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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>

Welsh Women's Aid response to Welsh Government Code of Practice in relation to measuring Social Services performance

Background: 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

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

Response to consultation:

Our response to Welsh Government's *Code of Practice in relation to measuring Social Services performance* focusses on the importance of embedding a response to violence against women, domestic abuse and sexual violence (VAWDASV) across the Code of Practice, specifically the statutory duties enshrined in law and good practice.

We welcome the opportunity this consultation presents to review the 2016 Performance Measurement Framework for Local Authorities, because feedback from local authorities and other partners regarding the quality of the submitted data has demonstrated that the current model for the framework is not working as intended and requires refining.

We note that consultative workshops suggested that a wider and more comprehensive Performance and Improvement Framework should be developed and should be linked to the Well-being of Future Generations (Wales) Act 2015 as well as the Social Services and Well-being (Wales) Act 2014. **We would add that this must also link to the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, to be effective.**

The accompanying **Quality Standards**, which set out the requirements that local authorities must undertake in relation to the Social Services and Well-being (Wales) Act 2014 Act, **must also reflect the local authorities' statutory duties to provide support and instigate protective mechanisms in response to VAWDASV, and also ensure they take steps to prevent violence against women and girls in all that they do.**

The duties under the VAWDASV (Wales) Act place specific statutory duties on local authorities to prevent and respond to violence against women and so **this should be explicitly cross-referenced throughout the Code of Practice**; delivery of the parallel legislation requirements should not be operating in silos.

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For example, domestic abuse is often conflated with “elder abuse” or as being caused by the pressures of caring. The Solace Women’s Aid Silver Project has found some agencies lack clarity between domestic abuse and other forms of violence against women and elder abuse². Sexual violence significantly impacts a person’s mental ill health, yet this is rarely identified as the cause of someone’s support needs within social care settings. A focus solely on ‘elder abuse’ or other forms of neglect can lead to a gender-blind response and relies on a narrow definition of violence, not recognising the dynamics of gender and power which plays out with VAWDASV. Practice can then risk focusing solely on medical and social care needs rather than the specific experiences of domestic abuse, forced marriage, rape or sexual violence, stalking or harassment, so-called ‘honour-based’ violence, and their need for effective specialist advocacy, safety planning, and trauma-informed and strengths-based support from specialist services.

We urge Welsh Government to ***ensure the Code of Practice and resultant data and reporting requirements incorporate local authorities’ duties to ‘ask and act’ in response to VAWDASV, and to implement the statutory VAWDASV National Training Framework.*** We know the cohort of people accessing adult social care are also impacted by VAWDASV. Disabled women experience disproportionately higher rates of abuse than non-disabled people³ and the Older People’s Commissioner for Wales has estimated that over 40,000 older people in Wales are abused in their own home every year⁴. Correctly identifying VAWDASV, where there are additional social care needs, is a statutory requirement for local authorities. This will help services to focus on the nature of the relationship between the survivor and the abuser and the risks associated with this, rather than the abused person’s age and/or physical or mental capacity. The Dewis Project⁵ for example, notes this is important as the motivations of a perpetrator of violence in the context of coercive control will be different⁶ to a person neglecting someone they care for, perhaps in an institutional setting. In the context of violence and abuse the perpetrator will commonly use strategies of coercive control, whereas this may be less apparent where abusive behaviour is a consequence of unintentional neglect.

Welsh Government should specifically name VAWDASV within the Code of Practice:

Within the Quality Standards, we welcome the commitment to *‘people being protected and safeguarded from abuse and other types of harm’*, but this needs to be clarified further to

² Solace Women’s Aid – Silver Project – <https://avaproject.org.uk/wp/wp-content/uploads/2016/12/Solace-Womens-Aid-Silver-Project-Findings-Older-Women-Experiencing-Domestic-Violence-Sexual-Abuse-.pdf>

³ Welsh Women’s Aid and Disability Wales <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/04/WWA-and-Disability-Wales-2019-report-Final-ENG.pdf> page 7

⁴ ‘Domestic abuse and sexual violence: Help and Support for Older People in Wales, Older People’s Commissioner for Wales http://www.olderpeoplewales.com/Libraries/Uploads/DVSA_Leaflet_-_Welsh_2016.sflb.ashx

⁵ Dewis Project is a community-led project addressing conflict and difficulties that people aged 60 years and over face within their relationships with friends, family and intimate partners,

⁶ Dewis Project - <https://academic.oup.com/bjsw/article/48/4/962/5059565?searchresult=1>

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ensure local authorities fulfil their duties to ask and act about VAWDASV experienced by survivors. The risk of not explicitly identifying and responding to VAWDASV are clear; the most recent UK Femicide Census found 20 women killed by men in 2017 were women over 66⁷, the report also found that sons are more likely to kill their mothers, with sons exceeding partners as primary perpetrators for this age category.

Within the Quality Standards, we would also expect recognition that perpetrators may be accessing social care support themselves for their own vulnerabilities or as carers of the person they are abusing. It is important for the Code of Practice to reflect how support can be safely provided to both, without compromising the safety of the victim/survivor, and that appropriate interventions to challenge and address the perpetrators' behaviour is integrated into local authorities' standards. Survivors need to be given opportunities to disclose abuse confidentially, and professionals must be equipped to distinguish between VAWDASV, its cause and consequences, and whether abuse is associated with symptoms of mental ill health or dementia, for example.

The Code of Practice notes '*a prudent approach to resource allocation ensures the right help is available at the right time*', we would urge allocation of those resources to support practitioners to recognise the early warning signs of VAWDASV and prevent 'escalation of need'.

For example, the Change That Lasts⁸ model, demonstrates both the human and monetary value of early intervention in cases of violence against women, and is based on our decades of experience that women often do not get the right response the first time they disclose. Therefore, ensuring practitioners are equipped to respond appropriately at the first point of contact can be beneficial to the social care sector as well as the individual.

Welsh Women's Aid is also concerned that the guidance suggests '*local authorities should also commission or undertake their own research in the areas that are most important to them*'. This can further exacerbate the lack of consistency that survivors across Wales face from public and statutory services. We urge Welsh Government to ensure all local authorities prioritise VAWDASV statutory duties, recognising the number of people using social care services who are subject to coercive control, sexual violence and other forms of violence against women.

Welsh Women's Aid would like to thank Welsh Government for the opportunity to provide feedback on this important issue. We would also be happy to provide further oral or written evidence, if required.

⁷ The Femicide Census, Dr Julia Long, Keshia Harper, Heather Harvey <https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2018/12/Femicide-Census-of-2017.pdf>, page 28

⁸ <https://www.welshwomensaid.org.uk/what-we-do/change-that-lasts/>

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

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