



Consultation response to the National Strategy on Violence Against Women, Domestic Abuse and Sexual Violence

1. Introduction

1.1. Citizens Advice Cymru welcomes the opportunity to respond to the Welsh Government's consultation on the national Strategy on Violence Against Women, Domestic Abuse and Sexual Violence.

1.2. We ask that Welsh Government considers the following:

- developing the top-level objectives and priorities to be SMART and outcome focused to enable more effective implementation and monitoring
- make the eLearning package more widely available enabling use by organisations outside of the public sector
- work with Welsh universities to embed awareness and understanding within public sector facing educational courses
- ensure victim and survivor engagement are included as requirements within guidance to the public sector in the creation of their local strategies and regional commissioning approaches
- that ASK and ACT guidance includes information about ASKing as a routine enquiry to enable local discretion when developing an approach
- full cost recovery longer-term commissioning to provide financial stability and enable forward planning for the services involved
- the role of quality approved information and advice services¹ to deliver holistic support to ensure individuals and their families are able to make informed decisions about their future, in particular their housing and financial options

1.3. Citizens Advice Cymru would welcome the opportunity to discuss any of the areas raised in this response with the Violence Against Women and Domestic Abuse team.

¹ The Welsh Government's [Information and Advice Quality Framework](#) to be implemented from April 2017 ensures quality of services to help people understand and exercise their rights and make informed decisions to promote a fair and equal chance in life.

2. General comment

- 2.1. The strategy and priorities listed cover broad areas and are not SMART or outcome focused. While it is understood that this detail will be given within the action plan to accompany the strategy, this has not, and it is understood, will not be made available for comment, therefore limiting respondent's ability to meaningfully engage in informing the Welsh Government's work. We would welcome SMARTer priorities being set within the strategy to enable effective implementation and monitoring. Alternatively, we would welcome commitment to wide stakeholder engagement in developing the action plan to ensure it is outcome focused and person centred to enable Welsh Government and the public bodies of Wales to work effectively together to better prevent and tackle violence against women, domestic abuse and sexual violence (VAWDASV).
- 2.2. As expressed in previous responses we have concern about the level of specialist support available in the community for those who disclose. As a result of increasing awareness and understanding about GVA as well as the roll out of ASK and ACT throughout the public sector we believe there will be increased disclosure and need for services. This is at a time of reduced spend across the sector and noted increase in generic rather than specialist support being made available through supporting people funding for victims and perpetrators of domestic abuse. Ring fenced and/or increased funding is likely to be required to meet the increased need. This would ensure disclosure does not result in people being at risk and could be achieved through the anticipated guidance to public bodies on their local strategies and commissioning approach.
- 2.3. In light of: the Wales Bill; the referendum to leave the EU and impact on public spend; possible reforms to the justice system; and the ongoing austerity impact on public services and welfare benefits, we suggest the strategy includes a commitment to an annual review of the objectives and priorities to enable flexibility and capacity for change. This would help to ensure that the strategy is adaptable to meet the changing external environment and be continuously informed by emerging practice.
- 2.4. In a similar manner, we would advocate for priorities to be rewritten to prevent the strategy being interpreted as not enabling new services to be developed, e.g.
 - *We will work with the National Adviser, the Future Generations Commissioner for Wales, specialist services, Public Health Wales and children's services to ensure that families identified and needing support for living with several adverse childhood experiences relating to domestic abuse and sexual violence, have access to **existing interventions** delivered by specialist services (p24).*

Becomes:

- *We will work with the National Adviser, the Future Generations Commissioner for Wales, specialist services, Public Health Wales, children's **and adult** services to ensure that families identified and needing support for living with several adverse childhood experiences relating to domestic abuse and sexual violence, have access to **interventions** delivered by **specialist and non-specialist services that meet their needs and circumstances** (p24).*

This would enable responses to be developed that are flexible and adaptable to an individual family's circumstances. It would also reflect that the needs analysis required to develop the local strategies may identify service gaps and opportunities for new developments or innovations.

