

NSPCC Cymru/Wales

Response to:

**Communities, Equality and Local Government
Committee:**

**Consultation on the Gender-based Violence,
Domestic Abuse and Sexual Violence (Wales) Bill**

Date: September 2014

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NSPCC 
Dim mwyl o greulondeb i blant. DIM.
Cruelty to children must stop. FULL STOP.

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About us:

The National Society for the Prevention of Cruelty to Children (NSPCC) is the UK's leading children's charity specialising in child protection. Our vision is to end cruelty to children in the UK. We make a difference for all children by standing up for their rights, listening to them, helping them when they need us and by making them safe.

The NSPCC runs projects and services across the United Kingdom and Channel Islands to help vulnerable children. We also provide ChildLine, the UK's free, confidential 24-hour helpline and online service for children and young people and a helpline for adults who are worried about a child or want advice.

1 Introduction

- 1.1. NSPCC Cymru/Wales welcomes the opportunity to provide evidence to support Stage One scrutiny of the Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill (henceforth the Bill).
- 1.2. NSPCC Cymru/Wales has consistently called on the Welsh Government to see domestic abuse from a child's point of view and we welcome this Bill as a positive step forward. We are pleased that the overarching aims of the Bill to improve the **prevention, protection and support** for victims and people affected by gender-based violence, domestic abuse and sexual violence in Wales reflect a number of our core priorities for children and young people who experience domestic abuse.
- 1.3. Estimates show that around 150,000 children and young people in Wales are affected by domestic abuse at any one time.ⁱ During 2012-13, ChildLine bases across the UK carried out 3,114 counselling sessions where domestic/partner abuse was the young person's main concern. Of these, 98% told us who the person responsible was. Where the perpetrator of domestic/partner abuse was known, 76% were the young person's partner or ex-partner and 24% related to young people who witnessed domestic abuse in the family.
- 1.4. The profound impact intimate partner abuse can have on children, whether they are physically abused themselves; witness the abuse of another person, or experience abuse within their own relationships is well evidenced.ⁱⁱ At the same time it is important to recognise that there is no uniform response to living with domestic abuse, each child and each child's reactions are unique.ⁱⁱⁱ It can be hard to discern the specific impact on a child of living with domestic abuse, especially as some of the resulting behaviours co-occur in children experiencing other forms of abuse or neglect.^{iv} For many children the impact of living with domestic abuse is compounded by, and interwoven with, the impacts of the direct sexual and/or physical abuse they are also experiencing from the same, usually male, abuser.^v NSPCC research on child maltreatment showed that more than 34 per cent of under 18s who had lived with domestic abuse had themselves been abused or neglected by a parent or guardian.^{vi}
- 1.5. Research shows that domestic abuse is a central issue in child protection, and is a factor in the family backgrounds in two thirds of serious case reviews where a child has died.^{vii} The wide range of effects children might experience can include children becoming fearful or distressed, or suffering physical, psychological or emotional developmental problems which may be short-and/or long-term.^{viii} Children who experience domestic abuse often display more behavioural and emotional problems, both internal (such as depression and anxiety) and external (such as aggression or anti-social behaviour) than other children and they are more at risk of mental health difficulties in adult life.^{ix}
- 1.6. NSPCC Cymru/Wales also believes that this legislation provides a vital opportunity to fully recognise and address the fact that young people are at risk from domestic abuse in their own relationships. In 2009, research commissioned by the NSPCC from the University of Bristol^x found concerning levels of physical, emotional and sexual partner violence amongst teenage girls and boys:
 - **88 percent of young people had some kind of relationship.**

- A quarter of girls and 18% of boys reported some form on physical partner violence;
- Nearly three-quarters of girls and half of boys reported some form of emotional partner violence
- Just over a third of girls and 16% of boys reported some form of sexual partner violence.

1.7. Moreover, a growing body of literature into pre-teen relationship cultures is demonstrating that patterns of sexual coercion and harassment are not confined to older teens but are also emerging in the everyday lives of pre-teen children.^{xi} This was a core finding of the ‘Boys and Girls Speak Out’^{xii} research project carried out with 125 children in 8 schools across South Wales, on behalf of the National Assembly for Wales Cross Party Group on Children’s Sexuality, Sexualisation and Equalities (CSE), and funded by NSPCC Cymru/Wales, Cardiff University and the Office of the Children’s Commissioner for Wales. This evidence of the prevalence young boyfriend/girlfriend cultures in primary school highlights the need for appropriate measures and interventions to start early. NSPCC Cymru/Wales would like to see this gap addressed by the Bill.

2 About the NSPCC

2.1. The NSPCC is here to end cruelty to children. As part of the NSPCC’s Strategy towards 2016 we deliver services which are innovative, distinctive and designed to capture and disseminate learning. Section 1.4 highlights the cumulative and interwoven nature of the impacts of domestic abuse with other forms of child abuse and neglect. Our response to the multi-layered and intertwined nature of neglect and abuse has been the development of a suite of cutting edge new services, many of which are offered across our three service centres in Wales.^{xiii} Our service centres are designed to be places where children can feel safe and supported and better able to overcome the trauma they have experienced and our evaluation of the services we provide help us to understand the range of issues and any challenges in the prevention, protection and treatment of abuse.

2.2. As part of our suite of services on offer across Wales, NSPCC Cymru/Wales is currently operating and evaluating two services; DART and CDSC specifically to support children and families who are affected by domestic abuse. In Wales we will also shortly be delivering a new service ‘Protect and Respect’ which offers preventative and protective initiatives to young people who have been sexually exploited or who are vulnerable to this sort of abuse, this may also be relevant to the consideration of appropriate services under the GBV, DA, SV Bill.^{xiv}

2.3. **Domestic Abuse: Recovering Together (DART).** Services often focus on helping mothers to recover from domestic abuse and overlook the harm caused to their children. Mothers who have lived with a violent partner can often neglect their children’s physical and emotional needs. Children can find it hard to talk to their mums about what has happened.

2.3.1. NSPCC Cymru/Wales operates DART out of our Prestatyn Service Centre. DART works with children between seven and 11 years old and their mums. It is designed as a group work programme that runs for 10 weeks, with sessions lasting between two and two-and-a-half hours. Time is spent working with children and mothers separately, helping them to draw up a safety plan and cope with any difficult

behaviour in their children. We help children to understand what has happened and explore their feelings about it.^{xv}

2.3.2. DART has been evaluated over a three year period in eight sites across the UK.^{xvi} As part of a mixed-method evaluation, interviews were conducted with mothers and children following their attendance at DART. The findings were published in the journal *Child Care in Practice* in 2013.^{xvii} They include:

- Mothers and children interviewed were, on the whole, positive about DART and felt it had helped their recovery and relationship with one another.
- The interviews also enabled the identification of barriers and facilitators which affected the extent to which outcomes could be achieved.
- Elements that facilitated the programme included: activities that helped participants to deal with different feelings related to the abuse; sessions where mothers and children worked together, which helped to improve their relationship; and supportive staff and peers who enabled participants to feel less alone.

