

Consultation questions

Introduction

Welsh Women's Aid have been working for the past year to inform the development of this strategy refresh, considering achievements since implementation of the Violence Against Women Domestic Abuse and Sexual Violence (VAWDASV) (Wales) Act 2015 and laying out our key priorities for ensuring all survivors of VAWDASV are protected. There are many welcome elements of the draft strategy, our response works to strengthen areas of priority whilst also addressing gaps.

Throughout January we have held workshops with the survivor network, specialist services and our wider networks to help inform this response. These workshops saw good attendance and a wide variety of ideas and concerns were shared.

Through our response, we have aimed to think about how this document will work cohesively across different agencies, how it could most effectively inform the commissioning and delivery of services, as well as reach the objective of preventing further violence and abuse and ending VAWDASV in Wales.

Appropriately Resourced Vs. Sustainable Funding

The strategy refresh in its current form does not meaningfully reflect, nor build on the work of the previous five years under the 2016-21 strategy. We have serious concerns that the commitment to developing a sustainable funding model for the delivery of specialist services has been removed entirely. The shift in language to 'appropriately resourced' has been raised as an issue countless times during strategy review workshops from specialist services providers and survivors alike.

We were pleased that our most recent membership survey demonstrated that most services feel confident they are resourced to deliver their current level of services this year. However, the consistent feedback we get from our regular membership meetings is that funding provided covers only existing duties, often restricted to a fixed number of survivor support sessions for an individual leaving no flexibility for emergencies, unexpected rise in demand, staff shortages, or a need to be flexible in offering support.

That is the most glaring issue when thinking about 'appropriately resourced' versus 'sustainably funded'. The current funding circumstances are not meeting the current level of need. Our annual data shows that there were increases in the number of survivors unable to be supported across services, due to a lack of capacity and resources. When examining current resources, specialist services are not equipped to support the increase in survivors facing multiple disadvantages who are seeking support. There is a particular issue, which we have raised previously, about a lack of funding streams for specialist children and young people support, leading to significant gaps in provision across Wales.

The draft strategy does not give any indication as to reasoning or evidencing behind Welsh Government's decision to this change, it also makes no mention of the work of sustainable funding working group, chaired by the National VAWDASV Advisors, which has spent significant time gathering evidence, mapping provision, and developing a workable model for implementation. This is just one area where the strategy falls short by not acknowledging the work and learning of the last five years, and by not taking the opportunity to build on success or evidence reasoning behind a change in direction.

Question 1

We have set out our main priorities in the [Objectives](#). Do you think these are the right priorities?

~~Yes/No~~ **Partially**

Please give reasons for your answer:

We broadly agree with the objectives set out in the draft strategy, with some suggested edits and editions.

It is worth noting that **Objectives 1 and 2** are very closely aligned and could potentially be combined into a single objective to avoid duplication of work.

- **Suggested rewording** – *Challenge the public attitude towards violence against women, domestic abuse and sexual violence across the Welsh population through awareness raising, actively creating space for public discussion and increasing awareness in children, young people and adults of the importance of safe, equal and healthy relationships, with the aim to decrease its occurrence.*

We have some concerns around the language used in **Objective 3**. The term 'those who carry out abuse' as opposed to 'perpetrator' notes a significant shift in language and representation of who should be held accountable for the perpetration of VAWDASV. There is an inconsistency of terminology regarding the perpetration of abuse throughout the document. As well as this, the end of the objective which makes reference to 'avoid offending' is problematic along with 'increase focus' most perpetration is sub criminal behaviour so language such as 'avoid offending' carries a risk of conveying sentiments such as 'don't get caught perpetrating abuse' and not to 'perpetrate a crime'. We have provided suggested rewording of this objective which focuses more on a person not being abusive or use harmful behaviour altogether.

As the National Strategy document the language needs to be clear on holding perpetrators of abuse to account. Clear language on who perpetrates and those who are harmed enables clear understanding.

The language must not allow for the minimisation, denial or excusing of the perpetration of abuse. Being clear on the perpetration of abuse and who is committing it is vital in challenging the societal attitudes that minimise, excuse or

deny abuse. Similarly, this allows for perpetrators of abuse to also utilise this as a means of the minimisation, denial or excuse and continue their abuse. Finally, if this strategy is to work in alignment with non-devolved agencies such as CPS, police, probation and the UK government VAWG and DA strategies, it is important to align language. This should be done by retaining the language of ‘perpetrator/perpetration of abuse’ in the strategy and associated areas of work.

