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Welsh Women's Aid Response: A call for information – Welsh Government Draft Budget proposals for 2022-23

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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). 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 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/>)

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Introduction

Welsh Women's Aid welcomes the opportunity to respond to this call for information. At the time of submitting this response we have recently launched our annual [State of the Sector report](#).¹²

This year's report, *A Strategy for Sustainable Support*, calls on the Welsh Government to renew its commitment to develop a sustainable funding model for the Violence Against Women Domestic Abuse and Sexual Violence (VAWDASV) specialist sector in the new VAWDASV Strategy. The report outlines why sustainable funding is absolutely crucial to ensuring survivors receive safety and support and outlines practically how the model can be developed.

We highlighted some of the key impacts of uncertain funding of services within the document which we hope will help inform the development of both a sustainable funding model, and the 2022-23 budget.

- There was a 22% increase in the number (692) of survivors who could not be supported by the refuge due to the lack of capacity or resources, when compared with the previous financial year.
- Refuge-based support services supported 283 children per quarter, showing a continued high number of children in refuge during the pandemic with limited access to specialist child support workers.
- Community based services received a 23% increase in referrals from the previous financial year and a 12% increase in the number of survivors who could not be supported by community-based support services due to resource and capacity issues.

The commitment for sustainable funding must be renewed and delivered if we are to guarantee that support for survivors will be available when they need it and should be part of Welsh Government plans for future budgets.

Consultation questions

1. What, in your opinion, has been the impact of the Welsh Government's 2021-22 budget including funding related to COVID-19?

We welcomed the following uplifts within the 2021-22 budget:

- Additional £1.6m to support VAWDASV preventative work
- Additional £40 million for the Housing Support Grant
- Additional £37m for social housing

¹ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/10/State-of-the-Sector-2021-ENG-1.pdf>

² <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/10/State-of-the-Sector-2021-CYM-1.pdf>

- Additional £4m for the Homelessness Prevention Grant (to continue emergency COVID provision)

However, what we continue to advocate for is a sustainable funding model for specialist VAWDASV services. Whilst we welcome additional money for prevention without strategic oversight, strengthened links with survivors and the specialist sector and clear local authority duties, this money is not allocated in the most beneficial way. There is very little public information on how this prevention money was allocated or what monitoring processes have been put in place to ensure it is meeting its intended purpose.

It needs to be recognised the Welsh Government VAWDASV Grant, is only a small proportion of the funding that specialist services received to enable them to deliver support. The VAWDASV Grant does not cover the significant amount of costs that it takes to have a network of specialist VAWDASV services across Wales. Specialist services are primarily funded through other government funding streams administered via local authorities and situated in other government directorate budgets, including Housing Support Grant, Community and Children's Grant as well as non-devolved funding via PCCs or UK Government such as the Rape Support Fund.

The Housing Support Grant is a vital to ensuring accommodation based provision is provided. We welcomed Welsh Government listening to calls for funding to be increased for the Housing Support Grant, which delivers homelessness prevention and housing-related support services in Wales. In preventing homelessness it is critical that the duties imposed by the Housing Act (Wales) 2014 enable survivors to access refuge and other accommodation options swiftly, or where appropriate, to stay safely within their own homes. Section 57 of this Act specifies that whether a person or a member of that person's household is at risk of abuse, including domestic abuse, is a factor in determining whether it is reasonable to continue to occupy accommodation.³ It remains the case that the number of survivors who continue to face barriers to accessing support, particularly due to additional support needs, continue to rise. The pandemic has magnified the importance of a safe and secure home. Each survivor's needs will be unique to their experience, services must be well resourced to offer this flexibility. There is also a clear need to strengthen protections and support options for survivors of sexual exploitation.

There was a significant increase in the following reasons for refusal from refuge over the previous financial year:

- Unable to meet support needs (around drug and alcohol) (27%)
- Unable to meet support needs (around mental health) (61%)
- Unsafe (perpetrator knows the location of the survivor/ refuge) (92%)
- No/ limited recourse to public funds (29%)

³ <https://gov.wales/sites/default/files/publications/2019-06/guidance-for-local-strategies.pdf>

A total of 692 survivors were unable to be supported in refuge due to capacity and 312 survivors remained on waiting lists for sexual violence services at the end of financial year 2020-21. Members do not currently feel able to widen preventative work, or to increase capacity in order to provide support to more survivors due to limited resourcing and uncertainty over sustainability of funding.

