



Live Fear Free Helpline

Providing confidential support and information on domestic abuse, sexual violence and violence against women in Wales

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**Inquiry into the Supporting People Programme
Consultation Response by Welsh Women's Aid
Closing date: 22.12.17**

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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 membership organisation in Wales that supports and provides national representation for 27 independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (our membership of specialist services).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 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. 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 umbrella 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

¹ Our membership of 27 third sector VAWDASV specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated: *Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Bawso, Clwyd Alyn Housing Association (CAHA) Women's Aid, Stepping Stones, New Pathways, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU), Glyndwr Women's Aid, Gorwel (Grwp Cynefin), Hafan Cymru, Llamau, 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 (formerly Llanelli Women's Aid), West Wales Domestic Abuse Service and Rape; and Sexual Assault Centre North Wales.*





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preventative Safety, Trust and Respect (STAR) programmes across Wales, and refuge and advocacy services in Colwyn Bay and Wrexham. We are piloting the Survivors Empowering and Educating Services (SEEdS) project, which is empowering survivors of violence and abuse to collectively influence and inform 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 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's response

As the umbrella organisation for violence against women, domestic abuse and sexual violence in Wales our response is based on consultation with our membership of specialist services and reflects their experiences across all regions. Additionally, we consult with survivors through Welsh Women's Aid's SEEdS project (Survivors Empowering and Educating Services), whose first-hand knowledge of using temporary accommodation informs this response.

Question 1: The impact of wider policy developments on the programme

Domestic violence costs Wales £303.5m annually: £202.6m in service costs and £100.9m to lost economic output. These figures do not include any element of human and emotional cost, which the research estimates costs Wales an additional £522.9m.² Each domestic abuse homicide is estimated to cost public services in the region of £1.1million.^{3 4}

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. If efficiencies of this order are achievable on a small proportion of total spend, they could be even greater if applied to mainstream budgets for policing, children, health and justice.⁵

A more recent study of refuge provision made a conservative estimate of the value generated by one year of delivering refuge services providing a combination of refuges, outreach and advocacy services: the social value was in the region of £33m to the state. The overall social return on investment identified that a refuge service model is economically efficient at creating positive outcomes, and that

² Walby, S., 'The Cost of Domestic Violence: Update 2009', Lancaster University, 2009, http://www.lancaster.ac.uk/fass/doc_library/sociology/Cost_of_domestic_violence_update.doc, (accessed 6 Dec 2017).

³ Brand, S. and Price, R. 'The Economic and Social Costs of Crime', *Home Office Research Study 217*, 2000.

Brennan, D. 'The Femicide Census: 2016 findings – Annual Report on Cases of Femicide in 2016', *Women's Aid England*, 2017.

⁴ New data from the 'Femicide Census 2016' indicates that there were 13 murders of women by men in Wales in 2016, with South Wales reporting the second highest number in England, Wales and N. Ireland (8 women killed), and the fourth highest per capita (at 0.62 per 100,000). With each domestic abuse homicide estimated to cost public services around £1.1m, this amounts to an estimated £14.3m in Wales in 2016.

Brennan, D. 'The Femicide Census: 2016 findings – Annual Report on Cases of Femicide in 2016', *Women's Aid England*, 2017.

⁵ Audit Commission, 'Supporting People Review: Report for the Communities and Local Government Department', Audit Commission, 2009.





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for every £1 spent, an average of £3.54 social value was created through a combination of safety, health and criminal justice outcomes.⁶

Supporting People has the potential to continue creating a real difference to vulnerable people across Wales, including survivors of violence against women, domestic abuse and sexual violence (VAWDASV). Any reduction to funding levels received by specialist VAWDASV services can have a massive impact and there are great fears around the potential impact of the proposed Welsh Government budget plan to remove the ring-fence of both the VAWDASV Services grant and the Supporting People Programme grant if they are absorbed into the proposed Early Intervention, Prevention and Support Grant.

Welsh Women's Aid members are concerned that removal of the Supporting People ring-fence, without transitional arrangements that maximise the protection of those services most likely to be lost (like VAWDASV specialist services), will very likely result in the dismantling of our national network of third sector specialist services that provide life-saving and life-changing support to victims of domestic abuse, sexual violence, 'honour-based' violence, FGM, sexual exploitation and harassment.