3. Priorities under prevention

- 3.1. We support the objectives identified under prevention which although broad, have identifiable priorities to work towards their achievement.
- 3.2. Within objective 1 we would welcome in the action plan, if not identified in the strategy itself, a commitment from Welsh Government to make the group 1 eLearning package more widely available to the people of Wales, and in particular promote its use to third sector organisations. We, and members of our network can access the course via registering with Learning@NHSWales, however there have been issues with this and its accessibility to those outside of NHS is not widely known. As an excellent free resource that provides a basic level of awareness of VAWDASV, we believe it should be made more widely available and used than it currently is. We ask Welsh Government to enable the eLearning package to be made available:
 - on [the Learning Zone](#) and [Academi Wales](#) to promote its use to the third sector
 - for organisations to embed into their own learning and development
- 3.3. Within either objective 1 or 2 we would welcome a specific commitment for Welsh Government to engage with higher education providers across Wales involved in educating future public sector workers to raise awareness and understanding in relation to VAWDASV. We believe ensuring universities include training to future public sector workers on VAWDASV will help to support and embed the national training framework aims and objectives. We would wish to see the following university courses targeted to include VAWDASV content, survivor and perpetrator voice as a starting point: social work; nursing; trainee doctors; trainee teachers; and housing officers.
- 3.4. An example of where a local authorities has worked successfully with a university to increase service user voice and experience within a formal

learning environment and the benefit this brings to the learner can be seen in Rhondda Cynon Taff. The Carers Support Project and mental health service user involvement programme (run by Interlink) have supported carers and service users to participate in the social work and nursing programmes delivered by University of South Wales for several years. This has been very well received by the learners, contributes to ensuring the future workforce are more aware and understand the needs and issues for these particular user groups while also supporting service users and carers to strengthen their voice and enhance their self-confidence.

- 3.5. We also advocate that work is undertaken with training providers across Wales to embed VAWDASV into continuing professional development (CPD) opportunities and requirements for public sector workers and those working in support services across the public and private sector. Targeting CPD providers to include VAWDASV information would support the National Training Framework implementation and enable more opportunities to educating all groups identified in the framework. We believe working with GP and mental health CPD training providers should be the prioritised due to health links to VAWDASV, in particular the high prevalence of mental ill health within victims and survivors.

4. Priorities under protection

- 4.1. We agree with the priorities set to achieve the protection objective with a focus on the implementation of the National Training Framework on violence against women, domestic abuse and sexual violence. The prioritisation of developing victim and survivor engagement is welcomed. We would want to see emphasis on this approach in the guidance to the public sector in the creation of their local strategies and regional commissioning approaches.
- 4.2. **Citizens Advice ASK a routine enquiry (ASK RE) in Wales** in some face to face advice settings to identify current or past experience of domestic abuse. The following information is therefore provided to support the development of ASK and ACT for the Welsh public sector. Further details are available from [Helen Scadding](#) who would welcome the opportunity to share learning on implementing the programme. Local Citizens Advice offices practising ASK RE are also available to share their experiences and lessons learnt, some of which is available online, such as Flintshire Citizens Advice [‘Let’s talk about domestic abuse’](#) report.
- 4.3. In 2012-13, we found out that less than 0.8% of our enquires concerned gender based violence and abuse (GVA) despite 1 in 4 women experiencing domestic violence and abuse during their adult lifetime, and up to 1 in 6 men experiencing at least one incident of domestic abuse in their adult lifetime. During this period we saw over 1.2 million women. Based on the averages above we could have potentially seen 150,000

female victims and survivors of domestic violence, whereas only 11,500 women disclosed.

