



Welsh Women's Aid Response on UK Government Call for Evidence – VAWG Strategy

Name:	<i>Jordan Brewer Policy and Research Officer</i>
Organisation:	<i>Welsh Women's Aid</i>
Email address:	<i>jordanbrewer@welshwomensaid.org.uk</i>
Telephone number:	<i>02920 541 551</i>
Address:	<i>Pendragon House, Caxton Place, Pentwyn, Cardiff CF23 8XE</i>
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>

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About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (comprising our membership of specialist services and members of the regional VAWDASV Specialist Services Providers Forums). 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, sexual violence 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 the Wales National Quality Service Standards (NQSS), 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/>)

Introduction

Welsh Women's Aid welcomes the opportunity to input on the development of the UK Violence Against Women and Girls (VAWG) Strategy 2021 to 2024 through this call for evidence. We also welcome the development of the strategy itself. In Wales the requirement for a national strategy has been crucial for ensuring implementation of the Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) (Wales) Act 2015 (the Act) and providing clarity and accountability in reaching the aims of the Act.

The specialist 'by and for' VAWG sector have set out a vision for a VAWG strategy which addresses some of the key concerns we have with the government's approach – including the decision to de-link domestic abuse from other forms of VAWG. 'Dual strategies' will fragment coordinated action to tackle VAWG, impacting women and girls with multiple and intersecting needs directly. We endorse



all the principles¹² and urge that they be fully integrated into the drafting of the strategy. We will link to relevant principles and their specific recommendations throughout.

¹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/02/Joint-Principles-for-the-VAWG-Strategy-2021-2024.pdf>

² <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/02/18pt-Joint-Principles-for-the-VAWG-Strategy-2021-2024.pdf>

Pendragon House, Caxton Place | Pentwyn, Cardiff | CF23 8XE
Tel: 02920 541551 | Fax: 02920 736128 |
Email: info@welshwomensaid.org.uk | Web: www.welshwomensaid.org.uk
Registered Charity Number: 1140962



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Key priorities for the UK VAWG strategy

Ensuring this strategy works for all survivors and is effective in its aims will require partnership with a diverse range of survivors, the specialist VAWG sector and wider by and for services. VAWG intersects with factors such as ethnicity, age, class, sexuality and disability to impact on experiences of abuse and routes to recovery.³ Misogynistic beliefs, attitudes and norms surround and drive the continuum of harassment, violence and abuse women and girls experience throughout their lives. Structural inequalities and discrimination based on class, sexuality, ethnicity, immigration status, ability, mental health or age, can lead to some women and girls being more likely to be abused and to face additional barriers in accessing justice and support. Intersecting inequalities within structures, practices and social norms can lead to additional layers of legitimising, condoning or concealing of harassment, violence and abuse which, in turn, sustains and reproduces these inequalities. Although we highlight this throughout our response we advocate for the voices of survivors and by and for services to be central throughout the development of this strategy.

As the national umbrella body in Wales that supports and provides national representation for independent third sector VAWG support and works to end all forms of violence against women and girls, we will focus our response on the below key priorities.

Key priorities

- 1) Not siloing Domestic Abuse and all other forms of VAWG.
- 2) Alignment with Wales on existing/ developing legislation and strategies.
- 3) A gendered approach and understanding to VAWG.
- 4) Funding and Commissioning: A commitment to the development and implementation of a sustainable funding model.

Not siloing Domestic Abuse and all other forms of VAWG

In Wales, all forms of Violence Against Women and Girls are viewed as intersecting and stemming from inequality between men and women. The approach of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 aims to tackle the root causes of VAWG as opposed to trying to treat each form of VAWG in isolation, with an overall goal of ending all forms of VAWG in Wales.

We want to highlight that Welsh Women's Aid does not agree with the UK Government's approach of developing two separate strategies, one for domestic abuse and one for all other forms of VAWG. Considering the evidence base for prevention and early intervention, seeing all forms of VAWG as intersecting, and the merits of taking a holistic approach to ending VAWG, putting each into silos does not make sense.

