

VIOLENCE AGAINST WOMEN:

Why an
Integrated Strategy
in Wales?



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The Voice of Women in Wales
Llais Menywod yng Nghymru
Wales Women's National Coalition
Clymblaid Genedlaethol Menywod Cymru



VIOLENCE AGAINST WOMEN:

Why an Integrated Strategy in Wales?

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Violence that is directed
against a woman
because she is a woman,
or that affects women
disproportionately

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UN Convention on the Elimination of All
Forms of Discrimination against Women



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I Introduction

The Violence Against Women in Wales Action Group is a coalition of organisations drawn from a broad spectrum of relevant organisations in Wales, including campaigning organisations, charities, service providers, academics and trades unions. We came together in 2009 in order to share our experience and skills with the specific aim of tackling violence against women in Wales through raising awareness, challenging attitudes and pressing for change in government policy.

Our membership includes

- **Amnesty International**
- **BAWSO**
- **Bristol Law School, UWE**
- **Cardiff Women's Aid**
- **Director of the Centre for the Study of Women and Gender, University of Warwick**
- **Equality and Human Rights Commission (observer status)**
- **Henna Foundation**
- **MEWN Cymru**
- **National Federation of Women's Institutes**
- **New Pathways**
- **UNIFEM**
- **UK Joint Committee for Women**
- **United Nations Association**
- **Wales Assembly of Women**
- **Wales Gender Budgeting Group**
- **Wales TUC**
- **Wales Women's National Coalition**
- **WCVA**
- **Welsh Refugee Council**
- **Welsh Women's Aid**
- **Women's Studies and Community Development Co-ordinator, Bangor University**
- **Women4Resources**

The Welsh Assembly Government is currently reviewing its approach to tackling violence against women and has published a draft strategy and action plan¹. We have come together to produce this report in order to take this excellent opportunity to ensure that women are better protected from violence and abuse.

The purpose of this report is to provide a benchmark for the approach that we want to see implemented in Wales to end violence against women. The report will

- outline some good progress in Wales over the last 5 years in tackling violence against women, led by the Welsh Assembly Government and delivered in conjunction with the UK Government, NGOs, local authorities, other public bodies and the criminal justice system.
- outline significant gaps and weaknesses in policy and delivery in Wales, and suggest some solutions.
- focus on the international obligation to deliver an integrated, gender-specific strategy to tackle violence against women. The improvements required in Welsh Assembly Government-led policy are described in the context of an integrated strategy.

The key themes and format of the report are as follows:

- **POLICY:** the need for a clear definition and intent
- **PREVENTION:** reducing violence against women
- **PROTECTION:** keeping women in Wales safe
- **PROVISION:** supporting survivors

We will be working with partners in government and across Wales to highlight the issues featured in this report and to demand a new approach in Wales, with an outcome-driven, citizen-focused strategic operational plan to prevent violence, protect women and support survivors. This is particularly timely given the recent announcements of a new approach to tackling violence against women by the UK Government, which may be restricted in Wales because of the devolved nature of some elements of the framework. Our aim is to ensure that the complexity of the devolution settlement does not further endanger women in Wales.

In this report, our definition of violence against women is based on the UN definition that “violence that is directed against a woman because she is a woman, or that affects women disproportionately”. Our understanding of violence against women includes all forms of violence, including:

- Domestic violence
- Sexual violence, abuse and exploitation
- Stalking and harassment
- Trafficking
- Female Genital Mutilation (FGM)
- Forced marriage
- Crimes committed in the name of honour

In this report, references to women should be interpreted as including both women and girls.

2 Prevalence and Impact of Violence Against Women in Wales

The prevalence of violence against women remains unacceptably high. One in four women in Wales will experience violence at the hands of a partner during their lives, and 150,000 women in Wales will suffer some form of gender-based violence each year.

The following statistics are based on criminal justice figures, the British Crime Survey and other relevant research:

- About 70% of female murder victims are killed by their male partners, with domestic violence the leading cause of death for women 19-44.
- It is estimated that at least 66,000 women in England and Wales have undergone female genital mutilation, and 33,000 girls under the age of 16 are at risk of FGM².
- Between 1,000 and 10,000 women are trafficked into the UK each year.
- 32 cases of forced marriage were dealt with by South Wales Police in 2008. The UK Forced Marriage Unit received reports of 1,600 possible cases in 2008, with 85% female victims and 39% involving children under 18.
- In 30% to 60% of domestic violence cases, the abusive partner is also directly abusing children in the family.
- Of all nations and regions in England and Wales, Wales has the highest percentage rate of partner violence: 7.1% of adults in Wales reported non-sexual violence by a partner in 2005/6³. It is also highest for family non-sexual violence (4.8%) and sexual assault (3.8%).
- 91% of victims of domestic violence are women, with less than 3 in 10 domestic violence incidents reported to police resulting in conviction – only 1 in 4 incidents are even recorded.
- Only 11% of serious sexual assaults are committed by strangers⁴.
- Domestic violence accounts for more death and ill-health than cancer or traffic accidents in Europe.
- On average, a victim of domestic violence is assaulted 35 times before her first call to the police.
- In 2006, the EOC reported that 92% of calls about sexual harassment in the workplace were from women⁵.
- In a recent study of 251 female sex workers over the age of 14 years, 57% experienced gender-based violence over an 18 month period. Almost 40% of the women had experienced physical violence; a quarter had been raped; and 30% had experienced violence from their clients⁶.

Domestic abuse and violence against women is hugely costly, both to the lives of individual women and to society as a whole. The impact of violence ranges from physical injury, psychological consequences, long-term mental health issues, constrained socio-economic opportunities and wider social exclusion. It is difficult to gauge the financial cost to society of violence against women, but given that it can impact on all elements of a woman's life, and the prevalence remains so high, there is an undoubted high cost to the taxpayer.

The cost to the NHS of domestic abuse alone in Wales could be £60 million – extrapolated from UK research showing the cost to NHS in the UK at £1.2 billion a year⁷. The findings of this research estimated that the human and emotional cost of domestic abuse in England and Wales alone is £23 billion a year and violence against women costs £40 billion a year⁸. The Welsh Assembly Government found that women seeking refuge from domestic abuse costs £8.2 million annually⁹, and has a net benefit of £47.9 million – saving this amount of public spending on the justice system, social welfare and health budgets.

² Dorkenoo, E., Morison, L. and MacFarlane, A. (2007) A statistical study to estimate the prevalence of female genital mutilation in England and Wales. Foundation for Women's Health, Research and Development.

³ Home Office Statistical Bulletin (2007) Homicides, Firearm Offences and Intimate Violence 2005/2006

⁴ Finny, A. (2006) The cost of domestic violence. Women and Equality Unit.

⁵ Sexual harassment of men revealed, The Observer; 25 June 2006

⁶ Shannon, K. et al. (2009) Prevalence and Structural Correlates of Gender-based Violence among a Prospective Cohort of Female Sex Workers, British Medical Journal.

⁷ Walby, (2004) The Cost of Domestic Violence, Women and Equality Unit.

⁸ New Philanthropy Capital (2008) Hard Knock Life.

⁹ Welsh Assembly Government, (2006) Costs and Benefits of the Supporting People Programme.

3 Progress in Wales

3.1 All Wales Domestic Abuse Strategy

The publication of Tackling Domestic Abuse: The All Wales National Strategy by the Welsh Assembly Government in 2005 was welcomed as a real step forward in demonstrating that the devolved administration was keen to tackle this particular element of violence against women. It noted its objective was to bring a 'joined-up' problem-solving approach to "providing protection for individuals who suffer domestic abuse and simultaneously addressing the causes of domestic abuse".

Now is the time to ask whether the Assembly Government has delivered against the current Domestic Abuse strategy, and to consider what else needs to be included. There is no doubt that there have been some elements of improvement in service provision and funding, but there is little evidence to suggest that the strategy has had any impact on reducing violence. In fact, there were no targets outlined in the strategy, and no real operational plan designed to deliver change, so it is difficult to evaluate the benefit of the strategy.

Positive progress following the publication of the strategy includes more funding for the All Wales Domestic Abuse Helpline, Domestic Abuse Co-ordinators, project work on substance misuse and links with violence against women, a mechanism for sharing best practice – though limited, and significant improvements in practice within the NHS on tackling domestic violence.

Generally, however, the strategy is a wish-list of good practice. It lacks any real information on implementation and contains no minimum standards or targets against which the strategy can be evaluated, even though the strategy noted that "adequate funding, consistent monitoring, timely evaluation and review are essential if the response to domestic abuse is to continue to improve in Wales".

No new investment was identified as part of any delivery plan. There is little in the way of delivering accountability – no process to hold officials, ministers, Community Safety Partnerships or local authorities to account in tackling violence against women. The Working Group on Domestic Abuse established does not report publicly and its actions are not targeted through an annually updated delivery plan. Its deliberations can therefore be ad hoc rather than strategic, with little review or ongoing evaluation against targets.

The strategy did refer to policies taken by more than one department within the Assembly Government, but in no way was the strategy a cross-government approach to tackling violence against women.

The strategy referred to the UN's Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) policy framework but, as it is gender-neutral, it does not comply with the recommendations that member states establish integrated, gender-specific strategies to tackle violence against women.

The original strategy focused exclusively on domestic abuse and included little reference to other forms of violence, though we understand that other 'strands of activity' have since been included within this strategy. It is difficult to gauge, however, the priority currently placed on tackling different forms of violence against women. We acknowledge the recent launch of a three-year Forced Marriage and Honour Based Violence Action Plan, and individual activities related to trafficking or FGM, but in order to ensure that all forms of violence are tackled across Wales in a strategic and effective way, the Assembly Government will need to look again at the development and delivery of a broader violence against women strategy for Wales.

Ensuring that domestic abuse was raised on the political agenda was important, but it is vital that officials and ministers review the process and ensure that any new strategy fills the gaps evident in the previous strategy whilst also focusing much more on delivery.

3.2 Violence against Women Consultation Document Summer 2009

The women's sector in Wales welcomes a new consultation on a "Strategic Action Plan to Address Violence against Women and to Update the Welsh Assembly Government's Domestic Abuse Strategy" (June 2009). However, while this includes some actions on other forms of violence against women, there is still a heavy bias towards domestic abuse, even amongst those actions which purport to address the wider VAW agenda. Furthermore, there is little understanding evidenced of VAW as a cause and consequence of women's inequality in society. As it stands, the new Action Plan does not go far enough to protect women in Wales from violence, and it does not constitute the integrated strategy that we are calling for.

A bolder strategy is needed: one that recognises the broad spectrum of violence against women; acknowledges the commonalities between all forms of violence against women, which are currently being ignored or missed; and recognises violence against women as a cause and consequence of wider gender inequality. Simply extending current forms of provision will have little impact on prevalence; a strategic and integrated approach is necessary to decrease and prevent violence.

3.3 Funding for Services in Wales

There is no specific budget line that addresses violence against women in Wales. Funding for accommodation services is often drawn from the Supporting People fund, whilst some central funding under Community Safety headings are used for elements of core funding for supporting organisations.

There is no doubt that the Assembly Government budget to tackle some elements of violence against women has increased over the last 6 years. Funding of £3.7 million for 2009-10 for specialist services and projects compares to £0.5 million in 2002-3. New services delivered include a 24-hour domestic abuse helpline, domestic abuse co-ordinators and domestic abuse guidelines for schools. Some £8.2 million from the homelessness budget known as Supporting People is also used to fund accommodation for the victims of violence. Major funding issues mean many women are still turned away from refuges, and much of the sector is focused on chasing short-term funding.

