

# Agenda – Equality, Local Government and Communities Committee

Meeting Venue:

Committee Room 1 – Senedd

Meeting date: Wednesday, 23

November 2016

Meeting time: 09.00

For further information contact:

Jon Antoniazzi

Committee Clerk

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## Informal pre-meeting (9.00 – 9.15)

1 Introductions, apologies, substitutions and declarations of interest

2 Scrutiny of the Public Services Ombudsman for Wales Annual Report 2015–16

(09:15–10:15)

(Pages 1 – 12)

Nick Bennett, Public Services Ombudsman for Wales

Chris Vinestock, Chief Operating Officer

Susan Hudson, Policy & Communications Manager

[Annual report 2015–16](#)

3 Papers to note

Correspondence from the Chair of Finance Committee in relation to Public Services Ombudsman for Wales: Estimate of Income and Expenses 2017–18

(Pages 13 – 14)



**Correspondence from the Dyfed–Powys Police and Crime Commissioner in relation to the post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015**

(Pages 15 – 16)

**Correspondence from the Office of the Police and Crime Commissioner North Wales in relation to the post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015**

(Pages 17 – 19)

**Correspondence from the Chair to the Cabinet Secretary for Communities and Children in relation to the post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015**

(Pages 20 – 21)

**Correspondence from the Cabinet Secretary for Communities and Children to the Chair in relation to the post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015**

(Pages 22 – 23)

**Correspondence from Both Parents Matter in relation to the post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015**

(Pages 24 – 26)

**Correspondence from Welsh Women's Aid in relation to the post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015**

(Pages 27 – 31)

**4 Motion under Standing Order 17.42 to resolve to exclude the public for the remainder of the meeting**

**5 Scrutiny of the Public Services Ombudsman for Wales Annual Report 2015–16 – Consideration of evidence**

(10.15 – 10.30)

**6 Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 – Consideration of draft report**

(10.30 – 11.30)

Document is Restricted

**John Griffiths AM**

Chair of the Equalities, Local Government and  
Communities Committee

**Dai Lloyd AM**

Chair of the Health, Social Care and Sport Committee

10 November 2016

Dear John and Dai,

**PUBLIC SERVICES OMBUDSMAN FOR WALES: ESTIMATE OF INCOME AND  
EXPENSES 2017-18**

On the 5 October 2016, the Finance Committee considered the Public Services Ombudsman for Wales's estimate for 2017-18.

During the evidence session, we learnt that the number of health complaints received by the Ombudsman continued to rise by 4 per cent last year. Of the 662 Local Health Boards/NHS Trust complaints in the past year:

- Five section 16 reports were upheld;
- 102 reports were upheld in whole or in part; and
- 113 complaints reached an early resolution.<sup>1</sup>

The Committee welcomes the increase in the number of early resolutions and the positive impact this has had on reducing costs for the Ombudsman. We also recognise the need to ensure that a robust system is in place to hold public bodies in Wales to account. However, Members are concerned by the growing number of health complaints and the administrative burden this is placing on the NHS, given that the majority of complaints are not upheld.

<sup>1</sup> Record of Proceedings, 5 October 2016, Paragraphs 66-71



As you will be aware, the Finance Committee's responsibilities are limited to considering the Ombudsman's use of resources, or expenditure from the Welsh Consolidated Fund. Therefore, we wanted to draw our concerns to the attention of both of your Committees. We wondered whether this is an area that the Equality, Local Government and Communities Committee can explore further when it considers the Ombudsman's Annual Report 2015-16, or the Health, Social Care and Sport Committee may wish to consider why there are increasing numbers of complaints within the Health Service in Wales

The Finance Committee will include the following conclusion in its report on the Ombudsman's estimate for 2017-18:

*As a result of the Committee's role being limited to scrutinising the Ombudsman's estimate only, the Chair has written to the Equality, Local Government and Communities Committee and the Health, Social Care and Sport Committee to raise its concerns regarding levels of health complaints.*

The Finance Committee's report will be laid before the Assembly by 22 November 2016.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Simon Thomas', written in a cursive style.

