

NSPCC Cymru/Wales

Response to:

**Strategic Action Plan to address violence against
women and to update the Welsh Assembly
Government's Domestic Abuse Strategy**

September 2009

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About us:

The National Society for the Prevention of Cruelty to Children (NSPCC) is the UK's leading charity specialising in child protection and the prevention of cruelty to children. The NSPCC's purpose is to end cruelty to children. We seek to achieve cultural, social and political change - influencing legislation, policy, practice, attitudes and behaviours for the benefit of children and young people. This is achieved through a combination of service provision, lobbying, campaigning and public education.

The NSPCC exists to end cruelty to children through a range of activities designed:

- to help children who have suffered abuse overcome the effects of such harm;
- to prevent children from suffering abuse;
- to prevent children from suffering significant harm as a result of ill-treatment;
- to help children who are at risk of such harm; and
- to work to protect children from further harm.

The NSPCC has more than 180 teams and projects throughout Wales, England and Northern Ireland. Their work includes:

- family support, assessment, counselling and therapy to children and families experiencing abuse;
- investigations into allegations of child abuse; and
- work within schools and other youth organisations to provide a voice for children and advocate their rights.

Since February 2006 NSPCC has also delivered the ChildLine service, the UK's free, 24-hour, confidential helpline for children and young people.

Introduction

NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation on violence against women and the Welsh Assembly Government's Domestic Abuse Strategy. When *Tackling Domestic Abuse: The All Wales National Strategy* was published in March 2005 NSPCC Cymru/Wales welcomed the strategy and particularly its recognition of children and young people as victims of domestic abuse and that domestic abuse was a child protection issue. This acknowledgment has certainly helped to raise the profile of the impact that domestic abuse has on children and young people and we recognise the role that the Welsh Assembly Government played in driving this agenda forward. We also recognise the increased budget for domestic abuse within the Welsh Assembly Government and the funding for a variety of important services and initiatives.

Whilst the original strategy was widely viewed as being full of good sentiment and sound thinking it did become apparent that the lack of a strategic action plan, outlining how the strategy was to be implemented, was a block to effective delivery of the strategy. The publication of this action plan for consultation is therefore to be welcomed and should aid in ensuring that the domestic abuse agenda is delivered in a more uniform fashion across Wales.

NSPCC Cymru/Wales spent considerable time gathering evidence to provide both written and oral evidence to the Assembly's Communities and Culture Committee's inquiry into domestic abuse in Wales. Further to providing this evidence we also facilitated a visit by committee members to our domestic abuse service based in Wrexham (now based in Prestatyn), which covers North Wales. We were pleased that many of the issues and challenges we raised with the committee were reflected in the final report and the recommendations.

In December 2008 we launched a campaign to encourage governments across the UK to see domestic abuse from a child's point of view. The three main calls for this campaign being:

- More support services for children and families experiencing domestic abuse;
- Training for professionals to identify children living with domestic abuse;
- Education about domestic abuse in schools and other youth settings.

A briefing on this campaign can be downloaded via:

http://www.nspcc.org.uk/Inform/policyandpublicaffairs/Wales/briefings/DomesticAbuseBriefing_wdf63544.pdf

In this response we intend to look at each section and the action points relevant to children and young people within them. We will also aim to highlight areas where we feel actions have been missed or where we feel the recommendations made by the Communities and Culture Committee have not been taken on board.

1. Prevention, Raising Awareness and Protecting Children

As stated above we welcome the focus that *Tackling Domestic Abuse: The All Wales National Strategy* provided on recognising children and young people as victims of domestic abuse. Unfortunately we believe that this increased recognition has not yet been matched with improved service provision locally for this group of children and young people.

Guidance for local commissioners and planners

NSPCC Cymru/Wales believes that clearer guidance needs to be provided to those commissioning and developing services locally to ensure that the needs of children and young people experiencing domestic abuse are met. Whilst we recognise that many of the draft local Children and Young People's Plans highlight the impact of domestic abuse on children and young people as an issue, in certain plans this is not followed up with a clear indication of what will be commissioned and delivered locally.

The Assembly's Communities and Culture Committee's report *Domestic abuse in Wales*¹ recognised the need for guidance to commissioners in recommendation six, which states:

¹ *Domestic Abuse in Wales*, Communities and Culture Committee, National Assembly for Wales, December 2008, http://www.assemblywales.org/cc3_domestic_abuse_inquiry_report_-_e_-_final.pdf

The Welsh Assembly Government should produce guidance directed at commissioning authorities, identifying the range and standards of services which should be provided to meet the needs of people affected by domestic abuse at an early intervention stage, at crisis point, and following crisis intervention....²

Whilst the Welsh Assembly Government accepted this recommendation in their response, we do not believe that this is reflected in the action plan.

In 2004 the Scottish Executive published *Children and young people experiencing domestic abuse: Guidance note for planners*³, which was guidance to inform those commissioning services how to incorporate the needs of children and young people into local planning processes. The guidance was developed in response to the perceived need to improve the level, spread, quality and funding of domestic abuse services to children and young people in Scotland. Whilst there are some differences between the situation in Scotland and Wales, we believe that we are in a similar situation in terms of the lack of strategic direction for the funding and commissioning of domestic abuse services to children and young people. The Scottish guidance makes a clear link to the Scottish Executive's expectations and aspirations for all children and young people in Scotland and also contains good practice examples and action points.

In May 2006 the Local Government Association, Cafcass and Women's Aid produced in England *Vision for services for children and young people affected by domestic abuse*⁴. As with the Scottish guidance this sought to provide local commissioners and partnerships with a template for working together to ensure that the needs of children and young people who experience domestic abuse are met in local planning. This guidance is more detailed than the Scottish guidance and includes four tiers of need, which are outlined as:

- Tier 1: Universal services (i.e. in schools)
- Tier 2: Service providing positive support for vulnerable children, mostly single service, though some services at this level are themselves multi-agency, e.g. Sure Start
- Tier 3: Multi-agency response – support, assessment and provision of specialist services
- Tier 4: Multi-agency risk assessment⁵

The guidance also contains five standards that outline the range of services and interventions that need to be available to improve outcomes. The standards are:

- Standard 1: Protection and safety
- Standard 2: Services to promote wellbeing, achievement and self esteem
- Standard 3: Early identification, assessment and information sharing
- Standard 4: Prevention and education
- Standard 5: Co-ordination and planning⁶

The guidance also asks for examples of how the proposed framework has been applied and for best practice models.

