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## Supporting People Programme Guidance and Outcomes Framework Welsh Women's Aid Consultation Response

### About Welsh Women's Aid

Welsh Women's Aid is the umbrella membership organisation in Wales that supports and provides national representation for the 23 independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (our membership of specialist services<sup>1</sup>). These services deliver life-saving and life-changing support and preventative work in response to violence against women, domestic abuse and sexual violence, as part of a network of UK provision.

Our primary purpose is to prevent domestic abuse 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 governments, public, private and third sector services and in communities, for the benefit of survivors. This includes advising and supporting commissioners and strategic leads in their development of VAWDASV needs assessments and strategic plans, promoting evidence for innovative new service models, and supporting research into the prevention of abuse.

Some of the many services we deliver for members include facilitating the involvement of member services' in relevant policy, legislative and strategy developments and encouraging co-production in service development; providing advice and information on the development and delivery of promising practice in the sector; providing support with policy and practice matters, and regional and national data analysis reports to support local needs assessments, strategy and commissioning developments.

We also deliver direct services including the Welsh Government funded Live Fear Free Helpline; a National Training Service; the national Children Matter programme of work which, for example, supports local services to help children and young people affected by abuse and to deliver preventative Safety, Trust and Respect (STAR) programmes across Wales, and refuge and advocacy services in Colwyn Bay and Wrexham. We are piloting Survivors Empowering and Educating Services (SEEdS) project which is empowering survivors of violence and abuse to collectively influence and inform

<sup>1</sup> Our membership of 23 third sector VAWDASV specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated: *BAWSO, Hafan Cymru, Safer Wales incl. Dyn Project, Llamau, Cardiff Women's Aid, Cyfannol, Newport Women's Aid, Port Talbot & Afan Women's Aid, Swansea Women's Aid, Threshold, Atal Y Fro, Women's Aid RCT, Calan DVS, Carmarthen Domestic Abuse Service, West Wales Domestic Abuse Service, Montgomeryshire Family Crisis Centre, Aberconwy Domestic Abuse Service, Bangor & District Women's Aid, Chwyd Alyn Housing Association Domestic Abuse Service, Domestic Abuse Safety Unit (DASU), Glyndwr Women's Aid, Gorwel (Grwp Cynefin) and North Denbighshire Domestic Abuse Service (NDDAS).*



services and commissioning frameworks, and help change public and community attitudes.

We also deliver the Wales National Quality Service Standards, a national accreditation framework for domestic abuse specialist services in Wales (supported by Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks with which we collaborate. (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 recommends the draft guidance and outcomes framework for the Supporting People Programme Grant (SPPG):

1. Ensure that commissioners and providers understand that a person centred approach outlined in the guidance must be gendered and incorporate specialist support for BME communities and is fully integrated throughout the commissioning process and delivery and ensure that the approach is fully resourced.
2. Ensure the eligibility criteria provides clarity on SPPG covering support for children and young people who have been abused and need to access housing support to recover from the impact of domestic abuse and sexual violence.
3. Strengthen the eligibility criteria so that it clearly recognises that local connection criteria is not appropriate for refuge-based support services and other VAWDASV accommodation services.
4. Remove the reference to public funds from the eligibility criteria, to reflect the previous guidance and ensure persons with no recourse to public funds can continue to access the same support as they currently can under the immigration rule definition of public funds.
5. Carry out and publish an Equality Impact Assessment of the guidance.
6. Cross reference is made with the VAWDASV commissioning guidance being produced and strategic links are built to ensure they work together.
7. Include a statement recognising that procurement through competitive tendering is not the only option in a commissioning process and references the Welsh Governments commitment to adhere to the EU directive on Procurement.



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8. Strengthen the references to the links with the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, including recognising all forms of violence against women, domestic abuse and sexual violence. The guidance should clearly reference the duties on local authorities and RCCs in line with VAWDASV (Wales) Act 2015 and outline that links should be made with regional VAWDASV strategic boards where they are being established.
9. Welsh Women's Aid would strongly recommend the amendment to section 4.7 to ensure it is reflective of the duties under the VAWDASV (Wales) Act 2015 and the National VAWDASV Strategy. Proposed text is outlined in our response to question 8.
10. Reconsideration is made on the reduction of outcome categories due to the possible loss of data for VAWDASV specialist support outcomes, in particular the 'managing relationships' category, which is key to the VAWDASV sector.
11. Welsh Women's Aid and our specialist VAWDASV member services believe it is inappropriate and unsafe to ask survivors to disclose their NI numbers for collection for the Supporting People records. We would recommend that in order to protect women and children accessing violence against women services a dummy NI system is used, created using the providers' database, which would also help the providers to tell the identity of their client.

**Supporting People Programme Guidance Questions**

**1. Is the draft Guidance appropriately person centred and is the eligibility criteria clear? Please give a reason for your response.**

<b>Yes</b>	
<b>No</b>	<b>X</b>

**Person centred approach:**  
 Throughout the guidance document, there are references to ensuring that clients of Supporting People services are at the core of the programme, which the guidance highlights is good practice. Welsh Women's Aid advocates for a person centred model of provision that is a strengths-based, needs-led, trauma informed approach for supporting survivors of violence and abuse (adults and children) to build resilience and foster independence and freedom from abuse. The central involvement of women who have experienced violence and abuse within and across



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delivery of services is vital to shape the development of service responses and review their impact. We coordinate and support Survivors Empowering and Educating Services (SEEdS), which enables women to lead on changing systems, improvements in communities and transformation in services.

