

Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Cyllid](#) ar [Cyllideb Ddrafft Llywodraeth Cymru 2024-25](#).

This response was submitted to the [Finance Committee](#) consultation on the [Welsh Government Draft Budget 2024-25](#).

WGDB_24-25 23: Ymateb gan: Cymorth i Ferched Cymru (Saesneg yn unig) | Response from: Welsh Women's Aid (English only)





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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. Our membership comprises of 20 specialist support services. These services deliver lifesaving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence against children and young people, men and boys, trans and non-binary people, 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 also award 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](#)).

Introduction

Welsh Women's Aid welcomes the opportunity to response to this call for evidence.

At the time of submitting this response, demand on violence against women, domestic abuse and sexual violence services is soaring.

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We acknowledge the significant financial pressures faced by Welsh Government. We appreciate that the Welsh Government is facing around £900 million less in real terms than forecasted by the UK Government in the last spending review, and we welcome the First Minister's statement¹ around the budget, focusing on the prioritisation of frontline services. However, the impact of these financial pressures on survivors of VAWDASV and the services that support them are clear.

Survivors of VAWDASV continue to be on the sharp end of the recovery from the pandemic and the economic outlook for 2024-25 remains concerning. Whilst we recognise that the Welsh Government is facing increasing pressure to provide services in the face of economic uncertainty, we remain concerned that last year's budget did not go far enough to address the root causes of economic inequality within Wales, and the consequences of this on survivors of VAWDASV are multi-factorial. Much evidence suggests that in times of economic turmoil, women bear the brunt much more heavily and this has ongoing effects on rates of all forms of violence against women and girls. As such, despite welcome protection for funding for VAWDASV services, we believe there is much more the Welsh Government could do to ensure their promise of making Wales the safest place for a woman to live becomes a reality.

1. What, in your opinion, has been the impact of the Welsh Government's 2023-2024 Budget, including funding related to the recovery of the pandemic? Have Welsh Government business support policies been effective, given the economic outlook for 2024-25?

Despite the trying economic circumstances, we welcomed the following in the 2023-24 budget:

- An increase of £130,000 for VAWDASV from the indicative budget
- A 5% increase in funding for the VAWDASV regions
- A 4% increase in funding for specialist services
- £18.8 million of additional funding for the discretionary assistance fund (DAF) to provide support for those most acutely affected by the cost-of-living crisis

However, we are disappointed that these increases are sub-inflationary for the time period, and that there has been both a net reduction in the social justice budget, and a £4.2 million reduction in funding for the equality, inclusion, and human rights budget. We are also disappointed that funding for the Housing Support Grant has been maintained at a baseline of £166 million. The Housing Support Grant is vital to ensuring accommodation-based provision such as refuge services are delivered, and that the Grant has not been increased on par with inflation leaves services soaking up the cost.

¹ <https://www.gov.wales/written-statement-update-about-budget-2023-24>





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Levels of domestic abuse and sexual violence increased sharply during the pandemic and as yet show no signs of abating. However, pandemic-related crisis funding that was granted to specialist domestic abuse and sexual violence services has halted, leaving services either having to make up this shortfall from their reserves, or cut services. As such, we strongly urge Welsh Government to consider the real levels of need at present as we continue to recover from the pandemic, rather than only in times of crisis themselves.

We continue to see rises in the number of survivors needing direct support from services, and the complexity of the support they require. In the 2022-23 financial year, data from our membership of services shows:

- 46% of survivors referred to refuge were unable to be supported, the majority of whom (28%) were unable to be supported due to a lack of refuge space
- A 24% increase in the number of children attending awareness raising training and/or workshops
- A 28% increase in reports of finance abuse experienced by survivors accessing community-based services
- An 11% increase in reports of child-to-parent abuse by survivors accessing community-based services

Across the same time period, data from the Live Fear Free Helpline shows:

- 23,272 contacts were made to the Helpline, 54% of which (10,849) were directly from survivors
- A 33% increase in contacts via email
- A 43% in contacts via text
- A 63% increase in handling time
- A 64% increase in talk time

Consequently, despite welcoming the protected funding within the VAWDASV budget, we do not believe current funding levels are sufficient to provide the support required at present, or for the continued increase in demand expected throughout the 2024-25 financial year and beyond.

2. How should/could the Welsh Government support the economy and business following the pandemic, Brexit and inflationary and other economic pressures?

