

GBV 50

Communities, Equality and Local Government Committee

Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill : Stage 1

Response from: Citizens Advice Cymru

# Citizens Advice Cymru Evidence on the Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill

*For: Communities, Equality and Local Government Committee*

## About Citizens Advice Cymru

Citizens Advice is an independent charity covering England and Wales operating as Citizens Advice Cymru in Wales with offices in Cardiff and Rhyl. There are 20 member Citizen Advice Bureaux in Wales who are members of Citizens Advice Cymru, delivering services from over 375 locations.

The twin aims of the Citizens Advice service are:

- to provide the advice people need for the problems they face
- to improve the policies and practices that affect people's lives.

The advice provided by the Citizens Advice service is free, independent, confidential and impartial, and available to everyone.

The majority of Citizens Advice services staff are trained volunteers. All advice staff, whether paid or volunteer, are trained in advice giving skills and have regular updates on topic-specific training and access to topic-based specialist support.

Local bureaux, under the terms of membership of Citizens Advice provide core advice based on a certificate of quality standards on welfare benefits/tax credits, debt, housing, financial products and services, consumer issues, employment, discrimination, health, immigration and asylum, legal issues, and relationships and family matters.

The Citizens Advice service now has responsibilities for consumer representation in Wales as a result of the UK Government's changes to the consumer landscape<sup>1</sup>. From 1 April 2014 this includes statutory functions and responsibilities to represent post and energy consumers.

We are happy for our evidence to be made available to the public.

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## Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill

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Citizens Advice Cymru welcomes the Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill and the gender neutral naming of the Bill. We support the policy intent of improving the Public Sector response in Wales to gender-based violence, domestic abuse and sexual violence and believe the Bill offers a significant opportunity for Wales to lead the way in the UK in reducing and preventing domestic violence and abuse, and strengthening the support available to victims.

We also welcome the Bill's intent of placing duties on public bodies to create and monitor a strategic gender violence and abuse (referred to as GVA throughout this document) plan, increasing the organisational focus and accountability on this issue. We believe the third sector has an active role to play in the development and delivery of these action plans, and anticipate bureau involvement. We ask that the guidance developed considers the networked approach to free advice provision in line with the Welsh Government's Advice Services review.

We support the Welsh Government's ongoing commitment to equality and believe that raising awareness and understanding of GVA and its effect on both individuals and our communities will be beneficial to promoting a better society by making support to victims more visible and accessible, and GVA less socially acceptable. In order for the Bill to make significant contribution to achieving this, it is vital that adequate resourcing is given to support its delivery to ensure that GVA victims are able to access the information, advice, guidance, support and services they are entitled to and need.

Citizens Advice Cymru believes free appropriate and impartial advice makes society better and that organisations must be supported to continue to offer free advice, through a range of channels<sup>2</sup>, so it

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<sup>1</sup> On 1<sup>st</sup> April 2013 responsibility for consumer representation was transferred from Consumer Focus to the Citizens Advice Service (including Citizens Advice Cymru) following the UK Government's review of the consumer landscape.

is available to everyone who needs it, when they need it. This is vital to help people make complex decisions about the problems they face and have the confidence and opportunity to act on the issues that concern them.

Citizens Advice Cymru calls for:

- The guidance to recommend that all those contracted to deliver services by the public sector are:
  - Trained to ensure their working practices with those who have experienced GVA is appropriate.
  - Encouraged, through promotion of model policies, to develop GVA policies in support of their workforces and volunteers.
- Strong leadership from Welsh Government to ensure appropriate engagement of non-devolved public sector bodies with the Bill, from the design and implementation of the national and local strategies, to ensuring training is available to all public sector staff delivering services in Wales.
- Assurance from Welsh Government that:
  - Support services will be adequately resourced to manage any increase in the identification of GVA victims seeking further information, advice, guidance and support as a result of the Bill.
  - The outcomes of the curriculum review will adequately reflect and meet the need for domestic violence and abuse education, inclusive of financial abuse.

