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Creating an offence of public sexual harassment

1. How widespread a problem do you think that public sexual harassment is in this country?

Violence against women is endemic in England and Wales, and across the world. The World Health Organisation published estimates in [2021](#) that globally around 1 in 3 women have been subjected to either physical and/or sexual intimate partner violence or non-partner sexual violence in their lifetime. In 2021, the All-Party Parliamentary Group for UN Women released a [report](#) on sexual harassment and its reporting in the UK. This found that 71% of all women in the UK have experienced some form of harassment in a public space, with this number rising to 86% among those aged 18-24.

In Wales, [data](#) from the Office for National Statistics found that 8% of respondents in Wales had felt physically threatened by a stranger in a public space, a higher proportion than any geographic region outside of London. Further, data from the Live Fear Free Helpline, funded by the Welsh Government and run by Welsh Women's Aid found that between January 2021 and June 2022, the Helpline reported a 229% increase in the number of survivors contacting the Helpline about stalking and harassment and data from Welsh Women's Aid's No Grey Area [report](#) found that four out of five women in Wales had experienced sexual harassment at work, the majority of whom had experienced multiple instances of sexual harassment from multiple perpetrators.

It must also be noted that prevalence rates vary for different communities. For example, [data](#) shows that women, young people, people from minoritized ethnic communities, LGBT+ people, and those with highly limiting disabilities were more likely to have experienced at least one form of sexual harassment in the last 12 months.

Not only is public sexual harassment widespread, reporting rates for public sexual harassment are low, largely due to lack of trust in the systems that are meant to protect women. The All-Party Parliamentary Group for UN Women report found the main reasons for not reporting sexual harassment were not thinking the incident was serious enough to report (55%) and not thinking reporting would help (45%). Additionally, the Government Equalities Office have [found](#) that often, the most frequently experienced behaviours were among the least commonly reported, while the least experienced behaviours were the most commonly reported.

Ultimately, it is clear that public sexual harassment is widespread in England, Wales, and beyond, more so for young women, especially those from marginalised communities, and that the scale of the problem leads to attitudes that public sexual harassment is normal or inevitable. It is also clear that reporting rates are low, particularly for the most common forms of public sexual harassment, and due to the lack of trust in reporting systems, women often feel like they must modify their own behaviours, including avoiding certain public spaces in order to avoid sexual harassment.

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2. Do you think that there should be a specific criminal offence of public sexual harassment?

- Yes
- No
- Don't know

Questions 6 – 13 would apply if there were to be a new criminal offence of public sexual harassment. We welcome responses both from those who do support and from those who do not support a new offence of public sexual harassment.

6. Would Option 1 be a viable model?

- Yes
- No (please specify why)
- Don't know

Whilst we appreciate the intention regarding making public sexual harassment more clearly specified in law, Welsh Women's Aid have several concerns around the proposed wording in Option 1, as follows:

- We do not agree that public sexual harassment occurs solely because of someone's sex. Whilst it is undeniable that women are disproportionately subjected to public sexual harassment, it must be acknowledged that these behaviours are perpetrated to exert power and control. It is reductive for the wording in legal guidance to state or imply that such behaviours solely occur 'because of the relevant person's sex'.
- We raise concerns that public sexual harassment is prevalent as an intimidation tactic in many communities. For example, the [TUC](#) conducted the first major survey into sexual harassment of LGBT people in the workplace and found that 68% of LGBT people have been sexually harassed at work, and [more recent research by Galop](#) similarly found 74% of LGBT+ respondents had experienced some form of sexual harassment. In these instances, public sexual harassment certainly doesn't occur because of someone's sex, so presumably would not be covered by this legal framework. We believe that all forms of violence must be tackled equitably, and that legislation should be consistent across all forms of violence.
- In particular, we wish to raise our concern that there is no acknowledgement within this consultation of street harassment when faced by survivors of sexual exploitation. Though data in this area are minimal, some [research](#) shows survivors who have experienced street-based sexual exploitation have often faced disproportionate levels of sexual harassment, as well as other forms of violence, and that this violence is often perpetrated in public settings such as car parks and side streets. This research also highlighted that few report such incidents to the police. Historically, those who have experienced sexual exploitation or harm through the sex industry are left out of conversations about the impacts of forms of VAWDASV and

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we urge any legislation to include and be applicable to all survivors of VAWDASV, including those who have faced sexual exploitation.

- We have concerns around the wording involving 'intentional harassment, alarm, or distress'. Not only is intention hard to prove in a legal context, but it also ignores the fact that these are active choices made by perpetrators and the impact and harm caused by public sexual harassment. Ultimately, if behaviour makes survivors of public sexual harassment feel unsafe in any context, we should trust and believe them. To ignore the consequences for survivors is to ignore the VAWG element of public sexual harassment and would undermine any progress made to date.
- Related to the above, we believe that the concept of 'distress' among survivors is problematic as it is so subjective. If behaviours are wrong, they should not need to be proven to cause distress to be considered as such. Indeed, [data](#) from the Government Equalities Office found that not all who experience sexual harassment stated that it affects their quality of life significantly. In this study, 54% of those who had experienced sexual harassment in the last year reported that they felt it had very or fairly affected their quality of life, and there were significant differences in reported impact on quality of life for different forms of sexual harassment. We believe that even if survivors do not report experiencing subjective distress, they deserve to be believed and to be treated equitably. This is likely to be a consequence of the scale of sexual harassment in society and the degree to which it has become normalised.
- The focus on the focus on a single individual's distress also fails to recognise that public sexual harassment is directed at random individuals not enduring relationships, and as such, taking an incidentalist approach which asks 'was this person upset' fails to recognise a different person would have been differently upset and could have been the target. We need to focus on the offender's decision making/choice, rather than the impact on the survivor.
- Further, we have concerns that the need to prove distress may put survivors off reporting public sexual harassment. We know that an overwhelming amount of survivors do not feel able to report sexual harassment to the police and that when they do, they are [asked to provide disproportionate amounts of evidence](#) when compared to victims of other violent crime. This is a [significant catalyst](#) in the attrition of sexual offence complaints by survivors when navigating the criminal justice system.
- Finally, given the subjectivity, we are concerned that distress is hard to prove, particularly given many incidents of VAWDASV are reported retrospectively, and we question whether victims of other serious or violent crimes are subject to such a degree of scrutiny when assessing the consequences of such crime.

7. Would Option 2 be a viable model?

- Yes
- No (please specify why)
- **Don't know**

In additional to the points outlined in Question 6, above, we do not believe the examples of conduct that might constitute public sexual harassment are fit for purpose for the following reasons:

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- The phraseology is too vague. As an example, 'following a person' is not defined well enough to adequately reflect the lived experience of survivors of public sexual harassment. For instance, [research](#) from the Government Equalities Office released in 2021 found that of the 41% of people who had experienced sexual harassment in the previous 12 months, nearly one fifth (18%) had experienced at least one type of public sexual harassment on a daily basis, whilst 21% reporting experiencing sexual harassment on a weekly basis. Further, the same research found that sexual harassment can often involve a pattern of repeated behaviours. Indeed, 16% of the population sampled had experienced repeat sexual harassment from one individual or group of perpetrators and of those that had experienced sexual harassment in the last 12 months, over a third (34%) experienced it repeatedly from the same person. Therefore, we don't believe the wording in this list accurately portrays the incidence, prevalence, or frequency of public sexual harassment.
- The list misses out many types of public sexual harassment experienced across society including, but not limited to: uninvited/unannounced presence in public places e.g. a survivor's workplace, repeatedly turning up unannounced, online sexual harassment, repeatedly contacting someone via the phone, sexual touching (for example, on public transport), unwelcome staring or looks, provocative sounds, purposeful invasion of personal space, and taking pictures/videos without permission.
- Finally, will this list be updated regularly? We know that the tactics used by perpetrators to exert power and control change over time, often rapidly, and the only way to make a descriptive list fit-for-purpose is to add in the guarantee that it is updated regularly.

8. If you consider that both Option 1 and Option 2 would be viable models, do you think either option would be more effective? Please explain why.

- Yes (Option 1 would be more effective)
- Yes (Option 2 would be more effective)
- No
- Don't know
- **N/A – I do not consider that either Option 1 or Option 2 would be a viable model**

9. Do you think there is a better way to construct a public sexual harassment offence than either Option 1 or Option 2?

- Yes (please provide details of what such an offence could look like)
- No
- **Don't know**

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Welsh Women's Aid believe that if the criticisms levied within this response were addressed, alongside wholesale improvement of the criminal justice system, this may be a better model to address public sexual harassment. However, regardless of the content, this must always come alongside non-legislative responses and mechanisms to address all forms of violence against women, some of which will be detailed below.

10. Noting that the list of example behaviours in Option 2 is not exhaustive, do you think that it captures the most common types of public sexual harassment behaviour?

- Yes
- **No**
- Don't know

If No, which additional ones would you include?

These are outlined above.