Both of these sets of guidance provide local commissioners and planners with a clear template for considering and meeting the needs of children and young people who experience domestic abuse.

In Wales the local planning responsibility for children and young people who experience domestic abuse appears to sit with the local Children and Young People's Partnerships, but where do the Local Safeguarding Children Board (LSCB) and the Community Safety Partnership, which has overall responsibility for domestic abuse, fit into this process? We are concerned that this lack of clarity could lead to children and young people experiencing domestic abuse falling between partnerships and their needs not being met.

² Ibid p.51

³ *Children and young people experiencing domestic abuse: Guidance note for planners*, Scottish Executive 2004, <http://www.scotland.gov.uk/Publications/2004/10/20122/45520>

⁴ *Vision for services for children and young people affected by domestic abuse*, Local Government Association, 2006, <http://www.lga.gov.uk/lga/aio/1224298>

⁵ Ibid p.8

⁶ Ibid p.13

Some work has been undertaken to clarify the roles of different local partnerships in relation to children and young people during the first year review of LSCB's conducted by the Welsh Assembly Government⁷. This report concluded that whilst LSCB's should take overall responsibility for all safeguarding issues relating to children and young people, other partnerships had responsibility for specific groups. The section on *Safeguarding – Definition and Responsibilities* concludes that children and young people experiencing domestic abuse should be the responsibility of Community Safety Partnerships, who would then report annually on delivery to the local LSCB. Whilst this report primarily focuses on LSCB's, it is important that the recommendations are taken on board and relevant guidance amended for other local partnerships. It is also important to note that LSCB's have no role in directly commissioning or funding services for children and young people locally.

The lack of clarity locally also has the potential to impact on what funding streams should be used for supporting work with children and young people. This action plan identifies Flying Start and Cymorth, and we highlight issues relating to these programmes later in this response, but in reality those providing services to children and young people access their funding from a variety of sources. If no one partnership is taking responsibility for this group of children and young people and for ensuring all local partnerships are working together, then the concept of pooled funding to commission services simply will not happen.

We believe that the type of guidance produced in Scotland and particularly the guidance in England would help clarify the roles of partnerships and help set minimum standards for the provision of services to children and young people locally. The guidance could also help to encourage local partnerships to work together and pool funding across local government boundaries to jointly commission and deliver services, as envisaged by the Beecham Review. Whilst the production of such guidance will not produce more resources it may help to ensure that resources are being effectively utilised to improve outcomes for children and young people locally.

NSPCC Cymru/Wales recommends that an action/target is added to this action plan for the Welsh Assembly Government with relevant partner agencies, including the Welsh Local Government Association and representatives from the voluntary sector, to develop guidance for local commissioners and planners on meeting the needs of children and young people who have experienced domestic abuse. This guidance should take into account those documents already produced in Scotland and England as a basis for this development. This would ensure that recommendation six of the Assembly's Communities and Culture Committee report was met.

Forced Marriage

NSPCC Cymru/Wales welcomes the recognition of the issue of forced marriage within this guidance and also the steps taken by the Welsh Assembly Government to co-ordinate activity in this area through the establishment of a specific task group. In June 2008 NSPCC published "*I can't tell people what is happening at home*": *Domestic abuse within South Asian communities: the specific needs of women, children and young people*⁸, which looked at the experiences of South Asian women and children in England and Wales. Within the report a specific chapter is dedicated to the issue of forced marriage, which highlights some of the barriers to victims of forced marriage making themselves known to services that may be able to help them. The report found across England and Wales varied levels of understanding and practice in relation to forced marriage, which poses a significant barrier to supporting victims. In particular the report recommends and highlights the importance of training for frontline professionals to increase their understanding and enable them to identify vulnerable young people.

We acknowledge that training for professionals is included in action point 5.10, but it is also crucial that this is not a one off session but is ongoing. Without ongoing training for professionals the publication of guidance will not lead to implementation and improved outcomes. We have experienced this with child trafficking where despite guidance being

⁷ *Local Safeguarding Children Boards Wales: Review of regulations and guidance*, Welsh Assembly Government, March 2008,

<http://new.wales.gov.uk/dhss/publications/children/guidance/boardsreport/reporte.doc?lang=en>

⁸ "*I can't tell people what is happening at home*": *Domestic abuse within South Asian communities: the specific needs of women, children and young people*, NSPCC, June 2008,

http://www.nspcc.org.uk/Inform/research/Findings/ICantTell_wda57838.html

published by the Welsh Assembly Government we still have evidence of practitioners either not being aware of it or not feeling confident enough to apply the guidance.

NSPCC Cymru/Wales recommends that the action point relating to training includes recognition that this needs to be ongoing and that an explicit link is made between the action point relating to the publication of the Forced Marriage Guidance in June 2009, further emphasising the importance of ensuring that frontline practitioners are equipped with the skills and understanding to implement the guidance.

At present the actions relating to forced marriage are located throughout the document, which makes the Welsh Assembly Government's response to this area feel disjointed.

NSPCC Cymru/Wales recommends that the action points relating to forced marriage are located together to provide agencies with more of a joined up approach to implemented this area of the action plan

Integrated Family Support Teams

NSPCC Cymru/Wales welcomes the proposal to develop Integrated Family Support Teams (IFSTs) as outlined in the draft Children and Families (Wales) Measure. We responded to the consultation on IFSTs and also provided written evidence to the committee scrutiny of the measure⁹. We believe that there are a couple of crucial issues that we raised during that consultation that we would like to take this opportunity to reiterate.

In our initial responses we highlighted our concern that the duty to co-operate to establish these teams was not extended to the police in Wales, particularly in view of the teams working in domestic abuse situations. Frequently the police are a critical safeguard in domestic abuse situations and are often the first agency contacted about an incident. In order for the teams to be able to work safely with families it is crucial that the police are aware of the work and able to feed in any information they have. We have already seen the success of specially trained police officers working in domestic abuse situations and the significant value that they add. In these circumstances the police also act as a crucial safety net for any victims, as they would be able to report on incidents whilst the IFSTs are working with a family. We understand that the Welsh Assembly Government has acknowledged this point and has stated that they will look into this further.

