather than through ring-fenced grants, has the potential to have a detrimental impact on public authority grants to violence against women third sector services. Several specialist services in Wales have told us that local authority cuts to their

⁴ Walby, S. (2009) The Cost of Domestic Violence: Update 2009. Lancaster: Lancaster University.

grant funding are made in order to prop up statutory provision. They also report that the value of partnerships with specialist independent providers like domestic abuse services is not recognised in many local authorities, where they are either quick to cut services and deliver similar provision in-house, or reduce specialist provision in order to contract with one large generic provider. Funding for domestic abuse and sexual violence services needs to be protected in the current financial climate.

4.9 ***We strongly recommend that the budget also prioritises the sustainability of the independent third sector (as well as the public sector), especially small specialist providers like domestic abuse/violence against women services.*** Women supported by our membership often face multiple discrimination and disadvantages based on their identities and life experience, including unemployment, low pay, housing problems, poverty or mental health issues. Women with severe and multiple disadvantage value women-only services to help them build resilience and recover from abuse or other adverse childhood experiences. The WEN Wales Women and Multiple-Disadvantage Survey (2015) – completed by 47 organisations and projects across Wales that support disadvantaged women – identified “a bleak picture of a worsening situation in which the cumulative effects of austerity, decreased funding, public sector cuts and welfare reform are contributing to disadvantage.”⁵ Successive evidence demonstrates the added value small specialist services can provide, and it is predominantly voluntary sector organisations that hold many of the values, ideas and approaches that will equip Wales to deliver innovation and transformation. Yet balancing demand against income is increasingly difficult; this is particularly marked in Wales where only 38% of charities think they will be able to continue doing this in the coming years.⁶

4.10 We welcome the intent to develop service delivery models which prevent or reduce the need for more costly state interventions, and we agree that innovation and service transformation is vital if we are to effectively prevent violence and abuse. However ***we also recommend investment should also be targeted at systems change and transformation (as well as public service innovation).*** Systems-change is being advocated by voluntary sector services like Welsh Women’s Aid and others, because at present, government-led systems across public services have developed to only be able to respond to one ‘need’ at a time, which in turn generate perverse situations where some of those in greatest need receive the least help. A government and public-sector led focus on interventions and co-ordination has also provided a distraction from the need to fundamentally reform existing systems:

“One solution that we like to generate is case coordination, where people are employed to help vulnerable individuals navigate the maze. This can reach surreal levels of inefficiency...The systems themselves aren’t required to change, they are just subject to the brokerage, advocacy and special pleading of professionals employed to champion the most disadvantaged. In other words, we employ one set of workers to try and persuade another set of workers to do the right thing”⁷

4.11 Nowhere is this more evident in systems set up to respond to domestic abuse. In many cases, survivors of abuse are being failed by systems that are created to serve agencies, and not improve the lives of survivors of abuse; a focus on risk has been accompanied by a reduction in needs-led responses, and a growing crisis of unmet need. If inter-related systems were changed to meet survivors’ needs from the outset, then resources would be saved and survivors of abuse would achieve a much greater positive benefit from their interaction with

⁵ <http://www.wenwales.org.uk/news/women-and-multiple-disadvantage-survey-summary-of-key-findings/>

⁶ Lloyds Bank Foundation (2015) Expert yet Undervalued and on the Frontline
http://www.lloydsbankfoundation.org.uk/assets/uploads/Expert_Yet_Undervalued_-_Grantee_Opinion_Survey_2015_WEB.PDF

⁷ Julian Corner (2013) Why Our Public Services Need System Change’, Lankelly Chase.

public authorities. To support a systems-change approach that transforms services **we recommend Welsh Government should ensure budgets support delivery of multi-agency statutory guidance that delivers systems-change and ‘change that lasts’; prioritising needs-led strengths-based delivery that places survivors of abuse at the centre of any intervention** (see appendix).

Welsh Government policies to reduce poverty and mitigate welfare reform

- 4.12 We support the vision for a more equal Wales, and action to tackle the causes and effects of poverty, the creation of cohesive communities where everyone has the support they need to live healthy, prosperous and independent lives.
- 4.13 However we recommend that **Welsh Government should ensure budgetary investment targeted at reducing poverty and mitigating welfare reform proactively addresses violence against women prevention and the negative impacts these have on women and children.** Evidence shows that female lone parents and single pensioner households will experience the biggest drop in living standards as a result of cuts to public services compared to other households. This is in addition to analysis by the House of Commons library which shows that of the £16bn in savings announced since the 2015 general election, three quarters will come directly from women⁸.
- 4.14 As one of several examples of how women as survivors of abuse are particularly impacted by welfare reform, the spare room subsidy has potentially life-threatening implications for women whose homes have been fitted with ‘sanctuary schemes.’ A judicial review was recently launched by a woman whose council home had been fitted with a secure room to protect her from a violent ex-partner and who was set to lose £11.65 a week from her benefits because she was deemed to have a spare room.⁹ This followed evidence last year that revealed 1 in 20 households across England using the sanctuary scheme had been affected by the spare room subsidy.¹⁰ We do not want women in Wales to face the same dangerous situation.