### ***National Training Framework: ASK and ACT***

Citizens Advice Cymru welcomes the proposals in the National Training Framework and believes the impact will be far reaching and in the longer term, provide economic benefit to Wales through tackling GVA. We believe the level of detailed evidence within the additional documents prepared for the Bill will be helpful in enabling services to learn and develop their responses to tackle GVA in Wales.

From our internal research on GVA (please see below for further details) we would call for the guidance to go further and recommend that Local Authorities are required to offer level 2 training to all staff providing information, advice or guidance in the areas of welfare benefits, debt, financial inclusion, tenancy support, and independent living. In a similar manner, we would recommend that the guidance ensures service providers working in these areas on behalf of public bodies also undertake level 2 training. We believe that over time widening participation of professionals through guidance and local strategies will help break down the secrecy and shame associated with GVA.

We welcome the proposed approach that other organisations, including those in the third sector will be able to access the resources in order to raise their awareness of GVA and develop appropriate responses. As we are also currently developing e-learning and other resources on GVA to support the roll out of ASK Routine Enquiry within our services (please see below for further details), we would be grateful of the opportunity to share learning with Welsh Government, including evaluation of these new resources, to ensure best practice development. We would ask that it is made clear whether the training is free for participants, and if the cost of time of the nominated professionals acting as trainers will be covered by Welsh Government funding.

As noted within this evidence, Citizens Advice are moving towards ASKing about GVA as a routine enquiry within the advice process. ASK and ACT recommends that people are only ASKed as a targeted enquiry. We are developing the approach of ASKing all clients whether or not there are signs of GVA, as this raises awareness of the issue, as well as enabling the opportunity for disclosure

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<sup>2</sup> Channels refer to the method of delivering advice, e.g. face to face, telephone and online

by people who may not be exhibiting signs, symptoms or cues. We ask short, simple direct questions as recommended by GVA specialists and piloted with advisors and clients. The suggested questions within the ASK and ACT document are quite long and complex in structure, therefore we would welcome the opportunity to review the research and evidence that lead to these being recommended in order to ensure our service is based on best practice.

In our experience and as highlighted within the ASK and ACT document, the signs of physical or sexual abuse are more likely to be seen or easily recognisable than for individuals experiencing financial abuse, where the signs may not be physically apparent. As noted within research<sup>3</sup>, the majority of GVA victims experience many controlling tactics, with financial abuse being most prominent, yet it remains less researched and understood<sup>4</sup>. Citizens Advice is currently undertaking a national research project aiming to map and understand: our clients' experience of financial abuse; how advisers see and address this; and what interventions may work to improve our clients' situations. We are working to analyse existing bureaux evidence as well as gathering new data, and will be reporting on this at the beginning of 2015.

From our initial research we believe that it would be beneficial to include a greater level of detail and examples of non-physical and non-sexual related abuse within the ASK and ACT document. In particular, we believe information and training about financial abuse and its signs, such as unexplained financial hardship or indebtedness, should be included given its prevalence amongst victims of domestic abuse. This would help ensure public sector workers, and those working on their behalf, are able to identify this form of domestic abuse and support those affected by it.

Citizens Advice Cymru calls for:

- The National Training Frameworks level 1 'Awareness Raising' resources to be made freely available to all public sector contractors and service providers to ensure consistent messaging.
  - Where appropriate, for public sector contractors to be required to undertake level 2 training in mixed organisational environments to support multi-agency collaboration.
- Training to be free for all participants and for the cost of time of the nominated professionals acting as trainers will be covered by Welsh Government funding.
- Greater level of detail and examples of non-physical and non- sexual related abuse both within the ASK and ACT document and the training resources developed to implement the National Training Framework.

In addition, Citizens Advice Cymru would welcome the opportunity to:

- Review the research and evidence used to develop ASK and ACT in order to ensure our service is based on best practice.
- Support the development of further information on financial abuse within the National Training Framework and ASK and ACT documentation.

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<sup>3</sup> Stark, E (2007) *Coercive Control: How Men Entrap Women in Personal Life*, Oxford: Oxford University Press.

