

Ein cyf/Our ref: CEO.12414  
Gofynnwch am/Please ask for: Katie Jenner  
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Dyddiad/Date: 29 August 2023

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Jenny Rathbone MS  
Chair,  
Equality and Social Justice Committee  
Welsh Parliament

By email: [SeneddEquality@Senedd.Wales](mailto:SeneddEquality@Senedd.Wales)

Dear Chair

**Re: Equality and Social Justice Committee inquiry into the public health approach to preventing gender-based violence.**

I write further to your letter of 9 August 2023. In response to the question raised on how statutory services deal with allegations of gender-based violence internally, please note the following which details the approach of Hywel Dda University Health Board for handling allegations of gender-based violence raised by or against employees, together with our overall approach to dealing with this issue.

The Health Board is committed to the health and wellbeing of its patients and staff and recognises that gender-based violence and domestic abuse is a crime, which adversely affects the health of individuals, families, and communities. We promote the identification of abuse and/or violence at an early stage and recognise that it can be an effective measure in preventing an escalation in severity and frequency and can assist to ensure appropriate and timely support is provided. Taking a responsive and enabling approach is fundamental in encouraging people who are experiencing violence, threats, intimidation, and other abuse to disclose.

Advice and support are available from the corporate Safeguarding Team for children and adults at risk of gender-based violence, domestic abuse and sexual violence.

The Health Board's approach is to:

- Promote awareness of violence against women, domestic abuse and sexual violence and promote working practices which will increase identification and improve the response to those experiencing violence against women, domestic abuse, and sexual violence.
- Work in partnership with other statutory agencies and voluntary organisations within Wales and other areas as required.
- Fulfil its obligations in relation to the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

## Objectives:

- To increase identification of those experiencing violence against women, domestic abuse, and sexual violence.
- Recognise that older people are also victims of domestic abuse.
- To offer referrals and interventions for those identified which provide specialist support based on the risk and need of the victim.
- To create a culture across the Health Board where addressing violence against women, domestic abuse and sexual violence is an accepted area of business and where disclosure is expected, supported, accepted, and facilitated.
- To improve the response to those who experience violence against women, domestic abuse and sexual violence with other complex needs such as substance misuse and mental health.
- To proactively engage with those who are vulnerable and hidden, at the earliest opportunity, rather than only reactively engaging with those who are in crisis or at imminent risk of serious harm.

The Health Board has a robust training programme in place for staff to complete Group 1 and Group 2 training in accordance with the Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) National Training Framework to recognise and respond to violence against women, domestic abuse, and sexual violence. We have commissioned Group 6 training for our strategic leaders.

Staff are expected to assess immediate risk or likelihood of serious harm based on their observations and discussions with a patient/staff member.

The Health Board Referral Pathway requires the completion of the DASH/RIC (Domestic Abuse, Stalking and Honour Based Violence Risk Checklist) to assess if the patient/staff member (the victim/survivor) is at moderate or high risk of harm. All high-risk victims must be referred to a Multi-agency Risk Assessment Conference (MARAC) within 48 hours. This referral aims to initiate timely contact with an Independent Domestic Violence Advocate (IDVA). The IDVA will further assess the patient's (the victim) level of risk, discuss the range of suitable options, and develop safety plans.

Midwives and Health Visitors are required to conduct Routine Enquiry at every contact in accordance with the All-Wales Minimum Standards, Routine Enquiry into Domestic Abuse, Pregnancy and Early Years (2021). Should they receive a positive response, they should conduct a DASH/RIC and consider if it meets the criteria for referral to MARAC. If it does not, they should offer support and signpost to access resources.

Routine Enquiry is also being implemented as opposed to targeted enquiry in Emergency Departments and Minor Injury Units to enable early recognition and appropriate intervention to prevent violence escalating.

## Policies and Procedures

The Health Board has a range of policies in place to assist with the support for those who may have experienced gender-based violence, and a quality impact assessment would be undertaken for all policy documents.

### [311 – Domestic abuse and sexual violence workplace policy](#)

Provides guidance to staff and managers in identifying and dealing with domestic abuse and sexual violence both in and outside of the workplace, and assists managers to appropriately address situations where staff are victims or perpetrators of domestic abuse and/or violence.