The COVID-19 pandemic has already resulted in an increase in contacts from survivors (22%) and concerned others (43%) to the Live Fear Free Helpline during 2020-21. The impact of COVID-19 restrictions on survivors' experiences of abuse and violence is likely to lead to increased long term support needs, including provision for children and young people. Increased mental health needs are expected to increase as the long-term impact of COVID-19 and increased austerity affects people's health and wellbeing; it is likely that the demand for provision will only increase over time.

If another unexpected event such as the COVID-19 pandemic were to happen, then services would not have the means to facilitate the flexibility to adapt services and meet increased needs, especially not without compromised quality and staff burnout.

Emergency funding

A large majority of emergency funding for specialist VAWDASV services to address impacts of the COVID-19 pandemic were due to come to an end in March 2021. Our membership constantly reported that this approach to funding has been counterproductive in aiding them in providing a service to all who need it. Last minute decisions to extend funding to 2021-22 financial year or additional short term emergency funding, came too late to retain staff on short term contracts or added additional burdens of new funding application processes. For small services short term and last-minute funding process often create additional bureaucratic processes that they do not have the capacity to engage with.

There was also a reported lack of consistency in the way these funds have been administered through regional approaches. As highlighted in our response last year, whilst in some region's approaches were effective in identifying needs of local services and administering swift access to funds. Some specialist services have noted this has not happened swiftly across all regions and levels of monitoring have been bureaucratic and burdensome in some areas. Greater oversight and leadership from Welsh Government is required to ensure that funding is administered with equitable processes across all regions. This would be greatly helped through the implementation of a sustainable funding model and monitoring of adherence to the Welsh Government statutory VAWDASV commissioning guidance across all relevant devolved public funding streams for the sector.

These issues have continued into the 2021-22 financial year, with increased difficulty to the existing issues around staff recruitment and retention.

Staff retention is an extremely pertinent issue currently facing specialist services. As an example, our members are currently able to pay £20,541 for a support worker role, whilst local housing association pay between £24,000 -£26,000 for similar roles. Even for equivalent roles, specialist services receive significantly lower funding to offer wages. For instance, an ISVA in a rape crisis centre has a wage of £27,444 but the statutory sector run SARC offers a wage of £35,000 within the same locality.

This inequality is particularly stark in specialist children and young people roles where an average local authority based role working with children pays 9.1% higher than those in the VAWDASV sector that require additional specialisms and skills. The specialist sector is working within tight budgets and has less flexibility than larger generic or public sector to raise wages to attract appropriate staff when necessary.

Other challenges include:

- Staff may feel undervalued seeing higher wages outside of the third sector
- Additional training and support costs for recurrent new staff put services at financial risk
- Capacity is taken away from service delivery to train new staff
- Creating roles around specific funding requirements set by government bodies, rather than meeting the needs of survivors.
- People not wanting to change jobs during the uncertainty of Covid-19

Children and Young People

Concerns have consistently been raised by services and wider stakeholders about the existing postcode lottery of specialist services for children and young people affected by VAWDAS across Wales. We are concerned about the current capacity levels of specialist services to provide adequate support and the knowledge of public bodies, including schools, to enable early intervention and referral routes to specialised services. Limited specialist support and ineffective statutory responses to disclosures are leading to some young reporting significant impact on their ability to recover from the abuse.⁴

The 'I Trust Them' Report 2021⁵ highlighted the need to address the way in which children and young people who are experiencing VAWDASV are responded to when they seek support, as well as improving education and awareness-raising around what constitutes VAWDASV. The findings suggest that normalisation / lack of understanding of abuse, combined with a culture of victim-blaming, remain prevalent factors affecting young people's likelihood of seeking support. It is also clear that key institutions, especially the police and education, are not considered accessible,

⁴ <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/06/I-trust-them-CYP-Resilience-Survey-Report-English-1.pdf>

⁵ Ibid

desirable, or trustworthy places to seek support by many young people, and that this is partly due to previous bad experiences and/or lack of means to attend. This is more pronounced for young people from Black and minoritized backgrounds.

Worryingly, there are still some specialist VAWDASV services in Wales that do not have any dedicated funding for support children and young people. Provision is very limited when compared to the population in the areas of service coverage. Short-term (mostly from trusts and foundations) and low levels of funding means that services are precarious. This impacts on staff-turnover and service continuity, which impacts adversely on children and young people who have experienced trauma and need time to build trusting relationships with professionals.