11. Do you consider that any of the example behaviours in Option 2 should be excluded? If so, please state why.

- Following a person;
- Making an obscene or aggressive comment towards a person;
- Making an obscene or offensive gesture towards a person;
- Obstructing a person making a journey;
- Driving or riding a vehicle slowly near to a person making a journey.
- **None of them should be excluded.**
- Don't know

12. Do you consider that the maximum sentence included is the correct one?

- Yes
- No (please state what you think it should be instead)
- **Don't know**

Welsh Women's Aid acknowledge that for some survivors, the judicial route is the journey that is right for them and empowers them. Where this is the case, we believe that sentencing guidance should be congruent with other forms of interpersonal violence. However, we also appreciate that for some survivors,

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criminalisation is not a solution and can be detrimental to the survivor, for example, through re-traumatisation and not feeling supported or believed.

To that end, it is also worth questioning how effective it is to have a prescriptive maximum sentence. Research has shown that reoffending rates are high for many forms of VAWDASV, and [data](#) from Her Majesty's Inspectorate of Probation suggest that sexual offender treatment programmes have a beneficial effect on reoffending, and these are best when delivered in community and hospital settings. Consequently, we want to reiterate our point that non-legislative solutions focusing on early intervention and prevention must take precedence so that behaviours such as public sexual harassment do not happen in the first place, and our focus must be on eliminating all forms of violence against women.

13. Do you have any other comments on Options 1 and 2?

Welsh Women's Aid believe that creating a specific offence of public sexual harassment sends the message to survivors that we believe them. When public sexual harassment is so prevalent within society, as detailed in our response to Question 1, it is important to send a clear message to both perpetrators and survivors that sexual harassment is serious, it is not 'banter', and it should never be treated as such. We also welcome the acknowledgement that behaviours comprising public sexual harassment are rooted within the context of violence against women and girls, and that they have very real consequences for survivors, regardless of the extent to which they are seen as 'normal' or 'everyday' occurrences. Further, given the prevalence of workplace sexual harassment, we welcome the potential benefits of workplaces knowing whether someone has a history of public sexual harassment to maintain the safety of those in the workplace.

Notwithstanding the above, we do not believe that the introduction of a specific offence of public sexual harassment is enough to tackle the scale of the problem alone. This consultation itself admits that many behaviours that would fall under a new public sexual harassment offence would already be covered by existing law, but we know that isn't preventing sexual harassment from happening, nor is it encouraging survivors to report. We know that two of the main reasons survivors don't report sexual harassment are that they aren't aware incidents are serious enough, and that they don't believe they will be taken seriously. Almost half (44%) of the women surveyed by the All-Party Parliamentary Group for UN Women report said that having more confidence that reporting an incident would prevent it from happening again would encourage them to report.

Further, it is clear that even where behaviours are criminalised, their prevalence is not decreasing. In their [Tackling violence against women and girls strategy](#), released in 2021, the UK Government themselves noted that the prevalence of many forms of VAWDASV, including domestic abuse, stalking, rape, indecent exposure, and unwanted touching, has remained broadly the same since 2008/9. The question is, then, if

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these have been criminal offences for the duration of this time period, is criminalisation effective or sufficient as a preventative measure?

We strongly believe that as a measure to tackle public sexual harassment, this cannot stand alone. It must come alongside strong, sustainable non-legislative actions that tackle sexual harassment, alongside all forms of violence against women, from the root.

Whilst we appreciate there are existing criminal offences which can be used in cases of public sexual harassment, such as sections 2 and 4 of the Protection from Harassment Act (1997), we welcome the acknowledgment that public sexual harassment, and all forms of domestic abuse and sexual violence are disproportionately experienced by women and perpetrated by men, and we encourage the view of such forms of violence through a gendered lens.

However, we believe that careful consideration should be given to recognising a course of conduct of an offender on multiple single survivors, which is widely reported by survivors of public sexual harassment, rather than taking an incidentalist approach to the offence of public sexual harassment.

We also wish to raise concerns about the potential harms of criminalisation. Firstly, for survivors. Given low reporting rates and even lower investigation and prosecution rates, we worry that criminalisation places survivors at risk of re-traumatisation and having their credibility questions whilst navigating the criminal justice system. Secondly, for those from black and minoritized ethnic communities, it is widely reported that policing measures in public places, particularly stop and search, are disproportionately carried out on black men. UK Government [data from this year](#) shows that whilst there were 7.5 stop and searches for every 1,000 white people, there were 52.6 for every 1,000 black people, and [data](#) shows that in 2020/21, two thirds of children arrested in London were from minoritized ethnic groups. Further, when arrested, black men are more likely to be subject to excessive force, with [reports](#) that a disproportionate amount of black and minoritized ethnic men die after encounters with the police. In the light of such evidence, we are concerned that further criminalisation, if not implemented properly and fairly, may exacerbate already existing disparity between the way people from white and black and minoritized ethnic communities are treated by institutions of power.

14. Do you think that introducing a new offence of public sexual harassment would have implications for the resources of the police and the criminal justice system?

