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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 (comprising our membership of specialist services and members of the regional VAWDASV Specialist Services Providers Forums).¹ These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors.

We also deliver direct services including, for example, the Welsh Government funded Live Fear Free Helpline and a National Training Service partnership. . We are piloting the Survivors Empowering and Educating Services (SEEdS) project, which is empowering survivors of violence and abuse to collectively influence and inform improvements in public services and commissioning frameworks, and help change attitudes.

We also deliver the Wales National Quality Service Standards, 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/>)



Summary of recommendations:

- Welsh Women’s Aid is concerned that there is too much of a focus on domestic abuse for much of the indicators and measures and this needs to be widened to all forms of violence against women, domestic abuse and sexual violence (VAWDASV). More needs to be done to look at how the wider VAWDASV agenda can be considered through these objectives and how survivors of other forms of VAWDAV are impacted and supported.
- There is also an overreliance on criminal justice as a data source for the indicators and measures, which will only reflect a narrow cohort of survivors and perpetrators. Welsh Women’s Aid and Live Fear Free helpline data should be fully utilised in the Indicators and Measures to give a more comprehensive picture of VAWDASV in Wales.
- More consideration needs to be given to how both survivors and perpetrators are ‘picked-up’ sooner by using data sources which measure earlier intervention.
- Welsh Women’s Aid is concerned that the indicators related to perpetrators, services and training have not considered quality of the delivery of these provisions or the measurements of outcomes for them.
- Data from accredited perpetrator programmes should be used to measure outcomes as well as a measure of the availability of accredited programmes for both high risk and ‘lower risk’ perpetrators, across Wales. Additionally, feedback from survivors whose perpetrators have been identified for behaviour change programmes should also be sought.
- As gender inequality is a cause and consequence of VAWDASV, activity on how attitudes to this are being challenged and prevented should be measured. Welsh Women’s Aid is calling for additional indicators that look at the changing of attitudes to VAWDASV, increased referrals from the public sector and a measure of support outcomes.

<p>Question 1</p>	<p>Do you agree or disagree that the proposed set of indicators, as a whole, fully assess whether progress is being made in achieving the Objectives outlined within the VAWDASV National Strategy?</p> <p>Welsh Women’s Aid is concerned that some of the indicators will not be able to assess whether progress has been made towards achieving the Objectives set out. We are concerned that there is a lack of consideration for measuring improvements in the devolved public sector where there are direct duties under the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (the Act). Additionally, there is a need to collect Wales specific data and to expand on the data currently being collected. We are also concerned that the indicators only include one measure related to children and young people impacted by VAWDASV.</p> <p>Under Objective 1, an increase in reporting does not necessarily indicate that there is an increase in awareness. This point is detailed further in our response under question 2. Objective 1 also requires an additional measure: how attitudes to VAWDASV are being challenged, again detailed further under question 4.</p> <p>Additionally, Indicator 5, which refers to an increase in VAWDASV related incidents resulting in arrest, is a narrow indicator for Objective 3, which looks at holding perpetrators to account. This should be wider, with an expectation that other</p>
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	<p>statutory agencies and the wider public play a role in holding perpetrators to account.</p> <p>Indicator 9, ensuring victims receive appropriate support, under Objective 10, focuses on equal access to services across Wales. We would insist that the indicator should specifically name violence against women, domestic abuse and sexual violence specialist services in order to meet the objective of ‘needs led, strength based, gender responsive services’.</p> <p>Finally, under Indicator 10, ‘increased confidence and access to justice’; we are concerned that currently the criminal justice response to survivors is not always needs-led or gender responsive. However, we hope that changes indicated in the new Domestic Violence Bill from UK Government, including ending cross-examination in the courts by perpetrators and presumed special measures, will improve the experience. Our comment on this is detailed further under question 6.</p>
<p>Question 2</p>	<p>Are there any indicators proposed that you think can be improved? Please confirm you have used the template provided at Annex B</p> <p>Annex B completed</p> <p>Indicator 1 doesn’t reflect Objective 1 which is to increase awareness and challenge attitudes. An increase in reporting to agencies doesn’t measure this objective. We responded to proposed indicators in November 2018 and suggested this is changed to looking at an increase in contact with services – such as specialist VAWDASV services and the Live Fear Free helpline as well as calls to ChildLine to help capture concerns from/about children and young people. We would therefore recommend that data is collated from the Live Fear Free helpline and our national network of specialist services on the number of people accessing services. Additionally, Indicator 1 proposes measuring increased <i>reporting</i>. Reporting does not indicate awareness or changes in attitude, particularly as the suggested data source is Police Recorded Crime Data. It is well documented that not all survivors of VAWDASV report to the police, therefore an increase in awareness may not be captured via this route. Indicators focused on criminal justice data only focuses on high risk cases, whereas data collated by Welsh Women’s Aid membership and the Live Fear Free helpline is the biggest data set of Wales specific data so should be utilised for a number of the indicators. We would also call for a measurement of referrals made by public services such as schools, social services and housing teams for example, which also have a duty under the Act. This is also an opportunity to measure the impact of the Don’t Be a Bystander campaign; looking at the differentiation made between victim reporting and third party reporting.</p> <p>We are very concerned that the indicators related to perpetrators, services and training have not considered quality of the delivery of these provisions or the measurements of outcomes for them. As most services are expected to deliver outcomes to funders – this should be collated here as well.</p>