This said, some VAWDASV services in Wales are offering trauma-informed specialised domestic abuse and sexual violence counselling, and play therapy services for children and young people, which could inform best practice and development and commissioning of further services.⁶

The current lack of strategic commitment and funding is often due to the needs of children and young people affected by VAWDASV not being identified within strategic commissioning processes. Often specialist service funding is centred on adults needs, meaning children and young people's provision, if available, is often incumbent of an adult entering services.

Staff turnover, and difficulties recruiting have a financial and emotional cost. Delivering a trauma informed, needs- led service means having consistency and stability for survivors, particularly children and young people.



If long term funding is not gained, we will lose all our children's workers.



COVID-19 has brought into sharp focus the sector's inability to cope with sudden change in need, with the current funding structure, and the long-term effects this will have on service provision. Specialist services made huge efforts to ensure the support was available to survivors when they needed it, but short-term funding cycles, non-flexibility in grants and trouble with emergency funding reaching the

⁶ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/11/Children-and-Young-People-participation-report-FINAL.pdf>



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front line⁷ meant this support came at a human cost. Our members and their staff continue to work tirelessly as the response to the pandemic continues to develop, and they consistently report staff burn out and vicarious trauma. The year on year funding cycles and short-term emergency funding exacerbates this through limited job security and ability to retain trained, expert staff within the sector. This has knock on impact on service deliver, leaving gaps in provision due to regular gaps in recruitment, increasing waiting lists and limiting levels of support.

2. How do you think Welsh Government priorities for 2022-23 should change to respond to COVID-19?

The COVID-19 pandemic continues to magnify existing gaps in policy, planning and provision relating to Violence Against Women, Domestic Abuse, and Sexual Violence (VAWDASV). The VAWDASV sector has seen further challenges, such as staff shortages however have continued to work tirelessly to maintain their provision as an essential service during and following the COVID-19 pandemic. In the last financial year, a shadow pandemic was declared by the United Nations in light of the increases globally of VAWDASV during COVID 19.⁸ Evidence has shown that violence against women tends to increase during every type of emergency, including epidemics.⁹ In our response to the 2021-22 budget we highlighted how the pandemic has exacerbated already existing inequalities. Older women and women with disabilities are likely to have additional risks and needs.¹⁰ Imkaan has reported that services led 'by and for' black and minoritised women have reported significant increases in demand – particularly for refuge spaces.¹¹

The pandemic has had a huge impact on every part of every society; for the VAWDASV sector it was magnified the devastating lack of flexibility allowed by the current funding model and strategic oversight at national and regional levels. This impacted services abilities to deliver support. Despite the welcomed emergency funds during the pandemic providing some assistance the overall model of unstable and uncertain funding means services have not been able to support survivors in some of the most vulnerable situations facing multiple disadvantage.

Violence Against Women, Domestic Abuse and Sexual Violence is a Welsh Government priority. Welsh Women's Aid call for this priority to be re-centred and at the forefront of policy and decision making

⁷ <https://www.welshwomensaid.org.uk/2020/04/welsh-womens-aid-stresses-urgent-need-for-funding-for-support-services-due-to-covid-19/>

⁸ <https://www.unwomen.org/en/news/stories/2020/4/statement-ed-phumzile-violence-against-women-during-pandemic>

⁹ <https://www.cgdev.org/sites/default/files/pandemics-and-vawg-april2.pdf>

¹⁰ <https://apps.who.int/iris/bitstream/handle/10665/331699/WHO-SRH-20.04-eng.pdf?ua=1>

¹¹ Imkaan, The Impact of the Two Pandemics: VAWG and COVID-19 on Black and Minoritised Women and Girls, May 2020 https://829ef90d-0745-49b2-b404-cbea85f15fda.filesusr.com/ugd/2f475d_6d6dea40b8bd42c8a917ba58ceec5793.pdf

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across portfolios including health, housing, education and the economy. This requires VAWDASV to be a priority within it is budget across portfolios.

Welsh Government must ensure that VAWDASV specialist services are adequately resourced to meet known levels of current demand for support presented in every local authority area, as identified in needs assessments and by specialist services and commissioners working together.