- 4.4. The ASK RE programme developed in response to this provides training and support to local Citizens Advice across the UK, integrating a routine enquiry about client's experiences of GVA into unaccompanied face to face advice sessions, and enabling effective support, signposting and advice if there is a disclosure. We adopted ASK RE because, as a service, we adopt a holistic approach to solving our clients' problems. We knew that we needed to find a way to identify more clients affected by GVA, including financial abuse, because it is likely to be linked to the problem(s) they bring to Citizens Advice. Being aware of the full circumstances of a client's problem means that we can deal with a client's problem better by knowing the whole picture.
- 4.5. The pilot phase was carried out in 2013 and tested using a 'routine enquiry' (RE) model, as has been used effectively within the NHS with specific patient groups to ASK about abuse and provide further information as required. Our programme ensures people are only ASKed when they attend a debt, benefit, family/relationship or housing related enquiry on their own, in a face to face private, safe and secure environment. Since the pilot, the training programme has been rolled out to over 100 offices across the UK, resulting in:
 - 6, 487 clients were ASKed between Dec 2014-15 with disclosure rate of 17% (1,072). Of these 84% of those disclosing as victims were women 16% were men.
 - identification that 9 in 10 of the people Citizens Advice helps with a domestic abuse issue also have another issue like debt or housing. The top 3 issues that clients who disclosed GVA were seeking help with were: debt (30%), benefits (25%) or housing (24%).
 - 1.5% of clients ASKed disclosed childhood abuse and 8% previous abuse as an adult and a further 8% abuse that is current or within the last six months.
- 4.6. Evaluation of the approach is ongoing, with independent evaluators from Lancaster University (Dr Susie Balderston and Professor Sylvia Walby) now appointed to investigate and support ASK RE ongoing development and mainstreaming into our advice services. Internal evaluation of the programme to date identified positive outcomes and benefits of using ASK RE, including:
 - GVA is a common problem for our clients
 - asking a routine enquiry does encourage disclosure
 - early disclosure enables us to help more clients and provide options, that could be life saving
 - most clients do not mind being asked the question and victims want to be asked

- advisers develop confidence and skill in using ASK RE over time
 - using ASK RE enables us to provide better advice for more clients
 - partnerships, and signposting and referral, with local and national organisations improves
- 4.7. The ASK RE approach has been adopted by all 19 local Citizens Advice charities in Wales who have completed the training, with 17 local Citizens Advice actively ASKing. Anecdotal evidence from the network in Wales has highlighted issues of rurality and access to services, but overall ASKing has enabled local Citizens Advice to build up positive relationships with local domestic violence agencies to support clients who need immediate help. Rhondda Cynon Taff Citizens Advice have been a part of the ASK programme for over a year and recently decided to extend ASKing the question in all advice areas following an internal review of the programme. They hope that this approach of extending ASK to all clients will reach more people, achieve consistency across their service and help to raise awareness and understanding of GVA within their locality.
- 4.8. From our experience of ASKing we would advocate that ASK and ACT guidance makes reference to ASKing as a routine enquiry rather than targeted enquiry as is proposed. We believe this would support the prevention priority of raising awareness and understanding of GVA throughout Wales by promoting safe discussion and disclosure, as well as supporting the cultural change needed to tackle VAWDASV. In addition, ASKing routinely can avoid the subjectivity of a targeted enquiry process and also the pressure on the frontline staff to make a decision about who to ASK. The independent evaluation of our approach will provide further details on the impact of ASKing routinely. We will make this available to Welsh Government once complete.

5. Priorities under support

- 5.1. We agree with the priorities set to achieve the support objectives. We also welcome the inclusion of providing commissioning and integrated pathway guidance to support the needs of victims experiencing multiple disadvantages. We ask that the commissioning guidance promotes:
- full cost recovery longer-term commissioning to provide financial stability and enable forward planning for the services involved
 - quality approved information and advice services to deliver holistic support to ensure individuals and their families are able to make informed decisions about their future, in particular their housing and financial options
- 5.2. Our recent work to increase awareness and understanding of GVA carried out under our [Talk about abuse](#) campaign included significant research into financial abuse, a much under reported and under identified form of

domestic abuse. From a survey of over 2,000 people, carried out for us by ComRes (May 2015) we found:

