

## Response to Welsh Government draft budget proposals for 2019 - 20

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<b>These are the views of:</b>	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

### 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).<sup>1</sup> 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 direct services including, for example, the Welsh Government funded Live Fear Free Helpline and a National Training Service partnership. . We are piloting the Survivors Empowering and Educating Services (SEEdS) project, which is empowering survivors of violence and abuse to collectively influence and inform improvements in public services and commissioning frameworks, and help change attitudes.

We also deliver the Wales National Quality Service Standards, 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/>)

#### 1. Introduction

Our response is based on consultation with our membership of specialist services from across Wales and with survivors of abuse through Welsh Women's Aid's SEEdS project (Survivors Empowering and Educating Services).



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**Summary of recommendations;**

1. Welsh Women's Aid backs the Housing Matters campaign, led by Cymorth Cymru and agrees with the proposal to split the proposed EIPS grant into two, with the housing related grants (Supporting People and Homelessness Prevention Grant) being ring-fenced for the housing costs in short term supported accommodation. This could utilise and strengthen Supporting People expertise, governance and commissioning structures.
2. Commit to retain the ring-fence for the VAWDASV grant as a minimum, whilst also ensuring through commissioning guidance that local authorities maximise their investment by pooling other resources to supplement this grant.
3. Welsh Government should consider 5 year cycles of funding to support sustainability and confirm core funding ahead of time to allow services to effectively plan ahead.
4. Ensure adequate provision for VAWDASV prevention initiatives to create more supportive, resilient communities that are knowledgeable about VAWDASV.
5. Enable the creation of spaces where people who experience abuse or violence can feel safe to access vital information and be directed to help when they need it the first time around.
6. Welsh Government to commit to a whole community, integrated response to prevention work.
7. Welsh Government support the implementation of the 'Change that Lasts' model to guide preventative spending for VAWDASV.
8. Welsh Women's Aid expects embedding a commitment to funding to end the postcode lottery of funding for prevention work.
9. Welsh Women's Aid strongly recommends that the budget prioritises the sustainability of the independent third sector (as well as the public sector), especially small specialist providers such as VAWDASV services.
10. Investment should be targeted at systems change and transformation, as well as public service innovation.
11. The Welsh Government to ensure cross-departmental budgets support delivery of multi-agency statutory guidance that delivers systems-change and 'Change that Lasts'.
12. Further commitment to the Ask and Act framework to be prioritised including funding to support specialist services involved in delivery and support.
13. The Welsh Government utilises some of its budget to mitigate the impact of welfare reform on vulnerable people in Wales, including those experiencing VAWDASV.
14. The Welsh Government establishes a national fund to meet the needs of survivors (or for services to access) who have no recourse to public funds, to have equal access to protection, safety and support.
15. As part of its commitment to a feminist government, commit to ring-fenced, cross governmental national and local sustainable funding to specialist VAWDASV services so no-one is turned away.



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16. Welsh Government to allocate funds to support the specialist VAWDASV sector to mitigate the impact of Brexit.
17. Welsh Government to seek clarity from UK Government on access to funds for EU nationals.
18. Welsh Government to ensure that the Well-being of Future Generations (Wales) Act 2015 positively influences policy making around VAWDASV by providing leadership and guidance with clear expectations of quality standards required regionally and locally, including engagement with the local specialist sector to help guide evidence based and appropriate policy making for each area.

## 2. What in your opinion has been the impact of the Welsh Government's 2018-19 budget?

2.1 Welsh Women's Aid recognises that the Welsh Government allocated £5.4 million in 2017-18 for violence against women, domestic abuse and sexual violence. This included the funding for local authorities and third sector organisations to support the implementation of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. We also welcomed that the Welsh Government did not include the VAWDASV grant as part the pooled Early Intervention and Prevention budget in the flexible pathfinder areas in 2018-19.