- **Suggested rewording:** *Increase the focus on holding perpetrators to account and supporting those who may carry out abusive or violent behaviour to stop using harmful behaviours.*

As much of the draft strategy interlinked and heavily rooted in delivering on prevention, we would suggest that **Objective 4** is the overarching commitment and purpose of the whole strategy.

As per the detail we gave in our introduction, we have serious concerns with use in **Objective 6** of ‘appropriately resourced’ as opposed to ‘sustainably funded’ when ensuring services have the capacity to provide support for all survivors and all needs. This, as we mentioned, is most starkly represented by our membership statistics which show that though most services felt they were adequately resourced to deliver their current level of services this year, there was a dramatic increase in the number of survivors with additional needs who couldn’t be supported by services due to a lack of sustainability.¹

There was also a significant increase in the following reasons for refusal from refuge over the previous financial year:

- Unable to meet support needs (around drug and alcohol) (27%)
- Unable to meet support needs (around mental health) (61%)
- Unsafe (perpetrator knows the location of the survivor/ refuge) (92%)
- No/ limited recourse to public funds (29%)

- **Suggested rewording:** *Provide all victims with equal access to sustainably funded, high quality, needs-led, strength-based, trauma informed, inter-sectional and responsive services across Wales.*

To better reflect the workstreams suggested in the blueprint, we feel the draft strategy would benefit from an **additional objective** which would also re-state commitment from Welsh Government to the equity of all forms of VAWDASV.

- **Suggested wording:** Recognise the multiple harms of all forms of VAWDASV (including so-called HBV, FGM, rape, and sexual exploitation) and

¹ <https://www.welshwomensaid.org.uk/2021/10/a-strategy-for-sustainable-support-state-of-the-sector-2021-published/>

ensure proportionate and equal representation and resources across all policy and practice.

Significant Welsh Government funded evidence has been provided by specialist services and survivors over the last five years that is not currently reflected in strategy. The sector has provided significant input into national indicators, sustainable funding models, has met service standards to prove their quality of provision and provided researched reports outlining prevention models, needs of children and young people, needs of survivors with disabilities, and the current impact of funding on provision. None of which is referenced within the strategy and none of the learning from this evidence appears to have been utilised. Furthermore, significant collaborative work between specialist services and statutory organisations (devolved & non devolved) has taken place in last 5 years as a direct result of the first strategy, such as regional partnership boards, regional advisors & joint commissioning activities. Without reference to the progress so far and any lessons learned this current strategy draft fails to use significant evidence which underpins the strategy.

To inform the last strategy a series of consultations across Wales with a diverse group of survivors was carried out and provided ten recommendations from survivors to inform the strategy. We strongly recommend that these recommendations should be reviewed with survivors to see if they have been met or are still relevant to inform the new strategy. There remains significant lack of clarity, despite a welcome commitment, as to how survivors' voices will be central to the development, delivery and monitoring of the strategy. Welsh Women's Aid have provided specific evidence and briefings (Appendix A) across both the previous five years and in the lead up to the development of this strategy refresh.

Question 2

Do you think the overall approach we will be taking, as set out in the sections on the [Blueprint](#), is the right one to stop violence against women, domestic abuse and sexual violence?

Yes/No

Please give reasons for your answer:

It is vital that Welsh Government has clear ownership over this blueprint and ensure equity of representation across agencies. We are in strong agreement that all departments, agencies, specialists and survivors who are experts in their own experiences, have an equal voice in the development and implementation of the blueprint. However strong leadership will be needed from Welsh Government for this process to remain equal and ensure no single agency holds responsibility for ending VAWDASV and all agencies recognise their part and participate fully in the development of the blueprint.

Strategic Planning Vs Reactionary actions

We have had a strategy for the last five years. How does this blueprint build on the successes and of the last five years and work to progress work in areas which are still underdeveloped? The blueprint must have strategic goals, feel reflective of the situation in Wales as and not be simply reactive to UK national media narratives.

We are aware that there have been several high profile and deeply upsetting instances of violence against women and femicide which has sparked public debate on women's safety in public areas. This absolutely must be addressed through the strategy but in a way which makes sense in a Welsh context and utilises the strides made in preventative work over the last five years. When considering specific workstreams of the blueprint, to achieve the objectives there must also be given specific space to issues surrounding children and young people, as well as older people. In Wales specialist services have particular issues resourcing to meet the needs of children and young people across local authorities. A large proportion of femicides in Wales are elderly women. This strategy should be taking into account the specific issues and dangers that face women in Wales and working strategically to address them.

