



How do we assist Welsh Ministers in measuring a nation's progress?

Consultation response form

Your name: Elinor Crouch-Puzey

Organisation (if applicable): Welsh Women's Aid

e-mail/telephone number: EliCrouch-Puzey@welshwomensaid.org.uk

Your address:
Welsh Women's Aid
Pendragon House,
Caxton Place,
Pentwyn,
Cardiff,
CF23 8XE

Responses should be returned by **19 April 2019** to

National Milestones for Wales
Cabinet Office
Welsh Government
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

e-mail: cabinetoffice@gov.wales



A. Changes to the criteria to select national indicators against which national milestones will be developed

1. Do you propose any changes to the criteria?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

2. If yes, is the proposed change an additional criterion or an improvement to one of the existing criteria? (Please tick one box)

Additional	<input type="checkbox"/>
Improvement	<input checked="" type="checkbox"/>

3. If an improvement, which existing criterion will be improved?

Welsh Government justifies its use of a small number of indicators in its criterion within the consultation document to ‘focus their energies on making the key changes that make it more likely that we will meet these goals’. Welsh Women’s Aid is concerned that it will not be possible to meet these goals without specifically naming violence against women, domestic abuse and sexual violence (VAWDASV) as a barrier to achieving equality and improved wellbeing in Wales.

We do not feel government can accurately measure progress towards the seven wellbeing goals if efforts to tackle VAWDASV are not specifically measured. While we appreciate there are specific VAWDASV indicators being planned (recently consulted on, which Welsh Women’s Aid has responded to) this has not been named within this consultation on measuring a nations progress or indeed any link made to them within the wider 46 indicators. The small set should therefore specifically name VAWDASV as an area to tackle, particularly given there is a statutory duty in Wales to prevent violence against women and girls and given its impact across various policy areas (as explored throughout this response).

Under point 2 ‘capable of being influenced significantly by our devolved government’ we agree it is important to measure where Welsh Government can have the biggest impact. This is again an opportunity to measure VAWDASV as many of the areas impacted by it; housing, education, health and transport are devolved.

Action under point 3 ‘achieving this milestone will unlock progress in a range of areas’; we would again argue that specifically naming VAWDASV and working across the different policy areas impacted by it can help here. The consultation



document specifically names the link between education and health and healthy resilient communities. All of these areas are impacted by VAWDASV. The evidence is clear that physical and mental health are impacted negatively (both in the long and short term) by experiencing gender based violence¹. In turn educational attainment² can be impacted by children living in a household where there is abuse.

Point 4 which relates to having a generational effect and preventing poor outcomes that have a knock on effect for future generations is a clear opportunity to name and work to eradicate VAWDASV for future generations. Experiencing or witnessing abuse as a child is a known adverse childhood experience (ACE), perpetrators can also deliberately act to damage a relationship between the mother and child as part of his control. While children who experience ACEs may be more likely to go on to develop health-harming and anti-social behaviours, survivors who experienced ACEs as children have also highlighted that with the right support 'adverse childhoods did not have to mean poor later life outcomes'³. Therefore, while indicators 3 and 5 name 'healthy lifestyle behaviours' there is no indication in the document that this will consider VAWDASV as a driver. We may then be doing future generations a disservice by not including tackling VAWDASV as central to achieving the wellbeing goals.

4. Please provide your new or improved criterion.

See above.

5. Please tell us why this new or improved criterion will fit with the other criteria and best support development of a small set of national milestones that will assist Ministers in assessing progress for the whole of Wales towards the seven well-being goals.

¹ <https://www.womenshealth.gov/relationships-and-safety/effects-violence-against-women>

² <https://www.teachers.org.uk/files/active/0/Domestic16pp-3902.pdf>

³ Breaking Down the Barriers, AVA and Agenda, page 9 <https://avaproject.org.uk/wp/wp-content/uploads/2019/02/Breaking-down-the-Barriers-full-report-.pdf>



Rather than a new criterion, Welsh Women's Aid recommends weaving the importance of and specifically naming VAWDASV as central to the criterion. We also feel that it should specifically look to measure the impact of VAWDASV across many of the indicators which could be impacted, such as mental health, healthy pregnancies, poverty, homelessness etc.

6. Do you propose removing any of the existing criterion?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

If yes, which criterion do you wish to see removed and why?