<p>Question 3</p>	<p>Are there any indicators proposed that you think should be excluded?</p> <p>Welsh Women’s Aid feels Indicator 5, ‘related incidents resulting in an arrest, prosecution or conviction’ should be amended or added to as follows; While we agree that perpetrators of violence against women, domestic abuse and sexual violence should be held to account and the criminal justice system plays an important role in this. We are concerned that arrest, prosecution and conviction alone will not provide an accurate picture. It relies on survivors reporting to the police, which as already highlighted excludes women who do not chose this route and assumes a level of perpetration which reaches the criminal justice system threshold. In addition, it does not consider cases where an arrest is made but no prosecution is pursued by the CPS. It is also in contrast to Objective 4 and Indicator 7 which focuses on early intervention and access to it. We would argue that a truly effective early intervention also includes opportunities for perpetrator’s to address their behaviour at an earlier stage. At Welsh Women’s Aid we are working in partnership with Respect on the Change That Lasts1 model. As part of this, Respect are working to identify and work with men much earlier in their perpetrating journey, disrupting their behaviour in its early stages.</p>
<p>Question 4</p>	<p>Are there any other indicators that you think should be included? Please confirm you have used the template provided at Annex B</p> <p>Annex B completed.</p> <p>We would call for additional indicators that look at the changing of attitudes to VAWDASV, increased referrals from the public sector and that measures outcomes of support – further detail on these are referenced throughout our response.</p> <p>As mentioned under question 1, under Objective 1 we feel an additional indicator should be included specifically related to challenging attitudes. For example, the measure could consider what organisations and agencies are doing to challenge abuse, in both polices which do not condone abuse by employees or users of a service and publicity which explicitly condones abuse and makes it clear it will not be tolerated. Additionally, Indicator 2 should be expanded to consider how members of the public are supported to challenge behaviour.</p> <p>We also feel there should be an additional indicator following indicator 9 under Objective 6, to include the number of children supported by dedicated child support workers in refuges and in the community. Welsh Women’s Aid has long been highlighting the lack of dedicated support for children and young people impacted by VAWDASV and the chronic lack of funding for this specialist work. Therefore an indicator to specifically measure how children and young people are supported when engaging with the specialist sector will help towards an understanding of where the gaps are. The data source should therefore come from the specialist sector.</p>