We have also noted a concerning overall shift in discussion from prevention to a more criminal justice approach. Whilst ending violence in Wales will take cooperation from all public bodies, this must be with an emphasis on prevention, and resourcing specialist VAWDASV services to lead with their expertise.

This strategy must recognise that ad hoc campaigns or information days are not sufficient to change sexist attitudes and harmful gendered norms which underpin VAWDASV, nor the persisting unequal distribution of political, social and economic power and resources between men and women – all of which are the legacy of centuries of inequality and intersecting discrimination and oppressive regimes. The blueprint presents an opportunity to turn intention to action and for this reason must be based on a robust strategic vision.

Messages around gender equality and the unacceptability of VAWDASV need to be reinforced time and again in as many different spheres of life as possible and must be consolidated by structural changes within public institutions. At the same time, we must ensure that the infrastructure and services required for responding to and supporting survivors, as well as holding perpetrators to account, are adequate.

The proposed blueprint priority areas do not match up with the reality of survivor or sector experiences. They are also not strategically linked as to how this blueprint will deliver on the six outlined objectives. They do not provide an overarching response to VAWDASV or pillars to take forward action across all forms of VAWDASV. It runs the risk of unintentionally siloing work and not creating a whole systems approach, which is the overarching goal.

Suggested pillars for the blueprint/strategy:

Create the environment to enable prevention, protection and support:

1. Governance, coordination and system development: Strengthen governance arrangements, collaboration and coordination across government, local authority, health boards, criminal and family justice and specialist sector agendas.
2. Workforce and sector development: Build the capability, career pathways, health and wellbeing of the workforce to support the scale-up of prevention, protection and support activity across all sectors in Wales.
3. Build knowledge: Undertake comprehensive research and evidence-informed pilots to inform policy and improve understanding of the drivers and reinforcing factors of VAWDASV.
4. Monitor and share outcomes: Build a strategic, robust and transparent approach to how we monitor, evaluate and report on progress.
5. Sustainable invest in a whole systems approach: Strengthen joined up commissioning and grow awareness across funding streams of their relevance to VAWDASV responses and the impact of these investments.

Carry out actions to prevent, protect and support:

6. Community engagement and awareness: Build community engagement and awareness about the drivers of all forms of violence against women, and support behaviour change to prevent VAWDASV.
7. Partnerships and advocacy: Strengthen existing partnerships and develop new partnerships across government, community organisations and industry sectors to influence positive change, amplify impact and prioritise prevention.
8. Tailored approaches for diverse community groups: Strengthen intersectional approaches across prevention, protection and support system.
9. Testing new and innovative approaches: Work with sector experts and researchers to design, test and evaluate new approaches to prevention, protection and support, including activities that engage a diversity of survivors (including CYP).
10. Scale up prevention and early intervention: Scale up prevention and early intervention activity, such as Ask and Act, across a broad range of environments to reach people where they live, work, learn and play.

These are adapted from a good practice example of a strategy and action plan available here: <https://www.vic.gov.au/free-violence-victorias-strategy-prevent-family-violence>

We welcome the inclusion in the strategy to strengthen work to end violence against women in the street and workplace as well as the home. We would welcome Welsh Government's perspective on the new legal duty on employers to protect employees from sexual harassment in the workplace announced in the recent UK Government VAWG strategy.

We have been working on our No Grey Area campaign on SH in the workplace and would be more than happy to share data and learning in order to help shape how this

duty can be best delivered in a Welsh context. The strategy is a prime place to illustrate this new duty.

The No Grey Area report² provides the only Welsh specific data on SH in the workplace. We have also produced data on LGBTQ+ experience³ of SH in the workplace and are carrying out focus groups with Race Equality First and Disability Wales in Sept/Oct to gather further data on the intersectional experiences of SH in the workplace. We will share the findings from these with WG.

Question 3

We have set out the principles which underpin the draft [National Strategy](#). Do you agree with these?

~~Yes/No~~ **Partially**

Please give reasons for your answer:

Whilst we do agree broadly with principles outlined in the strategy in building a strategy in general we also feel they fall short in capturing the specialisms of delivering a strategy on ending VAWDASV in Wales. We have developed (and sense checked with survivors and specialist services) 10 key principles that both capture the principles already outlined in the consultation draft whilst building in some of this nuance and a specialist approach that will be absolutely vital to creating and implementing an effective strategy and meeting the outlined objectives.

These include:

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.