2.2 Welsh Women's Aid welcomes the commitment from Welsh Government to deliver sustainable funding for VAWDASV specialist services across Wales, as outlined in the National VAWDASV Strategy 2016-21. To inform delivery of this guarantee of sustainable funding, Welsh Women's Aid produced the 'Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales' in September 2017. We consulted the majority of specialist VAWDASV services in Wales on their current and future funding, and collaborated to provide eight recommendations for the Welsh Government to inform the development and delivery



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**Summary of Recommendations:**

1. Sustainable' should mean longer term funding;
2. The model for sustainable funding should be applied to 'VAWDASV specialist services' as defined by the sector in Wales (definition included in the report);
3. Ensure an element of national funding is retained;
4. Ring fenced funding and diversity of funding streams that address the full range of needs of survivors of VAWDASV and invest in earlier intervention and prevention alongside crisis support and emergency provision;
5. Funding is supported by good, collaborative, and integrated commissioning practices;
6. Commissioners across Wales should have training/workshops on the VAWDASV commissioning guidance;
7. The impacts of changes in commissioning practices should be monitored;
8. A national fund be established to meet the needs of survivors (or for services to access) who have no recourse to public funds, to have equal access to protection, safety and support.

of sustainable funding and effective commissioning. These are outlined in summary, in the table below:

2.3 Unfortunately the 2018-19 budget only delivered further short-term annual funding, which in many areas led to services being insecurely funded, creating further uncertainty for future delivery and associated problems with service development and retention of expertise. This has been exacerbated by the 'Flexible Funding Programme' proposals and development of the Early Intervention and Prevention Support Grant. The proposal is already having an impact on specialist VAWDASV services and commissioning decisions. Welsh Women's Aid members in the seven pathfinder pilot areas are already raising concerns about the implications of removing the ring-fence for Supporting People grant and amalgamating it with a broad range of other funding. Many of the services involved in the pathfinder area will not be subject to competitive commissioning processes during the pilot period so the evaluation currently being carried out will not provide a true picture of the impact, nor will we know what risks services and service-users face as a result of the loss of ring-fence until it is too late.

2.4 Welsh Women's Aid is also aware of local authorities already beginning to consider the reduction of refuge provision due to the uncertainty of Supporting People funding. This does not impact on spending for this financial year but it is also clear that the impact of the budget is still in its early stages and will have implications beyond 2018-19.



2.5 There is also evidence of a continued post-code lottery in the funding of service across Wales, with some services unable to offer a dedicated children's worker. Welsh Women's Aid is currently mapping the provision of dedicated children's workers across Wales and has found inconsistency in funding of services. This inconsistency has resulted in significant gaps in provision; for example some areas have funding for direct school work while others do not and many are understaffed.

2.10 The commitment to sustainable funding for VAWDASV specialist services has been reiterated in the Cross Government VAWDASV Delivery Framework published in July 2018. Welsh Women's Aid would urge that sustainable funding for specialist VAWDASV services is enabled by future Welsh Government in line with the recommendations above.

### 3. What expectations do you have of the 2019-20 draft budget proposals?

3.1 The VAWDASV sector in Wales continues to face uncertainty caused by year on year funding and whether local commissioners prioritise local specialist services. In order to allow services the space to adequately plan ahead, Welsh Women's Aid would recommend that the Welsh Government take on board the recommendations set out above including at least 5 year cycles of funding for sustainability.

3.2 Welsh Women's Aid has grave concerns about the proposed merger of Welsh Government programmes to create a new Early Intervention: Prevention and Support Grant from 2019-20 and its likely impact on violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales. We are concerned the EIPs Grant will impact negatively on VAWDASV spending and add to the 'post code' lottery of services at a local level. The proposal gives no guarantee that funding for VAWDASV specialist services will be protected.

3.3 Firstly the loss of ring fencing of the Supporting People funding presents significant risk to the network or refuge and accommodation provision for those experiencing VAWDASV. Supporting People is the largest single funding stream that contributes to the delivery of VAWDASV specialist services in Wales. It is incredibly important to many specialist VAWDASV organisations and survivors across Wales. Our national analysis in 2017 indicated that 43% of funding going in to VAWDASV specialist services in 2017 came from the Supporting People Programme.