<sup>4</sup> Sharpe, N (2008) *'What's yours is mine' The different forms of economic abuse and its impact on women and children experiencing domestic violence*, London: Refuge

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## Gender-based Violence and Abuse: Our Approach

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### **Terminology**

Citizens Advice welcomes the Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill. We support the policy intent of improving the Public Sector response in Wales to gender-based violence, domestic abuse and sexual violence and believe the Bill offers a significant opportunity for Wales to lead the way in the UK in reducing and preventing domestic violence and abuse, and strengthening the support to victims.

Citizens Advice, like the Welsh Government use the term 'gender violence and abuse' and support the gender neutral naming of the Bill.

We use GVA is an alternative term to Violence Against Women and Girls, to describe a range of violence types that are typically rooted in beliefs about how men and women should behave, particularly within relationship and family type settings. GVA therefore encompasses domestic violence and abuse, sexual violence, female genital mutilation, honour based violence, rape, stalking, harassment and trafficking. The term GVDA or GVA also ensures we are inclusive of violence and abuse against men and boys. While using the gender neutral terminology of GVA, Citizens Advice recognises that women are disproportionately impacted upon by all forms of intimate violence.

The wider term is also used within our recording codes and elsewhere in recognition of the fact that bureau help clients on all those issues. For bureaux domestic abuse and/or violence is the gender violence and abuse issue that they most frequently advise on and help with.

### **Supporting Staff and Volunteers**

Citizens Advice operates an internal policy to support staff who are victims of GVA. This has been in operation since 2008 and is available as a model policy for all member bureaux to adopt. In addition to the policy, further support is made available to staff via the Citizens Advice Employee Assistance Programme, HM Assist, which gives all employees of Citizens Advice immediate access to a professional and completely confidential counselling, financial and legal advisory service.

As seen by the adoption of model staff policies by Local Authorities across Wales, having a clear strategic lead can result in swift action. We would welcome further encouragement and promotion of the use of these policies from Welsh Government for all organisations in Wales.

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## Tackling Gender-based Violence and Abuse: An Equality Approach

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Our equality and diversity strategy '[Stand up for equality](#)' (2012-15), states that equality and quality go hand in hand. This is based on a growing body of external evidence that focusing on equality brings business benefits, not just related to fulfilling equality objectives, but also to achieving wider improvements in services, organisational culture and effectiveness. Citizens Advice's experience of implementing previous equality strategies confirms that they improve our employment practice, our advice giving processes, and access and outcomes for clients; and give weight to our policy and campaigns work. In '[Stand up for Equality](#)', the three target areas for action are:

1. **Challenge discrimination through advice**
2. **Promote equality through advocacy**
3. **Value diversity through our roles of employer, volunteer agency and contractor**

Within target area one '*Challenge discrimination through advice*', gender based violence was identified as an area for action. This was due to internal research indicating that discrimination, hate and gender violence are often hidden and inter-linked issues that underlie clients' presenting problems seen at bureaux. Similarly, given that every year, at least one in eight women experience domestic abuse, Citizens Advice should expect to see around 150,000 of our women clients per year potentially experiencing domestic abuse. In particular, bureaux support many thousands of women (and men) with debt or mental health problems – both closely correlated with the incidence of domestic abuse. However, the level of recorded incidences of domestic abuse across England and Wales has remained relatively static for the past five years, varying from 12,000 to 13,000 (of whom approximately 85% are women).

### **ASK Routine Enquiry Pilot and Phased Roll Out Within Citizens Advice**

In order to take forward the identified target area of GVA, Citizens Advice ran the 'ASK routine enquiry' pilot project in 2013. Nine bureaux were involved from across the network, including two in Wales. The rationale for the pilot project was that:

- Research indicates that victims and survivors of GVA, including domestic abuse, are more likely to disclose abusive experiences if they are ASKed.
- The experience of GVA is likely to exacerbate those enquiries that clients initially seek help with, thereby enabling bureaux advisers to provide the most relevant information and advice options.
- Analysis of our internal case work on gender violence shows that our clients need bureaux to play a policy role in getting police, housing and other authorities to take gender violence seriously and respond appropriately.
- By ASKing the routine enquiry about GVA this could be the first step towards breaking the secrecy surrounding GVA.

