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Welsh Women's Aid: Consultation Briefing

A New National VAWDASV Strategy for 2022-26

Introduction

The current National VAWDASV strategy comes to an end in 2021. Welsh Women's Aid have been working to inform the development of a new strategy, considering achievements since implementation of the VAWDASV (Wales) Act 2015 and laying out our key priorities for ensuring all survivors of VAWDASV are protected. We are keen to see a new national strategy and delivery plan which includes cross-government action, which is developed, implemented, and monitored in partnership with survivors and the VAWDASV sector.

The new strategy must be ambitious, and include measurable cross-government actions, as well as leadership for local authorities and health boards. There must not be a significant gap between the two. Welsh Women's Aid has committed to supporting Welsh Government in developing this strategy and have offered facilitation of specialist sector and survivor consultation, through focus groups as well as provide data and evidence to inform its development.

This document sets out a series of principles that we collectively recommend are used to inform the final development of the new National Strategy. This document includes a series of recommendations echoed across Time to Act on Sustainability: State of the Sector 2020,¹ A Blueprint for Prevention,² Welsh Women's Aid Manifesto Priorities for Welsh Political Parties 2021,³ and Joint Principles for the UK Government VAWG Strategy 2021-2024.⁴

¹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/State-of-the-sector-2020-PDFdesign.pdf>

² <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/12/A-Blueprint-for-the-Prevention-of-VAWDASV27918.pdf>

³ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/WWA-Feministo-for-Party-Manifestos-Design-V2.pdf>

⁴ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/02/Joint-Principles-for-the-VAWG-Strategy-2021-2024.pdf>

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Principles

1. Outline clear and transparent governance, leadership and oversight for the delivery of the National VAWDASV Strategy.
2. Embed a rights-based approach, recognising the duties in international law to enable every woman and girl to live free from abuse.
3. Ensure the strategy is supported by resourcing, sustainable funding and robust commissioning practices.
4. Enable survivor led engagement in the production, delivery and monitoring of the strategy.
5. Centre the prevention of VAWDASV, through a public health approach.
6. Ensure the strategy supports the sustainable resourcing and provision of specialist 'By and For' provision.
7. Support a whole systems, needs led, trauma informed approach.
8. Equitably cover to all forms of violence, harassment and abuse women and girls experience throughout their public and private lives.
9. Ensure an end to the postcode lottery of specialist support for Children and Young People.
10. Utilise robust evidence base and clearly set out mechanisms for monitoring accountability and delivery.

Below is evidence and recommendations for the new strategy to support the embedding of these principles. Also below are links to a range of [Essential Evidence](#) documents to support an evidence-based approach.

1. Governance, Leadership and Oversight:

To deliver a robust strategy that implements the ambitions of the VAWDASV (Wales) Act 2015 there needs for effective national and regional governance structures that include specialist service representation, particularly for smaller local services and 'by and for' services as well as a diversity of survivor voices. Welsh Women's Aid would be keen to see the re-establishment of national governance structures to provide oversight of the delivery of the purpose of the Act and the National strategy and delivery plan. This must ensure that smaller specialist sector services have an equity in representation as well as ensuring that all forms of VAWDASV are within its purview, providing governance oversight to groups such as: Honour Based Abuse group, All Wales sexual exploitation group,

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Sustainable Funding Task and Finish group, Perpetrator workstream meetings, Communications and Campaigns Stakeholder group and the recent COVID strategic group and vulnerable children and safeguarding group.

At present there is no collective framework under which these areas and groups sit within the work of the National Strategy or provide links to related areas of government work such as housing, curriculum development, safeguarding, child sexual abuse strategy, modern slavery, equalities, mental health and substance misuse. It is vital that the proposed blueprint and new strategy are representative and provide cross government directorate framework to oversee delivery. A national framework would have the role of monitoring and reviewing on progress to the national strategy and delivery plan and bring together collaborative working that has been instigated before and during COVID to ensure alignment with the strategic delivery of the duties in the Act.

At a regional and local level our members are concerned that the shift in prioritising VAWDASV at a strategic level and the lack of recognition that VAWDASV is a cross cutting issue, in particular the lack of senior commitment to Regional VAWDASV Boards and the move to encompass VAWDASV in wider generic Vulnerability boards (as is the case in North Wales). There needs to be scrutiny from Welsh Government to ensure that the strategic regional leadership is committed to across all devolved public bodies within the VAWDASV (Wales) Act 2015 is actually happening on the ground to ensure the prioritising of prevention, support and protection.