While the guidance advocates for a person centred approach, it needs to also clearly ensure that commissioners and providers understand that this must be gendered and incorporate specialist support for BME communities, which is fully integrated throughout the commissioning process and delivery and ensure that the approach is fully resourced (see for example, research and standards evidencing the benefits of woman-centred services delivered by and for women's services<sup>2</sup>, and the benefits of having choice to access specialist BME services to support survivors, led by and for BME communities<sup>3</sup>). The guidance also needs to go further than only acknowledging that there are various barriers experienced by different service users to being 'involved in developing, commissioning, decommissioning and reviewing support services' but also provide guidance on the requirements and expectations on local authorities and regional collaborative committees (RCCs) to address these barriers and work with service providers and users to ensure that this is done appropriately. This is critical so that a wide range of views can be captured and inform provision, rather than those that are obtained most easily.

**Eligibility criteria:**

Welsh Women's Aid and our member services are concerned that eligibility criteria does not adequately reflect the provision of specialist VAWDASV housing related support in Wales.

1. The eligibility criteria should be clear whether 'any person in need of housing support' outlined covers **children and young people**. Regional consultation with our members has highlighted that there are inconsistent approaches across local authorities and RCCs as to whether the Supporting People Programme Grant (SPPG) can cover the support of children and young people in refuges and/or in the community. VAWDASV specialist provision is designed to meet the needs of adult survivors and their children, in order to deliver the best outcomes. This includes provision of vital housing related support including dedicated support within refuge and in the community for children and young people, that enables them to move towards having secure and stable homes, and improve their well-being and resilience to mitigate the multiple adverse experiences they have suffered. Some specialist services have

<sup>2</sup> <http://www.womencentredworking.com/wp-content/uploads/2014/08/WCW-defining-an-approach-document.pdf>

<sup>3</sup> [https://drive.google.com/file/d/0B\\_MKSoEcCvQwY1FRdl82T0laUjg/view](https://drive.google.com/file/d/0B_MKSoEcCvQwY1FRdl82T0laUjg/view)



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reported that, while they are funded to provide refuge and/or floating support to adult survivors, they receive little or no funding for supporting the children of adult survivors who also use these services in their own right. However this is not a consistent approach, with other specialist services reporting that the funding from Supporting People does cover the needs of both the adult survivors and their children in different local authorities. The Supporting People Programme Guidance needs to clarify this to ensure consistent support for children and young people who have been abused and need to access support to recover from the impact of domestic abuse and sexual violence. Access to support for their children is often one of the immediate and pressing needs of adult survivors, and only by ensuring equitable access to this support will we help adult survivors fully benefit from the support being offered to maximise their safety, mitigate the trauma they and their children have experienced, and help them recover from abuse.

2. The eligibility criteria needs to be clearer that **local connection criteria is not appropriate for refuge-based support services and other VAWDASV accommodation services**. Women who have experienced domestic abuse, particularly coercive control, are at risk of homicide, and the complex, segmented journeys they take to access safety and support (involving several attempts to seek helpful responses from public services) are made more fragmented by policy and practice, like enforcing 'local connection', and which places them in danger. Until more effective public sector responses to stop domestic abuse perpetrators have been achieved (which are a long way off in most areas) it is vital that those women and children who need to can swiftly move to access safety, support and rebuild their lives. The national network of refuge and move on provision in Wales is therefore a critical resource for the many survivors who need to travel beyond their local area to escape their abusive partner to ensure the safety of themselves and their children. Any funding decision made in regards to refuge services needs to acknowledge the potential impact on the network provision across Wales. While refuges receive the SPPG via regional and local mechanisms, it must be recognised within the needs assessment and commissioning process that they operate collectively within a national (and UK) network of provision. This should be made clear within the eligibility criteria, and where there is reference to local connection refuges should be exempt.
3. We strongly oppose the statement in the draft guidance under 2.5, that SPPG is a 'public fund' under immigration rules. While it is



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recognised that there are legislative restrictions that prevent people who have “no recourse to ‘public funds’ ” from accessing certain benefits, social housing and recourse to homelessness assistance, we do not believe this applies to SPPG. ‘Housing and homelessness assistance’ determined to be public funds’ under immigration rules are considered to be an allocation of local authority housing, allocation of a housing association property provided via the local authority rehousing list only, and statutory homelessness assistance.<sup>4</sup> This is further outlined in the Housing (Wales) Act 2014 which does not reference supporting people funds.

The statement in 2.5 of the draft guidance is a marked change from the previous guidance which does not impose this. To date, in Wales, women without recourse to ‘public funds’ have been able to access support resourced by SPPG when the refuge-based services has met their housing-related costs by means other than housing benefit. The guidance needs to reinforce this and recognise that all survivors and children experiencing domestic abuse need access to housing related support provided under SPPG , regardless of their immigration status and subsequent access to UK Government definitions of ‘public funds’. This is consistent with the Welsh Government VAWDASV Strategy which states: “Objective 6: *Provide victims with equal access to appropriately resourced, high quality, needs led, strength based, gender responsive services across Wales*” The guidance should also acknowledge that covering the costs of accommodating women with no recourse to “public funds” can be a financial burden on the services it funds, in particular on specialist BME provision. This can have an impact on the sustainability of SPPG funded provision. RCCs need to provide support to local authorities and providers so that links can be made with social services to ensure that there are alternative processes in place to cover the living/housing costs of accessing safety and protection for survivors and their children with no recourse to “public funds” accessing support under SPPG. This should be aligned to duties under the Social Services and Wellbeing (Wales) Act 2014. For instance, when commissioning SPPG funded services there should be collaboration with social services to agree the funding of women and children who have experienced domestic abuse with no recourse to public funds, via alternative funds.