The impact of these Welsh Government proposals will be compounded by UK Government plans to change the way supported housing is funded, effectively handing over the equivalent of rental costs for refuges to governments or local areas to distribute. There is no specific protection in this funding model for refuges. Yet this will be accompanied by a UK Domestic Abuse Bill in the New Year which will increase demand for support and place further pressure on specialist services.

Welsh Women's Aid recommends that Supporting People be removed from the Full Flexibility Pathfinder pilot projects, therefore re-instating the ring-fence and protecting Supporting People funding.

1.1 The overall clarity of the Programme's objectives:

Welsh Women's Aid welcomes the addition of homelessness and poverty prevention in the Supporting People objectives, which the recent audit⁷ noted had previously been absent. While 7% of all Supporting People funding is allocated to women experiencing domestic abuse⁸, it is surprising that domestic abuse is not explicitly referenced in the Supporting People objectives. Survivors of domestic abuse depend on this funding to provide life-saving and life changing provision through specialist VAWDASV services. It is therefore our concern that without explicit reference to domestic abuse/VAWDASV in the Supporting People Grant aims, this funding could potentially be allocated away from VAWDASV survivors and specialist services who support them.

Our members' felt some reassurance in relation to the objectives on housing and keeping people housed; they expressed that they felt that these objectives within the Supporting People Programme are clear. However, in circumstances that affect people's ability to retain tenancies because of the circumstances they find themselves in (that could change their housing situation), such as domestic abuse, the objectives are less clear.

⁶ New Economics Foundation (2013) 'Social valuation of Refuge services for survivors of domestic violence', NEF Consulting

⁷ Auditor General for Wales, 'The Welsh Government's Supporting People Programme', *Wales Audit Office*, 2016.

⁸ Ibid, p.7.





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Further to this, there are also concerns amongst our membership about how some people who are in need but do not neatly fit into the identified criteria do not always qualify for the support they so desperately need. One service stated:

“the objectives of the programme need to be clearer in terms of increasing independence for vulnerable people, providing shelter and basic human rights.”

Welsh Women’s Aid recommends the Supporting People Programme objectives:

- Specifically recognise VAWDASV to reflect the integral role that the programme has in providing support for survivors of VAWDASV.
- Are broad enough to reflect the diversity of vulnerable people’s circumstances to enable support to be provided that is needs-led and person centred.

1.2 Implications of, and emerging response to, the UK Government’s Supported Accommodation review:

Welsh Women’s Aid members have highlighted that the change in funding from the current housing benefit model presents a real risk to refugees in Wales, as housing benefit makes up a large proportion of refuge income. All refuge provision across Wales may be at risk, but the issue is particularly acute for smaller organisations.

Welsh Women’s Aid responded to the UK Government consultation⁹ in the spring and were involved in the short term accommodation working group that put forward proposals to the UK Government on funding mechanisms. We are also working with the Welsh Government in developing a devolved model for funding supported housing. We are also in the process of consulting with our members and engaging with survivors in responding to the Department for Communities and Local Government and Department for Work and Pensions published a White Paper¹⁰ on Funding Supported Housing

Welsh Women’s Aid has welcomed the changes introduced to extend the period for the Welsh Government to develop a Wales model for this funding stream, to April 2020, and the recognition of the need for a different model for short-term accommodation. However, there are still grave concerns, particularly around the proposed level of funding in 2020-21 devolved to the Welsh Government, which is set to be equivalent to what would otherwise have been available through the welfare system. As a consequence, the funding levels will be set at current projections for future need and so, may not be flexible to actual demand. The UK Government has stated that a new funding model will ensure that supported housing continues to be funded at the same level it would have been in 2019/20, but this does not allow for increases in rent charged by landlords that are passed onto service providers, or for inflationary increases in service charges, for example in energy costs. It is

⁹ Copy of our response can be found here: <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/WWA-Response-Funding-for-Supported-Housing.pdf>

¹⁰https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/656027/Funding_supported_housing_-_policy_statement_and_consultation.pdf



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likely that any increase in costs or reduction in the pot will lead to a reduction in support elements at a time when we are seeing increased support needs of women and children accessing refuge.