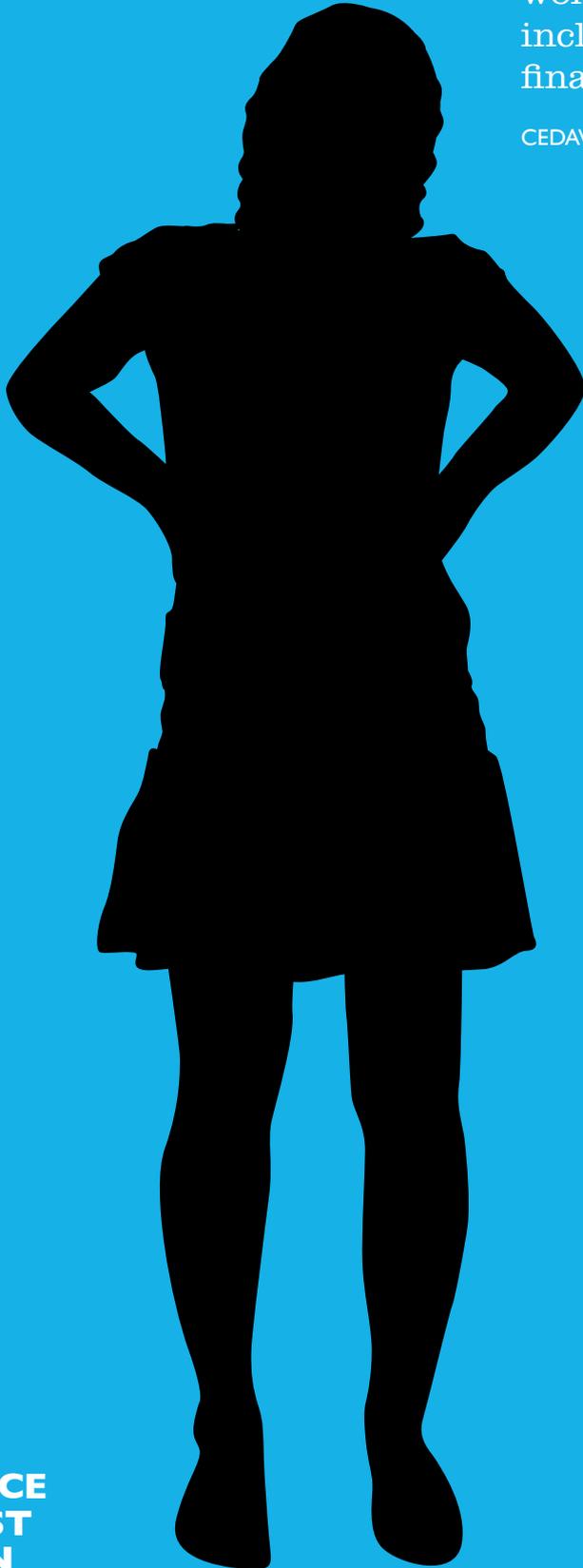
Within this funding is specific funding for BAWSO to deliver services for BME women, which is to be warmly welcomed. There is no specific funding, however, for specialist BME services to tackle honour crimes, forced marriage, FGM or trafficking.

Comparative research has shown that the funding in Wales of women services dealing with violence against women in 2001 was £151.00 per 1,000 women, which equates to £0.15 per woman in Wales. In Northern Ireland it was £1.25 per woman and in England it was £0.49 per woman.¹⁰

The Scottish Government has ring-fenced funding for violence against women, and this is the only part of the UK where funding for services such as rape crisis centres have increased. The VAW Fund in Scotland of £3 million per annum in 2006/07 and 2007/08 is more than double the Home Office's Victims Fund, which secured vulnerable Rape Crisis Centres in England and Wales.

“Implement a unified and multifaceted national strategy to eliminate violence against women and girls, which should include legal, education, financial and social components”

CEDAW Committee 2008



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4 POLICY: Why an Integrated Strategy?

4.1 International Obligations

The UK Government is a signatory to the United Nations' Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), an international bill of rights for women adopted in 1979. This convention calls for state parties to introduce comprehensive, cross-government strategies and programmes to combat all forms of violence against women: "Implement a unified and multifaceted national strategy to eliminate violence against women and girls, which should include legal, education, financial and social components" CEDAW Committee 2008. Following devolution, it falls to the Welsh Assembly Government to deliver this national strategy in Wales.

CEDAW Committee 2008

The UN CEDAW Committee visited the UK in 2008 to report on progress against the articles of the convention. It noted some positive steps forward, but highlighted in its report that it **"remains concerned about the absence of a comprehensive national strategy and programme to combat all forms of violence against women and girls"**. Further, the report said:

The Committee urges the State party to accord priority attention to the adoption of comprehensive measures to address violence against women in accordance with its general recommendation No. 19 on violence against women.

In line with its previous concluding observations of 1999, the Committee also calls upon the State party to adopt and implement a unified and multifaceted national strategy to eliminate violence against women and girls, which would include legal, education, financial and social components. The Committee recommends the expansion of training activities and programmes for parliamentarians, the judiciary and public officials, in particular law enforcement personnel and health-service providers, so as to ensure that they are sensitized to all forms of violence against women and can provide adequate support to victims. It recommends the expansion of public awareness-raising campaigns on all forms of violence against women and girls. The Committee also recommends the establishment of additional counselling and other support services for victims of violence, including shelters, and requests the State party to enhance its cooperation with and support, in particular adequate and sustained funding support, for NGOs working in the area of violence against women.

CEDAW is based on the following definition of violence against women:

"Violence that is directed against a woman because she is a woman, or that affects women disproportionately".

Further, the UN Declaration on the Elimination of Violence Against Women 1993 uses the following definition:

"Any act of gender based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life".

In the recently published Single Equality Scheme (2009), the Assembly Government promised:

"We will have due regard to the United Kingdom's commitments under its international obligations including the following United Nations Conventions: The United Nations Convention on the Elimination of Discrimination against Women".

In contrast, violence against women is not even defined anywhere in the Assembly Government's new consultation document. The All Wales Domestic Abuse Strategy's gender-neutral definition of domestic abuse clearly falls short of the above UN definitions (see 4.3 below).

The Single Equality Scheme also notes that a report addressing the recommendations of the review of the CEDAW Committee will be published in 2011. This review took place in 2008, and it labelled the UK's lack of an integrated strategy to tackle all forms of violence against women as "most alarming for a developed country". It is vital that any Assembly Government strategy to tackle violence against women includes a full definition. It must also tackle all forms of violence, including domestic violence, sexual violence, abuse and exploitation, stalking and harassment, trafficking, FGM, forced marriage and crimes committed in the name of honour.

The UK Government is currently developing such a strategy, and it is vital that Wales develops its own strategic, integrated, cross-departmental approach to avoid falling behind in its international obligations.

4.2 Gender Equality Duty

Positioning violence that women experience in an explicitly gendered context is essential to recognising the nature of violence against women and tackling it appropriately. It conceptualises violence against women as a pattern of behaviour across society, not as a series of individual attacks or acts of violence, and assists with understanding it as a cause and consequence of inequality.

An integrated strategy should be set within the context of the Gender Equality Duty which requires all public bodies to address women's equality, including issues of safety and violence. All public bodies must demonstrate that they are taking active steps to eliminate unlawful discrimination. The Code of Practice advises public bodies to prioritise action to address the most significant gender inequalities within their remit and to take actions that are likely to deliver the best gender equality outcomes. The Equality and Human Rights Commission have recognised that violence against women is one of the most serious forms of gender inequality and have pressed public bodies to take action in this field. In 2008 the Equality and Human Rights Commission in Wales wrote to all Chief Executives of public bodies to request what their top three priorities were under the Gender Equality Duty. Only 2 out of 133 public authorities in Wales clearly identified violence against women as one of their top three priorities.

Lack of priority is one issue, but there also remains a significant misapplication of gender equality duties, worsened by the gender-neutral approach to domestic abuse. Nearly a third of Women's Aid groups in Wales have been requested, officially or unofficially, to open their services to support men who have experienced domestic abuse. This clearly ignores CEDAW recommendations, that 'the interpretation and application of the Gender Equality Duty does not negatively impact on the provision of "women-only" services or restrict the activities of women's organisations',¹¹ and again evidences a worrying lack of understanding of the notion of substantive equality within the Assembly Government (another misunderstanding highlighted by CEDAW as cause for concern in 2008).

A further worrying development is the proposal to change the guidelines for the Supporting People funding stream that supports accommodation services for women fleeing violent situations. Recent proposals suggest changing this category of support to make it gender neutral. This is another example of the misapplication of gender equality duties.

The view held by some senior officials and politicians is that 'equality' means that the same services should be offered to men and women. Given that women are overwhelmingly the victims of violence and of more serious forms of abuse, and men are overwhelmingly the perpetrators, this judgment only reinforces inequality.

¹¹ CEDAW Committee (2008) Concluding Observations of the Committee on the Elimination of Discrimination Against Women: United Kingdom of Great Britain and Northern Ireland.

Case Study: Glyndwr Women's Aid

In 2007, Denbighshire County Council decided to fund a project for victims of domestic violence with substance misuse problems. The Council decided, however, that the service should be the same for men and women, and so two units would be required, one for women and one for men. Given the overwhelming number of women victims, this would clearly mean that women would have less access to the services required. Glyndwr Women's Aid, a specialist service provider, were asked to tender for this service, but this would mean that they would have to amend their constitution and employment practices in order to qualify to deliver the service, and were therefore unable to apply.

Glyndwr Women's Aid are concerned that Women's Aid groups in Denbighshire are either being slowly forced out of being able to tender for domestic abuse projects or are being left with little choice but to open up their support for men which will affect their status of membership with Welsh Women's Aid and could remove their right to only employ women under the Sex Discrimination Act. They are also concerned that a lack of consideration of the requirements of women and children escaping domestic abuse will dangerously compromise their safety and the future of single-sex provision.

4.3 Human Rights Legislation

Under the Human Rights Act 1998, all public bodies have an obligation to protect the human rights of individuals and to ensure that their human rights are not being violated. The articles of the Universal Declaration of Human Rights most relevant to violence against women are:

Article 2: Right to life

Article 3: Right to be free from torture, inhumane and degrading treatment

Article 8: Right to family and private life, which extends to physical and psychological integrity.

A recent report by the Equality and Human Rights Commission's Human Rights Inquiry¹² gave the examples of 'not being sufficiently protected from domestic abuse' and 'failures by the authorities to protect people from being stalked and harassed' as breaches of the Human Rights Act.

The UN Secretary General Ban-ki Moon has argued that "violence against women continues to persist as one of the most heinous, systematic and prevalent human rights abuses in the world". The Assembly Government has reiterated its commitment to human rights and compliance with the 1998 Act is explicit in its establishing legislation. Any integrated strategy must reflect cross-government policy by making explicit the basic standards of protection and treatment that all women should have the right to expect.

4.4 Domestic Comparisons

Public policy in Wales has to a considerable degree reflected the overall approach taken by the UK Government to tackle violence against women. Over the last ten years this has translated into more positive steps taken to reduce women's inequality and welcome progress on raising the issues of violence against women higher on the political agendas of both Westminster and Cardiff Bay. This approach has been punctuated by relatively good partnership working between the Assembly Government and Whitehall and some specific positive steps in Wales to tackle Welsh-specific issues. The approach has generally also focused very considerably on domestic violence but more recently has considered, to a lesser degree, other forms of violence against women.

The Scottish Government has for a number of years dedicated a specific focus to an integrated approach to tackling violence against women. Their approach recognises the links between all forms of violence and for the need for a gender-specific approach, with some ring-fenced funding for services.

Northern Ireland had been some way behind, for a number of reasons, in tackling this issue. Last year, however, the Northern Ireland Executive established a new Inter-Ministerial Group on Domestic and Sexual Violence to bring more focus to the approach.

¹² Equality and Human Rights Commission (2009) Human Rights Inquiry.