– How financially prepared is your organisation for the 2024-25 financial year, how will inflation impact on your ability to deliver planned objectives, and how robust is your ability to plan for future years?

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Welsh Women's Aid is an umbrella organisation representing 20 specialist service providers located across Wales. We are fortunate to receive core Welsh Government funding alongside a number of competitively tendered-for grants to support our work and to provide onward funding to frontline services. However, we have previously outlined that a continued issue for specialist services in the VAWDASV sector and beyond is short funding cycles. We have highlighted in several previous budgetary calls for evidence that the VAWDASV sector continues to face uncertainty because of a lack of secure and sustainable funding, and this uncertainty is exacerbated by the current economic climate. The impact of this insecurity on service delivery cannot be overstated. In particular, smaller, more specialist services such as sexual violence services, services by and for Black and minoritised ethnic women, Deaf and disabled women, and the LGBT+ community, and services supporting women with multiple support needs remain most at risk.

Little has changed since our most recent reports^{2,3} on the issues facing the VAWDASV sector, and our clear recommendations for a sustainable funding model for the sector – which we have consistently highlighted as critical within our last 6 state of the sector reports – have not yet been forthcoming. Sustainable funding should mean longer-term funding (at least three- to five-year funding cycles, as proposed for recipients of the Welsh Government Equality and Inclusion Grant⁴), cross-directorate budgetary commitment and high-quality, collaborative commissioning practices. We appreciate the work of the VAWDASV blueprint to include a workstream dedicated to a sustainable whole system approach, which includes sustainable commissioning, and we eagerly await the outcomes of the national consultation exercise. However, more clarity is needed from Welsh Government on the work of the group, how progress is being measured, what changes will be implemented and when the benefits of this will be felt by frontline services.

Over and above this, we have highlighted the postcode lottery that exists across Wales for many types of service. For example, our Duty to Support report, commissioned by Joyce Watson MS, identified a postcode lottery of services for children and young people across Wales, leading to some children reporting a significant impact on their ability to recover from abuse.

Further, while we welcome the Welsh Government's recent consultation on the public health approach to preventing gender-based violence, and the commitment to a whole society approach in the most recent VAWDASV Strategy, we highlighted in our response to the consultation that long-term, sustainable funding is crucial to implementing a public health approach, and that a lack of funding and resource means that investment has often focused on tertiary prevention measures. We believe that all forms of prevention of VAWDASV must not operate in isolation and there must be clear evidence within the

² <https://welshwomensaid.org.uk/wp-content/uploads/2022/11/Perfect-Storm-Report-ENG-compressed.pdf>

³ <https://welshwomensaid.org.uk/wp-content/uploads/2021/11/State-of-the-Sector-2021-ENG.pdf>

⁴ <https://www.gov.wales/consultation-future-funding-equality-and-inclusion-grant-programme.html>

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allocation of the budget of a cross-jurisdictional strategic approach to tackling VAWDASV and to prevent duplicated or siloed working which will lead to an ineffective response to the scale of VAWDASV in Wales.

Ultimately, these issues leave specialist services and the VAWDASV sector as a whole in an extremely precarious financial position year on year, with this financial year as no exception, and the budget must commit to long-term thinking and joined-up working to properly tackle gender-based violence.

3. What action should the Welsh Government take to help households cope with inflation and cost of living issues?

The impacts of increasing inflation and the cost-of-living crisis continue to impact survivors of VAWDASV acutely.

It is worth noting that although inflationary pressures are decreasing, this is not being felt by people in their everyday costs. According to a recent Office for National Statistics survey⁵ from August-September 2023, 51% of adults reported an **increase** in their cost of living compared to the previous month. This is likely to worsen with the end of large-scale financial support such as the Energy Price Guarantee, and the UK Government's cost of living payments.

Reports of financial and/or economic abuse continue to rise as a result of the cost-of-living crisis. Indeed, data from our membership of specialist domestic abuse and sexual violence services in Wales shows that between the 2021-22 and 2022-23 financial years, community-based services saw a 28% increase in survivor reports of financial abuse. This continues to be compounded by default joint Universal Credit payments and the two-child benefit cap, which we know prevent women from accessing independent finances and can trap survivors in abusive relationships.

