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## **Response to: Consultation on the violence against women, domestic abuse and sexual violence National Strategy for 2022 to 2026**

Thank you for the opportunity to respond to this consultation. Overall the Strategy has been received positively within the Network with many elements very welcomed including the attempt at inclusive governance. However, we have outlined areas we feel may benefit from additional considerations.

We hope you find this response useful.

### **Introduction to the Wales Safer Communities Network**

The Wales Safer Communities Network was established in January 2021 following the recommendations of the Welsh Government's Working Together for Safer Communities Review. The Network aims to become the strategic voice for community safety in Wales, working collaboratively to champion and support community safety partnership working, and influence the shaping and development of national policy and local practice.

This consultation response represents the views of the Wales Safer Communities Network following feedback expressed at a workshop held by the Network on the 18/01/2022 and incorporates anonymised feedback from the following:

- **Local Authorities- 13 attendees**
- **Policing in Wales-15 attendees**
- **Welsh Local Government Association and Wales Safer Communities Network team – 5 attendees and organisers.**

**Question 1: We have set out our main priorities in the Objectives. Do you think these are the right priorities?** Partially

**Please give reasons for your answer:**

Objective one: If the objective is to challenge the public attitude then there is a need to know the public attitude across the whole spectrum. This will require engagement with all communities including the seldom heard; and ensuring the voice of young people are also heard and perceptions understood. Not all attitudes need to be challenged, just need to challenge the negative ones.

Objectives one and two: There is a need to be mindful of language. Victims don't see it as domestic violence or abuse, but as harmful behaviour. If the wrong language is used then it can be a barrier for people. The use of the word 'challenge' was seen as being a potential problem linked to language, with a suggestion that objective one should be changed to 'Work with people to change negative public attitudes to VAWDASV across the Welsh population...'

Objective two: Does not sit clearly within the proposed governance structure so where is it going to sit?

Objective three: This is not always easy to deliver when the courts are non-devolved. Courts and Justice need to be part of the governance but also supported and trained to understand VAWDASV. There is currently a lack of judgements and sentences alongside a poor experience for victims. It appears the courts are letting victims down, and not taking VAWDASV as seriously as other forms of violence and abuse. There is also the need to focus on earlier prevention programmes, such as 'change that lasts', to stop escalation, rather than just focus on once things have escalated to violence.

Objective five: there are not enough trained professionals to deliver training and support. It costs to train an IDVA, then uncertainty of funding means that it is hard to keep them and they will often move on or into other sectors with more sustainable funding. There are recruitment issues for specialist services as in other sectors at the moment.

**Question 2: Do you think the overall approach we will be taking, as set out in the sections on the [Blueprint](#) is the right one to stop violence against women, domestic abuse and sexual violence? No**

**Please give reasons for your answer:**

It feels to be in a VAWDASV silo, but people don't live in silo's; there is no space for causes of consequences, and co-morbidities with mental health, substance misuse, anti-social behaviour, modern slavery and safeguarding/vulnerabilities. It needs to link in with the wider community safety agenda, as well as with health, and safeguarding.

There is nothing that identifies on-line activity with sexual images being an increasing wider issue.

There is also nothing around Child to Parent Violence, frequently referred to as Adolescent to Parent Violence and Abuse. This at a time when the Covid restrictions appear to have increased the levels of this and an increase in reporting. It requires a specialist service and not as a bolt on to other domestic abuse services.

Collecting data is a second action normally in VAWDASV. People contact in a crisis, often contacting 999, 101 or friends and family. Ensuring the victim is safe is the first priority, which requires action rather than data collection. Data is normally collected after the event. It was felt therefore, that it needed to be clear that data collection whilst essential was alongside ensuring victims and their families are safe.

How the tools and powers are acted on needs to focus on as there is a lack of consistency across Wales. There needs to be a joined-up approach that is co-produced by practitioners so that it works and is delivering for people and stops the post-code lottery. This includes the powers provided to manage stalking, which is hardly mentioned at all.