NSPCC Cymru/Wales strongly recommends that section 49 of the draft Measure should be amended to include the police, this is in particular relation to the proposal to extend these teams into working with families where domestic abuse is an issue.

NSPCC Cymru/Wales welcomes and supports the Welsh Assembly Government's stated desire to ensure that the programmes and interventions that are delivered via the new teams are well evidenced and demonstrate positive outcomes for children and young people. The action plan indicates that the roll out of these teams to the area of domestic abuse will be in 2013-14 and during the interim period work will be undertaken to build workforce capacity. Alongside this we believe that it is crucial that some funding is also made available to ensure that there is a toolkit of evaluated programmes for work with children and young people that professionals will be able to access. In our response to the initial consultation we did highlight the need to ensure that funding is available to implement a rolling programme of evaluation, which would make sure that practitioners were able to access different programmes for working with families.

NSPCC Cymru/Wales would recommend that included under action 1.2 is recognition that funding needs to be made available to evaluate current programmes to ensure that these teams are able to have a toolkit of different interventions when they are phased in.

Whilst the development of IFST's is positive, we question what will happen in the intervening period to children and young people who experience domestic abuse. We are concerned at the availability of services, particularly for those not in refuges, and many of the local children and young people's plans recognise a lack of provision or a need to improve provision for this

⁹ Copies of our responses to these consultations can be downloaded via:
http://www.nspcc.org.uk/Inform/policyandpublicaffairs/Wales/Consultations/walesconsultationresponses_wda48594.html

group. Unfortunately not all of the plans go on to make concrete commitments to what will happen locally to meet this need. In our written evidence to the Communities and Culture Committee¹⁰ we recommended that before a revised strategy was published a mapping exercise of provision of services for children and young people who experience domestic abuse should be undertaken, which would help to highlight any gaps in provision. We are aware that a mapping exercise has been undertaken by the Welsh Assembly Government, but are unsure whether this relates to service provision for adults only or includes services to children and young people. This is particularly important as IFST interventions will concentrate on families at Tier 3, which according to the *Tiers of Need and Intervention* in the Welsh Assembly Government's ten year social services strategy¹¹, is 15% of the population and will be those with complex need. This means that children and young people who have managed to escape a domestic abuse situation, but are still in need of support and help would not necessarily meet the threshold or criteria for this type of intervention. We are concerned that the concentration on IFST as the solution will lead to these children and young people not having appropriate service provision

NSPCC Cymru/Wales strongly recommends that a mapping exercise is undertaken to look at what service provision is available to children and young people who experience domestic abuse, including where the provision is located, how it is funded, referral routes and nature of support provided. Following this a clear strategy should be developed, which includes the development of Integrated Family Support Teams, to provide support to all children and young people who experience domestic abuse.

Funding streams: Cymorth and Flying Start

NSPCC Cymru/Wales recognises and welcomes the commitment that the Welsh Assembly Government has demonstrated through the increasing in the annual budget for domestic abuse from £1.4 million in 2004 to £3.7 million in 2009, which has supported the development of this agenda throughout Wales. In saying this we are concerned at the identification of Cymorth and Flying Start as the two local funding streams for domestic abuse work with families, children and young people. The ring fenced Cymorth funding stream is due to be returned in three stages to the more general revenue support grant that local authorities receive, the next stage to begin in 2011. This means that in theory the "Cymorth" spend in future years could be utilised for any local activity. In our view this does not make this a stable funding stream for the ongoing development of domestic abuse services for children and young people. We would also be interested to find out what domestic abuse services are currently funded by this grant across Wales, and this is why we believe that funding should be included in the mapping exercise.

The primary function of Flying Start is to secure childcare and early parental support for children and families. As a funding stream it is only available in certain areas and concentrates on the 0-3 age range. In the guidance issued with Flying Start we cannot see any reference to its use to support domestic abuse services, which suggests that this is not an appropriate grant route. There is very little doubt that experiencing domestic abuse at an early age can leave a significant emotional mark on a child, but we do not believe that this funding stream has been designed to support domestic abuse services specifically. Similar to Cymorth at present Flying Start funding has been guaranteed only until 2011.

It is also interesting to note that both of these funding streams have very little interaction with Community Safety Partnerships, which appear to hold the lead for domestic abuse locally. This adds to the lack of co-ordination highlighted earlier between partnerships locally on this issue. Currently providers of services to children and young people who have experienced domestic abuse receive funding from a variety of sources and often local funding can be short term. It is absolutely crucial that there are sustainable, ongoing local funding streams for work with children and young people who experience domestic abuse. These funding stream should also recognise the different local partnerships involved and take into account the funding that is made available from Westminster as well, although most of this is directed towards criminal justice and support for adult victims.

¹⁰ Our evidence to the committee can be downloaded via:
http://www.nspcc.org.uk/Inform/policyandpublicaffairs/Wales/Consultations/walesconsultationresponses_wda48594.html

¹¹ *A strategy for social services in Wales over the next decade: Fulfilled lives, supportive communities*, Welsh Assembly Government, February 2007,
<http://new.wales.gov.uk/topics/health/publications/socialcare/strategies/fulfilledlives?lang=en>

In its current form we strongly believe that action point 1.3 is misleading and certainly incorrectly identifies Flying Start as a funding stream for domestic abuse services. As the future of these funding streams is uncertain to say the least, we do not believe that they form a sustainable basis for the future development of work with children and young people.

NSPCC Cymru/Wales strongly recommends that the Welsh Assembly Government reconsiders the appropriateness of the funding streams identified in action 1.3, particularly with regard to Flying Start. Further we recommend that the Welsh Assembly Government establish a dedicated funding stream to support the development of services and support for children and young people who experience domestic abuse and that this includes linking together local partnerships with responsibility for safeguarding, domestic abuse and commissioning of local services for children and young people.

