



PORT TALBOT & AFAN WOMEN'S AID
CYMORTH I FERCHED PORT TALBOT AC AFAN

WORKING WITH THE COMMUNITY TO
BREAK THE CYCLE OF DOMESTIC ABUSE

PO Box 20, Port Talbot, SA13 1AA Tel: 01639
894864 / 898881 Fax: 01639 882640
Email: porttalbotwomensaid@btconnect.com Web:
www.ptwa.org.uk

Committee Clerk
Communities, Equality and Local Government Committee
National Assembly for Wales
Cardiff Bay, CF99 1NA

CELG.Committee@wales.gov.uk

GBV 67

Communities, Equality and Local Government Committee
Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill : Stage 1
Response from: Port Talbot and Afan Women's Aid

Submission to the Communities, Equality and Local Government Committee regarding the 'Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill'

ABOUT US

Port Talbot and Afan Women's Aid has been working in Port Talbot and surrounding areas, with women and children impacted by domestic abuse, since 1979.

The PTAWA mission is to empower women and children impacted by Domestic Abuse to move from crisis to safety and independence. We deliver professional, dynamic and innovative services, working collaboratively within our community to break the Domestic Abuse cycle.

PTAWA works to the UN definition, which states that violence against women is '**violence that is directed at a woman because she is a woman or that affects women disproportionately**'. The fundamental belief is that Violence against women is both a cause and a consequence of gender inequality and constitutes a breach of women's fundamental human rights.

The organisation recognises that domestic abuse can take many different forms –whether physical, psychological, financial, emotional, or a combination of them all – and therefore tailors the support that it provides to meet the individual need of each woman and child in its care. Domestic abuse is not just a physical crime. It is a mental roller-coaster causing long-term emotional effects. Listed below are some of our services: :

- PTAWA provides emergency refuge accommodation in a lovely communal home within the heart of Port Talbot. At any one time up to six women and their children can find a safe house here.

- In January 2010, PTAWA also opened a new complex of self-contained flats, also in the Port Talbot area, known as the 'Move-on'. This provides lightly supported housing to five women and their families whilst they continue on the road to completely rebuild their lives following domestic abuse.
- Practical and emotional support is provided to families affected by domestic abuse, who choose to remain at home or in a community setting, through an 'Outreach and Community' service. The aim of the service is to help those women with special and complex needs, specific to their domestic abuse situation, to maintain and sustain their home through making informed choices about their accommodation needs and ensuring their safety. Therefore, PTAWA provides a wide range of support and advice on social and health care, personal financial management, housing, education, safeguarding and legal issues, and employment. We have many excellent relationships with local providers of these services.
- Huge emphasis is placed upon the re-building of women's lives. Each woman has a personalised support plan which identifies her individual needs, agrees and enables steps to regain lost self-confidence and live independently. The emphasis is upon empowerment through additional services such as Counselling and the Freedom Programme.
- The organisation also places great emphasis upon preventive work in the community, schools and youth clubs, to challenge and change tolerance and attitudes so that the incidence of Domestic Abuse is actually reduced. We also provide awareness training to professionals working in many areas including education, health and social services.
- PTAWA is proud of our range of services for children and young people specifically referred to us. These include tea-time clubs in different local schools, a community-based mother and toddler group, a music club for teenagers, a wide range of activities and outings, positive relationship work with both boys and girls, and 1:1 support sessions as needed.
- Our innovative and unique Social Enterprise project 'Beautiful on a Budget' provides a small source of income for PTAWA at the same time as providing local women, including service users, to develop and enhance their skills and experience by meeting together to sort, embellish and brighten up donated clothing for sale on-line and through special events.
- PTAWA is proud to work in partnership with other providers in the area through 'No 17', the One Stop Shop for Domestic Abuse Services in Neath, as well as from our own premises in Port Talbot.
- In addition to 6 Trustees, PTAWA has a team of over ten other volunteers who are willing to give their time and energy to enhance the services provided. We are extremely grateful to all of them for their generosity and willingness to share skills and experience.