There is also a risk that as Welsh Government devolves all Supporting People and VAWDASV Grant funds to local authorities and loses the ring-fences on both grants, the allocation of the funding for supported housing from the previous housing benefit pot in Wales will also go into a local non-ring-fenced pot. If this is the case, refuges in Wales would be at risk of losing all their funding, not just the support element. In addition, refuges are run as part of a UK-wide national network of services and continued disinvestment of the specialist VAWDASV services on either side of the boarder endangers survivors and their children, regardless of the region in which they live.

One member specialist service has summarised their response to the UK Government’s Supported Accommodation Review:

“We believe that the distribution mechanism for the proposed devolved supported accommodation funding must be clearly linked to Supporting People commissioning. Therefore, it is essential that Supporting People funding remains distinct and is not merged with non-housing grants. The three definitions of supported accommodation need to be clearly understood; there is a mechanism in Wales to ensure that sheltered rents are regulated; that supported housing in Wales is accurately 'supply mapped' to include growth and schemes in the pipeline; that short term funding financial model/administration is based upon commissioning arrangements undertaken in alignment with SPPG revenue funding.”

This framework would need enable cross-boundary working. Local/regional connection criteria is not appropriate for VAWDASV accommodation services as it may be for other Supporting People services. The national network of refuge and move on provision in Wales is a critical resource for the many survivors that need to travel beyond their local area to escape their abusive partner to ensure the safety of themselves and their children. Any funding model needs to acknowledge the potential impact on the network provision across Wales. While there is a possibility for the model to be a regional and local mechanisms, it must guarantee that it supports services to operate collectively within a national network, both in Wales and across the UK.

Welsh Women’s Aid recommends the new model being developed by Welsh Government must:

- Deliver the Welsh Government commitment to work collaboratively to build provision of VAWDASV specialist services by providing sustainable funding for VAWDASV specialist services, as set out in the VAWDASV National Strategy 2016-21. Revenue and capital funding systems must work together to provide a long term and sustainable funding solution for specialist services and their services users.
- Require adherence to the VAWDASV commissioning toolkit for Wales¹¹ and the accompanying forthcoming statutory commissioning guidance for VAWDASV specialist services, being produced as part of the Welsh Government commitments within the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.
- Consider the impact of Universal Credit on women and children accessing move-on accommodation, and ensure sustainable funding for refuges must include delivery of

¹¹ https://www.lloydsbankfoundation.org.uk/VAWDASV%20Toolkit_Wales_web.pdf



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resettlement support, which helps survivors move on to rebuild their lives and establish themselves in local communities.

- Ensure it supports the minimum provision of services at national level to ensure Wales adhere to the Istanbul Convention requirements¹², and that for domestic abuse services they adhere to the Wales National Quality Service Standards (endorsed by the National Advisor and delivered by Welsh Women's Aid, with support from Welsh Government).
- Guarantee that it supports services to operate collaboratively to deliver a national refuge network for survivors, as part of a Welsh and UK network of provision.
- Supports refuge provision as defined by *Routes to Support* (previously UK Refuges Online), "a refuge offers accommodation and support which is tied to that accommodation. The address will not be publicly available. It will have a set number of places. Residents will receive a planned programme of therapeutic and practical support from staff and access peer support from other residents. This will include: access to information and advocacy; emotional support; access to specialist support workers (e.g. drugs/alcohol misuse, mental health, sexual abuse); access to recovery work; access to support for children (where needed); practical help; key work & support planning (work around support needs including e.g. parenting, finances and wellbeing); safety planning; and counselling." (Routes to Support, 2017)

1.3 How the Welsh Government might improve communication about priorities of the Programme and the impact of wider developments:

Welsh Women's Aid members have called for relevant national updates, with regional information to be distributed whenever applicable. As the national VAWDASV umbrella organisation in Wales, Welsh Women's Aid can support disseminating information to the appropriate organisations within our network. This approach could also be applied to other membership organisations of Supporting People funded organisations such as Cymorth Cymru and Community Housing Cymru. In addition, Supporting People teams within local authorities could also provide updates. By adopting a number of approaches, it is likely that information will reach relevant recipients and not be lost when specific contacts change job roles.

One service voiced concerns about their organisation only receiving updates when they were being asked to do more, such as to communicate an increase in the levels of mandatory monitoring. There was a desire for updates from Welsh Government to "us as providers" and more of a conversation with Supporting People teams that supported service staff in their implementation of the programme.

