



Welsh Government Consultation

Violence against Women, Domestic Abuse and Sexual Violence National Strategy 2022-2026

Joint Response by South Riverside Community Development Centre, TCC (Trefnu Cymunedol Cymru/Together Creating Communities), CLPW (Comunidade de Lingua Portuguesa Wrexham), Vesta SFS, Bawso, Henna Foundation, and Women Connect First.

About the Contributors

This consultation response has been developed as part of a partnership between grassroots community organisations and the Bevan Foundation which is bringing the experiences and views of migrant communities to influence policy decisions in Wales. You can find out more about the project here:

<https://www.bevanfoundation.org/current-projects/lived-experience-migration-wales/>.

- **South Riverside Community Development Centre (SRCDC)**

South Riverside Community Development Centre (SRCDC) is a registered charity established for the purpose of benefiting the communities in the Riverside, Canton and Grangetown areas. It aims to advance the education of the public in matters related to mental, physical, cultural, and social welfare; and relieve poverty. You can find out more about SRCDC here: <https://www.srcdc.org.uk/>

- **Together Creating Communities (TCC)**

TCC is a registered charity that tackles social injustice by supporting diverse communities to gain the power they need to enact change. This is achieved through community organising: bringing together local groups, supporting them to set their own agenda, take action, and improve their communities. You can find

out more about TCC here: <https://www.tcc-wales.org.uk/>

- **Comunidade Da Lingua Portuguesa Wrexham (CLPW)**

CLPW is a registered community interest company which promotes educational, social, and cultural integration of Portuguese-speaking diaspora in Wrexham and North Wales. CLPW enriches North Wales through building bonds between residents and creating opportunities to share and celebrate different cultures. You can find out more about CLPW here: <https://www.facebook.com/clpw.uk/>

- **Vesta Specialist Family Support**

Vesta SFS is a community interest company supporting Polish families experiencing domestic abuse through therapeutic courses for victims, counselling and short one-to-one interventions with perpetrators. Support with parenting skills and general well-being of the Polish families is also a key focus. You can find out more about Vesta SFS here: <https://www.vestasfs.org/aboutus>

- **Bawso**

Bawso is the national VAWDASV service in Wales specialising in providing advice and support to Black, ethnic minority and migrant communities and individuals who are affected by abuse, violence and exploitation. You can find out more about Bawso here: <https://bawso.org.uk/>

- **Henna Foundation**

Henna Foundation is a national registered charity committed to strengthening families within Muslim and wider minority ethnic communities. A significant percentage of Henna Foundation's work involves complex VAWDASV casework; supporting and seeking assistance to protect victims of 'Honour' based violence, abuse and crimes, including Forced Marriages and abandoned wives and children.

- **Women Connect First**

Women Connect First (WCF) is a registered charity who empowers and improves the lives of disadvantaged Black and ethnic minority women and communities in South Wales. WCF helps them to realise their full potential through creating opportunities that bring together people from diverse backgrounds to learn together, support each other, shape and influence policy and services and promote greater understanding of and integration into Welsh life.

Our Response

This joint response has been developed by 22 individuals who have moved to Wales from 11 different countries. The contributors include grassroots community activists, advocates and leaders; specialist VAWDASV service providers; advocates from the wider voluntary sector; as well academics. Many of the contributors are survivors of VAWDASV. The views set out in this response were shared during a series of five group discussions held in person and online, facilitated by the Bevan Foundation.

Our response is organised into three sections: (1) what we like about the Strategy; (2) what we think is missing from the Strategy; and (3) how we think the Strategy could be strengthened.

1. What we like about the Strategy

Overall, we believe that the Strategy identifies most elements which are necessary to end violence against women, domestic abuse and sexual violence (VAWDASV). We welcome:

- The emphasis in the objectives on *preventing* VAWDASV through changing attitudes and beliefs. This is equally important as ensuring that specialist VAWDASV services are fully resourced, and that professionals are trained to be able to identify signs of abuse and intervene early.
- The emphasis on the role of men in preventing VAWDASV – especially through challenging other men to change their behaviour. Positive male role models are an essential part of the solution to end VAWDASV.
- The commitment to working with perpetrators of abuse to try to change their behaviour. This is especially important in the early stages, to prevent the behaviour from escalating.