Although a member of the umbrella organisation, Welsh Women's Aid, PTAWA is an independent registered charity and company limited by guarantee. It is responsible for the maintenance of all of its own income, whether from statutory or charitable bodies, or from donations. Current funders include Welsh Government, Neath Port Talbot Council, Big Lottery Fund, Children in Need, Lloyds TSB Foundation, Community Foundation in Wales, Coalfields Regeneration Trust, and European Regional Development Fund administered through Collaborative Communities.

Port Talbot and the Afan Valley are recognised on social indices as deprived areas of South Wales, with a very low average income per family as well as an unusually high incidence of Domestic Abuse. Here are a few recent statistics:

- PTAWA provides service for an average of 30 women and their children every month, through refuge, crisis and on-going support in the community. Ages range from 16 to over 55. Although women come from all walks of life, many have highly complex needs.
- Every year, PTAWA provides crisis and longer term accommodation to around 80 women and their children.

- PTAWA specialist children's services provide bespoke support for over 45 children every quarter and see at least 5000 children for preventative work every year. There is often a waiting list.

PTAWA suggestions and comments regarding the Bill are provided on the following pages, and can be summarised as follows:

PTAWA calls on the Welsh Government to :

Reconsider wording of the Bill to return to 'Violence Against Women' instead of 'Gender-based Violence, Domestic Abuse and Sexual Violence in line with the United Nations 'Handbook for Legislation on Violence Against Women'. (Although apparently a small change, PTAWA would also encourage the order of 'he or she' or 'him or her' used within the Bill when referring to victims of the various types of violence and abuse, to be reversed to reflect the fact that women will be the highest proportion affected.)

Appoint an Independent Commissioner on Ending VAW, supported by a Commission to enable the Commissioner to carry out her/his functions. The Commission should include administrative staff as well as advisers and researchers with expertise in all forms of VAW. The functions of the Commissioner should be along the same lines of the proposed functions of the Adviser, taking into account our additions and recommendations below, and with the added functions of holding the Welsh Government to account.

Ensure that a whole school approach is included in any guidance under section 12 of the Bill, alongside any additions to the Welsh curriculum and that this guidance is rigorously implemented and enforced to ensure compliance within 100% of schools across Wales.

Amend the Bill to include at the minimum a duty on employers in Wales to develop a workplace policy specific to domestic abuse and violence against women.

Back up the Bill with considerably increased funding for resources to meet increased demand, to ensure that the considerable expertise of the specialist violence against women sector is protected and strengthened further

PTAWA reasons, including information provided by Welsh Women's Aid, our umbrella body, are included in the pages which follow.

1 General principles and purpose of the Bill: Removal of 'Violence Against Women'

- 1.1 The original title of this legislation proposed within the white paper consultation and other written documentation leading up to the introduction of the GBV Bill on July 1st, was the 'Ending Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Bill'. Originally PTAWA was concerned by fact that this title listed 'Domestic Abuse' and 'Sexual Violence' separately to 'Violence Against Women', as these two phenomena are included within the internationally accepted framework of the forms of 'Violence Against Women' along with other forms of violence and abuse which disproportionately affect women such as female genital mutilation (FGM), forced marriage, crimes committed in the name of 'honor', human slavery, stalking and harassment.
- 1.2 The current internationally accepted definition of 'Violence Against Women' used by organisations including the United Nations, World Health Organisation, Crown Prosecution Service, UK Government and international governments around the world is:

*'Any act of gender-based violence that results in, or is likely to result in, physical, sexual or mental harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.'*¹

This definition is particularly significant as it firmly places 'Violence Against Women' as a violation of women's human rights.

- 1.3 With the loss of the term 'Violence Against Women' from the title and internal wording of the Bill, replaced by the gender-free umbrella term 'Gender-based Violence' (of which 'Violence Against Women' is one type we have effectively lost this framework of understanding that is attached to the term as an internationally recognised shorthand for the most pervasive form of gender-based violence as a particular and significant phenomena. PTAWA is concerned that by moving to the term 'Gender-based Violence' the less common or well understood forms of 'Violence Against Women' such as FGM and stalking will lose priority and fail to be considered within the wider context of abuse in which they sit. This could also inadvertently impact on public understanding of these types of abuse and the work undertaken around the Bill by local authorities and other statutory agencies. This framework of understanding around Violence Against Women is particularly imperative in regards to the local service needs assessments which local authorities will be obliged to undertake which will inform suitable and proportionate commissioning of services for women and children.
- 1.4 The Welsh Government have stated that this change in wording was taken for unspecified legal reasons in order to ensure the Bill was not gendered and able to cover all victims, and the fact that women suffer disproportionately from these types of violence is still made strongly throughout the Bill's supporting documentation within the Explanatory Memorandum and draft guidance. PTAWA remain concerned by this shift in terminology away from the internationally accepted standard as recognition of Violence Against Women will be lost through the change in terminology.
- 1.5 Although PTAWA can appreciate the reasoning behind the Welsh Government's decision, we strongly disagree with the legal advice in this area and would offer evidence in regards to the international examples of gender specific wording in legislation in use in India (Protection of