³ <https://www.nottinghamwomenscentre.com/wp-content/uploads/2018/07/Misogyny-Hate-Crime-Evaluation-Report-June-2018.pdf>





We would like to take this opportunity to advocate for a combined strategy, one that recognises each form of VAWG equally and in its own right, but that also acknowledges the intersecting nature of VAWG and how although specialist support in each area is vital for survivor's recovery, there is also prevention and early intervention approach of VAWG as a cause and consequence of inequalities between men and women is woven throughout as equally vital to ending Violence Against Women and Girls altogether.

We also feel that this strategy should recognise sexual harassment as a prominent part of VAWG. Giving weight to the harms of sexual harassment and not viewing it as a 'lesser harmful' form of VAWG will be important in regards to early intervention and prevention aims, and changing cultural and societal views on violence against women.

Alignment with Wales on existing/ developing legislation and strategies

As highlighted above in Wales there is a requirement for a national VAWDASV strategy to ensure implementation of the Act and its aims. The current national strategy comes to an end in 2021 and the process of developing the next strategy has begun with timeframes agreed upon. It would be prudent for there to be open communication throughout the development of each strategy to ensure alignment and consistency between the two, to be aware of how the each strategy will impact collaboration between devolved and non-devolved areas and that all public bodies are clear on their intersecting duties under each.

Welsh Women's Aid has also been commenting throughout development of the Domestic Abuse Bill statutory guidance document. Many of the references we have made regarding alignment between devolved and non-devolved multi-agency and joined up working of local authorities and health services with criminal justice and other agencies is also relevant to the development of this VAWG strategy. Both the statutory guidance and the VAWG strategy need to make clear reference to joined up working requiring alignment with Welsh legislative duties on devolved public bodies (including Welsh local authorities, health boards, NHS Wales and fire and rescue services) to ensure that there is not a discrepancy between the response survivors experience from differing bodies. The VAWDASV (Wales) 2015 Act has been in place for five years and a wealth of work and learning has been achieved. We would strongly encourage both documents reference existing work for both the sake of alignment and to prevent duplication of work where resources could be used for developing other areas of work. At a minimum the VAWG strategy must include alignment for non-devolved public bodies in Wales with and include links to:

- [Statutory Guidance for the Commissioning of VAWDASV Services in Wales](#)
- [Guidance for Local Strategies](#)
- [The National Training Framework on violence against women, domestic abuse and sexual violence](#)





These are key areas that Wales will need non-devolved bodies to engage or align with. Coherence between the criminal justice system, health and social care, welfare, children's and other community services as well as collaboration specialist services will be critical to achieving the aims of the guidance. The impact of UK Government decisions have on survivors and perpetrators in Wales has knock on effects to the provision within the devolved areas, especially for specialist services who are commissioned by devolved and non-devolved bodies. This crossover in impact and resourcing requires significant collaboration and coherence to ensure that the best outcomes are achieved.

There is a unique opportunity with both strategies being developed in tandem to ensure they are fully aligned. We would be more than happy as Welsh Women's Aid to help in facilitating some of this alignment work.

A gendered approach and understanding to VAWG

The UK VAWG strategy is being developed as the UK Domestic Abuse Bill (the Bill) is in its final stages. Throughout the development of the Bill we have continued to highlight that a key failing is the unwillingness to view domestic abuse and other forms of VAWG through a gendered lens. The VAWDASV (Wales) 2015 Act acknowledges the gendered nature of domestic abuse and situate it within the myriad of violence against women and girls. This is in line with the UK's commitments under international law - including the Convention of the Elimination of All Forms of Discrimination against Women (CEDAW) and the Istanbul Convention and the UN Convention on the Rights of Persons with Disabilities (Article 16). To truly end violence against women and girls in all its forms policies and practice must recognise interconnection of the breadth of abuse and violence women and girls experience in their lifetime and aim to dismantle the systemic inequalities which allow it to continue.

Funding and Commissioning: A commitment to the development and implementation of a sustainable funding model

Having national oversight of how specialist support and early intervention and prevention is funded enables strategic decisions to be made on service delivery and prevention initiatives. In Wales there is a commitment in the Welsh Government 2016 – 2021 national VAWDASV strategy to develop and implement a sustainable funding model which works to support *all* survivors, recognise intersectionality and end all forms of violence against women. A similar commitment should be made in the VAWG strategy to ensure survivors across the UK have access to the same levels of support and that there is also dedicated sustainable funding in non-devolved portfolios.