Vulnerable Groups

NSPCC Cymru/Wales recognises the potential increased vulnerability of young people who are considered not in employment, education or training (NEET), but believes that equally there are other groups that should be considered. In particular we would like to take this opportunity to highlight some of the difficulties that teenagers face, both from experiencing adult domestic abuse in their lives as well as abuse they experience in their own relationships. In our evidence to the Committee we highlighted particularly our belief that this group of young people are often neglected and had specific needs. We recommended that any future strategy or action plan considers the needs of teenagers who have experienced domestic abuse. We are disappointed that this has not been reflected in this action plan.

In September 2009 NSPCC published *Partner exploitation and violence in teenage intimate relationships*¹². The research, funded by NSPCC and the Big Lottery Fund, was carried out by Bristol University and is the first study in the UK of teenage partner violence. The researchers asked young people aged 13-17 to complete a confidential survey and then undertook 91 in-depth interviews with young people from schools in Wales, Scotland and England. The findings of the report highlighted that young people, particularly girls, are experiencing partner violence and abuse at a much younger age than we had previously thought, some of which was quite severe. The research also highlighted the important link between experience of family violence or maltreatment and the increased likelihood of being in an abusive teenage relationship. This research also adds weight to the anecdotal evidence we have heard around more young women looking for support from agencies around issues of domestic abuse.

In our evidence to the committee inquiry we highlighted adolescents as a specific group that needed to be considered. Our services work with adolescents to help support them move on from the experience that they have had. The research that we recently published does highlight that, particularly for girls, experiences of maltreatment at home, including witnessing abuse, does make a young person more likely to be in an abusive relationship themselves. This is also reflected recommendation nine of the committee report which calls for particular attention to be made to ensure that:

*Provision is made for young women aged under 18 who are victims of domestic abuse from their own partner*¹³

In terms of adolescent boys who have been in domestic abuse situations, NSPCC Cymru/Wales domestic abuse services provide them with the opportunity to talk about their emotions and also work to ensure that they do not go on to replicate any abusive behaviours in their own relationships.

The research highlights that children and young people not only need information and support to recognise abusive relationships in adults in their lives, but that some may already be in abusive relationships. This is an area that has not particularly been addressed in domestic abuse policy across the UK. Those commissioning and delivering domestic abuse services, both in the voluntary and statutory sectors, should consider the needs of adolescent victims of

¹² *Partner exploitation and violence in teenage intimate relationships: Executive summary*, NSPCC, September 2009

http://www.nspcc.org.uk/Inform/research/Findings/partner_exploitation_and_violence_wda68092.html

¹³ p. 53, *Domestic Abuse in Wales*, Communities and Culture Committee, National Assembly for Wales, December 2008, http://www.assemblywales.org/cc3_domestic_abuse_inquiry_report_-_final.pdf

domestic abuse and develop support services to prevent any abusive or high risk behaviours being perpetuated.

NSPCC Cymru/Wales recommends that a new action is included that recognises that particular attention needs to be given to exploring what help and support is provided to adolescent victims of domestic abuse and that appropriate support services are commissioned and available for both teenage girls and boys.

Guidance for professionals working in youth and education settings

NSPCC Cymru/Wales welcomes the evaluation that the Welsh Assembly Government has funded into the use of certain materials to raise awareness of domestic abuse in schools. Education professionals play a key role in safeguarding children and young people, as the professionals that on a daily basis have the most contact with them. The new *Personal and social education framework for 7-19 year olds*¹⁴ contains reference to:

*The features of safe and potentially abusive relationships*¹⁵

The new framework in general provides a good overview of the type of issues and subjects that should be discussed with pupils. The initial guidance produced on domestic abuse for youth and educational settings was a positive attempt to ensure that professionals in these areas can approach this topic. We are unaware of how the guidance has been put into operation and whether professionals found it useful. It is important to note that the recent Welsh Assembly Government consultation document entitled *Thinking positively: Emotional health and well-being in schools and early years settings*¹⁶, which will be good practice guidance for all schools and early years settings in promoting emotional well-being, had no reference to domestic abuse or the good practice guide on domestic abuse. The link between witnessing domestic abuse and poor emotional and mental health is well established, so there is a need to ensure that these agenda's are linked up.

Any new guidance produced in this area should clearly link into and support both the delivery of the new PSE framework in schools and the promotion of positive emotional health and well-being. Rather than simply being another piece of guidance, it would then support the delivery of other core guidance within schools

NSPCC Cymru/Wales recommends that action point 1.7 ensures that any future best practice guidance links into the relevant guidance in education, particularly the new PSE framework and future guidance on emotional health and well-being. The new domestic abuse guidance should support the delivery of this topic in an education setting. The guidance should also make reference to s.175 of the Education Act 2002, which sets out the duty on education to safeguarding and promote the welfare of all children and young people.

The *National Service Framework for Children, Young People and Maternity Services*¹⁷ contains a specific action relating to providing children and young people with information about services that can protect them from harm:

2.55 *School children are informed of the availability, purpose and access routes to services that are in place to protect them from harm including ChildLine, the NSPCC Child Protection Helpline, social services, the Children's Commissioner for Wales and advocacy services*¹⁸

¹⁴ *Personal and social education framework for 7-19 year olds*, Welsh Assembly Government, January 2008, <http://new.wales.gov.uk/pesub/home/resources/documents/pseframework/?lang=en>

¹⁵ *Ibid* p.21a

¹⁶ *Thinking positively: Emotional health and well-being in schools and early years settings*, Welsh Assembly Government, March 2009, http://cymru.gov.uk/topics/educationandskills/policy_strategy_and_planning/schools/339214-wag/thinkingpositively/?jsessionid=QsJqKdpTGnJX6dvDqT4WfrFGGJGFM7yqwQk2nvb9h36kdk1zpKJ7!-1895006922?lang=en

¹⁷ *National Service Framework for Children, Young People and Maternity Services*, Welsh Assembly Government, February 2006, <http://www.wales.nhs.uk/sites3/Documents/441/EnglishNSF%5Famended%5Ffinal.pdf#>

¹⁸ *Ibid* p.22

It is vital that children and young people who are in domestic abuse situations are aware of services such as ChildLine that they can contact to talk about their experiences and also to seek help.

NSPCC Cymru/Wales recommends a new action is included to monitor and ensure the delivery of universal action 2.55, which would also ensure that information about services that can help protect children and young people is being provided in a co-ordinated way through schools across Wales. This should also be highlighted in any new guidance to youth and school settings.