² <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/06/I-trust-them-CYP-Resilience-Survey-Report-English-1.pdf>

³ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/06/No-Grey-Area-LGBTQ-women-and-sexual-harassment-at-work.pdf>

10. Utilise robust evidence base and clearly set out mechanisms for monitoring accountability and delivery.

1. Governance, Leadership and Oversight:

While we recognise and welcome that the delivery of the strategy will be carried out in collaboration, at present the draft does not provide the direction to engage the relevant stakeholders or provide the clarity as to how this will be carried out. Without this there is no means to measure whether the collaboration is happening at a national or regional level and if it is being effective. Learning from the last strategy has shown that without the clear guidance and instruction from Welsh Government there has been disparity as to how stakeholders, particularly across government departments, local authorities and health boards have engaged with the delivery of their duties under the VAWDASV (Wales) Act 2015. This has led to continued regional and sector discrepancies in the effectiveness of collaborative working. This strategy does not set out with clarity what it is asking

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, 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. Furthermore WG should be drawing on evidence of good practice from regions, to enable a stronger more cohesive approach across all Wales.

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

- Ensure a national strategy and delivery plan (blueprint) 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.
- 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.⁴

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 face oppression or abuse 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,

⁴ <https://gov.wales/violence-against-women-domestic-abuse-and-sexual-violence-guidance-local-strategies>

Deaf and disabled women, LGBT+ survivors and women facing multiple forms of disadvantage must be recognised, addressed and 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 refuges 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. 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 commit to leading the way on implementing Article 4 of the Istanbul Convention through providing a commitment to support survivors with NRPF within its new strategy'.

In our joint report with Disability Wales⁵ 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 (UNCPRD) 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,⁶ 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.
- 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,

⁵ <https://www.welshomensaid.org.uk/wp-content/uploads/2019/04/WWA-and-Disability-Wales-2019-report-Final-ENG.pdf>

⁶ 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.

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 report⁷ *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 accurately evaluate if we are effectively investing to achieve the common goal of eradicating VAWDASV.

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.⁸

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

⁷ <https://www.audit.wales/publication/progress-implementing-violence-against-women-domestic-abuse-and-sexual-violence-act>

⁸ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/04/WWA-and-Disability-Wales-2019-report-Final-ENG.pdf>

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.⁹

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.¹⁰ 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.¹¹

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. Welsh Women's Aid were pleased to note that the VAWDASV consultation for CYP has a later closing date, allowing specialists within CYP field and YP themselves to comment on the strategy.

⁹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/11/Children-and-Young-People-participation-report-FINAL.pdf>

¹⁰ https://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/Are_you_listening_and_am_I_being_heard_FINAL_July_2016.pdf

¹¹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/10/WWA-2019-24-Strat-Landscape-EN-DigiVersion-HighRes.pdf>

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.
- 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.¹² This recognises the intersection of factors occurring at the societal, community, relationship and individual levels which increase the likelihood of VAWDASV.¹³ Applying a public health approach to VAWDASV requires implementing three types of prevention interventions: primary, secondary, and tertiary prevention across all these levels.¹⁴

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.

¹² <https://www.who.int/news-room/fact-sheets/detail/violence-against-women>

¹³ 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>

¹⁴ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/12/A-Blueprint-for-the-Prevention-of-VAWDASV27918.pdf>

- Include the co-production of long term public health campaigns aimed at challenging and changing attitudes, align these to community training programmes.

6. Specialist ‘By and For’ provision:

‘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’:¹⁵ the issues to be dealt with are never just about VAWDASV, intersecting with racism, immigration, poverty and community. This has not been effectively reflected in funding frameworks to date. 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.¹⁶

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 LGBTQ+ community across Wales. Commissioning of these services is essential to ensuring all survivors have the access to safety and support they deserve.
- Include commissioning and diversity of funding streams that address the full range of needs of deaf and disabled survivors of violence against women, domestic abuse and sexual violence.
- Ensure core provision and delivery of accessible specialist services is sustained and funded at a national level.

¹⁵ https://www.tavinstitute.org/wp-content/uploads/2020/03/Safer-Pair-of-Hands-Report_Final-Published.pdf

¹⁶ 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 Lasts¹⁷ 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.¹⁸

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.
- 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

¹⁷ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/10/Change-That-Lasts-Evaluation.pdf>

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

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 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 technology facilitated 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.¹⁹

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.²⁰ The vast majority of women who responded to the survey experienced harassment

¹⁹ <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/VAWG-Principles-for-the-Online-Safety-Bill-150921.pdf>

²⁰ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/03/No-Grey-Area-Survey-Report-ENG.pdf>

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 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.²¹

²¹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/06/I-trust-them-CYP-Resilience-Survey-Report-English-1.pdf>

The 'I Trust Them' Report 2021²² 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 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.²³

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

²² Ibid

²³ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/11/Children-and-Young-People-participation-report-FINAL.pdf>

- 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.