The ASK pilot was developed by colleagues from Citizens Advice and bureaux (some with significant experience of GVA, some with very little in order to get a rounder perspective), Women's Aid and the organisation Against Violence and Abuse (AVA) and Respect, an organisation that works with male victims and perpetrators. In order to make it more manageable for bureaux the project initially focused on two areas of advice, rather than on every client. The areas were debt and housing, but were later expanded to include benefits advice. ASK used a number of different questions, such as '*Would you feel safe discussing this at home?*', as well as more direct questions as part of the advice process to give clients an opportunity to disclose abuse fairly early in the advice process.

The independent evaluation of the pilot found that ASK was '*a bold and ground breaking initiative that worked...project outcomes were overwhelmingly positive...it should be replicated nationally*'. The main findings from the project were that:

- out of a total of 413 ASKed clients 112 or 27% of clients disclosed past or current GVA in response to routine enquiry (5 of these were men and 107 were women)
- 7% of these clients were currently experiencing GVA
- 20% disclosed past GVA
- although the majority of disclosures concerned domestic violence and abuse, clients also disclosed stalking, forced marriage and "honour" based violence
- 1 client disclosed perpetrating domestic violence/abuse
- 6 clients (1.4%) declined to answer the ASK RE question

Due to success of the project, Citizens Advice Executive Team and Trustee Board agreed that ASK routine enquiry (RE) will be rolled out across England and Wales, starting with a voluntary early adopter phase in 2013/14.

During the voluntary phase, all men and women *face-to-face* clients with debt and benefits enquiries will be asked a ***routine question*** about whether they are experiencing GVA, including domestic abuse, or have in the past. Bureaux will be trained and supported to provide appropriate support and advice to clients arising from any disclosure.

The initial focus is on clients with debt and benefits enquiries because of the strong link between money problems and GVA, as well as the potential impact of the introduction of the single household payment through Universal credit.

Then over a period of several years (2015-18) the service will move – in phases that allow for further testing, development, and a flexible approach - to the position where ASK RE will be used with all clients with ***debt and benefit enquiries in all bureaux across the network and across all access channels***. Initially ASK RE will only be used in face to face Gateway<sup>5</sup> and advice sessions, but later the service will pilot and evaluate using ASK RE using other channels, such as the phone from 2016. It is then proposed that between 2019- 2021 the service will move to using ASK RE in ***all enquiry areas in all bureaux across England and Wales***.

Citizens Advice Cymru are looking to encourage and support all bureaux in Wales to become early adopters in recognition of the Bill. At the time of writing 6 bureaux have signed up to become involved in this phase of the roll out of ASK.

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## Gender-based Violence and Abuse: Statistics

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### ***Citizens Advice Statistics***

All Citizens Advice bureaux record their clients on a single database. Within bureaux there will be a single client record for individual clients, however often they return. The client record contains profile information on age, gender, ethnicity and disability, and other characteristics, including local authority and ward. Each interaction with a client (called a contact) is recorded within an individual enquiry, so an enquiry may consist of a single contact where straightforward advice is given, or multiple contacts for a complex on-going case. Within the enquiry, codes for 'advice issues' are recorded reflecting all the problems on which the client is being advised within that enquiry. **A single enquiry may have multiple advice issues attached to it, so multiple issues can be associated with a client.**

Across England and Wales Citizens Advice supports between 12,000 and 13,000 people about domestic abuse a year, around 11,000 of whom are women and 2,000 men. This level has been relatively static for the past 5 years, equating to approximately 3% of all client enquiries per annum.

[Information is available on our public facing website](#) covering different forms of GVA and the options available to victims, as well as detailing organisations that provide specialist information and support. For our advisors, and all those who purchase our AdviserNet resource<sup>6</sup>, further information is available on GVA. This is designed to support them in identifying GVA and asking appropriate questions to gather information in order to examine the options available with the client and plan their next steps.