Simon Thomas  
Chair



# Agenda Item 3.2

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau

Equality, Local Government and Communities Committee

ELGC(5)-11-16 Papur 2 / Paper 2



**COMISIYNYDD  
HEDDLU A THROSEDDU  
DYFED-POWYS  
POLICE AND CRIME  
COMMISSIONER**

**Dafydd Llywelyn**  
Police and Crime Commissioner  
Police & Crime Commissioner's Office  
PO Box 99  
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T: 01267 226440  
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01 November 2016

Dear John

### **Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV)**

In response to your request for information regarding the above agenda, it is one that impacts upon all partner organisations and the communities we serve and is vital that we address, both as individual organisations and collaboratively. I believe that the VAWDASV Act, passed in April 2015, provides the opportunity for a truly collaborative approach with a joint strategic focus amongst partners resulting in consistent and comprehensive service delivery.

I am currently in the process of drafting my new Police and Crime Plan, within which the identification and support for victims of violence against women, domestic abuse and sexual violence will certainly feature. It is addressed within the Protecting Vulnerable People priority contained within the existing Plan which I inherited upon my election.

I currently commission services for victims of both domestic abuse and sexual violence, including the provision of 3 Sexual Abuse Referral Centres across the Force area. These provide the facility for forensic medical examinations and also ensure ongoing counselling and support through the criminal justice system for both adult and child victims. The service I commission from Hafan Cymru provides Independent Domestic Violence Advisors and I have recently increased the resource provided via this service. I am aware that we still have some distance to travel in order to provide sufficient service capacity to meet the ever increasing level of need as evidenced by our numbers of MARAC referrals. However, I am committed to working with partners to ensure that this vital aspect of victim support is appropriately addressed.

I recognise that crisis support is only one aspect of service delivery within this agenda and that preventing escalation of our low risk incidents is as crucial as supporting those already identified as high risk. I am fully committed to the prevention agenda across all areas of crime and policing and this will form a significant strand within my new Police and Crime Plan as well as being factored into future budget planning.

I recently convened a meeting of key representatives from across the Dyfed Powys region to consolidate our proposed way forward on the VAWDASV agenda and to identify the joint finance and resources that we are able to commit to this area of work. The outcome of this was a commitment to a joint regional needs analysis, development of a regional VAWDASV strategy and ultimately the joint commissioning of services. This will provide a consistent and equitable service provision for victims whilst ensuring that we secure the most cost effective service and maximise the capacity for front line delivery.

I hope the above information will be of assistance to the Committee. Please do not hesitate to contact me should you require any further information.

Yours sincerely,

**Dafydd Llywelyn**  
Police and Crime Commissioner



# Agenda Item 3.3

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau

Equality, Local Government and Communities Committee

ELGC(5)-11-16 Papur 3 / Paper 3

John Griffiths AM  
Cadeirydd/chair  
Equality, Local Government and Communities  
Committee  
National Assembly for Wales  
Cardiff Bay  
CF99 1NA

Ein Cyf / Our Ref: AJ/AMJ/1343

25 October 2016

Dear Mr Griffiths

Thank you for your letter of 27<sup>th</sup> September 2016 regarding your post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

I consider that the forward work plan for me and my fellow Commissioners to be our respective Police and Crime Plans. I will be publishing my first plan by March 2017.

The current plan, which was written by my predecessor, Mr Winston Roddick, identified violence against women, domestic abuse and sexual violence as priorities. These priorities are also reflected in the victims services, commissioned for 2016/17 and include the commissioning of IDVA's, ISVA's and the Victims Help Centre.

Whilst the new plan will be informed by public consultation and both local and national strategic assessments, there is nothing to suggest at this stage that violence against women, domestic abuse and sexual violence will not remain a priority for 2017/18 and beyond.

Since being elected as Police and Crime Commissioner for North Wales, I have been impressed by the improvement in services to victims, but, in the future there will also be a greater focus on the perpetrator of such offences. We are currently working closely with the management of HMP Berwyn around perpetrator intervention programmes for the men who will be housed within Berwyn.

The Committee may also be interested to learn of the Victims Help Centre and the specialist support afforded to victims of crime in North Wales. If the chair or any members of the committee wishes to visit North Wales we would be delighted to highlight to them the work undertaken within the Victims Help Centre. It would also provide an opportunity for the

committee to learn of the current issues facing service providers. Having met with local service providers on many occasions I am concerned that the focus on domestic violence, for all the right reasons, can be to the detriment of sexual violence as the capacity simply isn't there.