<p>Question 5</p>	<p>How do you think we should communicate the national VAWDASV indicators with the people and communities of Wales?</p> <p>Consideration should be given to how the indicators relate to people in everyday life and the information made easily available and in an accessible language.</p> <p>The indicators should be communicated to relevant public and statutory agencies and what is expected of them to meet the objectives.</p> <p>For members of the public, the benefits to communities of the indicators should be clear. Models such as Change That Lasts should be included in this.</p>
<p>Question 6</p>	<p>Are the proposed measures appropriate for reporting against the proposed National VAWDASV indicators?</p> <p>We are concerned that some of the suggestions are not entirely measureable and that without stating the quality of provision or expected outcomes, measures, 5, 6, 9 and 10 will not have the outcomes we would hope for.</p> <p>Under Indicator 1 we are pleased to see that so called Honour Based Violence has been included in Measure 1.3. When we responded to the proposed indicators in November 2018 we highlighted that the previous measures only included domestic abuse and sexual violence and that this needed to be expanded on. However, the proposed measures for this indicator are based on Police Recorded Crime Data. This is problematic due to the number of cases not reported to the police. We are also concerned with the subjectivity of how crimes are recorded and how this can vary between staff and across forces. We recommend that the data source should also capture the number of contacts made to the Live Fear Free Helpline as a measure to demonstrate the number of people seeking help or information regarding VAWDASV. Using this as a measure would also help capture all forms of VAWDASV. Additionally, this could be supplemented with data from Welsh Women's Aid and the number of survivors accessing services in Wales via our quarterly data submissions. We would therefore recommend that the data source for Objective 1 is wider (included as mentioned, data from specialist services and the Live Fear Free helpline).</p> <p>We are concerned that Measure 2.1 is innately flawed as it only takes into account physical violence and not other forms of VAWDASV. By asking if people think 'it is always unacceptable to hit or slap a partner' maintains the view that intimate partner abuse is incident based rather than recognising that physical violence is one tactic used within the context of coercive control. The measure is also focused on domestic abuse rather than all forms of abuse. It would therefore fail to capture attitudes to sexual violence, rape, FGM, sexual harassment or online abuse. The measure should therefore look at attitudes to abuse within a wider context. We are pleased that the draft indicators note that Welsh Government may need to consider wider research, which we recommended in our initial feedback in November 2018. We would recommend as a data source surveys of individuals about attitudes to</p>

VAWDASV and a survey of businesses on their approach to gender equality and policies.

Using the Crime Survey for England and Wales is also limiting for this measure, as again it focuses on a narrow understanding of domestic abuse, where there is physical violence and again doesn't consider other forms of violence and abuse.

We welcome the inclusion of Welsh Women's Aid as a data source for Objective 2. However for measure 3.1 we feel measuring the outcomes from school awareness sessions, may give a better understanding of increased awareness than simply measuring attendance at the sessions. The 'issues to consider' under this section also notes; 'young people definition for the indicator purposes would be over 16 years to 24 years'. The measure, therefore, which is focused on school children isn't taking into account the needs of those not in education or training or other youth settings, we are therefore concerned that there are large groups of young people who would not be captured by this measure. We would recommend data collection linked to the delivery of sex and relationship education resources as well as an expectation on schools to evidence their approach to gender equality and SRE. Finally we ask Welsh Government to consider including this indicator as part of Estyn inspections.

We are concerned that measure 4.1 is again limited to domestic abuse and specifically physical violence. We would strongly recommend that this measure also considers sexual bullying, sexual abuse and online harassment and abuse, given the young demographic. In addition, we are again concerned about the use of CSEW data as we feel this would not be an accurate measure of children and young people's attitudes. An alternative measure, therefore, would be to weave this question into school awareness sessions to gather a wider response, ensuring it is tailored to ask about all forms of VAWDASV. Additionally, as suggested in our previous feedback in November 2018, we would recommend utilising the national survey for children linked to the Children's Commissioner work.

Measures 5.1 and 5.2 are also limited to a focus on domestic abuse prosecutions, which is not representative of wider VAWDASV. Additional measures concerning arrests/convictions of other abuse types e.g. rape, sexual offenses, coercive control should also be added to give a more rounded picture of VAWDASV. We are also concerned that these measures alone will not meet Objective 3, which as previously mentioned in this response, does not place an emphasis on other agencies holding perpetrators to account and challenging their behaviour. At Welsh Women's Aid, for example, we are delivering Bystander Initiative training in universities and colleges, which aims to support students to challenge inappropriate behaviour amongst their peers.

The measures as they currently are will also only capture a small percentage of perpetrators, those who reach the threshold for the criminal justice system or those whose survivors wish to pursue a prosecution; we know for example that some demographics of survivors are unlikely to do this, for example older women, women who have had previous negative experience of the criminal justice system or women

with insecure immigration status, to name just a few. We strongly feel that in order to achieve Objective 3, consideration should be given to how a wider group of perpetrator's can be held to account and thus provide an opportunity for more survivor's to be supported and made safer through appropriate perpetrator interventions.

Welsh Women's Aid would also advocate for an additional measure to be included under Objective 3; a measure of improved safety for victim/survivors. In terms of the data source, we would recommend victim satisfaction data is gathered following interaction with a perpetrator programme and data to be made available on court outcomes.

