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

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](#)).

Consultation on the draft disabled people's rights plan

Q1. The Disabled People's Rights Plan has this overarching ambition:

"The Welsh Government is committed to promoting the rights of disabled people, and to ensure disabled people are included and able to participate in all communities in Wales. We want to make Wales an inclusive and accessible place for disabled people; a society where disabled people can participate without limits or restrictions and are empowered to lead fulfilling lives, where their individual and collective rights are recognised and upheld and where their contribution is recognised."

Please tell us what you think about our proposed ambition. Is this the right ambition to improve equality for disabled people in Wales? What, if anything, could be added to or removed from this ambition?

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WWA are pleased to see that in this plan the Welsh Government has reflected a more realistic timescale for systemic change to occur than in previous plans. We agree with the overarching ambition and believe that approaching it from a social model perspective is likely to generate the necessary changes effectively. We would wish for the overarching ambition to more explicitly note that there are systemic barriers to overcome and that to be truly inclusive we need to address differing needs through an intersectional lens. We are glad that the specific needs of babies, children and young people are identified and also those of disabled survivors of violence against women domestic abuse and sexual violence. We would like to see greater focus placed on promoting and upholding the dignity of disabled people as this is something that is often overlooked through more medicalised approaches to addressing disabled people's rights.

**Q2. The Disabled People's Rights Plan is split into 4 themes:
Neighbourhoods and places. Employment, income, and education. Independent living.
Justice and supporting environments. Please tell us whether you think these themes are
suitable for the plan. Do these themes cover the main issues or barriers that disabled
people experience? Are there any missing areas that should be added to these themes?
If yes, what are they?**

We are pleased to see the themes that have been identified for the plan and believe that these are suitable. Whilst Health and Social Care is covered within the Independent Living theme we are concerned that this may minimise the importance of transforming the accessibility of Health and Social Care services for disabled people. Similarly, we are very glad to see Justice included under the Justice and Supporting Environments theme but are unclear as to what precisely is meant by Supporting Environments. This isn't a term in common usage and may present some difficulty in being understood. If the intention is for this section to include Policing and Criminal/Family/Civil Justice inclusively then perhaps it would be better to rename the theme to better describe this as Access to Family, Criminal and Civil Justice. We also wish to ensure that Neighbourhood and Places more explicitly includes disabled people's access to engagement within their communities and their ability to influence further political reform at a local level (Disabled people: political participation House of Commons Library)

**Q3. The plan sets out the following main topics:
Embedding and understanding of the Social Model of Disability. Access to services.
Independent living: social care. Independent living: health. Travel. Employment and
income. Affordable and accessible housing. Children and young people. Access to justice.
Wellbeing. Do these topics cover the main issues or barriers that disabled people
experience? Are there any missing areas that should be added to these themes? If yes,
what are they?**

The plan covers some of the key areas in which disabled people experience inequity and discrimination and we are pleased to see that there is a scrutiny and monitoring mechanism in place to chart the progress of Wales's ambitions. We would like to see a clearer demarcation of how the ambitions translate into enforceable requirements on services to ensure that they are doing more than

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the bare minimum to meet the needs of our disabled communities. We would also like to see more specific sections within the plan that lay out the commitments to addressing multiple disadvantage and discrimination and participation. Both of these areas are alluded to within the plan but are so significant that we believe that they warrant further exploration and articulation to generate positive action and validate the poor past experiences of disabled people and their lack of involvement in key decision-making processes in the past. The inclusion of the short-term plan is helpful in illustrating what are seen as priority actions but it would be good to see how these are reflective of urgent need and how the voices of disabled people have been included and meaningfully considered in the formulation of the areas of focus.

Q4. The 'actions document' sets out the short-term steps we are taking now. There will be more actions by future governments to support us to achieve the long-term outcomes. Please tell us whether you think these short-term actions will help deliver the long-term outcomes? Will these actions help reduce the problems and barriers that disabled people face? Please give reasons for your answer if possible.

We agree that the short-term actions will help to deliver the long-term aims of the plan but without specific information around timescales and key stakeholders that will be involved it is difficult to be certain that the change delivered will be focused in the right direction. Disability covers such a broad range of needs that it may be helpful to be clearer about which areas you are prioritising in relation to each short-term action.