Welsh Women's Aid recommends

- Consistent, relevant and timely national updates to service providers from Welsh Government and Supporting People teams, supported by umbrella organisations such as Welsh Women's Aid.

¹² See <https://rm.coe.int/168046031c> and <https://icchange.co.uk/about/resources/>



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1.4 How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements:

Welsh Women’s Aid recommends aligning Regional Collaborative Committees (RCCs) work with VAWDASV strategic boards, as part of a joined up approach to tackling VAWDASV across Wales. Further to this, one recommendation from our membership was that the RCCs should be using existing fora and building on collaborations rather than setting up new boards. Our members highlighted there was a need to:

“understand how Supporting People integrates with other agendas and positively impacts on other services.”

One service raised concerns that they are not able to effectively engage with the Supporting People provider forums. It is critical that VAWDASV services have representation on these forums. There is a need to ensure that all services funded by the Supporting People Programme are engaged with service provider forums and have access information from the RCCs to allow for transparency of the RCCs’ planning and decision making.

Welsh Women’s Aid recommends that the Supporting People Programme:

- Ensure links between RCCs and VAWDASV strategic boards, including representation from either on both partnerships.
- Ensure VAWDASV specialist services are supported to effectively engage with provider forums across all regions.

1.5 The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years:

Welsh Women’s Aid members have called for promising practice to be:

“shared and opportunities for increasing focus on partnership working with other key strategic groups be a key factor so that there is clarity on how key programmes impact on services and how agendas can be integrated.”

Our members have reported that there is a lack of consistency across regions in the criteria and relationship with Supporting People team. For instance, some VAWDASV specialist services have 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 across RCC regions, 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.

Members have also raised differing approaches to commissioning, informed by varied levels of understanding VAWDASV and specialist service provision. There is wide consensus on the need for increase understanding within Supporting People teams of the importance and distinct nature of VAWDASV specialist services, of the nature and complexity of provision and of the expertise held by professionals working within VAWDASV specialist services. There are concerns regarding the trend towards favouring contracting with generic services which are not equipped to deliver specialist



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support for VAWDASV survivors, yet they are required to provide services for survivors of abuse. The understanding of the need for VAWDASV specialist services differs across regions and leads to a postcode lottery of provision across the national network. One specialist VAWDASV service voiced concerns:

“We are feeling that Supporting People are pushing us as a domestic abuse organisation to be generic. We are not convinced that the Supporting People Commissioners are able to deal with domestic abuse in Supporting People which is a shame and this will cause problems for dealing with domestic abuse and access to housing for victims.”

Welsh Women’s Aid recommends

- the Supporting People programme criteria clarify that the fund can be used to support children and young people as well as their mothers who are impacted by domestic abuse and need housing related support, to ensure consistent support for children and young people who have been abused and to mitigate the trauma associated with such adverse experiences.
- Ensuring Supporting People teams better understand the importance and distinct nature of VAWDASV specialist services, of the nature and complexity of provision and of the expertise held by professionals working within VAWDASV specialist services ie that services deliver support within National Quality Service Standards framework and professional competencies align with National Occupational Standards for domestic and sexual abuse.

1.6 The extent to which the governance and management arrangements for the Supporting People Programme reflect the way of working expected in the Wellbeing of Future Generations (Wales) Act 2015:

A member of Welsh Women’s Aid SEEdS (Survivors Empowering and Educating Services) stated:

“I feel that measuring the Supporting People programme against the Wellbeing of Future Generations (Wales) Act 2015 principles is a very important task. However, other legislation is also part of the under-pinning too, such as the Housing (Wales) Act 2014 and the Social Care and Wellbeing Act (Wales) 2014.”

At present, it is difficult to see how the Wellbeing of Future Generations (Wales) Act 2015 5 *was of working* (Long Term, Prevention, Integration, Collaboration and Involvement) is reflected in the governance and management of the Supporting People programme, when viewed from a provider’s perspective.