The Communities and Culture committee made a specific recommendation in relation to teacher training, which we are disappointed that does not appear in the final action plan. Recommendation 15 includes the point that the Welsh Assembly Government should fund work to evaluate:

*The adequacy current arrangements for the training of teachers and other professionals working with children and young people, particularly in relation to the handling of domestic abuse*¹⁹

We have been concerned for some time over the amount of time given when training teachers to issues such as safeguarding and child protection. Further to these duties there is also the need to ensure that teachers are confident in discussing sensitive issues such as domestic abuse, as well as empowered to act on any concern that they may have. Initial and ongoing training is key to ensuring that professionals are able to discuss, identify and respond to domestic abuse situations. There may be a role here for the Community Safety Partnership to commission multi-agency domestic abuse training in conjunction with other local partnerships.

NSPCC Cymru/Wales recommends that an action point is included that the Welsh Assembly Government will ensure that education professionals are able to access appropriate training on issues such as domestic abuse and safeguarding both during initial teaching training and then throughout their careers. Local partnerships should work together to develop and deliver training opportunities across professional audiences.

Finally we would like to highlight the important role that peer relationships and peer support plays for children and young people experiencing domestic abuse. In the research on abuse in teenage relationships we highlighted earlier one of the main issues was that those young people experiencing abuse had not told any adult about their experience and stated that they were more likely to confide in a friend. Peer support plays a crucial role in encouraging children and young people to talk about their problems, but has traditionally been associated in education settings with support for those being bullied. This research suggests that education settings should think about whether a wider remit for peer support should be considered and appropriate training provided to peer supporters.

Developing peer support for vulnerable groups is also highlighted in the *National Service Framework for Children, Young People and Maternity Services*²⁰, where children and young people who experience domestic abuse are included in the chapter relating to children and young people in special circumstances:

6.2 *Peer-support groups for children in special circumstances are jointly funded and facilitated in each locality*²¹

NSPCC Cymru/Wales recommends that the Welsh Assembly Government examines whether peer support in schools could be extended, with appropriate training and support, to areas beyond bullying. This would have the potential of enabling children and young people experiencing domestic abuse to seek support from a peer in a safe environment, whilst also meeting an action with the children's NSF.

¹⁹ p.54-55, *Domestic Abuse in Wales*, Communities and Culture Committee, National Assembly for Wales, December 2008, http://www.assemblywales.org/cc3_domestic_abuse_inquiry_report_-_e_-_final.pdf

²⁰ *National Service Framework for Children, Young People and Maternity Services*, Welsh Assembly Government, February 2006, <http://www.wales.nhs.uk/sites3/Documents/441/EnglishNSF%5Famended%5Ffinal.pdf#>

²¹ *Ibid* p.59

United Nations Convention on the Rights of the Child (UNCRC)

NSPCC Cymru/Wales welcomes the recognition in the action plan of the need to explicitly reference the UNCRC in future publications relating to domestic abuse. Sadly children and young people continue to be one of the most vulnerable groups who do not have their rights protected via statute. We warmly welcome the statement made by the First Minister that the Welsh Assembly Government will be exploring how to put the principles of the UNCRC into legislation in Wales. Recognising that children and young people not only have a right to be safe from abuse and neglect under Article 19, but also that they have a right to access services to help them overcome any abusive situations under Article 39 is solid basis from which to build all policy relating to children and young people in domestic abuse situations.

In October 2008 the UN Committee on the Rights of the Child published their concluding observations on the report provided to them by the UK state party. The concluding observations contain a specific recommendation in relation to domestic abuse:

51 b) *ensure professionals working with children (including teachers, social workers, medical professionals, members of the police and the judiciary) receive training on their obligation to report and take appropriate action in suspected cases of domestic violence affecting children*²²

It is important that the commitment to the UNCRC is not only to set it as a basis for the policy framework around domestic abuse, but also to ensure that these rights are being realised on the ground for all children and young people. Delivering against all the concluding observations should form a key part of the Welsh Assembly Government's ongoing strategy for children and young people in Wales, including this particular recommendation.

NSPCC Cymru/Wales recommends that action 1.8 is amended and includes reference to working across the Welsh Assembly Government to ensure delivery against all the relevant recommendations made by the UN Committee and in terms of this action plan specifically those recommendations under section 51 relating to violence, abuse and neglect.

CAFCASS Cymru

In February 2009 NSPCC Cymru/Wales gave oral evidence to the Assembly's Health, Wellbeing and Local Government Committee as part of their inquiry into CAFCASS Cymru²³. In the paper we submitted before we gave oral evidence²⁴ we highlighted the role that CAFCASS Cymru could play in ensuring that children and young people, who experience some form of trauma, including domestic abuse, can access support services. The subsequent report by the committee²⁵ reflected these issues in two recommendations:

We recommend that CAFCASS ensures that it builds strong relationships with other partner agencies in order to support the need for increased multi-agency working in relation to families where domestic violence is an issue. [Recommendation 10]

*We recommend that the Welsh Ministers consider how a nationally co-ordinated range of direct support services for children and young people experiencing parental separation, familial conflict and domestic violence can be provided and the role that CAFCASS should play in directing children and young people toward these services. [Recommendation 17]*²⁶

²² p.12 *United Nations Committee on the Rights of the Child: Concluding Observations on UK*, October 2008, <http://www2.ohchr.org/english/bodies/crc/docs/AdvanceVersions/CRC.C.GBR.CO.4.pdf>

²³ A transcript of our evidence can be downloaded via: <http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third1/bus-committees-third-hwlg-home/bus-committees-third-hwlg-agens.htm?act=dis&id=117041&ds=2/2009>

²⁴ This paper can be downloaded via: <http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third1/bus-committees-third-hwlg-home/bus-committees-third-hwlg-agens.htm?act=dis&id=116645&ds=2/2009>

²⁵ *Inquiry into the Children and Family Court Advisory and Support Service (CAFCASS) Cymru*, Health, Wellbeing and Local Government Committee, National Assembly for Wales, July 2009, <http://www.assemblywales.org/cr-ld7632-e.pdf>

²⁶ *Ibid* pp.20-21

We welcome the steps that CAF/CASS Cymru have taken in developing their Domestic Abuse Resource Pack and hope that this will increase awareness of the issues facing both victims and children in domestic abuse situations. Further to these we believe that this action plan should take into account the Welsh Assembly Government's response to these recommendations to ensure that we can maximise the important role that CAF/CASS Cymru plays in identifying and supporting vulnerable children and young people.