¹ United Nations: 'Declaration on the Elimination of Violence against Women', General Assembly <http://www.un.org/documents/ga/res/48/a48r104.htm>

Women From Domestic Violence Act, 2005), and Spain (Criminalization of Violence Against Women Law (2007) of Costa Rica).²

- 1.6 The CPS have offered the following justification for their longstanding ‘Violence Against Women and Girls Crime Report’ issued annually:

‘In recognising these forms of violence against women and girls, the CPS does not neglect abuse directed towards men or perpetrated by women. Male victims will receive the same access to protection and legal redress and the gender of the perpetrator does not make any difference to the CPS approach to bringing offenders to justice.’³

- 1.7 Along with other body’s such as the CPS, PTAWA also believes that the term ‘Violence Against Women’ does not exclude men and boys as it refers to a crime type rather than a particular class of victim. There is an inherent acknowledgment that they can also be victims of domestic abuse, sexual violence and other crime types, but that ‘Violence Against Women’ is a specific crime type separate and encompassing of these individual crimes for which women’s suffering is disproportionate.⁴ As women and girls are the overwhelming majority of victims of these types of violence and abuse, and 95% of perpetrators being men,⁵ the benefit of retaining this term within the Bill far outweighs any initial confusion that may be caused in regards to coverage.

2 General principles and purpose of the Bill: definitions of ‘abuse’ and ‘domestic abuse’

- 2.1 PTAWA believes that the definitions used in this Bill are extremely important to ensure a targeted and consistent approach to addressing its aims. Currently there are a number of definitions of ‘domestic abuse’ in use across Welsh Government including within the ‘*Social Services and Well-being (Wales) Act*’ (2014),⁶ the ‘*Housing (Wales) Act*’ (2014),⁷ ‘*The Right to Be Safe Strategy*’, ‘*10’000 Safer Lives*’, and within various draft documents such as the ‘*Council Tax (Chargeable Dwellings) (Amendment) (Wales) Order*’ (2014).⁸ For the Bill to achieve its purpose of improving prevention, protection and support for victims of these crime types, it must provide a definitive cross-portfolio definition which adequately communicates this distinct type of abuse.
- 2.2 ‘Abuse’ - Although ‘psychological’ abuse is included, the definition used within the Bill does not explicitly state the sector’s recognised definition of ‘coercive control’. The use of the term ‘coercive control’ is particularly important as it describes the particular pattern of controlling behaviour that this covers, including emotional, financial and other psychological abuse. The term ‘coercive control’ is currently a feature of the Home Office definition of ‘domestic abuse’ which is widely used across the sector. This Home Office definition may also be formalised into UK legislation with the recent announcement of a consultation on this issue.⁹
- 2.3 ‘Domestic Abuse’ – This definition is very broad and does not specifically include ‘coercive control’, or mention of a specific age range of 16 years or over, which are both features of the

² United Nations Women: ‘Gender-Specific Language in Domestic Violence Laws’

<http://www.endvawnow.org/en/articles/1677-lenguaje-de-genero-en-las-leyes-de-violencia-domestica.html>

³ CPS definition of Violence Against Women: <http://www.cps.gov.uk/publications/equality/vaw/index.html>

⁴ ‘Equality and Diversity Impact Assessment on the CPS Violence Against Women Strategy and Action Plan: Analysis of evidence - April 2008’ http://www.cps.gov.uk/publications/equality/vaw/vaw_eia.html

⁵ Ibid.

⁶ Definition of ‘well-being’ and ‘abuse’ within the ‘*Social Services and Well-being (Wales) Act*’ (2014), sections 2.2 and 197.1.