2.3.3. The final evaluation of DART is due to be published in Autumn 2014 and we will ensure that the Welsh Government and Committee Members receive a copy of the report and a briefing about the findings.

2.4. **Caring Dads: Safer Children (CDSC).** Is an evidence-based programme^{xviii} which protects children by working with fathers who have been violent towards their partners or ex-partners. It helps fathers recognise the impact their behaviour has on their children and improve their parenting. CDSC is currently operating out of our Cardiff and Prestatyn Service Centres.

2.4.1. Children can be deeply traumatised by witnessing violence between their parents or carers even if they do not suffer violence directly. Serious Case Reviews often highlight the need for a better understanding of the risks angry and violent dads can pose to children, particularly after parents separate.

2.4.2. All participants must be willing to change their behaviour. Convicted men normally must have undertaken a relevant course to address their violence before they join the programme.

2.4.3. CDSC is currently being evaluated by the NSPCC in five sites across the UK. Interim findings were published in January 2014.^{xix} Key findings include:

- Generally, fathers found being a parent less stressful and interacted better with their children after they had attended the programme
- Over a quarter of mothers had symptoms of depression at the beginning of the programme and one in six reported symptoms of anxiety. Depression and anxiety among mothers had reduced by the end of the programme.
- Surveys of children and partners post-programme suggest that CDSC can bring about meaningful improvements in fathers' behaviour that make families feel happier and safer.

Comments on the general principles of the Gender-based Violence, Domestic Abuse and Sexual

Violence (Wales) Bill and the need for legislation to improve the public sector response in Wales to domestic abuse, gender-based violence and sexual violence:

3 Definitions and Wording of the Bill

3.1. **Definition of Gender-based Violence:** NSPCC Cymru/Wales notes that a key area of discussion about the Bill has been the decision to use the term ‘Gender-based Violence’ in place of ‘Violence against Women’ which was the title of proposed legislation under the White Paper consultation. Welsh Government has stated that this wording has been adopted for legal reasons and to reflect the content of the Bill which aims to provide support for all victims. We note that the Explanatory Memorandum and draft guidance documentation supporting the Bill make clear statements acknowledging that women suffer disproportionately from this violence. We are aware of debates over the use of the Gender-based Violence terminology in the Bill. We would urge the Committee’s scrutiny process to seek assurance that whichever approach is used will not preclude the commissioning of specialist services to respond to the specific and complex needs of different groups and will not undermine action to tackle the unacceptably high prevalence of violence against women.

3.1.1. NSPCC Cymru/Wales welcomes the clear inclusion of Female Genital Mutilation (FGM) in the definition of Gender-based violence in the Bill and we are pleased that the Bill’s coverage of children will mean that it will capture the demographic that are most likely to be affected.^{xx} The NSPCC has been working to raise awareness and to improve the protection and support available to children at risk of or who have been victims of FGM in the UK. We operate a free 24-hour FGM helpline^{xxi} and are currently collating evidence through an NSPCC and Home Office FGM survey.^{xxii}

3.2. **Visibility of Children: UNCRC and Rights of Children and Young Person’s Measure.** NSPCC Cymru/Wales welcomed the commitment to the UNCRC within the White Paper. Whilst we welcome that the Children’s Rights Impact Assessment accompanying this Bill has been published (an analysis of the Bill against Articles 1,2,3,6,9,19,27,34 and 39) we are concerned that the supporting documentation and guidance to this Bill makes very little mention of children and where it does this is not with direct reference or does not make use of the UNCRC as a framework. Article 19 of the UNCRC states that

1. *States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent (s), legal guardian(s) or any other person who has care of the child.*
2. *Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and those who have the care of the child, as well as other forms of prevention, and for the identification, reporting, referral, investigation, treatment and follow up of instances of child maltreatment.*

NSPCC Cymru/Wales does not feel that currently the Bill provides sufficient detail about how the work of the Ministerial Advisor and national and local strategies will fulfil all aspects of Article 19 with regards to children and young people who experience domestic abuse and how it will include specific provisions for children as rights holders. The Social Services and Wellbeing (Wales) Act includes a provision that *'a person exercising functions under this Act in relation to a child' ...must have due regard to Part 1 of the United Nations Convention on the Rights of the Child'*. NSPCC Cymru/Wales therefore calls for a similar provision to be included in this Bill and that the UNCRC is used as a central framework of any statutory guidance issued under Section 12 of the Bill.

3.3. Definitions of 'Abuse' and 'Domestic Abuse'

3.3.1. NSPCC Cymru/Wales welcomes that the proposed definition does not mention a specific age range of 16 years or over, which is a feature of the current Home Office non-statutory definition. We welcome clarification in the supporting documentation that the Bill extends to all victims of gender-based violence, domestic abuse and sexual violence, including children. We endorse this acknowledgement of the growing evidence that children and young people are experiencing intimate partner violence in their own relationships. NSPCC Cymru/Wales however believes that, as set out in Section 3.2 the extension to cover children should be underpinned by a specific provision on due regard to the UNCRC and needs to include serious consideration of points made in sections 4 and 5 of this response.

3.3.2. NSPCC Cymru/Wales notes that the definitions enshrined in the Bill will become the standard definitions of GBV, DA and SV for Wales. NSPCC Cymru/Wales believes that definitions of domestic abuse are highly significant, as the majority of stakeholders working together to tackle this problem, undertake their work with reference to government definitions. We are aware that there are currently various different definitions in use across Welsh Government. We note that the current Home Office definition differs to the definition used in the Welsh Government Bill (particularly with regards to coercive control and age limits) and could be enshrined into legislation with the recent announcement of the Strengthening the Law on Domestic Abuse' consultation which proposes the creation of 'a specific offence of coercive control'. NSPCC Cymru/Wales feels that potential dissonance between the Home Office definition and the Welsh Government definition may undermine clarity for the different agencies involved especially due to the fact that policing and criminal justice are not devolved. Crucially, we believe definitions of domestic abuse must assist rather than hinder stakeholders in achieving their goal of the eradication of domestic abuse. We would therefore reiterate the importance of this opportunity to establish clear, robust and consistent definitions in line with internationally accepted standards.