NSPCC Cymru/Wales recommends that action 1.10 is amended to include reference to the Health, Wellbeing and Local Government Committee's report into CAF/CASS Cymru and a commitment to taking forward the relevant recommendations relating to domestic abuse.

Equal protection and parenting support services

NSPCC Cymru/Wales has welcomed the support provided by the Welsh Assembly Government to the Children Are Unbeatable/S'Dim Curo Plant campaign in Wales. We were particularly pleased that this support was reflected in *Tackling Domestic Abuse: The All Wales Strategy*, which stated that the Welsh Assembly Government would increase the safety of children and young people by:

*Encouraging policies that oppose the smacking of children and seeking to promote alternatives to physical discipline. The Assembly will be developing a Parenting Action Plan to take this agenda forward*²⁷

We are concerned that there are no actions or targets in this action plan that reflect the importance of encouraging non-violent discipline. We highlighted in our oral evidence to the Communities and Culture Committee in July 2008²⁸ how difficult it is to explain to children and young people that any violence between adults is wrong, when adults are legally allowed to hit children. It is important that this contradiction is addressed and in Wales we are fortunate to have the support of the Welsh Assembly Government in doing this.

We were disappointed that during the passage of the *The National Assembly for Wales (Legislative Competence) (Social Welfare and Other Fields) Order 2008*²⁹ that a ban on physical punishment in Wales was explicitly ruled out. As an outright ban is not currently possible it is essential that the Welsh Assembly Government continues to support positive parenting messages and to voice its opposition to the use of physical punishment as an appropriate form of discipline.

NSPCC Cymru/Wales recommends that a new action is included that continues the commitment of the Welsh Assembly Government to raise the issue of equal protection with Ministers at Westminster and also to seek to explore all avenues to reduce and end the use of physical punishment in Wales.

In our written evidence to the Communities and Culture Committee we also highlighted that the Welsh Assembly Government's *Parenting Action Plan*³⁰ included parents who experience domestic abuse in the section relating to support for specific groups of parents. The non-abusive parent has a crucial role to play in keeping any child or young person safe, but we know that experiencing domestic abuse can lead to adults struggling to undertake their parental duties and can compromise their parenting skills. Support for parents who have experienced domestic abuse must not only look to support them as victims, but should also support them to re-build their confidence in their parenting skills, so that they can protect their children. We believe that this is a neglected area of both domestic abuse work and parenting support.

²⁷ p.16, *Tackling Domestic Abuse: The All Wales National Strategy*, Welsh Assembly Government, March 2005, <http://new.wales.gov.uk/about/strategy/publications/socialjustice/935798/?lang=en>

²⁸ The transcript of our oral evidence can be downloaded via: <http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third1/bus-committees-third-ccc-home/bus-committees-third-ccc-agendas.htm?act=dis&id=92899&ds=7/2008>

²⁹ *The National Assembly for Wales (Legislative Competence) (Social Welfare and Other Fields) Order 2008*, http://www.opsi.gov.uk/si/si2008/uksi_20083132_en_1

³⁰ *Parenting Action Plan*, Welsh Assembly Government, December 2005, <http://new.wales.gov.uk/topics/educationandskills/publications/guidance/Parentingactionplansupporting?lang=en>

In May 2009 the Assembly's Children and Young People Committee published their report *Parenting in Wales and the delivery of the Parenting Action Plan*³¹. In response to this report³² Jane Hutt AM, Minister for Children, Education, Lifelong Learning and Skills, stated that the Welsh Assembly Government would be looking to develop a new Parenting Strategy for Wales. We believe that this development is an ideal opportunity to ensure that policy making in this area is joined up and that parents who have experienced domestic abuse receive the support that they need.

NSPCC Cymru/Wales strongly recommends that new actions are included in this section to address the issues of the use of physical punishment as well as parenting support for parents who have experienced domestic abuse, acknowledging that their experience may prevent them from effectively keeping their child safe. This should also read across to the development of a new Parenting Strategy by the Welsh Assembly Government.

2. Provide Support for Victims

Support services for children and young people

We have already expressed our concern at the lack of action in this document around support services for children and young people, a right for them under Article 39 of the UNCRC. NSPCC Cymru/Wales firmly believes that this section should contain reference to what the Welsh Assembly Government intends to put in place to support children and young people who experience domestic abuse and to properly reflect recommendation nine made in the Communities and Culture Committee's report. We appreciate that the previous section related to children and young people, but feel that this is focussed primarily on prevention rather than support after their experience. Integrated Family Support Teams are being developed with the view to earlier intervention with families where there are multiple problems, so may not necessarily provide the support to children and young people who have experienced domestic abuse, a point we raised earlier in relation to thresholds. In particular we would re-emphasise the recommendation we made in relation to the Welsh Assembly Government undertaking a mapping exercise, particularly if they have not do so already, to develop knowledge of what services are available for children and young people who experience domestic abuse, how a referral can be made and also how the services are funded.

The Welsh Assembly Government's response to the Communities and Culture Committee's report highlighted the development of school based counselling services as one of the responses to recommendation nine. We have warmly welcomed the decision of the Welsh Assembly Government to develop school-based counselling services in secondary schools as a significant step forward in helping to provide all children and young people with a further source of support. In saying this there is a need to ensure that this strategy is not seen as a solution to all issues facing children and young people. The school-based counsellors will undoubtedly support and help those who have experienced domestic abuse, but for the most part these will essentially act within Tier One of Child and Adolescent Mental Health Services (CAMHS). This means that their role will be primarily to identify children and young people in distress, provide some support and then look to refer on if the child or young person needs more intensive support. Our concern is that there is a lack of services for the counsellors or other professionals to refer to. It is important that there is clarity around the responsibility of different professionals and we are concerned that school-based counselling will be expected to deliver a service to children and young people who have experienced domestic abuse that some professionals will not be qualified to deliver.

