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Welsh Women's Aid

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Putting Women & Children First

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These are the views of:	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse, and sexual violence (VAWDASV) specialist services in Wales. Our membership comprises of 20 specialist support services. These services deliver lifesaving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence against children and young people, men and boys, trans, and non-binary people, 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 also award 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](#)).

Question 1

Do you agree with the Long-term Aim? Please explain your answer, suggesting any amendments.

Broadly, we do agree with the long-term aim that sets social justice at the heart of all Welsh Government work. The aspiration for a Wales where all people have equal access to human and civil rights is a noble goal, however, safety is a fundamental human right. Gender-based violence is a

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violation of human rights. We know the Welsh Government is working hard to create a more equal Wales, through the Programme for Government, which contains the objective to 'celebrate diversity and move to eliminate inequality in all of its forms'¹.

We also know that Welsh Government has admirable aims for Wales to be the safest place in Europe to be a woman and we believe the safety of women and girls deserves explicit mention in the long-term aim. Accordingly, we believe the final part of the long-term aim should read:

"We want a fair Wales that is free from discrimination, an inclusive Wales where all individuals feel safe, valued, respected and included".

We understand the intuitive appeal of framing both the Long-term Aim and the National Equality Objectives within several thematic areas, but we have some concern that this creates unnecessary silos in policymaking. Most areas of policy fall across multiple areas of work. Violence against women, domestic abuse and sexual violence (VAWDASV) policy, for example, falls within each of these themes and we are concerned that looking at them in isolation is a barrier to holistic, cross-directorate and joined-up national policy.

Question 2

Do you agree with the proposed National Equality Objectives above? Please explain your answer, suggesting any amendments.

We welcome the inclusion of violence against women, domestic abuse, and sexual violence in National equality objective 4. We highlighted in our response to the previous Strategic Equality Objectives 2020-2024 that explicitly naming VAWDASV in the objectives was key to Wales becoming a leader for gender equality and to align with the national VAWDASV indicators². Subsequently, we are pleased that VAWDASV has been included in the objectives and consider this progress from the 2020-2024 Strategic Equality Plan.

However, in our previous response we also mentioned that weaving the importance of and specifically naming VAWDASV across all the objectives was key to improving equality. VAWDASV impacts all policy

¹ <https://www.gov.wales/programme-for-government-2021-to-2026-well-being-statement-html>

² <https://welshwomensaid.org.uk/wp-content/uploads/2021/11/WWA-Response-to-Strategic-Equality-Objectives-2020-2024.pdf>





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areas and given the prevalence and scale of VAWDASV in Wales, tackling it is crucial to ensuring women in Wales are on an equal footing with men.

Accordingly, we have several suggestions to strengthen the inclusion of VAWDASV across the objectives:

- Under Objective 3, point 4: working to ensure discriminatory attitudes are tackled in the public service system must also include ensuring all people working in Welsh public services feel safe at work. This Objective should explicitly include steps to ensure women's safety at work across Wales and to do this, we urge the Welsh Government to more actively promote the Sexual Harassment in the Workplace toolkit developed by Welsh Women's Aid and TUC Cymru³.
- Related to the above, we believe that Welsh Government should not only be ensuring discriminatory attitudes are tackled in the public service system, they must also be holding public service leaders accountable for the progress in this area. We have seen repeated stories of those in positions of authority across public services in Wales failing to address issues such as misogyny and abuse and areas where organisations are falling short of their responsibilities in this area. Welsh Government must do more to improve governance and policy and ensure women in workplaces in Wales feel safe and equal.
- Under Objective 4, point 1: we wish to note that this objective is too narrow. VAWDASV intersects with many of the protected characteristics and other forms of oppression, meaning these survivors experience VAWDASV in different, often more severe ways. These must be considered in the whole rather than in isolation.
- Related to the above, support services are generally very aware of how these issues affect communities, however, they are not always sufficiently resourced or trained to provide the support required. More clarity is needed within this objective to address the gaps in support provision and knowledge to tackle this holistically.
- Under Objective 4, point 2: we welcome the acknowledgment that all people should have access to appropriate, intersectional advice and support, however, we know that the funding is not in place to deliver this. Support services across Wales are facing acute funding shortages and subsequent issues with staff recruitment and retention. This is especially true for smaller, more specialist 'By and for' organisations, which is compromising true intersectional support for survivors of VAWDASV.