In March 2009, the Home Secretary at the time, Jacqui Smith, announced that there would be a new approach spear-headed by the Home Office to introduce an integrated cross-government strategy to tackle violence against women in all its forms. The consultation on this new approach, however, was limited to England. It is absolutely vital that a new and innovative integrated strategy is considered in Wales to ensure that the complexity of the devolution settlement does not mean women in Wales will be less well protected and assisted than women in England. This new strategy must include new forms of partnership working with UK Government departments.

4.5 A Gender-Specific Strategy

It is also very clear that in order to comply with its international obligations, the Assembly Government must develop and deliver a gender-specific strategy to protect women and girls. This does not preclude the provision of services to the male victims of domestic abuse, but does recognise the acknowledged reality that women are overwhelmingly the victims of gender-based violence and that women and men experience violence differently.

Throughout the document, it is repeatedly emphasised that anyone can be a victim of domestic abuse, which is situated within the criminal justice framework rather than as an issue of equality and a violation of women's fundamental human rights. While the All Wales Domestic Abuse Strategy and new draft document do recognise that women are overwhelmingly the victims, current Welsh Assembly Government policy still clearly falls short of the UN definition, which recognises VAW as violence against a woman because she is a woman. Framing domestic violence as being the same as any other form of violence, but taking place within the domestic sphere, fails to recognise it as a cause and consequence of patterned, systemic gender inequality or as an infringement on women's human rights.

There does seem to have been some discussion of the definition within the Working Group on Domestic Abuse¹³ but this was halted because the definition needed to fall in line with the UK's then gender-neutral definition. Now that the UK Government is developing a gendered approach to violence against women, we urge the Welsh Assembly Government to ensure that its own definition evolves accordingly.

The gendered nature of domestic abuse has been recognised in the UK by some elements of government for some time, with the Scottish Government, the CPS, and lately the Home Secretary recognising that the gendered patterns and dynamics involved need to be acknowledged and understood in order to provide an appropriate and effective service to victims of violence. Gendered analysis informs the discourse and consensus of international organisations including the UN General Assembly, the World Health Organisation and UNICEF.

It is very disappointing that the Welsh Assembly Government refuses to accept a gendered framework and acknowledge that a specific strategy is needed to tackle the violence that women in Wales suffer because they are women. The application of gendered analysis around the use of services by women and men would clearly establish their differing needs, and enable sensible gender-specific decisions to be taken that are of benefit to both genders and also more efficient use of public funds.

The One Wales Agreement compels WAG to have due respect for equality of opportunity – that does not mean that exactly the same services, at an equivalent level, should be provided for men and women. If women are overwhelmingly victims of some forms of violence, then the balance in service provision should reflect that.

UK legislation reiterates the international obligations to equality, human rights and the prevention of violence. Recently enacted Gender Equality Duties require all public bodies to address women's equality, including issues of safety and violence. Violence against women is widely recognised as a cause and a consequence of women's inequality, and is linked to the dynamics of power and control that disproportionately disempowers women.

The Government of Wales Act 2006 explicitly refers to the policies on the Assembly Government complying with the Human Rights Act 1998. Violence denies women and girls the most fundamental human rights: life, liberty, bodily integrity, freedom of movement and dignity of the person.

¹³ Minutes of the Welsh Assembly Government Working Group on Domestic Abuse, 16 December 2003.

The All-Wales Domestic Abuse
Strategy defines domestic abuse as:

“ the use of physical and/or
emotional abuse or violence,
including undermining of self
confidence, sexual violence
or the threat of violence, by a
person who is or has been in a
close relationship ”



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4.6 Men as Victims of Domestic Violence

The gender neutrality of the Welsh Assembly Government's policies up until now is presumably due to recognising that some men also experience domestic abuse, and not wishing to exclude these male victims. This need is not in dispute within this document.

The Welsh Assembly Government and other organisations have described the prevalence of male victims by using the statistic that 1 in 6 men suffer from domestic abuse. Many practitioners would question this figure and the way it has been used to evidence the proportion of funding required. The '1 in 6 men, 1 in 4 women' statistic comes from a report into domestic abuse conducted ten years ago for the Home Office. The definition of domestic violence in the report was gender neutral and included 'those incidents involving partners, ex-partners, household members or other relatives regardless of where they took place'. The report used findings from the British Crime Survey, which showed that 23% of women and 15% of men had 'ever' experienced domestic violence – that is, including one-off as well as repeated incidents. This does not take into account that women tend to suffer more persistent and frequent abuse than male victims; nor is it consistent with the All Wales Domestic Abuse Strategy's definition of domestic abuse as consisting of 'frequent and persistent' rather than one-off incidents (p.6). The report itself later outlined that a 'far larger proportion' of women victims of domestic assault had suffered repeat victimisation, that women are more likely to be injured in assaults and are far more likely to be living in fear of their partners.

Practitioners have also reported that male victims of violence may also be perpetrators. There is anecdotal evidence within the MARAC system that supports this suggestion, and in a 2006 report on the Dyn Project, it was noted that practitioners must screen men very carefully to ensure that they only provide services to genuine victims because "when working with heterosexual men it is not possible to rely on a statistical probability that they will be a victim ... perpetrators of domestic abuse use the language of victimisation in order to minimise or excuse their actions"¹⁵. This report stated that 'the distinction between 'victim' and 'perpetrator, among heterosexual men is often blurred. Many of these men are perpetrators or involved in 'common couple violence' where both partners are abusive – and where, in a 'substantial number of cases', the man will have been the 'primary aggressor'.

Recent research in England into gender and domestic violence perpetrators found that women and men have considerably different qualitative and quantitative experiences of domestic abuse, including the following important differences:

- Women experience a greater amount and more severe abuse from male partners.
- The physical and emotional impacts on female victims are significantly greater than on male victims .
- Women's use of violence has been found in a number of studies to be defensive or retaliatory rather than initiating (labelled 'violent resistance' by researchers in the field¹⁶).
- Men are significantly more likely to be repeat perpetrators, with 83% of those surveyed having at least 2 incidents recorded against them (one had 52 incidents), and nearly two-thirds (62%) of women recorded as perpetrators having only once incident recorded.
- The severity and intensity of violence and abusive behaviours from the men was much more extreme.
- Men's violence creates a context of fear and control, which is not usually the case for women perpetrators.
- Women perpetrators are significantly more likely to have mental health of other health issues
- Despite the fact that men are overwhelmingly the perpetrators of domestic abuse, women perpetrators in the study were three times more likely to be arrested than male perpetrators (men were arrested once in every ten incidents, and women once in every three)¹⁷.

These differing qualitative experiences are supported by a number of studies. Dobash and Dobash (2004) found that women's use of violence differs in nature, frequency, intention, intensity, injury and emotional impact, with men reporting women's violence as 'inconsequential' and not effecting their wellbeing or safety¹⁸. Swan's (2005) research into violent women found that severe physical violence, injury, sexual coercion and other controlling behaviours were mostly committed by men, while most female violence was reactive and driven by defence motives¹⁹.

The pattern and severity of such abuse is therefore very different, and the services required to support survivors of different genders are very different. It is certainly the case that men are victims of domestic violence, and that the Welsh Assembly Government has a duty to ensure that these victims have access to protection and support. There is serious concern, however, if the '1 in 6' statistic is used to direct policy or to apportion funding, or to divert funding from women-only organisations.

¹⁴ Mirrlees-Black, C. (1999) Domestic Violence: Findings from a new British Crime Survey self-completion questionnaire, Home Office Research Study 191

¹⁵ Robinson, A and Rowlands, J (2006) The Dyn Project: Supporting men experiencing domestic abuse: Final Evaluation Report, December, Cardiff University and the Dyn Project.

¹⁶ Johnson, M. P. (2006) Conflict and Control: Gender Symmetry and Asymmetry in Domestic Violence.

¹⁷ Hester, M. (2009) Who does What to Whom? Gender and Domestic Violence Perpetrators.

¹⁸ Dobash, R. P. and Dobash, R. E. (2004). Women's Violence Against an Intimate Male partner: Working on a Puzzle. British Journal of Criminology.

¹⁹ Swan, S. and Snow, D. (2005). The Development of a Theory of Women's Use of Violence in Intimate Relationships.

We would argue very strongly that there should be separate strategy to assist male victims, and that in order to fulfil its international obligations and legal duties, the Welsh Assembly Government must introduce a gender-specific violence against women strategy. A gender-neutral approach, such as the one that currently exists in Wales, has potentially far-reaching and dangerous implications for resource distribution and social justice for some of the most disadvantaged groups of women in Wales. It is also an approach which is now out of date, and most other countries are moving towards a gendered approach. Scotland already focuses on a gender-specific framework, recognising violence against women as 'one of the most sensitive indicators on gender inequality'²⁰, and the Home Office has recently consulted on this in England.

It is crucial that a response to male victims is well thought through, strategic and truly male victim-centred. A reduction in violence will not be achieved if the response mimics existing women's services or is delivered at the expense of women's services. A gender-neutral approach only serves to disadvantage both women and men and does not support the Assembly Government's commitment to citizen-centred services.

4.7 All Forms of Violence

The Assembly Government's newly published consultation document on a potentially new strategy also remains heavily focused on domestic abuse. Such strategies completely fail to effectively tackle other gendered forms of violence, such as sexual assault, FGM or trafficking, whilst also failing to correctly recognise the links between different forms of violence and their gendered nature, and that such violence is situated within a context of wider unequal gender relations.

There is clear evidence of connections between different forms of violence against women. The Home Office's British Crime Survey 2005/6 indicated that 40% of women who had experienced intimate violence (i.e. stalking, partner abuse and family abuse) since the age of 16 had experienced intimate violence by two or more offender types (e.g. partner, family member, other known and stranger). Nearly half of women (48%) who had been victims of intimate violence since their 16th birthday reported having experienced more than one type of intimate violence.

Scotland is again exemplary in its acknowledgement of the connections between different forms of abuse, both in its national strategy and in its guidance for practitioners: 'It is important that agencies understand the connections between different forms of violence, and their impact, to inform appropriate planning and service provision'.

4.8 Gaps between Departments

There are some good examples of specific links between departments and services within the Assembly Government. The Minister for Social Justice, for example, has established a cross-departmental working group to ensure that there is proper engagement with the health service on the development of SARCs. There continue to be, however, many gaps between areas of public policy and service delivery.

Further action, for example, is required to link action to tackle violence against women to the Health and Homelessness Strategy and Action Plan, in order to ensure that there is a consistent and accessible service for mental health, substance misuse and counselling for women and specifically for children who have suffered domestic abuse. The waiting lists for these services across Wales vary according to location and function from 3 months to 2 years, increasing problems for women seeking to rebuild their lives following violence. Many mental health services are discriminating against women and children in refugees due to the transient nature of domestic abuse.

Another example is the continuing problems in access to primary care, as many GPs refuse to take patients that will be a burden on their finances because they have long-term illnesses, mental health or alcohol issues. Welsh Women's Aid demonstrated that 20% of women have problems accessing a doctor²¹, 9% a dentist, 8% mental health agencies as well as counselling, drug and alcohol and other services. Some 3% of children do not have access to a doctor, 6% a dentist and 3% schooling, as well as counselling and mental health services.

Yet another example is linking action on violence against women to the Child Poverty Agenda. Children from households where domestic abuse occurs are at high risk of poverty, do worse in the education system and suffer from poverty of opportunity when compared to children from non-violence backgrounds. A cross-government approach to tackling violence against women would also contribute towards helping the Welsh Assembly Government to achieve its targets on eradicating child poverty in Wales by 2020.

²⁰ Scottish Executive (2009) National Training Strategy for Violence Against Women, Phase II, March 2009-20011.

²¹ Welsh Women's Aid (2007) Annual Statistical Report, April 2006 – March 2007.