Although economic abuse remains prevalent, support is still lacking. We welcomed the announcement⁶ by the UK Government that survivors of VAWDASV in England and Wales will be given direct payments to support them to leave abuse relationships. However, we note that this scheme is only in the pilot phase and we urge the Welsh Government to both lobby the UK Government to make this scheme permanent and to set up a similar crisis fund.

The cost-of-living crisis is also continuing to affect the sector more broadly. Many of our member organisations who provide direct services such as refuge continue to see significant increases in their day-

⁵<https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/bulletins/publicopinionsandsocialtrendsgreatbritain/23augustto3september2023>

⁶<https://www.gov.uk/government/news/victims-fleeing-domestic-abuse-given-lifeline-payments>





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to-day running costs. This is exacerbated by inflexible funding that generally bases financial projections on last year's costs, meaning services are operating at sub-inflationary grant-based income, and have to recoup those costs from their own reserves. While many were able to access short-term emergency funding, much of this has ceased, leaving services in an unstable financial position.

– How should the Budget address the needs of people living in urban, post-industrial and rural communities and in supporting economies within those communities?

It must be noted that the cost of accessing services is particularly high for survivors of VAWDASV in rural parts of Wales. Whilst our membership of specialist services covers the entirety of Wales, in rural parts of Wales, services are more likely to be further away from survivors, making it harder and more costly for them to access. This undoubtedly acts as a barrier to support, particularly for children and young people, disabled survivors, and older survivors.

We have previously highlighted⁷ that services are not funded consistently across all local authorities and while the Welsh Government's statutory guidance for the commissioning of VAWDASV services in Wales⁸ addresses this somewhat, it has not been updated in line with the new VAWDASV strategy and it is clear that regional variations in the commissioning of services still exist. Services are not funded consistently across all local authorities and the continued lack of a Wales-wide strategy makes it very difficult to identify gaps in provision.

One of the core aims of the VAWDASV (Wales) Act 2015 was to introduce a duty to implement local strategies to end the postcode lottery of services for survivors across Wales but this remains to be a problem, particularly for survivors in rural parts of Wales. We believe that clear funding in this draft budget to address regional disparities and guarantee parity of services provision across all local authorities in Wales is the only way to achieve Objective 6 of the VAWDASV strategy, which aims to provide all survivors with equal access to appropriately resourced, high-quality, needs-led, strengths-based, intersectional, and responsive services across Wales.

4. Are Welsh Government plans to build a greener economy clear and sufficiently ambitious? Do you think there is enough investment being targeted at tackling the climate change and nature emergency? Are there any potential skill gaps that need to be addressed to achieve these plans?

⁷ <https://welshwomensaid.org.uk/wp-content/uploads/2021/12/WWA-response-to-Welsh-Government-Budget-2022-23.pdf>

⁸ <https://www.gov.wales/sites/default/files/publications/2019-05/statutory-guidance-for-the-commissioning-of-vawdasv-services-in-wales.pdf>

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N/A

6. Is the Welsh Government using the financial mechanisms available to it around borrowing and taxation effectively?

N/A

7. The Committee would like to focus on a number of other specific areas in the scrutiny of the Budget. Do you have any specific comments on any of the areas identified below?

– Is enough being done to tackle the rising costs of living and support those people living in relative income poverty?

Lack of access to financial resources remains to be a barrier to escaping all forms of violence against women, and this is an increasing issue with the rising cost of living. In a recent report⁹, Women's Aid Federation of England showed that almost all survivors surveyed (96%) reported a negative impact on the money available to them as a result of cost-of-living increases, two thirds (66%) of survivors reported that abusers were using the cost-of-living crisis as a tool for coercive control, and almost three quarters (73%) of survivors with financial links to the abuser said the cost-of-living crisis had either prevented them from leaving or made it harder to leave.

Further, evidence¹⁰ shows that financial hardship remains to be a barrier when seeking refuge space. Many women either sofa surf or spend time in emergency accommodation such as B&Bs while waiting for a refuge space, and findings from the Women's Aid No Women Turned Away Project¹¹ show that a small but notable number of women resort to rough sleeping, many of whom experience additional danger or abuse as a by-product. Many women (15.1%) also reported not having the financial resources to pay for essentials such as food for themselves and their children, phone bills, and transportation whilst waiting for refuge space.

Consequently, we believe more must be done by Welsh Government to ensure survivors who are living in relative income poverty have access to independent financial resources to allow them to leave abusive relationships and live independently. This includes encouraging the UK Government to make the flee fund permanent and to set up a similar crisis fund to support survivors in Wales more broadly.