There must be a renewed commitment to investing in the delivery of duties within the existing legislation across all directorates. The Violence Against Women, Domestic Abuse and Sexual Violence (Wales) 2015 Act has existed now for six years, and there are still areas where commitments are not closer to being reached. The COVID-19 pandemic has highlighted the lack of cross government strategic awareness and focus on the legislation's intended purpose to enable a cross-government, cross-department response to end VAWDASV and end the postcode lottery survivors face when seeking safety and support. We believe that until the purpose of the Act is achieved, consequences of the pandemic will continue to disproportionately effect survivors of VAWDASV.

Additionally, the national strategy ends this year (2021), the new strategy, now in development, must be ambitious, and include measurable actions cross-government aligned to adequate budget commitments to achieve these.

The Welsh Government must provide leadership to local authorities and health boards to ensure that these are delivered across all regions, in particular ensuring that the Statutory VAWDASV Commissioning Guidance is adhered to across all devolved funding streams at a national and local level. Feedback from specialist services notes that the guidance is not being adhered to across local authority commissioning practices or national funding streams. With specialist services being taken in house without effective consultation of survivors and counter to expert advice. With emergency COVID-19 grants, specialist services have fed back to Welsh Women's Aid that processes have been overly bureaucratic and have not reflected the principles of flexibility and swiftness that were so welcomed when set out by Welsh Government. We have raised this with Welsh Government however there seems to be limited leadership in holding local authorities to account in line with the statutory VAWDASV commissioning guidance.

A clear budgetary alignment to achieving the national strategy and deliver plan with re-instated governance structure to provide leadership and oversight, that is emulated across regions would assist in ensuring that there is greater progress in the aims of the VAWDASV (Wales) Act 2015 and allow for the legacy of what has been achieved through this strategy to be built on. Similarly, it would provide strength to hold to account regional bodies to their duties under the Act and effectively provide oversight to monitoring the implementation of a sustainable funding model and commissioning guidance.

3. How financially prepared is your organisation for the 2022-23 financial year, and how can the budget give you more certainty in planning and managing budgets given the

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ongoing volatility and uncertainty?

A continued issue for VAWDASV specialist services is short term (one year) funding cycles. As we highlighted in our response to the committee in its call for evidence on the 2021-22 budget (and several previous years) the VAWDASV sector continues to face uncertainty because of a lack of secure and sustainable funding. Specialist by and for Black and minoritized women services, services for women with multiple needs and sexual violence services remain particularly at risk. Little has changed since our State of the Sector 2018 report found sexual violence services faced the largest overall reduction in funding during the previous two financial years of 20.2%. Our last two annual State of the Sector reports have set out clear recommendations for the delivery of a sustainable funding model for the sector. Sustainable should mean longer term funding (at least five year cycles), cross directorate budgetary commitment and high quality, collaborative commissioning practices.

As previously highlighted there is a postcode lottery for children's workers, the lack of available support for survivors with no recourse to public funds, and the impact of cost of living increases. The preparedness of the sector for the coming year in terms of funding in regards to these issues has not improved, and these existing issues have been further magnified and exacerbated by the continued development of the COVID-19 pandemic.

These remain priorities and areas which need to be urgently addressed by Welsh Government and reflected in its development of the 2022-23 budget. VAWDASV specialist support services are currently funded through a patchwork of local, regional and national commissioning and grants as well as charitable funding pots - often with short contracts. Welsh Government continues to provide each local authority with grant funding to invest in VAWDASV, however, this grant represents a very small part of the overall resources that will be invested across Welsh Government and the wider statutory sector. There remain differing funding levels and processes according to different local authorities, Health Boards and Police and Crime Commissioners.

Significant areas of government—economic policy, health, education, employability, poverty, addressing serious violence, for example—have evidenced little commitment to investing in preventing or responding to VAWDASV to date. Others such as housing, social services, children and communities invest in responses relevant to VAWDASV but are not joined up to the strategic approach to VAWDASV, posing the danger of ineffective responses being funded, duplication and siloed approaches.

We make similar arguments for sustainability of funding year on year. The main issues continue to be:

- **Security for survivors.** The number one goal of all VAWDASV specialist services is to be there to offer safety and support for survivors. Membership surveys consistently show that due to funding circumstances, many services are unsure of how they will be operating the following year. Survivors deserve to know that support for them is consistent and will always be there for them if they need it.



