

PLVAW 30

Ymchwiliad ôl-ddeddfwriaethol i Ddeddf Trais yn erbyn Menywod,  
Cam-drin Domestig a Thrais Rhywiol (Cymru) 2015

Post legislative inquiry into the Violence against Women,  
Domestic Abuse and Sexual Violence (Wales) Act 2015

Ymateb gan: Ddiogrlach Cymru

Response from: Safer Wales



## Safer Wales Consultation response – September 2016

The Equality, Local Government and Communities Committee (the Committee) is undertaking a post legislative inquiry into the [Violence against Women, Domestic Abuse and Sexual Violence \(Wales\) Act 2015](#) (the Act).

The Committee's predecessor in the Fourth Assembly, the [Communities, Equality and Local Government Committee](#), was responsible for scrutinising the Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill before it was renamed and became an Act. CELG Committee [reported on the Bill](#) in November 2014.

Safer Wales is an independent Wales-based charity, dedicated to protecting the vulnerable, victims of crime, and victims of poverty and multiple-deprivation, especially women and girls, children and young people and other vulnerable people.

Safer Wales originated in Cardiff Safer Cities Project (1994-1997) which exited as the charity Safer Cardiff in 1998 and re-launched as Safer Wales in 2006. Our roots are therefore in evidence-based multi-agency interventions to increase protection of vulnerable individuals, to reduce offending and the risks of offending and to develop preventive activities including influencing policy and practice. Part of Safer Wales' aim is to continue to innovate new projects where we perceive gaps in service delivery, to evaluate them and to use the evidence to impact policy and practice change

At Safer Wales, we believe in helping vulnerable people to become safe, but also helping them to learn to protect themselves for the future, and to prevent further harm; ultimately being empowered to live their lives free of fear, and engage in productive activities in society, such as education, training, volunteering and employment.

### **To what extent the approach to tackling violence against women, domestic abuse and sexual violence is improving as a result of the obligations in the Act?**

Wales should be proud of leading the way with this piece of ground-breaking legislation. It is important to celebrate and recognise the extent of good practice that has been developed in Wales since 2000, that has influenced the development and delivery of services across the UK and beyond.

At this stage it is too early for Safer Wales to comment on the improvements that the Act has made for VAWDSV. Safer Wales recommends that the term used in the Act 'Violence Against Women, Domestic Abuse and Sexual Violence' (VAWDASV) be used consistently by local authorities and other public bodies to reflect the terminology and vision of the Act. We believe that the use of different terms e.g Gender Based Violence will impact on local strategies, confusion of the wider issues



of VAWDASV and commissioning of services. In addition, Safer Wales would want agencies and Welsh Government to promote and use the UN definition.

Safer Wales promoted the importance of 'Ask and Act' in relation to VAWDASV with partners involved in criminal justice services. In particular, our services in HMP Eastwood Park and HMP Styal routinely ask and act upon VAWDASV disclosures. Thus, informing resettlement and safety planning for women leaving the secure estates who may otherwise have not reported VAWDASV.

Safer Wales would hope that approaches in response to VAWDASV would continue to embrace the multi-agency working that has been evident on Wales and reaches beyond the devolved areas. The impact of VAWDASV is clearly relevant to criminal justice services and has significant impact upon devolved areas in Wales.

There is uncertainty over local VAWDASV strategies and year on year funding cycles may threaten the viability of front line third sector providers, who are expected to support any increase with the implementation of 'Ask and Act and increased disclosure of VAWDASV.

**What are the most effective methods of capturing the views and experiences of survivors? Are arrangements in place to capture these experiences, and to what extent is this information being used to help inform the implementation of the Act's provisions?**

Safer Wales has enabled people who access our services to share their experiences and views to support the implementation of the Act. Survivor engagement should be safe and appropriate and not a 'one size fits all' approach. Safer Wales provide gender informed services and in our experience, women who experience VAWDASV may feel that groups are more beneficial, however men often engage more with one to one activities. These approaches respond to gender, sexual orientation and other barriers which will impact on their engagement with this process.

Safer Wales is aware however, that many survivors may have different experiences within their journey, with different agencies. In a multi-agency context it is important that there is an independent feedback mechanism. Typically a survivor may speak to one agency about their experience elsewhere, and currently there is no space to share this feedback, or to ratify it. Perhaps there is a means of feeding back directly via the Specialist Advisor's office as "ombudsman"

However, Safer Wales recommend that online questionnaires should not be the only option used to gather survivors feedback and only used with a range of other techniques to gain survivors views and experiences.



All clients accessing Safer Wales have access to a range of feedback mechanisms, including our complaints procedures, and can have access to speak to someone senior within the organisation at any time should they have serious concerns.

Safer Wales recommend that Welsh women who experience VAWDASV who are in the secure estate in particular in HMP Eastwood Park and HMP Styal are able to share their views to inform the implementation of the Act's provisions. As the Resettlement provider for all women in HMP Eastwood Park and all women returning to Wales in HMP Styal, Safer Wales is in a position to facilitate such consultations.

Safer Wales supports people to take part in wider consultations which include, Legal Aid, HMIC and local needs assessments. Safer Wales recommend that this information is used to inform the implementation of the Act.

**Whether survivors of abuse are beginning to experience better responses from public authorities as a result of the Act, particularly those needing specialist services?**

Safer Wales believe that this is still at the implementation stage and we are therefore unable to provide a full response at this stage to measure the public authorities response to survivors of VAWDASV. Safer Wales is working with Welsh Women's Aid and other partner organisations in the development of the 'Ask and Act' training for the pilot areas e.g Gwent and when this has been implemented this will provide us with the evidence

Safer Wales has adopted the 'Ask and Act' approach which our resettlement team at HMP Eastwood Park and HMP Styal are using to increase disclosures of VAWDASV. The Safer Wales team are asking every woman about VAWDASV and as a result of disclosure able to act to provide more robust resettlement and safety planning.

Safer Wales is aware that responses from public authorities for survivors vary quite substantially. This is particularly so where survivors are seen as an offender (regardless of the type of offence they have committed), or a survivor is challenging to services (possibly due to dual diagnosis or early/current trauma) or where a survivor may not have presented through the statutory route, for example reporting to the police.

**Whether the National Adviser has sufficient power and independence from the Welsh Government to ensure implementation of the Act?**

Safer Wales welcomes the role of National Adviser; however we are concerned that this post is part time and does not have sufficient power and resources in terms of



holding Welsh Government and other public bodies accountable to their obligations within the Act.

Safer Wales recommends that the Advisor role be made full time to implement the VAWDASV Act and across other policy areas and Welsh legislation, for example Social Services and Well Being (Wales) Act, Future Generations (Wales) Act and Housing (Wales) Act.

**To what extent the good practice guide to healthy relationships is successfully influencing the development of a whole school approach to challenging violence against women, domestic abuse and sexual violence?**

The good practice guide to healthy relationships is a crucial document in raising awareness of healthy relationships within schools. It is vital that the prevalence of VAWDASV reduces and effective change needs to start from early years, creating culture shift. Safer Wales believes that VAWDASV educational programmes and learning should be compulsory across the whole school; through a whole school approach. It is still too early to establish whether the healthy relationships good practice guide has influenced the development of a whole school approach. Safer Wales, therefore recommends that a review of the impact and adoption of VAWDASV educational programmes and learning be undertaken within the next 12-18 months.

Safer Wales recommend that VAWDASV education programmes and learning are provided for young people who are not in formal education and developed for those in higher education.