We welcome the extra funding that has been put in place to help support children's workers within refuge provision, but it has to be realised that not every child or young person will enter refuge and they may not stay there for a long enough period of time for effective work to be undertaken. There needs to be accessible service provision within the wider community to help support these children and young people to overcome their experiences. Tragically we are aware of how witnessing domestic abuse can emotionally damage a child or young

³¹ *Parenting in Wales and the delivery of the Parenting Action Plan*, Children and Young People Committee, National Assembly for Wales, May 2009, <http://www.assemblywales.org/bus-home/bus-guide-docs-pub/bus-business-documents/bus-business-documents-doc-laid.htm?act=dis&id=129832&ds=5/2009>

³² The response can be downloaded via: http://www.assemblywales.org/wag_response_e.pdf

person into adulthood, so these services are needed to ensure that they have someone to talk to about their experiences.

Once again the *National Service Framework for Children, Young People and Maternity Services*³³ contains a clear action in relation to services for children and young people who experience domestic abuse within the children in special circumstances section, which is:

6.3 *Organisations provide inclusive services and additional **targeted services**, for all children in special circumstances and their families. Take up of service provision is regularly monitored and service planning revised accordingly to ensure equitable access*³⁴

This section also applies to children and young people in refuge accommodation. We strongly believe that this action plan should be looking to the children's NSF and including the relevant actions to encourage delivery locally.

NSPCC Cymru/Wales strongly recommends that this section in relation to providing support for victims should not only commit the Welsh Assembly Government to mapping and developing support services in Wales for children and young people who experience domestic abuse, but should also cross reference with the *National Service Framework for Children, Young People and Maternity Services* and include the relevant actions to encourage the development of these services locally.

The Welsh Assembly Government should also look at how it can engage with children and young people who have experienced domestic abuse to see what type of support they feel most benefits them. We welcome the genuine desire from the Welsh Assembly Government to seek to involve children and young people in this consultation process and it was disappointing that due to the timing of the process we were unable to facilitate this. We believe, though, that it is worth noting the work that has been undertaken in Scotland, funded by the Scottish Executive and carried out by the Centre for Learning in Child Protection at Edinburgh University and Scottish Women's Aid, looking generally at the experience of Scottish children and young people of domestic abuse and specifically at their feelings on moving from home to refuge. These two reports can be downloaded via:

<http://www.clicp.ed.ac.uk/publications/reports.html>

NSPCC Cymru/Wales would recommend that at some point over the life of this action plan the Welsh Assembly Government identifies some funding to commission research into the views of children and young people who have experienced domestic abuse and the type of support services that they believe help them most.

Child Trafficking

NSPCC Cymru/Wales welcomes the inclusion of trafficking in this action plan, although we believe it needs to be clearer whether this forms a part of the domestic abuse action plan or the wider violence against women agenda. We also welcome the reference to the Welsh Assembly Government guidance on child trafficking. We are concerned though at the focus here on women and girls and the trafficking for the purposes of sexual exploitation, which may not link with the wider need to raise awareness around child trafficking. In June 2009 NSPCC and the University of Bedfordshire published the report *Breaking the wall of silence: Practitioners' responses to trafficked children and young people*³⁵, which explored professional attitudes to children and young people who had been trafficked and analysed a number of cases. The report highlights the issue of assumptions being made by practitioners:

Different forms of trafficking can be hidden under the dominant image of a girl or young woman trafficked for sexual exploitation....Practitioners expressed concerns that this may overshadow awareness of trafficking for other forms of exploitation, including benefit

³³ *National Service Framework for Children, Young People and Maternity Services*, Welsh Assembly Government, February 2006,

<http://www.wales.nhs.uk/sites3/Documents/441/EnglishNSF%5Famended%5Ffinal.pdf#>

³⁴ *Ibid* p.60

³⁵ *Breaking the wall of silence: Practitioners' responses to trafficked children and young people (Executive summary)*, NSPCC, June 2009,

http://www.nspcc.org.uk/Inform/research/Findings/breaking_the_wall_of_silence_wda65628.html

*fraud, forced marriage, domestic servitude, work in cannabis factories and nail parlours, as well as masking trafficking of boys and young men.*³⁶

The research goes on to highlight a number of key issues around the trafficking of children including the need for accessible services to help trafficked children to overcome their experiences, robust protocols to be in place across agencies, and training for professionals (including foster carers and interpreters).

The report *Bordering on Concerns*³⁷ written by End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes (ECPAT UK) for the Children Commissioner for Wales, and other reports have highlighted that child trafficking is happening in Wales. One of the issues that is common in both our report and the ECPAT UK/Children's Commissioner report is the lack of practitioner awareness around what constitutes child trafficking. There is a need for a co-ordinated strategy to raise awareness across professional boundaries to ensure that there is a robust and suitable response to cases where trafficking has been suspected. We are concerned that the focus here on sexual exploitation and solely young girls, may reinforce unhelpful stereotypes. It may also lead to a failure to join up initiatives across the Welsh Assembly Government to combat the issue of child trafficking.

NSPCC Cymru/Wales strongly recommends that further discussions are had across the Welsh Assembly Government departments to agree to the development of a joined up child trafficking strategy, which seeks to ensure practitioners training needs are met, they are aware of the relevant guidance and that trafficked children and young people can access support services.

3. Improving the Response of Criminal Justice Agencies

NSPCC Cymru/Wales recognises the steps that the police in particular have taken to increase the profile of domestic abuse incidents and also to recognise children and young people as victims. In the coming weeks NSPCC will be publishing research undertaken by researchers from the University of Central Lancashire entitled *Children and Families Experiencing Domestic Violence: Police and Children's Services' Responses*³⁸, which spoke to victims and perpetrators of domestic abuse, children and young people and key agencies to examine the way in which domestic abuse incidents are handled. One of the findings from the research was that children and young people felt that they were ignored or excluded by the police, who mostly spoke to the adults involved. The children and young people we spoke to wanted more information about what would happen next. Interestingly half of the officers we interviewed for the research expressed some reluctance in engaging directly with children. We would be happy to provide a copy of this research once it has been published and to discuss how our approach in Wales can learn from the recommendations.

4. Improving the Response of Health Services and Other Agencies

Training for professionals

NSPCC Cymru/Wales is surprised that there is no specific action point relating to ensuring that appropriate training is available across professions on identifying and supporting adult victims, children and young people in domestic abuse situations. The majority of the actions within this section relate to health professionals, which is understandable as they are often at the forefront of dealing with any injuries caused by domestic abuse. It is critically important that all professionals are able to access appropriate and ongoing training on domestic abuse, as we know that those experiencing these situations can often be scared to seek help from professionals. In these situations identification of an abusive situation by a professional can be of key importance. Training can also help remove any preconceptions that professionals have about who are victims of domestic abuse and the reasons why it can be difficult to leave an abusive relationship.

As we highlighted earlier the UN Committee on the Rights of the Child made a specific recommendation in its report in 2008 in relation to training for frontline professionals on

³⁶ Ibid p.6

³⁷ *Bordering on Concern: Child trafficking in Wales*, Children's Commissioner for Wales & ECPAT, March 2009, <http://www.childcomwales.org.uk/uploads/publications/130.pdf>

³⁸ This research will be available via www.nspcc.org.uk/inform

appropriate responses to children and young people experiencing domestic abuse. This training needs to start during initial professional training and then continue throughout a professional's career, to ensure that they are aware of new developments and interventions.

NSPCC Cymru/Wales recommends a new action is placed within this section committing the Welsh Assembly Government to review the training on domestic abuse, particularly the impact on children and young people, that key professionals in health, education, police and social care are able to access. This should include looking at the attention paid to domestic abuse in initial training, what ongoing training is available and how multi-agency training is commissioned locally.

Sexual Assault Referral Centres (SARCs)

NSPCC Cymru/Wales notes the recent positive developments to not only look at SARCs as support services for adult victims, but increasingly to look at how children can be supported through this development. Whilst these developments have some way to go, we welcome the acknowledgment that children and young people need slightly different support. The Welsh Assembly Government's strategy for Child and Adolescent Mental Health Services (CAMHS), *Everybody's Business*³⁹ identifies children and young people who have experienced abuse as a particular focus for service development.

In July 2009 NSPCC published *Sexual abuse and therapeutic services for children and young people: The gap between provision and need*⁴⁰, which sought to map the provision of therapeutic services across the UK for children and young people who had experienced sexual abuse. The mapping of services in Wales proved tricky due to the difficulty in accessing any information about what services were being commissioned and delivered within Wales. The report managed to identify fifteen services spread out across Wales that would provide therapeutic support to children and young people who experienced sexual abuse. These findings, particularly the lack of transparency in being able to access the information, are deeply concerning, with some areas of Wales having hardly any provision at all. In light of this the developments relating to SARCs in Wales are even more critical if they can help to encourage the development of support services for children and young people who experience sexual abuse.

More broadly we are aware that the Welsh Audit Office (WAO) and Healthcare Inspectorate Wales (HIW) are due to publish a report in the coming months on the state of CAMHS in Wales. We have provided extensive evidence to this review, expressing our concern at the lack of provision, the variable and often high thresholds and the lack of transparency in the commissioning process. We believe that this report should mark the beginning of the Welsh Assembly Government addressing the situation of mental health services for children and young people in Wales, something which we believe is overdue.

Despite the positive words of the Welsh Assembly Government's CAMHS strategy we do not believe that there are enough support services across Wales for children and young people who experience sexual abuse or domestic abuse. This action plan needs to acknowledge that alongside the development of SARCs to support adult victims, there are also the needs of children and young people, who currently have limited service provision.

NSPCC Cymru/Wales strongly recommends that action 4.4 is amended to include reference to the Welsh Assembly Government monitoring the development of support for children and young people who have experienced sexual abuse, which includes ensuring sustainable funding streams for this work.

NSPCC Cymru/Wales recommends that this action plan notes the impending publication of the WAO/HIW report on CAMHS in Wales and that an action point is included committing the Welsh Assembly Government to ensuring that any recommendations are acted upon to ensure that children and young people who experience abuse are able to access appropriate, timely, child centred services.

³⁹ *Child and Adolescent Mental Health Services: Everybody's Business*, September 2001, <http://new.wales.gov.uk/topics/health/publications/health/strategies/childadolescentmentalhealth?lang=en>

⁴⁰ *Sexual abuse and therapeutic services for children and young people: The gap between provision and need*, NSPCC, July 2009, http://www.nspcc.org.uk/Inform/research/Findings/sexual_abuse_therapeutic_services_wda67007.html

5. Supporting and Monitoring Delivery of the Strategy Including Performance Framework and Evaluation

NSPCC Cymru/Wales welcomes the approach of the Welsh Assembly Government to ensuring that programmes are evaluated and show positive outcomes, including the funding made available to pilot and externally evaluate the Caring Dads programme.

Domestic abuse co-ordinators

NSPCC Cymru/Wales welcomes the actions in relation to evaluating the role of domestic abuse co-ordinators and the development of key performance standards for these roles. We welcomed the funding to ensure that every local authority was able to appoint a domestic abuse co-ordinator and our interaction with these roles have been very positive. NSPCC Cymru/Wales believes that alongside evaluating the role of the co-ordinator, the role of the domestic abuse forum should be looked at or even included in the evaluation. Across Wales these forums have been invaluable in bringing together the key agencies to look at issues relating to domestic abuse in the locality and across Wales. In saying this, though, we believe that where they sit in terms of other local partnerships and their relationship across these partnerships should be examined. This is particularly the case as domestic abuse is an issue that cuts across so many of the responsibilities of the local partnerships.

NSPCC Cymru/Wales recommends that an action point is added or action 5.7 is amended to look at how domestic abuse forums are operating across Wales and to ensure that they are appropriately linked in to other local partnerships.

Conclusion

Once again NSPCC Cymru/Wales welcomes the positive steps that the Welsh Assembly Government has taken to recognise that impact of domestic abuse on children and young people. We believe that this action plan should move on from ensuring professionals are aware of this impact to ensuring that children and young people receive the information and support they need to keep themselves safe. We would be happy to discuss any aspect of this response with officials and look forward to continuing to work with the Welsh Assembly Government and other partner agencies to ensure all children and young people in Wales are safeguarded.

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