3.4. NSPCC Cymru/Wales would like to see:

- **A clearer reference to children on the face of the Bill and under the Rights of Children and Young Persons (Wales) Measure a clearer analysis of measures from a UNCRC perspective throughout the supporting documentation and draft guidance underpinning the Bill.**
- **The inclusion of a provision requiring due regard to the UNCRC in the Bill and the use of the UNCRC as a central framework of any statutory guidance issued**

under Section 12 of the Bill.

- **Definitions of domestic abuse must assist rather than hinder stakeholders in achieving their goal of the eradication of domestic abuse. We would therefore reiterate the importance of this opportunity to establish clear, robust and consistent definitions in line with internationally accepted standards.**

4 Prevention of gender-based violence, domestic abuse and sexual violence

- 4.1. A primary aim of this Bill (as introduced) is stated to be '*to improve arrangements for the **prevention** of gender-based violence, domestic abuse and sexual violence*'. NSPCC Cymru/Wales was therefore concerned to see that White Paper proposals to ensure that compulsory education on 'healthy relationships' is delivered in all schools and to promote a whole school approach, are currently absent from the Bill.
- 4.2. NSPCC Cymru/Wales believes that the **compulsory and expertly delivered provision of healthy relationships education** underpinned by a **whole school approach for all children and in all schools in Wales** is fundamental and critical to the success of the aims of the Gender-based Violence, Domestic Abuse and Sexual Violence Bill.^{xxiii} Crucially, this should be taught from a perspective of gender equality and human rights. We welcome the statement on 9th July that consideration is being given to how further provisions would be included at Stage 2 or 3 of the Bill's scrutiny process.
- 4.3. NSPCC Cymru/Wales notes the ongoing Independent Review of Assessment and the National Curriculum Wales. We submitted a response to this consultation and made clear our position that we believe this opportunity should be taken to incorporate mandatory healthy relationships education as a core part of the PSE curriculum in Wales.^{xxiv} It is also NSPCC Cymru/Wales' view that this is an important opportunity for the PSE framework to be refreshed, and its content be made statutory^{xxv} to ensure greater consistency in key skills taught in different schools across Wales. This will be crucial to ensure adequate status, resource and prioritisation of healthy relationship education within the curriculum. In a separate paper submitted in collaboration with Barnardo's and Welsh Women's Aid we call for clarity, at Stage One of the scrutiny process, about how the commitment to compulsory and expertly delivered healthy relationships education will be delivered by Welsh Government.^{xxvi}
- 4.3.1. Sections 1.5 and 1.6 outlined evidence of the need to better recognise and address the fact that young people are at risk from domestic abuse in their own relationships. NSPCC Cymru/Wales sees this legislation as a key opportunity to do so. Furthermore we have highlighted growing evidence that patterns of sexual coercion and harassment are not confined to older teens but are also emerging in the everyday lives of pre-teen children. This is further corroborated by recent data from ChildLine filtered to capture those young people aged 16 and under:
- In 2012/13, ChildLine dealt with approximately 270,000 counselling sessions with children and young people of this age group.
 - Of those sessions, 10% overall stated that the call was about problems or concerns with a current or former partner.

- Depression and unhappiness was the main concern for children and young people aged 16 and under where the person of concern was a partner/ex (2,400 counselling sessions).^{xxvii}

4.3.2. It is therefore our view that ‘age appropriate’ education on healthy relationships, which focusses on tackling gender stereotypes and inequalities, is vital to ensure safer futures and well-being for young people. We believe that this cannot start early enough and we would like to see provision **start at primary level and run right through to secondary level in Wales.**^{xxviii} It is also important to note that there is currently no standardised PSE content that directly addresses primary-aged children’s experiences of negotiating sexism, sexual harassment and sexual violence within a gender equalities framework.

4.3.3. Moreover, recent studies have synthesised a range of international research demonstrating that embedding approaches, which focus on Social and Emotional Learning (SEL), can lead to significantly improved social and emotional skills, attitudes and behaviour, which in turn leads to improved academic performance with studies showing between 11-17-percentile-point gains in achievement.^{xxix} NSPCC is currently piloting an approach to ‘Keeping Safe’ messages in Northern Ireland.^{xxx}

4.4. **Whole School Approach:** These findings about the wide ranging benefits of a ‘wellbeing’ approach support NSPCC Cymru/Wales’ recommendation that provision should take place through a series of compulsory initiatives in schools to tackle the roots of domestic abuse and integrated with a **‘whole school approach to pupil wellbeing’** to provide better support for children and young people affected by such violence. Careful consideration also needs to be given to provision for children and young people outside of mainstream education.^{xxxi} NSPCC Cymru/Wales recommends:

- **Healthy relationship education delivered by practitioners with specific expertise in gender and equality issues, including violence against women and girls.**
- **An environment where children feel safe to discuss, share and disclose, taking an integrated approach that makes better use of existing opportunities within the school day.**
- **Relationship and sex education to be informed by children’s own experiences (“things that are going on for us”) and where children can learn from each other.**
- **Healthy relationship education to be developed with children and young people in a way that is relevant to their local community and experiences.**
- **A designated person with expertise for children to ‘talk to’ about gender and sexuality issues outside lessons.**
- **Robust training and clear guidance for professionals delivering healthy relationship education on dealing with disclosures.**
- **Sufficient school-based counselling services in primary and secondary schools**
- **Provision for children and young people outside school settings with a specific focus on vulnerable and hard to reach groups.**

4.4.1. NSPCC Cymru/Wales welcomed the vision and ethos underpinning the White Paper of building a society and culture in Wales built on a belief system where everyone has the right to live in a safe community, free from violence and abuse. We believe

that this will only be achieved by taking forward the whole range of education proposals set out in the White Paper. We believe that this integrated approach is crucial to instil the values and qualities in our children that will lay the foundations for future citizens of who will shape a society free from violence and abuse.