Where links are made, it generally involves the health/social care, social justice and education departments, but violence against women can have a devastating impact on all parts of a woman's life, and therefore all departments must be involved in the fight to tackle violence.

4.9 Post-Devolution Links with UK Government Departments

All organisations working in this sector have come across difficulties in delivering services because of the complex nature of violence against women and the complex nature of the devolution settlement. Elements of the criminal justice system, the victim support system and the realm of public awareness are both retained and devolved.

Again, there are good examples of inter-government working, with devolved service practitioners working with Home Office, Ministry of Justice and the Police to have a network of Multi-Agency Risk Assessment Conferences (MARACs) and 11 Specialist Domestic Violence Courts (SDVCs) to provide support for victims at different stages of the criminal justice system and beyond.

A clear example of how the complexity of the devolution settlement can hamper the protection of women in Wales includes direction on women with no recourse to public funding. The issue straddles immigration and local government provision. In order to provide clearer guidance, the Home Office sent a joint letter with the Department of Communities and Local Government to the chief executives of all local authorities in England. No such letter, which would have to have been sent in conjunction with the Welsh Assembly Government, was sent in Wales. Such matters can reflect a poor understanding of devolution in Whitehall, or obstruction from officials or Ministers in Whitehall or Cathays Park. Whatever the underlying reason, women in Wales probably received less protection from violence as a result.

Having finally persuaded the Home Office to look again at its strategy for tackling violence against women, and welcoming a more strategic, integrated approach; the women's sector in Wales was very disappointed that the Home Office consultation on the matter took place only in England. At a recent meeting to discuss the matter in Newport, the Home Office sent a representative, but there was no representative from the Ministry of Justice.

The devolution settlement restricts the effectiveness of a Home Office-driven approach in Wales so it is vital, in order to retain the highest level of protection and provision for women in Wales, that the Welsh Assembly Government lead on the development and delivery of an integrated strategy to tackle violence against women in Wales. It can provide the political, administrative and funding leadership for Wales, directing services for women at a national level in Wales, whilst also developing effective partnership agreements with the CPS, Police, Borders and Immigration Agency and other UK Departments operating in Wales.

4.10 Towards an Integrated Approach

Considerable evidence suggests that fragmented policy actions have proved ineffective in reducing the prevalence of violence against women in Wales, and that an integrated, cross-government approach is required in order to achieve the Assembly Government's stated aims of protecting women from violence in Wales. The End Violence Against Women coalition has been actively campaigning on this matter in the UK and their 2005 report *What a Waste*²² outlined five fundamental premises for whole government approach to tackling this issue, with further in-depth analysis of such an approach in the 2008 document *Realising Rights, Fulfilling Obligations*²³. The principles outlined are:

- There are connections across all forms of violence against women – they are committed overwhelmingly by men known to the victim, across public and private contexts, are human rights violations and both a cause and consequence of gender inequality
- The prevalence of violence and abuse in the lives of girls and women is extensive – affecting at least half of all females over their lifetime – and shows little sign of decreasing over the short term
- The costs – to women and girls, societies, communities, families and the public purse – of ineffective responses represent a waste of potential in individual lives, for communities and nations.
- The demand for support and services will remain at the current level or increase over the next five to ten years
- Simply extending current forms of provision will have little, if any, impact on prevalence; to decrease violence against women requires an approach that makes prevention a central and long-term focus.

The End Violence Against Women coalition have also described 'integrated' as at a minimum referring to:

- Addressing all forms of VAW simultaneously, combining the current disparate initiatives
- Highlighting connections between all forms of violence and abuse, including the underlying causes, short- and long-term impacts
- Mainstreaming VAW across all government departments, with Action Plans and ongoing evaluation on actions from all departments (as is the case in many other European countries)
- Encouraging and enabling integration in specific policy areas such as prevention and public awareness and in activities such as multi-agency fora

As an expert group of organisations in Wales working in the field of violence against women, we agree with these findings and believe very strongly that only a strategy with measurable outcomes based on the cross-government, integrated approach will have any impact on reducing the violence experienced by women in Wales.

In order to achieve a truly integrated approach and give a strong policy steer across the range of forms of violence faced by women in Wales, a series of shifts in perspective and response are urgently needed, from:

- Domestic violence to VAW
- Reactive to proactive responses
- Margin to mainstream
- Silos to cross-departmental initiatives
- Response to prevention
- Criminal justice framework to equalities and human rights framework.

An integrated approach to all forms of VAW should begin from a clear vision or overall statement, such as 'Ending Violence Against Women: Creating Equality and Social Justice; Delivering Human Rights'. This long-term ambition would be in line with UN and EU policy, make explicit the crucial importance of prevention in the approach, and underline that delivering it requires (and would contribute towards creating) gender equity.

An integrated approach must take into account both short-term (victim support and perpetrator sanctions) and long-term (reducing and ultimately ending VAW and promoting gender equality) goals. It should not entail duplicating good work where it already exists, but provide a framework under which existing work and resources would sit. Previous approaches to tackling violence against women in Wales have been fractured and inadequate, with no vision of actually ending violence against women, and an assumption that abuse of women and girls is a fact of life. A truly integrated strategy for Wales also necessitates close working with the UK Government on areas that are non-devolved. Strong leadership is required from the Assembly Government and close working with the women's voluntary sector in Wales.

5 PREVENTION: Reducing Violence

5.1 Challenging Attitudes

One of the reasons that the prevalence of violence against women remains so high is that attitudes in society that tolerate the level of violence have not changed over time. Polls undertaken by Amnesty International and the End Violence Against Women coalition demonstrate that a third of people in the UK believe that a woman is partially or wholly responsible for being raped if she is wearing revealing clothes, if she has been drinking or has had many sexual partners. A similar poll amongst 16-20 year olds, and another amongst students in Wales provided very similar results on questions relating to the prevalence and tolerance of violence, suggest that young peoples' views on violence against women are not changing in the same way as attitudes towards other issues such as race or sexuality. The polls also indicate that most people are not aware of the extent of violence, and are not aware of the support services available to tackle violence or its impact.

It is vital that the Assembly Government invests leadership as well as public funding in a communications campaign that focuses on prevention through attitude change, in order to ensure that violence against women becomes unacceptable and levels of tolerance towards violence against women are diminished. Some investment has been made in publicising the hotline service for victims, but there has been no major, comprehensive campaign that specifically targets men in relation to changing attitudes and prevention.

There are a number of different models that could be considered in this area. The White Ribbon campaign, where men pledge not to tolerate violence against women could be one element, although a long-term, high profile campaign to ensure that drink-driving is seen as taboo is the model we should try to replicate. Government-led attitude campaigns can be very successful, such as those on smoking cessation and drink driving. They are most effective when combined with independent expertise and independent endorsement. Specialist marketing expertise on how to effectively target young men should be a requirement for such a campaign.

Wales compares very poorly with Scotland in this regard. The Scottish Government has invested in comprehensive public campaigns such as one focusing on zero tolerance of violence against women, which used online, billboard and TV marketing channels.

5.2 Education Programmes

This aspect of prevention – educating young people about healthy relationships and working with children who may have experienced abuse in the family – is an area that illustrates the gap between strategy and implementation. The All Wales Domestic Abuse Strategy did lead on to guidance for schools on dealing with domestic abuse, but the follow-up to ensure that the guidance is used across Wales is not adequate.

The preventative programmes it advocates are limited to education on domestic abuse, with PSE (Personal and Social Education) lessons in schools that are focused purely on gender issues within relationships, rather than wider issues of gender equality.

The Assembly Government recently noted that 97% of schools are now receiving domestic abuse education, but the huge variation in provision and providers in this area means that there is significant inconsistency in the age that children receive this service, who provides the information and the nature of the input. In one school there may be a 20 minute slot about domestic abuse as part of the 'Crucial Crew' programme with a worker presenting information to up to 100 children and young people at a time, whereas in another school there may be several lessons devoted to the topic working with a single class where pupils have plenty of opportunity to explore the issues and seek appropriate support.

Some 1001 children were accommodated in Welsh Women's Aid refuges in 2006/7, and of these 41% were identified as having been abused. Out of this number 16% had experienced physical abuse, 97% emotional abuse, 55% psychological abuse and 2.5% sexual abuse. The ability of some providers to give ongoing support to those pupils who do disclose abuse as a result of awareness raising work is very problematic. Teachers currently receive no training on domestic abuse issues, let alone other forms of violence against women, even though they may be the first person that children seek out.

The main thrust of the education programme is domestic abuse, and it is clear that this should be expanded to tackle all forms of violence against women. Violence against women is inextricably linked to wider attitudes that devalue women, and schools can play a crucial role in challenging these attitudes. Teachers should receive training from specialists in the field in order to teach pupils about healthy relationships and the unacceptability of violence. This is again in accordance with CEDAW's recommendations that the UK and its devolved nations 'implement awareness-raising and education campaigns' to tackle violence against women²⁴.

²⁴ CEDAW Committee (2008) Concluding Observations of the Committee on the Elimination of Discrimination Against Women: United Kingdom of Great Britain and Northern Ireland.

Teachers should also be aware of risk factors for forms of violence such as trafficking, FGM and forced marriage as they are key to preventing such practices, but it has proved difficult to tackle these issues in schools in Wales.

New guidelines, for example, have been developed by the Forced Marriage Unit (a joint Foreign & Commonwealth Office and Home Office Unit) in collaboration with other UK government departments, the Association of Chief Police Officers, Crown Prosecution Service and the Welsh Assembly Government. There is little evidence, however, to suggest that these guidelines have been widely implemented in schools in Wales.

Anecdotal evidence suggests that teachers still do not have an adequate understanding of VAW issues that affect the BME community in particular. One example is a schoolteacher who contacted a pupil's parents because she believed she was at risk of FGM. This may have put the girl in further danger, or at least certainly would not have helped the girl, as parents are overwhelmingly the arrangers of FGM.

In 2008 BAWSO undertook a survey of schools, health professionals, women's groups and other professionals regarding training. Of the 63 respondents, only 7.9% of practitioners' organisations had undertaken training on FGM or had a policy on dealing with the issue.

Relationships education should be a permanent regular feature, rather than consisting of one-off sessions. If this begins in primary school, it could provide the groundwork for the depth of the subject to increase with the age of the pupils, so that by the time they reach secondary school they can tackle issues around VAW. While the content needs to be tailored to young people's maturity, education programmes need to cover the range of linked issues underpinning VAW, including sexual stereotyping, links between pornography and gender-based violence, and attitudes to sexuality.

Cultural education should be included such as critical thinking about the media; should focus on the differences between religious requirements and cultural expectation; and should be delivered from a human rights and gender equality perspective. A lack of education on gender equality and violence against women has allowed certain forms of sexism to not just re-emerge, but become normalised; as a result, the priority should now be to establish and promote new norms consistent with gender equality.

Education is emphasised time and time again by experts in the field as crucial if violence against women is to be reduced and eradicated, and resources currently being poured into the criminal justice system (despite chronic underreporting) would be much better spent on preventative work within the education system.

5.3 Community Safety Initiatives

The previous All-Wales Domestic Abuse Strategy focused heavily on Community Safety Partnerships - seen as key to delivering the strategy. There is no doubt that investment in this is to be welcomed, but it is difficult to evidence whether Partnerships have had an impact on the prevalence of violence against women, and it is clear that the focus has been entirely on domestic violence.

Each local authority area has a domestic violence coordinator funded by the Welsh Assembly Government to take this forward. Situating domestic violence within Community Safety Partnerships means that on a local authority level the domestic violence agenda is driven by a criminal justice focus. Domestic Violence services have to fit in to the same Home Office objectives as those for anti-social behaviour and burglary which are very different in their criminal nature. Actions regarding domestic violence within community action plans are not always assimilated with the actions, if any, in the local authority gender equality scheme.