10. 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 federations²⁴ in the UK have recently developed a Research Integrity Framework (RIF) on Domestic Violence and Abuse²⁵ (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 Wales²⁶ 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 delivery plan, which is clear on what these monitoring parameters are and set expectations for commissioning which complement the National Quality Service Standards.²⁷

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

²⁴ Welsh Women's Aid, Women's Aid Federation Northern Ireland, Scottish Women's Aid, and Women's Aid Federation England

²⁵ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/Research-Integrity-Framework-RIF-on-Domestic-Violence-and-Abuse-DVA-November-2020.pdf>

²⁶ <https://gov.wales/sites/default/files/publications/2019-05/statutory-guidance-for-the-commissioning-of-vawdasv-services-in-wales.pdf>

²⁷ <https://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>

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.

Question 4

Do you agree with our [immediate priorities](#)?

Yes/No/ Partially

Please give reasons for your answer:

Two areas of work that have been effective, the development of a statutory commissioning guidance and the sectors work to meet relevant quality service standards are worryingly jeopardised by the potential proposed actions within the strategy.

The suggested review of the commissioning guidance (which has been an envy of services in England) could further push back the opportunity to ensure we have adequately funded services through a range of funding streams.

The suggested strategy framework needs a clarity in language to avoid duplication of the range of quality standards already being met by the sector and opening up opportunities for non-specialist services to compete for contracts. Welsh Perpetrator Standards developed as part of the previous VAWDASV strategy have not been supported robustly since development leading to a dilution of existing QA processes.

Suggested rewording:

Crucial to achieving our vision is well resourced, effective specialist service delivery. Whilst we should be responsive to local need, it is also important to ensure consistency across Wales. In order to achieve this we will be promoting the established National Quality Service Standards²⁸ (NQSS) which articulate what a good service offer looks like and the minimum service levels

²⁸ <https://www.welshwomensaid.org.uk/members-area/national-quality-service-standards-nqss/national-quality-service-standards-nqss/>

that should be expected. This will seek to ensure that the Welsh model of collaborative delivery could be embedded in comprehensive service offer meeting the needs of all. Driving the uptake of this framework would be a responsibility of the National Partnership Board and will rely on the commitment of all of the funding partners. Accreditation is conducted by Welsh Women's Aid. The NQSS is a part of supporting the sustainability of services and partners will have clear expectations for the commitment expected of them.

This is an area in the strategy where Welsh Government should showing leadership. A plethora of good guidance has been developed under the previous strategy in the last five years. This strategy should be directing local authorities and health boards towards this guidance as well as their legal duties under the VAWDASV (Wales) 2015 Act. All agencies should be encouraged to implement this guidance, and the strategy should be outlining actions on exactly how to encourage this.

Question 5

What do you think is the most important thing we can do to stop violence against women, domestic abuse and sexual violence?

Prevention/ Public Health Response

Despite the welcome acknowledgements of the benefits of a public health response, and a commitment to embed this, much of the actions in the strategy focus on risk factors rather than setting out an ambition for a society that promotes women and girls' human rights to live free from abuse and thrive as equal members of communities.

Prevention should be driven by the desire to change harmful attitudes and beliefs which increase inequalities between men and women and creates a culture that does not adequately challenge abusive behaviour. This terminology allows for assumptions of 'bad apple' rather than recognising the context of norms, practices and structures which serve to normalise, legitimise or condone VAWDASV.

This requires a multi-level strategic response which recognises the intersection of these factors with other forms of oppression occurring at the societal, community, relationship and individual levels which increase the likelihood of VAWDASV. This is a public health approach to VAWDASV. We would recommend looking at WHO Respect Framework on a public health approach.²⁹

When consulting with the Survivor Network ahead of formulation our response, many women raised significant concerns on the strategy's definition of a Public Health, namely that focus on 'risk factors' would perpetuate unhelpful stereotypes of both perpetrators and survivors which can lead to difficulties in survivors being believed and getting access to the support and justice they're entitled to.

²⁹ <https://apps.who.int/iris/bitstream/handle/10665/312261/WHO-RHR-18.19-eng.pdf?ua=1>

The 'cycle of violence' is a significantly defunct theory. Most children who grow up in violent/abuse homes do not go on to commit domestic abuse, many are actually some of the most ardent advocates for change. Given the prevalence of VAWG in society, the majority of perpetrators will not have grown up within domestic abuse situations. This is also DA centric, as HBV, FGM and sexual exploitation and violence are also not committed due to a person's experience of trauma but are due to societal norms, beliefs and attitudes.