We are extremely pleased to see that suitable accommodation for disabled survivors who are fleeing violence and abuse has been identified and we would ask for this to be amended to say 'The Welsh Government to work with local authorities and specialist service providers to improve the provision of accessible accommodation for disabled people, their carers, and their children when fleeing from violence.' Making this change more clearly identifies specialist services as the organisations best placed to consult on and provide services for survivors of VAWDASV.

We are also pleased to see that providing disabled survivors and victims, with equal access to appropriately resourced, high quality, needs led, strength based, intersectional and responsive services across Wales has been included. Welsh specialist VAWDASV services who hold Welsh Women's Aid's National Quality Service Standards are required to demonstrate the accessibility and provenance of their services to achieve this award and we would welcome the opportunity to work alongside the Welsh Government to further expand the work of the sector in this area. We would like some capital provision to be made available within VAWDASV commissioning which enables services to be able to dedicate more resource to translation, interpreting and service adaptations which may be prevented by current budgetary restraints. This would enable specialist services to support the government better to achieve its aims and reduce the impact of violence against women domestic abuse and sexual violence within our communities more equitably.

Q5. Will the proposed outcomes set out in 'Neighbourhoods and Places' help reduce the problems and barriers that disabled people face? What, if anything, should be added or

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removed from these outcomes? Please give reasons for your answer if possible.

It is very positive to see the proposed intention to improve emergency accommodation for disabled people. We would like to see some further clarity around how these changes can be achieved and whose the responsibility will be to adapt existing provision. Currently, the commissioned models of emergency and second stage VAWDASV accommodation are delivered through a combination of independently owned, RSL owned and local authority properties (not exhaustive) and we would welcome the opportunity to work more closely with the Welsh Government's VAWDASV Team and local commissioners to ensure that the financial burden of vital changes does not fall solely at the door of specialist services, the majority of whom are charities of limited means but ultimately best placed to deliver the vital services that disabled survivors have every right to access.

In addition, we would like to see a further outcome around inclusive design being standardised in new housing developments so that we can fully integrate our communities and give equitable opportunities that do not limit where disabled people can live on the basis of housing stock and their own financial means.

Linked to independent living, when anyone receives communication from health, housing or local authorities there is currently a general assumption made that the person receiving the letter understands English and that English is their first language, this is not always the case. We would like to see further plans to ensure that individual communication needs are recorded and acted on by organisations and the appropriate methods used to contact people. For example, a Deaf person may receive a confidential letter asking them to use telephone helplines to address their needs, but they may not understand its content. They may then have to ask friends or family to read the information and make the call, neither of which serves their right to privacy. If communication needs were thoroughly considered and taken into account then interpreter provision could be prebooked to enable individuals to be fully informed and independent.

Q6. Will the proposed outcomes set out in 'Employment, Income and Education' help reduce the problems and barriers that disabled people face? What, if anything, should be added or removed from these outcomes? Please give reasons for your answer if possible.

We are pleased to see a commitment to inclusive employment and education, addressing barriers to income and reducing socioeconomic inequality. The effects of austerity also have a disproportionate impact on those with disabilities and this needs to be recognised. This has been exacerbated by the lengthy and complicated process of claiming disability benefits and Access to Work grants. The UK government have expressed an aim to achieve an 80% employment rate <https://www.gov.uk/government/statistics/theemploymentofdisabledpeople2024/theemploymentofdisabledpeople2024>, however we firmly believe that this must be long term employment that provides adequate financial stability and satisfaction for disabled people. Research indicates that as much as 50% of the employment undertaken by disabled people is low in pay, parttime or even short-term <https://www.theguardian.com/society/2019/jun/05/austeristyforcingdisabledwomenintosexwork>. Failing to achieve this goal adequately may mean that disabled people will be put at

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disproportionate risk of exploitation or abuse, for example turning to survival sex or remaining with a perpetrator of abuse due to lack of financial independence. This is of particular relevance in relation to women exploited by the sex industry as some figures suggest that 50% of those involved in sex work identify as disabled. One disabled respondent to research conducted by the University of Bristol survey notes of their experience: "A way of surviving while being disabled, since I can work for only a few hours a week or even a few hours a month if that's all I can manage, and manage to pay the rent." [1] [1] In terms of education, we believe that it is really important to make sure that all teachers who teach using BSL have achieved the appropriate standard BSL qualification. It is well documented that the average reading age of a Deaf person leaving education in the UK is age 8 and if teachers have a lesser qualification this could be damaging to the Deaf individuals and the academic progress that they could make. We would advocate for this to be true for all education levels and also for work based training that may aid access to employment.