- The emphasis on tackling victim-blaming cultures – this is a societal issue which is deeply entrenched and can make it very difficult for survivors to seek help.
- All of the headline principles, particularly a ‘whole society approach’ (reflecting that everyone has a part to play in ending VAWDASV), an ‘equalities approach’, and the intention for planning and implementation to be collaborative and underpinned by survivors’ voices. In theory, we believe that the National Partnership Board will help to facilitate this, but care needs to be taken to ensure that the right people have a seat at the table (see next section).
- The explicit identification of abuse against older people as a form of VAWDASV. Older people often face more difficulties identifying themselves as victims of abuse and knowing where to go / how to seek help.

2. What we think is missing from the Strategy

We believe that the Strategy is lacking in detail about *how* the objectives will be achieved. Below we highlight our main concerns:

Service provision

- The Strategy’s sixth objective is to ensure that all victims/survivors are provided with equal access to appropriately resourced services across Wales. This is clearly needed, but the Strategy fails to acknowledge the chronic underfunding that is currently affecting specialist VAWDASV services (as well as public services). This is resulting in long waiting lists, difficulties getting through to services, and survivors – and people at risk of perpetrating abuse – being unable to get *timely* support. The Strategy proposes to review the commissioning guidance – and increase consistency of its implementation; while this may be part of the solution, it will not solve this problem. Fundamentally, additional funding is needed.

- If, as the Strategy intends, there is increased focus on awareness-raising and preventative action, then demand for services is likely to increase in the short-to-medium term and the Welsh Government needs to ensure that services are resourced to meet this demand.

An 'equalities approach'

The Strategy fails to identify *specific issues* that need to be addressed to ensure equality is achieved in the implementation of the six objectives. The Strategy mentions 'intersectionality' and lists groups of people who need special consideration within an 'equalities approach', but it is not specific about *what* the issues are that need to be tackled. As a result, it is also lacking in detail about *how* the issues will be tackled. In particular, in relation to Black, ethnic minority and migrant communities:

- The strategy provides no information about how the Welsh Government intends to ensure that awareness-raising campaigns, as well as information about rights and support services, reach individuals, families and communities who are *not fluent in English or Welsh*. Moreover, there is no mention of the importance of ensuring that awareness-raising materials 'speak to' different communities: i.e. that people from minority communities *can relate to the content*.
- The strategy does not specify how the Welsh Government intends to address the *cultural norms and practices* that exist within some migrant communities which makes some forms of VAWDASV more prevalent (e.g. FGM, forced marriage, 'honour-based' abuse).
- Little attention is paid to the fact that some survivors have *multiple perpetrators* – a partner, extended family, in-laws – and that in some cases this abuse is facilitated by the wider community (due to the cultural norms relating to family 'honour' and stigma attached to experiencing, or trying to escape, VAWDASV). This particularly impacts migrant women who have moved to live in the UK with a partner and are isolated or have no support

networks. They often face multiple layers of abuse and victim-blaming which makes it even more difficult to seek support. If a survivor manages to access a support service, *most domestic abuse programmes are tailored to situations where there is a sole perpetrator – usually the partner*. This does not help survivors whose primary / sole perpetrator is not their partner, and/or have multiple perpetrators.

