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Llinell Gymorth Byw Heb Ofn

Providing confidential support and information on domestic abuse, sexual violence and violence against women in Wales. Dwyer gyswrtwrth a chyswrtwrth cyswrtwrth ynghyd â ddiwrthwrth byw heb ofn i ferched a phlant yn Cymru.



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These are the views of:	<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).¹ 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

¹ Our membership of 22 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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collectively influence and inform improvements in public services and commissioning frameworks, and help change attitudes.

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

Welsh Women's Aid response to Welsh Government Draft Budget Proposals

1. What, in your opinion, has been the impact of the Welsh Government's 2019-20 budget?

As we highlighted in our 2018-19 response, despite a commitment in the Welsh Government National VAWDASV Strategy 2016-21 to sustainably fund specialist VAWDASV services, we have continued to see only further short-term annual funding. Welsh Government has committed to reviewing funding for the sector, but at the time of writing, we are still unclear about what this looks like. Many VAWDASV services in Wales have reported that they continue to find it impossible to adequately plan for the future due to their reliance on annual local authority funding and additional short-term grants. Specialist VAWDASV services across Wales are attempting to recover from years of insecure and unstable funding, with some facing year-on-year funding cuts.

We remain uncertain about Welsh Government's commitment to ensuring the Housing Support Grant and Children and Communities grant supports VAWDASV provision, despite VAWDASV cutting across all areas these grants will cover. It is particularly concerning as the outcomes framework for the grants does not include any VAWDASV specific goals. The lack of ringfencing or inclusion in the outcomes framework for VAWDASV provides increased flexibility for local authorities, who may not prioritise spending on specialist services.

We also remain unclear about whether Supporting People funding is in fact considered public funding and whether or not it can be utilised to support women with no recourse to public funds attempting to access refuge. We have continued to see a lack of resources available to enable the specialist VAWDASV sector to support women with an insecure immigration status. While we appreciate decisions on welfare are made at a UK level, we are clear Welsh



Government must do more, within the powers it has, to support survivors with no recourse to public, particularly given their commitment to becoming a Nation of Sanctuary for refugees and asylum seekers.

The continued 'post code' lottery of services for children across Wales is a major concern for Welsh Women's Aid and this is linked to the ongoing lack of action around the intent of sustainable funding from Welsh Government. Welsh Women's Aid has been working on a business model which includes costings for specialist children's workers in Wales to highlight where more funding is needed to ensure provision meets need across Wales.

Also aligned with sustainable funding is the continued focus on crisis work across the sector; more funding is needed to ensure a provision of preventative and early intervention work is available across Wales to reach survivors at an earlier point. However, this cannot be at the cost of crisis intervention work. The Change That Last's Model from Welsh Women's Aid is a good practice example of how the community can support an earlier intervention².

In terms of commissioning of services, Welsh Women's Aid welcomed the Violence against Women, Domestic Abuse and Sexual Violence Commissioning Guidance³ from Welsh Government, particularly the inclusion of our definition of specialist services. However local procurement procedures, in some areas, continue to insist that services go out to tender, putting local specialist services at risk and under pressure. There is still work to be done in terms of commissioners' understanding of the requirements under the new commissioning guidance. Linked to this, in the last year a Welsh Women's Aid member merged with another organisation, this decision was made to ensure provision of service continued for survivors and it may have resulted in a better format for commissioners, but put at risk the loss of local, specialist knowledge.

2. What expectations do you have of the 2020-21 draft budget proposals? How financially prepared is your organisation for the 2020-21 financial year, and how robust is your ability to plan for future years?

The VAWDASV sector continues to face uncertainty because of a lack of secure and sustainable funding. Specialist by and for BAME services, services for women with complex and multiple needs and sexual violence services remain particularly at risk. Our State of the Sector report found sexual violence services faced the largest overall reduction in funding

² <https://www.welshwomensaid.org.uk/what-we-do/change-that-lasts/>

³ <https://gov.wales/sites/default/files/publications/2019-05/statutory-guidance-for-the-commissioning-of-vawdasv-services-in-wales.pdf>



during the last two financial years of 20.2%. Sustainable should mean longer term funding and sustainability should be applied to specialist services. This should include at least five year cycles of funding.