The way refuge-based support services are resourced via the programme in many areas of Wales (ie short term, funding time limited contacts with clients, not resourcing the support needs of children) does not reflect survivors’ needs for *long term*, holistic support to meet their needs. Our most recent ‘state of the sector’ report also found that 500 survivors of abuse were unable to access refuge-based support last year because the support services did not have the resources and capacity to meet their needs. The programme’s management should urgently review why 500 survivor of abuse are turned away from some of its core provision, when more strategic and joined-up investment could ensure services have capacity to meet the needs of survivors experiencing multiple disadvantage.



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Prevention of violence against women, domestic abuse and sexual violence (as the root cause of much of women’s housing-related support needs) is also not invested in by the Programme, given this would necessitate resourcing services to address gender and other intersectional inequalities between women and men. Some collaboration occurs with specialist services through RCCs and nationally, but greater strategic join-up is needed between VAWDASV strategic boards and RCCs, between the SPNAB and VAWDASV National Advisory Board and between the development of training, national outcomes and indicator measures, and national commissioning guidance development. Any work on promoting involvement by those responsible for governance and management of the programme must also ensure survivors of domestic abuse, sexual violence, honour-based violence, exploitation and harassment, be central to involvement strategies. This requires investment to ensure survivors are supported and empowered through this process.

With regards integration, the Wellbeing of Future Generations (Wales) Act 2015 seven wellbeing goals are all relevant to the prevention of VAWDASV and supporting survivors. The Wellbeing of Future Generations (Wales) Act is also underpinned by a commitment to delivering the international Sustainable Development Goals, one of which (SDG5) commits Wales to: “Achieve gender equality and empower all women and girls.” The 9 targets to be achieved, within this, include the following, which we would expect the Supporting People programme to support delivery of:

- Ending all forms of discrimination against all women and girls
- Eliminating all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation
- Eliminating all harmful practices, such as child, early and forced marriage and female genital mutilation, and
- Adopting and strengthen sound policies and enforceable legislation for the promotion of gender equality and the empowerment of all women and girls at all levels

Further, the revised 12 Well-being Goals published in the most recent National Well-Bering Statement that supports deliver of the Welsh Government Prosperity for All Strategy includes commitments to: (2) Tackle regional inequality and promote fair work; (5) Promote good health and well-being for everyone; (6) Build healthier communities and better environments; (7) Support young people to make the most of their potential, and (10) Build resilient communities, culture, and language. The Prosperity for All Strategy also encourages cross-cutting action to improve early years, housing, social care, mental health, skills and employability.

VAWDASV specialist services’ primary function is to meet survivors’ support needs whilst also delivery prevention work in local communities. This includes targeted support by and for BME women and communities, which is vital to address the needs of survivors of abuse and to deliver preventative work in BME communities. As such, they work towards delivering SDG5, and they address the root causes of problems associated with the most significant adversities in childhood, of homelessness, of one of the main reasons behind social care provision, of mental ill-health, and of women’s and young people’s skills and employability support needs; namely, domestic abuse, child sexual abuse, rape and sexual violence, sexual exploitation, risk of forced marriage or honour based violence, sexual harassment, modern day slavery and prostitution.

VAWDASV is a cause and consequence of inequality between women and men and has significant cross-cutting impacts on the health and wellbeing of women and children. The well-being goals in Wales cannot therefore be achieved without taking urgent steps towards preventing and mitigating



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the impacts of the epidemic levels of violence against women, domestic abuse and sexual violence in every community in Wales. Welsh Women’s Aid supported the Future Generations commissioner in her review of Public Service Board well-being plans and were extremely concerned that VAWDASV hardly featured in local population assessments. We would be concerned if Supporting People teams were to rely on these local population assessments which do not adequately reflect an assessment of the needs of VAWDASV survivors. Some members have made the point that the lack of sustainable funding in the VAWDASV sector works against the fulfilment of the Wellbeing of Future Generations Act’s objectives:

“Sustainability is needed to ensure we see the impacts achieved. The current budget planning process does not allow for long term planning to enable assessments and impacts to be done and social value understood.”

As the largest contributor to VAWDASV specialist services¹³, the Supporting People programme has a significant role to play in making this a reality.