- 4.4.2. The series of calls (section 4.2) that would underpin a whole school approach would foster an environment supportive of ‘children’s wellbeing’, where children feel safe to discuss, share and disclose, in accordance with the UNCRC. We would urge that this is an approach that needs to be integrated into the school day and believe there are opportunities to make better use of existing opportunities within the school day (registration, circle time etc.) to create opportunities for children and young people to share issues that are concerning them. NSPCC Cymru/Wales would point out that a ‘whole school approach’ encompasses a range of measures that can be considered outside of the question of whether healthy relationships will form a mandatory part of compulsory PSE provision in schools in Wales. We note that under Para 59, Exp. Mem., the Welsh Government is considering ‘supporting measures to ensure schools embed actions on violence against women, domestic abuse and sexual violence more generally’. We would suggest that as part of this process there should be further consideration of a requirement on all schools and further education institutions to develop ‘whole school’ strategies alongside the development of Local Authority and Local Health Board Strategies (possibly in Guidance under section 12 of the Bill). We would also like to see further information about how this guidance/requirement would be monitored to ensure compliance in 100% of schools in Wales. We believe that implementing our call for a designated person ‘or champion’ in each school for children to talk to about gender and sexuality issues outside of lessons would support this process.
- 4.5. **Learning from Children:** We have already highlighted (Sections 1.5 and 1.6) a range of evidence that is increasingly showing that young people are at risk from abusive behaviour in their own relationships, demonstrating a clear need to ensure that young people are provided with the knowledge and tools to protect themselves from abusive behaviour.^{xxxii} The ‘Boys and Girls Speak Out’^{xxxiii} research project carried out on behalf of the National Assembly for Wales Cross Party Group on CSE, not only highlights a need for more recognition of ‘young person relationship abuse’ but underlines the importance of ensuring children’s own voices, views and experiences are able to shape future research, policy and practice in this area (Article 12, UNCRC).
- 4.5.1. A key finding from the ‘Boys and Girls Speak Out’ research highlighted the importance of ‘starting from where children are at’ in terms of their own experiences and their own relationships. Moreover NSPCC/ChildLine findings show that young people do not always feel engaged in PSE and would like to see improvements in the way that sexual and relationships education (SRE) is taught.^{xxxiv} It is important that children and young people are involved in the development of appropriate content.
- 4.6. **Expertly delivered provision:** A comprehensive programme of PSE education which addresses a range of issues, from equalities to bullying, exploring how these can impact on attitudes to violence in the home and in relationships and accompanied by a whole-school approach requires serious thought about who is best placed to deliver such a programme. NSPCC Cymru/Wales believes that schools will need support from a range of external agencies to deliver such a programme and to

address the range of complexities. It is also vital that a co-ordinated programme of education is provided across Wales.

- 4.7. **Robust training and clear guidance for professionals:** NSPCC Cymru/Wales has highlighted the need to ensure the provision of comprehensive VAW and equalities training for all related professionals and we welcome statements about the need to ensure that the people delivering healthy relationships education in our schools are appropriately trained to respond effectively to disclosures.^{xxxv} We welcome the development of a National Training Framework (NTF) for Wales and NSPCC Cymru/Wales is feeding in to its development through the Content Delivery Group. We would recommend that the National Training Framework should be closely coordinated with and aligned to eventual compulsory PSE provision and the embedding of a ‘whole school approaches’ in Wales. It is important that key actors in schools and further education institutions are included at the appropriate levels of the NTF and we would also suggest consideration of whether appropriate training could be integrated into initial professional training of key public service professionals such as police, health professionals and teacher training programmes, including the new Masters in Education Practice (MEP) programme.

4.9 NSPCC Cymru/Wales would like to see:

- **Clarity on how the commitment to compulsory and expertly delivered healthy relationships education will be delivered at Stage One of the National Assembly for Wales’ scrutiny process.**^{xxxvi}
- **Ensure that all elements of a whole school approach as outlined in section 4.4 are clearly included in guidance under section 12 of the Bill. Consideration of the feasibility of requiring all schools and further education institutions to develop ‘whole school’ strategies as part of this guidance. We would also like to see further information about how this guidance/requirement would be monitored to ensure compliance in 100% of schools in Wales.**
- **Healthy relationship education delivered by expert practitioners with specific expertise in gender and equality issues, including violence against women and girls. Robust training and clear guidance for professionals on VAW and dealing with disclosures.**
- **PSE content on healthy relationships/SRE to be informed by children’s own experiences and developed with children and young people in a way that is relevant to their local community and experiences.**

5 Improved Support/Protection for children and young people affected by gender-based violence domestic abuse and sexual violence

- 5.1. In our response to the White Paper consultation proposals, the NSPCC Cymru/Wales made clear our support for proposed measures including: the appointment of a Ministerial Advisor; the development of a National Training Framework; placing a duty on key public sector professionals to ‘ask and act’; placing a duty on relevant bodies to contribute to multi-agency fora; to improve information sharing and to place a duty on public sector employers to have a workplace policy for violence against women domestic abuse and sexual violence. We welcomed this basket of measures

as a coherent approach to improving the public sector response to all aspects of violence against women and to strengthen and better integrate services to ensure that they are consistent, effective and of a quality standard. As noted in section 3, we are pleased that the measures included in the Bill on this aspect will extend to children.

- 5.2. NSPCC Cymru/Wales notes the provision under the Bill that places a duty on Local Authorities and Local Health Boards to prepare a joint local strategy on Gender-based Violence, Domestic Abuse and Sexual Violence for their area, which will be reviewed annually.
- 5.3. NSPCC Cymru/Wales regrets that the duty on employers to implement a workplace policy and a National Training Framework will now be delivered outside of the Bill. NSPCC Cymru/Wales also notes that the detail of how public bodies will fulfil the new 'local strategy' duty under this Bill, particularly in regards to White Paper proposals of duties to 'ask and act' and to contribute to multi-agency fora, will be taken forward under Guidance. We note the draft Guidance published alongside the Bill and that this Guidance will be released for public consultation in due course and we look forward to the opportunity to comment in detail at this point.
- 5.4. Whilst we welcome the mention of 'public education, the Ask and Act process, training for staff and the sharing of information' as key areas that future statutory guidance **can** cover (Expl. Mem Para 31), we would welcome further assurance and detail that public authorities will be **required** to include **each one of these areas** in their local strategies. We would reiterate that measures related to children should be developed in accordance with the UNCRC.
- 5.5. Despite the welcome decision to include children within the scope of the legislation, NSPCC Cymru/Wales feels that the Bill and draft guidance fails to address the rights and needs of children who witness or experience domestic abuse *as individuals*, particularly in relation to services for children. We would like to see further detail on the provision of services to children, based on their own rights under the UNCRC.
- 5.6. The fragmented 'stop start' nature of services for children and families experiencing domestic abuse has been highlighted by recent research.^{xxxvii} NSPCC Cymru/Wales is however concerned that despite good intentions, it remains unclear how proposed approaches will work in practice. There is currently a severe lack of sufficient 'specific' provision for children, in accordance with Article 19 UNCRC, to match the evidence of need. Concerns have consistently been raised by stakeholders about the existing post-code lottery of services across Wales and we are concerned about the wide variation in expertise and capacity to provide the sorts of specialised services needed to provide adequate support to children. We would also express concern that the current balance between primary and secondary legislation in this Bill could lead to variance of services that risks undermining accountability. We would like to see a stronger emphasis on measures to improve the commissioning of services (particularly services to support children and young people) included in the Bill.
- 5.7. NSPCC Cymru/Wales was disappointed that the Welsh Government Independent Review of Violence against Women, Domestic Abuse and Sexual Violence services in Wales published in April 2014 omitted the consideration of services for children and young people from the study. We regret the missed opportunity to consider the services needed for children, in the mapping of the current landscape of service

provision of Wales. We would suggest that further work to map the provision of services for children in Wales should be carried out.

