

Safer Wales Response to the outstanding questions to the committee for the Gender Based Violence, Domestic Abuse and Sexual Violence (Wales) Bill

Definitions

- **Is there potential for confusion over the definitions used between different devolved and non-devolved agencies?**
- **Is 'gender-based violence' an appropriate definition to use in the Bill?**

Safer Wales believe that there would be confusion between devolved and non devolved agencies if the current definitions contained within the Bill is used. These definitions are different from current internationally accepted definitions.

The current internationally accepted definition of 'violence against women' used by the United Nations, World Health Organisation, Crown Prosecution Service, UK Government and international governments 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

Safer Wales recommend that the definition 'Violence Against Women', as expressed above, be used in the Bill to direct and drive national and local priorities and commissioning strategies across Wales. Safer Wales has concerns that 'gender-based violence' terminology will misguide strategies.

Safer Wales is concerned that 'Gender Based Violence' terminology will imply that the prevalence of such crimes is equal between men and women. Safer Wales supports evidenced based services for women and men. The 'Violence against Women' definition will recognise and reflect the disproportionate effect on women and girls. Safer Wales developed and delivers the Safer Wales Dyn Project, a dedicated service that works with Heterosexual, Gay, Bisexual and Transgender men in Wales. Safer Wales do not believe that violence against women strategies would exclude men and boys. Local and national gender-informed strategies would include proportionate services for men and boys

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

Financial implications

- **Is there a danger that the requirements of the Bill could divert resources away from frontline services?**
- **Are you concerned that the Bill may lead to an increase in demand for services without increased funding to deliver them, and is there a need to commission services in a different way to ensure value for money?**
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Safer Wales believes that the Bill could divert resources away from frontline services. Safer Wales recommends that the Welsh Government recognise the societal impact and financial savings of frontline interventions. Safer Wales would recommend that there is recognition of existing sector standards e.g. CAADA qualified IDSVAs being integral to delivery, criminal justice and value for money. Safer Wales recommend that the Welsh Government influence local commissioning strategies to ensure that standards are maintained across the sector which could be achievable with the CAADA IDSVAs standard, which the Welsh Government have already invested in the provision of training.

Safer Wales recognises that, particularly at a time of financial constraints, standards need to be upheld if we are to continue to deliver highly effective, risk-led services. In addition, retention of skilled, experienced staff teams bring added value that would not be recognised within a procurement-led commissioning model. Without ignoring the benefits of constructive competition, consideration may be given to an agreed pay scale for key frontline staff delivering specialist services. Including an expectation for service providers to demonstrate access to opportunities for continuous professional development. This will support Wales in continuing to lead the way in reducing risk, making victims safe, reducing re-offending and achieving effective justice. Safer Wales recognises that the Domestic Abuse and Sexual Violence sector is predominately staffed by women, many of which have been survivors. Safer Wales recommends that skills are kept and valued within the sector.

Safer Wales are concerned that this is not undermined through commissioning and competition pressures. Safer Wales recommend that commissioning of services are weighted towards quality and experience and not highly weighted towards price.

Safer Wales recommends that frontline services be protected and standards maintained across Wales. Safer Wales would expect an increase in demand on the Safer Wales Dyn project through the 'Ask and Act' and the development of commissioning models, strategies and the training of frontline delivery staff across Wales.

Safer Wales recommend the Welsh Government recognise the financial savings frontline services e.g. IDSVAs have for the police, local authorities and health in early intervention

and risk management. Safer Wales recommend that the Welsh Government review the cost effectiveness of frontline services, and the savings to the public sector.

Safer Wales have concerns that the Bill may lead to an increase in demand for services without increased funding to deliver. Safer Wales Dyn project has seen a continued increase in men and agencies accessing our services. When national and local strategies are implemented we would expect to be contacted when services for men and boys are commissioned. Safer Wales would recommend that services which are funded are provided on an evidence base. The IDSVA services which are recognised as the standard by the Home Office prove to be value for money, reducing risks and enabling victims to access the Criminal Justice System.

During the meeting you also agreed to provide further information on the following:

- **your view as to whether to Bill should take a rights-based approach;**
- **whether there is a link between the physical punishment of children and domestic abuse in general (in the context of education and how children and young people are prepared for citizenship);**
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Safer Wales has over 12 years direct experience providing support for women and men, including women experiencing violence and exploitation (particularly through prostitution). Safer Wales recommends that this Bill takes a human rights based approach towards ending violence against women. Such an approach recognises and has the potential to facilitate action to address the inequalities that result in the disproportionate levels of violence against women that is evident across Wales today.

In addition to work/guidance to ensure professionals are able to deliver and achieve increased understanding of a human rights based approach. A human rights based approach, would we feel require work to ensure people are empowered to exercise their rights, for example through awareness raising and education. Safer Wales believes everybody has the right to be safe and does not condone any form of violence, including physical punishment of a child. Safer Wales regularly supports victims and recognises that children witness the abuse and violence. Safer Wales understands the damaging effect that this has on children in the immediate and long term. Safer Wales feels that if we are to achieve better and more sustainable human development outcomes relating to ending violence against women and other forms of domestic abuse, then education of our children and young people is vital. In addition, reducing the likelihood of offending and re-offending is key, whether that be for known current perpetrators or to prevent offending in our future. Safer Wales supports the 3 primary intentions of the Bill to prevent, protect and support. However, to ensure adequate scope to prevent and

protect, educational requirements, including incorporating a whole school approach and working with children and young people not in education or training is vital..

- Who should be ultimately responsible for delivery of the local strategies.

Safer Wales believes that responsibility and accountability for the delivery of local strategies ultimately lies with Ministers for devolved areas and local Chief Execs for non-devolved areas and local outcomes. The Minister should have overall responsibility for the national strategy. Setting clear directions, outcomes and priorities within a National strategy will aid consistency across Wales and reduce the risk of local needs assessments not appropriately identifying all violence against women crime types for example. However, responsibility and accountability for local outcomes resulting from the delivery of local strategies need to lay with the responsible Chief Executives. To aid access to equitable services across Wales, Ministers are in a position to incentivise actions if considered necessary and appropriate to do so.

Safer Wales recommends that strategies include services for men that are proportionate, gender-informed, based on need assessments. Safer Wales experience of developing the Dyn project would recommend that services for men be gender informed, delivered with appropriate resources for incorporation into local and national strategies.

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October 17th 2014