Impact of the Welsh Government’s legislative programme and whether its implementation is sufficiently resourced

- 4.15 Positive steps have been taken in Wales to introduce the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. It is anticipated that improvements to identifying violence against women by public services (as outlined above) will lead to increased demand on specialist services without addressing the geographical and funding gaps in provision of services.
- 4.16 At a time when the demand for refuges and other specialist services is expected to increase still higher, it is deeply worrying that such lifesaving services do not have sustainable funding to protect and support the most vulnerable women and children in Wales.

‘We feel this would result in adding further strain to an already busy service both refuge and drop in /community.’ (specialist domestic abuse service)

⁸ Women’s Budget Group response to spending review, 2015.

⁹ <http://www.theguardian.com/society/2014/nov/18/panic-room-woman-challenges-bedroom-tax>

¹⁰ <http://www.theguardian.com/news/datablog/2014/mar/14/bedroom-tax-domestic-violence-protection-scheme>

‘Refuge is a resource that is already oversubscribed,— for example just today we had 6 requests from women for a refuge room which would accommodate one woman and 3 children, including by women accessing our drop in service.’ (specialist domestic abuse service)

- 4.17 We urgently need consistent national and local commitment by funders, to sustain specialist services that work to prevent domestic abuse and other forms of violence against women in Wales. ***The recent legislative commitment by the Welsh Government must now be accompanied by a commitment to sufficiently fund the protection and support of survivors of domestic abuse, sexual violence and other forms of violence against women.***

Welsh language, equalities and sustainability

- 4.18 We welcome the commitment made to continue to resource Welsh language provision amongst key services, and also welcome the Government’s commitment to delivering Equality legislation duties.
- 4.19 Violence against women and girls is a human rights violation. One in every three women worldwide experiences physical and/or sexual violence at least once in their lives, usually by an intimate partner. United Nations (UN) Secretary–General Ban Ki-moon has proclaimed the elimination of violence against women as a top priority of the UN’s work and achieving “gender equality and empowering women and girls” is one of the Goals of *Agenda 2030 for Sustainable Development*, adopted by the 193 member states of the UN during the annual General Assembly (25 September 2015). One of the important targets of the goal is the elimination of all forms of violence against women and girls and the need for specialist women’s services to support survivors.
- 4.20 Black and minority organisations that support survivors of violence and abuse are most vulnerable to cuts and closure, even though they are well known in the communities they serve and have the highest numbers of women approaching them directly, rather than being referred on by police, social workers or others. Bigger, more generic services are rarely able to achieve this profile or these ‘self-referrals’. In work to eliminate violence against women, particular attention should be given to the rights and needs of women and girls facing multiple forms of discrimination, including women of ethnic minorities and with immigrant and/or refugee status, survivors of trafficking, women living in poverty, disabled women, LGBT+ women. In every case the inclusion of women’s voices is imperative in efforts to prevent or mitigate such violence.
- 4.21 We urge Welsh Government, through its budgetary processes and associated legislative and policy frameworks, to commit to contributing to the realization of equality between women and men and to the elimination of all forms of violence against women, which will transform the lives of women and girls in Wales. To achieve this, ***we recommend Welsh Government should ensure budgets deliver sufficient specialist women’s refuge spaces in Wales to meet the needs of women and children and a national network of independent specialist women’s services to support women and children to achieve independence and freedom from abuse.***