We do welcome the recognition of the impact of VAWG in children and young people and that without adequate and effective support the impact will be far reaching and wide-ranging casting a long shadow with inter-generational consequences, including physical and mental health and life achievements. The recent 'I Trust Them' report³⁰ clearly shows the differing reactions children and young people can have from violence and where they can gain resilience to overcome these experiences.

Adequate support for children and young people

We do welcome the recognition of the impact of VAWDASV on children and young people and that without adequate and effective support the impact will be far reaching and wide-ranging casting a long shadow with inter-generational consequences, including physical and mental health and life achievements. The recent 'I Trust Them' report³¹ clearly shows the differing reactions children and young people can have from violence and where they can gain resilience to overcome these experiences. This strategy needs to be strong in recognising children and young people as victims in their own right, as in the Domestic Abuse Act 2021.³²

A trauma informed response needs to also include a trauma informed response to adults who have/are experiencing abuse. This requires an early intervention approach that is needs led and strengths based. A trauma informed response to VAWDASV means moving away from a short term, risked based approach to looking to provide services that work to deliver longer-term recovery, empowerment and rebuild lives of both adults and children.

The sector is currently experience significant uncertainty in funding, impacting on staff retention and ability to meet increased need. This is particularly the case for CYP services, which are predominantly funded via trusts and foundations, in some areas there remains little to no specialist support for CYP affected by VAWDASV. At a time when RSE is about to be rolled out across the curriculum, this could lead to an increase in CYP coming forward with schools having no means to refer them to support.

³⁰ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/06/I-trust-them-CYP-Resilience-Survey-Report-English-1.pdf>

³¹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/06/I-trust-them-CYP-Resilience-Survey-Report-English-1.pdf>

³² <https://www.legislation.gov.uk/ukpga/2021/17/contents/enacted>

The strategy also must make reference and align to the National Action Plan for Child Sexual Abuse which is due to end and be reviewed.

Question 6

Do you think there is anything we should be doing as part of this Strategy that can have a positive effect on opportunities for people to use the Welsh language?

Survivor engagement work should be undertaken in Welsh and English, and commissioning of services should ensure that service delivery is in Welsh where the need is evidenced for this. Access to information in other languages must be available with English and Welsh as a second language. Whilst Welsh should be available and treated equally to English, a wide range of language provision should be funded, ensuring language is not a barrier to support.

Question 7

Are there any other things you think we should be doing to stop violence against women, domestic abuse and sexual violence, or do you have any other comments?

Commitment to sustainably fund the specialist sector

Support needs, background and current access is different for each individual survivor. The support on offer should reflect this. VAWDASV is a cause and consequence of inequality between women and men, which intersects with factors such as race, ethnicity, age, class, sexual orientation and disability, to impact on experiences of abuse and routes to recovery.³³

There is widespread recognition among experts and key stakeholders that all forms of VAWDASV are preventable. Tackling the norms, practices and structures associated with gender inequality which serve to legitimise or condone VAWDASV requires a multi-level strategic response – one which recognises the intersection of factors occurring at the societal, community, relationship and individual levels which increase the likelihood of VAWDASV.³⁴

A sustainable funding model for specialist services, is the foundation for ending all forms of VAWDASV. Funding services to run sustainably would not only enable the VAWDASV specialist sector to support women and children in both an immediate sense and living with long term trauma, but also enables the sector to work collaboratively with communities to tackle the root, systemic causes of VAWDASV. This can be achieved by rolling out and embedding effective policy and practice in

³³ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/11/Annual-Membership-Report-2018-19-FINAL.pdf>

³⁴ <https://www.humanconsultancy.com/assets/understanding-perpetration/bin/Review%20of%20Research.pdf>

preventing it from happening in the first place. Alignment of policy, practice and funding is the most effective way to bring about real change that lasts.

The pillar stones of a sustainable funding model

As highlighted in the 2020 report, the pillar stones of this must include:

- A focus on prevention and early intervention – full details³⁵
- Sustainable funding which supports children and young people – full details³⁶
- Equal weighting given to Sexual Violence services
- A continued commitment to refuge and accommodation-based support
- An increase in ‘By and For’ service provision
- A Welsh solution to supporting survivors with no recourse to public funds
- An acknowledgment that sexual exploitation must sit within the framework of ending VAWDASV
- Accredited perpetrator interventions, including early intervention

A sustainable funding model would give specialist services the opportunity to act flexibly and meet the needs of every survivor seeking support.

