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Dyfed-Powys Police and Crime Commissioner,
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**COMISIYNYDD
HEDDLU A THROSEDDU
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POLICE AND CRIME
COMMISSIONER**

GBV 22

Communities, Equality and Local Government Committee
Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill: Stage 1
Response from: Dyfed-Powys Police and Crime Commissioner

Christine Chapman AM

Chair of the Communities, Equality and
Local Government Committee of the National Assembly for Wales.

CELG.committee@wales.gov.uk

04 September 2014

Dear Christine Chapman AM,

I write in respect to your consultation on the Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill.

On the whole the duties that the Bill proposes for local authorities and Local Health Boards are to be welcomed. However, the key to sustained success will be in ensuring that the work is linked to policing priorities and policing resources. It may be possible to ensure such linkages via Public Service Boards given that they will include representation from Police and Crime Commissioners and Chief Constables. It would be impactful if devolved areas such as housing, education and health were to have as strong a focus on Domestic Abuse and Sexual Violence as already exists in policing but it needs to be done in partnership, with referral mechanisms and care pathways aligned between all agencies. I have significant concerns that new arrangements will be established purely to tick the legislative box when existing informal arrangements may already work well in local areas and have the capacity to be further strengthened and improved.

A National Training Framework would be helpful in terms of providing a consistent approach amongst frontline professionals – Health staff in particular are in need of the training in order to enable the 'Ask and Act' approach to be embedded. However, the training needs to be meaningful at a local level and ensure that the necessary pathways and support services are in place so that victims can be immediately supported and signposted to the correct services once issues are identified. This is where the role of Police and Crime Commissioners (PCC's) becomes pivotal. Given our statutory responsibility for victims of crimes – and gender based abuse, domestic abuse and sexual violence are all crimes – PCC's should be at the centre of both strategic and local commissioning decisions. We are able to align capacity to need and to act quickly and decisively, both in terms of changing policing priorities where necessary and in terms of commissioning support services. This ability is demonstrated by two recent examples in relation to domestic abuse and sexual violence. Historically in Dyfed Powys the specialist response to victims of domestic abuse (IDVA's) were funded by the Home Office and Welsh Government. Funding was piecemeal and on an annual basis. This led to 3.5 FTE IDVA's for the whole of Dyfed Powys (which covers 52% of the land mass of Wales). Consistent specialist advice recommended the equivalent of 10 FTE IDVA's, yet this advice was ignored. As PCC I was able to assess the need and commission appropriate IDVA support to the recommended level, thereby providing direct support and advice to victims of gender based abuse and domestic abuse. I was also able to secure funding for

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the provision of two additional Sexual Assault and Rape Centres (SARCs) across Dyfed Powys, thereby providing specialist support to victims of sexual violence. It is unclear in the proposed Bill whether funding will be made available to Local Authorities/Health Boards for such specialist provision. It is critical that the National Assembly of Wales consults effectively with PCC's to ensure that there is no duplication of funding, and that resources are aligned to deliver local and targeted support and best value for money.

I have reservations in respect of the post of Ministerial Advisor. It is unclear to me what value the role will actually add. The indicative cost of £600,000 per annum seems disproportionate. This money would be far better committed to local service provision to ensure frontline access for as many victims as possible. There is an opportunity for all funding streams in respect of domestic abuse and sexual violence, devolved and non-devolved, to be aligned to achieve better outcomes for victims. There is an opportunity to align strategies and resources, devolved and non-devolved, to deliver local support mechanisms in respect of gender based violence, domestic abuse and sexual violence that are sustainable, accessible and effective. The proposed Bill focuses too much on structures and does not grasp those opportunities.

Yours sincerely

Christopher Salmon
Comisiynydd Heddlu a Throseddu