I would also be delighted to come and give a presentation to the Committee if they so wish.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Arfon Jones', followed by a period.

Arfon Jones  
Police and Crime Commissioner

# Agenda Item 3.4

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau

Equality, Local Government and Communities Committee

ELGC(5)-11-16 Papur 4 / Paper 4

Carl Sargeant AM  
Cabinet Secretary for Communities and Children  
Welsh Government  
5th Floor  
Tŷ Hywel  
Cardiff Bay  
CF99 1NA

21 October 2016

Dear Carl,

**Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence Act 2015**

I very much appreciated the time you and your official afforded to my Committee on 19 October. There were a number of specific points you indicated that you would respond to in a note to the Committee following your evidence. I would be grateful if you could provide the Committee with the following information:

- Detail on the legal consequences of not publishing the national strategy on time;
- What is the legal status of the Delivery Plan and how will objectives/or requirements be enforced?
- What sanctions are provided for under the Act, or are available to the Cabinet Secretary, if Local Authorities fail to adhere to any requirements under the Act?
- The number of schools currently using the Good Practice Guide on Healthy Relationships and when local authorities will start reporting on the Act;
- The contractual arrangements of the National Adviser. This related to resources and contracted days per week;
- The number of FGM cases identified in Wales and any further information on specialist services currently provided.

The Committee will be considering key issues emerging from its inquiry in early November with a view to preparing a report soon after. As such, I would welcome a response as soon as possible and by Friday 12 November at the latest.

Kind regards



John Griffiths AC / AM  
Cadeirydd / Chair



# Agenda Item 3.5

Carl Sargeant AC/AM

Ysgrifennydd y Cabinet dros Gymunedau a Phlant  
Cabinet Secretary for Communities and Children

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau  
Equality, Local Government and Communities Committee  
ELGC(5)-11-16 Papur 5 / Paper 5



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref MA (L) CS -5196-16

John Griffiths AM

Chair

National Assembly for Wales

Equality, Local Government and Communities Committee

National Assembly for Wales

Cardiff Bay

Cardiff

CF99 1NA

8th November 2016

Dear John

Thank you for your letter of 21 October following my attendance at the Equality, Local Government and Communities Committee on 19 October.

I will respond to each of the specific points raised as requested below:

- Detail on the legal consequences of not publishing the national strategy on time;

The National Strategy was published on 4 November 2016.

- What is the legal status of the Delivery Plan and how will objectives/or requirements be enforced?

One of the requirements of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 ("the Act") is for the Welsh Ministers to publish annual progress reports of the progress made towards achieving the objectives in the National Strategy and of the progress made towards achieving the purpose of the Act in Wales by reference to the national indicators. These, together with the Delivery Framework will demonstrate how effective we have been in achieving the objectives set out in the Strategy.

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400  
[Correspondence.Carl.Sargeant@gov.wales](mailto:Correspondence.Carl.Sargeant@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

**Pack Page 22**

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

The content of the Delivery Framework is still under development and the legal status be decided during the development phase. The Delivery Framework will be developed on a collaborative basis with a range of representatives and with input from the National Adviser. It is anticipated that stakeholders will ensure that the delivery milestones and objectives are met on the basis that they will have had significant input into their development.

- What sanctions are provided for under the Act, or are available to the Cabinet Secretary, if Local Authorities fail to adhere to any requirements under the Act?

As stated within section 21(3) of the Act if the National Adviser requests that a relevant authority provides information for the purpose of the exercise of any of the Adviser's functions, the authority must comply with the request unless the authority considers doing so would be incompatible with the authority's own duties, or otherwise have an adverse effect on the exercise of the authority's functions. These powers can be used if there were any issues of compliance.

- The number of schools currently using the Good Practice Guide on Healthy Relationships and when local authorities will start reporting on the Act;

Estyn will be conducting a thematic review of existing healthy relationship provision during 2016/2017 academic year.

Within this financial year, we will also develop Regulations to place a duty on Local Authorities to report annually on the action they are taking, including within schools, to promote the purposes of the Act.