N/A

B. Changes to the small set of national indicators against which national milestones will be developed

7. Do you propose any changes to the small set of national indicators against which we propose to set national milestones?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

8. Do you propose to remove or add national indicators from the small set against which we propose to set national milestones? (Please tick one box)

Remove	<input type="checkbox"/>
Add	<input checked="" type="checkbox"/>

9. If you are proposing an additional national indicator against which a milestone should be set, which national indicator do you propose adding?



Welsh Government wants the select national indicators to assess progress against the seven well-being goals – we are concerned that the selected indicators will not help to achieve these.

Welsh Women's Aid is concerned that the selected indicators and indeed the wider 46 indicators are not an accurate representation when considering VAWDASV, or the situation of women and girls. These phenomena impact on every aspect of life and therefore across all areas of government policy. It is impossible to achieve the seven wellbeing goals without directly naming and looking to tackle VAWDASV within the milestones. Additionally, and inexplicably, there is no mention within the proposed indicators of the separately developed national VAWDASV indicators, this should be explicitly linked.

The 15 selected indicators do not directly consider VAWDASV or wider issues of inequality. While Indicator 17 (gender pay difference) has been included, this will not measure other issues related to gender inequality, such as VAWDASV. Looking to tackle the gender pay difference alone will also not achieve the seven wellbeing goals. It isn't possible to separate the gender pay difference from wider gender inequality; finances continue to be gendered and men who control women can exploit this to their benefit. Therefore we cannot separate the experience of women who are forced into economic dependency by controlling partners with the wider issue of women's 'lesser economic status'⁴. Any work to close the gender pay gap, must consider the use of economic abuse and control as a factor in maintaining financial inequality. **We therefore strongly recommend that all indicators being collected disaggregate the data by sex/gender.**

Indicator 29 (mean mental well-being score) may pick up on women impacted by VAWDASV; research has found that 69% of women accessing mental health services have experienced domestic abuse or sexual violence⁵, however this is not explicitly named so there is no guarantee it will be measured in this way. Clearly in order to achieve the seven goals, tackling VAWDASV must be essential to improving the mental health of women across Wales.

Therefore, apart from the addition of wording to ensure data is disaggregated by sex, Welsh Women's Aid proposes including a new indicator (within the 15 selected indicators) which directly names VAWDASV and ensures that any work towards the wellbeing goals feeds back to the VAWDASV national indicators.

⁴ A Review of Research and Policy on Financial Abuse within Intimate Partner Relationships, Sharp-Jeffs, page 4 <https://www.londonmet.ac.uk/media/london-metropolitan-university/london-met-documents/faculties/faculty-of-social-sciences-and-humanities/research/child-and-woman-abuse-studies-unit/Review-of-Research-and-Policy-on-Financial-Abuse.pdf>

⁵ <https://avaproject.org.uk/ava-services-2/multiple-disadvantage/promoting-recovery-mental-health-primh/>
Pendragon House, Caxton Place | Pentwyn, Cardiff | CF23 8XE

Tel: 02920 541551 | Fax: 02920 736128 |

Email: info@welshwomensaid.org.uk | Web: www.welshwomensaid.org.uk

Registered Charity Number: 1140962



The wording proposed is taken from the indicators for the UN's Strategic Development Goal number five: 'Achieve gender equality and empower all women and girls'.⁶

Three of the most relevant indicators for this include:

5.2.1 Proportion of ever-partnered women and girls aged 15 years and older subjected to physical, sexual or psychological violence by a current or former intimate partner in the previous 12 months, by form of violence and by age

5.2.2 Proportion of women and girls aged 15 years and older subjected to sexual violence by persons other than an intimate partner in the previous 12 months, by age and place of occurrence

5.3.2 Proportion of girls and women aged 15-49 years who have undergone female genital mutilation/cutting, by age

These can be updated and amalgamated to the following proposed new indicator:
Proportion of individuals aged 15 years and older subjected to violence against women, domestic abuse or sexual violence in the previous 12 months, by sex, by form of violence/abuse, by age and place of occurrence.

If you have answered the question above, please now consider which national indicators can be removed from having milestones, to keep a small set or to reduce the set further.

We do not propose removing any of the indicators as they can also help towards measuring progress in the response to VAWDASV, given its impact on healthy pregnancies, lifestyle behaviours, school attainment, income etc. However, much of these points can be interpreted in a myriad of ways, for example a healthy life expectancy at birth could be measured solely on whether a baby is born into poverty or to a mother with problematic substance use without any thought given to whether violence and abuse played a part. Therefore, as stated an indicator specifically measuring VAWDASV, linked to the VAWDASV indicators but also recognises that the other indicators could be impacted by VAWDASV should be included here, along with ensuring all data collected can be disaggregated by sex.