⁹ <https://www.womensaid.org.uk/the-cost-of-living/>

¹⁰ <https://www.womensaid.org.uk/wp-content/uploads/2022/03/Financial-Hardship-report-FINAL.pdf>

¹¹ <https://www.womensaid.org.uk/wp-content/uploads/2021/09/Nowhere-to-Turn-2021.pdf>





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– How could the budget further address gender inequality in areas such as healthcare, skills and employment?

As we have previously highlighted¹², all forms of VAWDASV are rooted in and are expressions of unequal gender relations in society. These intersect with other forms of oppression such as sexism, ableism, racism, homophobia and transphobia and other factors such as age, ethnicity, class, sexuality, and disability, meaning these women experience VAWDASV in different, often more severe ways.

Whilst we welcome the Minister for Social Justice's response¹³ to the Equality and Social Justice Committee's report on the Draft Budget 2023-24 which guaranteed protected funding to tackle VAWDASV, and an allocation of £130k to the VAWDASV BEL, we wish to highlight our concerns at the reduction in other related policy areas. As outlined above, we are disappointed in the overall decrease to the social justice budget and the reduction in the equality, inclusion, and human rights budget. Violence against women is an expression of gender inequality and approaches to tackling VAWG must be truly intersectional, so we are concerned at the reduction in funds to other related policy areas which have a knock-on impact.

Similarly, Welsh Women's Aid welcomed the establishment of the Migrant Victims of Abuse Support Fund pilot scheme¹⁴, delivered by Bawso, in the last year. However, we wish to express our concerns that dedicated funding for this has not been allocated. The Equality and Social Justice committee¹⁵ noted that the last resort fund will be delivered from the VAWDASV BEL, with no additional money being made available. Consequently, already-stretched specialist services continue to be expected to deliver more without the appropriate additional funding and we urge the Welsh Government to establish a specific, ring-fenced fund for this vital scheme, and to establish the fund on a permanent basis to properly tackle gender inequality within public services for *all* women, including migrant women who are also survivors of abuse.

We have previously highlighted that a mixture of factors such as the COVID-19 pandemic, Brexit and the ongoing cost-of-living crisis impacts women disproportionately. The Women's Budget Group¹⁶ have highlighted that increases in cost of living hit the poorest hardest, and with lower levels of wealth and savings and less capacity to increase these, women inevitably feel this more acutely. This has an impact on all forms of VAWDASV, particularly financial and economic abuse, which have increased since the onset

¹² <https://welshwomensaid.org.uk/wp-content/uploads/2022/12/WW267A1.pdf>

¹³ <https://senedd.wales/media/jxfdn0nh/cr-ld15648-e.pdf>

¹⁴ <https://www.gov.wales/written-statement-migrant-victim-abuse-support-fund-pilot>

¹⁵ <https://senedd.wales/media/jxfdn0nh/cr-ld15648-e.pdf>

¹⁶ <https://wbg.org.uk/wp-content/uploads/2022/03/The-gendered-impact-of-the-cost-of-living-crisis.pdf>

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of the cost-of-living crisis. The Welsh Government must directly consider ways in which the budget can address gender inequality in order to provide parity of outcomes for women, particularly those who are survivors of domestic abuse and sexual violence.

Relatedly, we believe that in order to properly tackle gender inequality, Welsh Government must fully commit to implementing gender budgeting as suggested in the Gender Equality Review. We welcome the progress made to date, but it remains too slow and must be implemented to ensure policy does not disproportionately impact women. We are particularly concerned at the recent news that leading gender equality charity Chwarae Teg will cease to operate, and we urge the Welsh government to redistribute funds to gender equality projects and to continuing the vital work that Chwarae Teg, alongside the Wales Women's Budget Group, were undertaking on gender budgeting.

– Is the Welsh Government's approach to preventative spending 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 referred to violence against women as a 'major public health problem and a violation of women's human rights'¹⁷.

Typically, strategies to prevent VAWDASV have focused on risk reduction, which is seen in the commissioning of services. Funders often look for novel, intervention-based approaches, with outcomes focusing on case load and risk reduction. Whilst we appreciate the need for these approaches for those that do come in to contact with specialist services, such funding should not come at the expense of a preventative approach because it does not tackle VAWG at its root cause. As outlined above, a public health approach which focuses on early intervention and prevention using the Change that Lasts approach is key to ensuring long-term change and the ultimate eradication of violence against women and girls.