We welcome that Welsh Government recognises the importance of accredited perpetrator programmes and therefore feel the data source for Measure 6.1 should be wider than re-offending rates. This is a very limited measure; Perpetrator programmes, for example have shown that the use of physical and sexual violence decreases dramatically after a successful intervention, but that other, more nuanced, forms of abuse do not decrease at the same rate, although they do decrease². Additionally, many survivors live with abusive partners for years and experience no physical violence. Therefore a drop in re-offending rates is unlikely to give an accurate picture of perpetrator behaviour and whether interventions have worked.

We would therefore recommend that data from accredited perpetrator programmes is used to measure these outcomes as well as a measure of the availability of accredited programmes for both high risk and 'lower risk' perpetrators, across Wales. Additionally, feedback from survivors whose perpetrators have been identified for behaviour change programmes should also be sought.

Additionally, as stated, more should be done to support other statutory agencies and the public to safely hold perpetrators to account. Data could therefore be sourced on how employers manage perpetrators and what social settings, such as bars and other public spaces do to challenge abusive and misogynistic behaviour.

We are pleased that Welsh Government recognises that Measure 7.1 is not an appropriate indicator of an early intervention. We would also argue that Measure 7.2 does not indicate a successful early intervention. IDVA's, like MARAC are specifically for high risk cases of domestic abuse. MARAC and IDVA referrals should be indicators of prevention of further serious harm or death, rather than measures of prevention/early intervention. Additionally, Measure 7.4 and 7.5 will not be the best indicator of an early intervention in cases of forced marriage and so called Honour Based Violence. We urge Welsh Government to therefore utilise the Whole Education Approach guidance to monitor the number of teachers and professionals working with children who are trained in recognising the early warning signs of a

² <https://www.dur.ac.uk/resources/criva/ProjectMirabalexecutivesummary.pdf>

child at risk of female genital mutilation, forced marriage or other forms of so called honour violence. This approach will also support measure 7.5 on the number of safeguarding referrals for those at risk of FGM, however we would suggest this is widened to forced marriage or where there are concerns about young people living with so called honour violence.

Additionally, as gender inequality is a cause and consequence of VAWDASV then activity on how attitudes to this are being challenged and prevented should be measured. Measures should focus on the number and diversity of people reached through awareness raising campaigns as well as number of statutory and public services who are asking about VAWDASV as a matter of routine or targeted enquiry. This can also help build on Measure 8.1 and 8.2. We know that some non-specialist agencies come into contact with survivors of violence and abuse at a much earlier point than the VAWDASV sector and are therefore in a privileged position to spot the signs sooner and therefore intervene at an earlier point. This must be backed up, however with access to early intervention support, from the specialist VAWDASV sector, across Wales.

We would recommend that Welsh Government use the UK Department for International Development (DFID) project to investigate what works to prevent violence against women and girls, as we suggested in our initial feedback in November 2018.

A measure of the effectiveness and existence of community schemes such as Change That Lasts and the Ask Me Ambassadors should also be used. The Change That Lasts project at Welsh Women's Aid will evaluate whether the model assists a system change in its approach to VAWDASV and will measure the progress in a number of ways, focused on the three components of the scheme;

Ask Me; the reach of community ambassadors and their effectiveness in breaking the silence around VAWDASV. This will be measured by monitoring how many individuals benefit from awareness raising activities and how many survivors are signposted and supported to access help.

Trusted Professional; training of non-specialist VAWDASV services to respond to both survivors and perpetrators at an earlier stage, monitored via higher levels of referrals to specialist support services from a more diverse range of non-specialist services and whether the support is needs-led and strength based and therefore in-line with the scheme

Specialist services; support a move from the traditional 'risk-led' approach towards a needs-led strengths based, trauma informed responsive by engaging with organisations to develop tools as well as consultation with survivors to ensure the quickest and most effective route to support. The evaluation will seek to find out how this approach impacts on survivors and if it assists with long term freedom from abuse.

Finally, the number of contacts made to the Live Fear Free Helpline should be measured, as this is arguably earlier in the survivor's journey than when IDVAs or

MARAC becomes involved. For example, the Live Fear Free Helpline collects data on the number of contacts made to the helpline, texts, emails and webchat. This also records who made contact whether survivor or professional and where the professional was calling from, the geographical location of the survivor and reason for the call. It also monitors where referrals were made by the helpline, for example, into refuge.

