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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

¹ Our membership of 22 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.

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collectively influence and inform improvements in public services and commissioning frameworks, and help change attitudes.

We also deliver the Wales National Quality Service Standards (NQSS), a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found here: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)

Welsh Women's Aid response to UK Government Consultation on 'a new legal duty to support a multi-agency approach to preventing and tackling serious violence'

Summary of Recommendations

- We urge UK Government to acknowledge and act on the very clear cross-overs and drivers behind serious violence in the context of gangs and violence against women and girls.
- We call for more direct links between violence against women and other forms of serious violence and the gendered experiences of women and girls impacted by gang culture.
- Best practice examples from the coordinated community response to tackling violence against women must be considered should a public health approach be adopted for serious violence
- Women and girls are sexually exploited and raped in gang cultures, because of their gender – to not address this is to leave vulnerable young women and girls exposed to further violence.
- Women and girls are uniquely impacted by drug running and cuckooing – where they are exploited sexually or via an abusive partner – there must be targeted measures in place to protect them.
- The UK is a high value, low risk destination for organised sex trafficking – we urge UK Government to adopt an 'end demand' legislative framework, or Nordic Model.

Welsh Women's Aid submits the following in response to UK Government's 'A new legal duty to support a multi-agency approach to preventing and tackling serious violence' consultation. Rather than complete the full consultation, we have drafted the following to highlight our concerns about the lack of strong links within this area, with work to end violence against women and girls (VAWG). We urge UK Government to acknowledge and act on the very clear cross-overs and drivers behind serious violence and VAWG.

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Welsh Women's Aid is concerned that to not address 'sexual abuse, modern slavery or VAWG'² in this strategy is to ignore the gendered experiences of women and girls impacted by gang and serious violence, and to miss an opportunity to address one of the most important elements of these crime types. 'Young people with intra-familial abuse in their histories, or those living with domestic abuse, are also said to be more vulnerable to peer-on-peer abuse'³. While we appreciate there are specific strategies to address violence against women and girls and not all the drivers of serious violence will be the same as violence against women and girls, there is a gendered element to these crimes based on inequality. Therefore we would like to see more direct links and a cross-over of strategies.

We feel there is an opportunity presented through a 'public health' approach for cross-over of these agendas. Multi-agency working is common place within the violence against women sector. The coordinated community response works on the premise that agencies from across sectors must work together in order to tackle violence and abuse, including; health, police, housing, probation etc. Should a similar approach be taken for other forms of serious violence, clearly there is an opportunity for sharing of best practice and intelligence with the specialist sector, where appropriate.

Welsh Women's Aid is clear that the primary driver of violence against women and girls is gender inequality, male entitlement and toxic masculinity. It is disproportionately perpetrated by men because of this and women are disproportionately impacted because of male entitlement to power and control. The strategy itself recognises that the rise in knife crime, gun violence and homicide is being driven by male offending, which can often be linked with toxic masculinity. Additionally, the strategy also recognises there are specific risk factors that can impact on 'an individual's susceptibility to becoming a victim or perpetrator of serious violence, including domestic abuse'⁴. We are concerned that to not consider the factors which lead to VAWG and other serious violence as linked, is to not fully address the causes of such violence, and indeed, does not do enough to protect the people impacted by it. Carlene Firmin's *MsUnderstood Project* has found 'young people have experienced physical, sexual and emotional abuse by peers as a means of survival in gang affected neighbourhoods'⁵. Her research on Peer-on-Peer abuse is clear that work in this area must cut across the definitions of domestic abuse and serious youth violence, amongst others: 'it is possible...that a young person could be sexually exploited by a partner who is gang associated...and who has also been physically abusive'⁶.

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/791253/SV_Legal_Duty_Consultation_Document.pdf

³ Carlene Firmin and George Curtis – What is Peer on Peer abuse? Page 3

<http://www.msunderstood.org.uk/assets/templates/msunderstood/style/documents/MSUPB01.pdf>

⁴ Op Cit

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/791253/SV_Legal_Duty_Consultation_Document.pdf

⁵ Op Cit, Carlene Firmin and George Curtis, page 2

⁶ Ibid, page 3



A report from the Centre for Social Justice⁷ found that girls and young women are specifically exploited within gang cultures, because of their gender. Both being used as drug carriers and being sexually exploited. Rape is used as a weapon within gang cultures, where girls are raped as part of initiations for new male gang members, girls are also targeted for 'revenge rape' by rival gangs. Again this highlights the unique experiences of girls and young women impacted by gang culture and the unique experiences of serious sexual violence and exploitation they are subjected to. It is clear that not addressing this within a new strategy on serious violence, would leave vulnerable young women and girls exposed.

We have previously highlighted our concerns about drug running in our response to the [Home Affairs](#) Select Committee evidence on modern slavery. In our evidence, we emphasised the added risk young women face; they may be sexually groomed and coerced into relationships with gang members and then exploited sexually or pimped out to settle drug debts. Welsh Women's Aid is also concerned about the act of 'cuckooing' (taking over a person's home as a base for drug dealing), where dealers form a 'relationship' with a vulnerable woman in order to exploit her home. This can lead to domestic abuse, rape and sexual exploitation as well as imprisonment, domestic servitude and/or homelessness.

In that same response, we again highlighted concerns about sexual exploitation. This is estimated to cost the UK at least £247.6 million⁸ each year and is the most common form of reported slavery in the UK. At the same time sex trafficking is making criminals a significant amount of money and it is often managed through organised gangs. An inquiry into organised sexual exploitation conducted by the All-Party Parliamentary Group⁹ (APPG) on Prostitution and the Global Sex Trade in 2018 concluded that the UK is currently a low risk, high value destination for sex traffickers. In Wales, there is welcome reference made in the Welsh Government National Strategy¹⁰ for Violence against Women, Domestic Abuse and Sexual Violence 2016-2021 and its subsequent delivery framework to alignment between modern slavery and women exploited in the sex industry. However, we would recommend the adoption by the UK Government of an 'end demand' legislative framework, often referred to as the Nordic model or Sex Buyer Law¹¹.

The experiences of women and girls within gang culture is gendered, where they are far more likely to be sexually exploited and raped. This exploitation appears to be happening across the various forms of criminality within the context of serious violence and gang culture. We therefore reiterate the

⁷ <https://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2016/08/Girls-and-Gangs-FINAL-VERSION.pdf>

⁸The Economic and Social Costs of Modern Slavery, Sasha Reed, Stephen Roe, James Grimshaw and Rhys Oliver https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729836/economic-and-social-costs-of-modern-slavery-horr100.pdf page 6

⁹Behind Closed Doors; Organised sexual exploitation in England and Wales, An inquiry by the All-Party Parliamentary Group on Prostitution and the Global Sex Trade <https://appgprostitution.uk/wp-content/uploads/2018/05/Behind-closed-doors-APPG-on-Prostitution.pdf> page 20

¹⁰ <https://gweddiill.gov.wales/docs/dsjlg/publications/commsafety/161104-national-strategy-en.pdf>

¹¹ <https://appgprostitution.uk/wp-content/uploads/2017/09/How-to-implement-the-Sex-Buyer-Law-in-the-UK-2016.pdf>

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points made above that UK Government reconsiders its stance and looks to include violence against women within this strategy.

Welsh Women's Aid would like to thank UK Government for the opportunity to provide feedback on this important issue. We would also be happy to provide further oral or written evidence, if required.

Any comments or questions regarding our response can be directed to:

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