- 5.8. Sections 1.5 and 1.6 of our response emphasise the clear need to better understand and respond to the needs of young people who experience or use domestic abuse in their own relationships. Currently 'adult' programmes are often merely adapted to be 'delivered' for young people, rather than trying to understand how their relationships (and therefore the abusive behaviour) may need a different response. There is currently a lack of evidence-based services to serve children and young people and we believe that this needs to be addressed. It also remains the case that children are rarely given opportunities to express their views about what they feel is effective and become involved in decisions about the type of services needed.^{xxxviii}
- 5.9. In addition, historically, there has been a lack of co-ordination between legislation and policy to address domestic abuse and the approach to child protection with each set of responses operating in their own silos, creating a significant barrier to addressing family and intimate partner issues effectively. NSPCC Cymru/Wales would highlight that there remains significant work to be done in piloting and evaluating evidenced-based programmes and interventions to ensure that responses to the complex lives of children and young people are unified and not segmented. It is also vital that adequate funding is made available to support this. Resources such as the All Wales Child Protection Procedures Review Group practice guidance on 'Safeguarding Children and Young People affected by Domestic Violence' should be a key part of the development of services and should inform the development of training under the NTF.^{xxxix}
- 5.10. There is also no mention of perpetrator programmes in the supporting guidance to the Bill, NSPCC Cymru/Wales would underline the importance of early identification and interventions with perpetrators, as a key part of holistic approach to these issues. Our programme (Section 2.3) Caring Dads: Safer Children, while not a perpetrator programme, takes an alternative approach to addressing Domestic Abuse behaviours with fathers.
- 5.11. Sections 2.3 and 2.4 of this response highlight DART and CDSC, two NSPCC services that are currently being delivered across the UK, including in Wales, and are currently in the process of being evaluated. We highlight these services as the sorts of evidence-based programmes that should be considered as part of building better responses for children in Wales.
- 5.12. NSPCC Cymru/Wales notes the mentions throughout the draft Guidance accompanying the Bill to the All Wales Domestic Abuse and Sexual Violence Helpline. The NSPCC would suggest that the fact that the Bill covers children, means that it would also be important to signpost to the NSPCC helpline. We thought it may be helpful to provide suggested text for inclusion:

NSPCC deliver a range of pioneering evidence base therapeutic and protection services directly to children/young people and their families who have domestic abuse in their families. Our services include the 24/7 NSPCC Helpline for anyone concerned about the welfare of a child and we provide support for all children and young people through ChildLine via telephone, email or online, 24 hours a day/365 days a year.

- 5.13. We would also welcome clarity about how elements of the new ‘strategy duty’, including multi-agency fora, will align with current local mechanisms for planning and service delivery including the Local Service Board and the Single Integrated Plan. Recent changes to policy and legislation in Wales means that various multi-agency approaches to address family support have developed which encompass responses to domestic abuse, these include: Team around the Family, Families First Initiatives, Integrated Family Support Services. Furthermore these complement a series of initiatives including Flying Start and Communities First which are integral parts of the Welsh Government’s approach to tackling poverty (as these programmes support the demographic recognised to be at higher risk of domestic abuse, this often forms a core part of the work of interventions under these initiatives. It will be particularly important to provide practitioners and agencies with clarity given proposed changes to LSBs and SIPs under the forthcoming Wellbeing and Future Generations (Wales) Bill and the implementation of the recommendations of the Commission on Public Service Governance and Delivery.
- 5.14. NSPCC Cymru/Wales would welcome further detail about the accountability of new ‘local strategies’. NSPCC Cymru/Wales believes that to achieve the aim of a better co-ordinated approach, at a minimum, there should be a role for the Local Service Board in monitoring and evaluating the local strategies. It will also be crucial to ensure clear links with safeguarding and child protection strategies, policies, partners and procedures including SCBs and new SABs. We would like further information about how local strategies will be assessed and evaluated to ensure consistency and a common approach across Wales and further detail about how the Welsh Government will deal with non-compliance.
- 5.15. **Outcomes Framework:** NSPCC Cymru/Wales believes that a robust outcomes framework will be fundamental to the achievement of the aims of the Bill in order to provide agencies with common goals and to ensure better data collection, information and monitoring. In accordance with points made in Section 3.3 indicators developed need to be underpinned by the UNCRC. We would also urge that the indicators and outcomes measured as part of this Bill align with other Outcomes Frameworks being developed by Welsh Government, particularly under the Social Services and Wellbeing (Wales) Act, the Together for Mental Health outcomes and the joint Families First, Flying Start and Communities First outcomes.

5.16. **NSPCC Cymru/Wales would like to see:**

- **A more detailed consideration, underpinned by a specific provision, throughout the legislation and supporting guidance of the rights and needs of children under the UNCRC who witness or experience domestic abuse as *individual rights bearers*.**
- **Further funding, piloting and an extension of evidence-based programmes for dealing with the specific needs of children and young people who experience domestic abuse. This needs to pay particular attention to developing specific evidenced-based programmes (not just adaptations of adult programmes) that respond to the experiences of partner violence in children’s own relationships.**
- **Ensure that new multi-agency structures ask and act processes and the NTF complement existing frameworks, initiatives and programmes for supporting**

children and young people experiencing domestic abuse. There should also be clear links and communication channels with safeguarding and child protection strategies, policies, partners and procedures.

- **Clear accountability structures and a framework of robust outcome indicators aligned with the UNCRC that ensure that new local strategies are in synergy with existing initiatives at a local level to ensure the delivery of better services for children. Clear links with safeguarding and child protection strategies, policies, partners and procedures.**

6 Equal Protection

- 6.1. NSPCC Cymru/Wales is a member of the Children are Unbeatable! Cymru alliance which calls on Welsh Government to fulfil their commitment to the United Nations Convention on the Rights of the Child (in particular article 19) by removing the defence of “reasonable chastisement” under section 58 of the Children’s Act 2004.
- 6.2. NSPCC Cymru/Wales has consistently made clear its position that children need, deserve and have a right to equal protection from all forms of violence, under the United Nations Convention on the Rights of the Child. Arguments supporting the removal of the defence of “reasonable punishment” are set out in a range of CAU and NSPCC briefings on this subject and the First Minister and legal advisers have confirmed that Wales has the power to act.
- 6.3. The Rights of Children and Young Persons (Wales) Measure requires Ministers to have due regard to the CRC; now that Wales has the power to fulfil this clear requirement of the CRC. NSPCC Cymru/ Wales believes the Rights of Children and Young Persons (Wales) Measure places an obligation on the Welsh Government to close the rights violation represented by the defence of “reasonable chastisement” under section 58 of the Children’s Act 2004 at the earliest opportunity.
- 6.4. We believe that **both** the Gender-based Violence, Domestic Abuse and Sexual Violence Bill and removing the defence of “reasonable chastisement” under section 58 of the Children’s Act 2004 are important building blocks for a society where future generations can grow up free from violence and abuse.