In tackling violence against women in all its forms, policy makers must ensure that these Partnerships are seen as having an impact within their limited reach, and cannot deliver reductions in violence across the board.

5.4 Perpetrator Programmes

Addressing the perpetrators of violence must be a key part of an effective strategy to reduce the prevalence of violence. Recent research at the University of Bristol found that the risk of perpetrators re-offending is high, with half involved in at least one more domestic abuse incident within a three year follow up period, with one in five re-offending against a different partner to the one they were originally reported for²⁵. The research authors identified the impact that adequate perpetrator services can have on reducing re-offending.

There are only a limited number of perpetrator programmes dealing with domestic abuse in Wales: one voluntary/self-referral perpetrator programme and one statutory/probation programme in Wales are listed as members of Respect, the UK membership association for domestic violence perpetrator programmes and associated support services²⁶. While there are perpetrator programmes running under the auspices of probation areas or other non-statutory services, not all offer associated support to partners, a vital element of effective programmes identified in international good practice.

Research has shown that 71% of men who are perpetrators of domestic abuse approach their GP for help, and therefore a co-ordinated approach with the health service, including a coherent strategy for primary care on how to recognise or respond to men who may be violent towards partners, is required²⁷.

There appears not to exist any adequate or clear strategy in Wales to tackle re-offending, and any new strategy to tackle violence against women must have clear and achievable targets in this area.

5.5 Other Prevention Programmes

While recognising that MARACs have successfully addressed very high risk cases where all the necessary agencies are fully engaged, it is also critical to recognise that the risk of domestic violence towards women is not static. Early intervention and low- to medium-risk services are also invaluable in preventing the escalation of risk. Low- and medium-risk services need support so that a high-risk situation can be avoided. Women's Aid organisations and other agencies run programmes which assist women with a lower risk rating, giving them the support to leave a relationship safely, assisting them in starting again and providing counselling.

Projects such as the Freedom Programme give abused women the information to recognise an abusive situation and prevent the cycle of women entering into numerous abusive relationships. The Freedom Programme has been recognised as a mechanism in preventing repeat victimisation and is recommended by children's services in regards to ensuring mothers have the tools to prevent placing their children within an abusive situation. Projects like this are as invaluable in reducing the risk to women and children alongside the MARAC process to ensure that domestic violence is addressed in a seamless and holistic manner.

Again, the focus of this programme is domestic violence only.

²⁶ End Violence Against Women (2007) Map of Gaps: The Postcode Lottery of Violence Against Women Support Service.

²⁷ Hester, M. et al (2006) Domestic violence perpetrators: identifying needs to inform early intervention.

6 PROTECTION: Keeping Women in Wales Safe

6.1 Justice and Prosecution

The UK Government has introduced improvements in some elements of the criminal justice system in order to tackle violence against women, but there is a considerable amount of work to be done to ensure that the system protects women in Wales. More appropriate sentencing, more pro-arrest policies and tackling conviction rates have seen some progress, but require a great deal more.

We must also caution against focusing too heavily on the criminal justice system, as much violence against women goes entirely unreported. The latest Home Office statistical bulletin²⁸ stated that only 16% of women abused by their partner reported the abuse to the police, and only 11% of sexual assault victims report the assault to the police. The main reason given for not reporting the serious sexual assault to the police was that they did not want more humiliation (24%) or did not think the police could help (22%). There is no specific offence of domestic abuse, and as a result it is very difficult for the criminal justice agencies to collect relevant data surrounding such offences.

It is likely that any further direct changes in Home Office policing/justice policy will have the same results in Wales. However, there are significant elements that may not, such as programmes to challenging attitude and awareness campaigns that may be limited to England (in line with the current Home Office consultation). A recent strategy to tackle violence against women by the CPS did not mention the Assembly Government and its policies, but was based only on links with UK Government departments. It is in such cases that the political and policy leadership of the Assembly Government must take the lead in delivering an overarching strategy to protect women in Wales.

We must ensure that the strategic action on protecting women from violence in Wales does not rely entirely on Home Office programmes. While there is some positive activity in this area, a broader view is often required. An example is the welcome use of Multi-Agency Risk Assessment Conferences (MARACs) to provide assistance to women who are at high risk of suffering domestic abuse. This only supports a very small percentage of women experiencing domestic abuse, perhaps 10%. As MARACs have matured and more agencies are engaging fully, the limitations on capacity and resources have increased and MARACs have had to raise the number of risk assessment indicator points that need to be identified in order for a referral. This is narrowing the remit of MARACs even further. A wider range of programmes must be available in Wales to help other women.

Wales has 11 Specialist Domestic Violence Courts (SDVCs). The SDVCs have led to an increase in conviction rates, a fall in the number of victims retracting their statements and an increase in the number of perpetrators pleading guilty to the offence²⁹. However, while the SDVCs have been successful, research shows there is a difference between what the criminal justice system sees as a success and what victims see as success³⁰. The best outcome for the victim may be a greater understanding of the criminal justice system; that the crime that they have experienced is recognised but that they may not want their partner/ex-partner punished by being sent to prison. Advocacy is an essential aspect of the process to get victims views across to the Court and monitoring both criminal justice outcomes and victims' outcomes are extremely important.

The responsibility for SDVCs was passed to Local Criminal Justice Boards (LCJB) in April 2009. Steps need to be taken to ensure SDVCs are sustainable. The National SDVC Manual proposes a SDVC Coordinator is employed to ensure the smooth running of the SDVC and to collate and analyse data to monitor the effectiveness of the court. Currently there are few SDVCs with coordinators and there is no definite funding stream for this role. This is causing other agencies to be stretched to ensure that SDVCs continue to run.

It is key that training programmes for magistrates, prosecution lawyers, witness services and other agencies involved in SDVCs take place. In particular, there needs to be greater awareness-raising of the special measures that can be utilised in order to assist the victim in giving evidence. Anecdotal evidence has shown that these are being refused or not being applied for when they are relevant and are leading to higher attrition rates.

Again there is a heavy focus on domestic violence, with more work required in other areas. The 2008 CEDAW Committee report noted that although FGM had been prohibited in the UK since 2003, no prosecutions had actually been undertaken. It called on the UK Government to ensure the full implementation of legislation to prohibit FGM. It also called for more training and programmes for public officials, and in particular law enforcement personnel and health service providers to ensure they are sensitised to the issue and can provide adequate support.

The four police forces in Wales have a mixed record on tackling violence against women. There is some excellent work being undertaken in some very complex areas, and yet the conviction rate for rape in Wales remains at 8% on average, and varies between 6.9% in Dyfed-Powys to 9.7% in North Wales.

²⁸ Home Office Statistical Bulletin (2007) Homicides, Firearm Offences and Intimate Violence 2006/ 2007.

²⁹ CPS Domestic Violence (2007) Monitoring Snapshot; cases finalised in December 2006.

³⁰ Robinson, A (2007) Measuring what Matters in Specialist Domestic Violence Courts.

Confidence in the criminal justice system is also extremely low. Since 1980, the total number of rapes reported to the police has increased tenfold – but the rape conviction rate in the UK has dropped from 1 in 3 in 1980 to 1 in 20 in 2005.

There is a new structure being developed to encourage joint working in Wales on some policy areas, and it is vital that any Assembly Government strategy to tackle violence against women explores this structure to its full potential.

6.2 Training for Professionals

There is no doubt that one of the main elements of protection that requires urgent attention is training for professionals, not only for police officers, but also for healthcare professionals, education professionals, local authority officers and officials across government departments and public bodies. Training should be available on identifying victims and sources of assistance, not just regarding domestic abuse but on all forms of violence. The training must be of high quality, ensuring minimum standards of care, and it should be continuous, rather than one-off events.

There are widespread concerns about the tolerance of violence against women, and significant gaps in knowledge. One example is the huge inconsistency in understanding of trafficking for the sex trade, in terms of both identification of victims and the general ad-hoc nature of police ‘oversight’ of the sex trade.

Prevalent attitudes within our communities on violence against women may be reflected amongst professionals. An Amnesty International poll (2005) found that 30 per cent of the public think that a woman is at least partially responsible for being raped if she has been drinking alcohol, and 22 per cent if she is wearing revealing clothes, or has had many previous sexual partners.³¹ This ‘blame the victim’ culture must be challenged, not reinforced, through public awareness campaigns.

A recent unfortunate example reinforces this point. The head of Gwent’s newly formed Serious Sexual Offences Team commented on the Home Office-funded ‘Rape: Short Word, Long Sentence’ campaign: ‘our message will be one of awareness and understanding of how vulnerable alcohol can make you’. This shows a worrying tendency among the police to blame the victim, and is in stark contrast to Scotland’s exemplary ‘This is Not an Invitation to Rape Me’ campaign, which states: ‘MYTH: a woman raped after consuming alcohol is to blame for not considering her own security’.

7 PROVISION: Supporting Survivors

7.1 The Refuge Sector and Supported Housing

Supporting People is a policy and funding framework for delivering accommodation based support to vulnerable people, such as women fleeing violence, in different types of tenures. The provision is intended to allow the service user to obtain and maintain independent accommodation and support is tailored to the needs of the service user within the allowed framework. For women at high risk experiencing and/or escaping domestic violence this will often mean a period of time within a refuge where specialist refuge support staff will provide advice, practical help and advocacy as part of a package of individual support.

This revenue stream, administered through contracts, is the keystone to funding of domestic violence services and as such must be recognised as fundamental to the sustainability and ongoing evolution of services to women experiencing or escaping domestic violence. Any changes to Supporting People either in terms of policy or funding (removing tariffs for example) must be evaluated and impact assessed from the perspective of women escaping domestic violence.

Although there is an enhanced tariff payment for children (within supported accommodation) this is neither intended nor can it provide specialist services to children within refuge. A further review of how services to children within refuge can be core funded on a per head basis (in line with the adult tariff) must be a priority.

The overall level of funding available at a local level over time is also unpredictable. A planned review of the distribution of funds to local authorities will have an impact on services that is unclear, and can only be clarified by strong national guidance. This is already evident in England, where the removal of ring-fencing has directly reduced the quality of service provision. Scottish Women's Aid has also recently warned of weaker national guidance impacting on the geographical provision of services at a local level³².

7.2 Alternative Housing

Rebuilding the lives of women and children who have had to flee violence relies not only on short-term or emergency refuge, but also on the availability of longer-term alternative housing for women. The lack of accommodation and social housing has led to the women and their children having to remain in refuge for longer periods of time, with a direct impact on the space available for vulnerable women.

The main problem, as with other services, is the inconsistent level of service from local authorities across Wales. Some local authorities are not using the guidance and legislation available to provide an adequate service in finding alternative housing for women and this can often exacerbate distress.

7.3. Sexual Assault Services

Some services to assist survivors of sexual assault have improved, but others have become more uneven and difficult to access. The introduction of Sexual Assault Referral Centres (SARCs) is to be very much welcomed. There are four SARCs in Wales, managed in partnership by health authorities and police services, with the aim of enhancing the care of survivors and improving forensic services.

There is, however, only one Rape Crisis Centre which presently is under significant financial threat. This Rape and Sexual Abuse Support Centre is based in Caernarfon but provides specialist support, counselling and training services to women and men across North Wales. The Centre has been established for 25 years. Three quarters of its work consists of referrals from the Police and NHS. It is a key partner in the North Wales SARC, providing adult support and counselling services, and without it, it would be impossible for the SARC to continue to provide those services. Funded jointly by the Assembly Government and the Home Office, its funding totals less than £100K and must be applied for annually. Its funding is currently under threat.

Overall, funding for Rape Crisis Centres has dramatically decreased, and some two thirds of centres in the UK have closed since 1985.