- The contractual arrangements of the National Adviser. This related to resources and contracted days per week;

Rhian Bowen-Davies took up her post as National Advisor on 28 September 2015. This statutory advisory role is a public appointment and therefore Rhian Bowen-Davies is not a civil servant and not an employee.

The National Adviser currently works 3 days a week (22.5 hours), the appointment is for 3 years and is due to end on 28 September 2018.

- The number of FGM cases identified in Wales and any further information on specialist services currently provided:
- I can confirm that the FGM Statistics reported between April – June 2016 was 9 and between July – September 2016 was 11 (although data is still being received for this quarter).

I look forward to receiving a copy of the report detailing the key issues emerging from the inquiry.

Yours sincerely



**Carl Sargeant AC/AM**

Ysgrifennydd y Cabinet dros Gymuned a Phlant  
Cabinet Secretary for Communities and Children

# Agenda Item 3.6

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau  
Equality, Local Government and Communities Committee  
ELGC(5)-11-16 Papur 6 / Paper 6

Thank you for the opportunity to provide a follow up submission to the newly published National Strategy.

We regret that the submissions that we made to this committee previously and to Welsh Government in relation to the National Strategy have proven hopelessly insufficient to raise attention of the way in which male victims are being systematically ignored and marginalised in a carefully constructed strategy.

We wish to draw to the attention of the Committee that the Equality Impact Assessment for the National Strategy indicates that the Welsh Government have assessed that it will have a positive impact on men in section 4.3 on page 20 of the Assessment. We believe that this analysis has no grounding in fact whatsoever. We believe that the Strategy may therefore be capable of being overturned at Judicial Review.

In relation to the specific issues we raised with the Committee we can see that nothing in the final strategy has been considered either by the Committee or by the Welsh Government.

In relation to the Delivery Plan we are confident that it will continue to deliberately marginalise and devalue the experience of male victims. Services for men, designed with their interests at heart, will not be commissioned and they will continue to experience the unlawful discrimination currently perpetrated against them by many domestic violence services that 'screen' only male callers and determine them to be perpetrators masquerading as victims.

It is very noticeable that the National Strategy contains specific sections on various groups who it believes are worthy of special note and attention. These groups include for example 'Children and Young People (p12 & 13). In the strategy it states:

**'Violence against women and children, including domestic abuse or sexual violence in any family unit is a child protection issue and should be dealt with using the relevant safeguarding procedures.'**

There is no recognition of the reality that women abuse children at roughly the same levels as do men.

'Perpetrators were most likely to be a parent for those that had suffered psychological abuse (father, 35% and mother, 40%) or physical abuse (father, 39% and mother, 29%).'



The section on Children and Young People then continues with

‘Many women who are the victims of violence have children, and ensuring the well-being of those children must be a priority for both public services and the victim.’

It is clear that the Welsh Government has no concern whatsoever for the reality that men who are victims may also have children as well. We know that this is an honest assessment as we see the same demonstrated every day when services funded by Welsh Government routinely act to marginalise and discriminate against male victims.

We have previously drawn the attention of Welsh Government and the National Adviser to academic research produced by Dr Jessica McCarrick at Teeside University about the experience of male victims who seek help and support and are treated as perpetrators.<sup>ii</sup>

Finally in this section on Children and Young People the National Strategy states

‘We already know that women and children are at increased risk when they are involved in family court proceedings.’

Presumably this analysis by Welsh Government must have been taken from the research they commissioned from Welsh Women’s Aid *‘Are you listening and am I being heard’* This important research that is fundamental to the Strategy comprises the testimony of 66 survivors of abuse across Wales. One male survivor was included. It is hardly surprising that there is a complete absence of the experience of male victims of abuse in the Strategy. What we know however is that the overwhelmingly majority of applicants to the Family Court are male (70%) and that they represent 94% of those seeking contact with children.<sup>iii</sup> Many of these men are victims of coercive control at the hands of female perpetrators who are withholding contact. These female perpetrators are also breaching the rights of the child under Articles 3, 9.3 and 18.1 of the UNCRC.