- There is nothing in the strategy that identifies or seeks to tackle the additional barriers faced by migrant survivors of VAWDASV – in particular the impact of having *No Recourse to Public Funds*, and/or having *no awareness of their immigration rights*. Perpetrators will use survivors' immigration status as a form of further control and to deter them from leaving or seeking help. Having no recourse to public funds acts as a further deterrent to leave an abusive relationship because of a fear that the survivor and any children will be left destitute and unable to access safe accommodation. 'Pressing the UK Government' to act is important; but the Strategy does not specify any actions that the *Welsh* Government should be taking to mitigate the impacts of UK immigration policy on survivors in Wales. The 'Nation of Sanctuary' aspirations of the Welsh Government should apply to *all* people fleeing abuse, regardless of their immigration status. This is a significant 'equalities issue', as Black and ethnic minority survivors of VAWDASV are disproportionately impacted by the damaging effects of NRPF.
- There is no mention of human trafficking in the part of the strategy entitled "What counts as VAWDASV" – a form of VAWDASV which disproportionately affects Black, ethnic minority and migrant individuals.
- It is also important to note that the term "Black, Asian and Ethnic Minority" used in the Strategy is not clear about which communities are included under this label. The Strategy needs to clarify whether this term encompasses all migrant communities as well as racially minoritized communities to ensure that the needs of all people from migrant backgrounds are met.

Additionally, there is no commitment in the Strategy to ensuring adequate funding of VAWDASV services who specialise in meeting the needs of different minority groups. This includes cultural/linguistic specialisms, but also services who specialise in support for survivors who are LGBTQ+, of faith, and/or disabled.

Relationships and Sexuality Education Curriculum

- Educating the younger generation about healthy relationships, what constitutes abuse, and where to get support is crucial – and we are glad that this is a priority in the strategy. However, school education continues to be steeped in sexism – this is evident by continuing practices such as prescribing different sports and uniforms for boys and girls. The Strategy does not explain how it proposes to tackle sexism in schools (and the wider society) which underpins and reinforces gender inequality.
- The Strategy also does not state any expectations around VAWDASV funding being used to ensure that the new curriculum is delivered using high quality resources and supported by training and specialist support services. Many specialist services have found it difficult in the past to reach schools.

Perpetrators

We have already mentioned one limitation of the Strategy – the fact that it does not set out any specific plan for addressing abuse perpetrated by multiple parties. Some additional points include:

- The Strategy identifies tackling perpetration as a priority, which we welcome. However, we are concerned that this is primarily linked to working with “Policing, Prison and Probation”, and that the section on “Education and support for those at risk of carrying out abuse” is both brief and non-specific about the current ‘service offer’ and how it will be expanded. Early intervention is key to preventing escalation, but we do not think this is adequately reflected in the Strategy.

- While early intervention with perpetrators is important, accountability is also key. Here we believe the strategy could be much strengthened. While we realise that many actions required to hold perpetrators accountable fall under criminal justice (and therefore outside the jurisdiction of the Welsh Government), the Strategy should set out clearly how perpetrators of abuse can be held to account *outside* the criminal justice system.

VAWDASV in the workplace

- While we welcome the commitment to tackling workplace harassment, we are concerned that no attention is paid in the Strategy to what employers can and should do to support employees who experience domestic abuse. Domestic abuse can impact significantly on employees' ability to turn up to work, let alone their performance in work. Without proper understanding and support in place from the employer, this can lead to loss of employment, creating further stress, isolation, disempowerment, and struggle to support oneself and any children / dependants. Since the beginning of the COVID-19 pandemic, employers' responsibilities to ensure staff wellbeing has become a dominant theme. It is disappointing that the Strategy does not harness this momentum and clearly identify a plan of action for ensuring that employers support survivors of domestic abuse and other forms of violence against women, in addition to tackling workplace harassment.

Definitions

- *Definition of domestic abuse*: currently, the Strategy does not define 'domestic abuse' but rather refers to the definition of 'violence against women and girls' under the *UN Declaration on the Elimination of Violence against Women*. It is not clear in the strategy whether the definition of domestic abuse as set out in the *Domestic Abuse Act 2021* is applicable in Wales. This is important to clarify especially for services who will have duties to implement the strategy. It will also help to clarify the legal basis on which

children as victims of domestic abuse have a right to support. Moreover, the Strategy does not explain the reason for defining domestic abuse as something that can only be perpetrated within a relationship where both / all parties are 16 years or older. The Strategy fails to explain that where one or more of the victims / perpetrators are under the age of 16 then this is classified as 'child abuse'. Omitting this information may lead to confusion, making people think that abuse that happens under the age of 16 is not considered to be abuse.