### ***Citizens Advice Cymru Statistics***

In 2013/14 more than 134,000 people came to Welsh bureaux for advice on over 337,000 issues, with many more using our online services. Within Wales, bureaux recorded 325 unique clients with 418 issues relating to domestic abuse. Of the 325 clients assisted on issues of domestic abuse by

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<sup>5</sup> A Gateway assessment is a basic fact-finding interview to identify what service the client needs, any action that needs to be taken straight away, and next steps.

<sup>6</sup> AdviserNet is used by other independent advice providers and Local Authorities

bureaux, 84% were female and 16% male. On average the gender split between female and male clients seen by Welsh bureaux is 55% female to 45% male. This difference therefore reflects the national trend where significantly more women are victims of domestic violence and abuse than men.

The types of issues the clients presented with are broken down as follows:

Issue Type	Number of Advice Issues	Unique Client Count
Housing (actual and threatened) as a result of GVA	30	30
GVA	388	306
<b>Grand Total</b>	<b>418</b>	<b>325<sup>7</sup></b>

Citizens Advice Cymru acknowledge that the number of clients recorded as having experienced domestic abuse at 325 does not statistically reflect the known level of prevalence within the general population, with reference to the work undertaken by Robinson et al<sup>8</sup> using disaggregated data for Wales of the most recent British Crime Survey<sup>9</sup> data (2011/12). This showed women experienced twice the levels of ‘any domestic abuse’ (11.1% compared to 5.1% for men) and would indicate that the bureaux could expect to have seen in the region of up to 10,000 clients who were potentially experiencing domestic abuse in Wales. Reporting over the past three years shows that domestic violence makes up, on average, 3% of all relationship issues and 0.13% of total enquiry types across Wales. The low level of clients recorded with domestic abuse as an issue for them is further explored in the following section.

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## Citizens Advice Bureaux Network in Wales

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### *Evidence: Practice in Wales*

In order to understand how Citizens Advice support clients presenting with problems relating to GVA in Wales, we conducted a short survey with the 20 Welsh bureaux. At the time of writing we had responses from 15 bureaux. Our findings from those bureaux that responded to the survey show:

- 4 bureaux provide outreach in their local GVA organisation(s) office and/or refuge
  - A further bureau is currently in the process of establishing outreach with their local GVA organisation, and several had previously run outreach but replaced this with a fast track referral process due to low numbers requiring support at the outreach sessions
- 12 bureaux have established referral procedures to send and receive clients from their local GVA organisation(s)
- All bureaux have established processes in place for advisors to follow if a client is identified as being at risk from domestic abuse and are clear that advisors should seek support and guidance from their supervisor to establish the client’s options and ensure their safety.

9 bureaux have long standing working relationships with their local GVA specialist organisation. These bureaux commented on that the positive relationship enables them to make and receive quick, timely and accurate referrals, ensuring the client can access the support, information and advice that they need. Where partnership had been established for a number of years, attendance by both parties at

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<sup>7</sup> Please note the difference in numbers indicates where the clients was recorded as having both domestic abuse and housing enquiries.

<sup>8</sup> Robinson, Brisbane, Farrar, Hardy, Jones, Pickles and Shepherd, *The Welsh Government’s proposed ‘Ending Violence Against Women and Domestic Abuse (Wales) Bill’: Recommendations from the Task and Finish Group 2012.*

<sup>9</sup> The British Crime Survey has now become the Crime Survey for England and Wales (CSEW)



one another's meetings and training sessions was common, leading to a greater understanding of one another's work, their capacity and capability to respond to all individuals seeking support.