Support for women who are sexually exploited

We welcome the reference to sexual exploitation within this draft of the strategy but are not clear of the vision Welsh Government has to end women’s exploitation or how this strategy will support working towards creating and implementing this. In June we hosted a roundtable which focused on fully recognising sexual exploitation as a form of VAWDASV, aligning our response in Wales with work to end VAWDASV and prevent, protect and support all survivors, and culminated in pledges signed by PCCS and other stakeholder towards recommendations to the Welsh Government for work to end sexual exploitation. These are:

- A commitment for work to end sexual exploitation within the Welsh Government new National VAWDASV Strategy.
- A national vision to end women’s exploitation led by the Minister for Social Justice
- Including women with lived experience of sexual exploitation and/or engaged in the sex industry in the national survivor engagement framework or develop an engagement mechanism that ensures their voices are central in the development of policy and strategies.
- Enforcement strategies in Wales should align to the National Policing Sex Work and Prostitution Strategy that acknowledges the vulnerabilities and the needs of those who are, or have been, engaged with the sex industry/survival sex.

³⁵ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/12/A-Blueprint-for-the-Prevention-of-VAWDASV27918.pdf>

³⁶ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/11/Children-and-Young-People-participation-report-FINAL.pdf>

Support for women with No Recourse to Public Funds

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 refuges 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. 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.

When consulting with the network of NRPF champions, a common theme which was raised was a lack of consistency in interpretation of duties and guidance across local authorities. There is a duty under the Social Services and Well-being (Wales) Act to support women with NRPF fleeing abuse which specialist services report they are constantly challenged in local authorities accepting. As well as striving for a Wales based solution, Welsh Government should be using its leadership and the levers of this strategy to ensure all current duties, guidance and routes to support are fully understood and embedded across Wales.

Specialist service staff recruitment and retention.

Specialist VAWDASV staff are incredibly committed to ending VAWDASV, and it's important to recognise the physical and emotional impact that the role has on individuals in the sector.

Staff supporting adult and child survivors of VAWDASV have ensured that essential, lifesaving and life-supporting services continue during the pandemic. However, the ongoing challenge for the sector is that organisations are hampered by relatively lower wages, short term contracts and jobs carrying high caseloads and work out of hours. Many organisations in the sector have had to manage these conditions along with the additional demands created by the pandemic such as: the need for staff to isolate, staff being off sick and home-schooling children. Difficulties with recruitment and retention of staff have affected the sector and increased instability and uncertainty at a time where people have needed it the most.

Staff retention is an extremely pertinent issue currently facing specialist services. As an example, our members are currently able to pay £20,541 for a support worker role, whilst local housing association pay between £24,000 -£26,000 for similar roles. Even for equivalent roles, specialist services receive significantly lower funding to offer wages. For instance, an ISVA in a rape crisis centre has a wage of £27,444 but the statutory sector run SARC offers a wage of £35,000 within the same locality.

This inequality is particularly stark in specialist children and young people roles where an average local authority based role working with children pays 9.1% higher than those in the VAWDASV sector that require additional specialisms and skills. The specialist sector is working within tight budgets and has less flexibility than other organisations/ sectors to raise wages to attract appropriate staff when necessary.

This strategy must commit to addressing these issues, including strategic actions on how Welsh Government and wider agencies can support these mounting challenges.

Other challenges include:

- People not wanting to change jobs during the uncertainty of Covid-19
- Staff may feel undervalued seeing higher wages outside of the third sector
- Additional training and support costs put services at financial risk
- Capacity is taken away from service delivery to train new staff
- Creating roles around specific funding requirements set by government bodies, rather than meeting the needs of survivors.

Staff turnover, illness and difficulties recruiting have a financial and emotional cost. Delivering a trauma informed, needs- led service means having consistency and stability for survivors, particularly children and young people.

“Keeping the same staff member is crucial in terms of building relationships with young people and with schools” – Specialist Service

At the core of delivering this work and achieving the ultimate goal of ending VAWDASV in Wales is the expertise of specialist services and survivors. Without a clear and dedicated focus on prevention and adequate resourcing which allows both services and survivors to properly engage, there is a slim chance of improvement on the current situation.

Question 8

How should we measure progress and success in delivering the things outlined in this Strategy?

The Ministerial-led National Partnership Board should have mechanisms inbuilt for monitoring and accountability. It will be imperative that survivors and front line support workers are essential to this process, as they are the people who will see and feel first hand the impact of change.

