



National Federation of Women's Institutes-Wales

Response to the Communities, Equality and Local Government Committee consultation on the Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill

Background

The National Federation of Women's Institutes (NFWI) is an educational, social, non-party political and non-sectarian organisation. It was established to ensure that women are able to take an effective part in their community, to learn together, widen their horizons, improve and develop the quality of their lives and those of their communities and together influence local, national and international affairs. The WI has an unrivalled reputation as a voice of reason, integrity and intelligence on issues that matter to women and their communities.

The WI is a grass-roots, member-led organisation and is the largest voluntary women's organisation in the UK with more than 210,000 members in 6,600 WIs. In Wales there are 16,000 members belonging to 13 Federations and over 600 WIs based in local communities across the country.

The NFWI is committed to highlighting and fighting Violence Against Women (VAW) and over recent years WI members have been campaigning to raise awareness about all forms of VAW and the lack of support services available to women, especially those living in rural areas.

In June 2009, the WI launched independent research carried out on its behalf by Bristol University. The research compared and contrasted VAW in rural and urban settings and some of the key findings of the research are highlighted within this response.

Since 2012, NFWI-Wales has worked with Joyce Watson AM on the Not in my Name Campaign. Through the recruitment of male ambassadors, the campaign aims to raise awareness of VAW and help create a culture change where VAW is unacceptable.

NFWI-Wales is a member of the Wales Violence Against Women Action Group.

General Principles of the Bill

NFWI-Wales welcomes the general principles of the Bill.

NFWI-Wales is disappointed that 'ending violence against women' has been removed from the title of the Bill. Women are disproportionately affected and we had expected that the Bill

would be gender-specific. The current wording dilutes the focus on specifically addressing VAW.

It is disappointing to note that domestic abuse and gender-based violence are categorised separately in the title of the Bill. The separation of domestic abuse and gender-based violence can be misleading as domestic abuse is the most prevalent form of VAW.

International definitions of VAW include domestic abuse, including CEDAW and the UN Declaration on the Elimination of VAW. We are concerned that the title as it currently stands could lead to confusion and misinterpretation amongst decision-makers, commissioning bodies, agencies and the public.

Education and Prevention

We are disappointed with the lack of detail on the face of the Bill, particularly the lack of focus on education. This legislation is a unique opportunity to get to the heart of ending violence against women by creating a culture change so that VAW becomes unacceptable. In order for this to be achieved, education and prevention needs to be at the heart of the Bill.

Schools have a key role in preventing VAW before it starts. There is currently no compulsory education on VAW in schools and the education that is delivered is insufficient and patchy and does not focus adequately on all forms of VAW.

Education and prevention in schools is central to challenging the attitudes that persist in our society. In a past survey by NFWI, 74% of WI respondents stated that they were in favour of explicitly addressing VAW issues in schools.

To truly make a difference to the lives of women and girls, it is crucial that high quality and consistent educational and preventative initiatives on VAWG and healthy relationships are delivered across all schools as a compulsory element of the National Curriculum.

We acknowledge that the Welsh Government is supporting the expansion of healthy relationships education in schools and that healthy relationships is currently being considered as part of the national curriculum review. However, NFWI-Wales strongly feels that the exclusion of education and prevention initiatives in schools is a major omission in the Bill and that a whole-school approach to prevent and tackle VAW across the education system is needed if the Bill is going to achieve its goal of preventing gender-based violence. A whole-school approach would address the needs of pupils, staff and the wider community across the Curriculum and the entire learning environment within a school. The delivery of initiatives in schools must be a compulsory element of the Welsh Curriculum.

Schools have a significant role to play in the prevention of VAW by, for example, addressing VAW and healthy relationships in lessons, embedding the principles of respect and equality throughout the school and supporting children and young people affected by violence. By addressing and challenging from an early age the inequalities and attitudes that cause VAW, it is hoped that young people will grow up in a culture of respect and equality.

We are surprised that there is no reference in the Bill to challenging attitudes. High profile public information campaigns on VAW are needed focusing on challenging the inequalities and attitudes that cause VAW, not restricting women's freedom, and encouraging women who have experienced VAW to speak out. Nearly three-quarters of women who took part in NFWI's independent research said that VAW was not openly discussed in their communities. When respondents with experience of abuse were asked about help-seeking in telephone follow-up interviews, many said they did not disclose because of a sense of "shame". A lack of open discussion is a barrier that creates shame and stops people speaking out about their

experiences and creates misunderstanding about the nature, effects and causes of violence and abuse.

National and local strategies

We welcome the duty on Welsh Ministers to publish a national strategy and for local authorities and Local Health Boards to prepare local strategies.

We are concerned that due to the lack of detail in the Bill and the gender-neutral approach being suggested, that the national strategy could make little difference. It is vital that the focus of the national strategy will be on ending violence against women and that performance indicators are introduced to monitor its effectiveness.

