

Welsh Government draft budget proposals for 2018-19

Consultation Response by Welsh Women's Aid

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These are the views of:	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

About Welsh Women's Aid

Welsh Women's Aid is the umbrella membership organisation in Wales that supports and provides national representation for the 24 independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (our membership of specialist services¹). These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors. This includes advising and supporting commissioners and strategic leads in their development of VAWDASV needs assessments and strategic plans, promoting evidence for innovative new service models, and supporting research into the prevention of abuse.

Some of the many umbrella services we deliver for members include facilitating the involvement of member services' in relevant policy, legislative and strategy developments and encouraging co-production in service development; providing advice and information on the development and delivery of promising practice in the sector; providing support with policy and practice matters, and regional and national data analysis reports to support local needs assessments, strategy and commissioning developments.

¹ Our membership of 24 third sector VAWDASV specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated: BAWSO, Hafan Cymru, Safer Wales incl. Dyn Project, Llamau, Cardiff Women's Aid, Cyfannol, Safer Merthyr Tydfil, Newport Women's Aid, Port Talbot & Afan Women's Aid, Swansea Women's Aid, Threshold, Atal Y Fro, Women's Aid RCT, Calan DVS, Carmarthen Domestic Abuse Service, West Wales Domestic Abuse Service, Montgomeryshire Family Crisis Centre, Aberconwy Domestic Abuse Service, Bangor & District Women's Aid, Clwyd Alyn Housing Association Domestic Abuse Service, Domestic Abuse Safety Unit (DASU), Glynwdr Women's Aid, Gorwel (Grwp Cynefin) and North Denbighshire Domestic Abuse Service (NDDAS).



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We also deliver direct services including the Welsh Government funded Live Fear Free Helpline; a National Training Service; the national Children Matter programme of work which, for example, supports local services to help children and young people affected by abuse and to deliver preventative Safety, Trust and Respect (STAR) programmes across Wales, and refuge and advocacy services in Colwyn Bay and Wrexham. We are piloting the Survivors Empowering and Educating Services (SEEdS) project, which is empowering survivors of violence and abuse to collectively influence and inform services and commissioning frameworks, and help change public and community attitudes.

We also deliver the Wales National Quality Service Standards, a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found here: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)

1.1 Welsh Women's Aid's response

1.2 Our response is based, in part, on our recent report to the 'National Task and Finish group to inform the development of a Model for Sustainable Funding for VAWDASV (violence against women, domestic abuse and sexual violence) Specialist Services in Wales', which is a resource mapping funding for third sector organisations that has been informed by the experience of Welsh Women's Aid's direct services and our membership of 24 specialist services, as well as wider VAWDASV organisations across Wales.²

2.1 Summary of Welsh Women's Aid recommendations

1. Strong leadership is needed from Welsh Government to ensure that the national commitments to VAWDASV effectively resourced at a local and regional level. The Welsh Government should ensure it publishes robust commissioning guidance and local strategy guidance for public bodies as soon as possible to improve their practices in funding VAWDASV provision and end the postcode lottery.
2. The Welsh Government should ensure investment into early intervention and prevention does not come at the cost of life saving specialist support services that are vital to survivors and their children.
3. The Welsh Government should ensure that future investment meets the full capacity needed to ensure that services are able to meet demand and retain expertise.

² VAWDASV specialist services/organisations that were contacted for a response to the report: Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Barnardo's - sexual exploitation services, BAWSO, Clwyd Alyn Housing Association (CAHA) Women's Aid, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, DASU, Glyndwr Women's Aid, Gorwel (Grwp Cynefin), Hafan Cymru, Henna Foundation, Llamau, Montgomeryshire Family Crisis Centre, New Pathways, Newport Women's Aid, North Denbighshire Domestic Abuse Service, North Wales Women's Centre, NSPCC, Phoenix Domestic Abuse Service, Port Talbot & Afan Women's Aid, Rape and Sexual Assault Centre North Wales, Relate England and Wales – Choose to Change Perpetrator Project, RCT Women's Aid, Seren, Safer Wales (including Dyn Project), Safer Merthyr Tydfil, Stepping Stones, Swansea Women's Aid, Threshold (formerly Llanelli Women's Aid), West Wales Domestic Abuse Service, Welsh Women's Aid Colwyn Bay, and Wrexham DAS.