3.4 Evidence from England indicates that any loosening or removal of the ring-fence can have a devastating impact on *Supporting People* services. The Auditor General found an average cut of 45% across England in the four years that followed the removal of the ring-fence, with reports of 80% cuts in some areas. For example, since the removal of the *Supporting People* ring-fence, between 2010 and 2014 England lost 17% of specialist refuges and a third of all referrals to refuges were turned away,



due to a lack of available space.<sup>1</sup> specialist services that support survivors of sexual violence and specialist services led by and for BME women are particularly at risk,<sup>2</sup> with reports in November 2017 suggesting that council spending on domestic violence refuges across 33 local authorities in one region of England has fallen by up to 75% since 2010.

Evidence shows that

3.5 Welsh Women's Aid supports the Housing Matters campaign, led by Cymorth Cymru and agrees with the proposal to split the proposed EIPS grant into two, with the housing related grants (Supporting People and Homelessness Prevention Grant) being ring-fenced for the housing costs in short term supported accommodation. This could utilise and strengthen SP expertise, governance and commissioning structures.

3.6 It has also been suggested that in 2019-20, the local authority element of the VAWDASV grant (£2.4 million) will also be integrated into the new EIPS grant, even though it is not one of the ten<sup>3</sup> listed to be included during the pilot pathfinder phase. The Government's budget forecast<sup>4</sup> suggests the merging of VAWDASV local authority grants into the new EIPS grant, which will in effect mean the loss of ring-fence for future VAWDASV funding to local areas. Again, the VAWDASV sector has grave concerns about this proposed loss of ring-fence of the VAWDASV grant to local authorities from April 2019. We would like to think that greater flexibility to fund VAWDASV work from a range of grants would lead to an increase in investment in the sector, to deliver on the commitment in the Wales Strategy to ensure sustainable funding for VAWDASV specialist services. However, our experience to date suggests otherwise.

3.7 The Audit General's Office for Wales report in August 2017 on the responses from a range of public bodies on current delivery arrangements, financial and service risks following the VAWDASV (Wales) Act 2015 noted that many public bodies (namely local authorities) were unable to clearly attribute all spending on VAWDASV. They reported that reinforced the importance of local VAWDASV strategies and delivery plans being clearly aligned to funding for these policy areas. They particularly noted the disconnect between short-term annual grant funding and longer term priorities of strategies.<sup>5</sup> We also know many Public Service Boards failed to adequately prioritise VAWDASV in their community Well-Being plans, which suggests that several authorities do not adequately prioritise VAWDASV, its prevention and provision of support.

<sup>1</sup> <https://www.womensaid.org.uk/what-we-do/campaigning-and-influencing/campaign-with-us/sos/>.

<sup>2</sup> <https://zine.imkaan.org.uk/new-report-life-saving-black-women-s-groups-in-critical-state-facing-closure-government-must-e3eb904bf8e0>.

<sup>3</sup> *Supporting People, Flying Start, Families First, Legacy Fund, Promoting Positive Engagement for Young People, Childcare and Play (formerly Out of School Childcare), Homelessness Prevention, Rent Smart Wales Enforcement (formerly Independent Living), St David's Day Fund, Communities for Work Plus (formerly the Employability Grant).*

<sup>4</sup> <https://beta.gov.wales/welsh-government-budgets#to2019>

<sup>5</sup> <http://www.audit.wales/system/files/publications/Call-For-Evidence-Women-2017-English.pdf>



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3.8 From our own analysis of funding going into VAWDASV specialist services across the country, there was a reduction in funding for VAWDASV specialist services across Wales of 5% between 2016-17 and 2017-18. In 2016-17, the grants from local authorities amounted to 9.84% of the total resources going in to VAWDASV specialist services in the third sector in Wales; this reduced to 7.72% for 2017/2018, which is of concern given the anticipated increase in referrals from public services over the next five years. This was subject to significant local variation: one specialist service provided funding information going back to 2013 demonstrating a reduction of 40% in council funding for their service between 2013/14 and 2017/18, whilst experiencing a 78% increase in demand.

3.9 Losing the ring-fence for the VAWDASV grant to local authorities at a time when delivery of the Act and National Strategy commitments to 2021 is critically important - in addition to the loss of *Supporting People* - will likely mean that VAWDASV grants will be re-allocated to other issues and further reduction in funding to the specialist sector.

3.10 This evidence clearly demonstrates the need to identify a distinct VAWDASV grant so that funding can be effectively matched to longer term VAWDASV strategy commitments.