⁷ Definition of ‘abuse’ and ‘sexual abuse’ in the ‘*Housing (Wales) Act*’ (2014), section 58.1.

⁸ Definition of ‘refuge’ in the ‘*Council Tax (Chargeable Dwellings) (Amendment) (Wales) Order*’ (2014), section a.iv.

⁹ Home Office consultation: ‘Strengthening the law on domestic abuse’

<https://www.gov.uk/government/consultations/strengthening-the-law-on-domestic-abuse>

current Home Office definition. Welsh Government have given assurances to WWA that the omission of an age range is due to the intention of the definition to include all regardless of age, which is welcomed so long as this also continued through into practice when the Bill is implemented. This is particularly important as there is evidence of significant perpetration of domestic abuse amongst teenage intimate partner relationships as evidence has found that many young people view violence as a normal part of intimate relationships.¹⁰ However, as the definition is so broad it also includes abuse between all relatives and family members, which PTAWA is concerned will conflate traditional definitions of intimate partner 'domestic abuse' with other separate and distinct abuse such as PoVA and child protection.

Coercive control must be included as its one of the major forms of abuse we see, if it's not clearly highlighted our concern is women will go back to thinking that "it's not really abuse".
– Newport Women's Aid

- 2.4 This widening of the Bill's remit to all abuse has already been a feature of some discussions involving the CELG Committee and the Minister. PTAWA agree that it is indeed imperative that all victims of domestic abuse and violence against women are helped and supported appropriately at all times, but it is vital for the focus of this Bill to remain specifically on addressing the disproportionate suffering of women from domestic abuse and other forms of Violence Against Women, rather than looking to include all wider forms of violence and abuse which are currently catered for in other laws and initiatives.
- 2.5 PTAWA calls on the Welsh Government to ensure the definitions for domestic abuse used within the Bill are specific enough to enable targeted action on the specific issues and concerns regarding Domestic Abuse and Violence Against Women. PTAWA would recommend amending the definition of 'abuse' on the face of the Bill (section 21.1) to include specific mention of 'coercive control' to align with other UK policy and sector practice. PTAWA also calls on the Welsh Government to amend the definition of 'domestic abuse' within the Bill to ensure the remit of the Bill is not widened into other forms of abuse.

3 General principles and purpose of the Bill: role of the Advisor

- 3.1 PTAWA would strongly suggest that the proposed Advisor role needs to be independent of government and sufficiently resourced in order to hold parties to account and provide strong leadership on Violence Against Women. Partnership with the expert Violence Against Women third sector is vital for this to be effective. Wales has been noted at European and UK conferences as leading the way in the field of VAW; this has been due to close partnership working between the Welsh Government and specialists groups such as those represented by the Wales Violence against Women Action Group. The bold step of proposing gender-specific legislation to tackle the forms of violence that women face because they are women was taken. This approach must continue for Wales to fully to achieve its aspirations in this area.
- 3.2 Similar Welsh models include the proposed Future Generations Commissioner for Wales, the Older People's Commissioner for Wales and the Children's Commissioner for Wales – particularly if the Welsh Government wants VAW to be seen as a comparable priority to child protection, as originally proposed.
- 3.3 There are also a significant number of international comparisons that provide useful models for how this could work in practice including:
 - The State Observatory on Violence Against Women in Spain;¹¹

¹⁰ Wood, Marsha, Barter, Christine and Berridge, David (2011) "Standing on my own two feet": disadvantaged teenagers, intimate partner violence and coercive control (London: NSPCC); available at: http://www.nspcc.org.uk/inform/research/findings/standing_own_two_feet_wda84543.html?dm_i=674,LGWD,KIQCS,1QP,BG,1

¹¹ The Spanish Organic Act on Integrated Protection Measures against Gender Violence (2004) provides for the creation of a State Observatory on Violence against Women, an independent body charged with providing an annual report and ongoing advice to the Government.

