

**Welsh Women's Aid response to the call for comments on the National Strategy on Violence against Women, Domestic Abuse and Sexual Violence: 2016-2021**

Welsh Women's Aid has welcomed the final strategy from the Welsh Government. During the consultation period Welsh Women's Aid participated in workshops with officials, submitted a written consultation response and provided feedback within our role on the Advisory Group. It is clear that the Welsh Government has heard some of our concerns and responded to our consultation responses, taking into consideration some of our key points.

Within our response to the strategy we outlined ten key points that were pertinent to be addressed to ensure the strategy was effective. These points are outlined below with our explanation as to how these have been addressed and to what extent in the final strategy.

**1. Keeps the UN VAW definition of violence against women as in the Right to be Safe Strategy.**

Welsh Women's Aid strongly welcomes that the strategy now includes the UN definition of Violence against Women and recognises that gender inequality is both a cause and consequence of violence against women. This will allow for clear continuation from the Right to be Safe Strategy 2010-2016, ensuring a commitment to tackling violence against women as a means of addressing gender inequality and ensuring Welsh women's human rights are protected. It ensures that the Welsh national strategy aligns with the UN, World Health Organisation, Crown Prosecution Service, UK governments and others. It means that the strategy is grounded on internationally recognised evidence base that supports a gendered approach to all forms of violence against women, including domestic abuse and sexual violence.

**2. Includes long term objectives around primary prevention linked to gender equality work.**

Welsh Women's Aid welcomes the inclusion of a specific objective on primary prevention through raising awareness and challenging social stereotypes, attitudes, behaviours, and expectations. We also welcome the commitment to develop a National Communications Framework in consultation with stakeholders. This will require an appropriate budget line that goes beyond the cost of running one off campaigns but also recognises the need for evaluation of success in achieving long term change that any campaign should aim for and the short term increase in disclosures that should result from an effective campaign on violence against women. Investment in increasing the capacity of specialist services to respond to this increase must form part of the communication delivery plan. Similarly resources will need to be invested in specialist services to be involved in the evaluation of campaigns, especially their role in enabling survivors to participate in the evaluation processes.

While we welcome the priorities on challenging cultural attitudes, they continue to focus on BME communities and men and boys. We agree that these communities need to be included in the prevention of violence against women, however there is a need to challenge all cultural attitudes that underpin violence against women, domestic abuse and sexual violence, and therefore community champions from across all communities in Wales. Cultural attitudes persist across all communities, including victim blaming and rape myths, that enable all forms of violence against women to continue to be prevalent in our communities. The priority to

challenge these through effective communication plan as well as through education needs to form part of the delivery plan and subsequent communications framework.

**3. Commits to working with the specialist third sector to develop a model for sustainable funding for specialist services from 2017, to include specialist services for children and young people.**

Welsh Women's Aid welcomes that the strategy now recognises the crucial role of violence against women, domestic abuse and sexual violence specialist services specifically adding an action to develop a model for sustainable funding of this sector. This is particularly welcomed as domestic abuse/violence against women services that are Welsh Women's Aid members have stated that they are already under significant pressure and are concerned by an increase in demand without more investment to secure sufficient service levels across Wales.

While the strategy now outlines the priority to develop a model of sustainable funding for specialist sector, this needs to be reflected in the statutory guidance which needs to ensure collaboration between different commissioners including community safety, safeguarding, housing, supporting people, health and education as well as with non-devolved partners such as Police and Crime Commissioners, especially at local and regional levels.

The development of a model for sustainable funding of specialist services needs to be clearly outlined in the delivery plan with a definitive timeframe for delivery and clear mechanisms for this model to be co-produced with the specialist sector and collaboration across funding streams. This is a very pertinent issue as re-commissioning processes and local strategy development is already underway and having an impact on the funding of specialist services.

**4. Sets out the 'Change that Lasts model' as an early intervention coordinated community service model, to align with the Home Office Strategy.**

Objective 6 in the strategy sets out to provide survivors with holistic and resourced needs-led, strengths-based, gender-responsive support. This reflects the principles of the Welsh Women's Aid 'Change that Lasts' service model which delivers a needs-led, strengths-based, gender-responsive and trauma informed model of delivery involving survivors, communities, specialist services and trained trusted professionals to achieve earlier intervention and prevention of abuse and transforms how professionals and communities respond and how services are structured. This model is highlighted as an innovative good practice approach in the UK Government strategy, and there is significant scope and interest in delivering this approach within a violence against women legislative and policy context in Wales. This model provides a framework that facilitates the shortest and most effective route to safety, freedom and independence for each survivor based on their individual situation and the resources available to them.

It will be integral for the delivery plan to match this objectives commitment to the 'Change that Lasts' model and ensure that there is a model for sustainably funding its development and delivery, reflecting the commitment outlined above. The delivery plan will need to ensure that the actions support the development of this model in practice to build in the support for it in principle in the final strategy.

**5. Includes the 10 key recommendations made by survivors in the report to the Advisory Board in the strategy and ensure the detailed recommendations in the report inform the delivery plan.**

Welsh Women's Aid welcomes the clearer reference to the recommendations from survivors that were within our 'Are you listening and am I being heard? Survivor Consultation: A report of the recommendations of survivors of violence against women, domestic abuse and sexual violence in Wales', March 2016. We support the priority for developing a sustainable survivor engagement framework as part of the preventative priorities as well as other areas, which must include survivors being central to monitoring the implementation of the strategy, plan and accountability mechanisms. This must be resourced to ensure that it is not tokenistic but enables the diverse voices of survivors to continue to inform the delivery of the strategy.

