

PLVAW 32

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Wales Violence Against Women Action Group

Response from: Wales Violence Against Women Action Group

**Re: Meeting with Cabinet Secretary for Communities and Children, on 21 September 2016 and the Committee's Post Legislative Inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (the Act)**

I am writing to you as Chair of the Wales Violence Against Women Action Group (VAWAG), following a meeting of this Group on Friday 16 September, to advise the Committee about the concerns of the group in relation to the proposed refresh of the Violence Against Women Domestic Abuse and Sexual Violence Strategy, currently out for consultation and in response to the recent call for evidence for the Post Legislative Inquiry into the Act.

In relation to the questions set out in the terms of reference the VAWAG would like to raise the following points that should inform the committee's scrutiny. We would like you to raise these concerns with the Cabinet Secretary on Wednesday 21 September, and to take this feedback into account when as part of your post legislative scrutiny. I would welcome the opportunity to provide oral evidence to this Committee as part of this inquiry.

**To what extent is the approach to tackling violence against women, domestic abuse and sexual violence improving as a result of the obligations in the Act?**

Implementation of the Act is at early stages and only one piece of statutory guidance has been published. The VAWAG members felt that the refresh of the national violence against women, domestic abuse and sexual violence strategy is one of the key components of the Act that underpins all other developments. The strategy is due to be published by November 2016 and should provide strategic leadership for local areas in the development and delivery of local needs assessments, strategies and plans to achieve prevention, protection and support.

It is of concern to the Group, therefore, that the current draft strategy lacks substance and fails to acknowledge the disproportionate experiences and impact of abuse on women and children. The proposed priorities are narrow in scope and do not clearly align with the objectives and vision, and unfortunately it recreates a silo approach by only focussing on what one Welsh Government department can deliver, at a time when national, regional and local collaboration to end violence against women is essential.

Particular concerns expressed by VAWAG members include:

- The **definitions** used in the national strategy are highly problematic and potentially damaging to achieving effective prevention work in Wales. Definitions are vital because they will steer regional and local commissioning and monitoring, however the proposed definitions are not in line with the United Nations, international and UK recognised definitions of domestic abuse and violence against women. This is a backward step from the 6 year 'Right to be Safe' violence against women strategy in Wales (2010-2016), which included the internationally accepted definition of violence against women, which placed it clearly within an equality and human rights framework. Losing this approach in Wales places us out of step with the UK Government and other devolved nations (e.g. the Home Office Ending Violence Against Women and Girls Strategy 2016-2020). The VAWAG includes expert legal advisors on

violence against women, and we have offered to advise Welsh Government on the matter of the importance of adherence to international definitions, which we hope will be taken up.

- The Strategy lacks a **commitment to funding** for independent specialist services in the third sector, despite previous Ministerial commitments to ensure that a model is developed to provide long term sustainable funding for specialist services from 2017/18 to ensure the future of third sector specialist domestic abuse, sexual violence, and violence against women services in Wales. However there is no regard for how specialist third sector services should be sustained and developed. These services are vital to enable public services to deliver their statutory duties to prevent violence against women, and protect and support survivors e.g. under the National Training Framework and Ask and Act policy framework. Yet these services are severely depleted in terms of capacity and resources and several face closure next year if funding cuts continue. Again, by not investing in specialist third sector services nationally through the use of dedicated ring fenced funding sourced from across Government departments (like Scottish and Westminster Governments have done and as required by the Istanbul Convention), Wales risks falling out of step with the UK in sustaining its national network of specialist services.
- **Primary prevention** – a key statutory duty for public services, as introduced by the Act – remains weak in the strategy and simply focussed on raising awareness without including any evidence-based interventions that are known from research to contribute to the prevention of violence against women. We would like to see a range of prevention activities priorities over the life of the strategy (5 years) which are developed and monitored in the longer term. The specialist sector in Wales already undertakes prevention work and collaborative partnerships with specialist services would add value to the work of public services, and should be further explored.

The VAWAG membership is concerned there is no opportunity to contribute to the accompanying delivery plan, which we understand will be published along with the strategy on 6 November. The group holds significant expertise within its membership, and whilst some members have provided pre-consultative advice on the content of the strategy, this has not been incorporated. We again offer to provide a ‘task and finish group’ to improve the strategy to ensure it is the best it can be so that Wales continues to lead the way on violence against women prevention in the UK.

### **Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

The VAWAG welcomes the role of the National Adviser as a mechanism to provide leadership on violence against women in Wales and to advise the Minister and relevant authorities on the actions required. However at present it remains to be seen how independent and effective the role is. The VAWAG felt there was a lack of synergy with the role and the draft strategy. There is particular concern that the role lacks time and resources, currently it is a part time post with no budget or support to carry out the role to the full potential.

### **Conclusion**

In summary, the VAWAG would appreciate if a Committee member could ask the Cabinet Secretary **if the refreshed violence against women, domestic abuse and sexual violence strategy will:**

1. Recognise and adopt the internationally accepted definition of violence against women and the UK definition of domestic abuse, to ensure consistency in strategy, commissioning and monitoring developments in Wales?
2. Include a model for long term sustainable funding for the specialist violence against women, domestic abuse and sexual violence services in the third sector in Wales, building on recent announcements by DWP on the need for a new long term model for funding refuges?
3. Minimise silo working and encourage cross Government, national and local collaboration and commitments to invest in the prevention, protection and support of violence against women,

domestic abuse and sexual violence in Wales, working in partnership with specialist third sector services already working on prevention.

Yours sincerely

A handwritten signature in black ink that reads "Mutale,". The signature is written in a cursive, slightly slanted style.

Mutale Merrill OBE  
Chair, Wales Violence Against Women Action Group