Lack of funding has led to the closure of Wales's helpline for victims of rape and sexual violence, and this needs to be readdressed as a matter of urgency. Rape Crisis Centres (RCCs) are needed as well as SARCs to provide an integrated service for survivors of rape³³. SARCs provide an immediate service for victims of rape in order that they can be treated effectively, in terms of medical care, forensic examination and the criminal justice system, whereas Rape Crisis Centres tend to provide long-term counselling for women and can deal with historic cases of rape. The need for both services is extremely important for women who have experienced sexual assault.

³² Scottish Women's Aid (2008) Analysis of Local Authority Single Outcome Agreements.

³³ End Violence Against Women (EVAW), Rape Crisis (England and Wales), Child & Women Abuse Studies Unit (CWASU) and Fawcett Society (2008) Not Either/Or but Both/And: Why We Need Rape Crisis Centres and Sexual Assault Referral Centres.

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There are 52 violence against women support services in Wales, and the majority of these services (38) are designed for women experiencing domestic abuse.

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Rape continues to be used as a weapon of war and persecution around the world. The continuation of funding for Rape Crisis Centres that provide support with historic cases of rape is therefore essential for refugees and asylum seeking women fleeing rape and gender-based violence.

Access to core funding and the geographic spread of services remain real issues in assisting victims of sexual violence³⁴.

7.4 Geographic Gaps in Services

Tackling the inconsistency in the pattern of provision of specialist services should clearly be one of the main objectives of any new Assembly Government strategy. There is patchy provision from direct Assembly Government projects as well as those delivered by local authorities, other statutory organisations and the third sector in Wales.

The first Map of Gaps report commended the Scottish Government's strategic approach that allocated ring-fenced funding, noting 'it is apparent that where government steers provision a more consistent geographical spread is possible. In contrast, where decisions are left to localised decision-making the postcode lottery is reinforced'. Recently, however, the Scottish Women's Aid report on Single Outcome Agreements – the agreements between the Scottish Executive and the 32 LAs in Scotland – showed that a change in government policy to stand back from central direction may be weakening this provision. It showed that 9 local authorities had no reference to domestic violence within core strategies, with varying priority given within the remaining 23.

The Map of Gaps reports published by the End Violence Against Women coalition accurately map specialist provision for women, and it is very clear that women who live in rural areas are less well served than urban areas³⁵. Recent independent research undertaken by Bristol University on behalf of the National Federation for Women's Institutes has reiterated the need for different approaches in rural areas – showing that violence was as prevalent in rural areas but that women may approach different sources for advice³⁶. Rural women specifically emphasised the role of health practitioners in providing advice to women. They also faced issues related to transport and concerns over confidentiality in their communities.

The current Domestic Abuse Action Plan in Wales and the draft Violence against Women strategy provide no action for the Rural Affairs Department within the Assembly Government and in no way tackle the sparsity of services available.

7.5 Forms of Violence – Gaps in Services

A new integrated strategy in Wales must effectively focus on all forms of violence, and it must be ensured that extending services to tackle currently under-represented victims of violence must not reduce the available resources for dealing with domestic abuse, nor expect specialists in domestic abuse provision to be able to deliver across all forms of violence.

Though some funding has been made available in Wales to help victims of other forms of violence, it is piecemeal, non-strategic and not delivered on an all-Wales basis. Effective programmes must be established to support the victims of trafficking for the sex trade, FGM, forced marriage, sexual assault and honour-based violence.

There are 52 violence against women support services in Wales, and the majority of these services (38) are designed for women experiencing domestic abuse. While Wales has a number of domestic abuse services, we have no services for BME women in Mid or West Wales, one rape crisis centre in North Wales, and one service for women experiencing prostitution, trafficking and sexual exploitation. The Map of Gaps indicates that 'in Wales, strong domestic violence provision... indicates that the domestic abuse policy has had an impact. However, the lack of voluntary / third sector sexual violence services suggest that this needs to be extended to all forms of violence against women'³⁷.

On trafficking, for example, a 2007 Amnesty International report estimated that at any one time there are 60 sex-trafficked women in Cardiff alone, and that trafficking for the sex trade remains far from being a city-only problem, with victims found across Wales, including in rural areas³⁸. At a UK level, though not all had been trafficked, recent research has found that only 19% of women working as prostitutes in flats, parlours and saunas were originally from the UK³⁹. Though some funding was set aside for a refuge for trafficked victims, it seems that this has yet to be delivered, and may not provide the specialist service for trafficked victims, but may also deal with prostitution more generally, despite the different needs these groups may have. Action must be taken by the Assembly Government to ensure that there is

³⁴ Ibid.

³⁵ End Violence Against Women (2007) Map of Gaps: The Postcode Lottery of Violence Against Women Support Services.

³⁶ McCarray, M and Williamson, E (2009) Violence against women in rural and urban areas, National Federation of Women's Institutes.

³⁷ End Violence Against Women (2007) Map of Gaps: The Postcode Lottery of Violence Against Women Support Services.

³⁸ Amnesty International (2008) Under the Covers: Trafficking for Sexual Exploitation in Wales

³⁹ POPPY Project (2004) Sex in the City: Mapping Commercial Sex Across London.

a Wales-wide response and that victims of trafficking across Wales have access to secure accommodation and welfare services, as described by the European Convention Against the Trafficking of Human Beings.

On tackling FGM, the 2009 CEDAW Committee report called for increased efforts to design and implement prevention strategies, as well as education and awareness raising programmes involving community and religious leaders, women's organisations and the general public. We know that FGM is very prevalent in particular diaspora communities in Wales, but the lack of awareness of the issue hampers any efforts to eliminate the practice in Wales. There is currently no specialist service dealing with FGM in Wales, despite Cardiff being one of the cities to have been explicitly singled out for concern due to the likelihood of the practice of FGM within its BME communities⁴⁰. In Wales there are a few African communities outside of Cardiff, which presents a further problem in that social workers, health professionals and the police outside of the capital are even less likely to be familiar with FGM or know how to deal with it.

Research on FGM unanimously declares a pressing need to document and map its incidence within specific countries in order to effectively combat it⁴¹. BAWSO have conducted a research project on the extent of FGM in Wales, and the Assembly Government must commit to direct action to tackle this abhorrent practice.

Wales-specific research is also required to consider the impact of stalking. The vast majority of stalkers are male and the most common victims of stalking are female. The British Crime Survey suggests some 19% of women have experienced stalking at some time, and it often happens within the context of domestic violence after the end of a relationship. There is currently no action outlined in the Assembly Government's current consultation document.

An integrated strategy to tackle Violence against women in Wales also needs to address the issue of harassment. There are no Wales-specific figures estimating the prevalence of harassment, though the Equal Opportunities Commission noted that sexual harassment in the workplace is clearly a gendered issue.

There currently exists little Welsh-specific evidence on women seeking asylum in Wales who have suffered violence. Anecdotally, it is clear that many women who are seeking refuge here have suffered from gendered violence, whether sexual assault, FGM or other forms of violence. The asylum system does not adequately reflect violence against women in its processes. One example relates to FGM. The new UK legislation purports to protect women and girls at risk of FGM whether in the UK or in their home country, but it is very difficult for asylum seekers to use protection from the risk of FGM as part of an asylum claim. At a UK level, research has shown that between 2004 and 2007, 78 cases were recorded of women suffering violence during detention or forced removals⁴². The authorities appear reluctant to investigate such assaults and there is no evidence of any security guards or their employers being prosecuted for such an assault.

Though there is little all-Wales evidence available regarding forced marriage and honour-based crimes, South Wales Police have assisted a number of victims. In 2007, there were 26 reported cases, increasing to 32 in 2008. In the first 6 months of 2009, 11 cases have already been reported. Progress in this area in Wales seems to be entirely focused on criminal justice issues, with little focus on the services available for women who suffer this form of violence.

7.6 Socio-Economic Barriers and Women with Complex Problems

Any new strategy in Wales to tackle violence against women must be comprehensive, rather than purely reiterate services that already exist. It is vital that the links are identified between violence against women and poverty and deprivation, and other socio-economic factors such as ethnicity, immigration status, age, disability and sexuality. Many of the women at greatest risk of suffering violence, and yet with significant obstacles to face, have complex issues such as mental health issues, substance misuse problems, or other factors that can worsen their prospects for protection.

In terms of age, there is no adequate provision for women aged 16-18 seeking help, or for older women who are victims. Such women at either end of the age spectrum often fall between policy silos, and therefore miss out on services. For example, Welsh Women's Aid research indicates that in 2006/7, some 416 of the 1311 victims of domestic abuse housed in refuges were under 18. Young women who directly seek refuge support as victims of violence are funded under the Extending Entitlement framework managed by the Department for Children, Education, Lifelong Learning and Skills, rather than the Department of Social Justice and Local Government that is responsible for the Supporting People framework. Support for young women may also fall under the Department of Health and Social Services policies.

⁴⁰ Waris Dirie (2005) *Onze verborgen tranen*.

⁴¹ See, for example, UNICEF, *Female Genital Mutilation/Cutting: a Statistical Exploration* (2005); FORWARD, *Study A Statistical Study to Estimate the Prevalence of Female Genital Mutilation in England and Wales*, (2007); recommendations by the British Medical Association and WHO.

⁴² Bimberg Pierce and Partners, *Medical Justice and the National Coalition of Anti-Deportation Campaigns* (2008), *Outsourcing Abuse: the Use and Misuse of State-Sanctioned Force During the Detention and Removal of Asylum Seekers*.

There have been some examples of inconsistent services as there can be a disagreement between the police and local authorities as to whether violence suffered by young women aged 16 to 18 is treated as a child protection case or as domestic abuse. Refuge services are generally divided into adult and children's services with only a few groups having specialist funding for working with young people 11-25 years.

Help the Aged reported that older women are less likely to report their experiences than any other age group. Their report highlighted a lack of services for older women and confusion around domestic abuse and elder abuse⁴³.

In regards to mental health, women who have experienced domestic abuse are at least three times more likely to experience depression or anxiety disorder than other women and between 50% and 60% of female mental health service users have experienced domestic abuse⁴⁴. In 2006 – 2007, 17% of women in refuges in Wales had mental health issues and 4% of women self harmed⁴⁵. Asian women are significantly more likely to suffer from mental health issues, including self-harm and attempted suicide, and need specialised support plans that can offer intensive support.

Research also shows that women who have escaped a trafficking situation suffer considerable mental health service problems, with 56% of women experience sufficient symptoms that are suggestive of PTSD⁴⁶.

Disabled women are twice as likely to experience domestic abuse than non-disabled women⁴⁷ and 6% of women in refuges in Wales were disabled in the year 2006/07⁴⁸. The findings of the first national study of domestic violence and disability, published this year, concluded that 'disabled women experience a greater need for services, accompanied by far less provision, and therefore lose out on both counts'⁴⁹. Disabled women can fall through the gaps of service provision, because mainstream VAW services may not have the resources to deal with the specificities of abuse against disabled women, while 'very few organizations for disabled people consider dealing with domestic violence to be part of their remit'.⁵⁰

The research found that perpetrators of abuse against disabled women included intimate partners, carers and family members. Women's impairments were frequently used in the abuse, such as through humiliation, belittling and reinforcing dependency. Sexual violence was also proportionately more common for disabled than non-disabled women. Furthermore, many disabled women who reported abuse were often disbelieved, not taken seriously, or made to feel guilty or ungrateful.

The report recommended that measures should be taken to raise awareness of violence against disabled women; that domestic violence organisations and disability organisations should work in partnership to meet the needs of such women and to learn from each other; and that the needs of abused disabled women should be reflected in policy, strategy documents, agendas and frameworks. The Assembly Government should take the lead in addressing the lack of guidance and inadequate provision for this doubly disadvantaged sector of society.