Recommendations

- Create a national strategy and delivery plan which includes cross-government action, developed, implemented, and monitored in partnership with survivors and the specialist sector.
- The new strategy must be ambitious, and include measurable actions cross-government, and set out how it will work with devolved public body duties of local authorities and health boards.
- Re-instate a national oversight group led by the Minister, with cross government, public sector, VAWDASV sector and survivor representation, this groups should provide a framework for thematic groups to feed into.

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- Implement the requirement for regional strategic VAWDASV boards to build collaborative governance of strategies at local levels in line with Welsh Government Local Strategies Guidance.⁵

2. Rights-based approach:

Welsh Women's Aid welcomed the Welsh Government announcement in October 2018 that it supported the Istanbul Convention in principle and call for the UK government to ratify. In the current National VAWDASV Strategy, the Welsh Government sets out its commitment to the articles of the convention that align to the reserved powers of the Welsh Government. The convention sets out a minimum standard for adhering states to “take necessary legislative and other measures to promote and protect the right for everyone, particularly women, to live free from violence in both the public and private sphere.” (Article 4)

If the Welsh Government is to adhere to its statement of support then the new strategy must meet the requirements of the convention to ensure all survivors have a right to support. As the convention sets out violence against women, domestic abuse and sexual violence is both a cause and consequence of gender inequality.¹⁴ The promotion of gender equality and human rights framework should be explicit throughout the national strategy.

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 violence and abuse which, in turn, sustains and reproduces these inequalities. 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.

The Domestic Abuse Act 2021 failed to meet commitments under the Istanbul Convention, particularly as it does not guarantee support for migrant women with no recourse to public funds (NRPF). In 2020-21 29% of referrals from women with NRPF to refuge s in Wales, were not accepted due to the lack of capacity or resource to meet the need. Welsh Women’s Aid are urging the Welsh Government to have its own approach to ensuring all survivors have access to safety and support in line with its commitments to be a Nation of Sanctuary.

⁵ <https://gov.wales/violence-against-women-domestic-abuse-and-sexual-violence-guidance-local-strategies>

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Welsh Women's Aid has been formally advised by barristers that the Welsh Government would be acting within its powers if it provided a fund to support survivors affected by the NRPF rule. We therefore urge the Welsh Government to be bold and lead the way on implementing Article 4 of the Istanbul Convention through providing a last resort fund to support women with NRPF within its new strategy.

In our joint report with Disability Wales⁶ we made a series of recommendations for Welsh Government which we feel should be included as commitments in the next strategy. Particularly around incorporation of the UN Convention on the Rights of Disabled People (UNCRPD) in Welsh policy and legislation, access to support and strategic regional partnership. It is vital that the new strategy enables equal access to support through effective resourcing of services as well as ensure that the National Training Framework delivery adequately improves understanding and response for disabled women who are survivors of VAWDASV.

The new strategy is being developed parallel to Wales' LGBTQ+ Action Plan and the Welsh Government Race Equality Action Plan. These three strategies should be supportive of one another and work holistically to tackle the root causes of violence and inequality. Cross governmental work should facilitate joined up working across strategic areas to align equalities work and VAWDASV.

Recommendations

- Ensure the 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,⁷ 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.

⁶ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/04/WWA-and-Disability-Wales-2019-report-Final-ENG.pdf>

⁷ 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 VAWDASV. 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.

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- Lead and inform legal, policy and funding reform to deliver equal protection for all women – including: full inclusion for Deaf and disabled survivors into the VAWDASV 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 enforcement.
- Welsh Women's Aid propose that the Welsh Government commits to a ring-fenced 'last resort destitution fund' for the purpose of securing specialist support and accommodation for destitute migrant survivors of VAWDASV, until a long-term solution is established.
- Ensure alignment with strategies and actions plans including Wales' LGBTQ+ Action Plan, Race Equality Action Plan, Disability Action Plan, Gender Equality Review and Nation of Sanctuary Action Plan. These should not be one off activities but systemically connected to ensure continuous cross thematic working. These should engage survivors and specialist services in the development, delivery and monitoring of activities.