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4. 2018/19 draft budget to reflect commitment for a model for sustainable funding for specialist VAWDASV services across Wales, which should be cross-departmental and fit for purpose.
5. Maintain current Supporting People Grant Funding with the view to commit to the reintroduction of indicative three-year Supporting People funding allocation going forward.
6. Welsh Government to confirm core funding for VAWDASV organisations for 2018/19 within the current financial year (2017/18) in order to improve organisations' ability to plan for the 2018/19 financial year.
7. Welsh Government's sustainable model of funding for the VAWDASV sector to be in line with increased demand, expected to be caused by the implementation of the VAWDASV Act, which is appropriately cross-departmental to ensure the robustness of the sector in line with the National Strategy and Delivery Plan (currently in progress).
8. Welsh Government ensures NHS and social care investment enables Health, Social Care and Housing portfolios to play a greater role in the prevention of domestic abuse, sexual violence and other forms of violence against women.
9. Full training costs for public bodies' mandatory training such as Ask and Act should be fully financed by public sector budgets, i.e. the training of Health staff under 'Ask and Act', including the cost of having the specialist sector trainers, should be financed by the Health budget.
10. Welsh Government to implement the 'Change that Lasts' model to guide preventative spending for VAWDASV.
11. Welsh Government to a commitment of funding that is cross-departmental, and a diversification of funding streams that address the full range of needs of survivors of VAWDASV, as well as investment in early intervention and prevention, alongside crisis support and emergency provision.
12. Welsh Women's Aid strongly recommends that the budget prioritises the sustainability of the independent third sector (as well as the public sector), especially small specialist providers like VAWDASV services.
13. Investment should be targeted at systems change and transformation, as well as public service innovation.
14. The Welsh Government should ensure cross-departmental budgets support delivery of multi-agency statutory guidance that delivers systems-change and 'Change that Lasts'.
15. The Welsh Government to use evidence-based information from Welsh Women's Aid while deciding priority setting and budget allocation, including the report produced on behalf of Welsh Government for the model for sustainable funding, and work around the "Change that Lasts" model.
16. The Welsh Government to ensure that the Well-being of Future Generations (Wales) Act 2015 positively influences policy making around VAWDASV by providing leadership and guidance with clear expectations of quality standards required regionally and locally, including engagement with local specialist sector to help guide evidence based and appropriate policy making for each area.

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2.1 What, in your opinion, has been the impact of the Welsh Government's 2017-18 budget?

2.2 Welsh Women's Aid welcomed the Welsh Government's 2017-18 VAWDASV budget that remained static from the previous year at £4.5 million pound.³ This investment is vital to ensure the effective implementation of the VAWDASV (Wales) Act 2015. At least this level of investment is again required to address the full range of needs of survivors of VAWDASV and to ensure investment in early intervention and prevention, alongside vital crisis support and emergency provision. Last year we welcomed the Welsh Government's focus on prevention and early intervention, this has been demonstrated by a letter from the Cabinet Secretary for Communities and Children regarding flexibility in the Supporting People Programme funding use being expanded to cover preventative work. Our concern remains that this new focus has not been accompanied by further investment or sufficient guidance to local commissioners to ensure there remains support for the life-saving specialist services, such as refuge, that are still vital to survivors and their children across Wales.

2.3 We remain concerned that the specialist VAWDASV services in Wales, and the survivors that rely on them, face a postcode lottery dependent on whether local commissioners prioritise them. These services include a range of needs-led and gender responsive approaches such as refuge and emergency housing, 'floating' community support, community-based advocacy, children's services and more. Most refuge services in Wales have low annual turnovers – significantly lower than their English counterparts – and any further cuts to services in 2018/19 will result in detrimental, possibly life-threatening, consequences for survivors of abuse. Without secure funding, the specialist services will be unable to deliver their critically important support enable survivors and their children to recover and gain independence from violence and abuse.

2.4 While the sector faces continued uncertainty with year-on-year funding, we have observed that there is also confusion at a local authority level. The Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 puts duties on local authorities to develop local VAWDASV strategies. These strategies are currently being developed, but commissioning is already occurring on an ad-hoc basis without strong guidance or leadership, as both the Welsh Government's commissioning guidance and their guidance on local strategies are not yet available. This will likely lead to a continuation of the post-code lottery that the VAWDASV (Wales) Act 2015 aimed to address.

2.5 Nationally, Welsh Women's aid is pleased that the Supporting People Programme was recognised as a key priority and protected for 2017-18. We support Cymorth Cymru's *Let's keep on Supporting People* campaign and the need for appropriate protection of the Supporting People budget in 2018-19 and beyond.