There have been some positive steps in the approach to women with substance misuse problems, and new service framework guidance for victims of domestic abuse published by the Assembly Government is to be welcomed. The intention is to ensure that professionals in Wales plan and deliver services for this vulnerable group, and it is hoped that evaluation of the implementation of this guidance will indicate enhanced provision.

7.7. Funding Gaps in Services

Many elements of services for victims of violence as described elsewhere in this report have no funding allocated at all. Other elements rely on short term funding, with many staff in statutory and non-statutory organisations chasing new pots of funding which could be spent providing vital services to women in need.

One example of a severe funding gap in services is that designed to support children. Nearly half of all residents accommodated in WWA refuges are children. In 2006/7, some 8% of children in refuge were on the Child Protection register (19% of children not in refuge). It can be argued that if these children were not in refuge, they would become 'Looked After' by local authorities at a cost of over £6.5M. Funding for work with children and young people in Women's Aid groups, however, is very piecemeal and insecure. The following table indicates sources of funding for child specialist posts.

⁴³ Flood, I (2004) Older women and domestic abuse, Help the Aged.

⁴⁴ Bowstead, J (2000) Mental health and domestic violence: Audit 1999 (Greenwich Multi-agency Domestic Violence Forum Mental Health Working Group); ReSisters (2002) Women speak out (Leeds: ReSisters); Department of Health (2003) op.cit.

⁴⁵ Welsh Women's Aid (2007) Annual Statistical Report, April 2006 – March 2007.

⁴⁶ Zimmerman, C et al. (2006) Stolen smiles: a summary report on the physical and psychological health consequences of women and adolescents trafficked in Europe, The London School of Hygiene & Tropical Medicine.

⁴⁷ Home Office (1995) British Crime Survey.

⁴⁸ Welsh Women's Aid (2007) Annual Statistical Report, April 2006 – March 2007.

⁴⁹ Hague, G., Thiara, R., Magowan, P. and Mullender, A. (2008) Making the Links: Disabled Women and Domestic Violence

⁵⁰ Ibid.

Refuge & Community	Agency/Charitable Trust	Posts Supported
Statutory	Supporting People	20
	Sure Start/Cymorth	9
	Social Services	16
	Community Safety Partnerships	2
Non-Statutory	Children-in-Need	12
	Comic Relief	1
	Other Charitable	6

A specialist focusing on children within a Women's Aid group is not funded as a core function, and therefore most posts are dependent on charitable funding that requires an annual re-application. Children in Need currently fund, in whole or in part, 15 posts around Wales. The charity, however, has indicated that this level of support is unsustainable.

A significant number of child work posts are funded by the Supporting People Revenue Grant. This funding is housing related, and as such it restricts the activities of the workers. They are not, for example, permitted to carry out any direct support on an individual basis to children with identified needs as a result of the domestic abuse. The funding does not allow for workers to participate in any child protection work, attend any child protection meetings, case conferences etc.

Workers funded by Sure Start may be supporting younger children within a family whilst older children in the same family are not provided with any structured support. This is clearly a very unsatisfactory, unequal, and high-risk situation in which to be working with very vulnerable children.

In Scotland, core funding is provided for two children's workers for each Women's Aid group: for in-refuge and outreach services. A strong argument could be made that this should occur in Wales also, as it costs more to keep a child in care than it costs to fund a children's worker post.

7.8 Women with No Recourse to Public Funding

Many women who suffer violence are caught in a trap as their immigration status means that they cannot access the type of support that local authorities and the third sector can provide. This may include women who come to Wales as students, women from some accession countries or women who marry British Citizens. Women in this situation can usually not apply for housing or welfare benefits in their own right, and therefore this support cannot be used to pay for a refuge placement.

Adequate support and safety for women with no recourse to public funds (NRPF) continues to be a major concern. We recognise that immigration policy is not a devolved area. That said, we believe that the Assembly Government has responsibilities under devolved areas, and under international obligations and the Human Rights Act to protect women and children who live in Wales from violence.

Non-discrimination without distinction is a central tenet of many international human rights treaties to which the UK is a party. Although governments are able to differentiate on the basis of nationality in the pursuit of immigration control, they should not offer less respect and protection to those within their jurisdiction on the basis of immigration status. A non-discriminatory violence against women strategy must ensure that women subject to immigration control are not excluded from all measures available to women who are lawfully resident in the UK, particularly access to vital support services.

Large numbers of women and children still have no access to housing and subsistence support despite vulnerability. Many women are forced to remain in violent relationships or risk destitution. Local Authorities remain inconsistent in how they apply statutory criteria and support for women in this situation remains very much a postcode lottery.

Children also suffer due to this anomalous funding situation. While local authorities have a statutory power to make appropriate provisions for children to ensure that their needs are met, this is subject to interpretation. Some local authorities pay for the housing and subsistence costs for women with children to live in refuge whilst others discharge their duty by taking the children into care.

Lack of funding from local authorities for women in this situation has a direct impact on third sector expenditure. BAWSO have indicated that the total cost to them for supporting women in this cohort is £222K in 2008/9 through cost of refuge, outreach support and subsistence allowance. Some 204 women in Wales have been supported in this way over the last three years. In 2008/9, 40% of BAWSO's service users who were fleeing domestic violence had no recourse to public funds. Forty two women remained on BAWSO's waiting list for space in a refuge.

The 2008 report 'No Recourse No Safety', published by Amnesty International and Southall Black Sisters, suggests that the UK Government and devolved administrations are failing in their international obligations to provide essential services to protect women from abuse, whatever their immigration status. The authors called on the Assembly Government to guarantee women in this category access to accommodation and support by immediately providing emergency funding and directing public authorities in Wales to provide a means of support for women and their children fleeing violence.

The Welsh Assembly Government has no specific policy to deal with women in this cohort who live in Wales and are suffering from violence, other than to follow the pattern in England. Some new proposals from the Home Office suggest refuges that house NRPF applicants will receive a retrospective payment of a up to 5 weeks accommodation costs, with a cap of £1000. These proposals have been rejected by leading women's organisations as the pre-application process alone takes 3-6 months. It seems clear, therefore, that the current proposals will mean that many more women will be trapped in a violent situation in Wales, and therefore any strategy to reduce violence against women in Wales must protect women from further violence and deliver a way to provide accommodation for women in this situation.

7.9 Accommodation for Young Men

There is a lack of consistency within the refuge sector regarding provision for young males aged 16-18 years. Women fleeing violence can often only do so if alternative accommodation is found for her and all her children, but many refuges are unable to provide accommodation for teenage boys. The number of refuges who are willing to take older boys has increased over the last three years and is proportionally much higher than in England where many refuges do not take males over 14 years.

That said, some local authorities will not fund the separate bedroom that may be required, and teenage boys may be accommodated at a nearby bed and breakfast, or not provided with alternative accommodation at all. Such uncertainty and possible separation is not helpful in rebuilding the lives of women and children fleeing violence. The impact on young people can lead to additional problems and adolescent boys are in danger of using and experiencing violence themselves, within their own intimate relationships.

Male children over the age of 12 clearly present a unique set of service needs, which needs to be addressed through education at schools and colleges, support and service provision from the voluntary and statutory sector, and national and local government policies to ensure that the needs of adolescent boys are addressed.

8 Delivering an Integrated Strategy

8.1 Measuring Progress

Given the weakness of earlier strategies in identifying progress and targeting resources effectively, it is vital that a new, integrated strategy includes a range of performance indicators, minimum standards and delivery targets against which the strategy can be evaluated. We would expect an annual report against delivery plans in order to gauge whether the strategy has been effective in reducing violence and providing ways of prioritising resources and effort over time.

8.2 A VAW Champion in Government

There is a danger that identifying one minister as responsible for delivering in this area can suggest to other departments that they are not responsible for tackling violence against women. The Assembly Government must ensure that a minister with such a remit must have the power and the accountability to be able to deliver a cross-government, integrated strategy.

Such a champion must ensure the focus is not just domestic abuse. If the responsibility sits entirely within one department, then the delivery plans will not make the connections between all forms of violence against women - that such violence is situated within a context of wider unequal gender relations.

The ongoing problems with joint working between departments and the complete lack of priority on this issue in some departments suggest that action is required to heighten the requirement for cross-government working if the Assembly Government is going to deliver its international obligations. For that reason, we suggest that a senior official or external individual is identified as a Violence Against Women 'Tsar'. This person would ensure that there is constant pressure to deliver at an official level across government.

Alternatively, ministers may wish to appoint such a high profile position outside government. This Commissioner-type role would focus delivery across government departments and also ensure an adequate focus in terms of local authority and other public body delivery.

8.3 Breaking the Silos

Developing strategies that require official input, resources and focus from across all departments within the Assembly Government can be very difficult. On this issue, we must ensure that all policy and delivery forces are brought to bear in order to tackle the inequality of women in Wales. It is vital that all ministers and department heads play their part, and that this is not seen as an issue for one or two departments. This approach is also entirely in keeping with ‘One Wales’, the Welsh Assembly Government manifesto.

It is imperative that all Assembly Government departments are involved in tackling violence against women, which is certainly not the case currently. In the Assembly Government’s Single Equality Scheme, for example, the only reference made to violence against women was in the Department for Social Justice and Local Government’s action plan.

The following table highlights suggested actions for departments

Department	Action Required
Department of Children, Education, Lifelong Learning and Skills	<ul style="list-style-type: none"> • Tackle bullying, including sexual bullying • Challenging attitudes that tolerate violence against women and promoting healthy relationships • Better advice for parents • Better training for teachers to identify victims of all forms of violence against women and provide advice • Ensure programmes continue in further and higher education • Welsh-specific research on young people and violence issues. • Ensure public bodies are delivering appropriately against the gender equality duties in tackling violence against women • Gender equalities education from a young age, to change entrenched attitudes to male/female roles
Department for Economy and Transport	<ul style="list-style-type: none"> • Enhance women’s safety in work places and public transport • Promote workplace programmes to recognise and address violence against women issues. • Ensure public bodies are delivering appropriately against the gender equality duties in tackling violence against women • Adopt gendered analysis and use gender budgeting as a policy and decision-making tool

Department	Action Required
Department of Environment, Sustainability and Housing	<ul style="list-style-type: none"> • Ensure appropriate immediate and long-term housing is available for victims of violence • Enhance public safety of women within the built and natural environment • Ensure public bodies are delivering appropriately against the gender equality duties in tackling violence against women • Adopt gendered analysis and use gender budgeting as a policy and decision-making tool
Department of Finance	<ul style="list-style-type: none"> • Ensure appropriate funding for delivering violence against women programmes within the Assembly Government, local government and public bodies and deliver research and scrutiny on funding. • Ensure public bodies are delivering appropriately against the gender equality duties in tackling violence against women • Adopt gendered analysis and use gender budgeting as a policy and decision-making tool
Department of Health and Social Services Department of Public Health and Health Professions	<ul style="list-style-type: none"> • Recognise violence against women as a cultural determinant of health • Ensure health and social care professionals are adequately trained regarding all forms of violence against women, provide guidance and ensure delivery against guidance. • Providing an effective immediate and long term health and welfare service for victims of violence, including mental health care • Develop stronger partnership working with statutory and non-statutory organisations working to tackle violence against women • Ensure public bodies are delivering appropriately against the gender equality duties in tackling violence against women • Adopt gendered analysis and use gender budgeting as a policy and decision-making tool

Department	Action Required
Department of Heritage	<ul style="list-style-type: none"> • Raise awareness of violence against women issues and their impact on public service delivery. • Deliver partnership programmes in sectors such as sport to tackle links between sporting events and violence against women, or in arts to raise awareness of violence issues. • Ensure public bodies are delivering appropriately against the gender equality duties in tackling violence against women • Adopt gendered analysis and use gender budgeting as a policy and decision-making tool
Department of Rural Affairs	<ul style="list-style-type: none"> • Ensure services are delivered appropriately in rural areas • Ensure public bodies are delivering appropriately against the gender equality duties in tackling violence against women • Adopt gendered analysis and use gender budgeting as a policy and decision-making tool
Department of Social Justice and Local Government	<ul style="list-style-type: none"> • Direct and scrutinise Community Safety Partnerships in Wales-wide violence against women programmes • Direct and scrutinise local authorities in Wales-wide violence against women programmes • Ensure public bodies are delivering appropriately against the gender equality duties in tackling violence against women • Recognise links with child poverty, including women with no recourse to public funding • Adopt gendered analysis and use gender budgeting as a policy and decision-making tool

Department	Action Required
Department of Public Service and Performance	<ul style="list-style-type: none"> • Ensure that performance programmes are fully scrutinising public authorities in delivering programmes to tackle violence against women • Ensure social care, health care and education inspectorates are fully scrutinising delivery of programmes to tackle violence against women • Ensure public bodies are delivering appropriately against the gender equality duties in tackling violence against women • Welsh-specific research on issues relating to violence against women • Adopt gendered analysis and use gender budgeting as a policy and decision-making tool
Constitutional Affairs, Equality and Communication	<ul style="list-style-type: none"> • Ensure public bodies are delivering appropriately against the gender equality duties and Human Rights Act in tackling violence against women • Develop Wales-wide communications campaigns to challenge attitudes towards violence against women • Ensure effective partnership with UK Government Departments to safeguard against constitutional complexities impacting on protection of women.