6.5. NSPCC Cymru/Wales urges:

- **The Committee, in its Stage One report, to recommend that the Welsh Government utilises the legislative opportunity that this Bill presents to provide children with equal protection under the law on assault.**

Or

- **The Welsh Government to make clear during Stage One scrutiny how it will fulfil its duty under the Rights of Children and Young Persons (Wales) Measure to close this ongoing rights violation to protect children from harm and violence.**

Comments on any potential barriers to the implementation of provisions included in the Bill, and whether the Bill takes account of them.

- Section 5 made clear our view that any emerging structures must value existing local partnerships and frameworks for supporting children and young people who experience domestic abuse, particularly integration with existing safeguarding and child protection systems.
- Together with the new Social Services and Wellbeing Bill there will be a number of duties on well-being, child protection, protection of vulnerable adults and workforce development which will need careful planning and integration, monitoring and oversight which must not take place in isolation from each other.
- Learning from safeguarding and workforce development policies aimed at identifying and intervening earlier in cases of child neglect mean that we know that professionals need to be supported both in terms of developing awareness, expertise and skills and in having appropriate caseloads to enable them to have the time to fulfil their duties. Potential barriers include overloaded and under-resourced services as a result of increased disclosures and referrals. We have highlighted that the current lack of evidence-based provision to deal with the specific and complex nature of children's experiences of domestic abuse is a potentially significant barrier. The 'local strategy' duty must be underpinned by a focus on piloting and embedding new services and initiatives to ensure a co-ordinated response and to give frontline professionals the confidence that services will be there to support referrals.

Whether there are any unintended consequences arising from the Bill

- We have considerable concerns that the decision to omit the commitment made in the White Paper about the delivery of healthy relationships in all schools in Wales could undermine the achievement of the preventive agenda of the Bill.
- We are concerned that without focused attention and funding for the development of adequate and specialised services for children and young people, there will be challenges in effectively responding to increased referrals as a result of the Bill's coverage of children.
- Definitions must clarify and not complicate the work of practitioners and service providers.
- Local Strategies must also complement existing structures, frameworks and initiatives to support practitioners and stakeholders and not hinder them by adding complexity.

The Financial Implications of the Bill

- NSPCC Cymru/Wales believes funding for services which support children and families must be long-term and sustainable to avoid the uncertainty and impact on outcomes caused by short-term funding. Our recent 'How Safe Are our Children Report 2014 reported that expenditure for the main areas of public spending relating to child protection and safeguarding, levels in 2012/13 dropped back to 2006/07 levels and is forecast to fall further, this is set against a backdrop of an extraordinary increase in the demand for services.^{xi}
- We would like to see a strategic approach to funding to deliver improved services to support children who experience domestic abuse based on their own rights and needs, whether they remain at home or are forced to move to temporary accommodation. As highlighted in Section 5, there is a general gap in services to support children. The legislation must ensure the rights and needs of children who experience domestic abuse are met regardless of whether they remain in the family home or accompany a parent to refuge, or whether domestic abuse is presenting in their own relationships. Consistent funding must be applied to support this.

- Any consideration of the costs of implementing the legislation should also take into account the work of Sylvia Walby and analysis of the related costs at a Wales level, which emphasise the costs of failing to adequately address domestic abuse.^{xii}

ⁱ NSPCC Cymru/Wales Briefing (2010). *Domestic Abuse: A Child's Point of View*. Available at: https://www.nspcc.org.uk/.../DomesticAbuseBriefing_wdf63544.pdf NSPCC (2011). *Child Abuse and Neglect in the UK Today*. London: National Society for the Prevention of Cruelty to Children.

ⁱⁱ A range of evidence is synthesised in: McManus, E., Belton, E., Barnard, M., Cotmore, R., and Taylor, J., (2013). *Recovering from Domestic Abuse, Strengthening the Mother-Child Relationship: Mother's and Children's Perspectives of a New Intervention*. *Childcare in Practice*: 19:3, 291-310.

ⁱⁱⁱ Hester, M., Pearson, C. and Harwin, N. (2007). *Making an Impact: Children and Domestic Violence: A Reader, Second Edition. Chapter 3, p.63*. London: Jessica Kingsley Publishers.

^{iv} Holden, G.W. and Ritchie, K.L. (1991). *Linking extreme marital discord, child rearing, and child behaviour problems: evidence from battered women*. *Child Development* 62, 311-327.

^v Hester, M., Pearson, C. and Harwin, N. (2007). *Making an Impact: Children and Domestic Violence: A Reader, Second Edition. Chapter 3, p.63*. London: Jessica Kingsley Publishers.

^{vi} Radford, L. *et al.* (2011) as cited by Radford, L.; Aitken, R.; Miller, P.; Ellis, J.; Roberts, J. and Firkie, A. (2011) *Meeting the needs of children living with domestic violence in London*, London: NSPCC/Refuge.

^{vii} Brandon, M. (2009). *Understanding Serious Case Reviews and their Impact: A Biennial Analysis of Serious Case Reviews 2005-07*; Brandon, M., Bailey, S. and Belderson, P. (2010) *Building on the learning from serious case reviews: a two-year analysis of child protection database notifications 2007-2009*. London.

^{viii} Webster, A.; Coombe, A. and Stacey, L. (2002) *Bitter Legacy: The Emotional Effects of Domestic Violence on Children*,

London: Barnardo's. The research showed that in nine out of 10 cases of domestic violence, children were present in the next or same room.

^{ix} Ibid. Humphreys, C. (2006) *Domestic violence and child abuse. Research and Practice Briefing.No.14*, Department for Education and Skills. Stanley, N., Miller, P., Richardson, Foster, H., and Thomson, G. (2010). *Children's experiences of domestic violence: Developing an integrated response from police and Child Protection Services*. UCLAN/NSPCC. Available at:

http://www.nspcc.org.uk/Inform/research/findings/children_experiencing_domestic_violence_report_wdf70355.pdf; Kolbo, J.R., Blakeley, E.H., & Engelman, D. (1996), 'Children who witness domestic violence: A review of the empirical literature', *Journal of Interpersonal Violence*, vol.11, no.2; Morley, R., & Mullender, A. (1994) 'Domestic violence and children: what we know from research' in Mullender, A., & Morley, R. *Children living with domestic violence: putting men's abuse of women on the childcare agenda/*

^x Barter, C. McCarry, M., Berridge, D. and Evans K. (2009). *Partner Exploitation and violence in Teenage Intimate Relationships*, London, NSPCC and University of Bristol. Available at: http://www.nspcc.org.uk/Inform/research/findings/partner_exploitation_and_violence_summary_wdf68093.pdf/.