**2 Does the draft Guidance have a positive impact on equality across service development and commissioning? If not, why not?**

<sup>4</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/518624/Public\\_funds\\_v13.0.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/518624/Public_funds_v13.0.pdf)



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Yes	
No	X

Welsh Women's Aid members have raised with us concerns that it is not clear where the Equality Impact assessment is in relation to this guidance.

In particular consultation with Welsh Women's Aid members raised concerns that there is no evidence of how the guidance addresses the support needs of Black and minority ethnic (BME) communities. In Wales 36% of those accessing refuge based support in 2015-16 identified as "not White British". The guidance needs to recognise the need for refuges led by and for BME women to be commissioned regionally, that are able to provide specific support for BME survivors and their children who experience multiple, intersecting inequalities; provide 'safe spaces' where BME women can express themselves; and also deliver a holistic approach that addresses systematic discrimination and marginalization.

It is not clear how the RCCs will take action to ensure the SPPG will be responsive to specific culturally sensitive provision and encourage an intersectional approach by commissioners. Doing so will mitigate against the potential for a detrimental impact on women and girl's lives and will better inform decisions about the kind of services that are funded and that women are able to access.

Welsh Women's Aid recommends that the guidance includes specific reference for the need for housing related support that is gender and culturally responsive, the importance of specialist, dedicated 'by and for' provision for women and BME communities, and that commissioning plans ensure issues such as sex, ethnicity, faith, sexuality, disability and age are addressed. Overall it was suggested by our members that more needs to be done to ensure that the guidance ensures commissioners address the needs of all people, but particularly for those groups who are most marginalised, excluded, and discriminated against. In doing so, this will also achieve the Welsh Government objective to prevent violence against women, which itself is a cause and consequence of inequality between women and men.

**3 Does the draft Guidance provide a clear commissioning framework for Supporting People commissioners and service providers? Please give a reason for your response.**

Yes	
No	X

The Supporting People Programme is the largest single source of funding for the specialist VAWDASV sector in Wales. The specialist sector



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provides life changing and life-saving support to survivors of violence against women including domestic abuse and sexual violence across Wales. It is therefore critical that the commissioning framework is effective in order to support this vital provision in a sustainable manner.

**Commissioning guidance:**

Welsh Women's Aid and VAWDASV specialist services across Wales have contributed to the production of commissioning toolkit , written and published by Lloyds Bank Foundation that has been supported by the Welsh Government. We would recommend that this is promoted to Supporting People leads and regional development coordinators to inform good quality commissioning and procurement of VAWDASV services, including refuge-based support. (The guidance can be found here: [http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/VAWDASV-Toolkit\\_Wales\\_web.pdf](http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/VAWDASV-Toolkit_Wales_web.pdf) )

Further to this the Welsh Government is producing statutory commissioning guidance for VAWDASV, this will need to be adhered to by public bodies including local authorities as part of their duties under the VAWDASV (Wales) Act 2015. This will have an impact on the Supporting People commissioning of VAWDASV provision and should be referenced within the SPPG commissioning framework. The commissioning framework needs to include specific instruction to RCC and local authorities to adhere to the VAWDASV commissioning toolkit and accompanying statutory guidance once it is published. The Supporting People and VAWDASV teams in Welsh Government need to consult as to how these two guidance documents will work together and provide instruction in both documents as to how RCCs and local authorities should adhere to both in conjunction.

**Collaboration across Supporting People and VAWDASV:**

The SPPG guidance suggests collaboration across strategic themes in regards to commissioning, however it fails to recognise VAWDASV as one of the strategic themes. Local authorities are currently developing their VAWDASV strategies and commissioning plans and it will be critical that SPPG commissioning plans are integrated within these. As above, RCCs and local authorities will have a role to ensure the implementation of both the Supporting People guidance and VAWDASV commissioning guidance is joined up. There should be a role for Public Services Boards to have oversight of this and provide some governance to ensure collaboration across remits.

Further to the above, links need to be made to the work being carried out by the Welsh Government to develop a model for sustainable funding for VAWDASV specialist services in the third sector, as set out in the National VAWDASV strategy 2016-2021. The Supporting People Programme, as



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the main resource for the domestic abuse sector will be critical to developing this and it is therefore vital that the development of guidance developed across Supporting People and VAWDASV areas reference each other.

**Procurement practices:**

Consultation with Welsh Women's Aid members has highlighted inconsistent procurement practices across local authorities. Welsh Women's Aid welcomes the reference to the Value Wales Procurement Route Planner and the legislative framework for procurement. We would suggest that procurement teams in local authorities need to be included in the distribution of this guidance and made aware of the full extent of services that it will cover.

**Identifying hidden need:**

Welsh Women's Aid members have raised some concerns that the commissioning guidance only refers to people or providers 'that have used Supporting People' services/funding. The limitation of this is that it does not seek to identify hidden or unsupported needs and therefore expand the reach of Supporting People, which should be ambitious in its aim to reach further than it previously has, in order to connect with potential clients whose needs are not currently being met.

**Tendering and Re-Tendering:**

Welsh Women's Aid recognises that the 'Tendering and Re-Tendering' section 4.9.9 was highlighted as needing to be reworded after discussions held by participants at the consultation event in Llandrindod Wells on 7<sup>th</sup> July. We would agree that it is currently unclear as to when strategic reviews on existing services should be carried out and re-tendering exercises will be carried out. Any decision to re-tender or remodel provision should be based on robust strategic review and needs assessment with the engagement of services users and potential services users. There should not be a practice of retendering for retendering sake but should be focused on addressing need and further developing support to meet that need. It must also take in to consideration how the current or new provision would fit in to the wider model of provision and referral pathways.