Examples of this partnership approach can be seen in Cardiff and the Vale Citizens Advice Bureau (CAB) whose partnership with Cardiff Women's Aid has led to debt and benefits clinics being delivered on their site, as well as participation in regular meetings Cardiff Women's Aid hold with partner agencies. Whilst in Torfaen, Citizens Advice run generalist advice drop-in outreach sessions in both Torfaen's Women's Aid and Hafan Cymru sites, and have done for the past 5 years. The lead supervisor for this work in Torfaen undertook the specialist Domestic Abuse Counselling Course alongside Women's Aid staff and participates in the Torfaen Voluntary Alliance coordinated central referral system for domestic abuse. This system ensures that the right specialist organisation responds to individuals' needs to resolve their issues, and where one or more organisation needs to be involved, that they are working together to reach the best outcome for the person concerned.

We found that no bureaux were asked to report GVA figures to their funders, nor were any aware whether their Single Integrated Plan (SIP) had reference to tackling domestic abuse as a priority. We therefore welcome the Bill's intent of placing duties for public bodies to create and monitor a strategic GVA plan, increasing the organisational focus and accountability on addressing this issue. We anticipate bureaux involvement in the delivery of these strategic plans through identifying clients at risk of, or experiencing domestic abuse, and providing relevant responses to their situations, such as providing welfare benefit and debt advice, referring or sign-posting on to specialist organisations.

In order to explore the significant gap between the number of clients recorded as experiencing GVA and the statistical prevalence within the population as a whole, we also sought further information from bureaux on recording. Anecdotal evidence consistently suggested:

- As a generalist and holistic advice service, our clients rarely present with a GVA enquiry as the main issue they are seeking advice for. GVA is more likely to be identified as an underlying issue during the advice process that either contributes to, or is as a consequence of the main presenting advice issue.
- Outreach advice sessions in GVA specialist organisations record the clients issue Citizens Advice is helping them to resolve, e.g. debt or benefit issues. GVA would not be recorded against the client's record, nor the outreach location.

We at Citizens Advice Cymru are actively seeking ways to support our members to improve their identification of clients experiencing GVA and accurately recording this. Through closer examination of our internal processes we have issued new guidance to advisors on recording clients who have experienced GVA which should in time lead to more accurate recording and a greater body of knowledge within Citizens Advice relating to this area of our work.

Anecdotal evidence gathered from interviews and group discussion with frontline generalist and specialist advisors (paid and voluntary) indicated that Citizens Advice is not seen as a specialist GVA organisation, therefore on top of existing known barriers to disclosure, our clients may not see us as being able to help them with GVA. We believe this will change as a result of the National Training Framework's implementation as more organisations become aware of GVA, identify victims and provide them with information, advice, and guidance, as well as signposting them to appropriate agencies for further support, such as Citizens Advice. We know Citizens Advice bureaux are viewed as locally placed, trusted organisations<sup>10</sup> and believe that through our internal work and the work of the Bill, that overtime bureaux will be viewed as being an organisation able to help victims of GVA. As stated previously, Citizens Advice Cymru are actively encouraging all bureaux in Wales to become early adopters of ASK Routine Enquiry. Further to this work, we are committed to increasing knowledge and awareness of GVA through the provision of targeted information for bureaux that summarises the resources available to advisors.

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<sup>10</sup> 76% of people trust the Citizens Advice service to provide free advice that is truly independent and impartial nfpSynergy, *Brand Attributes survey*, 2010

Anecdotal evidence also indicated that clients who had previously experienced GVA were seen more frequently by specialist debt and benefit advice workers and:

- In debt cases, the anecdotal evidence suggests that clients were seeking help with debt either due to: having no income for a period of time as a result of fleeing GVA; or due to accruing debt as a result of their abusive relationship.
- In benefit cases, the anecdotal evidence suggests that clients' mental health problems were related to past GVA experiences linking to their benefit entitlement claim, and/or affecting their ability to retain their benefits.

This supports the internal analysis of case work on GVA undertaken prior to the ASK project and the initial research by Citizens Advice into our clients' experience of financial abuse.

## **Evidence: Case Histories**

In addition to our statistical recording of client problems, Citizens Advice have a bureaux evidence retrieval tool which stores more detailed stories recorded by advisors on defective legislation, maladministration and discrimination. Bureaux use the tool to highlight cases of concern for social policy review, therefore are recorded as representative of wider problems or of issues of particular concern due to the individuals circumstances.