³ <https://www.tuc.org.uk/sites/default/files/2023-03/Sexual%20Harassment%20Toolkit%20-%20English%20%281%29.pdf>





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- Under Objective 4, point 3: we welcome the commitment to updating the national VAWDASV indicators, but this has been underway for some time and the progress is far too slow. The national indicators are now 5 years old and no longer fit the context within which we are working⁴. A review of the national indicators was promised in the new violence against women, domestic abuse, and sexual violence strategy⁵, to align with the whole system approach, but we are aware of no promises on the time scale of this review, nor any progress on this to date.
- Under Objective 5, point 5: it is crucial that we tackle harassment of those running for election, those holding public office, and their staff. Abuse perpetrated against politicians is on the rise, especially violence against women politicians. This is particularly true in online spaces, where women are 27 times more likely than men to experience abuse⁶, and where Black, Asian and minoritised ethnic women MPs receive substantially higher levels of online abuse than white women MPs⁷. Indeed, many people, particularly from underrepresented groups, choose not to run for public office due to fear of intimidation or harassment. We believe consideration of ways to prevent such abuse and ensure the safety of those in democratically elected positions is key to ensuring they are both diverse and representative of the electorate and must be included within this Objective.
- Under Objective 5, point 5: we welcome the Access to Elected Office fund for disabled candidates and the placement of this on a statutory footing, however, we were disappointed that commitments to expanding this have been dropped in the Elections and Elected Bodies (Wales) Bill. There is no doubt that candidates from other underrepresented groups such as women, parents, those with caring responsibilities, and those with other protected characteristics face significant barriers when running for public office and consideration of the funding implications of the process on these groups is a clear way to remove unequal access to elected office.
- Under Objective 6, point 2: pay parity should be a goal not just for all levels within Welsh Government but for all public services under Welsh Government jurisdiction. Pay disparity is one of the main drivers of income inequality. Women are more likely to be in low income or part-time work and are less likely to have access to savings and disposable income, and this is compounded by unequal pay^{8,9}. Lack of access to financial resources is a significant barrier to escaping abuse, particularly for women who have experienced financial and/or economic abuse, and this this is a common lever of control both within relationships and during postseparation abuse. We believe tackling the gender pay

⁴ https://www.gov.wales/sites/default/files/publications/2019-06/national-indicators-for-wales_0.pdf

⁵ <https://www.gov.wales/violence-against-women-domestic-abuse-and-sexual-violence-strategy-2022-2026-html>

⁶ <https://www.amnesty.org.uk/press-releases/toxic-twitter-failing-women-letting-online-violence-thrive-new-research>

⁷ <https://www.amnesty.org.uk/online-violence-women-mps>

⁸ <https://wbg.org.uk/wp-content/uploads/2022/03/The-gendered-impact-of-the-cost-of-living-crisis.pdf>

⁹ <https://wbg.org.uk/wp-content/uploads/2022/11/Gendered-impact-of-cost-of-living-crisis-on-public-services-1.pdf>

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gap is a crucial step to ensuring survivors have financial independence and sufficient means to seek support.

Question 3

Please tell us about any other issues relating to equality and community cohesion in Wales that you feel should be addressed?

There is a notable lack of data and evidence of the incidence and prevalence of all forms VAWDASV in Wales, which impacts our understanding of the true scale of violence against women and girls and subsequent policymaking and resource allocation. This is particularly true for certain forms of abuse, such as police-perpetrated domestic abuse, adult sexual exploitation, and so-called 'honour'-based abuse. It is also more apparent for the experiences of certain communities such as older people, migrant survivors, survivors in rural parts of Wales, and survivors for whom English is not their first language. Without an in-depth understanding of these issues and ways to address them, it will be extremely difficult to fully eliminate violence against women and girls and achieve equality. In their recent report¹⁰, the Equality and Social Justice Committee recommended the Welsh Government set out how the development and evaluation of policies which address the intersectionality of gender-based violence will be informed by data, evidence and analysis and provide the Equality, Race and Disability Evidence Units with clarity regarding their priorities and timescales. We endorse these recommendations and urge the Welsh Government to consider how they will identify and overcome the current evidence gaps within the Strategic Equality Plan.

To elaborate on an earlier point, issues within public services are increasingly creating bridges between services and survivors of abuse. Sexism and misogyny have been shown to be rife across public services, such as the police, the NHS, and fire and rescue services across Wales. We appreciate the work Welsh Government has undertaken in this area; however, this is a crucial time and they must commit to ensuring all public services have adequate training and reporting mechanisms, and that individuals who come forward to report are given the proper protection.

Question 4

Do you believe having the proposed Principles of Approach strengthens the Strategic Equality Plan?

¹⁰ <https://senedd.wales/media/u5zm1rok/cr-ld16253-e.pdf>





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Yes, however, we have several suggestions to improve the Principles themselves, which are outlined in our answer to Question 5 of this consultation.

We also have some concerns over the general strategy that underpin the Principles of Approach.

Firstly, whilst we appreciate that a 'living document' helps policymakers adapt to changing needs, which is important, we are also concerned that this may impact both target setting and scrutiny. We welcome the commitment to an annual report on the progress of the plan, however, the notable lack of targets within it will make progress difficult to measure.

Secondly, we appreciate that the Strategic Equality Plan aims to look at change over the longer term, with a view to building on the previous plan and working towards the long-term aim. However, the realisation of this will depend on achievable, shorter-term strategic goals, the delivery of which will fall on both statutory and non-statutory agencies. As such, we are concerned that the plan does little to consider how these changes will be achieved or the resources that will be required. We have concerns around several of Welsh Government's funding lines, namely the stagnation of the VAWDASV budget and Housing Support Grant, and the notable reduction in the Social Justice Budget, 60% of which, totalling £4.2 million, will come from the Equality, Inclusion and Human Rights Budget¹¹. These concerns are deepened by the closure of Chwarae Teg, who played a key role in advancing conversations about equality and scrutinising policy in Wales.

We have previously called for more clarity around spending within specific business expense lines (BELs) to improve transparency and scrutiny¹². The Statutory Guidance for VAWDASV Commissioning states that "commissioning should not be done in silos – it is also about mainstream provision and links with health, education, probation, police etc"¹³, however, without increased transparency over the Welsh Government budget, it is hard to evidence where this is or is not happening.

Together, these set a concerning precedent that while the Welsh Government's objectives are admirable, they are not accompanied by sufficient funding or resources to adequately support implementation.

Question 5

¹¹ <https://welshwomensaid.org.uk/wp-content/uploads/2023/12/WWA-Response-Welsh-Government-Draft-Budget-2024-25-Call-for-Evidence.pdf>

¹² ibid

¹³ <https://www.gov.wales/sites/default/files/publications/2019-05/statutory-guidance-for-the-commissioning-of-vawdasv-services-in-wales.pdf>





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If so, do you agree these are the right Principles of Approach? Please explain your answer, suggesting any amendments.

We agree with the need to mainstream equality in the design and delivery of all Welsh Government interventions and policy development. There are several areas where this falls short at present and we believe these must be directly addressed.

- We agree with the use of meaningful Equality Impact Assessments but the implementation of these must be addressed. A review by the Audit Office Wales found that while there are examples of good practice in aspects of the equality impact assessment process across public bodies in Wales, there were a number of suggested areas of improvement including greater clarity about applicability and expectations, more engagement from those with lived experience, better outcome measurement, and crucially, moving away from the mindset that these are a 'tick-box exercise'¹⁴. These suggest that while Equality Impact Assessments are well meaning and go some way to assessing the impact of policy on equality, there is more to do, and the Strategic Equality Plan lacks any commitment to improving or changing the process to better achieve change.
- An intersectional approach to policy delivery and development is key. As outlined above, we urge Welsh Government to ensure cross-directorate working across all areas of policy to prevent VAWG and ensure ring-fenced funding for policy areas.
- Related to the above, gender budgeting is important to consider in delivery. All forms of violence against women and girls are rooted in unequal power and control between men and women, and addressing the fundamental inequality between them is vital to eliminating VAWG. As such, we welcome the progress made to date, including the ongoing pilot work and the commitment to reviewing the Strategic Integrated Impact Assessment of the Budget, but Welsh Government must commit to applying this across all areas of Government to ensure gender equal policymaking and resource allocation.
- We agree that there is, at times, a gap between intention and delivery. Often strategies are vast and do little to help the current situation on the ground. While we appreciate that Equality Impact Assessments do address processes somewhat, we urge Welsh Government to consider the timeliness of policy implementation when developing and setting targets. These must not just focus on how proposals will bring about equality, but also when.

