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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>

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).¹ These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse, 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 direct services including, for example, the Welsh Government funded Live Fear Free Helpline and a National Training Service partnership. We are piloting the Survivors Empowering and

¹ Our membership of 22 third sector violence against women, domestic abuse and sexual violence specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated includes: Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Clwyd Alyn Housing Association (CAHA) Women's Aid, Stepping Stones, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU), Gorwel (Grwp Cynefin), Montgomeryshire Family Crisis Centre, Newport Women's Aid, North Denbighshire Domestic Abuse Service, Port Talbot & Afan Women's Aid, RCT Women's Aid, Safer Wales (including Dyn Project), Swansea Women's Aid, Threshold, West Wales Domestic Abuse Service and Rape and Sexual Abuse Support Centre (RASASC) North Wales.

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Educating Services (SEEds) project, which is empowering survivors of violence and abuse to collectively influence and inform improvements in public services and commissioning frameworks, and help change attitudes.

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/>)

Welsh Women's Aid response to Welsh Government Strategic Equality Objectives 2020 - 2024

1. Do you agree with the proposed draft Equality Objectives in Chapter 5?

Welsh Women's Aid is concerned that the draft equality objectives do not speak to the impact of violence against women, domestic abuse and sexual violence (VAWDASV) on inequality. While we welcome a specific objective focused on Wales becoming a leader for gender equality, we feel more needs to be included about how Welsh Government will work to tackle VAWDASV and how these objectives will align with the national VAWDASV indicators. We also feel VAWDASV should be explicitly named in other objectives, namely Aim 5 – 'Elimination of identity-based abuse, harassment, hate crime and bullying' as social control of women is a driver to harassment.

2. Do you think there are any areas of inequality that are not addressed by draft Equality Objectives and that are of particular importance to you?

We are concerned VAWDASV is not explicitly named within the objective on gender equality or indeed across any of the objectives. As we pointed out in our response to the Welsh Government '[Measuring a Nations Progress](#)' consultation, Welsh Women's Aid recommends weaving the importance of and specifically naming VAWDASV throughout objectives to improve equality; as VAWDASV impacts across policy areas and is a significant barrier to women achieving an equal footing with men and having the opportunity to prosper.

We note the Gender Equality Review report will be used as a measure for Objective 4 'Wales is a world leader for gender equality', however we are concerned the VAWDASV section in the accompanying roadmap to the Gender Equality Review, does not cover the breadth of area where increased funding and support is needed for the specialist VAWDASV sector. More is needed on early intervention and prevention work with regards to VAWDASV including the

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Change That Last's model from Welsh Women's Aid² which works with communities to empower them to identify abuse at an earlier stage, as well as dedicated, specialist work with children survivors of VAWDASV; Welsh Women's Aid has been campaigning on the need for secure and sustainable funding for children's workers in refuge and the community. More is also needed in terms of the role of education in the early identification of VAWDASV. In our response to the [Draft National VAWDASV Indicators](#) consultation we recommended data collection linked to the delivery of sex and relationship education resources as well as an expectation on schools to evidence their approach to gender equality and SRE.

We welcome Welsh Government's commitment to become a nation of sanctuary and note in the [Nation of Sanctuary Plan](#), support for women impacted by VAWDASV. However, it does not address the huge barrier to accessing support that women with no recourse to public funds face; namely that many specialist services do not have the resources to support women who cannot access public funds, particularly refuge spaces as they rely on housing benefit to fund the space. While we appreciate welfare entitlement is reserved to UK Government, we call on Welsh Government to consider what funding can be made available to the specialist VAWDASV sector to enable them to support women fleeing abuse with NRPFs. We don't feel Welsh Government can claim to be a nation of sanctuary for asylum seekers and refugees if women living with abuse and violence are prevented from accessing the life saving support they need.

With regards to Aim 5, 'Elimination of identity-based abuse, harassment, hate crime and bullying' VAWDASV should be specifically named as a driver to these abuses, particularly harassment. This Aim does not include any detail on a planned preventative/early intervention agenda, rather just focuses on ensuring access to support. Of course, anyone impacted by hate crime and harassment needs access to specialist support, but more needs to be done to address the causes of these crimes and prevent them from happening in the first place. Finally, in terms of monitoring of reporting, we feel data from the Live Fear Free helpline should also be included.

The response to and commitment to eradicating VAWDASV must be far more prominent in the work to address inequality as access to an equal sharing of power, resources and influence is severely hindered by these abuses.

3. Are there any emerging trends/issues/evidence regarding inequality in Wales that you feel should be addressed as a priority?

Welsh Women's Aid is concerned about the impact of Brexit on women, in terms of loss of funding for vital services that women access, the detrimental impact Brexit will have on women's economic prosperity and in particular the impact on EU women's access to public

² <https://www.welshwomensaid.org.uk/what-we-do/change-that-lasts/>

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services and funds. Welsh Women's Aid is concerned that EU migrant women may find their rights restricted and removed post-Brexit as well as facing restrictions on the application process for 'settled status'. Women impacted by VAWDASV are at greater risk of failing to access their settled status in the context of coercive control, forced marriage and so-called honour based violence, where perpetrators can further their oppression by preventing women from proving their residency and using their immigration status to further control and isolate. This will exacerbate the concerns Welsh Women's Aid already has about the status of women from outside the EU, who have no recourse to public funds.