The guidance should recognise that procurement through competitive tendering is not the only option in a commissioning process. Reference to the EU directive on Procurement threshold for the new light touch regime of €750,000 meaning that contracts under this size do not need to go through a competitive tendering process and commissioners can be creative in their approaches including using grant funding if they wish.



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The guidance should strongly support the Welsh Government stance on procurement, that:

*“The new rules are aimed to help strategic commissioners strengthen quality of service provision. Contracting authorities may take important elements into account through award criteria (not just price) such as quality, continuity, accessibility, affordability, availability and comprehensiveness of the services; the specific needs of different categories of users, including disadvantaged and vulnerable groups; the involvement and empowerment of users; and innovation.’*

*‘This should help authorities secure services according to local needs and ensure sustainability of service which is critical, with potential contract performance conditions including economic, innovation-related, environmental, social or employment-related considerations (Reg. 70).’<sup>5</sup>*

**4 Is the draft Guidance flexible enough to encourage innovation and make the most effective use of the Supporting People budget? Please give a reason for your response.**

Yes	
No	X

Innovation should be informed by the person centred approach outlined above, ensuring that the innovation is based on improving provision and meeting of need in an effective new ways. The promotion of innovation however should not be prioritised over the funding of current provision of effective support that is clearly meeting the desired outcomes and needs. Welsh Women’s aid has the following comments on the guidance suggested new ways of working:

**Reduce the need for support plans for short term interventions:**  
 With regards to the plan to reduce the need for support plans for very short term interventions, it is important to assure that this change does not lead to a lack of assessment altogether and that opportunities for disclosure of VAWDASV, both within the specialist sector and within the wider housing sector, are not reduced. It is vital that even with very short term intervention needs are assessed and there is an opportunity for violence and abuse to be identified so that the appropriate offer of support, guidance and sign-posting to specialist VAWDASV services happens. This would be in line with the Welsh Governments Ask and Act framework for VAWDASV.

**Regional services and consortia:**

<sup>5</sup> <http://prp.gov.wales/docs/prp/toolkit/150226publiccontractsregulations2015.pdf>



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Welsh Women's Aid members have raised concerns regarding the guidance on developing regional services and consortia as possibly posing a threat to specialist expertise in smaller organisations. It must also be recognised that consortia building and managing can have significant impact on capacity of smaller organisations. Welsh Women's Aid has been running a capacity building project to support domestic abuse services and the development of consortia has been a key need identified within this project. If commissioners are going to encourage consortia within a commissioning process they need to ensure that it will protect smaller specialist services and that they allow for sufficient time and resources for all providers to be able to equally participate.

**5 Do you agree that the draft Guidance strengthens the governance arrangements of Regional Collaborative Committees (e.g. Regional Partnership Boards)? If not, please explain why?**

<b>Yes</b>	<b>X</b>
<b>No</b>	

Welsh Women's Aid members are in agreement with the arrangements and hope that RCCs will seek to represent all groups of people including those currently not funded by Supporting People.

We would recommend that in section 3.8.3 where it outlines that "formal links with Social Services and Well-being Regional Partnership Boards, as well as Public Service Boards, are in place and establish a robust governance structure and reporting arrangements to ensure the work of the RCC fits in with wider regional commissioning", that there is an additional reference that these platforms must also understand their duties in line with VAWDASV (Wales) Act 2015 and links should be made with regional VAWDASV strategic boards where they are being established.

**6 Is the connection between Supporting People commissioning and Welsh Government legislation clear? Please give a reason for your response.**

<b>Yes</b>	
<b>No</b>	<b>X</b>

While there are occasional references to Welsh Government legislation, it is more often a reference to listed legislation in section 1.6.1, rather than any extrapolation as to how the legislation links with the Supporting People Programme.



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Section 1.6.1 is the only part of the guidance that makes any reference to the VAWDASV (Wales) Act 2015. The Act needs to be reflected more clearly throughout the guidance. There are some references to domestic abuse, these terms should be updated in line with the VAWDASV Act and should refer to and take in to consideration the relevance of all forms of violence against women, domestic abuse and sexual violence. Refuge provision does not only provide for survivors who have experienced domestic abuse but in some areas also covers support for survivors of other forms of violence against women. For instance, there can be a need for a survivor of sexual violence to be provided with housing support where they no longer feel safe in their home. Some of our member services that provide specialist services for women experiencing sexual violence and other forms of violence against women have raised the need for SPPG to cover the costs of this support. This is in line with the public sector duties within the VAWDASV (Wales) Act 2015. In some areas this need for flexibility has been recognised by the funding local authority, the guidance needs to ensure that this recognition of their wider duties is consistent across local authorities in Wales.

**7 Is the role of stakeholders clear? If not, why not?**

<b>Yes</b>	X
<b>No</b>	

The guidance clearly outlines the roles of various stakeholders as well as clear commitment for RCCs to put in place consultation arrangements with a broad range of stakeholders listed. Welsh Women's Aid would recommend that this includes engagement with the new regional and local structures being developed regarding VAWDASV, including ensuring strong links with strategic VAWDASV boards.

We welcome the plan to publish links to RCCs webpages to enable stakeholders to access information and allow for transparency of the RCCs' plans and meetings. We would recommend that the guidance outline that RCCs should publish mechanisms for service user engagement on their webpages to ensure that these are widely publicised.