Linked to this is the postcode lottery of provision for children's workers, with some services (for example) still unable to offer a dedicated children's worker. The importance of spending on prevention and early intervention work needs to be embedded in budgetary decisions, particularly within local authorities, a coordinated, integrated and 'whole community' response to prevention is essential.

Women fleeing abuse with no recourse to public funds are at particular risk as they cannot access lifesaving provision from refuge. We would expect to see a commitment from Welsh Government to do more to support this cohort of women and urge Welsh Government to clarify if Supporting People can be used for this cohort.

We are concerned about the impact of Brexit on survivors and the services there to support them; the Brexit process is likely to result in an increase in women whose rights may become restricted or removed, as EU women's status in the UK changes post-Brexit. This is coupled with the lack of access to support already for women with NRPF. In addition, services are likely to experience increased energy prices and possible increases in demand, particularly in deprived and rural areas, where job losses are likely to be higher, impacting survivor's financial status and therefore their reliance on services for support. We therefore urge Welsh Government to put plans in place to ensure that regardless of what form Brexit takes, there are no further barriers to anyone experiencing VAWDASV in accessing lifesaving support.

We also remain concerned about the impact of universal credit and how this can enable economic abuse. Without recourse to funds, it becomes even harder for women to leave an abusive partner. While benefit payments are decided at a UK level, we again urge Welsh Government to do more to mitigate the impact of economic abuse on survivors in Wales.

Finally, as stated, we remain concerned about the lack of a VAWDASV specific outcome for each goal in the Housing Support Grant and Children and Communities Grant. We urge Welsh Government to include a distinct VAWDASV outcomes for each goal in the outcomes framework for the grant, in line with the outcome aim of a more equal Wales within the Future Generations Act.

3. 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?

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- Approach to preventative spending and how is this represented in resource allocation (Preventative spending = spending which focuses on preventing problems and eases future demand on services by intervening early), particularly in relation to the financing of local health boards and health and social care services

Spending on prevention work remains low despite the policy intent of the VAWDASV (Wales) Act 2015. From a violence against women and girls perspective, more resources are needed in work to raise awareness and understanding of the early warning signs of violence and abuse. In addition, prevention work should include early intervention work both with survivors and children who are experiencing the 'early signs' of violence and abuse but that also targets perpetrators showing signs of abusive behaviour, before escalation starts.

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.⁴ 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 sector must continue.

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.

- Sustainability of public services, innovation and service transformation

Welsh Government has again named health as a priority spending area, but acknowledges that continued austerity measures at a UK level will impact on other public service areas. Welsh Women's Aid appreciates the important role of good healthcare, but would call for increased spending in areas which impact health, such as VAWDASV. The cost to healthcare of responding to VAWDASV is high⁵ and if resources were allocated to prevent or meet needs

⁴ <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/Sarah-WEB.gif>

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/772180/horr107.pdf



of survivors at a much earlier stage, the current resources used to treat it could be reprioritised to other areas.

Cuts to other public services continues to have an impact on the specialist VAWDASV sector, particularly in terms of cuts to mental health, substance use and sexual health services which puts added pressure on already stretched specialist services. Sadly, many services do not have the sufficient resources/capacity to deliver the level of sustained intensive support needed. These cuts to services will be compounded by the impact of Brexit, and concerns remain about how Wales can plan spending on public services while Brexit uncertainty continues.

Welsh Women's Aid's 'Change That Last's model is 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.

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 or backfilling of roles taken out to deliver the training. 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.

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

In our response to Welsh Government's consultation on Measuring a Nation's Progress for the Wellbeing of Future Generations Act, we pointed out that women are more likely to live in poverty and that poverty acts as barrier for women moving on from abuse and violence. In turn, the impact on mental health of living with abuse can make it harder to gain employment. We argued, therefore, that Welsh Government must do more, within its powers at a devolved level, to work to eradicate the drivers of poverty, such as VAWDASV and economic abuse in particular.