Other groups identified in the strategy for special mention included Black and Minority Communities, Older People, LGBT+, Migrant, refugee and asylum seeking women and even Female survivors who commit offences. This last group are statistically unlikely to be a significant number in Wales. Women represent just 4.7% of the UK prison population at around 3,700. 46% of women in prison report having suffered domestic abuse.<sup>iv</sup> Assuming that Welsh women are no more likely to be sentenced to custody than their English, Scottish or Northern Irish sisters it appears that 95.5 Welsh women will be in prison and have reported suffered domestic abuse. In comparison around 39,000 men in Wales will have suffered domestic abuse.<sup>v</sup> However male victims do not merit a separate mention in this section.

We remain prepared to assist the Committee in a proper and fair analysis of the Welsh Government’s National Strategy which we believe is so deeply flawed as to be unworkable and unlawful.

PAUL APREDA, National Manager, FNF Both Parents Matter Cymru

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<sup>i</sup> Abuse during childhood: Findings from the Crime Survey for England and Wales, year ending March 2016  
<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/abuseduringchildhood/findingsfromtheyearendingmarch2016crimesurveyforenglandandwales>

<sup>ii</sup> <http://www.telegraph.co.uk/news/uknews/crime/12061547/How-male-victims-of-domestic-abuse-often-end-up-getting-arrested-themselves.html>

<sup>iii</sup>

<http://www.nuffieldfoundation.org/sites/default/files/files/Executive%20Summary%20with%20full%20disclaimer.pdf>

<sup>iv</sup> <http://www.womeninprison.org.uk/research/key-facts.php>

<sup>v</sup> on a proportionate basis for Wales of the number of men in the Crime Survey for England and Wales (ie 1 Welshman for every 18 Englishmen).

## **Welsh Women's Aid response to the call for comments on the National Strategy on Violence against Women, Domestic Abuse and Sexual Violence: 2016-2021**

Welsh Women's Aid has welcomed the final strategy from the Welsh Government. During the consultation period Welsh Women's Aid participated in workshops with officials, submitted a written consultation response and provided feedback within our role on the Advisory Group. It is clear that the Welsh Government has heard some of our concerns and responded to our consultation responses, taking into consideration some of our key points.

Within our response to the strategy we outlined ten key points that were pertinent to be addressed to ensure the strategy was effective. These points are outlined below with our explanation as to how these have been addressed and to what extent in the final strategy.

### **1. Keeps the UN VAW definition of violence against women as in the Right to be Safe Strategy.**

Welsh Women's Aid strongly welcomes that the strategy now includes the UN definition of Violence against Women and recognises that gender inequality is both a cause and consequence of violence against women. This will allow for clear continuation from the Right to be Safe Strategy 2010-2016, ensuring a commitment to tackling violence against women as a means of addressing gender inequality and ensuring Welsh women's human rights are protected. It ensures that the Welsh national strategy aligns with the UN, World Health Organisation, Crown Prosecution Service, UK governments and others. It means that the strategy is grounded on internationally recognised evidence base that supports a gendered approach to all forms of violence against women, including domestic abuse and sexual violence.

### **2. Includes long term objectives around primary prevention linked to gender equality work.**

Welsh Women's Aid welcomes the inclusion of a specific objective on primary prevention through raising awareness and challenging social stereotypes, attitudes, behaviours, and expectations. We also welcome the commitment to develop a National Communications Framework in consultation with stakeholders. This will require an appropriate budget line that goes beyond the cost of running one off campaigns but also recognises the need for evaluation of success in achieving long term change that any campaign should aim for and the short term increase in disclosures that should result from an effective campaign on violence against women. Investment in increasing the capacity of specialist services to respond to this increase must form part of the communication delivery plan. Similarly resources will need to be invested in specialist services to be involved in the evaluation of campaigns, especially their role in enabling survivors to participate in the evaluation processes.

While we welcome the priorities on challenging cultural attitudes, they continue to focus on BME communities and men and boys. We agree that these communities need to be included in the prevention of violence against women, however there is a need to challenge all cultural attitudes that underpin violence against women, domestic abuse and sexual violence, and therefore community champions from across all communities in Wales. Cultural attitudes persist across all communities, including victim blaming and rape myths, that enable all forms of violence against women to continue to be prevalent in our communities. The priority to

challenge these through effective communication plan as well as through education needs to form part of the delivery plan and subsequent communications framework.