**8 Are there sections of the draft Guidance that could be strengthened or made easier to use? Please give a reason for your response.**

<b>Yes</b>	X
<b>No</b>	

As stated early we would recommend a strengthening of the links to the VAWDASV (Wales) Act 2015 and the National Strategy objectives. In



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particular Welsh Women's Aid would strongly recommend the following amendments to section 4.7 to ensure it is reflective of the duties under the VAWDASV (Wales) Act 2015 and the National VAWDASV Strategy. Particularly of concern is the reference to accommodation based and other support services for domestic abuse as costly options and the suggestion that target hardening can be used where possible to reduce demand on these. This is not only inaccurate but also potentially life threatening. Survivors who chose to go into refuges do so because it is the safest place for them and their children and offers a package of needs-led support including advocacy, advice, group work and child work that enables them to achieve long term outcomes, proving cost effective in the long run. Survivors do not enter refuge due to a lack of target hardening support and target hardening cannot be seen as a replacement for refuge provision. An independent Supporting People evaluation in 2009 found that refuge and floating support services for survivors of domestic abuse represent a saving to the state of £19,635 for each survivor who receives a dedicated domestic abuse support service via a refuge or floating support.<sup>6</sup>

Where target hardening has been used effectively it is seen as an additional tool for women to reduce the impact of post separation abuse and enable the women to feel safe and confident to report abuse. It can often be provided for women prior to or post accessing refuge support. It should always be provided alongside other support including advocacy. Provision of target hardening will not necessarily reduce the use, and therefore need for funding, of other forms of support. The cost saving that target hardening can produce is in the reduction of repeat victimisation and earlier intervention due to increased confidence to report domestic abuse.

Welsh Women's Aid recommended amendment to section 4.7.2:

**'Violence against Women, Domestic Abuse and Sexual Violence (VAWDASV)'**

- *Are SPPG funded services integrated with other VAWDASV provision and the VAWDASV strategy priorities? e.g. perpetrator programmes*
- *Are SPPG funded services working in partnership with local authority Housing Options teams to prevent homelessness and part of the wider model for early intervention and prevention of violence against women, domestic abuse and sexual violence.*

<sup>6</sup> Audit Commission (2009) *Supporting People Review: Report for the Communities and Local Government Department*, Audit Commission.



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- *Are local authorities and RCCs adopting integrated commissioning principles with wider partners in line with the Welsh Government's work on a model for sustainable funding and the VAWDASV statutory commissioning guidance<sup>7</sup>.*

**9 We would like to know your views on the effects that revision of the guidance could have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**Please also explain how you believe such revision 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.**

VAWDASV specialist services are already provided in many languages, including Welsh. Welsh Women's Aid suggest that the use of the Welsh language is maximized wherever possible. Survivor involvement work should be undertaken in Welsh and English wherever possible, and commissioning of services should ensure that service delivery is in Welsh where the need is evidenced for this.

Access to information in other languages must be available for women with English and Welsh as a second language, especially for newly arrived migrant women.

**10 Do you have any other comments on the draft guidance?**

<sup>7</sup> To be published Autumn 2017 – RCCs and LA should also consider the good practice guide produced by Lloyds Bank Foundation in collaboration Welsh Women's Aid endorsed by the Welsh Government

## SUPPORTING PEOPLE OUTCOMES CONSULTATION QUESTIONS

### What are we proposing to change?

1. Do you agree the proposed outcomes and client aspirations are the right ones (Table 1 Proposed Outcome Framework)?

Yes	
No	X

Please give a reason for your response.

The Supporting People outcomes need to link in with the National Strategy on Violence Against Women, Domestic Abuse and Sexual Violence 2016-21<sup>8</sup> and the VAWDASV National Outcomes and Indicators currently in development.

The outcomes framework is very ambitious in trying to fit the needs of all Supporting People users throughout in the 7 outcomes that are “most relevant” to the 60,000 individuals supported by Supporting People. Welsh Women’s Aid would urge that the approach is not “one size fits-all” as valuable data may be lost from the VAWDASV agenda. Further to this the 7 proposed outcomes do not reflect the specialisms within the VAWDASV sector and both BME violence against women, domestic abuse and sexual violence services in particular. As this data is likely to inform needs assessments and recommissioning of services it is vital that it is captured to ensure decision making is evidence based and recognises the impact and quality of specialist provision.

While we understand that the framework outcomes have been reduced to make them more focused on “the aims of the Programme, preventing homelessness and Government priorities”, it is the view of Welsh Women’s Aid and our member services that some of the removed outcomes are highly relevant to survivors accessing specialist violence against women services funded by the SPPG and will not necessarily be captured elsewhere within the framework. VAWDASV work itself is a government priority and the Supporting People Programme is a significant way in which the aims of the ambitious legislation may be achieved.

Collecting more robust data (rather than reducing data collection in Supporting People Funded projects) could be exceptionally valuable while the implementation of the VAWDASV (Wales) Act 2015 is in its infancy. We understand that the collection of the VAWDASV-related outcomes will

<sup>8</sup> Welsh Government, ‘National Strategy on Violence Against Women, Domestic Abuse and Sexual Violence 2016-21’, *Welsh Government*, 2016, <http://gov.wales/docs/dsjlg/publications/commsafety/161104-national-strategy-en.pdf>, [accessed 18/07/17].



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not be relevant across the whole of Supporting People but as paragraph 13 states that “People will only be expected to select outcomes which are relevant for them”, Welsh Women’s Aid asks that all relevant outcome areas as highlighted below are included, as these can be collected by the violence against women, domestic abuse and sexual violence sector and collected by other service users only when this is deemed appropriate.