We believe that the Welsh Government is making positive in-roads in terms of preventative spending, for example, by funding Ask and Act and Trusted Professional training, which aim to ensure that survivors receive helpful responses from the moment a disclosure is made. However, we believe this could be rolled out more widely to ensure that every interaction between survivors and the relevant professionals, such as staff in housing associations, GP surgeries, public transport, and food banks, counts and effective responses are guaranteed.

As highlighted in the question, not only does investing in early intervention prevent violence against women and girls from happening, it also saves public funds by reducing the pressure on public services.

¹⁷ <https://www.who.int/news-room/fact-sheets/detail/violence-against-women>





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Recent evidence¹⁸ from Women's Aid showed that every £1 invested in domestic abuse services represents a £9 saving to the public purse. Given that a mixture of increases in demand and escalating budget cuts means public services are stretched beyond their capacity, we believe that Welsh Government must do even more to prioritise spending on VAWDASV prevention.

– How should the Welsh Government explain its funding decisions, including how its spending contributes to addressing policy issues?

We believe that there is much for Welsh Government to work on with regards to transparency in funding decisions.

Firstly, it is imperative that in order to guarantee joined-up working, there is improved clarity of spending within specific business expense lines (BELs). Although the total amount of spend dedicated to VAWDASV is clear, it is hard to find further, more specific breakdowns of spend within strategic aims, so it is difficult for us to scrutinise whether budget is being allocated in the most effective manner. It is also not clear how funding decisions are made with regards to cross-directorate spending. VAWDASV is a national priority and requires joined up working across all BELS. It is clear that some of the work within the strategic priority is funded from multiple areas and where and where this is occurring could be much clearer.

Secondly, we believe there must be improved oversight of commissioning structures. We welcomed the publication of the Statutory Guidance for the Commissioning of VAWDASV Services¹⁹. However, since its publication in 2019, there have been no regular updates as to the impact of this guidance or future work around service commissioning. The Home Office National Statement of Expectations for VAWG Services²⁰ was updated in March 2022 and Welsh Government must make sure that sufficient funding is in place for Wales to align with this in order to ensure all local areas have sufficient, local, specialist VAWG provision, including specialist services for those who face the greatest barriers when accessing support as well as dedicated 'by and for' services.

Finally, there are a number of omissions at present. The Welsh Government must clearly set out how spending corresponds to all strands of the VAWDASV Strategy and what financial preparations are being made to develop the next strategy. Further, to our knowledge, no substantive progress has been made to ensure resilience within the sector. It is important to consider how such resilience will be demonstrated

¹⁸ https://www.womensaid.org.uk/wp-content/uploads/2023/02/Respublica_web.pdf

¹⁹ <https://www.gov.wales/sites/default/files/publications/2019-05/statutory-guidance-for-the-commissioning-of-vawdasv-services-in-wales.pdf>

²⁰ <https://www.gov.uk/government/publications/violence-against-women-and-girls-national-statement-of-expectations-and-commissioning-toolkit>

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in the face of, for example, further inflation, and what financial precautions Welsh Government are taking to ensure VAWDASV remains a financial and strategic priority in the face of these crises.

– How can the documentation provided by the Welsh Government alongside its Draft Budget be improved?

As outlined above.

– How should the Welsh Government prioritise its resources to tackle NHS waiting lists for planned and non-urgent NHS treatments. Do you think the Welsh Government has a robust plan to address this issue?

N/A

– Is the Welsh Government providing adequate support to the public sector to enable it to be innovative and forward looking through things like workforce planning.

A continued issue for specialist domestic abuse and sexual violence services is pay discrepancy between staff in statutory and non-statutory services. In our response to last year's call for evidence²¹, we highlighted the issue of staff retention for third sector specialist services and pay disparity, and the problem continues. Internal analysis conducted by Welsh Women's Aid has shown that, for example, the average salary for an IDVA/IPA in a specialist service is £22,770 whereas in a statutory service, this is £25,932. Given the tight budget constraints under which specialist services are working due to inadequate funding mechanisms, they have less flexibility to match wages or provide permanent contracts and they are losing experienced staff as a result. Further, cuts to local authority budgets mean core services are increasingly being provided by specialist, third sector services, but their funding is not increasing accordingly, which is further contributing to inequality in provision across different regions based on local strategic priorities.