**Recommendations;**

1. Welsh Women's Aid backs the Housing Matters campaign, led by Cymorth Cymru and agrees with the proposal to split the proposed EIPS grant into two, with the housing related grants (Supporting People and Homelessness Prevention Grant) being ring-fenced for the housing costs in short term supported accommodation. This could utilise and strengthen SP expertise, governance and commissioning structures.
2. Commit to retain the ring-fence for the VAWDASV grant as a minimum, whilst also ensuring through commissioning guidance that local authorities maximise their investment by pooling other resources to supplement this grant.
3. Welsh Government should consider 5 year cycles of funding to support sustainability and confirm core funding ahead of time to allow services to effectively plan ahead.

**4. How financially prepared is your organisation for the 2019-20 financial year, and how robust is your ability to plan for future years?**

4.1 Funding pressure on specialist services remains and the impact of the proposed lifting of the ring-fence on housing related support could add further pressure. Services across Wales have reported a concern about funding and how this impacts on worker's time;

*"We have never been fully funded and rely on other sources of income which we have to generate... The main issue that small specialist organisations face is that small staff teams are placed under*

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*pressure utilising a percentage of their precious time looking and applying for funding instead of concentrating on the delivering and improving service provision.” – WWA Membership organisation*

4.2 Welsh Women’s Aid regularly consults with our members via our Funding Task and Finish Group. This offers all members an opportunity to raise relevant funding-related challenges and opportunities facing the specialist VAWDASV sector in Wales. Feedback from our members has highlighted that many currently have uncertain or unconfirmed funding beyond this current financial year. Additionally, early findings from Welsh Women’s Aid next State of the Sector report indicates services are reporting concerns about increased waiting times for people accessing their services because of the impact of funding cuts. The sector expects to see an increase in referrals as public services improve their identification of survivors via Ask and Act. Therefore there is a need to invest now into our national network of VAWDASV specialist services in Wales.

4.3 Our previous years mapping exercises have highlighted that some services had no confirmed funding for the following year at the point of responding and were relying solely on donations for continuance. This year early evidence from our members suggests some services are in the similar situations of uncertainty about future funding but with the additional concerns of the loss of ring fencing of funding that will increase competition with generic provision.

4.5 In terms of specialist services supporting survivors of sexual abuse, Welsh Women’s Aid research found sexual violence services faced the largest overall reduction in funding during the last two financial years of 20.2%<sup>6</sup>. While this is a reduction from UK Government, this shortfall has not been met by Welsh Government and Welsh Women’s Aid are concerned that funding for sexual violence services haven’t been fully embedded into budgeting across funding streams. One service noted;

*‘There has been no increase from UK government funding streams which are the same as previous years. We are also funded by our local health board, there has been no increase and has remained the same for many years. We previously were contracted for three years, however this year we have only been allocated one year, this is a concern for our organisation and service provision. We have had an increase in funding received from the Police and Crime Commissioners office.’ Welsh Women’s Aid member organisation.*

4.6 Recommissioning for the Rape Support Fund from the Ministry of Justice for sexual violence services will go out this autumn and currently it is unclear what services in Wales will get. Welsh Women’s Aid would urge Welsh Government to work with the Ministry of Justice and Police and Crime Commissioners to ensure sustainable provision of sexual violence services in Wales.

<sup>6</sup> Welsh Women’s Aid, ‘Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales’, Welsh Women’s Aid, 2017



4.7 National funding from the Welsh Government is also uncertain and organisations that are funded nationally do not have secure funding beyond March 2019. This funding is awarded on a year on year basis causing similar problems in planning long or medium term impact. The Welsh Government has a cross departmental National VAWDASV Strategy and Delivery Framework that commits to achieve objectives until 2021; to do this it should outline cross departmental budgetary commitment beyond to match this ambition for the length of the strategy.