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- **Staff retention.** Over 50% of our members have told us (in the last 3 months) that recruitment continues to be a concern. Uncertain funding means an increase in short-term contracts, making it more difficult for services to recruit and retain their workforce. Specialist services require staff with specialist skills, meaning a lot of time and resource is invested in training and support. Having to retrain multiple new-starters due to difficulties in retaining workforce is unsustainable.
- **Competitive tendering.** Current tendering processes are pitting specialist services against each other as competitors rather than allies. Members constantly report wanting to share knowledge, skills and resources, and though this does occur services also have to consider how they will survive to continue vital work supporting survivors and staff when time comes to tender for contracts.
- **Postcode lottery.** Services are not funded consistently across Local Authorities and this lack of an overall view of how the specialist sector is funded makes it difficult to identify gaps in provision and think strategically on ending VAWDASV as a whole. The core aim of the VAWDASV (Wales) Act 2015 was to end postcode lottery in the prevention, protection and support for VAWDASV, that this continues nearly 7 years later highlights significant need to prioritise strategic leadership in the Acts implementation.
- **Firefighting and capacity for future planning.** Short funding cycles only allow services to focus on the crisis right in front of them, and leaves little room for strategic planning, prevention or wider work which would benefit survivors' experiences and enable long-term freedom from abuse.
- **Limited activities and bureaucracy.** Funding coming from an uncoordinated variety of sources means services must dedicate a lot of time and resources to writing applications and reporting to multiple outcomes frameworks. These different pots are also often for specific activities and limits wider strategic thinking.

With the recent UK Spending review projecting the next three years, this is an opportune time for Welsh Government to explore longer term funding cycles and monitor changed practices and benefits.

4. Given the ongoing uncertainty and rapidly changing funding environment do you think there should be changes to the budget and scrutiny processes to ensure sufficient transparency and Ministerial accountability?

Absolutely. Welsh Women's Aid have been part of the steering group informing the development of the new VAWDASV strategy. In an in-depth briefing¹² we referenced that governance and accountability must be a key part of this strategy's delivery. At present there is no collective

¹² <https://www.welshwomensaid.org.uk/wp-content/uploads/2021/11/WG-National-VAWDASV-Strategy-Consultation-Briefing-21-1.pdf>

framework under which these areas and groups sit within the work of the National Strategy or provide links to related areas of government work such as housing, curriculum development, safeguarding, child sexual abuse strategy, modern slavery, equalities, mental health and substance misuse. It is vital that the proposed blueprint and new strategy are representative and provide cross government directorate framework to oversee delivery There needs to be scrutiny from Welsh Government to ensure that adequate levels of investment from all relevant grants to VAWDASV is committed to across all devolved public bodies within the VAWDASV (Wales) Act 2015 is actually happening on the ground to ensure the prioritising of prevention, support and protection.

Recommendations

- Create a national strategy and delivery plan which includes cross-government action, developed, implemented, and monitored in partnership with survivors and the specialist sector.
- The new strategy must be ambitious, and include measurable actions cross government, and set out how it will work with devolved public body duties of local authorities and health boards.
- Re-instate a national oversight group led by the Minister, with cross government, public sector, VAWDASV sector and survivor representation, this groups should provide a framework for thematic groups to feed into.
- Implement the requirement for regional strategic VAWDASV boards to build collaborative governance of strategies at local levels in line with Welsh Government Local Strategies Guidance.¹³

6. 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, particularly in light of the COVID-19 situation and how these should be reflected in the 2022-23 budget?

– How resources should be targeted to support economic recovery and what sectors in particular need to be prioritised.

There has been a significantly high prevalence of violence against women for far too long. VAWDASV is a vast spectrum and a pervasive threat that women and girls are contending with on a daily basis, including their ability to participate in work and education.

- 1 in 3 women in Wales will experience physical or sexual violence in their lifetime. (FRA Report)

¹³ <https://gov.wales/violence-against-women-domestic-abuse-and-sexual-violence-guidance-local-strategies>



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- Live Fear Free Helpline responded to 30,063 contacts last year – there was a 22% increase in contacts from survivors and 43% increase in contacts from concerned others. (Live Fear Free 2020-21 statistics)
- Four out of five women in Wales have experienced some form of workplace sexual harassment. (No Grey Are: Welsh Women's Aid)
- 97% of women aged 18-24 have been sexually harassed. (UN Women)
- 1.5% of reported rape cases result in a charge. (Home Office)

Welsh Government has stated 3 years ago it is working on making Wales the safest place for women, however since that announcement at least 24 women are suspected to have been killed by male violence. Violence against women and girls should be an absolute priority.