Additionally, in a number of briefings made available to the Welsh Government, we have highlighted our concerns around the impact of the Renting Homes (Wales) Act and the consequences of this on staff time in both specialist services and local authorities. In a Local Government and Housing Committee Session²² on 16th November 2022, issues with high demand and staff turnover on local authority housing teams were highlighted, as well as the need to increase administrative capacity. The administrative load

²¹ <https://welshwomensaid.org.uk/wp-content/uploads/2022/12/WW267A1.pdf>

²² <https://record.senedd.wales/Committee/13040>





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accompanying the Renting Homes (Wales) Act will have further exacerbated this and has not been accompanied by sufficient resources for local authorities to increase their staff levels accordingly.

Finally, we wish to re-iterate our concerns around the focus on innovative support in this question, alongside the need to maintain consistent funding for core services across both the public and third sectors. Increasingly, specialist services are being required to enter competitive tender bids for funding to deliver novel programmes and interventions, and whilst we appreciate the importance of diverse programmes of support and piloting new approaches, this often leaves services less able to resource core services and share best practice based on common experiences and approaches. We believe such programmes must occur in addition to rather than in lieu of funding for tried and tested, evidence-based, core services from trusted providers.

Combined, we believe these examples show that Welsh Government is not providing adequate support to either the public or third sectors to allow for sufficient forward workforce planning.

– Has there been adequate investment from the Welsh Government in basic public sector infrastructure.

N/A

– Is there enough infrastructure investment targeted at young people?

In our previous responses to these calls for evidence we have highlighted the existing postcode lottery of specialist services for children and young people affected by VAWDASV across Wales. In our report, A Duty to Support²³, we found that despite roughly 1 in 5 children in Wales experiencing domestic abuse, only a small percentage receive support from specialist VAWDASV services, and only three out of 20 local authorities in Wales that responded to our freedom of information request had a designated children and young people scrutiny committee to examine the need for specialist support for children and young people.

Many of our member services deliver excellent support and intervention for children and young people affected by VAWDASV, however, many refuge services still have no dedicated funding for children and young people workers, where they do have children and young people workers, funding restrictions means they are paid substantially less than their counterparts in statutory services, and provision remains extremely limited in comparison to the scale of the population in terms of services' area coverage and the

²³ <https://welshwomensaid.org.uk/wp-content/uploads/2022/06/CYP-FOI-Report-ENG-WWA.pdf>





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prevalence of VAWDASV both directly perpetrated against children and young people and to which they are witness.

We appreciate the effort made in the recent VAWDASV strategy to acknowledge children and young people's needs, including the setting up of the children and young people workstream within the VAWDASV Blueprint approach and the research currently underway to understanding the existing evidence and provision available for children and young people²⁴. However, progress in this area is far too slow, particularly given we have previously highlighted many of the gaps in provision²⁵, and this work must be accompanied by strategic, ringfenced investment in support and services for children and young people.

– How is evidence and data driving Welsh Government priority-setting and budget allocations, and is this approach clear?

We wish to re-iterate our concerns around the many forms and manifestations of VAWDASV that still lack large-scale, robust evidence or data, particularly Wales-specific data, and we urge the Welsh Government to invest resource to understand the scale of these and allocate budgets accordingly.

These include, but are not limited to:

- Older people
- Children and young people, particularly surrounding child to adolescent parent violence and high-quality evidence centring the voice of children in Wales, particularly those with care experience
- Those with no recourse to public funds (NRPF)
- Sexual exploitation, particularly survivors of adult sexual exploitation (ASE). Notably, in a recent report²⁶ requested by the All-Wales Operational Group on Sexually-Exploited Women (AWOGSEW), convened by Welsh Women's Aid, freedom of information requests revealed that 75% of statutory agencies do not collect data on the number of adults who had experienced or were at risk of experiencing sexual exploitation. Where agencies did collect this data, it showed that between 2019 and 2022, 404 adults had been supported after experiencing sexual exploitation
- Communities in rural areas in Wales
- Protected characteristics, particularly the impact of VAWDASV and accessibility of support services for Deaf/disabled people, LGBTQ+ people and those from Black and minoritised communities
- Survivors who have experienced homelessness

