



Response to

Welsh Government's Consultation on the National Strategy on Violence Against Women, Domestic Abuse and Sexual Violence

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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. Learning about what works in the fight against abuse and neglect is central to what we do. We are committed to carrying out research **and evaluation to make sure the approaches we're taking are** the right ones and we share what we have learnt with partners.

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.

NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation. The Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 is a landmark piece of legislation and we welcome the opportunity it provides to improve the public sector response and raise further awareness of violence against women, domestic abuse and sexual violence. If the intention of the Act is to be achieved, we all need to seize the opportunity and optimise implementation to prevent abuse and better protect and support survivors in Wales. Along with the Well-being of Future Generations (Wales) Act 2015 and the Social Services and Well-being (Wales) Act 2014, this is a key moment to break the intergenerational transmission of domestic violence.

Domestic abuse, substance abuse and mental health problems are known risk factors for all forms of child abuse and neglect. These parental stressors often occur together, and have a cumulative effect - the more of them there are in the family, the greater the risk to the child. Reviews of cases where a child has died or been seriously injured regularly find that some or all of these factors were present. So NSPCC Cymru/ Wales will do all it can to seize the opportunities the Act presents to ensure that children are kept safe from abuse and neglect as a result of domestic abuse and sexual violence.

Children who are abused and neglected are more likely to experience negative outcomes in adulthood including mental ill health, problems with

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substance use and live in households with domestic abuse. This risks the abuse and neglect to their own children.

The experience of living in a household where the parents or carers are abusive to one another **is** child abuse¹. The NSPCC therefore sees working with families facing adversity as a core priority and our focus is on supporting parents or carers with these problems to prevent abuse or neglect.

It must also be recognised that sexual coercion and harassment emerges in the lives of pre-teen children and a significant proportion of young people experience physical abuse and some forms of sexual partner violence in their intimate partner relationships.

Do you agree with the priorities under prevention?

Do you have any further suggestions? Please include any evidence (data, research or anecdotal):

In principle we agree with the priorities but we feel that the Objectives need to be a lot more robust, clear about what outcome will be achieved, with specific detail on what action, will be taken, by whom and by when, and how achievement will be measured.

Objective 2: Enhance education about healthy relationships and gender equality

NSPCC Cymru/Wales believes that it's crucial to educate young people about healthy relationships if we are to break the cycle of domestic abuse. We all have a responsibility to ensure that children are safe. The fact that schools form such a fundamental part of children's lives means that school staff and communities have an especially important role to help children and young people understand what is a healthy relationship and what is not. It is at school that children will form many of the relationships and learn many of the behaviours which will have an important bearing on how they make the transition into adulthood.

There is growing research evidence that patterns of sexual coercion and harassment are not confined to older teens but are emerging in the everyday lives of pre-teen children.

¹ Section 120 of the Adoption and Children Act 2002 amended the definition of harm to a child to include witnessing domestic abuse

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In Wales, the 'Boys and Girls Speak Out' (2013) research carried out on behalf of the National Assembly for Wales Cross Party Group on Children's Sexuality, Sexualisation and Equalities (funded by NSPCC Cymru/Wales, Cardiff University and the Office of the Children's Commissioner for Wales) revealed that most children age 10-12 reported either witnessing or experiencing direct or indirect incidents of sexual harassment, particularly slut-shaming and anti-gay talk (at school, in the street, and online), with gender stereotypes used by children and some staff to justify these forms of harassment. Overall the research found that children were ill-equipped to deal with sexual harassment and very few felt comfortable talking about these issues with parents or teachers.

Further evidence shows the scale of this problem:

- Data published in September 2015 revealed that 5,500 sexual offences were recorded in UK schools over a three year period, including 600 rapes.²
- In a study of young people by the NSPCC (2009), a quarter of the girls and 18 per cent of the boys experienced physical abuse; three quarters of the girls and 14 per cent of the boys experienced physical abuse, and a third of the girls and 16 per cent of the boys experienced some form of sexual partner violence.³
- Data from the NSPCC's ChildLine service reveals a culture of sexual harassment which, starting from their school relationships, extends across the spectrum of children's experiences, including online. It can leave them isolated, with many having no outlet to escape abuse.