In late 2020 we published our annual State of the Sector report: Time to Act on Sustainability.⁴ The report demonstrates the case for sustainable funding for specialist services, the practicalities around developing a workable model, and includes specific actions for responsible agencies.

In the development of a sustainable funding model, with adequate funding for the specialist sector consideration must be made for equivalent level of investment to be included in the budget allocation

⁴ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/State-of-the-sector-2020-PDFdesign.pdf>





for devolved governments to maintain equity of potential provision for survivors. It is also essential that non-devolved commissioners align with joint commissioning structures in Wales to ensure the efficient use of funding and that specialist services in Wales are not further burdened with dual commissioning and reporting processes.

There must be adequate resourcing of the strategy to cover all aspects of VAWG. Part of this overarching strategical approach will also require uplifts in Welsh Government and Police and Crime Commissioner funding to ensure equitable investment and lastly the need to align commissioning processes to not additionally burden services. The VAWG strategy must include mechanisms for accountability, monitoring and reporting. These mechanisms should be informed by a strong evidence base. The four Women’s Aid federations⁵ have recently developed a Research Integrity Framework (RIF) on Domestic Violence and Abuse⁶ (DVA) which was developed to promote best practice and investigates what good research practice relating to DVA looks like. As with any policy or strategy, the success is in implementation, and we recommend integrating learning from the FRI. These mechanisms should embody structures to monitor and hold to account delivery and give services and survivors the power to question authority.

The joint principle on *Funding and Commissioning* recommends that the VAWG strategy:

- Is delivered alongside a secure, national multi-year funding settlement for the specialist VAWG sector, which ensures all forms of service provision for survivors, children and young people and perpetrators are resilient for the future, provides equity of provision for survivors across the UK nations, and is delivered by all government departments responsible for VAWG – including ring-fenced funding for specialist services led ‘by and for’ Black and minoritised women, Deaf and disabled women and LGBT+ survivors;
- Guarantees that local funding and commissioning processes adhere fully to the Equality Act and the Public Sector Equality Duty contained therein, and are led by partnerships, which reflect and represent the populations they serve – requiring the full inclusion of specialist ‘by and for’ VAWG sector in commissioning processes and outcomes;
- Systematically reforms the current competitive funding and commissioning landscape to ensure the specialist ‘by and for’ VAWG sector can fairly access funding - this requires
 - returning to long-term grant funding for VAWG provision,
 - ending competitive tendering where it is not required,
 - ensuring all funding and commissioning processes for VAWG recognise and value specialist support provision as required under the Istanbul Convention,
 - adopting established quality standards in the VAWG sector as the basis for funding, and

⁵ Welsh Women’s Aid, Women’s Aid Federation Northern Ireland, Scottish Women’s Aid, and Women’s Aid Federation England

⁶ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/Research-Integrity-Framework-RIF-on-Domestic-Violence-and-Abuse-DVA-November-2020.pdf>





- delivering core funding to organisations so that services genuinely access full cost recovery; and
- Ensures that all public funding for VAWG support promotes women-centred, trauma-informed, needs-led, holistic, accessible and wrap-around support services, as the sustainable way of addressing intersecting need and preventing further repeat victimisation and exposure to further risk. This requires moving away from a focus on funding through criminal justice outcomes, valuing women's healing and recovery more holistically and comprehensively, and ensuring women have a voice in the support they can access.

Achieving these priorities

Several actions must be embedded into the strategy to ensure successful implementation and monitoring of its goals. We have developed the following recommendations to ensure this happens. These recommendations have informed the Welsh sector representation to the Joint Principles developed by the VAWG sector.

Summary of key recommendations:

- A commitment to embedding prevention and early intervention.
- The requirement for national quality standards, with learning from Welsh Women's Aid National Quality Service Standards.
- Support for all survivors and an intersectional approach.
- Established mechanisms for monitoring and reporting.

A commitment to embedding prevention and early intervention

Previous VAWG strategies and guidance have a tendency to be heavily focussed on a risk based criminal justice response to tackling violence against. Working towards early intervention and prevention shifts the focus towards an approach which is strengths based, needs led and trauma informed.