The four outcomes that the consultation proposes to remove (**contributing to the safety and wellbeing of themselves and other; managing relationships; feeling part of the community; leading a healthy and active lifestyle**) are all relevant to the support that VAWDASV services provide. By removing them, it is not clear how VAWDASV specialist services will be able to capture the progress/success of the clients’ journeys to recovery from abuse to the same extent as under the current system. We believe that it is unclear whether the lost outcomes can be captured elsewhere in the 7 remaining outcomes proposed in this draft.

We appreciate that some aspects of ‘**leading a healthy and active lifestyle**’ may still be recorded under the new proposed ‘physically healthy’ and ‘mentally healthy’ sections, though the outcomes are likely to be diluted by the shifted lens. With regard to ‘**feeling part of the community**’, some aspects of this can be recorded under the education/learning and employment/voluntary work outcomes, though again, a lot of significant details are lost – many of which are ‘soft’ outcomes that are hugely significant to the progress and recovery from the devastating effects that survivors of VAWDASV routinely face.

We do not believe that it is enough to reduce the ‘**Contributing to the safety and well-being of themselves and of others**’ outcome to the ‘People feel Safe’ – ‘I feel safe’ category, as this does not go far enough to ensure that the correct outcomes are collected. The aspiration or perception of ‘I feel safe’ when a survivor is accessing a refuge is a huge over-simplification of the realities of people accessing life-saving crisis support. The time at which the question is asked will have a great bearing on the answer and the level of safety felt, but also lost from the outcomes are wider questions about others, such as the children who may or may not be in refuge with the individual. Rather, the existing outcomes offer a more nuanced view of the progress of survivors accessing this support. Again, ‘I have positive relationships with friends and family’ is overly simplistic in any violence against women, domestic abuse and sexual violence scenario as it is very likely that a singular or multiple perpetrator(s) would either be deemed as ‘friends’ or ‘family’.

Most concerning though is the absence of the ‘**managing relationships**’ category, which is key to the VAWDASV sector. For example, the old



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outcome measured increases in confidence and relationship improvements between survivors and their children. In the new outcomes, positive relationships are included under 'people feel safe', which Welsh Women's Aid does not believe fits as it does not cover parent-child relationships. Similarly, it is common that women accessing refuge may have incurred years of isolation as part of the abuse, therefore increases in confidence and relationship improvements are significant indicators of her progress through Supporting People funded services. While some elements could be recorded in the 'people feel safe' section, it cannot be said that feeling safe and having positive relationships amount to the same thing.

We also feel that there needs to be more guidance around the category 'people feel safe' as there is always confusion as to when this should be measured. It is also worth considering whether what is being measured should be an increase from a baseline, so that it is more person-focused and case by case.

**2. Do you agree with the proposed baseline information, e.g. I have a job, I am in learning/education, my accommodation is likely to be stable for at least 6 months (with support)? Is there other baseline information which should be collected (Paragraph 14)?**

<b>Yes</b>	
<b>No</b>	<b>X</b>

**Please give a reason for your response.**

Welsh Women's Aid agrees with capturing baseline information at start of client's access to services, though it should be noted that baseline information like "my accommodation is likely to be stable for at least 6 months" is not applicable to most survivors living in refuge accommodation as this is usually accessed at a point of crisis or need for accommodation on a short term or very short term basis.

We do not believe that the baseline information is universally meaningful across the board and would argue that it cannot be applicable across all client groups. For example, returning positive outcomes to the proposed questions has been highlighted by our members as very ambitious, for example, for BME survivors. It has been proposed by members that specific baselines for certain groups such as BME survivors would be more appropriate and meaningful.



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**3. To what extent do you agree that people accessing the services should self report their outcome success to providers which can be captured at review (Paragraph 12)?**

**Strongly Agree**

**Agree**

**Neither Agree nor disagree**

**Disagree**

**Strongly disagree**

**Please give a reason for your response.**

Welsh Women's Aid and our members agree that people accessing the services should self-report their outcome successes but this should be done in an appropriate way. For example, we support this if this was completed in person. However, if it is done remotely, for example, via phone or computer, more information would be needed.

We also believe that Outcome Stars should be used and have included an example of the Empowerment Star<sup>9</sup>, which is already used in some violence against women, domestic abuse and sexual violence services to record outcomes in face-to-face meetings with survivors.

**Unique References**

**4. Do you agree with the use of the National Insurance number as the unique identifier (Paragraph 6-8)?**

Yes	
No	X

**Please give a reason for your response including an alternative unique identifier suggestion if you disagree.**

The guidance calls for commissioners to "be wary of a 'one size fits all'" approach (pg. 10), and Welsh Women's Aid would urge the Welsh Government to apply this to proposed changes to unique references, by using National Insurance numbers only where it is both safe and appropriate to do so.

<sup>9</sup> See <http://www.outcomesstar.org.uk/using-the-star/see-the-stars/empowerment-star/>



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Supporting People funds life-changing provisions for 60,000 people in Wales – we ask that you consider the implications of proposing a ‘one size fits all’ solution when each of the 60,000 individuals accessing support have such varied lives and risk factors. The most dangerous time in a VAWDASV survivor’s journey is likely to be at the moment that she accesses Supporting People funded provisions – where the risk of homicide to both herself and her children at the hand of her perpetrator has never been greater.

While other organisations in the housing sector may have no objection to the use of NI numbers as unique references, it is the belief of Welsh Women’s Aid and that of our specialist VAWDASV member services that it is inappropriate and unsafe to ask survivors to disclose their NI numbers for collection for the Supporting People records.