2.6 In 2017/18, there was a 4% decrease in total funding for VAWDASV services from the Supporting People grant.⁴ As the Supporting People Programme is by far the largest contributor to VAWDASV specialist services in the third sector, even a small reduction in funding represents a risk to services. There needs to be clear join up between the needs assessments being carried out to inform local VAWDASV strategies and funding decisions made regarding the Supporting People

³ <http://www.assembly.wales/laid%20documents/gen-ld10923/gen-ld10923-e.pdf>.

⁴ Welsh Women's Aid, 'Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales – Draft August 2017'.





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Programme. There needs to be strong communications between strategic VAWDASV groups and Regional Collaborative Committees to ensure decision making supports a sustainable approach to funding specialist services inclusive of the Supporting People Programme.

2.7 The impact of previous budget cuts in the sector are still being felt. Many specialist VAWDASV services across Wales are trying to recover from years of insecure and unstable funding and some are facing year-on-year funding cuts, resulting in over-stretched and under-resourced services. These services have experienced cuts to their children, housing, counselling and refuge services.⁵ The total loss to specialist services funding in Wales for 2017-18 is between 3% and 5%.⁶ This is on top of funding cuts in 2016/17, which were received by 46% of Welsh Women's Aid's national membership of domestic abuse/violence against women services – the vast majority of whom are desperately trying to diversify their funding, at a time where there is very little capacity to do so.⁷ Cumulative cuts have deeply worrying implications for the sustainability of services that offer a lifeline to women, children and families across Wales.

2.7 Cuts lead to pay cuts, reduced support hours in refuge services, a decrease in capacity across whole organisations and services being unable to take on new staff or retain the expertise of long-serving staff, who are forced to find work elsewhere due to job insecurity. One service commented that “staff [are] doing more for less. Increase in working longer hours but we are unable to take time off in lieu as [there's] no time!”⁸

Recommendations:

- 1) Strong leadership is needed from Welsh Government to ensure that the national commitments to VAWDASV are effectively resourced at a local and regional level. The Welsh Government should ensure it publishes robust commissioning guidance and local strategy guidance for public bodies as soon as possible to improve their practices in funding VAWDASV provision and end the postcode lottery.
- 2) The Welsh Government should ensure investment into early intervention and prevention does not come at the cost of life saving specialist support services that are vital to survivors and their children.
- 3) The Welsh Government should ensure that future investment meets the levels needed to ensure that services are able to meet demand and retain expertise.

3.1 What expectations do you have of the 2018-19 draft budget proposals?

3.2 Welsh Women's Aid welcomes the commitment that the Welsh Government has made for a model for sustainable funding for the VAWDASV specialist sector, as laid out in the National Strategy on Violence against Women, Domestic Abuse and Sexual Violence⁹. This is particularly important as it is anticipated that the VAWDASV (Wales) Act 2015 will increase awareness, disclosure and referral to services. Welsh Women's Aid would expect the 2018-19 budget to reflect this commitment for a sustainable model.

⁵ <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/State-of-the-Sector-Report-2016-FINAL.pdf>.

⁶ Welsh Women's Aid, 'Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales – Draft August 2017'.

⁷ <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/State-of-the-Sector-Report-2016-FINAL.pdf>.

⁸ Ibid.

⁹ <http://gov.wales/docs/dsjlg/publications/commsafety/161104-national-strategy-en.pdf>.





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3.3 We are working with the Welsh Government to develop a model for sustainable funding, which needs to be sourced from cross-departmental budgets, for the VAWDASV specialist sector in Wales. This model will safeguard the expertise of specialist organisations that have been providing life-saving services, refuge spaces and life-changing provision for four decades. Without a fit-for-purpose model for sustainable funding tailored for the sector, services are unlikely to be robust, instead continuing to struggle to survive with year-on-year funding that makes planning for the future and retention of expertise incredibly difficult.¹⁰

3.4 In order to be successful, the model for sustainable funding will need to be supported both nationally and locally. Once finalised, Welsh Women's Aid asks that the Welsh Government communicate to local authorities, Local Health Boards and Public Service Boards their roles in making the model for sustainable funding viable in their local area.

3.3 Welsh Women's Aid recommends that the Supporting People Programme Grant funding remains at least at current levels in the 2018-19 budget. We are concerned that any reduction in Supporting People funding would have a massive impact on the most vulnerable people in Wales, particularly VAWDASV survivors and children. In line with the recommendations of the Wales Audit Office¹¹, Welsh Women's Aid supports to call to reintroduce indicative three-year Supporting People funding allocations, that would allow greater certainty across Supporting People funded services.

Recommendation:

- 1) 2018/19 draft budget to reflect commitment for a model for sustainable funding for specialist VAWDASV services across Wales, which should be cross-departmental and fit for purpose.
- 2) Maintain current Supporting People Grant Funding with the view to commit to the reintroduction of indicative three-year Supporting People funding allocation going forward.

