

SSP 25

Ymgynghoriad ar flaenoriaethau'r Pwyllgor Llywodraeth Leol a Thai ar gyfer y Chweched Senedd

Consultation on the Local Government and Housing Committee's priorities for the Sixth Senedd

Ymateb gan: Cymorth i Ferched Cymru

Response from: Welsh Women's Aid

Priorities for the Local Government and Housing Committee under the Sixth Senedd: Welsh Women's Aid response

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About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (comprising our membership of specialist services and members of the regional VAWDASV Specialist Services Providers Forums). These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors.

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

Introduction

Welsh Women's Aid welcomes the opportunity to respond to this consultation on priorities for the Local Government and Housing Committee under the Sixth Senedd. Violence against women, domestic abuse and sexual violence (VAWDASV) is both an affront to women's human rights and a major public health concern.¹ All directorates have a role in supporting survivors and ending violence against women in all its forms, as acknowledged in the duties in local government and devolved public sector bodies in the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.²

Welsh Women's Aid would suggest that the committee recognise that violence against women is a key agenda to incorporate within its scrutiny programme both in the next 12-18 months and in the longer term regarding housing and local government, and consider the following areas as possible priorities by which it could include violence against women in its future plans.

Prevention, early intervention and local authority duties

The new Welsh Government National VAWDASV Strategy is currently being developed for implementation beginning in 2022. Welsh Women's Aid sit on the advisor group which is helping shape the strategy, and a strong consensus across sectors is one of the core driving principles for the strategy being prevention and early intervention. The responsibility for funding primary prevention interventions should not fall on singular local authorities streams or trust funds, and in our Prevention Blueprint³ we advocate for a multi-sector approach to funding prevention, which includes particularly housing and other local authority remits. Local authorities and commissioners play a crucial role in in this multi-sector approach. We have strongly recommend that the new strategy clearly defines duties and expectations for local authorities, health boards, housing and PCCs to invest in specialist service provision.

According to the Wales Audit Office review there is currently little to no evidence of 'primary prevention' in VAWDASV specialist services commissioning in Wales.⁴ Unfortunately, there has been no significant change since the Wales Audit Office made the observation in their review of progress against the VAWDASV Wales Act 2015⁵ that there was little money for prevention. While it is positive that we continue to see acknowledgements of the importance of prevention work (which also facilitates a greater level of earlier intervention), we would urge the committee to launch and inquiry into the prevalence of preventative services and

¹ <https://www.who.int/news-room/fact-sheets/detail/violence-against-women>

² <https://www.legislation.gov.uk/anaw/2015/3/section/1/enacted>

³ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/12/A-Blueprint-for-the-Prevention-of-VAWDASV27918.pdf>

⁴ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/12/2019-Welsh-Audit-Office-VAWDASV-Report.pdf>

⁵ <https://www.audit.wales/publication/progress-implementing-violence-against-women-domestic-abuse-and-sexual-violence-act>



the scale at which prevention interventions are delivered. Additional funds must be sourced to enable this change, and until such a change does happen, we will continue to see resources being depleted and the need for more intensive interventions increasing.

Intersectionality

Often, ‘targeted’ prevention intervention will be justified on the basis of ‘increased risk of victimization / perpetration’. It is essential however, to understand that experiences of VAWDASV are shaped/ exacerbated by multiple systemic factors, such as the marginalisation of minority voices, limited access to justice and support, and an effective erasure of experiences (e.g. children and young people, disabled women, Black and ethnic minority women, migrant women, and LGBTQ+ women). Targeted interventions are therefore essential in order to communicate and engage in the most suitable way with a diversity of people.

Challenges of accessing appropriate support and housing services are exacerbated by systemic oppression. Through its inquiries we urge the committee to highlight the unique experiences of survivors of abuse and the ways in which difference and disadvantage may help or hinder access to support, safety and justice. Difference such as age, sex, gender, class, ethnicity, ability and sexuality intersect to inform lived experiences and these factors can further reinforce conditions of inequality and exclusion. This means that violence against women and girls can also be connected to factors such as ethnicity, age, class, disability and sexuality. Specialist services are committed to anti-discriminatory practice and to address the intersecting inequalities experienced by women and men, when delivering support services.