²⁴ <https://www.gov.wales/progress-against-blueprint-high-level-action-plan-2023-html#132966>

²⁵ <https://welshwomensaid.org.uk/wp-content/uploads/2022/06/CYP-FOI-Report-ENG-WWA.pdf>

²⁶ <https://welshwomensaid.org.uk/wp-content/uploads/2023/11/Operational-Group-FOI-Report.pdf>

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- Speakers of other languages, particularly with regards to the investment needed to conduct high-quality research with interpreters and evidence that much of the terminology surrounding VAWDASV either does not translate directly or does not exist at all in many other languages

We acknowledge that the VAWDASV Blueprint workstreams are currently undertaking a number of mapping exercise to determine the evidence that exists and the support available, but we urge the Welsh Government to also commit funding to evidence areas where there are gaps in literature and provision, in order to ensure evidence-based and data-driven policy making across all areas.

– Is the support provided by the Welsh Government for third sector organisations, which face increased demand for services as a consequence of the cost of living crisis and the pandemic, sufficient?

No. As previously highlighted in other areas of this response, third sector domestic abuse and sexual violence services are facing increasing pressure in terms of both demand for services and increased costs while many aspects of their funding are remaining stagnant or seeing sub-inflationary increases. This means that services with increasingly diminishing reserves are continuously being asked to cover these bills while not being able to recoup costs.

We appreciate that the Welsh Government is operating in extremely difficult financial circumstances which have been compounded by over a decade of austerity and unforeseen economic events which have led to increasing cuts. However, it must be noted that specialist services have been underfunded for many years, since long before the COVID-19 pandemic, and the cumulative crises have simple exacerbated this situation.

It should also be noted that specialist services welcomed the additional funding provided by Welsh Government before during the pandemic and at the onset of the current cost-of-living crisis, however, the majority of services continue to see increase in demand despite the funding coming to an end. We urge Welsh Government to take learning from these crises and to develop a longer-term plan to sustainably and flexibly fund the sector to make it more resilient to changes in demand and future crises.

We also wish to express our concern around the logistic of funds provided from Welsh Government to specialist services. We have reports from a number of specialist services, including ourselves, of notable delays to grant payments and substantive payments being made in arrears, including for large-scale investments such as property. Where this happens, services have to use reserves to front-end payments which can limit their ability to fund core services, expand projects, and make long-term financial projections. We urge Welsh Government to immediately review their financial processes to ensure payments are made promptly and in advance.

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– What are the key opportunities for the Welsh Government to invest in supporting an economy and public services that better deliver against the well-being goals in the Wellbeing of Future Generations Act?

We believe the Welsh Government is at a critical time in their work to prevent all forms of violence against women and children and we have a number of key recommendations to help them better deliver against the VAWDASV National Indicators and the Wellbeing of Future Generations Act:

1. Commit to ensuring VAWDASV as a national priority, embedding intervention and prevention for all survivors across all directorates. This includes updating the National Indicators, as promised, to properly evaluate the impact of policy and funding choices.
2. Ensure funding for the VAWDASV sector is sustainable and contains ringfenced funding for specialist and 'by and for' organisations. This includes commitment to longer funding cycles, of a minimum 3-5 years.
3. Commit to inflation-linked funding for specialist services to ensure basic amenities can be covered.
4. Provide funding for specialist services that enable them to offer parity of employment conditions as those in statutory roles.
5. Commit to funds within contracts for specialist services dedicated to staff development and wellbeing.
6. Develop a funding system that reduces time-consuming and competitive tendering and focuses on genuine collaboration.
7. Increase the availability of varied flexible accommodation and support for survivors.
8. Increase the availability of all support services, particularly those for migrant survivors, children and young people, older people, and survivors of sexual exploitation.
9. Commit ringfenced funding for a multi-tier of accredited perpetrator interventions.
10. Make the Welsh Government Migrant Victim of Abuse Support Fund permanent and provide ring-fenced funding within the budget for this.
11. Focus on funding core, evidence-based, tried-and-tested services as well as innovative programmes of support.
12. Expand funding for early intervention and prevention.
13. Ensure dedicated children and young people workers in both refuge and community services are available 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.

All of these require properly funded, sustainably commissioned specialist services and we urge Welsh Government to take this opportunity to develop a progressive budget, committed to equality and making Wales free from all forms of gender-based violence.

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