8.4 Local Authority Provision

One clear pattern of policy and provision is the inconsistency in terms of local authorities in Wales. It is vital that the integrated strategy ensures that those responsible at a local level understand the need for cross-policy responses on all forms of violence against women, and that adequate funding is made available at a local level to combat postcode lotteries.

The Scottish Commissioner of the Equality and Human Rights Commission recently warned that national policy must be reinforced locally, saying “we welcome the Scottish Government’s gendered approach to domestic abuse which recognises that this crime is committed predominantly by men against women, and that women’s experience of violence is intrinsically different to that experienced by men. It is important that this approach is not diluted as local public bodies take this issue on.”

Any new strategy to tackle Violence against Women in Wales, published by the Assembly Government must make clear how it expects local authorities to respond to the new integrated policy approach, and ensure that provision reaches minimum standards across Wales. Given the inadequacy in this area, we believe it is now time for the Assembly Government to provide compulsory direction on local authorities to deliver in this area, using all the powers it currently has to ensure that local authorities comply, and possibly seeking further powers to direct local authorities to tackle this issue.

8.5 Partnership with UK Government Departments

There has been some work at ministerial level with UK Government departments. In Whitehall, UK government action on violence against women is currently led by an Inter-Ministerial Group, chaired by a Home Office minister, with ministers from across the UK Government. At its launch, its membership included three Ministers from Wales. There is currently no evidence in the public domain to demonstrate the efficacy of this approach, though any joint work is to be welcomed. Indeed, it seems from an answer to a written question (WAQ54452) that only one Assembly Government Minister is now a member, and that he does not attend the meetings.

In Northern Ireland, an Inter-Ministerial Group on Domestic and Sexual and Domestic Violence was established in 2008. Chaired by the Health Minister, it also includes ministers for finance, education, social development and the UK's Northern Ireland Minister for Criminal Justice.

Given the need to introduce an integrated strategy in Wales, and the clear direction from the Home Office that their intention is to do so in England only, it is absolutely vital that the Assembly Government take the lead in developing and delivering such a strategy in Wales.

8.6 Partnership with the Women's Sector

Many specialist organisations have come together to prepare this report. Although some of these are also represented on the Welsh Assembly Government's external working group which provides advice to the Community Safety Unit, the view of our expert group is that extensive and more inclusive consultation would have greatly benefitted the first draft of the document which is now out for consultation. This consultation is therefore very welcome. It is our view that the Assembly Government's policy development capabilities in this area would be strengthened by external advisers and better ongoing partnership with specialist organisations.

9 Scrutiny and Evaluation

9.1 WAG Evaluation

It is essential that any strategy in Wales to tackle Violence against Women includes clearly stated outcomes and measurable targets within an operational action plan. Absence of these is one of the greatest shared weakness of the All Wales Strategy on Domestic Violence and the Integrated strategy on Violence Against Women. It must be possible to measure progress and to hold the Assembly Government and other public sector service providers accountable for gaps in provision.

The current draft strategy and action plan is entirely based on outputs rather than outcomes, and could be successfully published without having any direct impact on women's lives in Wales. A serious and immediate rethink of the structure of the strategy is required.

The new Violence against Women strategy for Wales must include operational action plans, with annual delivery targets and a public annual report against which delivery can be scrutinised.

9.2 Independent Evaluation

It is difficult for small women's organisations and service providers reliant on Assembly Government funding to challenge delivery in this area, and there have already been instances of funded third-sector organisations being warned that criticism of government policy in this area is not acceptable.

We believe that some form of external reviewer with a specialism in this area is required to scrutinise the new Violence against Women strategy for Wales, and provide external benchmarking. This is another area where the Tsar would be able to advise and to oversee evaluation activities.

10 Budgets

An integrated strategy to tackle Violence against Women in Wales requires identifiable budget lines for protection, provision and prevention. Otherwise, there will be a constant tension across government departments in delivering their responsibilities.

Extra investment is required to extend the current strategy from one which delivers only in some areas on domestic abuse, to a broader strategy delivering on all forms of violence against women across Wales. An integrated strategy should encourage delivery of services on the basis of need rather than restricted to particular forms of violence, particularly if the strategy fits within the Assembly Governments' citizen-focused framework.

An urgent review of the way the Assembly Government directs local authority funding in this area is required, given that the ring fencing for the Supporting People budgets, which has been the core funding of most refuges, is to be removed, and monies mainstreamed into local authority budgets. There is considerable anxiety about how secure and sustainable this will leave services and whether the importance of funding specialized VAW work is fully recognised, echoed across nation and regions.

The application of gendered analysis and Gender Budgeting would enable policy and financial decisions which are fair and efficient, since it would ensure allocation of funding fairly across the genders according to actual usage and need. Without the provision of additional resources, the current draft strategy and action plan will remain a pledge rather than a realistic step towards eliminating violence against women.

II Conclusion and Recommendations

11.1 Overview

The prevalence of violence against women in Wales remains unacceptably high and shows no signs of reducing in the future. At this stage, there is no evidence to demonstrate that public policy in Wales to date has effectively tackled the prevention of violence or the level of protection afforded to women in Wales. Though there are clear signs in some areas that the commitment of the Welsh Assembly Government has delivered enhanced services for women who have suffered violence, there remain significant gaps in provision and many vulnerable women who have suffered violence either remain in dangerous situations or are not being given the assistance they require to rebuild their lives.

The 2005 strategy (Tackling Domestic Abuse: The All Wales National Strategy) did not include any measurable outcomes or operational plans and there is little evidence that this strategy had a significant effect on the lives of women in Wales. That said, there have been some welcome improvements in service delivery and funding by the Welsh Assembly Government since 2005.

The Assembly Government is currently consulting on a new strategy and action plan, but the draft published to date repeats many of the same weaknesses of the 2005 strategy on Domestic Abuse, with no measurable outcomes, little cross-government integration, and a far too heavy focus on domestic abuse.

The Assembly Government has international obligations to deliver for women in Wales that are not being met. Statutory requirements under gender equality and human rights legislation also compel the Assembly Government to act effectively in this area.

This report has highlighted some of the areas where action is required in Wales, and is based on authoritative consensus within the women's sector, including front-line providers and campaigning organisations. As a sector we know that ministers within the Assembly Government are committed to tackling violence against women and at this time the Assembly Government has an excellent opportunity to redirect its approach and focus more effectively on delivery. Indeed, it would be derelict in its duty to women in Wales if it did not introduce an integrated strategy.

11.2 Summary and Recommendations

The following summary and recommendations are provided, based upon the main themes of the document

POLICY:

- The Welsh Assembly Government strategy and action plan to end Violence against Women must include a clear definition of Violence against women, preferably that adopted by the UN.
- The strategy and action plan must also demonstrate a overall firm intent to end this violence rather than just to treat its symptoms.
- The strategy must be gender-specific, fully comply with gender equality and human rights obligations, include real cross-government delivery, and tackle all forms of violence.
- The strategy must be informed on the best available research from across Wales, the UK and internationally, and a depository of such research must be kept up to date.
- Welsh-specific research is required in areas where there currently exist major gaps in provision and protection. This includes the forms of violence often experienced by women from ethnic minority communities and the impact of violence on women with complex issues.

PREVENTION

- The Assembly Government must take the lead on delivering a broad communications campaign to challenge the pervasive attitudes within society that tolerate the level of violence experienced by women in Wales.
- The programmes within schools and the education system must be reviewed to tackle all forms of violence, promote healthy relationships and to ensure that all school children have access to advice and protection.
- Vastly improved training is needed for professionals – teachers, doctors, nurses, police officers and others, to ensure frontline protection, assistance and advice for women.

PROTECTION

- On matters that are not devolved, the Welsh Assembly government must work closely with the Home Office and UK Criminal Justice system to ensure a consistent and coherent approach.
- The strategy and action plan must make explicit the basic standards of protection and treatment that all women in Wales have the right to expect
- The postcode lottery in protection and provision of services must be tackled decisively, with measurable targets and minimum standards of care to ensure that the criminal justice system and local government effectively deliver real change for women in Wales
- Policy makers should recognise that Community Safety Partnerships only represent a specific part of the fight against gendered violence, and that delivery in this area can only have limited reach, and that a broader response is required.
- A clear strategy to tackle perpetrators and particularly re-offending must be led nationally by the Assembly Government.
- Joint working across the four police forces in Wales must be achieved, with consistent approaches and a clear strategy on tackling all forms of violence against women, in terms of prevention and protection as well as prosecution.
- Measures must be taken to ensure that women with no recourse to public funding and women who are seeking asylum or refugee status are protected from violence and assisted in re-building their lives.

PROVISION

Turning Policy into Delivery

- The new strategy to tackle Violence against Women in Wales, produced by the Assembly Government must include a clear strategy, and an operational action plan that includes clearly stated and measurable outcomes.
- The strategy must take into account both short term and long term policy and delivery: dealing with victim support and perpetrator sanctions but also seeking to reduce and ultimately end violence against women.
- The comprehensive strategy and action plan must include all forms of Violence against Women – domestic abuse, trafficking, FGM, forced marriage and honour-based crimes, sexual violence, abuse and exploitation, stalking and harassment. New research and deliverable action plans must be a real priority.
- A specific focus should be drawn up to enable action for women who may have mental health issues, disabled women who suffer violence, women who have substance misuse, and women who present multiple inequalities.

An Integrated Strategy

- All Welsh Assembly Government departments have a role to play in the strategy to tackle Violence against Women in Wales. Specific actions for every department have been clearly identified in the table in section 8.3.
- The strategy should be overseen by one Assembly Government Minister, but all departments within the Assembly Government must be included in development and delivery. A minister who has the role of championing this agenda within the Cabinet is important, but also vital is a senior official with executive responsibility across multiple departments to drive through change.
- Strong partnership links should be built with those UK Government departments operating in Wales and joint action must be included in the measurable outcomes of the new strategy.

Investment in Change

- In order to deliver cross-government funding it is necessary to ring-fence this budget and make it entirely clear how it can be spent across departments.
- A review of frontline funding is required to ensure that the funding reflects the different needs of victims of violence rather than different policy programmes; that it is flexible, is not short term and is not based on geographic location.

Scrutiny and Evaluation

- Progress against the new strategy and action plan should be evaluated and published on an annual basis.
- Consideration should be given to identifying an external specialist to benchmark and evaluate delivery.

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