When measuring success, it is important to note that this will look different to every woman and every service, the strategy must recognise that volume metrics not always helpful and can encourage practice which further excludes survivors from marginalised backgrounds, women with protected characteristics, and any survivor who is deemed ‘harder to reach’.

There is no more effective, or eloquent phrasing of this than in Imkaan's report, *From the Margin to the Centre: Proposal for an Alternative Bill addressing Violence Against Women and Girls*.³⁷

"We are clear that an effective response to VAWG must address inequality rooted in patriarchy and must apply a broad framework involving the structures, institutions and cultures of society. We are clear that women and girls hold many diverse experiences, and by locating policy in such experiences, we aim to address the nature of structural inequality and patriarchy and the power and control dynamics embedded in such systems. We call for an intersectional approach, which enables us to fully identify the lived experiences of all women vis-a-vis the multiple and co-occurring oppressions they face and how they address such struggles. We recognise that VAWG affects women in the public and private spaces they inhabit, in the livelihoods and opportunities they pursue and in many other ways. This means that women are affected by VAWG in all sectors and industries including business, media, entertainment, sports, technology, science and academia."

The remaining questions are more detailed:

Question 9

Do you agree with the [scope of the Strategy](#)?

Yes/No

Please give reasons for your answer.

We broadly with the scope outlined in the strategy as an organisation. We strongly agree with strategy being based on that gendered understanding both in terms of the support offered for survivors and the challenge and support offered to perpetrators, and recommend that this gendered understanding is re-stated at the beginning of the strategy, especially as the recently passed Domestic Abuse Act (2021) failed to include.

We would fully encourage Welsh Government commitment to the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) particularly around finding a solution to supporting Women fleeing abuse with NRPF. The Social Services and Well-being (Wales) Act 2014 is also referenced, we would like the strategy to acknowledge the duties under this Act to support women with NRPF fleeing from abuse.

The VAWDASV (Wales) Act 2015 also clarifies that children can be subject to VAWDASV, we strongly recommend This strategy needs to be strong in recognising

³⁷ https://829ef90d-0745-49b2-b404-cbea85f15fda.filesusr.com/ugd/2f475d_91a5eb3394374f24892ca1e1ebfeca2e.pdf

children and young people as victims in their own right, as in the Domestic Abuse Act 2021.³⁸

Question 10

We have proposed governance arrangements, which include working with key partner organisation and a number of sub-group/workstreams to tackle specific issues. Do you think working together in this way will improve coordination of work to stop violence against women, domestic abuse and sexual violence?

~~Yes/No~~ **Partially**

Please give reasons for your answer.

In governance structures such as these there is always the danger of 'death by subgroup', where there are lots of meetings with very little action or outcomes. To avoid this we suggest an overarching workplan for the Ministerial-led National Partnership Board where each subgroup and workstreams aims clearly meet a shared goal. It should also be ensured that subgroups are not only made up of people in the 'expert field' to provide sufficient challenge.

It will be crucial that survivors are included on this partnership board as experts and professionals in their own right, and that specialist services are clearly indicated in the strategy as part of the membership. Due to the cross government/ agency nature of the group we also urge that both the Education Minister and Health Minister are invited as members.

Question 11

Are you a professional, working with victims, survivors and perpetrators of VAWDASV?

~~Yes/No~~

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

³⁸ <https://www.legislation.gov.uk/ukpga/2021/17/contents/enacted>

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/>)

Question 12

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

The strategy is currently missing some key mechanisms which would prove beneficial to implementation and clarity for local authorities, and wider agencies. These include:

- Outline the timeframe for a delivery plan
- Outline the role of National Advisers
- Outline role of VAWDASV Regional Lead Advisors – to provide some coherence and consistency
- How Wales plans to work with the new Regional DA UK Commissioner
- Reference to the WG role within CAF/CASS Cymru and the harm report.
- Align the WEA with the development and delivery of the RSE curriculum
- How will the National Training Framework continue to be delivered and how will it be ensured it engages all those covered. Are there new area or developments that need to be covered.
- How the Survivor engagement framework will sit within the strategy.
- How will there be a coordinated approach to developing and delivering campaigns aligned to commitments.
- Clarify how actions align to the implementation of the articles relevant in the Istanbul Convention.
- Clearer representation on all forms VAWDASV with direct references to HBV, FGM, Rape, Sexual exploitation.
- Connection to all other plans – in order to avoid system generated risk. There is potential to create risk when there are multiple strategies that don't align and offer conflicting advice or information.

Name: Jordan Brewer. Policy and Research Officer

Organisation (if applicable): Welsh Women's Aid

Email address: JordanBrewer@WelshWomensAid.org.uk

Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box: