



**Response to:  
A consultation on draft statutory guidance on the  
National Training Framework on violence against  
women, domestic abuse and sexual violence under  
section 15 of the Violence Against Women, Domestic  
Abuse and Sexual Violence Act Wales (2015)**

**Date: October 2015**

NSPCC Cymru/Wales,  
Diane Englehardt House,  
Treglown Court,  
Dowlais Road,  
Cardiff CF24 5LQ

Tel: 020 3188 3616 Email: [publicaffairs.cymru@nspcc.org.uk](mailto:publicaffairs.cymru@nspcc.org.uk)

**MAE POB PLENTYNDOD WERTH BRWYDRO DROS  
EVERY CHILDHOOD IS WORTH FIGHTING FOR**

## About the NSPCC

We're leading the fight against child abuse in the UK and Channel Islands. We help children who've been abused to rebuild their lives, we protect children at risk, and we find the best ways of preventing child abuse from ever happening.

Abuse ruins childhood, but it can be prevented. That's why we're here. That's what drives all our work, and that's why – as long as there's abuse – we will fight for every childhood.

We help children rebuild their lives, and we find ways to prevent abuse from ruining any more. So when a child needs a helping hand, we'll be there. When parents are finding it tough, we'll help. When laws need to change, or governments need to do more, we won't give up until things improve. Abuse changes childhood. But so can we.

## Overview

NSPCC Cymru/Wales welcomes the opportunity to comment on proposals for a National Training Framework (henceforth referred to as the NTF) on gender-based violence, domestic abuse and sexual violence. We are very supportive of Welsh Government proposals to develop the NTF to foster a more consistent and coherent approach to training for public sector professionals in these areas. We believe that this approach has the potential to have a significant impact on the lives and experiences of victims of Wales. We congratulate Welsh Government on being the first administration in the UK to commit to a holistic approach to training across the public service on these issues. We also are aware that the development of the NTF is a complex and ambitious project and our response to this consultation is intended to make a series of suggestions to help ensure the NTF can be as effective as possible. NSPCC Cymru/Wales will be pleased to continue to support the delivery and content development of each level of the NTF through our membership of the Content Delivery Group.

NSPCC Cymru/Wales draws on our experience of delivering services which are innovative, distinctive and designed to capture and disseminate learning to inform our response to this consultation on the NTF. Our response to the multi-layered and intertwined nature of neglect and abuse has been the development of a suite of cutting edge new services, many of which are offered across our three service centres in Wales. Our service centres are designed to be places where children can feel safe and supported and better able to overcome the trauma they have experienced and our evaluation of the services we provide help us to understand the range of issues and any challenges in the prevention, protection and treatment of abuse.

As part of our suite of services on offer across Wales, NSPCC Cymru/Wales has operated and evaluated two services; Domestic Abuse Recovering Together (DART) and Caring Dads: Safer Children (CDSC) specifically to support children and families who are affected by domestic abuse. We welcomed the opportunity to present evaluation findings from these programmes to Welsh Government officials in September 2016.

We would also draw attention to our Letting the Future in programme which works with boys and girls aged 14-17 to help them recover from sexual abuse. This programme is run from our Cardiff, Prestatyn and Swansea Service centres. In Wales we will also shortly be delivering a new service 'Protect and Respect' which offers preventative and protective initiatives to young people who have been sexually exploited or who are vulnerable to this sort of abuse, this may also be relevant to the consideration of appropriate services under the GBV, DA, SV Bill.

The NSPCC has recently launched our Impact and Evidence hub <http://www.nspcc.org.uk/services-and-resources/impact-evidence-evaluation-child-protection/> which hosts all of the evaluations of the effectiveness of our range of programmes and is designed to share our knowledge about what works so that together we can help many more children.

Our comments on the National Training Framework have been informed by a series of conversations over a period of 3 months with Service Centre Managers

and Children's Services Practitioners in our Prestatyn and Cardiff Service Centres. We have also conducted in-depth interviews with two Service Users, one a father, who took part in our Caring Dads: Safer Children (CD:SC) programme and one a mother, a survivor of domestic abuse, who has received a range of direct support and advice for her children from NSPCC services. We also facilitated a service user session with Caring Dads practitioners in Cardiff and we are pleased to see some of the comments of service users made during this session reflected in the draft Guidance. We would endorse this direct involvement of service users continuing and would be pleased to help facilitate wherever possible.

**1. Do you agree with the proposal for relevant authorities to outline how they will meet the requirements of the National Training Framework within a training plan?**

YES

NSPCC Cymru/Wales has previously commented that the United Convention on the Rights of the Child should be considered carefully in the development of the NTF. We have been pleased to receive assurances that a Children's Rights Impact Assessment has been completed on this Guidance and we would recommend that this should be made public alongside the final Guidance.

As Welsh Government is aware UNCRC includes a series of Articles which emphasise the role of Governments in ensuring children's rights in contexts of violence and abuse are upheld and the state's responsibility to support parents to protect their children:

**Article 19** – Governments should ensure that children are properly cared for, and protect them from violence abuse and neglect from their parents or anyone else who looks after them.

**Article 34-** The Government should protect children from sexual abuse.

**Article 48** – Children who have been neglected or abused should receive special help to restore their self-respect.

We note that the draft Guidance as it stands does not make any reference to the UNCRC and we would recommend that relevant authorities should take this into consideration and use it as a framework when developing joint local training plans and local training needs analyses. **We therefore believe that reference to the UNCRC should be included in the Guidance.** We would also suggest that in accordance with the due regard duty on Welsh Ministers under the Rights of Children and Young Person's (Wales) Measure, when reviewing the local training plans submitted by 31<sup>st</sup> August 2016, Welsh Ministers should ensure that plans have taken adequately taken the UNCRC into consideration.

We would also recommend that the guidance provides more information for relevant authorities about how local training needs analyses should work alongside local needs assessments that will be required by the Social Services and Wellbeing (Wales) Act 2014.

Moreover, the Social Services and Well-being (Wales) Act 2014 makes wide-ranging reforms, and it has been recognised that there are major implications for the learning and development needs of the sector workforce. In advance of the Act coming into effect in April 2016, the Care Council is developing a national learning and development plan to support its implementation. NSPCC Cymru/Wales has been asked to sit on the Care Council Training development group. Evidently there is significant scope for the NTF and the Care Council work to be complementary especially given similar timescales. We would suggest that the guidance should make the links and differences clearer to relevant authorities/professionals concerned.

## **2. Which existing structures, boards or partnerships could best provide the strategic infrastructure for such work?**

We would suggest that thought is given to how the NTF aligns with the new Public Service Boards to be developed under the Well-being of Future Generations (Wales) Act 2015 and the new regional Safeguarding Children and Adult Boards that have been established under the Social Services and Well-being (Wales) Act 2014.

A general point is that it is also very important that the NTF recognises what we know about the very close links of domestic abuse to neglect, physical & emotional abuse in children, mental health and drug and alcohol use. Concerns were expressed by our Practitioners that when applying to children the issues covered by the Bill – Gender-based Violence, Domestic Abuse and Sexual Violence, do not sit together as comfortably as may be assumed. Therefore, we believe that while the wider population and workforce will need training which could be limited to the key issues set out in the Bill, the practitioner and frontline workforce who will be dealing with the areas covered by the Bill on a day-to-day basis will need access to a suite of integrated training which adequately reflects the links and cross-over to all these other issues. We would suggest that addressing this will need to be considered if professionals are to develop a greater understanding of the complexities of the subjects and an appreciation of how these situations play out for children and a necessary level of understanding of the co-occurrence of issues.

We note the session of the Guidance which highlights 'Alignment to other frameworks and learning models' but we would highlight that there are some significant omissions in this section. The Keeping Learners Safe Guidance recently issued by Welsh Government to schools seems to be an important relevant document that should be signposted. We would also suggest that the All Wales Child Protection Procedures and the Safeguarding Children: Working Together under the Children Act 2004 should be clearly signposted. We are aware that Safeguarding Children: Working Together under the Children Act 2004 is currently being updated and this should be considered in terms of how it is referenced in the final Guidance.

We also believe that it is very important to include the NICE Guidelines on commissioning of integrated care pathways in health and social care to emphasise the importance that *'all service pathways have consistent, robust mechanisms for assessing the risks facing adults who experience domestic violence and abuse and any children who may be affected. This includes*

*ensuring those affected by, and the perpetrators of, the violence and abuse are kept separate from each other when receiving support'. This will be equally important for issues of gender-based violence and sexual violence, especially issues such as FGM.*

We have also previously suggested that Recommendations 10 and 11 of the NICE Guidelines should be observed when considering the development of content under Level 2 of the NTF. We note that the only detail about the development of and ensuring commissioning care pathways is that it will be tailored per profession. We look forward to more details about the development of the care profiles in the forthcoming Ask & Act Guidance.

### **3. Do you agree with the requirements proposed in relation to group 1?**

NSPCC Cymru/Wales has welcomed the opportunity to feed in to the process of development of group 1 e-learning through the Content Delivery Group and we have made a series of comments and suggestions for elements that should be covered/ included in group 1.

We are aware that the development of the group 1 eLearning module is now complete and the package has been tested with a small audience of relevant authority representatives. As we are not a relevant authority named under the Act, NSPCC Cymru/Wales as not seen the final versions of the training so we are unable to comment on the final content.

During consultation on proposals for the NTF, NSPCC Cymru/Wales Children's Services Practitioners underlined the importance that Level One Training is framed appropriately and carefully. Considerable concerns were raised about the dangers of not doing so in the context of child protection.

Our response to the 2014 consultation on proposals for the NTF made clear our view that at Level 1 the content should be organised around the 3 top things we want participants to take away about GBV, DA, SV; and we recommended that these should be:

- o What do I need to be concerned about?
- o How do I recognise these things?
- o What do I need to do? Who do I need to contact? How do I contact them?

We therefore welcome the 3 learning outcomes that have been narrowed down for Group 1 training and we feel this will support the effectiveness and delivery of the desired outcomes of Group 1 training amongst the projected 284,000 public service employees.

Alongside specific content pertaining to children we have consistently underlined the importance of ensuring that alongside the Live Fear Free Helpline the NSPCC Helpline, NSPCC FGM Helpline and Childline are listed in both online and offline resources. We welcomed the opportunity to discuss this through the CDG and we hope that these sources of support are referenced in the final version of Group 1 training in order to ensure that public service employees are signposted to important sources of support for themselves, colleagues, friends or family.

#### **4. Do you agree with the requirements proposed in relation to group 2?**

NSPCC Cymru/Wales notes that group 2 of the NTF will provide training to support the principle of "Ask and Act" and that further detailed guidance on 'Ask and Act' will be published separately by the Welsh Government. We have welcomed early discussions about how Ask and Act should be developed in relation to children and we will be pleased to support the development of this area as work continues.

In our response to proposals on the NTF in December 2014 we highlighted a number of concerns raised by NSPCC Service Practitioners about what "Ask and Act" would mean in practice for children. It is a persistent issue for our practitioners that where professionals have completed some basic or intermediate child protection training they may feel overconfident in asking children about domestic abuse or sexual abuse. By doing so, they risk traumatising the child and putting them at risk. This can also potentially significantly damage S47 investigations. Talking to victims, perpetrators or children involved with DA, GBV or SV requires a lot of skill and experience that cannot be provided by a training course alone. We would be concerned that from a child protection and safeguarding perspective Ask and Act as the potential to lead to unsafe practice if these issues are not carefully considered. We welcome that cross over with practice on safeguarding as well as a dual route for working with children and dealing with disclosures from children and young people is being considered as part of separate Guidance on 'Ask and Act'. We would also recommend that it would be beneficial to seek the input of professionals about the nuances of **how** to appropriately ask children and young people.

In our December 2014 response, NSPCC recommended that the list of professionals that should be prioritised under Group 2 should be broadened to include CAMHS and CAF/CASS Cymru, Ambulance Staff and paramedics as well as education and social work. We are pleased to see that these groups are included as priority groups in the draft Guidance. We also welcome the additions of Maternity and postpartum settings.

#### **5. Do you agree with the requirements proposed in relation to group 3?**

We do not have detailed comments on the requirements proposed in relation to group 3.

However note the list of National Occupational Standards titles that it is envisaged that group 3 will adhere to. We would suggest that it would be important for group 3 training to also cover the issue of *how* to appropriately ask children and young people and would recommend that additional training on this element would be beneficial.

#### **6. Do you agree with the requirements proposed in relation to group 4?**

We believe that our earlier points about how children disclose and how to ask children should be also considered at group 4.

## **7. Do you agree with the work streams outlined to engage and inform group 6?**

We note the aims of the Strategic Engagement plan. However we would highlight that the Right to be safe Implementation Board mentioned on p.40 is no longer in existence replaced following the introduction of the Act by the Violence Against Women Ministerial Advisory Group.

We would also add that the new National Safeguarding Board to be established under the Social Services and Wellbeing (Wales) Act 2014 would be an important audience in future for group 6 training.

It also seems an oversight that Education leadership is not currently covered in group 6 and perhaps this needs to be revisited.

We would also suggest that it would be highly relevant to build a strengthening leadership series webinar and briefing around the online elements of VAW, DA, SV especially the role that digital and social media play in issues such as sexting, revenge porn, consent and sexual violence. The NSPCC has been doing a significant amount of work on this area from a child online safety perspective especially through our Share Aware campaign and materials. Our Alex's Willy film will shortly be available bilingually. We would be keen to explore whether we could support the Welsh Government to develop a module on this issue at group 6.

## **8. Do you agree with the requirements proposed in relation to the specialist subject syllabus?**

We support the creation of a consistent, quality assured specialist subject syllabus at group 4. We have welcomed the opportunity to feed in to the development process of the syllabus and are pleased to see that our recommendation for stand-alone modules on a series of complex and diverse issues of Violence against women, domestic abuse and how they impact on children has been taken on board. We are pleased to see a strand of the syllabus focused on children and young people and we believe that the strands of the syllabus are broadly appropriate.

We look forward to working with Welsh Government Agored Cymru to further support the development of the content of modules.

We also note on p.63 that under learning outcome 2.1 there will be training on how children and young people disclose VAWDASV. NSPCC conducted research on disclosures of Childhood Abuse, No-one noticed, no-one heard<sup>i</sup> which although focused on child sexual abuse is of relevance to this learning module. Research showed that **1 in 3 children who have been sexually abused by an adult didn't tell anyone at the time.**<sup>ii</sup> **On average it takes 7 years for young people to disclose sexual abuse.**<sup>iii</sup> Research and practice emerging over the last 30 years has consistently found that children and young people find it difficult to tell someone about the abuse they are suffering<sup>iv</sup>. Some are developmentally unable to understand that the abuse is wrong, or lack the vocabulary to describe it. Others are threatened or intimidated by the perpetrator to keep silent. Many do not speak out because they feel ashamed

and are afraid that they will not be believed. A number of children delay their disclosures for a significant period of time and some never talk about it at all<sup>v</sup>.

Delayed disclosures mean that victims of abuse often do not access the support they need to overcome their experiences until much later, and are left to deal with the consequences of abuse on their own. The impact of abuse includes mental health problems such as anxiety, depression, substance misuse, eating disorders, self-harm, anger and aggression, sexual symptoms and age inappropriate sexual behaviour<sup>vi</sup>.

Research also shows that some disclosures are not recognised, dismissed, played down or ignored, which means the young person is not supported or protected<sup>vii</sup>. We would be pleased to have further discussions on this issue to support development of level 4 modules.

### **9. Do you agree with the requirements proposed in relation to group 5?**

We do not have detailed comments about the requirements of group 5 which seem generally appropriate. We would however highlight that an outcome covering 'monitoring and evaluation' has the potential to ensure a consistent approach to data collection is embedded across Wales, in all areas covered by the Bill. Work to establish what data should/needs to be collected and how it could be collated and managed centrally would be important to ensure the training provides the opportunity to instil good practice in this area. This will be important across all areas covered by the Bill but could have significant added value in areas where data is lacking such as FGM, HBV, FM etc.

We believe better data collection by service providers has the potential to support ongoing work on service mapping and data and has the potential to support the development and relevance of national indicators. Clearly, creating a more consistent set of data based on work already going on in Wales would be important.

### **10. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

We note the point on pg.17 and section on p.45 of the Guidance making specific reference to ***'the overlap between gender-based violence, domestic abuse and sexual violence training and training on child protection and safeguarding'***. We welcome that this section is now flagged at the beginning of the Guidance but still believe that the whole section may be better situated at the beginning of the Guidance.

We would also highlight that we have reservations about the current wording on both p.17 and p.48: *'it is important gender-based violence, domestic abuse and sexual violence are **not only** seen as issues of child protection. The purposes of this specific, focussed Framework is to acknowledge gender-based violence, domestic abuse and sexual violence as significant social care, public health and social justice issues, directly affecting a significant proportion of the Welsh population, including children and young people, as primary issues.* We would argue that this section should be re-worded, especially given that Witnessing

Domestic Abuse is now recognised as significant harm and child abuse. In addition in the context of children, all issues of VAW, DA, SV in the bill ARE issues of child safeguarding and should be recognised by professionals as such.

We do however recognise and support the point that the Guidance is aiming to make i.e. that there is additional training on issues of VAW, DA, SV that need to be provided alongside and over and above an organisation's requirements for safeguarding training. We would therefore suggest alternative wording:

*"It is important to recognise that gender-based violence, domestic abuse and sexual violence **ARE** issues of child safeguarding and require a safeguarding response. However, it is also important to recognise the need for additional training on these issues. The purposes of this specific, focussed Framework is to acknowledge gender-based violence, domestic abuse and sexual violence as significant social care, public health and social justice issues in their own right, directly affecting a significant proportion of the Welsh population, including children and young people. The NTF is recognition of the need for additional training focused on these issues."*

Reflecting points made throughout this section we agree that the approach to children needs to be as part of a holistic approach to the whole family while also recognising the gender-based nature of these issues. We believe that ensuring that training through the NTF which supports understanding of this sort holistic approach would be necessary. The NSPCC's work on domestic abuse, evaluating programmes that work with both mothers and fathers domestic abuse – show the potential for a joined up family support approach focused on providing protection and support for children.

Linked to this we would also argue that appropriately developed content under the NTF provides an opportunity for an approach that empowers children and young people to ensure that the services and protection they receive reflect their own experiences and provide them with the support they need. We would like to see more consultation with children and young people as content under the various levels of the consultation is finalised and refreshed during the life of the NTF.

**We give permission for this response to be made public, on the internet or in a report.**

---

<sup>i</sup> Radford, L et al., (2011) Child abuse and neglect in the UK today. London: NSPCC

<sup>ii</sup> Ibid.

<sup>iii</sup> Allnock, D and Miller, P (2013) No one noticed, no one heard: A study of disclosures of childhood abuse. London: NSPCC

<sup>iv</sup> Ibid.

<sup>v</sup> London, K, Bruck, M, Ceci, S. J and Shuman, D. W (2005) Disclosure of child sexual abuse: What does the research tell us about the ways that children tell? *Psychology, Public Policy & the Law* 11(1) pp. 194-226; McElvaney, R (2013) Disclosure of child sexual abuse: Delays, non-disclosure and partial disclosure. What the research tells us and implications for practice. *Child Abuse Review* 24 (3) pp. 159-169

<sup>vi</sup> Lanktree, C. B, Gilbert, A. M, Briere, J, Taylor, N, Chen, K, Maida, C. A and Saltzman, W. R (2008) Multi-informant assessment of maltreated children: convergent and discriminant validity of the TSCC and TSCYC. *Child Abuse Neglect* 32 (6) pp. 621-625

<sup>vii</sup> Allnock, D and Miller, P (2013) No one noticed, no one heard: A study of disclosures of childhood abuse. London: NSPCC.