Under Indicator 8, 'those in relevant jobs trained to recognise and appropriately respond' an additional measure should be included which looks to measure how knowledge has been embedded. This can be done via follow-up sessions with trainees, reviews of practice within organisations, whether there has been an increase in survivors identified by a service and whether priorities within that service has changed. For example, do management recognise the important role the organisation plays in eradicating VAWDASV and have they dedicated time and resources to ensure this is done?

In terms of a data source for Measure 8.2 – the specialist VAWDASV sector will be collating data on training delivered and this will be grouped by type of training. Therefore we are not concerned that training under the National Training Framework will be counted twice. Services will keep a record of the type as well as number of trainings delivered for monitoring and funding purposes. Therefore we would recommend that the data source for measure 8.2 is the specialist VAWDASV sector.

We are concerned that Measure 9.1 would not indicate survivors have access to 'needs led, strength based, gender responsive services'. The indicator as it currently stands will only capture the number of referrals to refuges or community services, but not the quality of the service. Additionally, it will not capture access to other VAWDASV services, such as support for sexual violence or so called hour based violence services. We would therefore advocate that all tenders in Wales include a requirement for specialist services to be accredited with existing standards, for example:

- Welsh Women's Aid National Quality Service Standards for domestic abuse services
- Rape Crisis England and Wales or The Survivors Trust for Sexual Violence
- Imkaan standards for BAME service
- Respect for perpetrator standards.

Measure 9.1 also does not consider the number of survivors who are unable to access services, either because of long waiting lists or because they are unable to be accommodated/supported due to lack of resources. This can be collected by Welsh Women's Aid on behalf of our membership of specialist services and is indeed highlighted by our annual State of the Sector reports³.

Indicator 10 and measure 10.1 should not focus on satisfaction with the criminal

³ <http://www.welshwomensaid.org.uk/wp-content/uploads/2019/01/State-of-the-Sector-2018-Eng.pdf>
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	<p>justice system, but on access to and satisfaction with services for survivors. Feedback should be related to all forms of VAWDASV, whether there has been criminal justice system involvement or not. The data source therefore should focus on survivor feedback collated by specialist services. Welsh Women's Aid collate this from member services, which covers more than 70% of specialist services and every geographic area in Wales.</p>
<p>Question 7</p>	<p>Are there any known 'data gaps'?</p> <p>Yes, data from specialist VAWDASV services has been excluded as well as data from the Live Fear Free Helpline. This data is monitored quarterly and would provide a more relevant picture than relying on the CSEW for example.</p> <p>Welsh Women's Aid suggests the following to address some of the 'gaps'. For example;</p> <p>Objective 1: Number of survivors accessing services through our member services, which could be used to show an increase in reporting. Number of contacts made to Live Fear Free helpline to show the number of people accessing help or information. What or who the referral source is – which could show an increased awareness amongst communities.</p> <p>Objective 2: Data on the number of children accessing the S.T.A.R programme. - (Safety, Trust and Respect) suite of services – a suite of early intervention and prevention services and group programmes for all ages up to 25 years).</p> <p>Objective 3: Referrals to accredited perpetrator programmes via Respect Monitoring of outcomes of these programmes.</p> <p>Objective 4: Focuses too much on high risk cases. Change that lasts data should be utilised here Referral data from public services should be used to show increased responsiveness Measurements for prevention work.</p> <p>Objective 5: In addition to the National Training Framework, Welsh Women's Aid can provide data on the number of children and young people workers trained via S.T.A.R We can also provide monitoring of referrals linked to Ask and Act.</p> <p>Objective 6: Number of National Quality Service Standards accredited specialist services Number of survivors accessing Welsh Women's Aid services Number of survivors unable to access support due to lack of resources</p>