Our concerns are as follows:

**1. Danger of being identified by perpetrators or friends/families who have access to the database**

- i. This could either be people acting on behalf of the perpetrator or friends/family members who may be concerned about the survivor but who endangers both the survivor and themselves by finding out e.g. that a survivor is in a specific refuge.
- ii. The dangers of NI numbers over addresses or phone number is that NI numbers are lifelong indicators and could give perpetrators the ability to track survivors around the country, if they move from refuge to refuge or into permanent residency.
- iii. Survivors whose abusers may have access to a database with their information are very likely to be aware of the potential dangers that access to the database could have, in terms of revealing their information and compromising their safety. This awareness may act as a barrier to survivors ever accessing lifesaving services such as refuges, not wanting to risk her safety and that of her children.

**2. Survivors may be unlikely to have NI numbers with them when they enter services, if not memorised, as they leave their homes at speed**

- i. Survivors often stay in refuge a very short time so the likelihood of NI numbers being able to be added at a later



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time. There would be a need to have a system in place to record these cases.

**3. Some survivors including BME women and young people are less likely to have NI numbers**

- i. Categorically, some people will not be able to give this information, so there will have to be an alternative for those who do not have NI numbers.
- ii. Young people accessing refuge around their 16<sup>th</sup> birthday may not have received their NI numbers by the time they enter refuge. While it could be argued that this could be added later, there must at least be a hold-gap procedure. If there is such a provision for this scenario, there is scope that NI numbers not to be used for every VAWDASV client.
- iii. It is also possible that some survivors might have to change NI numbers due to changing their identity as a result of the violence and abuses that have led them to receive Supporting People funded services. In this scenario, there would have to be a procedure in place as the old NI number would become void.

**4. DBS checks for those who use the database**

- i. While everyone with access to the database will have been DBS checked, it is well evidenced that most violence against women, domestic abuse and sexual violence perpetrators are never convicted and a huge number are never reported to the police, so DBS checks can only ever show a very small proportion of perpetrators. Even if convicted, the DBS check would have to take place after the conviction for it to be effective, which is not a strong enough process to protect survivors from the dangers of the perpetrator accessing their data.

Front-line staff from Welsh Women's Aid member services adamantly object to the use of NI numbers, in support of the survivors who are accessing Supporting People funds. One member has stated:

**“I am concerned that this information will be used for purposes other than services tracking. There is the potential that authorities may look to cap service costs in the future and to financially disadvantage our clients (as we have already seen in the rape clause proposal) through linking it with the benefits system. Our clients are already disadvantaged and discriminated against via the Criminal Justice system, the Benefits system to name but a few and this**



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seems like an unnecessary addition that provides greater risk and opportunity to exploit than benefit.”

**Recommendation:**

While Welsh Women’s Aid recognises there are benefits for Supporting People to adopt NI numbers as unique indicators for the wider housing sector, as it will bring a depth of data which as of yet has not been available about how clients are supported by the fund throughout their time accessing various Supporting People provisions. While we recognise the value of this data in general, we cannot see that this data around violence against women services is more important than keeping women and their children safe. There are issues with the current system of using first 3 letters of client’s surname, date of birth and M or F, as anyone with access to the database could find the record of someone by using details (such as D.O.B) that are often readily available even on social media sites such as Facebook. National Insurance numbers are also known to intimate partners, especially those who share a dwelling, therefore we would recommend that in order to protect women and children accessing violence against women **services a dummy NI system** is used, created using the providers’ database, which would also help the providers to tell the identity of their client.

This randomly generated information makes it impossible for someone with access to the database to identify a person they know on the system. For added security, we’d advise that there are no personal identifiers within this dummy NI, i.e. no date of birth references. Using randomly generated numbers is more secure than false NI numbers that follow a prescribed formula. While we acknowledge the possibility of double counting certain clients if they then go on to use non-VAWG specialist services, we believe this to be a possibility in only a small number of cases, and for the sake of safety it is much more preferable. This would require a caveat to acknowledge this possibility to protect the robustness of the data.

The vision of the guidance is that “everyone has a safe home where they can flourish”. Women’s refuges allow survivors and their children to begin their journeys towards achieving this. By making refuges potentially less safe, all women accessing these refuge provisions are put at greater risk.

As is stated in the consultation, “it is understood that people will need to be asked if their personal details, such as the National Insurance Number, can be used.” Welsh Women’s Aid and our members are concerned that while this suggests there is a choice as to whether a survivor does give there details, there is no indication as to whether Supporting People providers are still able to provide the service if women elect to not give this information.



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Also concerning is the following point from the consultation document:

*“It is now a mandatory part of the local authority contracts that they will ensure appropriate disclaimers are used by providers to ensure people are aware their information may be used, usually anonymously, for data research and analysis purposes as well as helping to shape and improve services.” (pg. 57).*

It cannot be stated strongly enough that it is highly inappropriate for non-anonymised data from VAWDASV services to be used.

## Equalities

**5. To what extent do you agree that there needs to be an increased use of equalities information to ensure equality of opportunity and to help shape its future direction (Paragraph 16 – 18)?**

**Strongly Agree**

**Agree**

**Neither Agree nor disagree**

**Disagree**

**Strongly disagree**

**Please give a reason for your response.**

Equalities information for monitoring purposes is vital but for safety and data protection reasons, it needs to be anonymised and not related or stored with client details. This information will help inform the people collecting the data on which groups of people are both accessing and not accessing support, in order that trends can be identified. This information will be really valuable and help to shape future support that includes people from all groups, and particularly groups that have previously been under represented in client groups.