4.1 How financially prepared is your organisation for the 2018-19 financial year, and how robust is your ability to plan for future years?

4.2 Welsh Women's Aid regularly consults with our members via our Funding Task and Finish Group. This offers all members an opportunity to raise relevant funding-related challenges and opportunities facing the specialist VAWDASV sector in Wales. Feedback from our members has highlighted that many currently have uncertain or unconfirmed funding beyond this current financial year. This is reflective of previous years in which only 33% (8) services were confident that their funding would continue beyond the current financial year¹². This uncertainty causes staff and delivery uncertainties with impact on retention and recruitment as well as uncertainties for survivors accessing services that their support will continue.

¹⁰ <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/State-of-the-Sector-Report-2016-FINAL.pdf>.

¹¹ <https://www.wao.gov.uk/system/files/publications/Supporting-People-2017-English.pdf>.

¹² <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/State-of-the-Sector-Report-2016-FINAL.pdf>.





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4.3 Many VAWDASV services in Wales find it impossible to adequately plan for the future due to their reliance on annual local authority funding and additional short-term grants¹³. Whereas policy and legislation focusses on long-term approaches to decision-making, this is not always supported by a corresponding long-term approach to funding accessed by the third sector. Therefore, the current funding climate for small specialist providers presents significant challenges with regards strategic business planning, service delivery and development and income diversification.

4.4 Specialist services have seen a reduction in staff and retention of expertise, as well as reduced capacity, while also having to mitigate the impact of funding cuts¹⁴. This has long-lasting and potentially devastating implications for the sustainability of services and the provision of support for women and children across Wales.

4.5 When combined, the grants from local authorities (whether from Housing/Homelessness, Children or Families First, Community Safety and other grants) amounts to 7.72% of funding in the sector in 2017/18 (a decrease from 9.84% in 2016/17)¹⁵. This reduction is of concern given the anticipated increase in referrals from public services over the next five years.

4.6 From Welsh Women's Aid's consultation with our members and the wider VAWDASV sector, experiential evidence suggests specialist services will face increasing challenges in securing sufficient funding to deliver their services.¹⁶ This is especially the case for sexual violence services and specialist BME services. Sexual violence services have received a significant reduction in funding levels between 2016/17 and 2017/18. Welsh Women's Aid's survey of specialist services showed a reduction of 20.2%, with reductions in funding through the loss of Home Office funding, this was not picked up by local commissioners (as was expected by the Home Office). Further reductions in contracts with the Welsh Government (60% funding reduction from all departments combined).¹⁷

4.7 Specialist BME VAWDASV services largely rely on funding at a national level for their core management and infrastructure costs, as well as for some project delivery in the regions.¹⁸ Feedback provided to Welsh Women's Aid suggests that around 50% of their funding from March 2018 is unlikely to continue beyond this date.¹⁹ When coupled with the lack of investment into specialist BME VAWDASV services generally in the regions, the lack of effective regional needs assessment that highlight the needs of VAWDASV survivors from BME communities, and the already inconsistent availability of specialist BME VAWDASV services, there is a real risk to the continuation of these services from 2018.

4.8 A robust sector is a sector with a sustainable model for funding. As we have referenced in section 3 above, the VAWDASV sector's ability to plan for the future largely depends on the success of the model for sustainable funding currently in development, alongside other prevent,

¹³ <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/State-of-the-Sector-Report-2016-FINAL.pdf>.

¹⁴ Ibid.

¹⁵ Welsh Women's Aid, 'Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales – Draft August 2017', 2017.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Ibid.





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protect and support obligations laid out in the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

Recommendation:

- 1) Welsh Government to confirm core funding for VAWDASV organisations for 2018/19 within the current financial year (2017/18) in order to improve organisations' ability to plan for the 2018/19 financial year.
- 2) Welsh Government's sustainable model of funding for the VAWDASV sector to be in line with increased demand, expected to be caused by the implementation of the VAWDASV Act, which is appropriately cross-departmental to ensure the robustness of the sector in line with the National Strategy and Delivery Plan (currently in progress).

5.1 The Committee would like to focus on a number of specific areas in the scrutiny of the budget, do you have any specific comments on the areas identified below?

5.2.1 Financing of local health boards and health and social care services

5.2.2 All forms of violence against women, including domestic abuse and sexual violence are public health issues; the budgets of local health boards and health and social care services need to reflect this. In 2017/18, regional health board funding amounted to a very small proportion of the overall VAWDASV specialist services funding, at just under £120,500, having increased by 1% from the total in 2016/17, which amounted to 0.49% of all funding into specialist services.²⁰ Without these specialist services, costs to health services and other public services would be much higher.

5.2.3 The close link between such abuse and mental and physical ill-health, children's safety and wellbeing, plus the positive results of working in partnership, make it even more important that the NHS recognises and acts upon its responsibilities in this area. The NHS spends more time and money dealing with the impact of violence against women and children than any other agency,²¹ so action to tackle the causes and consequences of such violence is therefore not only cost-effective but contributes to the health and well-being of the population.

5.2.4 In comparison with other services in the UK, VAWDASV specialist services in Wales do not benefit from health service/health commissioner investment either nationally or regionally. This is despite specialist services' core business having a positive impact on the health and well-being of those who face adverse experiences in childhood or as adults.²²

5.2.5 Welsh Women's Aid would like to see greater join-up between Health, Social Care and Housing budgets, and how violence against women prevention is addressed strategically across these sectors. We recommend that the Welsh Government ensures NHS and social care investment enables these agencies to play a greater role in the prevention of domestic abuse, sexual violence and other forms of violence against women.

²⁰ Welsh Women's Aid, 'Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales – Draft July 2017', 2017.

²¹ http://www.irisdomesticviolence.org.uk/iris/uploads/documents/IRIS_CommissioningPack.pdf.

²² Public Health Wales, Making a Difference: Investing in Sustainable Health and Well-being for the People of Wales 2016.





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5.2.6 Welsh Women's Aid has been supporting the early adopter site delivery of 'Ask and Act'²³, which places new duties on public bodies. Although there has been some funding provided for this project going forward, the expertise and support given by the specialist VAWDASV sector throughout this training should be fully costed and financed, as it is not sustainable to expect an already stretched specialist sector to give their time without financial support for this mandatory public sector training. Welsh Women's Aid would expect, for example, that the full cost for training for health staff, including the cost of the having the specialist sector as co-trainer, should be funded by the Health budget.

5.2.7 The Welsh Government should ensure NHS and social care investment enables these agencies to play a greater role in the prevention of domestic abuse, sexual violence and other forms of violence against women, in partnership with specialist services and Welsh Women's Aid. This should include funding arrangements which support Public Health Wales and the Health Boards and Trusts in Wales to:

- a. Commit to delivering a public health approach to preventing domestic abuse, sexual violence and other forms of violence against women.
- b. Commission the IRIS programme for health services and independent (third sector) specialist services, to ensure national delivery.²⁴
- c. Implement violence against women guidance and NICE Domestic Violence and Abuse Guidelines (PH50 2014).²⁵
- d. All Wales roll out of 'Ask and Act', using the learning of the two early adopter sites of Abertawe Bro Morgannwg University Health Board (ABMU) and the Gwent group.

Recommendation:

- 1) Welsh Government ensures NHS and social care investment enables Health, Social Care and Housing portfolios to play a greater role in the prevention of domestic abuse, sexual violence and other forms of violence against women.
- 3) Full training costs for public bodies' mandatory training such as Ask and Act should be fully financed by public sector budgets, i.e. the training of Health staff under "Ask and Act", including the cost of having the specialist sector trainers, should be financed by the Health budget.

5.3.1 Approach to preventative spending and how is this represented in resource allocation (Preventative spending = spending which focuses on preventing problems and eases future demand on services by intervening early)

5.3.2 Commissioning prevention and early intervention work for violence against women is an investment with the potential to create huge financial savings for the future. Domestic violence costs Wales £303.5m annually: £202.6m in service costs and £100.9m to lost economic output.²⁶ These figures do not include any element of human and emotional costs, which the research estimates costs Wales an additional £522.9m.

²³ <http://www.welshwomensaid.org.uk/training/ask-act/>.

²⁴ <http://commissioner.south-wales.police.uk/en/police-crime-plan/violence-women-girls/iris-identification-and-referral-to-improve-safety/>.

²⁵ <https://www.nice.org.uk/guidance/ph50/evidence/review-of-interventions-to-identify-prevent-reduce-and-respond-to-domestic-violence-430413229>.

²⁶ Walby, S., The Cost of Domestic Violence: Update 2009.





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5.3.3. Preventative spending needs to be well invested, which is why Welsh Women's Aid believes in the cost-saving and wide-felt benefits of the 'Change that Lasts' model. The 'Change that Lasts' principles and the approach that underpins the model have been developed in partnership between Welsh Women's Aid and Women's Aid England, and further developed to better address the risks posed by perpetrators with Respect.²⁷

5.3.4 'Change that Lasts' is a strengths-based, needs-led model that supports violence against women, domestic abuse and sexual violence survivors and their children through trauma-informed services in order to build resilience, and leads to safety, freedom and independence. It aims to prevent further incidences of violence through early intervention and specialist support and to prevent new incidents of violence against women, domestic abuse and sexual violence through raising awareness in communities, mitigating adverse experiences of children and young people and providing interventions for perpetrators.

5.3.5 'Change that Lasts' is a cross-sector (community, statutory and voluntary) model of early intervention and prevention and a new, more effective model of support for women and girls affected by, or at risk of violence and abuse. It addresses gaps within current service models and provides a unique integrated approach to meeting the needs of survivors, challenging and changing perpetrators' behaviour, and building strong, more knowledgeable and resilient community responses to violence against women.

5.3.6 Welsh Women's Aid recommends commitment of funding that is cross-departmental within Welsh Government, and a diversification of funding streams that addresses the full range of needs of survivors of VAWDASV and investment in early intervention and prevention, alongside crisis support and emergency provision. Violence against women is a cause and consequence of gender inequality across society²⁸, therefore attitudes need to be challenged both in schools (through a whole education approach²⁹ of age-appropriate discussions throughout the educational journey of each individual – from nursery to further and/or higher education) and within communities themselves (including awareness raising campaigns and bystander initiatives³⁰).

Recommendation:

- 1) Welsh Government to implement the 'Change that Lasts' model to guide preventative spending for VAWDASV.
- 2) Welsh Government to commitment of funding that is cross-departmental, and a diversification of funding streams that address the full range of needs of survivors of VAWDASV, as well as investment in early intervention and prevention, alongside crisis support and emergency provision.

²⁷ <http://www.welshwomensaid.org.uk/what-we-do/our-approach-change-that-lasts/>.

²⁸ UN General Assembly 2006: http://www.un.org/womenwatch/daw/public/VAW_Study/VAWstudyE.pdf;
http://www.who.int/violence_injury_prevention/violence/gender.pdf.

²⁹ <http://gov.wales/topics/people-and-communities/communities/safety/domesticabuse/publications/good-practice-guide-a-whole-education-approach/?lang=en>.

³⁰ <http://www1.uwe.ac.uk/bl/research/interventioninitiative/thetoolkit.aspx>.





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5.4.1 Sustainability of public services, innovation and service transformation

5.4.2 Welsh Women's Aid is concerned that specialist services may see an increase in survivors accessing services who are experiencing multiple disadvantages such as mental health conditions in addition to abuse, due to lost public services. Survivors with multiple disadvantages may also face increased barriers to finding appropriate domestic abuse refuge spaces that address their needs, which may result in them being unable to access the full services provision they require. It is vital that public services such as mental health provision are not lost, and that VAWDASV expertise is also protected, so that survivors' needs can be appropriately addressed through holistic provision that can meet multiple needs.

5.4.3 The trend of investment into core local authority budgets rather than through ring-fenced grants has the potential to have a detrimental impact on public authority grants to violence against women services. Several specialist services in Wales have told us before that local authority cuts to their grant funding are made in order to prop-up statutory provision.³¹ They have also said that the value of partnerships with specialist independent providers like domestic abuse services is not recognised in many local authorities, where they are either quick to cut services and deliver similar provision in-house, or reduce specialist provision in order to contract with one large generic provider. Funding for VAWDASV services needs to be protected.

5.4.4 We recommend investment should be targeted at systems change and transformation as well as public service innovation. Systems-change is being advocated by voluntary sector services like Welsh Women's Aid and others, because at present, government-led systems across public services have developed to only be able to respond to one 'need' at a time, which in turn can generate perverse situations where some of those in greatest need receive the least help.

5.4.5 If inter-related systems were changed to meet survivors' needs from the outset, then resources would be saved and survivors of abuse would achieve a much greater positive benefit from their interaction with public authorities. To support a systems-change approach that transforms services we recommend that the Welsh Government should ensure cross-departmental budgets support delivery of multi-agency statutory guidance that delivers systems-change and 'Change that Lasts'; prioritising needs-led strengths-based delivery that places survivors of abuse at the centre of any intervention.

Recommendation:

- 1) Welsh Women's Aid strongly recommends that the budget prioritises the sustainability of the independent third sector (as well as the public sector), especially small specialist providers like VAWDASV services.
- 2) Investment should be targeted at systems change and transformation, as well as public service innovation.
- 3) The Welsh Government should ensure cross-departmental budgets support delivery of multi-agency statutory guidance that delivers systems-change and 'Change that Lasts'.

5.5.1 Welsh Government policies to reduce poverty, mitigate welfare reform

³¹ <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/State-of-the-Sector-Report-2016-FINAL.pdf>.





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5.5.2 We support a vision for a more equal Wales, and action to tackle the causes and effects of poverty, the creation of cohesive, resilient communities where everyone has the support they need to live healthy, prosperous and independent lives.

5.5.3 However, Welsh Women's Aid recommends that the Welsh Government should ensure budgetary investment targeted at reducing poverty and mitigating welfare reform proactively addresses violence against women prevention and the negative impacts these have on women and children.

5.5.4 Although they are in the purview of the UK Government, scheduled changes to Housing Benefit due to take force in 2019, and changes to Universal Credit have massive implications on VAWDASV specialist services provision in Wales. Welsh Women's Aid is working with the Welsh Government to inform the development of a model for funding supported accommodation that can work within the welfare changes. Welsh Women's Aid members have highlighted that the change in funding from the current housing benefit model presents a real risk to refugees in Wales as housing benefit makes up a large proportion of refugee income. All refugee provision across Wales may be at risk with at least 70% of provision likely to close if no solution is found.³² The Welsh Government's solution must align with their commitment to work collaboratively to build provision of specialist services and develop a sustainable funding model for specialist service in the National Strategy on Violence Against Women, Domestic Abuse and Sexual Violence.

5.5.5 Welsh Women's Aid has also consulted with survivors regarding the impact of the UK Government's welfare reform on their lives and the lives of their children. Welsh survivors tell us they are being detrimentally impacted by the changes to Universal Credit and Child Tax Credit. Welsh Women's Aid has spoken out about these impacts that are not only discriminatory but also put women and children at risk of further abuse. Although these welfare policies are not devolved, the Welsh Government, through the VAWDASV (Wales) Act 2015, has a duty to support and protect survivors, including those impacted by welfare reform. Welsh Women's Aid would ask the Welsh Government to speaking out about the 'Rape Clause' which means that women are forced to disclose rape to receive Child Tax Credit for a third child that may be a result of rape.³³

5.6.1 The Welsh Government's planning and preparedness for Brexit

5.6.2 There is much uncertainty around Brexit and the adverse effects that European withdrawal will have on the most vulnerable people in Wales. We are deeply worried by the lack of women involved in the senior team negotiating Brexit – with just two women at the time of writing. Welsh Women's Aid feels that women and Wales are not appropriately represented at the negotiation table.

5.6.3. We are concerned that the loss of EU money will both directly and indirectly affect the sector, as EU funded projects are discontinued, in addition to VAWDASV services no longer having access to potential future EU funding streams.

³² <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/State-of-the-Sector-Report-2016-FINAL.pdf>.

³³ Welsh Women's Aid's statement on the 'rape clause': <http://www.welshwomensaid.org.uk/2017/04/welsh-womens-aid-statement-uk-governments-tax-credit-rape-clause/>.





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5.6.4 We fear that withdrawal from the European Union will increase the number of women who have no recourse to public funds, as it is not clear how EU nationals and others will have access to funds to access specialist services, such as refuge, thus putting women at risk of all forms of violence against women, domestic abuse and sexual violence without appropriate access to support, a violation of their rights

5.6.5 Covering the costs of accommodating women with no recourse to public funds can be a financial burden on specialist services, in particular on specialist BME provision. This can have an impact on the sustainability of this provision. The Welsh Government will need to provide support to local authorities and providers so that there are alternative processes in place to cover the living/housing costs of accessing safety and protection for EU nationals and their children with no recourse to public funds accessing VAWDASV support. This should be aligned to duties under the Social Services and Wellbeing (Wales) Act 2014. For instance, when commissioning VAWDASV services there should be collaboration with social services to agree the funding of women and children who have experienced domestic abuse with no recourse to public funds, via alternative funds.

5.7.1 How the Welsh Government should use new taxation and borrowing powers

5.7.2 The ability of the National Assembly for Wales to set Welsh rates of income tax from April 2019 will increase the ability of the people of Wales to hold the Welsh Government to account. For this reason, Welsh Women's Aid would hope for an increased commitment by the Welsh Government to invest in provisions for prevention and support for survivors of VAWDASV, including children and young people, recognising the massive cost of VAWDASV in Wales every year. As mentioned previously, the cost of domestic abuse alone in Wales is £826.4m annually (in service costs, lost economic output and human and emotional costs). In addition, each domestic abuse homicide is estimated to cost public services in the region of £1.1million.³⁴

5.7.3 The lost economic output caused by domestic abuse alone, in Wales, is approximately £100.9m of the annual cost³⁵. This is a calculation of lost earnings, productive and taxation due to the time taken out of work due to the impact on the survivor's health, including injuries sustained as a result of the abuse. However, abuse and control also affect survivors' employment status, either through those forced to leave work or being physically and/or psychologically unable to work. As new taxation powers come to Wales, these economic losses as a direct result of VAWDASV will have an adverse effect on the amount of income tax that the Welsh Government can then reinvest into Welsh services. This highlights the importance of early intervention and prevention, as the societal knock-on effects are wide-reaching. By incorporating approaches to prevent VAWDASV, Wales will be more prosperous both with regard to public spending, and also in terms of personal ability to earn, learn and succeed.

5.8.1 How evidence is driving Welsh Government priority setting and budget allocations

5.8.2 Welsh Women's Aid advocates for funding to be allocated on an evidence based model; the Welsh Government have supported Welsh Women's Aid to develop a model for early intervention and prevention of violence against women, including domestic abuse and sexual

³⁴ Walby, S. (2009) The Cost of Domestic Violence: Update 2009. Lancaster: Lancaster University.

³⁵ Ibid.





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violence, called 'Change that Lasts / Newid sy'n Parhau' (as outlined above).³⁶ For survivors this would mean a community that is able to recognise their experience and respond to their specific individual needs. The model recognises survivors with multiple support needs, including those related to age and life experience, and aims to maximise specialist services ability to respond to those individual needs.

5.8.3 Welsh Women's Aid has also prepared an evidence-based report in support of the specialist VAWDASV services' model for sustainable funding for the Welsh Government task and finish group in order to present accurate evidence to support the use of evidence-based budget allocation and priority setting.

Recommendation:

- 1) Welsh Government to use evidence-based information from Welsh Women's Aid while deciding priority setting and budget allocation, including the report produced on behalf of Welsh Government for the model for sustainable funding, and work around the "Change that Lasts" model.

5.9.1 How the Well-being of Future Generations (Wales) Act 2015 is influencing policy making.

5.9.2 While the Well-being of Future Generations (Wales) Act 2015 requires Public Service Boards to publish wellbeing assessments, this work was developed in 2017 separately to the work on VAWDASV local strategies. Welsh Women's Aid found the vast majority of the 19 Public Service Board local well-being assessments³⁷ to be of significantly poor quality in relation to VAWDASV, which we found deeply concerning.

9.2.3 Powys' well-being assessment³⁸ had the best understanding, regard and commitment to VAWDASV. Even so, the assessment acknowledges that very little research into VAWDASV was done, though they had consulted local specialist services, whose concerns were noted.

9.2.4 By comparison, Anglesey and Gwynedd³⁹, whose assessments were developed together but published separately, make no reference to any form of violence against women, domestic abuse or sexual violence.

9.2.5 The Wellbeing of Future Generations (Wales) Act 2015, aims to improve the social, economic, environmental and cultural well-being of Wales. Proper investment into specialist services across Wales would help ensure many of the Act's 'Wellbeing Goals' for a **more prosperous Wales, a Wales of cohesive communities, and a healthier, more equal Wales.**

9.2.6 Early intervention and prevention work for violence against women, including domestic abuse and sexual violence at local, regional and national level has the potential to make a huge difference to the prosperity and success of Wales in the decades to come.

³⁶ The model has been developed in partnership, with initial support from Welsh Government, the Home Office and Women's Aid England, and is informed by a review of the literature and current approaches and by wide-ranging stakeholder engagement including consultation with survivors and specialist services.

³⁷ See link for access to all 19 documents: <http://gov.wales/topics/improving-services/public-services-boards/?lang=en>

³⁸ <http://www.powys.gov.uk/en/corporate/find-out-about-consultations-in-powys/past-consultations/well-being-assessment-survey/full-well-being-assessment-analysis/>.

³⁹ <https://gwyneddandmonwell-being.org/>.





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Welsh Women's Aid

Rhoi Merched a Phlant yn Gyntaf
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Recommendation:

- 1) The Welsh Government to ensure that the Well-being of Future Generations (Wales) Act 2015 positively influences policy making around VAWDASV by providing leadership and guidance with clear expectations of quality standards required regionally and locally, including engagement with the local specialist sector to help guide evidence based and appropriate policy making for each area.

Welsh Women's Aid would again like to thank the Financial Committee and other Committees of the National Assembly for Wales for the opportunity to comment on this important issue. Welsh Women's Aid is also available to provide further written and oral evidence around this issues if required.

Any comments or questions regarding our response can be directed to:

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