4.8 Nationally, the following should be contributed to by funding which secures core provision and delivery, and this should be contributed to from across Welsh Government departments, and national oversight retained to ensure sufficient resourcing of critical national services and functions:

- The VAWDASV umbrella organisation to continue to be able to support, collaborate and deliver integrated services with specialist services across Wales around sustainability and skills development, quality assurance frameworks, evidencing impact, promoting consistency and providing services with a voice nationally.
- Organisations that deliver support at a regional or national level by and for Black and minority communities are supported to continue delivering to meet the needs of Black and minority survivors in every region/locality across Wales. There is a risk that because commissioners fail to identify the needs and experiences of survivors from Black and minority ethnic communities in different regions. While provision should be funded nationally, the importance of long term sustainability also needs to be recognised locally.
- National Helplines for survivors of VAWDASV, in line with Istanbul Convention.
- Organisations that deliver sexual violence specialist support services locally, regionally or nationally are supported to continue delivering to meet the needs of survivors.

National oversight should also be retained of sufficient resourcing into the national network of refuges, which should be resourced from a combination of national and regional funds to ensure local commissioning inconsistencies does not impact on the availability and capacity of this national and UK network. Careful consideration also needs to be given to how rental incomes for refuge services can be funded appropriately, given the potential loss of income though welfare reform being proposed by the UK Government.



***The committee would like to focus on a number of specific areas in the scrutiny of the budget, do you have any specific comments on any of the areas identified below?***

## **5 Approach to preventative spending and how is this represented in resource allocation**

5.1 Welsh Women's Aid welcomes the Welsh Governments commitment to preventative work, however is concerned this has not been fully embedded in budgetary decision making yet, particularly within local authorities. Of course, we recognise there are competing budget priorities, particularly pressure across public services for elderly care. However, the case for early intervention and prevention is clear. Too often support has not been available until abuse reaches crisis point, whereas preventative work can step in at a much earlier point and stop escalation, work to stop the irreversible impact of living with long-term abuse on children and ultimately save spending pressure on the public purse.<sup>7</sup> Delivery of sustainable funding, as discussed earlier in this response, should also work towards an effective prevention model as well as ensuring the maintenance of a network of life saving support services. While, over time, prevention work can ease demand on other services, funding for the lifesaving, crisis intervention work provided by the specialist VAWDASV specialist sector must continue.

5.2 A whole coordinated response to prevention is essential. We need policy makers to commit to prioritising prevention across departmental budgetary decision making, including allocating resources towards the prevention of VAWDASV in housing, health, education, safeguarding, criminal justice and community safety, local government and finance as these departments will financially benefit from a preventative approach to tackling VAWDASV.

5.3 Local commissioners need to commit to prioritising and recognising the importance of spending on prevention work to bring an end to the 'postcode lottery' of early intervention and prevention programmes available across Wales. In our report to the National Task and Finish group, it was identified that South Wales saw an increase of 71% during 2017/18 while Dyfed Powys only saw 4.5%.

5.4 There are examples of good practice around prevention work from across Wales, for example the Identification and Referral to Improve Safety (IRIS) project launch in South Wales<sup>8</sup> by the South Wales PCC and Cardiff and the Vale University Health board, as well as awareness raising campaigns, community projects, education interventions and work with children and young people to mitigate the impact of trauma. However in order for prevention work to be truly effective, there needs to be consistency in delivery and approach and sustainable funding to ensure prevention is an integral part of the response to VAWDASV. There is a need for other health boards in Wales to also commit to investing in similar projects that will enable a consistency in the delivery of early intervention across Wales, rather than pockets of promising practice. Compared with other services in the UK, VAWDASV

<sup>7</sup> <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/Sarah-WEB.gif>

<sup>8</sup> <http://commissioner.south-wales.police.uk/en/police-crime-plan/violence-women-girls/iris-identification-and-referral-to-improve-safety/>



specialist services in Wales do not benefit from health service/health commissioner investment nationally or regionally, despite their core business having a positive impact on health and well-being of adults and children who face adverse experiences in childhood or as adults. Welsh Women's Aid found in our report to the National Task and Finish group that funding from regional health boards remains low with only 0.28% of all funding for 2017/18. It is recommended that funding requirements for VAWDASV services should come from a combination of sources across sectors/funding streams. It should include a combination of national, regional/local investment including Health Boards, amongst others.