Welsh Women’s Aid recommends that SP governance and management arrangements must:

- Audit how implementation of the programme and its delivery of the required 5 ways of working addresses the requirements to prevent violence against women, domestic abuse and sexual violence as required by VAWDASV Welsh legislation.
- Take action to improve investment into long term support for survivors including those experiencing multiple disadvantage, into prevention of VAWDASV, into a more collaborative approach with VAWDASV providers, and invest in support that enables involvement of survivors of abuse in the programme delivery and commissioning arrangements.
- Ensure the Supporting People programme strategically and operationally delivers Sustainable Development Goal 5, which underpins the Wellbeing of Future Generations (Wales) Act 2015
- Ensure the Supporting People programme recognises that to address the 5 cross-cutting priorities in the Government Strategy, it must prioritise VAWDASV specialist services as being core to its delivery programme. This must be accompanied by working strategically with other commissioners to ensure joint strategic investment to deliver sustainable funding for VAWDASV specialist services.

Question 2: Monitoring and evaluation

2.1 How monitoring/outcome data is used to inform decision-making about programme expenditure and contract monitoring:

Some members have told us that they feel that monitoring and outcomes data is only considered when undertaking service reviews and information is reported to the RCC across localities. Others have raised concerns that duplication of information requested is time consuming and often feels unnecessary, for example, one member said:

“We fill in more forms and spend more time doing it than our commissioner spends understanding the effectiveness...”

¹³ Welsh Women’s Aid, ‘Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales’, 2017.



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Services also state that the same information needs to be inputted into several different systems, reducing staff capacity that could be put to better use helping survivors accessing services:

“... why is some of this not fed through from [one system] so we do not have to keep data entering the same information.”

Survivors have also highlighted concerns around the specific data requested within the Supporting People programme:

“My response is more to do with 'what' data is being collected in the first place and how much of it draws on lived experience and those working at the grass roots level.”

The proposal to collect national insurance (NI) numbers as new unique identifiers was raised as a serious safety concern when we consulted with members and survivors over the Welsh Government’s Supporting People guidance and framework consultation in August 2017. Our concerns are as follows:

- Danger of being identified by perpetrators or friends/families who have access to the database;
- Survivors may be unlikely to have NI numbers with them when they enter services, if not memorised, as they leave their homes at speed;
- Some survivors including BME women and young people are less likely to have NI numbers;
- 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.

Most front-line staff from Welsh Women’s Aid member services adamantly object to the use of NI numbers for survivors who are accessing Supporting People funded services. For example:

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

Welsh Women’s Aid recommends:

- To inform needs assessments and recommissioning of services, monitoring and outcomes data should effectively capture VAWDASV specialist service data to ensure decision making is evidence-based and recognises the impact of specialist provision. This must be done in a way that is both focused on survivor needs and within the capacity of the VAWDASV specialist services.
- The national Supporting People database should be aligned 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 Supporting People commissioning. To avoid duplication, further conversation is needed to ensure both systems compliment and add value to the other.



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2.2 The proposed revised outcomes framework and the extent to which it will address the limitations of the current framework:

Welsh Women’s Aid members noted that the revised outcomes framework is very ambitious in trying to fit the needs of all Supporting People service users throughout the 7 outcomes that are “most relevant” to the 60,000 individuals supported. We would urge that the approach is not “one size fits-all” as valuable data may be lost from VAWDASV services, as the seven proposed outcomes do not reflect the needs/specialisms within the VAWDASV sector, BME VAWDASV services in particular. Survivors ‘feeling safe’, for example, might be more to do with having had the perpetrator removed by the CJS and may not mean that their support needs have been met. 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.

Welsh Women’s Aid recommends:

- The Supporting People outcomes need to link in with the VAWDASV National Strategy 2016-21¹⁴ and the VAWDASV National Outcomes and Indicators currently in development.
- There needs to be more guidance around “people feel safe” as there is confusion as to when this should be measured. What is being measured should also be evidence of positive change created in a way that is person-centred, on a case by case basis.
- Monitoring data for refuge-based support services and other VAWDASV services funded by Supporting People must reflect the needs of survivors using those services and the nature of the services being delivered.

2.3 How any revised outcomes framework arrangements can be best communicated and embedded:

As the national umbrella organisation of the VAWDASV specialist sector in Wales, Welsh Women’s Aid can support information dissemination to these organisations. Members have requested email updates and regular correspondence regarding revisions and changes to the framework from Welsh Government, as it is so essential that the VAWDASV specialist sector knows about any revisions to the outcomes framework arrangements. Welsh Women’s Aid could help coordinate this communication through our role.

2.4 Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services:

There is a call from VAWDASV specialist services for greater consistency across Wales in terms of the type of data that is collect, what are direct and indirect costs and expected impacts/outcomes required in the monitoring and evaluating of the Supporting People programme. In addition, a survivor has said that:

¹⁴ 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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“This for me would link in with the tendering and re-tendering processes. If organisations have to show budget breakdowns and their reasons, this will highlight the balance between value for money and a quality of provision that is high enough to be effective. Failures due to poor service and lack of funds is all too familiar a story.”

Question 3: The distribution of Programme funding and financial planning

3.1 The issues that need to be considered in developing and implementing a new funding formula:

Welsh Women’s Aid would like to see a new funding formula that includes ring-fencing for VAWDASV services and protects the national network of refuges that are so essential to protecting survivors of violence and abuse. While some member have called for more information, others have suggested a model that ensures “VAWDASV specialist services are enshrined in any funding considerations.”

Another VAWDASV specialist service stated that:

“The lack of uncertainty of future funding does not allow for consistency of service delivery, specialist providers will and are disappearing, skills and knowledge gaps will develop and the impact on the public purse will increase as more pressure will fall onto other public services.”

This was supported by feedback from survivors that said:

“Service providers need to be able to plan ahead, so re-instating 3-year allocations is the starting point for this.”

A smaller specialist organisation has also said that it would be helpful if some funding was available to smaller VAWDASV organisations who support people with multiple disadvantages, either directly or by working in partnership with others.

3.2 How budget pressures and funding uncertainties have affected service planning and delivery:

Welsh Women’s Aid has carried out research with our members into the current budget pressures and funding uncertainties for VAWDASV specialist services. Our *State of the Sector* report¹⁵ published in December, noted the impact of year on year losses either as a result of direct cuts to grants or years of standstill funding. It noted that while the overall funding for Supporting People was maintained in 2017/18, there was a 4% decrease in total funding for VAWDASV services from the Supporting People grant.¹⁶ This has direct impact on the provision on service for survivors of VAWDASV; 500 survivors

¹⁵ <http://www.welshwomensaid.org.uk/wp-content/uploads/2017/12/WWA-State-of-the-Sector-2017-ENG.pdf>

¹⁶ Welsh Women’s Aid, ‘Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales’, 2017.



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(456 - 90% were women) were unable to be supported in refuge because of a lack of service resources or capacity.¹⁷

Welsh Women's Aid members have highlighted that short term planning is not suitable and could impact on the quality of provision for VAWDASV survivors. One service has voiced concerns shared by many:

"We have no idea if we will get Supporting People funding next year. Our workers have not had a pay rise in 3 years so are still payed at basic rates. We cannot increase rents to deal with the increases in electricity, costs of council facilities yet we are asked to do more under contract. Supporting People does not pay for any of our monitoring costs."

A survivor, who accessed temporary accommodation when leaving an abusive relationship, has stated:

"It leaves VAWDASV organisations (and particularly dedicated staff members) feeling their hands are tied when implementing actions because they do not know if they will be able to complete them."

Another specialist VAWDASV service has said:

"Budget pressures and funding uncertainty affects service delivery, much mitigated by professionalism and maturity of the sector working together to maintain value for money, strategic planning, commissioning and procurement to try and stabilise good service provision. But uncertainty and cuts planning, annualised budgets does result in some knee jerk commissioning impacting upon operational delivery."

The evidence from VAWDASV specialist services in Wales is that there is a lot of uncertainty of the funding landscape moving forward, with proposed changes to Supporting People and other VAWDASV grants from Welsh Government, and continuing competition for ever more limited funding. This is all occurring in a context of increasing need for specialist support for survivors of VAWDASV. A corresponding increase in the presentation of complex needs and multiple disadvantage means some specialist services are struggling under the strain of a lack of capacity. For specialist BME, children and young people and disability services, this adds an extra level of pressure to their services to ensure need is properly evidenced and accepted for these groups. Survivors are accessing specialist services with increasingly high-levels of support needs as a result of their experience of abuse, which intersects with living with severe and multiple disadvantage. Many services do not always have sufficient resources or capacity to deliver the level of sustained intensive support needed in these cases.