Using this system correlating factors were identified across the range of issues related to domestic violence and abuse. While the issues identified were varied in nature, the reported effects were predominantly financial hardship and concerns about client confidentiality. The case studies consistently showed the client's problems were caused by representatives of public and private institutions showing a lack of understanding or empathy of the client's situation. Through rigid interpretation of policy, the institutions increased the client's financial hardship. This is demonstrated in the case study below. It should also be noted that in cases where the client was still experiencing domestic violence, steps were rarely taken by the institutions to help the client get the support they were entitled to and needed.

### **Case Study**

In 2012, Cardiff and Vale bureau recorded the case of a young single mother of one, suffering from depression and anxiety as a result of her abuse. She did not have any money to buy food for her and her son as her Employment and Support Allowance (ESA) had been stopped. Her ESA was stopped by DWP for non-attendance at her medical review, which she stated was due to her level of fear and anxiety at attending new venues and in areas (e.g. the town centre) where she could see the perpetrator of her abuse. She had previously notified her inability to attend and fear associated with the appointment, but no alternatives were offered to her, resulting in her benefit being stopped.

The bureau were able to issue the woman with a food voucher to address her immediate problem and began welfare benefit case work to resolve the issue to ensure her benefit was reinstated, with payments backdated.

These issues could be addressed through training and awareness raising. Through gaining a better understanding, the representatives involved could develop greater insight into the client's circumstances, enabling them to seek further information, advice and guidance to support the client. This would enable the representatives to take positive steps to assist the client, such as: referring them on to a relevant specialist organisation; or seeking further guidance as to whether the extenuating circumstances could affect the interpretation of the policy in question.

Citizens Advice Cymru therefore are strongly supportive of the Bill's policy aims of raising awareness and understanding through the National Training Framework and Public sector duties. We believe that these measures could go towards preventing the identified issues from happening to people in the future. We note however, that many of cases recorded highlight the practice of non-devolved public bodies (primarily DWP and HMRC) which had a detrimental effect on the client. Therefore ensuring non-devolved public bodies are engaged the multi-agency collaboration approach across all levels will also be necessary to resolve people's problems. We would welcome strong leadership from Welsh Government to ensure appropriate engagement of non-devolved public sector bodies with the Bill, from the design and implementation of the national and local strategies to ensuring training is available to staff delivering services in Wales.

The case study below highlights how well informed and trained public sector staff are able to help those in vulnerable situations as a result of their domestic abuse. It also highlights how important it is that those contracted to deliver services by the public sector will need to engage with the awareness raising and training promoted by the Bill to ensure vulnerable people are treated appropriately. As noted earlier, Citizens Advice Cymru recommend that the National Training Frameworks level 1 'Awareness Raising' is made available to all public sector contractors. Further, we call for a requirement for all contractors to have appropriate training and to work with those who have experienced GVA in an appropriate manner to be included within the public sector guidance.

### Case Study

In 2011, Torfaen bureau recorded in Cwmbran the case of a young single mother of one who fled domestic violence and now lives in social housing after receiving emergency assistance from Torfaen's Women's Aid. Her violent ex-partner had forced her to put all the household bills in her name, including Council Tax (although this is a joint liability) and debts were accrued. The client remained in the area and is in receipt of benefits, enabling her to be located for the Council Tax debt. The ex-partner left the area and cannot be located for his contributions. The council tax debt received a liability order resulting in bailiff's being appointed. The bailiffs threatened to attend the client's home and remove the child's clothing and furniture causing considerable distress to the vulnerable young woman who stated she was scared of be at home on her own. The client stated her attempts at explaining her situation and negotiating with the bailiffs were unsuccessful.

The bureau staff contacted Torfaen Council who acted swiftly to resolve the situation, making an agreement on the amount and payment arrangements, and contacting the bailiffs to cease all action immediately.

For further information, please contact:

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Please note I work part time. My normal working days are Monday, Tuesday, Wednesday.