This is why NSPCC Cymru/Wales believes that **core and mandatory curriculum on healthy relationships taught from a gender equality perspective; co-produced with children and young people and delivered by appropriately trained practitioners is needed** to ensure ALL school age children and young people receive a comprehensive and inclusive sexuality and relationships education that addresses the complex

² <http://www.bbc.co.uk/news/education-34138287>

³ Barter et al (2009): School-based cross-sectional survey of 1500 young people aged 13 to 17 in England, Scotland and Wales and 80 interviews with young people (NSPCC funded);

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ways in which inter-personal gender-based and sexual harassment impacts upon their lives.

However the actions under objective 2 fall far short of this. We would recommend that the actions are reworded to make them clear and SMART.

The first action under objective 2 should be changed to:

- **Train all teaching professionals about the signs of signs of violence against women, domestic abuse and sexual violence by [date]**

The third action should be changed to:

- **Healthy relationships education, taught from a gender equality perspective, will become mandatory and embedded in the Health and Well-being area of learning experience of the new curriculum by [date]. We would also like to see concrete plans in the delivery programme about how the pioneer schools are piloting healthy relationships education.**

We welcome that the Act included provisions to require local authorities to publish prescribed information to show how their education functions are being exercised to promote the purposes of the legislation. The legislation was also followed by the publication of Welsh Government Guidance on 'Good Practice on delivering Whole Education Approaches to Preventing Violence against Women, Domestic Abuse and Sexual Violence.' We are strongly supportive of and have contributed content and case studies to the Guidance. However, we have concerns about implementation.

We believe it is important to unpick the practical steps schools need to take to successfully deliver all of the different elements of a whole school approach, and understand where the prevention of sexual harassment and violence sits within this scope. It is also important to understand the needs of schools and teachers to help them embed and deliver this approach successfully, consistently and safely.

The second action under objective 2 should be changed to:

- **Review how successfully schools have implemented the 'Good Practice on delivering Whole Education Approaches to Preventing Violence against Women, Domestic Abuse and Sexual Violence' guidance and working with schools develop**

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an implementation plan (which includes communication, support and training) by [date]

As part of this, schools also need to be supported to incorporate innovative approaches. Cardiff University (Professor Renold), NSPCC Cymru/Wales and Welsh Women's Aid, supported by the Office of the Children's Commissioner for Wales have been working in partnership with young people over the last year on '*AGENDA: A Young People's Guide to Making Positive Relationships Matter*'. AGENDA will be launched in November 2016 with support from the Cabinet Secretary for Communities and Children. AGENDA is intended to be a change-making toolkit for young people who wish to get involved in promoting gender well-being and gender equalities for respectful and healthy relationships. AGENDA has been designed to showcase and provide practical examples of how change-making can be embedded in the learning process. We believe it is imperative that children and young people's views are at the forefront of the development of PSE/SRE content on healthy relationships and we believe that this important and innovative work should be embedded in the Strategy. **We recommend that an action be added to Objective 2 that makes clear how AGENDA will be communicated to schools and how schools can access support to assist them in using it to help young people take action in order to promote respectful and healthy relationships.**

Given that currently, PSE (and a comprehensive healthy relationships education programme) is not mandatory and as such, provision is at the discretion of each individual school, many teachers may find both time and resources for training hard to negotiate. Mandatory and regular training for all staff by experts in the field of gender and sexuality education, violence against girls and women, and LGBTQA+ and transgender+ is imperative for the implementation of any education approach and the whole-school approaches described above. There also needs to be clear guidance on how to create safe spaces for children to talk about and challenge everyday sexism and sexual harassment.

A fully resourced and regularly evaluated approach will be vital to achieving the prevention ambitions of the Strategy. **We believe having a core mandatory curriculum, independently evaluated and inspected by Estyn (Wales) with evidenced based learning outcomes and resources is an essential part of ensuring consistency and quality.**

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We also believe that the online aspects of these issues needs to be much better understood and we would like to see this taken into account in the Strategy. Data from ChildLine provides a sense of the relevance of the online element to some of these issues:

- In 2015/2016 ChildLine carried out 1,392 counselling sessions relating to sexting, an increase of 15 per cent on the previous year.
- **The 'sexting' advice page is the most viewed page on the ChildLine website.**
- In 2015/16 ChildLine carried out 25,740 counselling sessions where the main concern was bullying or online bullying.
- In 2015/16 ChildLine carried out 7,357 counselling sessions where children had raised concerns over online safety or cyber bullying.
- In 2014/15 ChildLine carried out 1,129 counselling sessions with children had raised concerns about being exposed to sexually explicit online images and/or content.⁴

The internet has a huge bearing on how children interact with one another. Schools should therefore have policies in place which address how technology such as social media can be used to perpetrate abuse both inside school and outside in the wider community. Work through the HWB website is positive and we would like to see this go further so that online and digital safety should be provided as a compulsory part of the school curriculum as part of wider efforts to develop a whole school ethos **focussed on increasing young people's awareness and understanding of** the motivations, consequences and risks of some online behaviour. We would like to see schools ensuring that children and young people are able to recognise abusive, coercive and exploitative online behaviour, and understand what constitutes inappropriate behaviour and relationships online. Children also need guidance on blocking unwanted sexual approaches, not being drawn in by manipulative behaviours, understanding what coercive and controlling behaviour can look like online, and know where to report suspicious activity and access support.

Schools also need to have clear reporting mechanisms for both on and off-line abuse that have clearly signposted support services (both in

⁴ Last year around 1.2 million children and young people contacted the NSPCC's Childline service resulting in over 300,000 in-depth counselling sessions.

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school and outside of school). All of this should be developed with young people, parents and teachers.

Objective 3: Challenge perpetrators, hold them accountable for their actions and provide interventions and support to change their behaviour.

We welcome that the National Strategy document and forthcoming Perpetrators Guidance recognises that working with perpetrators of VAWDASV has to be a key plank of any strategic approach to prevent violence against women and domestic abuse. However we would suggest that Guidance is necessary to ensure this is understood as part of a holistic approach and we believe that relevant authorities need **stronger guidance on the different types of service provision and minimum standards that must be available in each local authority area.**

There is a need for further guidance around the availability and effectiveness of domestic violence perpetrator programmes (DVPPs), especially to assist with local commissioning. There is concern about lack of coverage of DVPPs across all parts of Wales. Issues of rurality and geography mean that there are many areas without provision or transport issues (with associated cost implications for potential participants). Sustainability of funding for such programmes is also key.

We believe that DVPPs need to be one strand of a wider framework of services that work with perpetrators to prevent domestic abuse. Programmes that work with fathers to prevent domestic abuse in households with children should also be a strand. NSPCC's **Caring Dads Safer Children (CDSC) Programme** is "a parenting programme for domestically abusive fathers"⁵. **The programme uses the men's role as a father to motivate them to change their behaviour and thereby reduce the risk of further harm to their children.** We would highlight that it is important to note that CDSC is distinct from other programmes aimed at domestic abuse perpetrators in a number of key ways. It is described as a parenting programme, but it differs from most parenting programmes, which **usually give precedence to the parents' ability to make the best decisions for their family.** As fathers attending CDSC have already

⁵ McConnell, N., Barnard, M., Holdsworth, T. and Taylor, J. (2014) Caring Dads: Safer Children: Interim Evaluation Report. NSPCC: London. P.13.

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demonstrated that they may put their children at risk of harm⁶, an intervention that can help them to change their decision making and behaviour is required. Second, while CDSC seeks to stop partner abuse, it does not purport to be a domestic violence perpetrator programme as understood within a UK context⁷ although many of the considerations for service delivery will be similar. Equally, attendance at CDSC should not be considered an alternative to the criminal justice sanctions.⁸

An evaluation of CDSC found **promising evidence that the programme can contribute to reducing risks to children**, including evidence of sustained change among some fathers who complete the programme. Fathers and partners reported fewer incidents of domestic abuse post-programme:⁹

- Potential risks to children appeared to reduce as fathers generally found being a parent less stressful and interacted better with their children after they had attended the programme.
- Qualitative data provided illustrations of how the programme can **bring about positive improvements in the fathers' behaviour.**
- However, some fathers did not change sufficiently despite completing the programme.
- **Sustained improvements in the fathers' behaviour appeared to contribute to increased feelings of safety and wellbeing within their families.**

Learning about what works in the fight against abuse and neglect is central to what we do – we need **to know that what we're doing is effective and that it improves children's lives. That is why we have**

6 Scott, K.L. and Lishak, V. (2012) Intervention for maltreating fathers: Statistically and clinically significant change. *Child Abuse & Neglect*, 36:9, pp680–684.

7 Respect (2012) *The Respect Accreditation Standard, Second Edition*. London: Respect.

8 McConnell, N., Barnard M, Holdsworth T and Taylor J (2016) *Caring Dads: Safer Children: Evaluation Report*. NSPCC: London

9 McConnell, N., Barnard, M., Holdsworth, T. and Taylor, J. (2016) *Caring Dads: Safer Children: evaluation report*. London: NSPCC. Available at <https://www.nspcc.org.uk/globalassets/documents/evaluation-of-services/caring-dads-safer-children-evaluation-report.pdf>

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recently launched our impact and evidence hub, which uses evaluation, research and evidence to protect children and prevent abuse and we would be happy to share this learning with Welsh Government.

Do you agree with the priorities under protection?

Do you have any further suggestions? Please include any evidence (data, research or anecdotal):

In principle we agree with the priorities but we feel that the Objectives need to be a lot more robust, clear about what outcome will be achieved, with specific detail on what action, will be taken, by whom and by when, and how achievement will be measured.

- **Objective 4: Ensure professionals are trained to provide effective, timely and appropriate responses to victims and survivors.**

We think that this section of the National Strategy should make clear that children living in a household where the parents or carers are abusive to one another *is* child abuse and that the duty to report a child at risk under the Social Services and Well-being Act should always be followed where there is knowledge of or a suspicion of household domestic violence. We would also recommend that the actions for children under protection should be separated out from the other actions with a sub-objective of **Ensuring children are protected when experiencing or witnessing domestic violence.**

The views of victims and survivors: We welcome the fact that the draft strategy has been informed by the recommendations and priorities of Welsh adult survivor voices and it is powerful to hear the impact of effective protective services in the quotes included in this section of the Strategy. However, we want to see the recommendations from that report included as actions in the National Strategy.

We also want to emphasise how important it is that the voices of children and young people are also taken into account as part of this process. **Welsh Women's Aid estimated that** 150,000 children are experiencing domestic abuse in their homes or in their teenage relationships at any time. We welcome the proposal to develop a national survivor engagement framework but the second action under objective 4 needs to

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make clear how the views of children and young people experiencing domestic abuse will be heard and responded to. NSPCC Cymru/Wales would be happy to assist Welsh Government with this. We are currently in the process of consulting with children and young people to find out how professionals should really listen to them and hear what they say with a view to developing a set of Listening Standards. These will be available in early 2017 and we would welcome the chance to share this learning.

Referral Pathways & Ask & Act NSPCC Cymru/Wales welcomes the introduction of "Ask & Act" as a process of targeted enquiry to be practiced across public services to identify violence against women, domestic abuse and sexual violence. Our key priority for Ask & Act is that it improves the response to and therefore support for children. It remains the case that key agencies do not always appreciate that the incidence of domestic violence should be seen as an indicator for assessing those children who are living in the same house as the victim.¹⁰ Section 120 of the Adoption and Children Act 2002 extends the legal definition of 'significant harm' to children to include witnessing the abuse or harm of another. Therefore, Domestic Abuse *is* child abuse. It should be made clear that as soon as vulnerability or indicators are spotted in an adult, the next question should be to ask whether there are children present in the home. This would be a trigger to relevant safeguarding referrals procedures to be followed, and ensure that the right services are made available at the right time.

Helplines: The Strategy refers to the Live Fear Free Helpline as a safe confidential place for victims to gain advice and disclose abuse. We would like to suggest that, as the Strategy covers children, it would **also be helpful to include the NSPCC helplines**. Our services include the 24/7 NSPCC Helpline for anyone concerned about the welfare of a child and we provide support for all children and young people through Childline via telephone, email or online, 24 hours a day/365 days a year. Data from **NSPCC's helpline** has revealed that there has been a rise in the number of Welsh adults worried about children suffering or witnessing physical violence in their own home; there has been a 58% increase in the number of people concerned about domestic abuse. (There were 170 contacts from Wales in 2015/16, up from 104 in 2011/12.)

¹⁰ Clarke, A. and Wydall, S (2013). From 'Rights to Action': practitioners' perceptions of the needs of children experiencing domestic violence. Child & Family Social Work Volume 20, Issue 2, pages 181-190, May 2015.

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Keeping Learners Safe – We welcome the reference to Keeping Learners Safe guidance, as schools form such a fundamental part of children’s lives means that school staff and communities have an especially important role in ensuring that children are kept safe. It’s important that this guidance is kept updated to reflect changes in what children and young people are experiencing at school. As noted above (under Objective 2), Childline is carrying out an increasing number of counselling sessions relating to sexting, and we believe that the Keeping Learners Safe Guidance should be updated, or further guidance issued, to reflect this.

We also recommend that the action ‘Work with Families First and Flying Start services to ensure appropriate support services are provided to victims of violence against women, domestic abuse and sexual violence’ should be made more clear and SMART.

We would recommend that it is changed to:

Welsh Government will ensure that evidence based support services and parenting programmes to tackle domestic abuse and keep children safe will be delivered as part of all Families First and Flying Start programmes by [date]

We would like to highlight here the NSPCC’s Speak Out Stay Safe service, which delivers safeguarding messages directly to children through assemblies and workshops, run by specially-trained staff and volunteers, for children from the age of 5 to 11. This service is aiming to reach every primary school in Wales and we believe it can play an important role in ensuring that more children are empowered to speak out and know whether they can turn to for support.

Do you agree with the priorities under support?

Do you have any further suggestions? Please include any evidence (data, research or anecdotal):

In principle we agree with the priorities but we feel that the Objectives need to be a lot more robust, clear about what outcome will be achieved, with specific detail on what action, will be taken, by whom and by when, and how achievement will be measured.

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We welcome the inclusion of Support as a priority in the National Strategy consultation document. However, NSPCC Cymru/Wales feels that the Strategy fails to address the rights and needs of children as individuals, particularly in relation to services and the support needed. We know that the impact of abuse can include mental health problems such as anxiety, depression, substance misuse, eating disorders, self-harm, anger and aggression, sexual symptoms and age inappropriate sexual behaviour.¹¹ Receiving the right support at the right time can mean the difference between overcoming their trauma, or a life shaped by the horror of their experiences. However, **we remain concerned that there remains a lack of evidence about 'what works' for children who are abused due to witnessing or experiencing domestic abuse.** As part of the strategy or work programme Welsh Government should map the provision of services for children witnessing or experiencing domestic abuse in Wales. Support can take many forms and it's important that those who are commissioning services take a holistic approach.

We would like to see **further detail in the Strategy on the provision of services to children,** based on their own rights under the UNCRC. The fragmented 'stop start' nature of services for children and families experiencing domestic abuse has been highlighted by recent research¹² This includes the needs of young people who experience domestic abuse in their own relationships. Currently 'adult' programmes are often merely adapted to be 'delivered' for young people, rather than trying to understand how their relationships (and therefore the abusive behaviour) may need a different response. There is currently a severe lack of **sufficient 'specific' provision for children, in accordance with Article 19 UNCRC,** to match the evidence of need. Concerns have consistently been raised by stakeholders about the existing post-code lottery of services across Wales and we are concerned about the wide variation in expertise and capacity to provide the sorts of specialised services needed to provide adequate support to children. We would suggest that the Strategy includes stronger emphasis on improving services to children and young

11 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

¹² Thatcher, C. *You've Given Us a Voice Now Listen*. Cardiff: Welsh Women's Aid; Stanley, N. et al (2010) *Children's Experiences of domestic violence: Developing an integrated response from police and Child Protection Services*. UCLAN/NSPCC

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people, and that the **forthcoming Commissioning guidance includes specific guidance for local commissioners to support their commissioning of specialist services for children and young people.** Without this there is a risk that services for children and young people will not be given the adequate and consistent attention that they need. Such guidance is vital to supporting a holistic approach at a local level that combines to create a strategically joined-up and consistent approach to service users across Wales. We have concerns around the impact that delays on publishing this guidance may have on local commissioning, and we would welcome the publication of the finalised guidance as soon as possible.

It also remains the case that children are rarely given opportunities to express their views about what they feel is effective and become involved in decisions about the type of services they need.¹³ As highlighted above, the **development of a national survivor engagement framework needs to take into consideration how to engage with children and young people effectively and appropriately so that their voices are also heard.** NSPCC has recently engaged with a Young Experts Group (young people with experience of abuse) who have developed a set of child-centred principles that should underpin future services to support

“You want support from the same person, someone that understands the words you’ve said, not someone else who reads notes and understands them differently.”

“The room should be comfortable and spacious – not like a hospital. There should be artwork...and children’s rooms”

“Your mind becomes a prison. In a prison you always see the same walls, the same things prevent you doing things. Support is like the key, but it’s on a chain of 90 keys. Not all of them work, but when you get the right help it sets you free. But you need to be able to try different support, knowing that it is there gives you hope.”

Quotes from *A Force For Change*, our group of young experts who have experienced abuse.

children and young people who have been abused.¹⁴

13 Radford, L., Aitkin, R., Miller, P., Ellis, J., Roberts, J., and Kirkc, A. (2011). *Meeting the Needs of Children living with domestic abuse in London*. London: Refuge/NSPCC research project, funded by the City Bridge Trust.

¹⁴ <https://www.nspcc.org.uk/globalassets/documents/research-reports/its-time-campaign-report.pdf>

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Sustainable funding is of course key to the provision of appropriately resourced and high quality services to children and young people, and we welcome the mention of the development of a sustainable funding model for service providers. We have some anecdotal evidence that in some areas, funding for specialist domestic abuse services has been reduced and some services de-commissioned. If Wales is to seize this opportunity to break the intergenerational transmission of domestic abuse, funding for support and treatment services is essential.

We welcome the news that a review of the various funding streams for **Children's Services with specialist** services will be undertaken. NSPCC has delivered and evaluated some services that aim to help reduce domestic abuse in the home and to help them recover after the perpetrator has left and we feel there is a lot more work to do around this. We would appreciate further information on the timeline of the review, and would welcome the opportunity to get involved and share our learning.

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 welcome the fact that the Strategy makes clear that the well-being of children and young people needs to be a priority, but there needs to be more detail on **how** this should happen. We are disappointed that the accompanying delivery plan is not also available and that it will not be subject to consultation. We feel that the Objectives contained within the Strategy need to be a lot more robust, clear about what outcome will be achieved, with specific detail on what action will be taken, by whom and by when, and how achievement will be measured. In parts of our response we have suggested re-wording some of the actions that will make them SMART. Indicators developed need to be underpinned by the UNCRC, and also need to align with other Outcomes Frameworks being developed by Welsh Government, particularly under the Social Services and Wellbeing (Wales) Act, the Together for Mental Health Outcomes and the joint Families First, Flying Start and Communities First outcomes.

Cross governmental approach: As it stands, there is lack of clarity over how a joined-up approach will be achieved in order to deliver the measures listed under the objectives. Although the Strategy mentions a number of other key pieces of Welsh legislation which impact on this area,

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we are unclear about how these will work together to contribute to achieving the aims of the Act, and how this Strategy will filter through to various pieces of Guidance issued under these pieces of legislation. It is also vital that all relevant government directorates work together to develop the national strategy, each playing their part in addressing violence against women, domestic abuse and sexual violence. Currently **the draft uses terms such as 'support' and 'work with' and we would like to see in clear terms what the other directorates will be doing; the VAWDA team is too small to do this alone!**

Budget: Nowhere is it made clear what budget is available to deliver the national strategy. We would welcome clarity about what budget is available to deliver the different objectives of the final national strategy and also to ensure the preventative and support services are available in local areas.

Local strategies and the links with the national strategy: We are particularly concerned about the lack of clarity about how local strategies by Local Authorities and Local Health Boards will be informed by this National Strategy. We believe the framework from the National Strategy should be the framework used in the local strategies. We also think there should be clarity about what is required and must be included in local strategies. This leads to a further more general question about governance and accountability. Who is accountable for the delivery of the local strategies and how will local delivery be scrutinised? In addition, will Welsh Government be approving the local strategies? We would welcome further clarity on these points in the final National Strategy.