We would also like to see this part of the plan be joined directly to the work that is ongoing around the delivery of the RSE curriculum. Differentiated resources, content and delivery styles will be vital to the success of this work and the connectivity of the two pieces of guidance will ensure that they are not developed or delivered in isolation.

[1] The nature and prevalence of prostitution and sex work in England and Wales today, October 2019
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/82920/Prostitution_and_Sex_Work_Report.pdf

Q7. Will the proposed outcomes set out in 'Independent Living' help reduce the problems and barriers that disabled people face? What, if anything, should be added or removed from these outcomes? Please give reasons for your answer if possible.

Outcomes 2 and 3 talk about inclusive accessible housing including for those experiencing homelessness and/or fleeing violence. As per our previous comment, we advocate this aspiration must be reflected in the commissioning of refuge and settled accommodation through ringfenced and appropriate funding to enable specialist services to offer the accessibility for this to be achieved. We are also clear that any changes in practice and guidance must consider the broad range of disabilities and recognise that accessibility does not just mean physical accommodations / accessibility and commissioners should consult with those with lived experience in order to inform appropriate intersectional commissioning of supported accommodations.

We wish it to be noted that Outcome 4, inclusive policy, must include broader recognition of risk as current definitions and threshold of homelessness is often too narrow for those experiencing harm and abuse. Vulnerable adults may be at risk of cuckooing or other exploitative housing situations such as sofa surfing and so called 'sex for rent'. Our specialist Members have fed back these risks are not always understood or accounted for within current housing processes, with some local authorities insisting that as the vulnerable adult technically has a tenancy, they cannot be considered, despite the safeguarding risks evident.

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Outcome 5 currently wishes that “Housing services and support for disabled people are well governed ...”. This is a very narrow acknowledgement of need as many disabled people are living in supported accommodation that isn’t necessarily ‘housing for disabled people’, similarly, many people will come into contact with housing services but for nondisability related reasons perhaps (thinking about neurodivergence etc). What may be more helpful and effective is to consider rewording the passage to reflect that all housing services should be responsive to the needs of disabled people – and held accountable through monitoring etc with outcomes like are they are training their staff, embedding questions around disability in their risk/eligibility assessments etc.

Currently there is an overreliance on children to provide support for the needs of their disabled parents. Whilst many children are effective and skilled carers, this may come at the cost of the child’s own education and wellbeing. We would like to see the plan moving towards further provision being put in place to ensure more accessible support is embedded within social care so that children do not have to pick up that responsibility or at least more provision to reduce their duties so that the child can enjoy the same level of opportunity as their peers who do not have additional responsibilities.

Q8. Will the proposed outcomes set out in ‘Justice and Supporting Environments’ help reduce the problems and barriers that disabled people face? What, if anything, should be added or removed from these outcomes? Please give reasons for your answer if possible.

Outcome 3 specifically outlines “violence, sexual abuse and domestic violence” within its scope and whilst we appreciate that this is a purposely broad outcome to encompass the many forms of harm and abuse that may be perpetrated against disabled people we would seek the addition of the definition to encompass all forms of VAWDASV – including FGM, forced marriage, sexual exploitation, financial and coercive control. Some of these abuses may be lesser known within some communities but they undoubtedly still exist and raising awareness in this way may help to open up understanding, conversation and action.