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

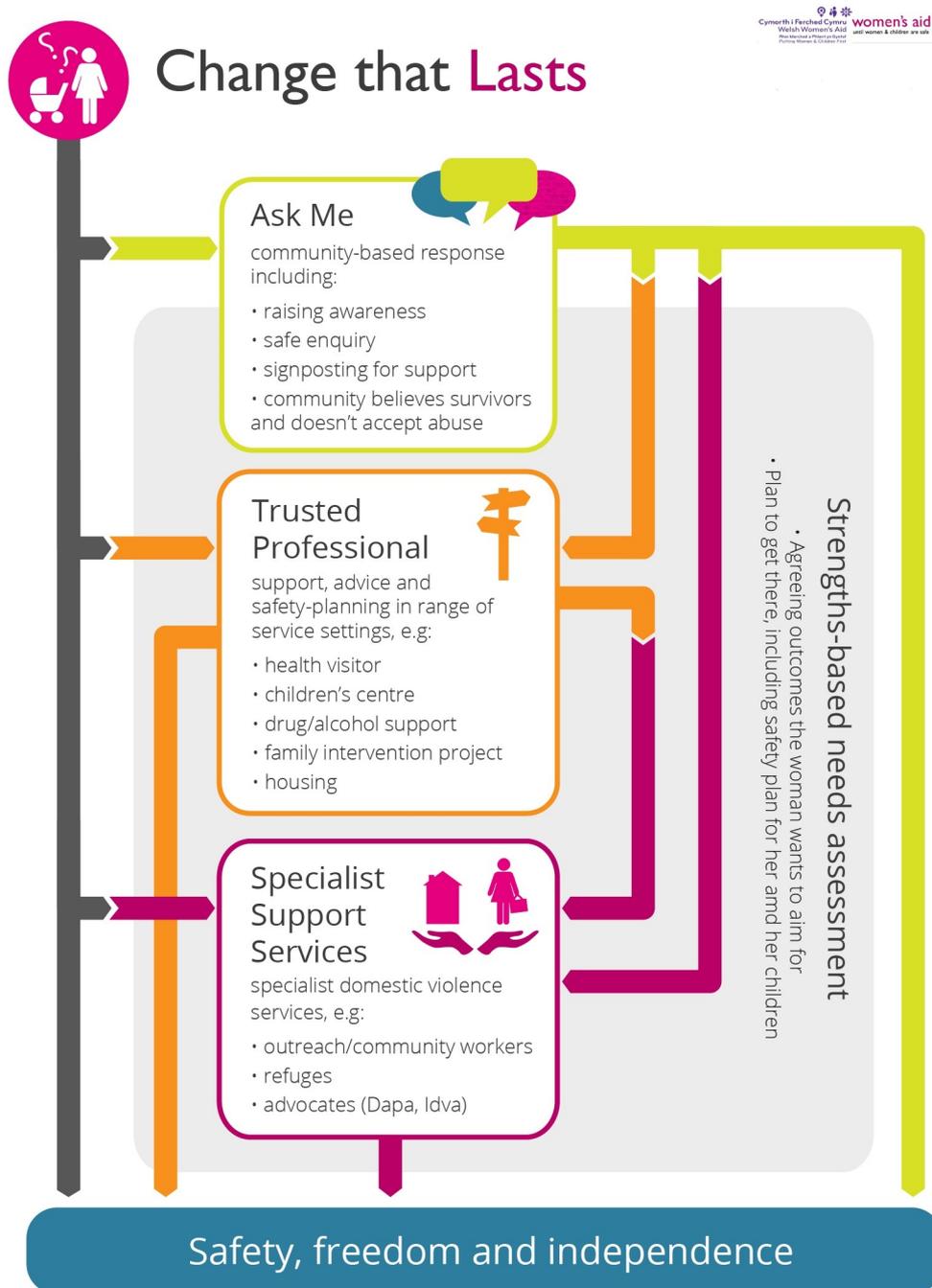
Alice Moore – Campaigns and Communications Officer

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Appendix One: Change that Lasts service model to achieve early intervention and prevention

Welsh Women’s Aid and Women’s Aid (England) have worked in partnership to develop a new, cross sector model response to domestic abuse and violence against women: Change that Lasts. In partnership with services and key national stakeholders from many related fields, we have reviewed current approaches and the systems in place and have developed a cross-sector common approach that places the survivor at the heart and builds responses around her needs and the strengths and resources available to her. **Change that Lasts is a strengths-based, needs-led model that supports domestic violence survivors and their children to build resilience, and leads to independence.**



Change that Lasts Case study (domestic abuse): Yasmin's journey

The true story of a domestic violence survivor, and what could have been, with needs-led intervention.

This is what actually happened.

Yasmin has always suffered from OCD and depression. She meets her partner in 2012 and moves in soon after. After 4 months the abuse starts when she discovers he is a heroin addict. After the first violent instance she attends Accident and Emergency.

At this point there was an opportunity for needs-led intervention, for someone to ask and act, for a referral to specialist support and help. Instead Yasmin is sent home with painkillers.

He beats her regularly. She sees A&E every fortnight. She calls the police more than 50 times but doesn't find their responses helpful. **The total cost of this is £102,938.**

Eventually she is referred to the local housing team. She is housed near the perpetrator **at a cost of £5,300**. He regularly breaks in until she agrees to move back in with him. After she moves back in, the violence starts again and he begins injecting her with drugs against her will. He tries to burn down the house with her inside. She escapes; at this point the perpetrator's behaviour assessed as 'high risk'. A MARAC meeting, **costing £11,900**, considers her case and decides to move her temporarily and put panic alarms in a new property. The cost of rehousing her and adding the alarms **is £5,752**.

He breaks in and the downstairs alarm fails. He holds her hostage, repeatedly raping and injecting her. After 5 days she makes it upstairs, and sets off the alarm upstairs. He is arrested but escapes a custodial sentence.



Cymorth i Ferched Cymru Welsh Women's Aid

Rhoi Merched a Phlant yn Gyntaf
Putting Women & Children First

Yasmin's Journey

The true story of a domestic violence survivor, and what could have been

- What actually happened
- What could have happened with needs-led intervention