The Welsh Government has outlined a national commitment to delivering sustainable funding for VAWDASV specialist services within the National VAWDASV Strategy 2016-21, in which Supporting People Programme Grant has a critical role to play. Welsh Women's Aid has mapped the resources funding the VAWDASV specialist services in Wales for Welsh Government, to inform this work. We now need this commitment to be delivered, across government – in a way that includes the Supporting People Programme - to ensure this becomes a reality.

¹⁷ Welsh Women's Aid, 'Summary of 2016/17 Data from Specialist Services in Wales', 2017.



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3.3 Reasons for the identified wide variation in financial support for different client groups across local authorities:

Our members have stated that there are various reasons for this, “from multi/complex high needs vs low level needs, peripatetic services vs accommodation based costs, engagement rates across client groups, clients in situ vs non-additional investment streams.”

A domestic abuse survivor stated:

“This is about quality of provision. If it is not sufficient, i.e. if staff are not sufficiently qualified and experienced and their salary reflects this, if one-to-one support time is limited, and so on, those moving through the system into independence fail and end up back in the supported accommodation system all over again. So I would want to look at the difference in amounts of financial support against the level of support provided. Cuts and savings often lead to greater expense in the longer term.”

Differing client groups funded within the Supported People Grant require differing interventions and levels of support. VAWDASV support requires specialist provision that provide strengths-based, needs-led, trauma informed approach for supporting survivors and their children to build resilience and foster independence and freedom from abuse. As stated earlier and reiterated by the survivor feedback above, this investment in the short term in early prevention and effective support will lead to greater savings and value for money in the long term. VAWDASV specialist services ultimate aim of reducing the number of survivors and children living with abuse and the long term costs associated with abuse to survivors, services and society.

Investment in to provision must be appropriately matched to the needs of the client group and achieving long term positive outcomes.

3.4 Reasons for the noticeable change in the overall proportion of programme funds spent on floating and fixed support:

One member stated that contractual changes are having an effect on supply mapping, noting for example the move from sheltered to tenure-based services to peripatetic floating support, in addition Supporting People contracts are based on hours or flexible floating support and only referencing fixed sites.

This trend is often based on the false perception that floating support is more cost effective and is a preventative approach to housing needs, however this is not based on the needs of survivors of VAWDASV. 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 support that enables them to achieve long term outcomes, and which proves cost effective in the long run. Further to this, preventative support can encompass ‘fixed’ refuge provision as it prevents further abuse, and the support provided can prevent a number of negative outcomes.



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3.5 The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns:

Feedback from some Welsh Women’s Aid members stated that local and regional planning process and spending simply did not reflect well-evidenced needs. This again is reported as a postcode lottery, with some areas raising concern about *how* needs assessments are carried out to inform commissioning. This is of particular concern to specialist services that have not traditionally been locally funded, for instance BME specialist services. There is a need for a consistency in approach the assessment of need that takes into account the national picture as well as local need. There are concerns that some Supporting People commissioning processes do not seek to identify hidden or unsupported needs and therefore expand the reach of Supporting People but focus on people or providers ‘that have used Supporting People’ services/funding previously. It is suggested that Supporting People 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.

Commissioning guidance will be vital to ensure that the planning processes are effective and based on well evidenced need. Welsh Government is currently drafting statutory commissioning guidance for VAWDASV provision, this should inform the planning processes in local and regional areas and hold them to account on effectively assessing need and commissioning well evidenced provision. To do this Supporting People Teams will need to consult with the VAWDASV specialist sector and survivors. Local authorities are also developing VAWDASV strategies and commissioning plans and it will be critical that Supporting People Programme planning processes and spending are integrated within these.

Welsh Women’s Aid and VAWDASV specialist services across Wales have contributed to the production of the VAWDASV commissioning toolkit, supported by Welsh Government and written and published by Lloyds Bank Foundation.

We recommend

- The VAWDASV commissioning toolkit is promoted to Supporting People leads and regional development coordinators to inform good quality commissioning (including needs assessment) and procurement of VAWDASV specialist services. The guidance can be found here: http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/VAWDASV-Toolkit_Wales_web.pdf

Welsh Women’s Aid would again like to thank the Public Accounts Committee of the National Assembly for Wales for the opportunity to comment on this important Programme. Welsh Women’s Aid is also available to provide further written and oral evidence around this issue if required.

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