The Health Board believes that every employee who is experiencing, or has experienced, domestic abuse, sexual violence and/or stalking should be able to disclose such behaviour(s) to their employer. This Policy provides employees with a safe place to disclose and is also aimed at helping those who have concerns that a colleague or peer may be experiencing abuse. The Health Board is committed to dealing with any such disclosure in a supportive and, where possible, confidential manner and takes seriously the need to create and maintain a safe and secure environment in which staff can reach their full potential.

Where allegations against staff have been reported internally, related to violence or abuse which are gender based or otherwise, and indicate they may have behaved in a way that has harmed or may have harmed a child or adult at risk; may have committed a criminal offence against a child or adult at risk or that has a direct impact on the child or adult at risk or behaved towards a child, children or adults at risk in a way that indicates they are unsuitable to work with both children and adults, they are managed under Section 5 of the Wales Safeguarding Procedures 2019. The Health Board cooperates fully with these procedures in collaboration with our statutory partners – relevant Local Authority and Police.

Thereafter, the Health Board will treat any allegation, disclosure or conviction of any abuse related offence on a case-by-case basis with the aim of reducing risk to others including the victim and any identified children/adult at risk. The Health Board recognises that it has a role in encouraging and supporting employees to address their violent and abusive behaviours.

### [592 Ask and Act – Violence against women, domestic abuse and sexual violence policy](#)

Provides clear guidance to all staff in relation to the Welsh Government National Training Framework “Ask and Act” (Welsh Government 2016) issued as statutory guidance Under the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015

### [285 – Violence and aggression Policy](#)

Policy and procedure for the prevention and management of all work-related violence, aggression and abuse of all NHS staff and unacceptable behaviour at Health Board premises.

### [995 Respect and Resolutions Policy](#)

Recognises conflict and disagreements in the workplace happen but should not always be viewed negatively. When conflict is managed well, it leads to healthy, resilient, and positive working relationships. We strive for a workplace where everyone can engage with each other constructively and use the toolkit available to seek their own resolution as far as possible.

### [201 All Wales Disciplinary Policy and Procedure](#)

Ensures that fair and effective arrangements exist for dealing with disciplinary issues and to ensure that expected standards of conduct and behaviour are observed. The policy should be regarded as a valuable tool to promote good employee relations and to correct standards of behaviour, and not as a punitive measure against staff.

### [435 All Wales NHS Staff to Raise Concerns Policy](#)

Procedure for staff to raise any concerns of malpractice or wrong doing at an early stage.

### [350 Supporting Transgender staff policy](#)

Outlines workplace support guidelines for when a trans or non-binary employee is recruited or transitions during their term of employment. It also aims to ensure that staff who are considering, are transitioning or who have transitioned are fully supported at all stages.

### [122 Special Leave Policy](#)

Recognises the wide ranging effects of domestic abuse and contains guidance relating to staff who may need special leave to access specialist services.

## Partnerships

The Health Board are core members of the following multi-agency partnerships:

- Serious Violence and Organised Crime Board
- Community Safety Partnerships for each of the Local Authority areas within the Hywel Dda University Health Board footprint.
- Local Crime Justice Board, to support prevention and reduction of violent crime.
- Dyfed Area Planning Board for Drug and Alcohol Misuse Partnership which has representation from Dyfed Powys Police, Police and Crime Commissioner, His Majesty's Prison and Probation Service (HMPPS) and other criminal justice and crime prevention organisations.
- Mid and West Wales Regional Safeguarding Board
- Mid and West Wales Regional Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) Strategic Board
- Mid and West Wales Regional Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) Delivery Group
- NHS Wales Safeguarding Network VAWDASV Steering Group

## Awareness Raising

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Cadeirydd /Chair  
**Miss Maria Battle**  
Prif Weithredwr/Chief Executive  
**Mr Steve Moore**

Bwrdd Iechyd Prifysgol Hywel Dda yw enw gweithredol Bwrdd Iechyd Lleol Prifysgol Hywel Dda  
Hywel Dda University Health Board is the operational name of Hywel Dda University Local Health Board

The Diversity and Inclusion Team links in with Victim Support each year and shares opportunities for awareness raising and staff training on hate crime towards all protected characteristics, including violence against women.

Active Bystander training events also occur four times a year, for all staff to be able to attend. This training gives staff the confidence to report (and intervene when safe to do so) situations when someone is being treated inappropriately and where to seek help and support.

I trust this response provides the detail you require.

Yours sincerely



**Steve Moore**  
**Chief Executive**