The EU has been instrumental in progressing protections for women. We are concerned that leaving the EU will lead to a regression of those rights and protections and Welsh Women's Aid urges Welsh Government to outline their plan to protect women against these negative implications

We welcome Welsh Government's commitment to strengthening equality and human rights in Wales post Brexit, in particular a focus on introducing the various UN Conventions into Welsh law and consideration of a Human Rights Bill for Wales. We want the impact on women and survivors of VAWDASV to be seen as a priority group to consider in this process and reiterate our call for Welsh Government to create a fund that the specialist sector can access to support all women with insecure immigration subject to violence and abuse.

4. What are your thoughts regarding the approach of developing Equality Objectives that contribute to longer term, aspirational aims?

While we appreciate that this is a long-term process, we feel the pace of change has been too slow, particularly towards eradicating VAWDASV which is a cause and consequence of gender inequality. We agree there should be 'shared action to advance equality and human rights in Wales' as a whole system approach is essential to achieving equality, but feel a stronger commitment is needed from Welsh Government, than 'aspirational aims' and there must also be a practical commitment to work towards them. Welsh Government should consider what resource and capacity is available to them to achieve the 'aspirational aims' and look at how they can best work with specific expertise and grassroots knowledge to inform this, such as Welsh Women's Aid in the context of VAWDASV. For example, Welsh Government has made a commitment to implement the Istanbul Convention, but this will remain aspirational unless they work with Welsh Women's Aid and the specialist sector to achieve this.

5. Do you agree with the intended approach to develop a small number of key actions under each Objective, linked to the 6 domains in Is Wales Fairer? 2018, as exemplars to demonstrate how the objectives will be achieved?

Welsh Women's Aid recognises the importance of keeping the number of actions at an attainable number, however is concerned that there will not be specific actions relating to

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VAWDASV as the current objectives do not name it (and we have not had sight of the actions yet). Actions to address VAWDASV should be considered across the objectives as so many of them can be impacted by VAWDASV; for example, in terms of improving poverty outcomes, VAWDASV can maintain a status of poverty for women and children, particularly making it difficult to move on from abuse, with welfare benefits and universal credit in particular acting as an enabler for economic abuse; clearly it is a violation of human rights and happens to women and girls, because they are women and girls and participation in political, public and everyday life can be impacted by violence and abuse in the context of coercive control or because of the ongoing impact of trauma of living with or experiencing violence and abuse.

The 'Is Wales Fairer' report names the urgent need to improve women and girls experiences and the role harassment and domestic abuse plays as a barrier to women working. In its recommendations, it calls for the full implementation of the VAWDASV Act and VAWDASV strategy, appropriate prevention programmes and timely support for all survivors³. Clearly directly naming and addressing VAWDASV are essential to achieve better equality outcomes in Wales.

We welcome Welsh Government plans to introduce a socio-economic duty and urge them to consider how economic disadvantage intersects with poor well-being. Certain cohorts of people are more likely to live in and be unable to escape poverty such as women who face multiple disadvantage who in turn are more likely to have suffered violence and abuse than women not in poverty. Of course, some women are more likely to be in poverty, including minoritised women, disabled and/or LGBT women. Additionally, we know financial hardship is common for women post-separation with many women accessing refuge unable to work, often having to leave employment to move away to a safe place and access housing benefit to cover the rent in refuge.

6. Do you agree with the intention to continue to align Equality and Inclusion funding with the Strategic Equality Objectives?

While we feel it makes sense to align the funding with the Strategic Equality Objectives, the objectives need to be strengthened to ensure the work under them actively addresses inequalities and prevents those inequalities for future generations. We also echo WEN Wales' point that while the objectives focus on long-term, aspirational goals, the Equality and Inclusion Grant period is relatively brief and therefore goals and objectives for the grant should be short-to-medium term goals that align with the overall Strategic Equalities Objectives. We are also clear that there is a body of work to address equality and inclusion which sits outside of the Equality and Inclusion Fund. Such as work carried out by Welsh Women's Aid and specialist VAWDASV services who are funded via other streams.

³ Is Wales Fairer? Equality and Human Rights Commission
<https://www.equalityhumanrights.com/sites/default/files/is-britain-fairer-2018-is-wales-fairer.pdf> page 135

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7. We would like to know your views on the effects that the proposed Strategic Equality Objectives would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating Welsh no less favourably than English. What effects do you think that would be? How might we build momentum and increase any positive impact on these effects, or where do you think there might be negative effects, what can we do to mitigate them?

In terms of the three main elements set out in chapter 5, Welsh Women's Aid suggests clarity is needed on where the Welsh language would stand in the Long-term Aims. For example, third and private sector organisations may not be held to the same standards as the aims are 'offered as a model which other organisations may wish to adopt'.

When considering overlapping protected characteristics and developing objectives which are intersectional, it is important to ensure Welsh speakers are included in this model and that support, and information is provided in people's preferred language.

8. Please also explain how you believe the proposed Strategic Equality Objectives could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

In terms of the objectives under the Long-term Aims, we recommend considering the following;

- Long-term Aim 1; There may be additional barriers in areas where there are higher proportions of Welsh speakers in the local population, compounded with rurality and the difficulty in accessing more remote areas.
- Long-term Aim 5: Ensure reporting routes have Welsh Language options for all types of harassment and hate crime.
- Long-term Aim 6: Care needs to be taken here to ensure that Welsh is treated equally with English in this aim to bring communities together. There must be provisions for Welsh speaking groups to provide feedback and input through Welsh.

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