The report looked at 1,353 young people, between 13 and 17 years old from England, Scotland and Wales exploring their experiences of relationships and partner violence.

^{xi} Pelligrini, A. D. (2001) 'A Longitudinal Study of Heterosexual Relationships, Aggression, and Sexual Harassment during the Transition from Primary School through Middle School'. *Journal of Applied Developmental Psychology*, 22, (2): 119-133; Pelligrini, A. D. (2002) 'Bullying, Victimization, and Sexual Harassment During the Transition to Middle School'. *Educational Psychologist*, 37 (3): 151-163; Stein, N. (1996) 'Sexual Harassment in School: The Public Performance of Gendered Violence'. *Harvard Educational Review*, 65 (2): 145-162; Stein, N. (2007) "Locating a Secret Problem: Sexual Violence in Elementary and Secondary Schools." In L. O'Toole, J. R. Schiffman & M. L. Kitter Edwards (Eds.), *Gender Violence: Interdisciplinary Perspectives*, 2nd Edition. (pp. 323-332) New York and London: New York University Press; Stein, N. (2013) "Middle school sexual harassment, violence and social networks" Mumford, E., Okamoto, J., Taylor, B., and Stein, N., *American Journal of Health Behavior*, 37(6), 769-; Afra, A. (2013) *'Primary school sexualities. A critical social psychological foregrounding of children's constructions of "childhood sexuality"'*. Unpublished PhD thesis. Dublin: Trinity College; Gâdin, K. G. (2012) *Sexual Harassment of Girls in Elementary School: A Concealed Phenomenon Within a Heterosexual Romantic Discourse*, *Journal of Interpersonal Violence*, June, 27: pp. 1762-1779; Holford, N., Renold, E. and Huuki, T. (2013) 'What (Else) Can a Kiss Do?: Theorising the Power Plays in Young Children's Sexual Cultures'. *Sexualities*, 16 (5-6): 710-729.

^{xii} Renold, E (2012) *Boys and Girls Speak Out, a qualitative study of children's gender and sexual cultures*. Cardiff: Cardiff University, NSPCC & Office of the Children's Commissioner for Wales http://www.nspcc.org.uk/Inform/research/findings/boys-and-girls-speak-out_wda100425.html;

^{xiii} NSPCC Cymru/Wales runs service centres in Cardiff, Prestatyn and Swansea, which provide direct services to children and families across Wales. Details of the services provided by each centre are available at: http://www.nspcc.org.uk/what-we-do/NSPCC-in-your-area/cymru-wales/services/services-in-your-area_wda84178.html

^{xiv} For more information on the Protect and Respect Service see: http://www.nspcc.org.uk/what-we-do/the-work-we-do/priorities-and-programmes/sexual-abuse/protect-respect/protect-respect_wda93138.html

^{xv} The programme is based on research by Humphrey et al (2006) that demonstrated the benefits for children and mothers of talking to each other about the abuse. Humphreys, C., Mullender, A., Thiara, R., & Skamballis, A. (2006). *Talking to my Mum: Developing Communication Between Mothers and Children in the Aftermath of Domestic Violence*. Journal of Social Work, 6: 55-63. See also: Buckley, H., Holt, S. and Whelan, S. (2007). *Listen to Me! Children's Experiences of Domestic Violence*, Child Abuse Review.16:5, 296-213. Sabourin, S (2009). Early Exposure to Violence, Domestic Violence, Attachment Representations, and Marital Adjustment, Personal Relationships, 16:3. 65–384.

^{xvi} The NSPCC Evaluation Department has presented findings each year in an interim report, the Final Evaluation Report is due to be published in autumn 2014. Findings are currently being analysed. NSPCC Cymru/Wales will ensure that Welsh Government and the Communities, Equalities and Local Government Committee receive a copy and briefing on the findings.

^{xvii} McManus, E., Belton, E., Barnard, M., Cotmore, R., and Taylor, J., (2013). *Recovering from Domestic Abuse, Strengthening the Mother-Child Relationship: Mother's and Children's Perspectives of a New Intervention*. Childcare in Practice: 19:3, 291,310.

^{xviii} Scott, K. & Lishak, V. (2012). *Intervention for Maltreating Fathers: Statistically and Clinically Significant Change*. Child Abuse and Neglect, 36:9.

^{xix} The evaluation of CDSC compares fathers' behaviour towards their children and partners before and after the programme and assess the effects of any changes on their wellbeing. The evaluation did not include a comparison group, so further research is required to be confident that the improvements in outcomes are a direct result of fathers participating in the programme. For full interim findings see: McConnell, M. Barnard, M., Holdsworth, T. and Taylor, J. (2014). *Caring Dads: Safer Children. Interim Evaluation Report*. London: National Society for the Prevention of Cruelty to Children. Available at: http://www.nspcc.org.uk/Inform/research/findings/evaluation/caring-dads_wda101255.html

^{xx} FGM is usually carried out on girls between infancy and 15 years of age, with the majority of cases occurring between the 5 and 8 years of age (HM Government, 2011). Because of the hidden nature of the crime, it is difficult to estimate FGM's prevalence, but a study based on 2001 census data in England and Wales estimated that 23,000 girls under the age of 15 years could be at risk of FGM each year and nearly 66,000 women are living with its consequences (Dorkenoo et al, 2007). FGM could be even more prevalent than these figures suggest due to population growth and immigration from practicing countries since 2001 (HM Government, 2011) : http://www.nspcc.org.uk/Inform/resourcesforprofessionals/minorityethnic/female-genital-mutilation_wda96841.html

^{xxi} Anyone who is worried about a child being or has been a victim of FGM can contact **0800 028 3550** for information and support.

^{xxii} Survey available at: <http://www.homeofficesurveys.homeoffice.gov.uk/s/116305XBMTM>

^{xxiii} NSPCC Cymru/Wales set out its key calls in this area in its response to the White Paper Consultation on 'legislation end violence against women and domestic abuse (Wales) in February 2013 <http://www.nspcc.org.uk/Inform/policyandpublicaffairs/wales/wales-policywda92935.html> ; and similar calls were made as part of the Violence Against Women Action Group, of which we are a member <http://walesvawgroup.com>.