5.5 Welsh Women's Aid has expanded its 'Change that lasts' pilot model to Cardiff. Part of the model, known as 'Ask Me' has already been operating in Powys and will be rolled out to other area of Wales over the coming months. It is an early intervention programme that aims to ensure wherever women disclose abuse, they get the right support, first time. Crucial to the model is the role of 'Ask Me' Ambassadors, members of the community who will be upskilled in their response to abuse and be able to spot the signs at an earlier stage. The 'Change that Lasts' principles and the approach that underpins the model have been developed in partnership between Welsh Women's Aid and Women's Aid England, and further developed to better address the risks posed by perpetrators with Respect.<sup>9</sup> The model in Cardiff is currently funded by the Home Office Transformation Fund with the South Wales PCC. While the other pilots are funded by the Tampon Tax. While this prevention and early intervention system change is impacting on devolved and non-devolved aspects, investment is not being made by devolved public bodies or Welsh Government. Investment by devolved public bodies on prevention and early intervention remains significantly low despite aspects of the work falling under devolved responsibility.

**Recommendation:**

4. Ensure adequate provision for VAWDASV prevention initiatives to create more supportive, resilient communities that are knowledgeable about VAWDASV.
5. Enable the creation of spaces where people who experience abuse or violence can feel safe to access vital information and be directed to help when they need it the first time around.
6. Welsh Government to commit to a whole community, integrated response to prevention work
7. Welsh Government support the implementation of the 'Change that Lasts' model to guide preventative spending for VAWDASV.
8. Welsh Women's Aid expects embedding a commitment to funding to end the postcode lottery of funding for prevention work to be part of the budget.

<sup>9</sup> <http://www.welshwomensaid.org.uk/what-we-do/our-approach-change-that-lasts/>.



## 6 Sustainability of public services, innovation and service transformation

6.1 The ongoing impact of austerity measures on statutory provision from the public sector also has an impact on VAWDASV specialist services. Mental health, substance use and sexual health services are facing cuts which means the specialist sector is picking up survivors with additional multiple support needs. Sadly many services do not have the sufficient resources/capacity to deliver the level of sustained intensive support needed.

6.2 As stated, the loss of public services could see an increase in survivors accessing services who are experiencing multiple disadvantages. It is vital that public services such as mental health provision are not lost, and that VAWDASV expertise is also protected, so that survivors' needs can be appropriately addressed through holistic provision that can meet multiple needs.

6.3 The value of partnerships with specialist independent providers of VAWDASV services is not recognised in many local authorities. Our State of the Sector Report in 2017 found that in some areas of Wales, there had been a move to more generic commissioning of services, which can come at the expense of local specialist services and risks the loss of decades of specialist experience.

6.4 Ultimately systems change is needed to transform responses to domestic abuse. Welsh Women's Aid has been piloting the 'Change that last's model as an example of systems change, where survivors and perpetrators are responded to and communities are upskilled to spot the signs earlier, respond appropriately and signpost people to access specialist support. To support a systems-change approach that transforms services we recommend that the Welsh Government should ensure cross-departmental budgets support delivery of multi-agency statutory guidance that delivers systems-change and 'Change that Lasts'; prioritising needs-led strengths-based delivery that places survivors of abuse at the centre of any intervention.

6.5 Welsh Women's Aid welcomes Welsh Governments commitment to the Ask and Act framework. However further funding is needed to ensure this is done effectively. Specialist services are rightly involved in delivery of the training, however, members have informed us that the funding only covers the costs of delivering training, often at below market rate, with no funding allocating for preparation of materials. Additionally, capacity is tested through increased demand on local services because of the training and again there is no additional funding to support this. Welsh Government should also ensure public sector agencies have the capacity to fully commit to training.



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**Recommendations:**

- 9 Welsh Women's Aid strongly recommends that the budget prioritises the sustainability of the independent third sector (as well as the public sector), especially small specialist providers such as VAWDASV services.
- 10 Investment should be targeted at systems change and transformation, as well as public service innovation.
- 11 The Welsh Government to ensure cross-departmental budgets support delivery of multi-agency statutory guidance that delivers systems-change and 'Change that Lasts'.
- 12 Further commitment to the Ask and Act framework to be prioritised including funding to support specialist services involved in delivery and support.