	<p>Number of survivors reporting an increase in sense of safety</p> <p>Number of survivors who felt they were provided with the information and advice they needed to access services and were able to make informed choices</p> <p>Monitoring of outcomes for survivors accessing the above services.</p>
<p>Question 8</p>	<p>Are there any areas that would benefit from additional research (ie. outside the scope of this indicator framework)?</p> <p>In terms of work with perpetrators, as already highlighted we are concerned that the current indicators focus too much on arrest and involvement in the criminal justice system. Research into the effectiveness of other agencies and the wider public safely holding perpetrators to account should be done which looks to see if it helps towards a behaviour change. Additionally, research into how employers manage perpetrators should also be considered.</p> <p>Research into attitudes towards all forms of VAWDASV should be considered to improve on measure 2.1 which currently only considered attitudes towards 'hitting or slapping a partner' – attitudes to all forms of VAWDASV including sexual violence, FGM, harassment etc. may differ as other factors come into play such as attitudes about women putting themselves in unsafe situations or racist views underpinning attitudes towards FGM.</p> <p>Conducting a piece of research into how awareness has increased for children and young people through school awareness sessions will help build an understanding of the effectiveness of the sessions and where improvements might be needed.</p>
<p>Question 9</p>	<p>We would like to know your views on the effects that Draft National Indicators would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be?</p> <p>How positive effects could be increased, or negative effects be mitigated?</p> <p>Welsh Women's Aid is clear that services must be offered in both languages. Survivors must be given the opportunity to express themselves in Welsh but also to speak to someone who understands the context of living in Welsh speaking communities; that it is not just a language but a culture. Welsh speaking staff have highlighted that some Welsh speakers have chosen to disclose in English, even when they know the support/helpline worker is a Welsh speaker – numbers on the amount who have used the Welsh language may be lower therefore than the number who can speak the language – but as mentioned, it is important they can speak to someone who understands the context.</p> <p>Where the Crime Survey for England and Wales has been proposed for gathering statistics, it is not clear if participants are given the opportunity to respond in Welsh. Currently, there is no mention of Welsh (or any other language) provisions under the</p>

CSEW's quality and methodology. In the 2017-18 Crime Survey for England and Wales Questionnaire (from April 2017) "Welsh language need" was identified and recorded. However, it is unclear whether the Welsh speaking participants were subsequently paired Welsh language resources and a Welsh speaking interviewer; or whether this was just an unmet need identified through the Survey. If it is the latter, steps should be taken to address this issue and ensure the survey will be available for participants wishing to respond in Welsh. In addition, should a wider one off survey be conducted, this would also be an opportunity to publicise and permit the participants to respond through the medium of Welsh.

There is an onus on the Welsh Government to ensure that Welsh speakers have the opportunity to respond to these questions in their preferred language; as English speakers would.

We are concerned that the Crime Survey England and Wales website does not have The Live Fear Free Helpline number and only includes the English National DV helpline number (run by Women's Aid Federation England and Refuge). Clearly this does not give consideration to callers who wish to communicate in Welsh⁴.

Objective 2 and its corresponding indicator and measure provides a key opportunity to ensure that there is provision through the Welsh language for Children and Young People (CYP). Clearly, it would be incredibly valuable for CYP to be able to communicate, learn about the importance of healthy, respectful relationship and be able to disclose any concerns in their language of choice.

In terms of perpetrator programmes named under Objective 3, this is an opportunity to ensure perpetrator programmes are offered in Welsh. Currently, Respect can offer 1:1 support to perpetrators in Welsh (North Wales) and services in South Wales have Welsh speakers who can provide support in the medium of Welsh if requested.

All training delivered by Welsh Women's Aid can be offered through the medium of Welsh.

Finally, under Objective 6 equal access to specialist services across Wales, must include access to Welsh language speakers. The Live Fear Free helpline, for example ensures all staff responding to calls are fluent in both English and Welsh. Resources should be made available to ensure all services can provide a bilingual service.

⁴ <http://www.crimesurvey.co.uk/en/FurtherHelp.html>

<p>Question 10</p>	<p>Please also explain how you believe the proposed Draft National Indicators could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.</p> <p>Under Objective 1, Indicator 1 related to reporting, Welsh Women’s Aid would urge that there is a robust way of reporting in the language of Welsh, which is equally as robust as reporting in English (for example there are no stages in the reporting process where a person has to revert to English) and that the Welsh language can be used at every stage of reporting. We would also urge that it is clear that a survivor can disclose in Welsh and that the ability to respond in Welsh is promoted.</p> <p>To reiterate the points made in question 9, where CSEW data is used, ensure Welsh is treated as favourably as English and that participants are able to respond fully in Welsh.</p> <p>Under Object 5, Indicator 8, those in relevant job roles trained to recognise and appropriately respond; we would urge that professionals have access to training in both English and Welsh and ensure that the resources are available for sufficient numbers of Welsh speaking professionals to undergo training to ensure survivors have the option to disclose in Welsh when they make contact with services. If all professionals who are trained are English speaking only, this will disadvantage Welsh language speakers who are more comfortable reporting in Welsh.</p> <p>Finally, under Object 6, Indicator 9, insuring appropriate support is received, we would urge that services have the resources to have equal provision of English and Welsh speakers to support all survivors.</p>
<p>Question 11</p>	<p>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:</p> <p>Please enter here:</p> <p>Overall we are concerned that there is too much of a focus on domestic abuse for much of the indicators and measures and an overreliance on criminal justice as a data source. As highlighted throughout, this will capture a narrow cohort of survivors and perpetrators. More needs to be done to look at how the wider VAWDASV agenda can be considered through these objectives and how survivors of other forms of VAWDASV are impacted and supported. More consideration also needs to be given to how both survivors and perpetrators are ‘picked-up’ sooner by using data sources which measure earlier intervention whether via projects such as Change that Lasts, contact with the Live Fear Free helpline and other specialist services and identification via statutory services.</p>