- Yes (please provide further details)
- No
- Don't Know

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Ultimately, we believe that creating a new offence of public sexual harassment would have implications for the resources of the police and criminal justice system because:

- There are many reports already about low reporting rates among survivors of public sexual harassment. Research from the [Government Equalities Office](#) found that non-reporting is a common response amongst those who experience sexual harassment. They found that only one third of those who had experienced sexual harassment in the previous 12 months had formally reported it, and that the most commonly experienced forms of sexual harassment were the least commonly reported. In fact, for most types of behaviour assessed, it was more common for survivors not to report incidents than to report them. More specifically, research shows that particular types of sexual harassment are underreported such as in the [workplace](#) and in [higher education institutions](#). When asked about barriers to reporting, the All-Party Parliamentary Group for UN Women [report](#) found that 45% of women did not report sexual harassment because they did not think it would help, and 16% of women did not think they would be believed. When asked about what would improve the likelihood of reporting, 44% of women agreed that having more confidence that reporting would have consequences would improve their chances of reporting. Combined, these data show clear lack of trust in reporting systems, and it is well-known that lack of resourcing in the police is one of the main drivers of non-investigation and non-conviction of crimes such as public sexual harassment. As such, we remain concerned that creating a new offence would further burden an already over-burdened and under-resourced system, and would not provide survivors of public sexual harassment with the closure or justice they deserve.
- Related to the above, we are concerned that if such crimes are reported and reports are inconsequential due to lack of capacity, it will risk a two-tiered view of public sexual harassment, in which only incidents that are deemed 'bad enough' would be pursued, and this would effectively legitimate 'lower level' or unintentional harassment and further reduce already low confidence in the institutions that are meant to support and protect women.

15. Do you think that the non-legislative actions which the Government and other statutory authorities have been taking to tackle public sexual harassment – as set out in section 2 of this document – are sufficient? We welcome answers both from those who think that there should be a new criminal offence of public sexual harassment and from those who do not.

- Yes
- **No**
- Don't know

16. If you think that those actions are not sufficient, which additional non-legislative actions do you think that the Government and other statutory authorities should take?

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When all forms of violence against women are so prevalent across the UK, we do not believe the non-legislative actions outlined in this consultation go far enough to create meaningful change or to work towards our ultimate goal of ending VAWDASV. Below, we outline the reasons and suggest further non-legislative action that must be taken:

- The toolkit designed for police is, at best, superficial. It fails to account for the many types of behaviour that survivors report when subject to public sexual harassment, some of which are outlined in our answer to Question 7, or the seriousness in terms of prevalence and impact on the survivor. Further, the list of preventative strategies are not truly preventative strategies. Elements such as restraining orders, stalking protection orders, and non-molestation orders do not educate perpetrators or tackle the power and intimidation tactics that drive violence against women at the core, they only scratch the surface of current perpetrator behaviours. Not only is such a toolkit unhelpful, we question whether when the police and their resources are already so stretched, will all police officers in all forces have sufficient time to read, digest and implement a toolkit properly? We believe that mandatory, accredited training for police officers, designed and delivered by experts from specialist services, must be undertaken to properly inform police about what public sexual harassment is, the consequences for survivors (and the consequences for society more broadly), and how to support survivors in a meaningful, trauma-informed manner. Examples of such training can be found [here](#).
- We need to create meaningful whole-society change to tackle violence against women, for which the support provided by specialist services is key. Such services cannot provide the consistent support survivors need on short-term, unsustainable funding. We believe one of the most impactful non-legislative actions that must be taken is to ensure sustainable funding for the specialist sector.
- We need a commitment to campaigns and awareness-raising that tackles VAWG at the root, with a focus on the behaviour of perpetrators, not survivors. We know that more and more women [report](#) modifying their own behaviour, including not smiling, wearing specific types of clothing, not drinking and not walking alone. We firmly believe that women should not need to modify their behaviours in order to avoid sexual harassment, and we query whether actions suggested in this consultation such as more CCTV and street lighting, or preventing women from standing at bus stops alone, are helpful in tackling VAWG from the bottom up. We suggest that campaigns which challenge attitudes and raise awareness are more effective.
- Robust data on the prevalence and incidence of different forms of sexual harassment and the degree to which they are reported are few and far between and are not kept up to date. We believe that high-quality, official data is required to understand how common all forms of public sexual harassment are, and to benchmark what the success of introducing this piece of legislation would look like. The result must be a reduction in prevalence of all forms of public sexual harassment, and we must have access to high-quality data to properly evidence this.

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17. In particular, are there any other non-legislative actions which the Government should take to tackle public sexual harassment which takes place in the night-time economy?

- Yes (please specify which ones)
- No
- Don't know

These are outlined above.

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