**7. Welsh Government policies to promote economic growth, reduce poverty, gender inequality and mitigate welfare reform.**

7.1 The Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 and commitment from Welsh Government to be a feminist government are important steps towards achieving gender and intersectional equality. However, the Act must be backed up with sustainable funding at local and regional levels, including robust commissioning and local strategy guidance. Furthermore, the plans for the EIPS Grant risks undermining commitments to tackling VAWDASV by seriously putting at risk specialist support for survivors of violence and abuse.

7.2 Welsh Women's Aid is concerned about the impact of universal credit and how this can enable economic abuse, with payments going to one member of the household. Without recourse to funds, it becomes even harder for women to leave an abusive partner. While the UK Government has pointed out that abuse support teams are in every jobcentre, this still relies on women being able to and wanting to disclose the abuse and request the payment is split, which further puts them at risk. Welsh Women's Aid would therefore back calls for payments to be split automatically. The UK Government Work and Pensions Committee have recently produced a report confirming the concerns of the sector and warns that single household payments of Universal Credit could put claimants at risk of harm.<sup>10</sup> Welsh Women's Aid appreciates Welsh Government currently has no control over universal credit payments, but would urge them to help mitigate the impact on those surviving economic abuse in Wales.

7.3 Welsh Women's Aid welcomes the UK Government decision to retain housing benefit for refugees and other supported housing, and calls for a parallel commitment to safeguard support funding for

<sup>10</sup> <https://publications.parliament.uk/pa/cm201719/cmselect/cmworpen/1166/116603.htm>



specialist services in Wales. However, remains concerned that the use of housing benefit to fund refuge spaces still creates a barrier for women who work or have no recourse to public funds.

- Recommendations**
- 13. The Welsh Government utilises some of its budget to mitigate the impact of welfare reform on vulnerable people in Wales, including those experiencing VAWDASV.
  - 14. The Welsh Government establishes a national fund to meet the needs of survivors (or for services to access) who have no recourse to public funds, to have equal access to protection, safety and support.
  - 15. As part of its commitment to a feminist government, commit to ring-fenced, cross governmental national and local sustainable funding to specialist services so no-one is turned away.

## 8. The Welsh Government’s planning and preparedness for Brexit

8.1 Uncertainty around Brexit continues as well as concerns about the effects that withdrawal will have on vulnerable people in Wales. Welsh Women’s Aid is concerned about the loss of EU funding and how this will impact the sector, as both EU funded projects are discontinued and VAWDASV services no longer have access to potential EU funding streams. Welsh Women’s Aid understands there is a planned EU Transition Fund and is keen to know how this, or any fund, will be used to mitigate the impact on women and VAWDASV services.

8.2 Welsh Women’s Aid also fears there will be an increase in women with no recourse to public funds and therefore will struggle to access services, such as refuge. The Welsh Government needs to plan to ensure that Brexit does not lead to further barriers to anyone experiencing VAWDASV in accessing lifesaving support.

- Recommendations:**
- 16. Welsh Government to allocate funds to support the specialist VAWDASV sector to mitigate the impact of Brexit.
  - 17. Welsh Government to seek clarity from UK Government on access to funds for EU nationals.



## 9. How the Welsh Government should use taxation and borrowing powers, particularly in relation to the Welsh Rate of Income Tax

9.1 With the ability to set Welsh rates of income tax from April 2019, Welsh Women's Aid calls for an increased commitment by the Welsh Government to invest in provisions for prevention and support for survivors of VAWDASV, including children and young people, recognising the £303.5 million<sup>11</sup> cost of domestic abuse in Wales every year and £8.5 billion cost of sexual violence to society across England and Wales.

9.2 As new taxation power comes to Wales, these losses will have an adverse effect on the amount of income tax the Welsh Government can reinvest. This highlights the importance of early intervention and prevention, as the societal knock-on effects are wide-reaching.

## 10. How evidence is driving Welsh Government priority setting and budget allocations

10.1 The Change that Lasts model has been supported by Welsh Government as a model for early intervention and prevention, based on years of working with survivors and evidence of research. Welsh Women's Aid would advocate for funding to be allocated on an evidence based model. The model recognises survivors with multiple support needs, including those related to age and life experience, and aims to maximise specialist services ability to respond to those individual needs.