3. Resourcing, sustainable funding and commissioning:

Currently in Wales there is no overall understanding as to what is spent (nationally or locally) on preventing VAWDASV or in responding to survivors and holding perpetrators to account. The Wales Audit Office report⁸ *Progress in implementing the Violence Against Women, Domestic Abuse and Sexual Violence Act 2015* which concludes that funding of VAWDASV services is generally fragmented, complex and short term, and commissioning is too inconsistent to ensure public bodies are always getting value for money. Mapping carried out over the last 4 years has focused on what is the current investment into specialist services rather than looking at what is spent as a whole across statutory, generic and specialist provision. There is little evidence or transparency that budgetary commitments are matched to prevalence data from a range of sources or consistent needs analysis. There has been little analysis of how budgets across government agendas invest in preventing VAWDASV and protecting and supporting survivors. Currently the investment decisions are not joined up, making it impossible to evaluate if we are effectively investing to achieve the common goal of eradicating VAWDASV.

⁸ <https://www.audit.wales/publication/progress-implementing-violence-against-women-domestic-abuse-and-sexual-violence-act>





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There was a commitment to the development of a sustainable funding model in the 2016-2021 National Strategy, the new strategy must include a commitment to the implementation and monitoring of this model. We have outlined what a sustainable funding model should look like and a plan for development and implementation in our 2020 State of The Sector report.⁹

Recommendations

- The strategy needs be accompanied with a clear budget commitment to ensure that the strategy objectives and the related actions in the delivery plan are sufficiently resourced from across government.
- Cross governmental approach to budgeting for VAWDASV to ensure that the investment based on the prevalence of VAWDASV in populations and the evidence into social, financial and environmental costs of violence against women, domestic abuse and sexual violence across portfolios of health, housing, education, social care, economy and employment.
- Create a national mechanism to have oversight of funding provision at national and local level. Ensure adequate investment both geographically and across forms of VAWDASV based on effective needs assessment.
- Clarify who is responsible and accountable for commissioning the range of services to meet the various needs, and ensure every region has mechanisms in place to deliver and coordinate strategic VAWDASV commissioning collaboration.
- Ensure systems are in place to quality assure and monitor regional commissioning strategies and hold commissioners to account for implementing the statutory commissioning guidance across Wales.
- Ensure adequate and sustainable investment in support for children and young people specialist provision. Working with children and young people affected by VAWDASV aligns with work in ACEs and children in the care system; there must be alignment in investment.¹⁰

⁹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/04/WWA-and-Disability-Wales-2019-report-Final-ENG.pdf>

¹⁰ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/11/Children-and-Young-People-participation-report-FINAL.pdf>

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4. Survivor led:

In 2015 prior to the current strategy, the then National Adviser led a process of engagement with survivors across Wales that resulted in the Are You Listening, Am I Being Heard? Report.¹¹ This report outlined the experiences of survivors of VAWDASV across geographic areas and forms of VAWDASV. In it, survivors set out 10 recommendations that were included in the current strategy. There needs to be a review of these recommendations within the process of developing a new strategy to measure progress and to identify what remains relevant.

Creating effective partnerships with survivors, specialist services and public bodies strengthens our ability to achieve change that lasts. It is vital that any strategy recognises that to achieve this involves coordinating and supporting survivor engagement, ensuring diverse voices are amplified and opportunities to centre the lived experiences of women and girls impacted by abuse and multiple disadvantages are maximised, so that no woman is left behind.¹²

Survivors also includes children and young people, it is important to consider how the voices of children will be heard with the development of the new strategy, particularly when focusing on prevention and early intervention.

Recommendations

- Carry out a review with survivors of the 10 recommendations included in the National VAWDASV Strategy 2016-2021.
- Ensuring survivor engagement is prioritised throughout the development and implementation of the new national strategy. It should also be recognised that the specialist sector have the trust of survivors to support them in this process, including the time needed to provide training to contribute on all levels and onward trauma informed support.
- Funding specialist services to continue supporting survivor engagement will ensure a range of experience, supports the safety and wellbeing of survivors, and continues the improvement and development of services and practice.

¹¹ https://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/Are_you_listening_and_am_i_being_heard_FINAL_July_2016.pdf

¹² <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/10/WWA-2019-24-Strat-Landscape-EN-DigiVersion-HighRes.pdf>





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- Survivor engagement must be intersectional and reflect the diversity of women and girls in Wales and their differing experiences of violence and abuse.
- Working with specialist services, facilitate engagement of children and young people to inform the development of the new strategy.

5. Centre prevention

For years, experts have been referring to violence against women as a major public health problem.¹³ This recognises the intersection of factors occurring at the societal, community, relationship and individual levels which increase the likelihood of VAWDASV.¹⁴ Applying a public health approach to VAWDASV requires implementing three types of prevention interventions: primary, secondary, and tertiary prevention across all these levels.¹⁵

Alignment between the duties of the VAWDASV (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015 should mean our public bodies can be ambitious in prioritising the prevention of VAWDASV. This includes investing in public health campaigns that challenge and change attitudes, high-quality relationships and sexuality education for all children and young people, and community engagement programmes that increase communities' knowledge and confidence to enable them to address the root causes such as gender inequality and intersecting discrimination.

Recommendations

- Set out a clear budget commitments across public health, education and community engagement to support prevention work across Wales.
- Ensure alignment of the implementation of the RSE curriculum with the strategy and enable the engagement of VAWDASV leads and specialist services with RSE leads and education professionals.
- Include the co-production of long term public health campaigns aimed at challenging and changing attitudes, align these to community training programmes.

¹³ <https://www.who.int/news-room/fact-sheets/detail/violence-against-women>

¹⁴ Hagemann-White et al. (2010) 'Review of Research on Factors at Play in Perpetration'; <https://www.humanconsultancy.com/assets/understanding-perpetration/bin/Review%20of%20Research.pdf>

¹⁵ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/12/A-Blueprint-for-the-Prevention-of-VAWDASV27918.pdf>





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6. Specialist 'By and For' provision:


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'By and for' Black and minoritised survivors specialist services are skilled in identifying needs and experiences of specific forms of VAWDASV that may be missed by services not led by and for women within these communities. Research has shown that support work provided by specialist by and for Black and minoritised women services should be considered 'case work plus, plus, plus':¹⁶ the issues to be dealt with are never just about VAWDASV, intersecting with racism, immigration, poverty and community. This was not reflected in funding frameworks. The one-size-fits-all or the add on afterwards of specialisms of most commissioning fails to fully take account of the range and flexibility of provision needed.

Specialist by and for services offer a range of provision and are able to reach women who may not even recognise their experiences as abusive and create flexible and diverse support systems, sensitive to the fact that for many Black and minoritised women, refuge, counselling or other support services may be unfamiliar and/or stigmatised. COVID-19 disproportionately impacted diverse communities and exacerbated existing racialised inequalities due to structural inequalities. This needs to be recognised in the planning of funding for the long-term response, bringing the margins to the centre.¹⁷

Recommendations

- Include commissioning of 'by and for' Black and minoritised women specialist support services. As highlighted in our calls for sustainable funding, specialist services for minoritised women must exist to protect specialist knowledge and support. This should include funding for community engagement, communications and survivor engagement as well as providing specialist survivor services.
- Include commissioning of inclusionary services for LGBTQ+ survivors. In its review of the implementation of the VAWDASV (Wales) Act 2015 the Wales Audit office found there is still insufficient provision of VAWDASV services for members of the LGBT community across Wales. Commissioning of these services is essential to ensuring all survivors have the access to safety and support they deserve.

¹⁶ https://www.tavinstitute.org/wp-content/uploads/2020/03/Safer-Pair-of-Hands-Report_Final-Published.pdf

¹⁷ https://829ef90d-0745-49b2-b404-cbea85f15fda.filesusr.com/ugd/2f475d_6d6dea40b8bd42c8a917ba58ceec5793.pdf



7. Whole systems, needs led, trauma informed approach

Communities, workplaces and services such as GPs, schools or housing providers are often first to know about abuse; survivors have told us that they have previously reached out for support in communities from family and friends or professionals in various services prior to getting specialist support. The Change That Lasts¹⁸ whole systems approach provides a model of prevention, response and support intervening at the earliest possible opportunity to limit harm by perpetrators of abuse, reducing tolerance to abuse in communities and provide trauma informed services working to support survivors by building on their strengths and addressing their needs. Learning from delivering the Ask Me and Trusted Professional elements of Change that Lasts saw how communities engaged in early intervention contribute to increasing the space for survivors to take action and limits the opportunities perpetrators have to continue abuse. This is proven to enable long term freedom from abuse making it a cost-effective investment.¹⁹

A whole systems approach requires all agencies (statutory, third sector and specialist) to provide trauma informed responses to VAWDASV, moving away from a short term, risked based approach to looking to provide services that work to deliver longer-term stabilisation, empowerment and rebuild lives of both adults and children.

Recommendations

- Ensures funding structures are designed around a comprehensive approach to addressing VAWDASV which means long-term sustainability enabling organisations to plan and deliver appropriate and accessible provision
- Be transparent about the amount and use of funding provided to the public sector to ensure that they have the capacity to effectively provide early intervention and signposting, including fully implementing national training framework through delivery by specialist services to ensure professionals provide the right response to survivors.
- Ensure the strategy enables engagement and alignment with the implementation of the Justice Commission recommendations, to ensure improvements in the justice system for Wales increase survivor (including children) access to justice, safety and support as well as effectively holding perpetrators to account.

¹⁸ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/10/Change-That-Lasts-Evaluation.pdf>

¹⁹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/10/Change-That-Lasts-Evaluation.pdf>



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- Ensure commissioners and funders provide funding frameworks and outcomes measurement for specialist services that enable a needs-led, strengths based response to survivors aimed at long term freedom from abuse.

8. Equitable approach to all forms of Violence against Women and Girls

The previous strategy supported the holistic UN definition of violence against women and girls, as well as aligning to the Istanbul Convention which has subsequently been further committed to by the Welsh Government. Violence against Women and Girls permeates women's public and private spaces throughout our lives; this violence and abuse is interconnected through being rooted in intersectional gender inequality as well as perpetuating this inequality.

This will require recognising all forms of violence against women and girls as set out in the Istanbul Convention and UN definition within the National VAWDASV Strategy and ensuring these are equitable recognised within governance structures, delivery frameworks and monitoring processes.

We need a clear commitment to ensure equal protection, prevention & support for women and girls harmed, or at risk of harm, of sexual exploitation in Wales. Welsh Women's Aid calls for Welsh Government to recognise Sexual Exploitation as a form of Violence against Women and Girls, domestic abuse, and sexual violence (VAWDASV).

We recommend that the strategy strengthens its commitment to addressing the needs of all sexual violence survivors including historic sexual violence survivors and outlines further how it will improve the accessibility of needs-led specialist support for sexual violence survivors within a framework that enables women and girls to cope and recover from their experiences. Join up is needed in the commissioning and funding of rape crisis provision, SARC provision and ISVA services, that brings together resourcing at UK and Wales national levels, with health boards, local authorities and police and crime commissioner budgets.

The strategy needs to outline explicitly how prevention, protection and support will be targeted for FGM, forced marriage and so-called honour based violence. The strategy should clarify public services' accountability to implement existing statutory Forced Marriage Guidelines and FGM guidelines and provide leadership to those devolved authorities that play a critical role ensuring the protection of those at risk of forced

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marriage, including survivors who are vulnerable, disabled and LGBT+ survivors at risk of forced marriage.

The strategy not only needs to recognise social media and other digital spaces as effective tools of sharing preventative messages but also as 'spaces' where violence against women and girls occurs. For the strategy to be effective over its five year period it needs to take in to account future trends and spaces of violence against women. We suggest that work to prevent on-line sexual exploitation, digital stalking and associated abuse is addressed within the strategy, and consideration is made regarding the alignment with the Online Harms Bill currently going through the UK parliament. Principles for the Online Harms Bill to consider online violence against women and girls have been set out within the evidence call.²⁰

Welsh Women's Aid No Grey Area campaign has provided evidence that four out of five women in Wales have experienced some form of sexual harassment at work.²¹ The vast majority of women who responded to the survey experienced harassment on more than one occasion and from more than one person in their workplace. A lack of support, guidance and fundamental structures in place to prevent sexual harassment from happening at work was reported by many of the respondents. Without employers adopting a clear and preventative approach to dealing with sexual harassment, it is very unlikely that we can 'break the cycle' of systemic workplace sexual harassment.

Recommendations:

- A commitment to national vision to end women's exploitation within the new Welsh Government National VAWDASV Strategy. Ensuring that implementation and delivery acknowledges the vulnerabilities and the needs of those who are, or have been, engaged with the sex industry/survival sex.
- Including women with lived experience of so called honour based abuse, FGM, sexual violence, sexual exploitation and/or engaged in the sex industry in the national survivor engagement framework to ensure their voices are central in the development of policy and strategies.
- The strategy should make explicit the connections between the VAWDASV work, the work of the Anti-Slavery Leadership Group and the role of the Anti-Slavery

²⁰ <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/VAWG-Principles-for-the-Online-Safety-Bill-150921.pdf>

²¹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/03/No-Grey-Area-Survey-Report-ENG.pdf>



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Coordinator to ensure that trafficking for sexual exploitation and domestic servitude are clearly recognised as a form of violence against women and girls.

- The strategy needs to outline explicitly how prevention, protection and support will be targeted for FGM, forced marriage and so-called honour based violence.
- Strengthen the focus on sexual violence, particularly to improve the accessibility of needs-led specialist support for sexual violence survivors within a framework that enables women and girls to cope and recover from their experiences.
- A commitment to ensure the development of remote hub working spaces includes effective policies and procedures to prevent sexual harassment, support those experiencing it and hold perpetrators to account.
- Strategy to recognise and include actions to prevent, protect and support women and girls from online VAWDASV. This should include ensuring that survivors in Wales are covered effectively within the new Online Harms Bill.

9. Support for Children and Young People

Concerns have consistently been raised by services and wider stakeholders about the existing postcode lottery of specialist services for children and young people affected by VAWDAS across Wales. We are concerned about the current capacity levels of specialist services to provide adequate support and the knowledge of public bodies, including schools, to enable early intervention and referral routes to specialised services. Limited specialist support and ineffective statutory responses to disclosures are leading to some young reporting significant impact on their ability to recover from the abuse.²²

The 'I Trust Them' Report 2021²³ highlighted the need to address the way in which children and young people who are experiencing VAWDASV are responded to when they seek support, as well as improving education and awareness-raising around what constitutes VAWDASV. The findings suggest that normalisation / lack of understanding of abuse, combined with a culture of victim-blaming, remain prevalent factors affecting young people's likelihood of seeking support. It is also clear that key institutions, especially the police and education, are not considered accessible, desirable, or trustworthy places to seek support by many young people, and that this is partly due to previous bad experiences

²² <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/06/I-trust-them-CYP-Resilience-Survey-Report-English-1.pdf>

²³ Ibid





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and/or lack of means to attend. This is more pronounced for young people from Black and minoritized backgrounds.

Worryingly, there are still some specialist VAWDASV services in Wales that do not have any dedicated funding for support children and young people. Provision is very limited when compared to the population in the areas of service coverage. Short-term (mostly from trusts and foundations) and low levels of funding means that services are precarious. This impacts on staff-turnover and service continuity, which impacts adversely on children and young people who have experienced trauma and need time to build trusting relationships with professionals.

This said, some VAWDASV services in Wales are offering trauma-informed specialised domestic abuse and sexual violence counselling, and play therapy services for children and young people, which could inform best practice and development and commissioning of further services.²⁴

The current lack of strategic commitment and funding is often due to the needs of children and young people affected by VAWDASV not being identified within strategic commissioning processes. Often specialist service funding is centred on adults needs, meaning children and young people's provision, if available, is often incumbent of an adult entering services.

- The strategy explicitly outlines a commitment to address the provision of children and young people's specialist support and that it includes a commitment for national and local recognition of the role and value of specialist children and young people's services including within any model for sustainable funding of the specialist services that is developed.
- The strategy should ensure that Local Authorities, health boards and regional partnership boards engage with specialist services to identify gaps in provision for children and young people to inform collaborative commissioning. This should also include data from specialist services to inform the RPB population needs assessments and the inclusion of children and young people funding objectives in VAWDASV strategies.
- Ensure the facilitation of collaboration between schools, social services, specialist services and the health board to ensure a multi-agency VAWDASV informed

²⁴ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/11/Children-and-Young-People-participation-report-FINAL.pdf>





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approach, clearly identifying the full referral pathway to support for children and young people.

- Work collaboratively with specialist services to establish a needs assessment that focused on prevention and early intervention, which includes information on resources and referral pathways as part of a whole-school approach, linking with the implementation of the RSE curriculum.
- Ensure join up between public bodies and specialist services regarding the provision of sufficient mental health care of children and young people who have experienced violence and abuse.

11. Evidence and Accountability:

The new national strategy should clearly define and outline duties on local authorities and all agencies under the Act. The new strategy must be ambitious, and include measurable actions cross-government, local authorities and health boards. There must be a robust governance structure in place nationally and locally to inform development, delivery and monitoring of the strategies implementation. The four Women's Aid federations²⁵ in the UK have recently developed a Research Integrity Framework (RIF) on Domestic Violence and Abuse²⁶ (DVA) which was developed to promote best practice and investigates what good research practice relating to domestic abuse looks like. As with any policy or strategy, the success is in implementation, and we recommend integrating learning from the RIF. These mechanisms should embody structures to monitor and hold to account delivery and give services and survivors the power to raise questions.

The Statutory Guidance for the Commissioning of VAWDASV Services in Wales²⁷ states that formal evaluation mechanisms must be specified and built into design and delivery of services from the outset. The new strategy should be accompanied by a monitorable

²⁵ Welsh Women's Aid, Women's Aid Federation Northern Ireland, Scottish Women's Aid, and Women's Aid Federation England

²⁶ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/Research-Integrity-Framework-RIF-on-Domestic-Violence-and-Abuse-DVA-November-2020.pdf>

²⁷ <https://gov.wales/sites/default/files/publications/2019-05/statutory-guidance-for-the-commissioning-of-vawdasv-services-in-wales.pdf>

delivery plan, which is clear on what these monitoring parameters are and set expectations for commissioning which complement the National Quality Service Standards.²⁸

The national indicators published by the Welsh Government were the first stage indicators. Development work took place during 2019-2020 with stakeholders to build upon the indicators, measures and data sources, however the outcome of this work has yet to be published. Further work is required to create data that is relevant for Wales, particularly collected from public bodies, such as health services and local authority housing and education as well as effectively utilising the data provided by specialist sector. At present there is no clear baseline to measure the impact of the Act or accompanying national strategies. Reliance on criminal justice data alone does not give a true picture of prevalence or positive outcome. It must be ensured that national indicators set out to measure impact by all bodies covered by the duty and cover all forms of VAWDASV. Data should be sourced from a broad range of sources.

Recommendations

- Developing and implementing the new national strategy across all government departments including setting out how the government will deliver the Istanbul Convention state obligations that are relevant to its competencies. Monitoring of indicators should align to these commitments.
- The development and implementation of a new national framework with survivors and the specialist sector as key delivery partners to ensure accountable and informed monitoring of the national strategy delivery.
- Refresh the National Indicators to reflect all VAWDASV and draw in data from a range of sources. The National Indicators should align to the commitment to a public health model focused on measuring the effectiveness of the strategy in centring prevention and early intervention.

Essential Evidence

1. [State of the Sector: Time to Act on sustainability](#)
2. [A Blueprint for Prevention](#)
3. [COVID-19 Briefing: Recommendations for short medium and long-term](#)

²⁸ <https://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>



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4. [Research integrity framework on Domestic Abuse and Violence](#)
5. [Supporting women exploited through the sex industry during the COVID-19 pandemic and beyond](#)
6. [Supporting disabled people experiencing violence against women, domestic abuse and sexual violence in Wales](#)
7. [No recourse to public funds: No woman or child turned away](#)
8. [Rurality and VAWDASV](#)
9. [Cheques and Balances: The Economics of Abuse](#)
10. [Children Matter: Children and Young People experience violence and abuse too'](#)
11. ['I Trust Them' Children and Young Peoples sources of resilience across communities](#)
12. [National Quality Service Standards](#)
13. [No Grey Are: Sexual Harassment in the Workplace in Wales](#)
14. [Research Integrity Framework for Domestic Violence and Abuse](#)
15. [Online Abuse: The use of the digital world to perpetrate VAWDASV](#)
16. [Change that Lasts: Interim Evaluation](#)
17. [VAWG Principles for the Online Safety Bill](#)

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