**3. Commits to working with the specialist third sector to develop a model for sustainable funding for specialist services from 2017, to include specialist services for children and young people.**

Welsh Women's Aid welcomes that the strategy now recognises the crucial role of violence against women, domestic abuse and sexual violence specialist services specifically adding an action to develop a model for sustainable funding of this sector. This is particularly welcomed as domestic abuse/violence against women services that are Welsh Women's Aid members have stated that they are already under significant pressure and are concerned by an increase in demand without more investment to secure sufficient service levels across Wales.

While the strategy now outlines the priority to develop a model of sustainable funding for specialist sector, this needs to be reflected in the statutory guidance which needs to ensure collaboration between different commissioners including community safety, safeguarding, housing, supporting people, health and education as well as with non-devolved partners such as Police and Crime Commissioners, especially at local and regional levels.

The development of a model for sustainable funding of specialist services needs to be clearly outlined in the delivery plan with a definitive timeframe for delivery and clear mechanisms for this model to be co-produced with the specialist sector and collaboration across funding streams. This is a very pertinent issue as re-commissioning processes and local strategy development is already underway and having an impact on the funding of specialist services.

**4. Sets out the 'Change that Lasts model' as an early intervention coordinated community service model, to align with the Home Office Strategy.**

Objective 6 in the strategy sets out to provide survivors with holistic and resourced needs-led, strengths-based, gender-responsive support. This reflects the principles of the Welsh Women's Aid 'Change that Lasts' service model which delivers a needs-led, strengths-based, gender-responsive and trauma informed model of delivery involving survivors, communities, specialist services and trained trusted professionals to achieve earlier intervention and prevention of abuse and transforms how professionals and communities respond and how services are structured. This model is highlighted as an innovative good practice approach in the UK Government strategy, and there is significant scope and interest in delivering this approach within a violence against women legislative and policy context in Wales. This model provides a framework that facilitates the shortest and most effective route to safety, freedom and independence for each survivor based on their individual situation and the resources available to them.

It will be integral for the delivery plan to match this objectives commitment to the 'Change that Lasts' model and ensure that there is a model for sustainably funding its development and delivery, reflecting the commitment outlined above. The delivery plan will need to ensure that the actions support the development of this model in practice to build in the support for it in principle in the final strategy.

**5. Includes the 10 key recommendations made by survivors in the report to the Advisory Board in the strategy and ensure the detailed recommendations in the report inform the delivery plan.**

Welsh Women's Aid welcomes the clearer reference to the recommendations from survivors that were within our 'Are you listening and am I being heard? Survivor Consultation: A report of the recommendations of survivors of violence against women, domestic abuse and sexual violence in Wales', March 2016. We support the priority for developing a sustainable survivor engagement framework as part of the preventative priorities as well as other areas, which must include survivors being central to monitoring the implementation of the strategy, plan and accountability mechanisms. This must be resourced to ensure that it is not tokenistic but enables the diverse voices of survivors to continue to inform the delivery of the strategy.

These 10 recommendations now need to be reflected in the delivery plan so that action is taken to achieve what is needed. The Welsh Government will need to work with specialist services and survivors to ensure these recommendations can be delivered through SMART actions that are sufficiently resourced to be achievable and make a sustainable difference.

**6. Includes cross-governmental commitments for delivery from other Cabinet Secretary portfolios including health, education, local government and finance.**

As was outlined in our evidence and consultation response regarding the strategy, the impact of violence against women crosses many areas including health and wellbeing, education, housing, criminal justice, social services, children's services and equalities. Welsh Women's Aid has recommended that there should be cross-departmental investment into prevention, protection and provision of support in response to violence against women, domestic abuse and sexual violence. While this is referenced within the strategy, there now needs to be high level commitment to achieving this. This will require commitment across Cabinet Secretary portfolios to recognise cross-department responsibility and commit relevant resources. We would recommend that the delivery plan reflects cross-departmental commitments and accompanying investment to reflect this. This would reflect the commitments also made by Welsh Government in Taking Wales Forward 2016-2021 to "work across traditional boundaries" to deliver on priorities.