^{xxiv} Consultation on the Independent Review of Assessment and Curriculum: http://www.nspcc.org.uk/Inform/policyandpublicaffairs/wales/wales-policy_wda92935.html

^{xxv} PSE is currently not mandatory but left to the discretion of each individual school (Section 101 (1) of the Education Act 2002).

^{xxvi} NSPCC Cymru/Wales, Barnardos Cymru and Welsh Women's Aid have developed a joint briefing paper calling for clarity about how healthy relationships provision will be delivered

^{xxvii} Childline uses a wide variety of concern categories in which they use to reflect the issues children and young people are facing today. These concern categories are applied to counselling sessions in order to capture the concerns and issues that prompt children and young people to make use of the service. ChildLine has begun coding the calls about relationship abuse in a way to try to tease out the concerns of young people in a clearer way. ChildLine is therefore now coding and reporting on the emotions the young person is expressing to help us capture the impact on the young person. ChildLine Statistics: Overview of Main Concerns (2012/2013).

^{xxviii} Renold, E (2012) *Boys and Girls Speak Out, a qualitative study of children's gender and sexual cultures*. Cardiff: Cardiff University, NSPCC & Office of the Children's Commissioner for Wales. See also: Renold, E (2006). *'They Won't Let Us Play Unless you're Going Out with One of Them': Girls, Boys and Butler's 'heterosexual matrix' in the Primary Years*, British Journal of Sociology of Education; Renold, E. (2005). *Girls, Boys and Junior Sexualities: Exploring Children's Gender and Sexual Relations in the Primary School*. London: Routledge Falmer.

^{xxix} Durlak, J., Weissberg, R., Dymnicki, A., Taylor, R., Schellinger, K. (2011). *The Impact of Enhancing Student's Social and Emotional Learning: A Meta-Analysis of School-Based Universal Interventions*. *Child Development* 82:1, 405-432; Payton, J. Weissberg, R.P., Durlak, J.A., Dymnicki, A.B., Taylor, R.D., Schellinger, K.B., & Pachan, M. (2008). *The Positive Impact of Social and Emotional Learning for Kindergarten to Eighth Grade Students: Findings from Three Scientific Reviews*. Chicago, IL: Collaborative for Academic, Social and Emotional learning.

- ^{xxx} McElearney, A., Scott, J., Stephenson, P., Tracey, A., Corry, D. (2011). *Keeping Safe: The Views of Principals, Teachers and other School Staff in Relation to Teaching 'Keeping Safe' messages in Primary Schools In Northern Ireland*. Northern Ireland: National Society for the Prevention of Cruelty to Children.
- ^{xxxii} Wood, M., Barter, C., & Berridge, D. (2011). *Standing on my own two feet: disadvantaged teenagers, intimate partner violence and coercive control*. London: National Society for the Prevention of Cruelty to Children.
- ^{xxxiii} Holford, N., Renold, E., and Huuki, T., (2013). *What (Else) Can a Kiss Do?: Theorizing the Power Plays in Young Children's Sexual Cultures*. *Sexualities* 16(5-6) pp. 710–729. Ringrose, J. et al. (2012). A Qualitative Study of Children, Young People and "Sexting". London: National Society for the Protection of Children. Available at: http://www.nspcc.org.uk/Inform/resourcesforprofessionals/sexualabuse/sexting-research_wda89260.html
- ^{xxxiii} Renold, E (2012) *Boys and Girls Speak Out, a qualitative study of children's gender and sexual cultures*. Cardiff: Cardiff University, NSPCC & Office of the Children's Commissioner for Wales http://www.nspcc.org.uk/Inform/research/findings/boys-and-girls-speak-out_wda100425.html; The research involved 125 children and young people from five secondary schools and three primary schools in Wales. As part of the research, most children and young people reported struggling to live with gender stereotypes and "everyday sexism", and experiencing verbal sexual and gender-based harassment. This is supported by a series of recent studies showing that patterns of coercion, control, harassment and violence are not confined to adults and older teens; they are increasingly present in the lives of pre-teen children.
- ^{xxxiv} NSPCC (2014). *Written evidence to the Education Select Committee inquiry into Personal, Social, Health and Economic education (PSHE) and Sex and Relationships Education (SRE) in schools*.(June 2014). London: National Society for the Prevention of Cruelty to Children.
- ^{xxxv} National Assembly for Wales (2014). Statement: Introduction of the Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill, Minister for Local Government, Lesley Griffiths AM. Cardiff: The Record. Available at: http://www.assemblywales.org/docs/rop_xml/140701_plenary_bilingual.xml#157765
- ^{xxxvi} NSPCC Cymru/Wales, Barnardos Cymru and Welsh Women's Aid have developed a joint briefing paper calling for clarity about how healthy relationships provision will be delivered/
- ^{xxxvii} Thatcher, C. *You've Given Us a Voice Now Listen*. Cardiff: Welsh Women's Aid; Stanley, N. et al. (2010) *Children's experiences of domestic violence: Developing an integrated response from police and Child Protection Services*. UCLAN/NSPCC.
- ^{xxxviii} Radford, L., Aitkin, R., Miller, P., Ellis, J., Roberts, J., and Firkc, A. (2011). *Meeting the Needs of Children living with domestic abuse in London*. London: Refuge/NSPCC research project, Funded by the City Bridge Trust.
- ^{xxxix} All Wales Child Protection Procedures Review Group (2011). *All Wales Practice Guidance: Safeguarding Children and Young People Affected by Domestic Abuse*: <http://www.rctcbc.gov.uk/en/relateddocuments/publications/news/domestic-abuse-protocol---final-27-04-11---pdf.pdf>
- ^{xl} Jutte, S., Bentley, H., Miller, P., Jetha, N. (2014). *How Safe are Our Children?* London: National Society for the Prevention of Cruelty to Children. Available at: http://www.nspcc.org.uk/Inform/research/findings/how-safe/how-safe-2014_wda101852.html
- ^{xli} Robinson, A., Brisbane, A., Farrar, F., Hardy, P., Jones, B., Pickles, J., Shepherd, J. (2012). *The Welsh Government's proposed 'Ending Violence Against Women and Domestic Abuse (Wales) Bill': Recommendations from the Task and Finish Group*. Cardiff: Welsh Government. Available at: [http://www.cardiff.ac.uk/socsi/resources/Robinson%20et%20al%20\(2012\)%20Task%20and%20Finish%20Group%20Report.pdf](http://www.cardiff.ac.uk/socsi/resources/Robinson%20et%20al%20(2012)%20Task%20and%20Finish%20Group%20Report.pdf)