– Welsh Government policies to reduce poverty and gender inequality.

All forms of VAWDASV are rooted in and are expressions of unequal gender relations in society; these reinforce and intersect with sexism, racism, homophobia and other forms of discrimination. The violence, abuse and disadvantage faced by women intersects with factors such as ethnicity, age, class, sexuality and disability, meaning these women experience these atrocities in a different, often more severe way.

Welsh Women's Aid welcomed the Welsh Government announcement in October 2018 that it supported the Istanbul Convention in principle and call for the UK government to ratify. In the current National VAWDASV Strategy, the Welsh Government sets out its commitment to the articles of the convention that align to the reserved powers of the Welsh Government. The convention sets out a minimum standard for adhering states to “take necessary legislative and other measures to promote and protect the right for everyone, particularly women, to live free from violence in both the public and private sphere.” (Article 4)

If the Welsh Government is to adhere to its statement of support then the budget must set out levels of funding that meet the requirements of the convention to ensure all survivors have a right to support. As the convention sets out violence against women, domestic abuse and sexual violence is both a cause and consequence of gender inequality.¹⁴

Structural inequalities and discrimination based on class, sexuality, ethnicity, immigration status, ability, mental health, or age, can lead to some women and girls being more likely to be abused and to face additional barriers in accessing justice and support. Intersecting inequalities within structures, practices and social norms can lead to additional layers of legitimising, condoning or concealing of violence and abuse which, in turn, sustains and reproduces these inequalities. Systemic barriers facing Black and minoritised women, migrant women, Deaf and disabled women, LGBT+ survivors and women facing multiple forms of disadvantage must be dismantled.

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The Domestic Abuse Act 2021 failed to meet commitments under the Istanbul Convention, particularly as it does not guarantee support for migrant women with no recourse to public funds (NRPF). In 2020-21 29% of referrals from women with NRPF to refuge s in Wales, were not accepted due to the lack of capacity or resource to meet the need. Welsh Women's Aid are urging the Welsh Government to have its own approach to ensuring all survivors have access to safety and support in line with its commitments to be a Nation of Sanctuary. Welsh Women's Aid has been formally advised by barristers that the Welsh Government would be acting within its powers if it provided a fund to support survivors affected by the NRPF rule. We therefore urge the Welsh Government to be bold and lead the way on implementing Article 4 of the Istanbul Convention through providing a last resort fund to support women with NRPF within its new budget.

In our joint report with Disability Wales¹⁴ we made a series of recommendations for Welsh Government which we feel should be included as commitments in the next strategy. Particularly around incorporation of the UN Convention on the Rights of Disabled People (UNCPRD) in Welsh policy and legislation, access to support and strategic regional partnership. In December 2019 the Welsh Government announced an uplift for 1.2 million capital funding of the sector to support increased accessibility, due the pandemic this fund was repurposed by Welsh Government to support the impact of COVID costs on adapting services. Welsh Women's Aid asked the Welsh Government in a letter in April 2020¹⁵ how it will ensure funding is provided to address the original needs that still exist and need to be resourced with even greater urgency than before. The increase of survivors unable to be supported by services due to the lack of capacity or resources to meet their needs has highlighted the impact of the lack of these additional funds. This new budget must address this to ensure equitable access to support for all survivors.

It is vital that the new budget enables equal access to support through effective resourcing of services as well as ensure that the National Training Framework delivery adequately improves understanding and response for disabled women who are survivors of VAWDASV.

This budget must take into account the new VAWDASV strategy, being developed in parallel to Wales' LGBTQ+ Action Plan, the Ending Homelessness Action Plan and the Welsh Government Race Equality Action Plan. These strategies should be supportive of one another, inform the development of this budget and work holistically to tackle the root causes of violence and inequality. Cross governmental work should facilitate joined up working across strategic areas to align equalities work and VAWDASV.