**7. Provides national leadership that clarifies the responsibility of regions and local public services to deliver against the objectives and outcomes.**

Welsh Women's Aid welcomes the inclusion of an action to develop guidance for local authorities and health boards to support them in the development and delivery of local strategies. The Welsh Government needs to provide leadership to local and regional commissioners on delivery of a collaborative model and hold them accountable for delivering a sustainable funding for specialist services in their region or locality. This should include effective governance and accountability for commissioning decisions via public service boards and regional collaborative committees, it remains unclear as to how the Welsh Government will hold relevant bodies to account in doing this.

**8. Cross-references to the UK Ending VAW Strategy for join with non-devolved objectives, in particular under protection.**

Welsh Women's Aid welcomes the reference made to the UK Government 'Ending Violence against Women and Girls Strategy 2016-2020' however the commitment to work collaborative

or have joined up approaches within the objectives and priorities set out in the final strategy remains minimal. The UK governments National Statement of Expectations are anticipated to be published imminently. There needs to be clear alignment between the commitments in the National Statement of Expectations and the delivery of the Welsh Government strategy to ensure that the provision of protection and support for survivors is cohesive across devolved and non-devolved remits. This needs to be reflected within collaborative actions within the delivery plan.

**9. Ensures the priorities are SMART and set out clear and measurable targets and timescales within the delivery plan.**

The delivery plan for the strategy needs to set out how the objectives and priorities are going to be achieved in a SMART manner that have clear outcomes and are measureable over a set timeframe. The delivery plan will need to include join up across relevant stakeholders including specialist services, it is therefore crucial that specialist services and other stakeholders involved are given an opportunity to consult and propose the actions set out within the plan. The specialist violence against women sector and survivors are keen to contribute their expert knowledge and experience to the development of the accompanying delivery plan. This should include a clear commitment to co-producing the delivery plan to ensure the actions meet the needs required and are achievable through the commitment and support of all stakeholders. We would welcome a clear proposal and timeframe as to how this has will be done.

The Wales Violence Against Women Action Group, which holds significant expertise within its membership, has offered to provide a task and finish group to consult on the development of the delivery plan, we are aware that this was noted during the post legislative review evidence sessions and Welsh Women's Aid, in consultation with the group, would like to reiterate that this offer stands.

**10. Cross-references the priorities to the Istanbul Convention principles to support specialist services and perpetrator intervention.**

We welcome that fact that the strategy supports the principles of the Istanbul convention and the statement to strengthen the Welsh Governments commitment to set out further measures relevant to the provisions of the convention. The convention establishes legal frameworks for the protection of women, punish perpetrators and to prevent and eradicate all forms of violence against women setting out minimum levels of provision. Member states are required to establish a comprehensive and coordinated policy addressing all forms of violence covered by the Istanbul Convention and offering a holistic response to violence against women. This includes the provision of refuge, floating support and support for sexual violence survivors and commit to providing the minimum standards of support for women and children as outlined by the Council of Europe. The inclusion of these principles and key provisions sets out a clear commitment by the Welsh Government to achieve these minimum standards and these should be reflected in the actions outlined within the delivery plan to ensure these are achieved.

**Budget**

Further to the points outlined above a critical issue with the final strategy is that throughout the strategy it remains unclear how any of the objectives and priorities will be resourced. The

strategy is not accompanied with a clear budget commitment to ensure that the strategy objectives and the related actions in the delivery plan are sufficiently resourced so as to be effective in achieving the ambitious aim of ending all forms of violence against women in Wales. The delivery plan needs to demonstrate how the actions will be clearly resourced and, similarly, set out how the delivery will be monitored.

#### **Broader Focus**

The strategy is still minimal on its reflection of the broadened approach the Act to incorporate all forms of violence against women including sexual violence, HBV, FGM and forced marriage as well as domestic abuse. The delivery plan will need to have a wide remit to tackle all forms of violence against women and work in collaboration/synergy with effective strategies and guidance, such as the forced marriage guidance, that are already in place.

Overall, as stated above, Welsh Women's Aid has welcomed the final strategy; we now need to see the principles and priorities outlined in the strategy built into practice through an effective delivery plan that is co-produced and accompanied with sufficient resources to ensure it is achievable.

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Any comments or questions regarding our response can be directed to: **Gwendolyn Sterk, Public Affairs Manager, 02920 541 551, [gwendolynsterk@welshwomensaid.org.uk](mailto:gwendolynsterk@welshwomensaid.org.uk)**