- just 2 in 5 UK adults are aware that domestic abuse can include a financial element
- 4 in 10 people (39 per cent) are not aware making a partner account for all their spending can constitute domestic abuse
- more than half (55 per cent) do not recognise taking out a loan in a victim's name without them knowing as a form of abuse²

The research also found that many people are not aware that domestic abuse extends beyond physical violence. This reflects the recent [College of Policing research](#) (Sept 2016) and creation of [new guidance](#) aiming to change the cultural understanding of domestic abuse within UK forces after it was identified that officers may not recognise high risk patterns of coercive and controlling abuse, including financial abuse, due to concentrating on the facts of individual incidents they attend.

- 5.3. The Citizens Advice report [Controlling money, controlling lives](#) in 2014 revealed that victims of financial abuse had access to their bank accounts restricted, were stolen from and had their property destroyed. Some victims sought help after being left with huge debts when they were forced to take out loans for their abuser. The financial abuse was in some cases accompanied by intimidation, physical violence and even repeated death threats. A survey of Citizens Advice advisers for the report found the abuse the victim they helped through their work had experienced financial abuse 77 per cent of the time.
- 5.4. We therefore advocate that the commissioning guidance includes the full range of support services that survivors and victims are likely to need, e.g. specialist information and advice provision covering housing, debt, welfare rights advice, and financial inclusion. These information and advice services are needed in addition to support work undertaken by specialist VAWDASV providers requiring different skills, training, knowledge, insurance and, where relevant, FCA authorisation (for debt work).
- 5.5. The findings from the work by the National Advice Network into the [information and advice needs](#) of Wales should be referenced and utilised within the commissioning guidance to ensure appropriate levels of services are available. This is particularly required in light of the priorities outlined to support objective 5 includes supporting families through Families First funding as a means of promoting integrated, whole-family approach of support. However, the recent announcement on a change of emphasis for Families First funding to prioritise meeting identified service gaps and greater linkage to the preventing Adverse Childhood Events, is set to remove funding from these supportive information and advices.

² For more details see our June 2015 press release [Financial abuse going 'under the radar'](#)

6. Effect on protected characteristics

6.1. We recommend Welsh Government enhance the contextual information in section 2 of the strategy to:

- separate transgender from current LGBT+ section to be a stand alone group to better reflect the particular barriers to disclosure and accessing support transgender people experience, as well as the difference and complexity of their needs
- specifically include disabled people as a group referencing that they experience higher levels of abuse as a result of multiple vulnerabilities and factors related to isolation
- consider additional information regarding the high prevalence of mental health issues for those who experience(d) GVA

About Citizens Advice Cymru

Citizens Advice is an independent charity covering England and Wales, operating as Citizens Advice Cymru in Wales with offices in Cardiff and Rhyl. There are 19 local Citizens Advice in Wales, all of whom are members of Citizens Advice Cymru, delivering services from over 375 locations.

The twin aims of the Citizens Advice service are:

- to provide the advice people need for the problems they face
- to improve the policies and practices that affect people's lives.

The advice provided by the Citizens Advice service is free, independent, quality assured, confidential and impartial, and available to everyone regardless of race, gender, disability, sexual orientation, religion, age or nationality.

The Citizens Advice Service has responsibilities for consumer representation in Wales as a result of the UK Government's changes to the consumer landscape³. Since 1st April 2014 this includes statutory functions and responsibilities to represent post and energy consumers.

For further information or any queries please contact:

Elle McNeil

Policy Officer / Rheolwr Polisi

Citizens Advice Cymru / Cyngor ar Bopeth Cymru

Elle.McNeil@CitizensAdvice.org.uk / policy.cymru@CitizensAdvice.org.uk

³ On 1st April 2013 responsibility for consumer representation was transferred from Consumer Focus to the Citizens Advice Service (including Citizens Advice Cymru) following the UK Government's review of the consumer landscape. From 1st April 2014 this includes statutory functions and responsibilities to represent post and energy consumers