In late 2020 we publish a Blueprint for Prevention,⁷ outlining how, through taking a public health approach to VAWDASV, we can make progress towards achieving our vision: a Wales in which all women and children live free from violence against women, domestic abuse and sexual violence, and by doing so achieve independence, freedom and liberation from oppression.

The blueprint operates on the recognition that violence against women, domestic abuse and sexual violence (VAWDASV) is preventable.

⁷ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/12/A-Blueprint-for-the-Prevention-of-VAWDASV27918.pdf>



The joint principle for *prevention* makes the following recommendations that the new VAWG strategy:

- Embeds prevention and early intervention as an integral part of the response to VAWG throughout the strategy and its delivery, challenging myths and stereotypes across society with accessible and effective communication campaigns and community responses that challenge perpetrator behaviour, and delivering critical change across all systems including schools, communities, health, welfare, social services as well as the criminal justice system (CJS);
- Ensures universal and accessible delivery of a ‘whole school approach’ across educational settings, which is supported by access to specialist support services for children and young people impacted by VAWG whilst also resourcing ongoing comprehensive evidence-based prevention programming in higher education settings that reaches every university student in the UK;
- Addresses poor probation arrangements that are leaving the most vulnerable children at risk of new and repeat offending by reviewing whether the sex offender register is fit for purpose;
- Ensures there is monitoring of the prevalence and nature of sexual harassment, including racialised forms of sexual harassment to which Black and minoritised women are subjected. and a statutory Code of Practice for employers to prevent and respond to sexual harassment and victimisation at work;
- Ensure that women in the precarious job sector who are often subjected to sexual harassment and sexual violence the workplace are protected by ensuring right sin the workplace and ending zero hours contracts;
- Equips all relevant government departments and statutory agencies to deliver an approach to preventing VAWG which addresses the experiences of all women – delivering reforms across government which will tackle gender inequality (such as equal pay and shared parental leave), paying close attention to intersecting inequalities and recognising that gender inequality cannot be separated out from other forms of inequality; and
- Recognise the integral role of, and ensures that this work is not done without, specialist ‘by and for’ ending VAWG services who need to be sustainably funded for their prevention and community work.

The requirement for national quality standards, with learning from Welsh Women’s Aid NQSS⁸

We advocate that the service and support received from any survivor should be of high quality. In Wales there are standards for domestic abuse services accredited by Welsh Women’s Aid that are aligned with a core set of shared standards. Women’s Aid in Wales and England, Imkaan, Rape Crisis England and Wales, Respect and SafeLives each have a set of quality service standards designed to address their respective and unique specialist work and drive forward quality.. The development of

⁸ <https://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>

Pendragon House, Caxton Place | Pentwyn, Cardiff | CF23 8XE
 Tel: 02920 541551 | Fax: 02920 736128 |
 Email: info@welshwomensaid.org.uk | Web: www.welshwomensaid.org.uk
 Registered Charity Number: 1140962





should take learning from WWA NQSS and the other established quality standards to ensure consistency in the commissioning of high quality service delivery and to minimise duplication of work.

Support for all survivors and an intersectional approach

Some women face additional challenges when trying to access support. Systemic barriers facing Black and minoritised women, migrant women, Deaf and disabled women, LGBT+ survivors and women facing multiple forms of disadvantage must be dismantled.

Under the commitments of the Istanbul Convention every survivor should have the right to support. The Domestic Abuse Bill is supposed to ratify the Istanbul Convention but in its current form will not as it does not guarantee support for migrant women with no recourse to public funds (NRPF). This is another area where VAWG and domestic abuse should not be separated and demonstrates how different factors intersect and that there needs to be a joint up approach to ensuring all survivors can access the support they need. In 2018/19 68% of referrals from women with NRPF to our membership of specialist VAWDASV services in Wales, were accepted (of the 44 referrals, 30 could be accommodated). However, the number of those supported who were eligible for the DV rule was only 5.⁹

In a report produced by Welsh Women's Aid and Disability Wales we recommended that all police forces to be trained in coercive control and violence against women, domestic abuse and sexual violence including in relation to disabled women. ¹⁰ At the time the report was produced survivors shared their experiences of additional barriers to support due to lack of police understanding when they disclosed.