We welcome the recognition that violence against women, including domestic abuse or sexual violence in any family unit that includes children is a child protection issue. Signposting to safeguarding procedures, including the *All Wales Child Protection Procedures* and *Safeguarding Children: Working Together under the Children Act 2004* would strengthen this point.

A rights-based approach: We note the reference to the UNCRC on page 8 of the document, however the importance of the UNCRC and the Rights of Children and Young People (Wales) Measure 2011 is not made clear here. NSPCC Cymru/Wales believes that situating the development of the

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national and local strategies under Section 16 of the Act firmly within a UNCRC-based framework is important to ensure that the specific needs and vulnerabilities of children and young people are taken into account. We note that a Welsh Language Impact Assessment has been published alongside this draft Strategy and we would welcome publication of the **Children's Rights Impact Assessment (CRIA)**. We would recommend that this be made public alongside the final national strategy.

Definitions: NSPCC Cymru/Wales shares the concerns of Welsh Women's Aid and the Violence Against Women Action Group about the definitions used in the Strategy. The definitions used in this draft national strategy are not consistent with the United Nations, international and UK recognised definitions of domestic abuse and violence against women. The Right to be Safe strategy of 2010 included the internationally accepted definition of violence against women, placing it clearly within an equality and human rights framework. We believe it is essential that the UN definitions are used in the final national strategy so that work in Wales is aligned with the UK Government and other devolved nations.

Sexual Violence: NSPCC Cymru/Wales is concerned that the main focus of the draft Strategy is on Domestic Abuse, meaning that Sexual Violence and Violence against Women are not as adequately incorporated into the document. We also note that Child Sexual Abuse is mentioned in the Strategy (on page 10), however there is lack of clarity around how this fits under the Strategy. We would welcome clarification on whether Child Sexual Abuse falls under Sexual Violence as covered by the Act. Sexual Exploitation is also mentioned (page 12) but there is no reference to the National Action Plan to Tackle Child Sexual Exploitation, or how these will work together.

Powers of the National Adviser: NSPCC Cymru/Wales is looking forward to working with the National Adviser to ensure implementation of the Act. We are concerned about the lack of detail in the Strategy around the role the National Adviser will have in ensuring scrutiny of local strategies by Local Authorities and Local Health Boards and how they will be supported by Welsh Government to fulfil this role. We would also welcome further clarity about the role the National Adviser has played in the development of the National Strategy document.

Guidance: NSPCC Cymru/Wales welcomed the opportunity to comment on the draft guidance that has been published to accompany the Act: the

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National Training Framework, Ask and Act and Multi Agency Collaboration and the Perpetrators Guidance. However we have concerns about the impact of the delays in publishing these pieces of guidance, especially as the National and Local Strategies that are required by the Act should have regard to this guidance. We are particularly concerned that Commissioning Guidance has not been published which should aim to ensure that no matter where a victim lives, there is a strong public and specialist service ready to help. As highlighted above, without specific guidance for local commissioners to support their commissioning of specialist services under the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, we believe there is a risk that services for children and young people will not be given the adequate and consistent attention across all areas of Wales that they need.

FGM/ HBV: NSPCC Cymru/Wales remains concerned about the lack of clarity over how Female Genital Mutilation (FGM) fits under both the Act and the draft Strategy. The relevant authorities covered by the Act need better guidance on what can be done to prevent FGM and support those affected by it. Although there is reference to FGM in the draft Strategy under the Prevention strand, we believe that more work needs to be done to mainstream its inclusion across the whole document. The Welsh Government, with the establishment of the Wales National Strategic HBV Leadership Group and delivery plan has instigated a strategic approach attempting to tackle HBV/FGM in Wales and the document should be more reflective of this. There is also key work in data collection and Health that could be better reflected and should be better communicated from a National to Local level. We would recommend that the Committee seeks formal input from the Strategic Leadership Group (SLG). Part of the work by the SLG work included Welsh Government funding and support for the Voices over Silence project, which saw NSPCC Cymru/Wales and Bawso work with a group of 16 young women during a 6 month period to upskill them as youth ambassadors on FGM and co-create resources which aim to spark conversations about FGM in schools and communities across Wales. We would like to see this work included in the National Strategy and Delivery Plan to ensure **these campaigning materials are disseminated, aiming to change attitudes to FGM, under Objective 1.**

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