- In the 'easy read' version of the Strategy, the section entitled 'what counts as VAWDASV' is very limited. In particular, the following forms of abuse are missing: human trafficking; modern-day slavery (sexual exploitation is only one form of exploitation – people are also exploited for domestic work, labouring, drug distribution); online abuse; forced marriage; and all the different forms of domestic abuse – especially financial, emotional and psychological abuse. We do not believe it is sufficient to signpost the reader to the glossary at the end of the Strategy. While it is helpful for the *definitions* to be contained in a separate glossary, it is important that *all* forms of VAWDASV are explicitly labelled in the main body of the strategy. Without this, it leaves the door open for people – survivors, perpetrators, and wider society – to believe that certain forms of abuse are not abuse, since they are not classified as such in the national strategy.

The National Partnership Board

- The Strategy is too vague about how the Welsh Government will decide who will be invited to sit on the Board, and what will inform its decision. The Strategy does not acknowledge the scale of the challenge of ensuring that campaigns that seek to raise awareness and change social and cultural norms in relation to VAWDASV reach different communities and are effective in changing behaviour. Fear of losing one's culture, identity, values, family stability and wider community belonging are significant issues which need to be addressed sensitively, competently, and confidently. Involving trusted

members from *grassroots communities* on the National Partnership Board is crucial if VAWDASV is to be tackled across all communities in Wales, but the Strategy does not mention grassroots community groups / individuals / champions as a proposed partner on the Board.

3. How we think the Strategy could be strengthened

We believe that implementing the following recommendations would strengthen the Strategy:

Recommendation 1: The Strategy should include a commitment from the Welsh Government to develop and publish a short, medium and long-term plan for addressing the funding deficit in specialist VAWDASV services and public services and ensuring that they are well-resourced.

Recommendation 2: The Strategy should include a commitment by the Welsh Government to introduce a common data recording framework for frontline services which includes the *nationality* of survivors referred for support and of perpetrators of abuse. This would enable the cultural and linguistic demographic across Welsh communities to be mapped and would help to inform commissioning decisions to ensure that services who specialise in supporting specific communities with particular cultural / linguistic needs are funded. Commissioning decisions should be underpinned by principles of fairness, equality, and meeting need.

Recommendation 3: The Strategy should be clear about who the term 'Black, Asian and Ethnic Minority' encompasses to ensure that it is understood by everyone that people from white migrant backgrounds are included as well as people from racially minoritized communities.

Recommendation 4: The Strategy should include a commitment by the Welsh Government to ensure that the capacity for Black, ethnic minority and migrant

VAWDASV service providers to engage in policy influencing and development is increased.

Recommendation 5: The Strategy should include a commitment by the Welsh Government to ensure that all publicly-funded services have a robust domestic abuse policy in place for employees, and that private companies / businesses are encouraged to do the same. A 'Gold Standard' Workplace Domestic Abuse Policy should be developed by the Welsh Government (informed by specialists, including survivors). This should include paid leave and flexible hours for survivors of domestic abuse, as well as the option of an 8-hour day contract (instead of 7.5 hours) for survivors with children to enable them to have access to free childcare while working only two days per week.

Recommendation 6: The Strategy should specify actions that could help to prevent financial abuse such as ensuring that Job Centre staff require a 1:1 appointment with individuals registering for Universal Credit – with access to interpretation, if required.

Recommendation 7: The Strategy should identify and commit to addressing the knowledge gap within public services and across the third sector about the impact of time-limited / insecure immigration status on survivors, especially how this can be exploited by perpetrators as a form of further control. In addressing this gap, the Welsh Government should identify what 'good practice' looks like in terms of building trust to encourage survivors to report abuse and seek support without fearing deportation or separation from their children.