This recommendation is linked with the *Rights and Access* Principle by the VAWG sector. The principle highlights that a coordinated strategy to end VAWG must be grounded in the UK's commitment to human rights, and obligations to take positive action to prevent and protect women from violence. The principle makes two key recommendations to ensure equal protection for women who are currently barred from accessing their rights, it recommends that the VAWG Strategy:

- Is designed to centre women and girls who experience sexual violence, forced marriage, so called 'honour based' abuse, FGM and other culturally specific forms of abuse,¹¹ and tackle the systemic barriers facing Black and minoritised women, migrant women, Deaf and disabled women, LGBT+ survivors and women facing multiple forms of disadvantage.

⁹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/12/NRPF-and-VAWDASV-Briefing-for-MSs-Final-ENG.pdf>

¹⁰ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/04/WWA-and-Disability-Wales-2019-report-Final-ENG.pdf>

¹¹ The term culturally specific forms of abuse is presently used to define form of abuse that occur in some communities. It is important that all forms of abuse and violence against women are recognised as rooted in patriarchy and inequality. While specific forms of abuse may be prevalent in some communities, all forms of abuse need to be addressed under a comprehensive approach to ending VAWG. The term culturally specific forms of abuse is being used to ensure a full and robust definition inclusive of all ways in which women and girls are subjected to violence. It is critical when using this term, that violence is not racialised to specific communities.



- Leads legal, policy and funding reform to deliver equal protection for all women – including: reversing the effective decriminalisation of rape and ensuring access to justice for all sexual violence survivors; full inclusion for Deaf and disabled survivors into the VAWG response; and ensuring migrant women can access the support, welfare systems and legal tools they need to escape abuse, and can report violence without fear of immigration enforcementⁱⁱ.

The principle for *Specialist By and For* provision will also be vital for ensuring an intersectional approach to ensure there is support that meet the needs of all survivors. We’d like to draw out the specific recommendations of this principle:

Specialist services are perennially at risk within the funding landscape, undercut by general support services who can compete on cost but not on meeting survivors’ needs. We recommend the next VAWG strategy:

- Clarifies the legal responsibilities of the government and public bodies to sustainably fund *specialist* support services, including for women and children, under Article 22 of the Istanbul Convention.
- Delivers a robust system of national accountability, based on established quality standardsⁱⁱⁱ within the VAWG sector, to ensure survivors of all forms of VAWG can access the *specialist* support services they need – including services led ‘by and for’ survivors with protected characteristics.

Conclusion

A UK VAWG strategy is essential for ensuring all survivors have access to the right support and that across the United Kingdom we are working towards ending all forms of violence against women and girls as a priority, and we welcome its development.

Partnership with survivors and the specialist sector will be vital, throughout both development and implementation. We cannot eradicate all forms of VAWG which interacting with them in silos, and a prevention and early intervention approach will be key reaching this goal.



Annex A: Welsh Women's Aid Key evidence documents

- [State of the Sector: Time to Act on sustainability](#)
- [A Blueprint for Prevention](#)
- [COVID-19 Briefing: Recommendations for short medium and long-term](#)
- [Research integrity framework](#)
- [Sexual exploitation paper](#)
- [Supporting disabled people experiencing violence against women, domestic abuse and sexual violence in Wales](#)
- [No recourse to public funds: No woman or child turned away](#)
- [Cheques and Balances: The Economics of Abuse](#)
- [Children Matter: Children and Young People experience violence and abuse too'](#)
- [Ask Me project](#)
- [National Quality Service Standards](#)

ⁱ Rape Crisis England and Wales, End Violence Against Women Coalition, Imkaan and Centre for Women's Justice, The Decriminalisation of Rape: Why the Justice System is Failing Rape Survivors and What Needs to Change, 2020.

ⁱⁱ This is not an exclusive list of the reforms required to protect and support all women experiencing VAWG, and as we learn more about VAWG we understand more about the inequalities and barriers which bar women from safety, support and justice.

ⁱⁱⁱ For example, the Violence Against Women and Girls Sector Shared Core Standards developed by Imkaan, Rape Crisis England & Wales, Respect, SafeLives and Women's Aid Federation of England.