10.2 As referenced in this response, Welsh Women's Aid prepared 'Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales' for Welsh Government to inform delivering the guarantee of sustainable funding for VAWDASV specialist services in Wales in order to present the funding situation for specialist services and recommendations for delivering sustainable funding. We would recommend that this is utilised to inform the budgetary planning to ensure sustainable funding for VAWDASV specialist services.

### Recommendation:

18. Welsh Government to use recommendations from Welsh Women's Aid 'Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales'.

<sup>11</sup> <http://www.senedd.assembly.wales/documents/s70635/ELGC5-01-18%20Paper%2016.pdf>



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**Llinell Gymorth Byw Heb Ofn**  
 Darparu gwybodaeth a chelwogaeth cyfrinachol ynghylch trais domestig, trais rhywiol a trais yn erbyn merched yng Nghymru



  
**Cymorth i Ferched Cymru**  
**Welsh Women's Aid**  
 Rhoi Merched a Phlant yn Gyntaf  
 Putting Women & Children First

## 11. The Welsh Government policies to strengthen the economy and promote innovation

11.1 Tackling VAWDASV will support Welsh Government policies to strengthen the economy. VAWDASV not only cost the economy through police, health and housing costs, but through lost work. Either victim/survivors having to take time off due to the consequences of violence, moving away for safety/into refuge and having to give up work or being prevented from working by the perpetrator. A prosperous economy therefore needs to see VAWDASV effectively tackled. Welsh Government should place responsibilities on employers to mitigate the impact of VAWDASV.

11.2 Without sustainable core models of working, which have proven success rates in supporting people experiencing VAWDASV, we cannot have innovation. It is essential commissioners ensure that models work, based on evidence, rather than funding innovative models for the sake of innovation. 'Change that Lasts' is an example of an innovative way of working, but keeping established and proven service delivery at its core.

## 12. How the Future Generations Act is influencing policy making

12.1 As part of a review of 19 Public Service Boards well-being assessments<sup>12</sup> Welsh Women's Aid was concerned to find poor quality in relation to VAWDASV. The development of this happened separately to the work on VAWDASV local strategies, which may well have led to this gap.

12.2 The Wellbeing of Future Generations (Wales) Act 2015, aims to improve the social, economic, environmental and cultural well-being of Wales. Proper investment into specialist services across Wales would help ensure many of the Act's 'Wellbeing Goals' for a more prosperous Wales, a Wales of cohesive communities, and a healthier, more equal Wales.

12.3 Early intervention and prevention work for violence against women, including domestic abuse and sexual violence at local, regional and national level has the potential to make a huge difference to the prosperity and success of Wales in the decades to come. Budgeting for future funding must also include VAWDASV to ensure this.

### Recommendation:

19. Welsh Government to ensure that the Well-being of Future Generations (Wales) Act 2015 positively influences policy making around VAWDASV by providing leadership and guidance with clear expectations of quality standards required regionally and locally, including engagement with the local specialist sector to help guide evidence based and appropriate policy making for each area.

<sup>12</sup> See link for access to all 19 documents: <http://gov.wales/topics/improvingservices/public-services-boards/?lang=en>



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Darparu gwybodaeth a chefnogaeth  
cynharuol ynghylch trais domestig,  
trais rhywiol a trais yn erbyn merched  
yn Nghymru



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Welsh Women's Aid

Rhoi Merched a Phlant yn Gyntaf  
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Welsh Women's Aid would like to thank the Finance Committee for the opportunity to provide evidence on this important inquiry. We would also be happy to provide the committee with further oral or written evidence, if required.

Any comments or questions regarding our response can be directed to:

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<sup>i</sup> Our membership of third sector violence against women, domestic abuse and sexual violence specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated includes: Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Clwyd Alyn Housing Association (CAHA) Women's Aid, Stepping Stones, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU), Gorwel (Grwp Cynefin), Montgomeryshire Family Crisis Centre, Newport Women's Aid, North Denbighshire Domestic Abuse Service, Port Talbot & Afan Women's Aid, RCT Women's Aid, Safer Wales (including Dyn Project), Swansea Women's Aid, Threshold, West Wales Domestic Abuse Service and Rape and Sexual Abuse Support Centre (RASASC) North Wales.

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