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Betsi Cadwaladr
University Health Board

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University Health Board
Ysbyty Gwynedd Ffordd Penrhos, Bangor
Gwynedd LL57 2PW

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GBV 02

Communities, Equality and Local
Government Committee
Gender-based Violence, Domestic Abuse
and Sexual Violence (Wales) Bill : Stage 1
Response: Betsi Cadwaladr University
Health Board

Dear Sirs,

Re: Betsi Cadwaladr University Health Board Response: Consultation: Gender Based Violence, Domestic Abuse and Sexual Violence (Wales) Bill

On behalf of Betsi Cadwaladr University Health Board, thank you for the opportunity to contribute to the enquiry. The Health Board fully supports the principles of the Bill and wishes to make the following observations;

1. The guidance that is to be issued by the Welsh Ministers could be strengthened by a requirement for all public services to align standards associated with the Bill to existing (and emerging) Health & Social Care Standards. The issues arising from Gender Based Violence, Domestic Abuse and Sexual Violence must be seen as being of the same significance as Child Protection and Adult Protection issues.
2. In terms of consistency, whilst it is extremely beneficial to prepare & publish joint local strategies for tackling gender based violence, domestic abuse & sexual violence the guidance needs to ensure that regional leads are identified within Safeguarding Boards (Adults & Children). For Health Boards/public services that are working across a number of LA areas it is already apparent that "thresholds" for child protection and adult protection are inconsistent. Identifying a LA Corporate director that ensures consistency across all LA's in the region would help overcome some of the challenges facing external agencies.
3. There needs to be ongoing engagement/consultation with the main regulatory bodies in Health that work pan UK. GMC is acknowledged in the consultation distribution list but this needs to be widened to incorporate NMC and other professional bodies that have a "Code of Conduct". Test cases in BCUHB have identified those health professionals that hold a professional registration will seek advice and support from unions, regulatory bodies & legal and risk services if they are not confident in the advice being given to them from within the organisation. Breaching confidentiality & professional codes is seen as a main concern & major challenge – it is absolutely imperative that these bodies are approached and consulted with ahead of the guidance being issued to ensure that any advice/support that is offered to practitioners by such bodies is consistent, clear and in line with what is



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happening in Wales particularly when posts such as the Anti Human Trafficking Coordinator and proposed Ministerial Adviser are the first of this kind in the UK.

4. The training framework needs to consider & consult with other areas of safeguarding that are under the auspices of Welsh Government to ensure that all mandatory requirements for health and social care are achievable & consistent (All Wales Safeguarding Children, All Wales POVA).

5. "Relevant Professionals" consideration should be given to including CAMHS, staff working in Minor Injury Units, School Nursing. Paramedics are professional roles within Welsh Ambulance Service NHS Trust not Local Health Boards.

6. It may be helpful to undertake a scoping exercise to establish existing training packages across Wales – BCUHB have an existing e-learning (Level 1) & Face to Face Level 2 training package in relation to Domestic Abuse, FGM.

7. With regard to the need to provide better training for GPs, adequate and appropriate funding will need to be identified to support this. It will need to be locally based training, and will need not just funding for training but also funding for any backfill etc

Yours sincerely,

Grace Lewis-Parry.

Grace Lewis-Parry
Director of Governance & Communications