A notable concern within Policing, Criminal, Civil and Family Justice is the availability of appropriately trained BSL interpreters. We advocate for clearer guidelines around the use of official interpreting services and also for a strategy that addresses expanding the provision. Deaf survivors of abuse, awaiting court cases due to CPS delays, are often further hindered by the availability of independent interpreters. This is in addition to the barriers that exist which prevent cases from even getting to court in the first place and we would see this as a clear priority for this theme. We would also wish for greater funding and capacity to be available to specialist VAWDASV services in order to pay for interpreters and Video Relay Systems to enable greater interaction with support and social justice. There is an increasing body of evidence to show that trauma, ACES and experiences of abuse/exploitation can lead to lifelong health issues, this understanding must be embedded into action plans and policies to prevent the overmedicalisation and pathologisation of trauma and to support and promote a more social and holistic model. The definition of disability within the plan does incorporate those who are born and acquire disabilities however we would wish for this to be illustrated to a greater extent so that other services who will be implementing plans do not focus their efforts on medical approaches.

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Q9. We have outlined in the Disabled People's Rights Plan how the actions and outcomes support the principles set out in the UNCRDP. Do you think that the plan promotes the main principles of access to rights and inclusion within the UNCRDP? Please give reasons for your answer if possible.

Yes, we believe that these align suitably

Q10. The final section of the Disabled People's Rights Plan sets out the arrangements for the governance, monitoring, and evaluation of the plan. This means checking how the plan is working, making sure it is going well, and measuring how well the plan is improving the lives of disabled people. Do you think any other governance, monitoring or evaluation mechanisms should be considered?

We are pleased to see the level of detail included to explain the monitoring, governance and evaluation of the plan. We are keen to understand what the monitoring of the actions delivered to achieve the plan looks like for Local Authorities, Health Boards and Policing and any associated funding that enables them to effectively do this.

We would be keen to participate to represent the voices of specialist VAWDASV services and reflect their contributions to furthering the VAWDASV specific aspirations of the plan.

Q11. What do you think the likely effects of the Disabled People's Rights Plan will be on deaf British Sign Language (BSL) signers? We are particularly interested in its potential impact on opportunities to use BSL in Wales.

**How will the plan help to promote and strengthen the use of BSL in Wales?
How will the Plan help to break down barriers for BSL signers in accessing information and services?**

Collaboration and engagement with the D/deaf community and organisations who work with the D/deaf community will be critical to effecting positive impact on the promotion and strengthening of BSL use in Wales. We believe that many of the aspects covered under each theme will lead statutory and specialist provision to be more accessible by design but this in isolation will not be sufficient to address it entirely. We would wish to see clearer links with the campaign to enact BSL legislation in Wales and to address the capacity, availability and cost of interpreting services across all areas. Technological advancements are enabling services to provide better publicfacing resources for the deaf community which use captioning however the difficulties that deaf people face when trying to coordinate face to face appointments are still persistent and problematic. Welsh Women's Aid have been developing VAWDASV training for BSL Interpreters, statutory services and specialist VAWDASV services over the past 3 years and actively delivering this over the past 18 months. Within this time, considerable inroads into addressing accessibility issues have been made and further information

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about the work we have done around deaf inclusion can be found on page 20 of this document WAVE_fempower240918_web.pdf. One of the clear messages that has come out of this work is that there is still a great deal of distance to travel until we reach a point where deaf, and disabled, survivors of abuse who communicate using BSL have equitable access and experiences of support across health, social care, Justice and specialist support but the foundations have been laid upon which the plan can build.

In relation to the consultation, we are pleased to see the resources available in BSL but we are unsure as to the provision that has been made for people to contribute to the consultation in BSL. True accessibility involves ensuring that that people, as well as information, can be understood and it would be good to know how to contribute with this in mind. We would also like to understand where the terms BSL Signers and BSL Community have originated as these are terms unfamiliar to members of the deaf community that we have spoken to.

Q12. What, in your view, would be the likely effects of the Disabled People's Rights Plan on the Welsh language? We are particularly interested in likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Do you think that there are opportunities to promote positive effects in regard to Welsh Language in the plan?

Do you think that there are opportunities to reduce unhelpful effects on the Welsh language in the plan?

We believe that all adapted documents and resources (such as Easy Read versions) should be available in Welsh. We would also advocate that Welsh speaking experts by experience are sought for all collaborative opportunities.

Q13. We have asked you specific questions about the Disabled People's Rights Plan. If you have anything else about any part of the plan you would like to tell us, please use this space to let us know.

We do not have anything further to add.

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