10. If you are proposing removing national indicators that we currently propose to set milestones against, which ones do you propose removing?

⁶ <https://sustainabledevelopment.un.org/sdg5> [Accessed April 2019].



N/A

11. Please provide an explanation for your proposed changes and the contribution they make to a small, balanced set of milestones.

N/A

Indicators 10, 18 and 21 are heavily influenced by decisions made by the UK Government and wider economic conditions. The national milestones need to be capable of being influenced significantly by our devolved government and therefore for these indicators it will not be appropriate to base our national milestone on an absolute “point” target. Instead we suggest a more appropriate approach would be to use some of the other methods described on page 13.

12. Do you agree with the rationale for this, or have you any other views on how we should approach areas not entirely within devolved competence?

Welsh Women’s Aid feels this is an opportunity for Welsh Government to indicate a progress position relative to other countries, as it states it hopes to do in the document. This could be achieved through alignment to the UN’s Strategic Development Goal 5, as outlined above.

While we agree that these indicators in particular are impacted by decisions at a UK level, they can also be impacted by other factors, namely VAWDASV; ‘poverty is an exhausting and grinding force that prevents women moving on from crisis;⁷ poverty, household income and whether someone is in employment could be improved through tackling VAWDASV and more work is needed to promote economic independence for women. As stated already, economic abuse is a common tactic within intimate partner abuse, and this can include preventing someone from keeping or finding work, which will of course impact data on employment. Additionally, we know financial hardship is common for women post-separation⁸ and many women accessing refuge are unable to work, often having to leave employment to move away to a safe place and cover the rent in refuge - women commonly have to rely on housing benefit in order to cover the cost.

⁷ Breaking Down the Barriers, Op Cit, page 33

⁸ The Economics of Abuse, S Davidge and L Magnusson, page 4 <https://www.womensaid.org.uk/wp-content/uploads/2019/03/Economics-of-Abuse-Report-2019.pdf>



Women who face multiple disadvantage are more likely to live in poverty and in turn are more likely to have suffered violence and abuse than women not in poverty⁹. Of course, some women are more likely to be in poverty, including minoritised women, disabled and/or LGBT women.

Poverty can be a key factor preventing women from leaving abusive partners and in turn the impact of abuse on self-esteem and mental health can make it harder for women to gain employment¹⁰.

Welsh Government should therefore consider wider causes and drivers to poverty and unemployment, particularly for women and those impacted by VAWDASV and what work can be done at a devolved level to eradicate economic control and abuse. Therefore, sex information should be collected and disaggregated as outlined above.

C. Changes to the existing 46 national indicators

13. Do you propose any changes to the existing 46 national indicators?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

14. What type of change are you proposing to the existing 46 national indicators?

(Please tick one box)

Removal of or change to an existing indicator	<input type="checkbox"/>
New	<input checked="" type="checkbox"/>

15. If you are proposing a change to an existing indicator/s or proposing a new indicator, please provide the version you propose.

⁹ Agenda; Joining the Dots https://weareagenda.org/wp-content/uploads/2015/11/Joining-The-Dots-Report_Final_b_Exec-Summary.pdf

¹⁰ Breaking Down the Barriers, Op Cit, page 34



Aside from lacking clarification that the 46 wider national indicators will collect and disaggregate the data by sex, as outlined above, they also do not specifically name VAWDASV despite many of them being impacted by it. Many would in fact improve if VAWDASV were eradicated, but without naming it as a key area to tackle, we are concerned the seven goals will not be met. Again, we recommend aligning with the UN's Strategic Development Goals – Goal Five.

Some of the wider 46 indicators could help towards an understanding of progress towards equality, but we are keen to understand how they will align with the National Indicators for VAWDASV. Relevant current indicators include:

Percentage of live single births with a weight of under 2500g:

- We know experiencing violence and abuse during pregnancy can lead to preterm birth, low birth weight and small for gestational age babies¹¹. Therefore, a good percentage of healthy birth weight babies could be an indicator that domestic abuse is being recognised earlier in pregnancy.

Measurement of development in young children:

- The impact of experiencing and witnessing abuse is well known in children and it is a recognised form of child abuse. We also know it can impact child development.

Percentage of people satisfied with their ability to get to/access the facilities and services they need:

- It is essential that people from across Wales can access the services they need. In order to fully tackle gender inequality, this must include access to specialist VAWDASV services. Ensuring equal access to services run by and for BME women and access for disabled survivors, women with insecure immigration status etc.