¹⁴ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/04/WWA-and-Disability-Wales-2019-report-Final-ENG.pdf>

¹⁵ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/04/COVID-19-VAWDASV-Funding-Public-Letter-to-Deputy-Minister-22.04.2020.pdf>

– Approach to preventative spending and how is this represented in resource allocations (Preventative spending = spending which focuses on preventing problems and eases future demand on services by intervening early).

For years, experts have been referring to violence against women as a major public health problem.¹⁶ This recognises the intersection of factors occurring at the societal, community, relationship and individual levels which increase the likelihood of VAWDASV.¹⁷ Applying a public health approach to VAWDASV requires implementing three types of prevention interventions: primary, secondary, and tertiary prevention across all these levels.¹⁸

Alignment between the duties of the VAWDASV (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015 should mean our public bodies can be ambitious in prioritising the prevention of VAWDASV. This includes investing in public health campaigns that challenge and change attitudes, high-quality relationships and sexuality education for all children and young people, and community engagement programmes that increase communities' knowledge and confidence to enable them to address the root causes such as gender inequality and intersecting discrimination.

Recommendations

- Set out a clear budget commitments across public health, education and community engagement to support prevention work across Wales.
- Ensure alignment of the implementation of the RSE curriculum with the strategy and enable the engagement of VAWDASV leads and specialist services with RSE leads and education professionals.
- Include the co-production of long term public health campaigns aimed at challenging and changing attitudes, align these to community training programmes.

– What are the key opportunities for Government investment to support 'building back better' (i.e. supporting an economy and public services that better deliver against the well-being goals in the Well-being of Future Generations Act).

Throughout the pandemic VAWDASV specialist services have been making concentrated efforts to both support survivors and raise awareness that support is available. New ways of working have been developed by the sector out of necessity to mitigate damage and stretch limited resources. Practices such as moving from physical to phone and online support where possible, managing a reduced

¹⁶ <https://www.who.int/news-room/fact-sheets/detail/violence-against-women>

¹⁷ Hagemann-White et al. (2010) 'Review of Research on Factors at Play in Perpetration'; <https://www.humanconsultancy.com/assets/understanding-perpetration/bin/Review%20of%20Research.pdf>

¹⁸ <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/12/A-Blueprint-for-the-Prevention-of-VAWDASV27918.pdf>



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workforce, social-distancing in refuge, and remote contact with children and young people have been adopted.¹⁹ In July 2020, Welsh Women's Aid held a [Creating Change that Lasts: Responding to VAWDASV following the COVID-19 Pandemic Roundtable](#) that brought together stakeholders from public health, national and local government, health sector, criminal justice, academia and specialist services to outline how we can build back better. We provided the feedback from this roundtable to Welsh Government and the Future Wales consultation.

We want to take this opportunity to acknowledge the incredible effort our members and the wider specialist support sector has made in protecting the safety of survivors, but also stress that these 'new' methods cannot be sustained long-term. Sustainability and availability of provision to protect and support all survivors of VAWDASV should be a key priority for building back better.

As part of that round table, key stakeholders developed calls to action which are still just as relevant to the current situation, have not yet been fulfilled and should be taken into consideration within this upcoming budget:

1. Recentre Violence Against Women, Sexual Abuse, and Domestic Violence as a Welsh Government priority and renew commitment to embedding existing legislation across all directorates.
2. Ensure funding for the VAWDASV specialist sector is sustainable and reflects nuances across provision.
3. Proactively plan for the safety and support of survivors of sexual exploitation and women engaged in prostitution.
4. Frame 'perpetrator work' as 'prevention work' and ensure a multi-tier of interventions.
5. Commit to a long-term solution for supporting survivors with no recourse to public funds (NRPF).
6. Ensure referral routes to specialist services are prepared for a rise in disclosures by children and young people at schools. (This is particularly relevant as the new RSE curriculum is rolled out)
7. Ensure dedicated children workers in both refuge and community services to provide practical and therapeutic services for children and young people to enable them to recover from their experiences, recognise abuse and develop healthy relationships in the future.
8. Increase the availability of varied flexible accommodation and support for survivors.
9. Do not default back to the inadequacies of pre-COVID court proceedings.

¹⁹ <https://www.welshwomensaid.org.uk/2020/03/responding-to-violence-against-women-domestic-abuse-and-sexual-violence-during-the-covid-19-pandemic/>



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All of the above recommendations require sustainable investment from the new budget and clear oversight structures to ensure this investment is joined up and effectively administered to the specialist services carrying out the work on the ground.

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