- The Special Inter-Institutional Commission for Monitoring the Implementation of the Law against Domestic Violence in Honduras;¹²The Inter-Agency Council on Violence against Women and their Children in the Philippines;¹³ and
- The National Observatory on Violence Against Women in Denmark.¹⁴

7 General principles and purpose of the Bill: omission of education and prevention

7.1 WWA has consulted with member groups across Wales, including PTAWA, colleagues working across the specialist violence against women sector in Wales and the UK, and relevant research literature to develop a number of recommendations around approaching healthy relationship education and domestic abuse in schools, which is seen by the sector and experts as vital to ensuring real change in social attitudes in order to prevent Violence Against Women.

7.2 ***Our primary recommendation for the Bill is as follows: ‘Prevent violence against women through education and support pupils affected’. We recommend this taking place through a wide range of compulsory initiatives in schools and other educational settings to prevent VAW before it starts, and for supporting pupils affected by such violence. Alongside including education on Violence Against Women and healthy relationships within the compulsory Welsh Curriculum taught from a perspective of gender equality and human rights, PTAWA recommends:***

- One fully-trained ‘go-to’ staff member in each school with expertise in VAWG and the knowledge and confidence to assist pupils in seeking assistance and information;
- Ensuring schools regularly collect data on all forms of VAWG, including sexual harassment and bullying;
- Ensuring education on VAWG and healthy relationships is available to children and young people not engaged in formal education system or ‘NEETS’;
- Appointing a VAWG champion amongst school governors and the student council;
- Ensuring that Estyn inspects on school responses to VAWG;
- Ensuring provision of comprehensive VAWG and healthy relationships training for all related professionals.

7.3 PTAWA were disappointed to learn that this education and prevention aspect of the Bill had been omitted when introduced due to efforts to include lessons within the curriculum instead. Although reassurances have now been received by the Welsh Government that guidance on this area will now be included under section 12 of the Bill, PTAWA would like to reiterate the importance of this being a comprehensive whole school approach to preventing and addressing Violence Against Women, as outlined in point 7.2 above.

7.4 As an organisation, PTAWA has considerable experience in the delivery of preventative work in schools and other educational and community settings, through

¹² This Commission was formed following the enactment of the Law on Domestic Violence (1997). It is composed of members from the Government and civil society, and has proposed amendments to the law which were approved by Congress and have been in effect since 2006.

¹³ This Council was formed following the enactment of Section 39 of the Philippine Anti-Violence against Women and their Children Act (2004). The Council monitors the effectiveness of initiatives to address violence against women, and develops programmes and projects to eliminate such violence.

¹⁴ This Observatory consists of experts on violence against women. The aims of the Observatory include to collect information on violence against women and to ensure that government bodies meet national and international legislative and policy commitments in tackling violence against women.

Big Lottery Funded projects, and we would be very happy to share this experience to assist in the development of suitable curriculum content.

8 General principles and purpose of the Bill: omission of universal employer workplace policies

- 8.1 PTAWA strongly supports a universal rollout of workplace policies on domestic abuse and Violence Against Women across all employers in Wales as outlined in the original consultation on this legislation, and was disappointed by the eventual omission of this from the Bill.
- 8.2 Whilst in the UK the key projects to have been undertaken around VAW in the workplace have been limited to domestic abuse policies, there are international examples that point towards the importance of developing a 'whole-workplace approach' to tackling VAW, including through preventative measures and encouraging men within workplaces to challenge violence-supportive attitudes and behaviours. A good example comes from Australia, where Women's Health Victoria's 'Working Together Against Violence' project used workplaces as a setting for the primary prevention of violence against women.¹⁵ The project aimed to strengthen the organisational capacity of a male dominated workplace to promote gender equality and non-violent norms. The project comprised two phases spanning four years, from 2007 to 2011.
- 8.3 The Equality and Human Rights Commission recently updated their guidance on workplace policies to include all forms Violence Against Women¹⁶ and they have also worked in partnership with the CIPD to develop guidance for the private sector.¹⁷