**Question 3: We have set out the principles which underpin the draft [National Strategy](#). Do you agree with these?** Yes – on the whole

**Please give reasons for your answer:**

We think that there is one principle missing, that of Prevention.

**Question 4: Do you agree with our [immediate priorities](#)?** Yes, but we think some are missing

**Please give reasons for your answer:**

We agree with the ones that have been set out, but we think that a number have been missed being included.

The focus is on regional only, regional Boards and advisors, not all have regional there are some that continue to have local and with the Serious Violence Duty including VAWDASV when it is introduced there is likely to need to be a local response.

There is no immediate priority linked to holding perpetrators to account. Until this begins to happen the other priorities are likely to be negatively impacted.

Funding. Commissioning is currently problematic. Funding comes through a range of funding sources all with their own requirements, this means that only parts of what could be done is being done as there is no specific funding for VAWDASV. Funding is short term. Local needs should be taken into account, which can be different to the regional needs, especially where there are large urban local authorities and small rural local communities within a region. We feel there a single standard for commissioning should be set, but then a broader view should be undertaken to enable a wider range of commissioning options. which allows for regional where appropriate and for local. The Serious Violence Duty that is due to come into being via UK legislation is going to bring VAWDASV into it and be required at a local level, potentially pulling resources away, but also linking the assessment and response to VAWDASV into wider community safety discussions and the Community Safety Partnerships.

**Question 5: What do you think is the most important thing we can do to stop violence against women, domestic abuse and sexual violence?**

Prevention was highlighted as the most important way to stop violence against women, domestic abuse and sexual violence. But we recognise that to do that successfully there needs to be a clearer, more structured and collaborative approach in service delivery across all platforms and with all partners. It was suggested that in order to do this Partnerships require more joined-up funding, clearer governance and a holistic approach in delivery.

Early education was seen as a key area for focussed attention. However, the need for consistent and constant messaging across the generations was supported. Specifically on what is a healthy relationship, what are not acceptable behaviours and explaining the consequences of harmful behaviour.

It was questioned whether schools, youth services, YOT, Youth outreach had been engaged fully within this consultation process as it was felt that the need to engage with youths in an environment that is safe when younger will prevent harmful behaviours into the future.

The newly formed Early Intervention Teams (EATS) and School Beat Policy were highlighted as possible means to support the delivery of the strategy.

**Question 6: Do you think there is anything we should be doing as part of this Strategy that can have a positive effect on opportunities for people to use the Welsh language?**

Providing all elements of the Strategy are delivered bi-lingually we have no comments under this question.

***Question 7: Are there any other things you think we should be doing to stop violence against women, domestic abuse and sexual violence, or do you have any other comments?***

Prevention was highlighted as a shared priority but we recognised many other areas that it was felt was needed in order to stop violence against women, domestic abuse and sexual violence.

We feel that successful outcomes of this strategy will only happen if the right voices are consulted with initially, including victims, survivors, children and young people, and perpetrators as well as service providers.

Communication and engagement are essential and the language used in messaging needs to highlight terms such as 'unhealthy or harmful behaviours' rather than 'domestic abuse' which we feel is less likely to make victims report abuse.

The responsibility for increasing cultural ownership and recognition of unhealthy behaviours sits within all areas of business. We feel that if the community were to be more engaged and empowered with clearer guidance on how to direct others to appropriate help and support there would be an increase of uptake in services at an earlier point rather than waiting until there was serious risk of harm or responding to violence.

***Question 8: How should we measure progress and success in delivering the things outlined in this Strategy?***

We did not overlook the difficulties of identifying a suitable and consistent approach to measuring progress, however we felt that a focus on what is needed to be measured as opposed to what can be measure or what information is already available be helpful.

We are concerned that the Strategy fails to recognise early intervention and as such how would the Strategy look to measure violence against children and young people?

Measuring the confidence in people being able to report is a good thing but what may be a more indicative is to measure the proportion of positive outcomes. Reduction in numbers of repeat victims, repeat perpetrators and victim satisfaction reports would be helpful ways to measure. A successful outcome for a victim might not be a prosecution but that the offences have stopped. Regular feedback from victims would be able to measure the impact that this strategy is having.