VAWDASV can prevent women achieving an equal economic footing with men, without work to eradicate it, it will be difficult to successfully achieve gender equality. Aspects of UK Government's benefit system are undermining progress towards equality, we appreciate this is not devolved but reiterate that Welsh Government must do more to mitigate the impact of these policies, particularly the universal credit single payment which provides an opportunity for perpetrators to misuse benefits to further isolate and control survivors through economic abuse. At our recent Cheques and Balances Event, participants found that women have borne the brunt of austerity measures particularly through welfare reform and the roll out of universal credit. Finances continue to be gendered and men who control women can exploit this to their benefit, the use of economic abuse is linked to women's lesser economic status, therefore any work to reduce poverty, gender inequality and the impact of welfare reform must consider economic abuse as a factor in maintaining financial inequality.

- The Welsh Government's planning and preparedness for Brexit

Despite calls from the Welsh Government, no additional resources have been announced to help Wales prepare for the impact of a potential No Deal Brexit and details on the Shared Prosperity Fund are also unclear.

Any outcome from Brexit is likely to negatively impact VAWDASV in Wales. We are concerned about both access to future EU funding streams and the loss of funding for projects already in receipt of EU support. We are concerned about an increase in women who may not have access to public funds, particularly in the event of a no-deal Brexit and for women who fail to, are unable to or deliberately prevented from accessing the EU Settlement Scheme, particularly for women subject to coercive control, who's evidence is not available or controlled by the perpetrator.

Women experiencing violence and abuse who have an insecure immigration status or whose status is dependent on their partner face additional barriers to help seeking when attempting to exit. This approach is being aided by the hostile environment that many migrant women have reported frequently experiencing in immigration checks with healthcare, housing and education services. This cohort of women also face barriers to accessing protection, support and specialist services, because of a lack of funding within the sector. Welsh Women's Aid are concerned that this situation will worsen post-Brexit, as potentially more women will face losing their rights to public resources.

Whatever the outcome of Brexit, it will detrimentally and disproportionately affect women, which in turn will mean a negative impact on survivors of VAWDASV. Both, women living in



poverty and the already overstretched services which they may come to rely on will be particularly impacted by increasing energy and food costs. We urge Welsh Government to continue to press UK Government for clarity and assurances on the Shared Prosperity Fund and the assurances that Wales ‘would not lose a penny’ in the event of Brexit.

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

In our response last year, we called for an increased commitment from Welsh Government to use the Welsh rate of income tax to invest in prevention and support for survivors and children/young people. Despite a policy intent to increase prevention work, we are yet to see this on the ground, despite the cost of domestic abuse in Wales being £66 billion⁶ for England and Wales. This highlights the importance of early intervention and prevention, as the societal knock-on effects are wide-reaching.

- How evidence is driving Welsh Government priority setting and budget allocations

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. Despite Welsh Government advocating for this model, current funding for the pilot in South Wales, which incorporates all aspects of the model, Ask Me, Trusted Professional and early intervention work with perpetrators, is funded by the Home Office Transformation Fund. 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.

- The Welsh Government policies to strengthen the economy and promote innovation

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. In addition, we know that ACEs are felt across the life course and many of these are particularly experienced by children living in abusive households. The long-term impact of these on physical and mental health can therefore impact on job prospects

⁶https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/772180/horr107.pdf



and in turn the economy. A prosperous economy therefore needs to see VAWDASV effectively tackled. Welsh Government should place responsibilities on employers and those working with children to mitigate the impact of VAWDASV.

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.

- How the Future Generations Act is influencing policy making

In our response to Welsh Government's consultation earlier in the year on 'Measuring a Nations Progress' we argued that it was important for VAWDASV to be specifically named and weaved into the criterion for the wellbeing indicators, as VAWDASV impacts across many policy areas. We would call for closer alignment of this Act with the VAWDASV Act and are concerned that due to the gaps in the Wellbeing of Future Generations Act, it is not being fully considered.

Proper investment into specialist services across Wales would also help ensure many of the Act's 'Wellbeing Goals' are met, for a more prosperous Wales, a Wales of cohesive communities, and a healthier, more equal Wales.

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.