Annex B: Please use this template if you wish to amend a proposed indicator, if you wish to replace one of the proposed indicators or propose an additional indicator. (complete one form per indicator)

Is the proposed indicator a replacement indicator or an improvement to an existing indicator? Please tick one box:

Replacement *Improvement New

*Improvement can include changes to proposed measures or additional/changes to data sources

Which indicator does this proposed indicator improve upon or replace?

Indicator 1

What is the name of replacement or new indicator?

Increase in contact with services

What is the proposed measure(s) for the replacement indicator?

We propose measuring an increase in contact with specialist services and the Live Fear Free helpline.

What is the data source for this Measure?

We recommend the data is collected from the Live Fear Free helpline and Welsh Women’s Aid national network of specialist services of the number of people accessing services.

Which one of the 6 VAWDASV National Strategy Objectives does the proposed replacement, improvement or new indicator report against?

Objective 1

Please provide an explanation for why this indicator best measures the Objective of the Violence against Women, Domestic Abuse and Sexual Violence National Strategy in line with the criteria identified in Section 3.

We feel an increase in reporting to agencies doesn’t measure objective 1. Reporting does not necessarily indicate a change in attitude, particularly as the suggested data source is Police Recorded Crime Data. As not all survivors do not report to the police, therefore an increase in awareness may not be captured via this route. Indicators focused on criminal justice data only focuses on high risk cases, whereas data collated by Welsh Women’s Aid membership and the Live Fear Free helpline is the biggest data set of Wales specific data.



Annex B: Please use this template if you wish to amend a proposed indicator, if you wish to replace one of the proposed indicators or propose an additional indicator. (complete one form per indicator)

Is the proposed indicator a replacement indicator or an improvement to an existing indicator? Please tick one box:

Replacement *Improvement New

*Improvement can include changes to proposed measures or additional/changes to data sources

Which indicator does this proposed indicator improve upon or replace?

Indicator 9

What is the name of replacement or new indicator?

Support provided to children and young people

What is the proposed measure(s) for the replacement indicator?

Data on the number of children and young people directly supported by specialist children’s workers within the VAWDASV sector.

What is the data source for this Measure?

The specialist VAWDASV sector

Which one of the 6 VAWDASV National Strategy Objectives does the proposed replacement, improvement or new indicator report against?

Objective 6

Please provide an explanation for why this indicator best measures the Objective of the Violence against Women, Domestic Abuse and Sexual Violence National Strategy in line with the criteria identified in Section 3.

Indicator 9 only states that ‘victims should receive appropriate support’ we feel a separate objective which measure the appropriate support for children and young people is essential here.



Annex B: Please use this template if you wish to amend a proposed indicator, if you wish to replace one of the proposed indicators or propose an additional indicator. (complete one form per indicator)

<p>Is the proposed indicator a replacement indicator or an improvement to an existing indicator? Please tick one box:</p> <p>Replacement <input type="checkbox"/> *Improvement <input type="checkbox"/> New <input checked="" type="checkbox"/></p> <p>*Improvement can include changes to proposed measures or additional/changes to data sources</p>
<p>Which indicator does this proposed indicator improve upon or replace?</p> <p>An additional indicator should be included concerned with challenging attitudes</p>
<p>What is the name of replacement or new indicator?</p> <p>Challenging attitudes to VAWDASV</p>
<p>What is the proposed measure(s) for the replacement indicator?</p> <p>Consider what organisations are doing to challenge abuse</p>
<p>What is the data source for this Measure?</p> <p>Number of workplace policies and training received by organisations</p>
<p>Which one of the 6 VAWDASV National Strategy Objectives does the proposed replacement, improvement or new indicator report against?</p> <p>Objective 1</p>
<p>Please provide an explanation for why this indicator best measures the Objective of the Violence against Women, Domestic Abuse and Sexual Violence National Strategy in line with the criteria identified in Section 3.</p> <p>Challenging attitudes and behaviour is an important part of the overall work to eradicate VAWDASV. It helps to create a culture that does not condone abuse, which in time should lead to less people using violence and abuse.</p>



