



**Rt Hon Alun Michael JP FRSA**

Police and Crime Commissioner for South Wales  
Comisiynydd yr Heddlu a Throseddu De Cymru



Christine Chapman AM  
Chair of the Communities, Equality and Local Government Committee  
National Assembly for Wales

*3rd October 2014*

*Dear Christine,*

I was very pleased to learn of the Minister's wish to strengthen the Bill that is currently before your committee with a specific section about Violence Against Women and Girls. I hope that it will now prove possible to move some of the language of the Bill - and in particular its title - closer to the language and aspirations set out in the White Paper.

It is sometimes said that the title of an Act is unimportant and that it is the contents that matter. There is some truth in that, but a title is also important to signal the intentions of Legislators and Ministers as that can "change the weather" in terms of public attitudes and understanding. That is what the title of the White Paper started to do in Wales and it will certainly influence thinking in the public domain – including how the police and other public services respond – if that message can be sent out loud and clear.

Having had my own experience over many years of trying to resolve such legislative issues, and to bring clear policy objectives within the constraints of legal drafting, I thought it might be helpful to commission an expert who until recently was one of the country's leading experts within the Office of the Parliamentary Counsel to consider options for strengthening the Bill. I was familiar with the work of Daniel Greenberg from my time as a Minister at Westminster. He is now in private practice and undertakes work in regard to Welsh legislative processes, although I was unaware of that when I approached him.

While I can see that simply calling the legislation "an Act to prevent violence against women" might be seen as too narrow, the current title is potentially confusing and possibly incorrect. Clarity is important to the police and to all the partners with whom they work. That is why I asked Daniel to offer advice on the title and on some other changes that might take the Bill closer to the intentions in the White Paper, which were widely applauded as putting Wales in the forefront of action on this issue.

His suggestion was a title that would provide the clear focus that was originally intended while also making it clear that ALL forms of domestic violence, sexual violence and violence within relationships are covered: "An Act of the National Assembly for Wales to make provision in relation to violence against women & other domestic and sexual abuse".

The reason that this is important from a policing point of view is clear when looking at the statistics and while it is my role as Commissioner to take the lead on matters like this, my view is supported by the operational experience and data of South Wales Police.



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The South Wales Police approach is that each act of violence by one person on another should be treated with seriousness that is proportionate to the circumstances – and this must apply to violence within an intimate relationship of any sort. But as was explained in our formal evidence to the committee, presented by Lian Penhale on Wednesday, there are three factors that make tackling violence against women and girls a significant priority for the police.

- The number of incidents is very high
- The extent of under-reporting is extremely high
- The risk of serious injury or death is disproportionately high

South Wales Police data give a very clear picture of the prevalence of domestic abuse and sexual violence and clearly demonstrate the disproportionate impact on women and girls. Our review found that both in scale and seriousness women were by far the biggest victims of domestic abuse sexual assault and honour-based violence recorded in South Wales.

- Domestic violence with injury - 82% of victims were women
- Serious sexual Assaults - 82% of victims were women
- Honour-based violence - 72% of victims were women

**It follows that there is a public policy imperative for the police and all other public bodies to tackle the scandal of violence against women and girls which historically has been higher in Wales than in some other parts of the UK.**

The attached document, which I hope will be of assistance to the Committee, also suggests improvements to deal with the vital concern about how these issues are dealt with within formal and informal educational settings, the way in which a duty might be placed on all public bodies – bearing mind the important role that NHS bodies and others could play – and other ways in which public opinion could be influenced as a result of this legislation.

If it would help to draft specific amendments to make the suggestions clearer I would be happy to do so but in the first place we thought that this illustrative way of presenting the suggestions would be more helpful.

*Yours ever*  
*Alun*