We hope that, through local authorities and LHBs working together to produce local strategies, that approaches will be developed to address ALL forms of VAW. We note that in the past, there has been a tendency to focus solely or primarily on domestic abuse. It will be vital that local strategies address ALL forms of VAW and this must be reflected strongly in the national guidance issued to local authorities and LHBs in drawing up their strategies.

Local strategies provide an opportunity for local authorities and Local Health Boards to develop approaches unique to their areas. Quite often a different approach would be required in a remote or rural area in comparison to a city such as Cardiff. We hope, for example, that local strategies could address the significant issues that women in rural areas experience in terms of accessing services, isolation and poor provision of specialist support.

The independent research commissioned by the NFWI in 2009 found that VAW is just as prevalent in rural communities as it is in urban areas however it is seen as more of a hidden issue in rural communities and requires a different approach to addressing the issue. Rural women expressed concern about the confidential nature of services they received in their communities and the additional problem of transportation. Rural women also emphasised the role of health practitioners, in particular GPs, in providing confidential and safe services for women. Existing generic and specialist services must recognise and address the additional problems faced by rural women. As well as provision of services, access to the services available was also a crucial factor.

Appointment of a Ministerial Adviser

NFWI-Wales welcomes the appointment of a Ministerial Adviser as a step in the right direction however we have reservations regarding the potential impact of the role, particularly as the Adviser will be working for the Government.

We strongly believe that the Adviser should be independent of Welsh Government and his / her role should include holding the Welsh Government and other public bodies to account.

The main focus on the Adviser's role should be to end violence against women. We feel that it would not be effective for the Adviser to have a gender-neutral approach and would suggest that the title of the Ministerial Adviser is changed to reflect this.

The functions outlined for the Ministerial Adviser are very weak. We suggest that the functions of the Adviser are strengthened to include scrutiny of the national strategy and local strategies. The Adviser should also have the power to introduce sanctions for non-compliance with the Bill.

Our preference is for the appointment of an independent Commissioner. Current commissioners such as the Children's Commissioner for Wales and Older People's Commissioners have on occasions been able to speak out strongly on behalf of children and young people and older people respectively and have been able to publicly highlight

concerns and press for change. We fear that a Ministerial Adviser may not have the same impact as a Commissioner.

Potential barriers to the implementation of these provision and whether the Bill takes account of them

Limited funding could impact on the delivery of high quality and consistent services across Wales and the ability of service providers to deliver the services needed in their areas. The postcode lottery of service provision must be addressed. As well as increasing support services available to women, it must also be ensured that the services are accessible. We fear that the current postcode lottery of support services across Wales may continue without additional resources for service delivery.

Independent research undertaken by NFWI in 2009 found that services like Rape Crisis Centres and women's refuges that women value highly for tackling VAW are the ones they have least access to locally.

As previously noted, we feel that the lack of detail in the Bill could impact on the strength of the Bill to make a difference in tackling violence against women. The content of the Bill must be strengthened. VAW is a barrier to creating sustainable communities and requires a cross-governmental approach by the Government. As previously highlighted, we feel that the omission of education from the face of the Bill is a missed opportunity. The Bill is also an ideal opportunity to introduce a duty on public bodies to develop workplace policies and would urge the Government to introduce such duties to the Bill.

Unintended consequences arising from the Bill

The primary focus should at all levels of the Bill should be on ending violence against women and ensuring that this focus is central in national and local strategies developed.

Due to the gender-neutral nature of the Bill, it will be essential that strong guidance is issued to local authorities and service commissioners to ensure that gender-specific services are provided for women. We fear that a gender-neutral approach could result in misconceptions amongst service commissioners and providers that services must be offered to both men and women.

The independent research commissioned by the NFWI in 2009 found that women valued access to women-only support services such as women's refuges and a recommendation from our research was for good availability of women only services in rural and urban areas.

The financial implications of the Bill

A postcode lottery exists in accessing services and, as highlighted above, we question how the current gaps in service provision can be addressed without additional funding.

We are concerned that without adequate funding, consistency and quality of service provision will be difficult to achieve. Uncertainty in terms of funding can impact on services and resources through the need to continuously focus on securing funding and can take away their focus on service delivery.

Long term, sustainable funding is needed for VAW support services to deliver consistent and high quality services that meet the needs of victims. Without funding to support the delivery of the Bill and with the budget pressures faced by local authorities, we are concerned regarding the capacity of service providers to deliver services in the long-term that meet the needs of victims.

If the Bill succeeds in raising awareness of VAW and the support available to victims, service providers may be faced with increasing pressure to meet the additional demand for their services.

Sub-ordinate legislation

Due to the lack of detail in the Bill, we are concerned that sub-ordinate legislation may not address vital areas such as education in schools, public campaigns challenging behaviours and attitudes that contribute towards VAW and improving service provision.