These 10 recommendations now need to be reflected in the delivery plan so that action is taken to achieve what is needed. The Welsh Government will need to work with specialist services and survivors to ensure these recommendations can be delivered through SMART actions that are sufficiently resourced to be achievable and make a sustainable difference.

**6. Includes cross-governmental commitments for delivery from other Cabinet Secretary portfolios including health, education, local government and finance.**

As was outlined in our evidence and consultation response regarding the strategy, the impact of violence against women crosses many areas including health and wellbeing, education, housing, criminal justice, social services, children's services and equalities. Welsh Women's Aid has recommended that there should be cross-departmental investment into prevention, protection and provision of support in response to violence against women, domestic abuse and sexual violence. While this is referenced within the strategy, there now needs to be high level commitment to achieving this. This will require commitment across Cabinet Secretary portfolios to recognise cross-department responsibility and commit relevant resources. We would recommend that the delivery plan reflects cross-departmental commitments and accompanying investment to reflect this. This would reflect the commitments also made by Welsh Government in Taking Wales Forward 2016-2021 to "work across traditional boundaries" to deliver on priorities.

**7. Provides national leadership that clarifies the responsibility of regions and local public services to deliver against the objectives and outcomes.**

Welsh Women's Aid welcomes the inclusion of an action to develop guidance for local authorities and health boards to support them in the development and delivery of local strategies. The Welsh Government needs to provide leadership to local and regional commissioners on delivery of a collaborative model and hold them accountable for delivering a sustainable funding for specialist services in their region or locality. This should include effective governance and accountability for commissioning decisions via public service boards and regional collaborative committees, it remains unclear as to how the Welsh Government will hold relevant bodies to account in doing this.

**8. Cross-references to the UK Ending VAW Strategy for join with non-devolved objectives, in particular under protection.**

Welsh Women's Aid welcomes the reference made to the UK Government 'Ending Violence against Women and Girls Strategy 2016-2020' however the commitment to work collaborative

or have joined up approaches within the objectives and priorities set out in the final strategy remains minimal. The UK governments National Statement of Expectations are anticipated to be published imminently. There needs to be clear alignment between the commitments in the National Statement of Expectations and the delivery of the Welsh Government strategy to ensure that the provision of protection and support for survivors is cohesive across devolved and non-devolved remits. This needs to be reflected within collaborative actions within the delivery plan.

**9. Ensures the priorities are SMART and set out clear and measurable targets and timescales within the delivery plan.**

The delivery plan for the strategy needs to set out how the objectives and priorities are going to be achieved in a SMART manner that have clear outcomes and are measureable over a set timeframe. The delivery plan will need to include join up across relevant stakeholders including specialist services, it is therefore crucial that specialist services and other stakeholders involved are given an opportunity to consult and propose the actions set out within the plan. The specialist violence against women sector and survivors are keen to contribute their expert knowledge and experience to the development of the accompanying delivery plan. This should include a clear commitment to co-producing the delivery plan to ensure the actions meet the needs required and are achievable through the commitment and support of all stakeholders. We would welcome a clear proposal and timeframe as to how this has will be done.

The Wales Violence Against Women Action Group, which holds significant expertise within its membership, has offered to provide a task and finish group to consult on the development of the delivery plan, we are aware that this was noted during the post legislative review evidence sessions and Welsh Women's Aid, in consultation with the group, would like to reiterate that this offer stands.

**10. Cross-references the priorities to the Istanbul Convention principles to support specialist services and perpetrator intervention.**

We welcome that fact that the strategy supports the principles of the Istanbul convention and the statement to strengthen the Welsh Governments commitment to set out further measures relevant to the provisions of the convention. The convention establishes legal frameworks for the protection of women, punish perpetrators and to prevent and eradicate all forms of violence against women setting out minimum levels of provision. Member states are required to establish a comprehensive and coordinated policy addressing all forms of violence covered by the Istanbul Convention and offering a holistic response to violence against women. This includes the provision of refuge, floating support and support for sexual violence survivors and commit to providing the minimum standards of support for women and children as outlined by the Council of Europe. The inclusion of these principles and key provisions sets out a clear commitment by the Welsh Government to achieve these minimum standards and these should be reflected in the actions outlined within the delivery plan to ensure these are achieved.

**Budget**

Further to the points outlined above a critical issue with the final strategy is that throughout the strategy it remains unclear how any of the objectives and priorities will be resourced. The

strategy is not accompanied with a clear budget commitment to ensure that the strategy objectives and the related actions in the delivery plan are sufficiently resourced so as to be effective in achieving the ambitious aim of ending all forms of violence against women in Wales. The delivery plan needs to demonstrate how the actions will be clearly resourced and, similarly, set out how the delivery will be monitored.

#### **Broader Focus**

The strategy is still minimal on its reflection of the broadened approach the Act to incorporate all forms of violence against women including sexual violence, HBV, FGM and forced marriage as well as domestic abuse. The delivery plan will need to have a wide remit to tackle all forms of violence against women and work in collaboration/synergy with effective strategies and guidance, such as the forced marriage guidance, that are already in place.

Overall, as stated above, Welsh Women's Aid has welcomed the final strategy; we now need to see the principles and priorities outlined in the strategy built into practice through an effective delivery plan that is co-produced and accompanied with sufficient resources to ensure it is achievable.

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Any comments or questions regarding our response can be directed to: **Gwendolyn Sterk, Public Affairs Manager, 02920 541 551, [gwendolynsterk@welshwomensaid.org.uk](mailto:gwendolynsterk@welshwomensaid.org.uk)**