## Collection of three levels of data

**6. To what extent do you agree it is still appropriate to collect lead, secondary and tertiary needs (Paragraph 19)?**

**Strongly Agree**

**Agree**

**Neither Agree nor disagree**

**Disagree**



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**Strongly disagree**

**Please give a reason for your response.**

In order to address the needs of survivors who face multiple disadvantage and discrimination (labelled as clients with “complex” intersectional needs), Welsh Women’s Aid strongly agrees that it is appropriate to collect details of lead, secondary and tertiary needs as this gives a much more rounded understanding of the individual experiences of clients and how various services can and must interlink in order to appropriately respond to the specific needs of each individual service user. It will also evidence that a siloed approach to trying to remedy a lead need in isolation of a secondary or tertiary need is unhelpful and does the client a disservice. Equally important is should be the requirement to identify unmet needs for all clients.

Labelling a client’s need as ‘domestic violence’ must reflect the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, and therefore be updated to the category of ‘violence against women, domestic abuse and/or sexual violence’. This should be clearly understood in the ‘needs’ assessment as referring to any form of sexual violence, domestic violence, stalking and harassment, FGM (female genital mutilation), forced marriage, so-called ‘honour-based violence’, trafficking, sexual exploitation including through the sex industry, and abuse of women and girls in online spaces.

**Long and Short term services**

**7. To what extent do you agree it is appropriate to start collecting evidence of people who are provided with very short term services of less than a month (Paragraph 21)?**

**Strongly Agree**

- Agree**
- Neither Agree nor disagree**
- Disagree**
- Strongly disagree**

As stated previously, some women accessing refuge often only stay overnight, for a few days or for a week , it is there for important for short term services to capture data from the point of access to measure need and reflect short term impact. Whilst outcomes and impact data needs to be reported, this must be proportionate and relevant to both the provisions and the client group.



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**7a** If so do you agree the question proposed is correct? *how many people were seen 'on demand', for a period of less than 1 month, and where there were no outcomes recorded?*

Yes	X
No	

Please give a reason for your response.

**8.** Are the outcome measures proposed appropriate for people in long term supported accommodation (Paragraph 22)?

Yes	
No	

Please give a reason for your response. If you feel these outcome measures are not appropriate, can you outline why and what could be an alternative proposal?

n/a

**9.** What is a suitable outcome for long term services, could it be "*the support I receive helps me to remain in my own home*" – the number and/or % of people in supported accommodation who receive support to help them remain in their own home?

Yes	
No	

Please give a reason for your response.

n/a

**10.** Do you have any other comments on outcomes for long term services?

n/a

**Fixed/floating support**



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**11. Should the terms fixed and floating support be changed to reactive and preventative respectively (Paragraph 23 – 24)?**

Yes	
No	X

**Please give a reason for your response.**

Welsh Women’s Aid member services consider the current terms to be self-explanatory. The terms “fixed” and “floating support” are understood within the VAWDASV sector so would offer continuity. If the terms were to be changed there would need to be further explanation of what the terms were referring to. Preventative support can be used to encompass a wider range of support within VAWDASV sector including ‘fixed’ refuge provision as it prevents further abuse and the support provided can prevent a number of negative outcomes.

The Welsh Government has an emphasis on prevention across legislative agendas including VAWDASV. Preventative approaches should be built in to both fixed and floating support. This is particularly resonant in the focus on addressing adverse childhood experiences of which domestic abuse is a key factor. If we are to successfully mitigate the impacts of adverse childhood experiences multiple preventative approaches need to be integrated across fixed and floating support and not separated out.

**Data Collection Tool**

**12. Do you feel it would be of benefit to have an all Wales database (Paragraph 25 - 27)?**

Yes	X
No	

**Please give a reason for your response.**

As the VAWDASV umbrella organisation in Wales, Welsh Women’s Aid is currently in the process of developing our all Wales database with our member services to collect national VAWDASV services data and national indicators. We are currently in dialogue with Welsh Government about this process to update our national data collection system to reflect the new national VAWDASV outcomes framework.



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Any national SPPG database would need to align with any parallel systems for collecting VAWDASV outcomes and indicators across all third sector specialist services, and with VAWDASV commissioning frameworks, which would be contributed to by multiple providers outside of SP commissioning. To avoid duplication, further conversation would be required to ensure both systems compliment and add value to the other.

As Welsh Women's Aid will continue to collect national data for VAWDASV as it does presently and is seeking funding to automate the process if possible. We would not be interested in funding the annual cost of the general Supporting People database. We will be developing the methodology with specialist VAWDASV services in Wales in accordance with the National VAWDASV Outcomes Framework. We would very much hope that the Supporting People Team would be a key stakeholder in this work.

We would recommend that any national data collection tool would have to comprise of anonymised data, due to the sensitivity of holding personal and identifying data for survivors of VAWDASV, and the risk to life this will pose if perpetrators were able to access or reconfigure this into identifying data.

**12a. If yes, is your organisation prepared to make necessary IT changes to enable that to happen? Is your organisation prepared to fund the annual cost of running that database?**

Yes	
No	X

**13. We would like to know your views on the effects that revision of the outcomes framework could have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**Please also explain how you believe such revision 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.**

VAWDASV specialist services are already provided in many languages, including Welsh. Welsh Women's Aid suggest that the use of the Welsh language is maximized wherever possible. Survivor involvement work



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Cymorth i Ferched Cymru  
Welsh Women's Aid

Rhoi Merched a Phlant yn Gyntaf  
Putting Women & Children First

should be undertaken in Welsh and English wherever possible, and commissioning of services should ensure that service delivery is in Welsh where the need is evidenced for this.

Access to information in other languages must be available for women with English and Welsh as a second language, especially for newly arrived migrant women.

**14. Is there anything else about this consultation you would like to comment on?**

n/a

**Consultation Response Form**

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