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<p>Which indicator does this proposed indicator improve upon or replace?</p> <p>A measure of victim satisfaction</p>
<p>What is the name of replacement or new indicator?</p> <p>Satisfaction levels of survivors following interaction with perpetrator programmes</p>
<p>What is the proposed measure(s) for the replacement indicator?</p> <p>Satisfaction levels</p>
<p>What is the data source for this Measure?</p> <p>Victim satisfaction data gathered following interaction with a perpetrator programme and data available on court outcomes.</p>
<p>Which one of the 6 VAWDASV National Strategy Objectives does the proposed replacement, improvement or new indicator report against?</p> <p>Objective 3</p>
<p>Please provide an explanation for why this indicator best measures the Objective of the Violence against Women, Domestic Abuse and Sexual Violence National Strategy in line with the criteria identified in Section 3.</p> <p>In order to truly understand if a perpetrator programme has been successful, it is vital that the victim/survivors view is measured – whether they feel satisfied with the outcomes, their wellbeing and sense of safety.</p>



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<p>Which indicator does this proposed indicator improve upon or replace?</p>
<p>What is the name of replacement or new indicator?</p> <p>Knowledge of and response to VAWDASV improved following training</p>
<p>What is the proposed measure(s) for the replacement indicator?</p> <p>How knowledge has been embedded for those who have been trained to spot the signs of VAWDASV</p>
<p>What is the data source for this Measure?</p> <p>Data on outcomes of follow-up sessions with trainees and whether there has been an increase in survivors identified by a service</p>
<p>Which one of the 6 VAWDASV National Strategy Objectives does the proposed replacement, improvement or new indicator report against?</p> <p>Objective 5</p>
<p>Please provide an explanation for why this indicator best measures the Objective of the Violence against Women, Domestic Abuse and Sexual Violence National Strategy in line with the criteria identified in Section 3.</p> <p>Training staff is only a part of the solution, it is important to understand if the knowledge gained from training has been embedded and practice changed within an organisation in order to have an impact on survivors engaging with services – for example, do management recognise the important role the organisations plays and have they therefore dedicated resources to it and has this resulted in more enquiry or disclosure?</p>



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<p>Which indicator does this proposed indicator improve upon or replace?</p> <p>Indicator 10 and measure 10.1.</p>
<p>What is the name of replacement or new indicator?</p> <p>Access to and satisfaction with services.</p>
<p>What is the proposed measure(s) for the replacement indicator?</p> <p>How many survivors are able to access services and how whether the intervention was successful.</p>
<p>What is the data source for this Measure?</p> <p>The data source should focus on survivor feedback collated by specialist services.</p>
<p>Which one of the 6 VAWDASV National Strategy Objectives does the proposed replacement, improvement or new indicator report against?</p> <p>Objective 6</p>
<p>Please provide an explanation for why this indicator best measures the Objective of the Violence against Women, Domestic Abuse and Sexual Violence National Strategy in line with the criteria identified in Section 3.</p> <p>Indicator 10 should not just focus on satisfaction with the criminal justice system as this is a narrow measure and will not capture satisfaction for survivors who do not go down this route. Feedback should consider all forms of VAWDASV.</p>

ⁱ Our membership of third sector violence against women, domestic abuse and sexual violence specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated includes: Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid,



Clwyd Alyn Housing Association (CAHA) Women's Aid, Stepping Stones, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU), Gorwel (Grwp Cynefin), Montgomeryshire Family Crisis Centre, Newport Women's Aid, North Denbighshire Domestic Abuse Service, Port Talbot & Afan Women's Aid, RCT Women's Aid, Safer Wales (including Dyn Project), Swansea Women's Aid, Threshold, West Wales Domestic Abuse Service and Rape and Sexual Abuse Support Centre (RASASC) North Wales.