Recommendation 8: The Strategy should explicitly identify the impacts of having No Recourse to Public Funds on survivors' safety and access to services and should *specify how* the Welsh Government intends to address this issue. The Welsh Government should clarify how its 'Nation of Sanctuary' aspiration is inclusive of survivors of all forms of violence and abuse, regardless of their immigration status.

Recommendation 9: The Strategy should stipulate that the National Standards for service delivery will require evidence of cultural sensitivity / competence. This

includes offering domestic abuse programmes which are tailored to survivors whose perpetrators are not a partner/ex-partner. The Standards should also require evidence of competence in relation to supporting survivors who are LGBTQ+, disabled, and of faith. This should be embedded in all Welsh Government-funded VAWDASV training programmes for public sector services. The National Training Framework should be reviewed to ensure this is the case.

Recommendation 10: The Strategy should include a commitment to ensuring that campaigns and awareness-raising material are available in different languages and reflect the diversity of cultures and ethnicities which make up Welsh society. Material should always frame VAWDASV as a universal, human rights issue – and a criminal justice issue, where relevant – that applies to everybody living in Wales. The Welsh Government should clarify how it intends to ensure that the information reaches all communities and alleviates the fears of many individuals from migrant backgrounds about losing their culture or identity and being shunned by their community. Working closely with grassroots community advocates and champions will be crucial to achieving this.

Recommendation 11: The Strategy should identify key services in the community where staff should be trained to provide information about rights in Wales and the UK, especially for newcomers. For example: job centres; maternity services; childcare providers; GP surgeries; Hubs and public libraries.

Recommendation 12: The Strategy should include a commitment to ensuring that the voices of grassroots community members feed into the National Partnership Board, in addition to those of survivors and key organisations. The Welsh Government should consult grassroots community organisations on the best approach to achieving this representation: for example, it may be through a process of nominations / recommendations, or through implementing a similar model of engagement to the Senedd – through an Engagement Team. The Welsh Government should ensure transparency about the process of selection / nominations and should carefully consider how it will ensure that the Board representation is fully inclusive – including all protected characteristics.

Recommendation 13: A similar Board / system should be created to develop the National Indicators and be responsible for monitoring their implementation and measuring progress.

Recommendation 14: The Strategy should include a commitment by the Welsh Government to ensure that the Relationships and Sexuality Education curriculum is underpinned by gender equality and includes education about VAWDASV. A commitment should be made to adequately fund high-quality resource development, specialist support, and training from services with expertise in VAWDASV.

Recommendation 15: The Strategy should include a commitment by the Welsh Government to strengthen the legal sector in Wales to enable survivors to get access to justice. This should include increased free provision of immigration and family law advice for survivors of VAWDASV. It should also include much more accessible information to the public and support services about what tools they can use to help maximise the chances of getting justice through the criminal and family courts.

Recommendation 16: The Strategy should identify and set out a plan to address the issues within the Family Courts which sees perpetrators of abuse being able to use the legal system as a tool of further control over the survivor (e.g. use of Prohibited Steps Orders against a survivor to prevent them from taking their child/ren to visit family in their country of origin; allegations of 'parental alienation').

Recommendation 17: The Strategy should include a commitment by the Welsh Government to explore with the UK Government the possibility of incorporating information about VAWDASV – both from a criminal justice perspective and from a support and rights perspective – in immigration applications and the Life in the UK Exam.

Recommendation 18: The Strategy should clarify whether the statutory definition of domestic abuse as set out in the *Domestic Abuse Act 2021* applies in Wales.

Recommendation 19: The Strategy needs to clearly explain the difference between children as victims of domestic abuse and child abuse, and what support children as victims of domestic abuse are entitled to have. The Strategy should also be clear that abuse perpetrated within a relationship or family setting where one or both parties are under the age of 16 *is still abuse* even though it is not classified as domestic abuse.

Recommendation 20: The VAWDASV Strategy itself should be made easily accessible in different languages on the Welsh Government's portal. Similar to the Sanctuary website, a drop-down option of languages should be available on the landing page for the Strategy.

END OF RESPONSE

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