Current figures collected (KPIs etc.) are not always accurate as different organisations measure things differently and as such the data is not always accurate or comparable.

We identified that the Perpetrator Programme was not listed within the consultation but the success of that programme could be used as an effectiveness indicator for this Strategy.

We offer a further suggestion by means of monitoring the number of persons/professionals attending events/training. However we appreciate this would again require a more connected governance structure in order to effectively monitor the outcomes of the training.

**Question 9: Do you agree with the [scope of the Strategy](#)? Yes/No**

**Please give reasons for your answer:**

The scope needs to extend to the Police, Crime, Sentencing and Courts Bill which is currently going through UK legislation. This will bring VAWDASV into the Serious Violence Duty, so how the assessment within that requirement for Community Safety Partnerships is going to work alongside the Regionalisation and separate governance for VAWDASV.

**Question 10: We have proposed governance arrangements, which include working with key partner organisation and a number of sub-group/workstreams to tackle specific issues. Do you think working together in this way will improve coordination of work to stop violence against women, domestic abuse and sexual violence? No – only to some extent**

***Please give reasons for your answer.***

The Ministerial Board shows a clear commitment. However, there are no links to other areas of work. There doesn't appear to be any space for victims or discussion around vulnerability. VAWDASV does not sit in isolation, there need to be links from Welsh Government all the way through the structure to Community Safety Partnerships, Public Service Boards, Regional Safeguarding Boards and Substance Misuse Area Planning Boards, as well as to housing, homelessness and education.

To some extent the arrangements will depend on who is engaged at each level. It is felt that strategic decision making groups need to include practitioners, survivors and the voice of perpetrators if change is to be made possible. Strategic ideas need to be practically able to be delivered, that is only possible if there is a practical delivery voice on the decision making Boards who can provide the reality of what is happening in homes, streets and communities.

There needs to be connectivity from the governance structure to the delivery on the ground. Currently there is disconnect between the local and regional. Where there are regional, the local links and focus are being lost leading in some instances to poorer services for victims and perpetrators. Where there are only local there may not be enough need to make commissioning a service possible or sustainable.

Suggestion that there should be a focus on vulnerabilities and within violence prevention rather in isolation. There is concern that there is nowhere for links with children and young people services, including education. They are a focus elsewhere but not in this part and therefore are likely to become isolated and separate from other elements.

The sub-groups don't seem to match with the other elements of the document. It is not clear where sexual violence would sit, or sexual harassment. There is also a need to think about capacity as there are only so many people to attend meetings. Partnership structures need to be looked at and utilised, rather than have and create new ones stretching people's capacity further.

It is also felt that the subgroups don't fit with the objectives, approach and principles.



The governance structure doesn't deal with the wider challenge around the funding for VAWDASV. Funding comes from a range of other programmes with their own governance structure, so without funding this structure will be saying what needs to happen without any resources to deliver it, leading to alignment to other programmes where the money is sourced from but with different aims, potentially leaving known gaps. Whatever needs to be delivered has to be properly resourced, years of austerity have left little flexibility within staff hours for additional elements.

***Question 11: Are you a professional, working with victims, survivors and perpetrators of VAWDASV?***

This response comes from a range of community safety professionals from the police and local authorities drawn together by the Wales Safer Communities Network.

***Question 12: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:***

We are concerned about how silo'd it is. There are links made to the equality action plans, but not to the wider community safety and safeguarding areas.

There is limited focus on bringing together the devolved and non-devolved elements and reducing duplications and possible areas of conflict. For example, there is no mention around Domestic Homicide Reviews and the Single Unified Safeguarding Review which will require the Community Safety Partnerships and Regional Safeguarding Boards working together to carry out reviews that cross over into VAWDASV.

The Network wish to be clear that we welcome and agree with large elements of the Strategy and whilst we are mindful that we have outlined a number of areas that we feel need to be strengthened we appreciate the work and the vision of the Strategy.

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