¹⁴ https://www.audit.wales/sites/default/files/publications/Equality_impact_assessment-english_0.pdf





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Question 6

Do you believe the National Equality Objectives will help us fulfil the Socioeconomic Duty? Please explain your answer.

Yes. We welcome the introduction of the socioeconomic duty and we feel that these objectives will go some way towards fulfilling them. However, we have a few reservations:

- There is a need to further consider the intersection between economic disadvantage and abuse. Women are less able to escape poverty, and this is more so the case for women who have multiple support needs such as those who have experienced a form of violence against women. This is particularly true for Black and minoritised women, older women, Deaf and disabled women, and LGBTQ+ women. Economic abuse is on the rise and continues to be common post-separation, with many women receiving support such as refuge support unable to work or having to leave employment. Many areas of policy, such as education, health, and housing, have direct impacts on women's socioeconomic status and are important to consider when tackling violence against women and girls. We rarely see sufficient cross-directorate approaches that consider how these areas link up and we believe the National Equality Objectives must consider this further in order to properly fulfil the socioeconomic duty and prevent abuse.
- As outlined above, despite the admirable aims of the National Equality Objectives, appropriate resources will be needed to achieve them and thereby fulfil the socioeconomic duty.
- It is also important to consider how well the socioeconomic duty is working at present. The socioeconomic duty aims to embed equality into decision-making across Wales. While we appreciate it may take some time for the impact of the duty, introduced in 2021, to become clear, we await notable changes to the economic outcomes for people in Wales. In the most recently available data, although the number of people living in relative poverty in Wales did decrease, no changes were statistically significant, and the percentage of people living in relative poverty in Wales remains higher than in Scotland and Northern Ireland¹⁵. More recent data shows that there have been no major improvements in living standards across Wales to date and that in the period between April and September 2023, food banks in the Trussell Trust network distributed over 88,500 food parcels, which is the most parcels the network has ever distributed at this time of year and a 15% increase on the same period in 2022^{16 17}.

¹⁵ <https://www.gov.wales/relative-income-poverty-april-2021-march-2022-html#119552>

¹⁶ <https://www.bevanfoundation.org/wp-content/uploads/2023/08/Snapshot-of-poverty-in-summer-2023.pdf>

¹⁷ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2023/11/MYS-Wales-Factsheet-2023.pdf>

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Question 7

Do you believe the National Equality Objectives will help to promote and embed human rights in Wales. Please explain your answer.

As outlined previously, gender-based violence is a violation of our human rights. We believe that violence against women needs to be better encompassed across all the National Equality Objectives to properly promote and embed human rights in Wales. We also need to move quicker and more boldly to realise these objectives using clear, measurable, achievable targets.

Question 8

Do you have any further specific points you'd like to raise in relation to the Strategic Equality Plan?

We have previously outlined our concerns around access to support in different languages. We welcome the Welsh Government's aims to have a million Welsh speakers by 2050, as set out in the 'Cymraeg 2050: work programme 2021 to 2026'¹⁸, however, with regards to combating violence against women and girls, more must be done. There are many additional barriers to support in areas where there are higher proportions of Welsh speakers, which may be compounded by rurality and difficulty accessing support in different geographical regions. The same is true for speakers of other languages, including British Sign Language. It is vital that everyone in Wales has equal access to access support and services, and steps to overcome these barriers to access should be included the Strategic Equality Plan.

There have been several recent updates to the Equality Act, for example, the introduction of Worker Protection Act in 2023¹⁹, and we urge Welsh Government to outline in more detail how they can proactively support and include both updates to the Equality Act and advancements in our understanding of equality outside the scope of The Act.

¹⁸ <https://www.gov.wales/cymraeg-2050-our-plan-2021-2026>

¹⁹ <https://commonslibrary.parliament.uk/research-briefings/cbp-9619/>