9 Unintended consequences and financial implications: increased pressure on services

- 9.1 Recent Wales figures on the cost of just domestic abuse on the Welsh economy was a total of £826.4 million, which included £303.5m (health care, criminal justice costs, social service, housing, legal and economic) and £522.9m (human and emotional costs).¹⁸
- 9.2 The Violence Against Women sector has suffered from cuts along with other public services in recent years. This has occurred alongside a significant year-on-year increase in demand for Domestic Abuse services.¹⁹ The sector as a whole is very dependent on secure long-term funding from Welsh Government to protect services for women and children fleeing domestic abuse and violence. In a CutsWatch survey of Welsh Women's Aid member groups between April and December 2013 the following information about cuts to funding for services was gathered which is representative of other feedback we have received:
- 9.3 Three services had sustained to Supporting People funding of between 8% and 20%, adding up to over £100,000. A further three had cuts to Supporting People funding of between 4% and 17%, totalling just over £28,000. One service also referred to an imminent cut to Tenancy Support funding; **PTAWA itself suffered cuts of 11%, and these followed year on year cuts of around 2% pa during the preceding 3 years. Our SPPG income now in 2014 is at**

¹⁵ Women's Health Victoria (2011). *Working Together Against Violence*. Final Project Report. Available at: <http://whv.org.au/publications-resources/publications-resources-by-topic/post/working-together-against-violence-finalproject-report/> [accessed 11th July 2012].

¹⁶ http://www.equalityhumanrights.com/sites/default/files/publication_pdf/vaw_workplace_guide_201

¹⁷ <http://www.equalityhumanrights.com/sites/default/files/documents/Wales/domesticabuseguide.pdf>

¹⁸ Gwent Domestic Abuse Pathfinder Project.

¹⁹ PTAWA summary briefing on the CPS VAW Crime Report for 2013-14:

http://www.welshwomensaid.org.uk/images/PTAWA_brief_on_CPS_VAWG_Report_13-14.pdf

least 15% lower than it was in 2011 – and more cuts are expected next year. These figures do not include the fact that prices and costs have of course continued to rise due to inflation during this time.

- 9.4 For children and young people's services in the sector, all WWA services were clear about funding difficulties. **PTAWA stated that in terms of funding for CYP services 'we do not yet know if we have continued funding for this beyond March 2014' and we also highlighted the issue that grant funders think CYP services are statutory therefore there are difficulties finding funding.** Other respondents said 'funding at lowest level for many years' and 'funding for services to support children and young people is inadequate if non-existent' as well as stating that funding for CYP preventative work from Welsh Government is 'very limited'. **PTAWA has just heard that funding for CYP services has been withdrawn by NPTCBC, and is longer included in the long-awaited commissioning process for 'Early Intervention and Prevention' services. There is a risk that 3 people will be made redundant on 31 March 2014 and that specialist services for CYP impacted by Domestic Abuse will no longer be available.**
- 9.5 Therefore increasing reporting as a result of such planned aspects of the Bill as 'Ask and Act' and public sector training will lead to increased pressure on these services without doing anything to address the geographical gaps in provision of services. Provision should be made within the Bill to address any increase in reporting to ensure victims and specialist services are protected and supported to allow a holistic approach to implementation.
- 9.6 If, as hoped, victim reporting of violence against women is raised by the progression of the Bill as it progresses through the National Assembly, then pressure on services is set to become ever more acute in the coming years. Currently it is our understanding that no funds dedicated to the Bill will go towards frontline services such as women's refuge or community 'floating support' ie outreach services within the community.
- 9.7 WWA member groups have stated that they are already under significant pressure and are concerned by an increase in demand without more investment to secure sufficient service levels across Wales. **PTAWA 6 bed-room communal refuge is almost always full and vacancies do not remain for long. In addition, PTAWA has second-stage 'Move-on' accommodation, but due to high demand this is often offered to women and families who require a high level of support, as if in refuge.**
- 9.8 **With current funding levels and further SPPG cuts threatened we do not know how we will find the resources to meet the likely increasing demands caused by Ask and Act, either in refuge or in our Community services.**

10 Comments on subordinate legislation

- 10.1 PTAWA remains concerned that so many recommendations that were made during the White Paper consultation by the Wales Violence against Women Action Group are not explicitly included in the Bill, and therefore run the risk of not being covered appropriately in subordinate legislation.
- 10.2 With regard to what is present, such as the national and local strategies, we are concerned that the balance between primary and secondary legislation is not appropriate, as it simply leads to too much variation of service provision as well as lack of scrutiny, and therefore may lead to minimal change.

Tel: 01639 894864

Website: www.ptwa.org.uk

porttalbotwomensaid@btconnect.com

**Port Talbot and Afan Women's Aid
Breaking the Cycle of Domestic Abuse!**