Housing

There are significant links between violence against women and homelessness. It has long been recognised that domestic abuse and other forms of violence against women is a leading cause of homelessness for women.⁶ In preventing homelessness it is critical that the duties imposed by the Housing Act (Wales) 2014 enable survivors to access refuge and other accommodation options swiftly, or where appropriate, to stay safely within their own homes. Section 57 of this Act specifies that whether a person or a member of that person’s household is at risk of abuse, including domestic abuse, is a factor in determining whether it is reasonable to continue to occupy accommodation.⁷

We welcomed inquiry from the Equalities, Local Government and Communities Committee under the fifth Senedd on the Violence Against Women, Domestic Abuse, Sexual Violence (Wales) Act 2015, and are pleased to have contributed evidence both written and verbal. In that evidence we gave several recommendations between the joint responsibilities of both

⁶ https://safelives.org.uk/sites/default/files/resources/Safe_at_home_Spotlight_web.pdf

⁷ <https://gov.wales/sites/default/files/publications/2019-06/guidance-for-local-strategies.pdf>



the VAWDASV sector and the Housing sector in ending violence in Wales particularly around commissioning. These included:

- *Ensure Housing Support Grant commissioning covers all forms of VAWDASV, rather than a default assumption that a focus on domestic abuse meets the varying needs of all survivors of VAWDASV.*
- *Welsh Government to ensure that the VAWDASV commissioning guidance is mandatory for all commissioners, is applied across funding streams, and ensures commissioners for the Housing Support Grant and Children and Communities Grant understand the definition of specialist services and their role in maintaining a network of provision across Wales.*

A key recommendation for the Local Government and housing committee, will be to monitor the outcomes of this previous inquiry and ensure accountability for those responsible for implementing recommendations.

We would also encourage the committee to prioritise routes to housing and support for women facing multiple disadvantage as a key priority, and aligning housing support with VAWDASV support. In June we hosted a roundtable which focused on fully recognising sexual exploitation as a form of VAWDASV. This was with aim to aligning our response in Wales, with work to end VAWDASV and prevent, protect and support all survivors, and culminated in pledges signed by PCCS and other stakeholder towards recommendations to the Welsh Government for work to end sexual exploitation.

Further to this, there needs to clarity that housing support should cover all forms of VAWDASV, in particular barriers faced by women who have experienced sexual exploitation. Welsh Women's Aid currently chairs the Housing First for Women sub group, the group is currently collecting evidence on the model and discussing with several partners whether this model would be a suitable additional option for women who are sexually exploited or facing multiple disadvantage. We have seen an increase of people fleeing abuse during COVID with intersecting and complex support needs, making this priority much more critical.

No recourse to public funds (NRPF)

One of our biggest concerns is safety for women with NRPF fleeing abusive relationships. The Domestic Abuse Act (2021) has fallen short in its potential to protect and support all survivors, regardless of immigration status.⁸ We strongly advocate that it is time for Wales to develop its own solution to supporting survivors with no recourse to public funds, and make good on its claims of being a nation of sanctuary. This needs to include safe and secure

⁸ <https://www.welshomensaid.org.uk/wp-content/uploads/2021/05/Domestic-Abuse-Bill-Passed-Welsh-Womens-Aid-Briefing-.pdf>

accommodation, provision in refuge with local authorities working with specialist services to enable support for survivors with NRPF.

We propose the committee utilises its powers to call on the Minister's responsible for housing and local government to provide evidence as to how the Welsh Government is fully utilising its powers in regard to supporting people with NRPF. There is existing policy and legislation in Wales which, if implemented thoroughly and embedded into practice, could be effective in supporting migrant women. We would urge the committee to ensure that it holds the Welsh Government to account to ensure local authority housing leads have clear instruction on the responsibilities under the Social Services and Well Being (Wales) Act 2014 and consider the effectiveness of any future legislative change / updated guidance, if existing legislation is not being fully utilised.

Recommended Inquiries

- Scrutiny of Local Authority duties under both the VAWDASV 2015 (Wales) Act and the Housing Act (Wales) 2014, ensuring clear guidance included in the development of the new VAWDASV strategy and its delivery plan.
- Carry out an inquiry into the adequate commissioning and provision of specialist services.
- Scrutiny of the implementation of recommendations from the Equalities, Local Government and Communities Committee's recommendations from previous inquiry into the VAWDASV (Wales) 2015 Act.
- Scrutiny into Welsh Government's powers in regard to supporting people with no recourse to public funds.
- Scrutiny of the prevalence of preventative services and the scale at which prevention interventions are delivered.

Welsh Women's Aid is keen to support the priorities where there is relevance to violence against women. In particular, we would recommend that the above areas are considered when the committee considers the terms of reference for the inquiries and their calls for evidence. Welsh Women's Aid would welcome the opportunity to provide evidence to the committee on these areas outlined above. We would be able to consult with survivors and specialist service providers to provide quantitative and qualitative evidence to the impact of the policies being scrutinised. We look forward to supporting the committee in these inquiries.