Percentage of people feeling safe at home, walking in the local area and when travelling:

- We know that the home is one of the most dangerous places for a woman to be. In the latest Femicide Census for England and Wales 2018/19, of the 113 women killed by men, 38.1% were killed in their own home and 37.2% in the home they shared with the perpetrator¹². Ensuring everyone feels safer at home cannot happen without tackling men's fatal violence against women.

¹¹ <https://www.rcog.org.uk/en/news/bjog-release-domestic-violence-during-pregnancy-doubles-risk-of-preterm-birth-and-low-birth-weight/>

¹² <https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2017/12/The-Femicide-Census-Report-published-2017.pdf> (pg 19)

- It is also essential to tackle sexual harassment of women as they use public spaces and transport, a point we have seen rising to new prominence due to the Me Too and Time's Up movement.

Percentage of people who are lonely:

- Deliberate isolation of women by abusive men can prevent them from maintaining relationships with friends, family and their communities. Survivors sometimes report losing touch with communities because they are blamed for not leaving an abusive partner. Women who flee abuse can also become incredibly isolated in the new area they have moved to. VAWDASV must therefore be considered as a driver to loneliness and work done with communities to understand how abuse can lead to isolation. Welsh Women's Aid is piloting the Change That Lasts model¹³, which aims to support communities to recognise the signs of abuse and act sooner. We feel it is important to use our, and the specialist VAWDASV sector's expertise to consider how loneliness can be tackled in this context.

Number of households successfully prevented from becoming homeless per 10,000 households:

- We know the threat of homelessness acts as a barrier to women seeking support and that insecure housing and homelessness continues for long-periods of time after initially seeking support. For example, the organisation Solace found 87% of women leaving emergency accommodation went into additional temporary accommodation¹⁴. Reducing the number of homeless or threatened with homeless families in Wales must address VAWDASV as a cause of homelessness, particularly for women and children. The lack of appropriate move-on options from refuge must be urgently addressed in an effort to tackle the inequality caused by homelessness.

However, these indicators do not specifically name VAWDASV or the sex of the individuals and could therefore be interpreted in different ways, without gender equality or VAWDASV being considered. This in turn could result in short term responses and the root causes not being addressed.

We therefore reiterate the point above and propose a specific indicator which links to the UN Strategic Development Goal five and looks to tackle and ultimately eradicate VAWDASV and also links back to the national indicators for VAWDASV. This should place a clear expectation on the national milestones working towards these indicators as well:

¹³ <http://www.welshwomensaid.org.uk/what-we-do/our-approach-change-that-lasts/ask-me/>

¹⁴ https://www.mappingthemaze.org.uk/wp/wp-content/uploads/2017/08/Solace-Womens-Aid-housing-report_The-price-of-safety_Mar16.pdf



Proportion of individuals aged 15 years and older subjected to violence against women, domestic abuse or sexual violence in the previous 12 months, by sex, by form of violence/abuse, by age and place of occurrence

16. If you have proposed a new indicator, please now consider which national indicators can be removed, to keep a small set or reduce the set further.

We do not propose removing any indicators.

17. If you are proposing removal of an existing national indicator, please identify that indicator.

N/A

18. Please tell us why your proposed change to the existing 46 national indicators will support us in measuring progress towards achieving the well-being goals.



VAWDASV is a cause and consequence of gender inequality. It is impossible to achieve a fairer, more prosperous or more equal Wales when 1 in 4 women are subject to abuse and 1 in 5 experience sexual violence¹⁵. Alone these experiences are traumatic, dangerous and sometimes life threatening, but the wider, long-term impact of such violence and abuse ripples out across communities and wider society. It impacts on the number of women and children at risk of or facing homelessness, it impacts on health services, it impacts children's educational attainment, it impacts women being able to use public transport without the fear of or actual experience of sexual harassment or violence, it can impact on women's poverty, debt and ability to work and to achieve an equal economic footing with men. Without placing the eradication of VAWDASV at the centre of work to bring about improved wellbeing for people across Wales, it will be impossible to achieve the seven wellbeing goals.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here

¹⁵ <https://www.endviolenceagainstwomen.org.uk/about/data-on-violence-against-women-and-girls/>
Pendragon House, Caxton Place | Pentwyn, Cardiff | CF23 8XE
Tel: 02920 541551 | Fax: 02920 736128 |
Email: info@welshwomensaid.org.uk | Web: www.welshwomensaid.org.uk
Registered Charity Number: 1140962