



Welsh Women's Aid Response: A call for information – Welsh Government Draft Budget proposals for 2021-22

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These are the views of:	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (comprising our membership of specialist services and members of the regional VAWDASV Specialist Services Providers Forums).¹ These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy

¹ Our membership of 22 third sector violence against women, domestic abuse and sexual violence specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated includes: Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Clwyd Alyn Housing Association (CAHA) Women's Aid, Stepping Stones, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU), Gorwel (Grwp Cynefin), Montgomeryshire Family Crisis Centre, Newport Women's Aid, North Denbighshire Domestic Abuse Service, Port Talbot & Afan Women's Aid, RCT Women's Aid, Safer Wales (including Dyn Project), Swansea Women's Aid, Threshold, West Wales Domestic Abuse Service and Rape and Sexual Abuse Support Centre (RASASC) North Wales.



and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors.

We also deliver the Wales National Quality Service Standards (NQSS), a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found here: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)

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Introduction

Welsh Women's Aid welcomes the opportunity to respond to this call for information. At the time of submitting this response we will have recently launched our annual [State of the Sector report](#).²³

This year's report, *Time to Act on Sustainability*, calls on the Welsh Government to deliver on its commitment to develop a sustainable funding model for the Violence Against Women Domestic Abuse and Sexual Violence (VAWDASV) specialist sector. The report outlines why sustainable funding is absolutely crucial to ensuring survivors receive safety and support and outlines practically how the model can be developed.

We highlighted some key costings within the document which we hope will help inform the development of both a sustainable funding model, and the 2021-22 budget.

- Costings for refuge along with community based provision: Based on population size Wales needs 314 refuge spaces. These need to be fully accessible and fully supported including support for children and young people in refuge. A proportion should be ring-fenced for specialist 'by and for' services that understand the particular barriers to reporting and help-seeking among those who are marginalised.
Delivering fully funded refuge support across Wales will cost £22,035,958
- Costings for sexual violence: Based on population size Wales needs 16 rape crisis centres and sexual assault referral centres. These need to offer support to recent and historic survivors of sexual violence, as the impact of sexual violence can be life long and survivors often seek support a period of time after the experience. They provide specialist therapeutic support, practical and emotional support as well as support through the criminal justice system where

² <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/State-of-the-sector-2020-PDFdesign.pdf>

³ https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/CYM_State-of-the-sector-2020-PDFdesign-1.pdf



a survivor wishes to report. Delivering fully funded sexual violence support across Wales will cost £20,800,000.

- Children and young people experience VAWDASV in their own right and are recognised as victims. They have a right to support that can specifically address their experiences of abuse and violence and enable them to have healthy relationships in the future. Investing in provision for children and young people including support for children living in refuge, community based support and specialist therapeutic support for children exposed to domestic abuse would cost £11,088,416.

The commitment for sustainable funding must be delivered if we are to guarantee that support for survivors will be available when they need it, and should be part of Welsh Government plans for future budgets.

1. What, in your opinion, has been the impact of the Welsh Government's 2020-21 budget including recent funding related to COVID-19?

VAWDASV Grant:

Welsh Women's Aid welcomed the uplift in the VAWDASV grant in the 2021-21 budget, including the £1.2 million to fund community accommodation for survivors of domestic abuse, as well as an additional £200,000 for furnishings, computer equipment and white goods announced in December 2019. This capital funding was intended to improve provision such as move on and dispersed units for survivors that had faced barriers to accessing support due to additional needs. These needs had been evidenced through specialist service data that shows 574 survivors were unable to access the refuge support they needed due to lack of space, capacity and resources in 2019-20. Our [joint report](#) with Disability Wales highlighted the need for specific and targeted funding to ensure services were accessible and could meet the needs of all survivors. Following pandemic Welsh Government has repurposed pre-existing pots to now address the issues caused by COVID-19, while flexibility has been welcomed the future budget will need to ensure funding is provided to address the original needs that still exist and need to be resourced with even greater urgency than before with significant increases in the complexity of demand.

It needs to be recognised the Welsh Government VAWDASV Grant, is only a small proportion of the funding that specialist services received to enable them to deliver support. As set out in the costings above, the VAWDASV Grant does not cover the significant amount of costs that it takes to have a network of specialist VAWDASV services across Wales. Specialist services are primarily funded through other government funding streams administered via local authorities and situated in other government directorate budgets, including Housing Support Grant, Community and Children's Grant as well as non-devolved funding via PCCs or UK Government such as the Rape Support Fund.

The Housing Support Grant is a vital to ensuring accommodation based provision is provided. Last year Cymorth Cymru, Community Housing Cymru and Welsh Women's Aid called for funding to be

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increased for the Housing Support Grant, which delivers homelessness prevention and housing-related support services in Wales. Welsh Women's Aid noted the additional £13,088,251 would mean that no survivor is turned away and that services are able to provide change that lasts through a holistic model of support from identification to recovery including supporting children and young people alongside the non-abusive parent. This remains the case, as stated above with the number of survivors that continue to face barriers to accessing support. The pandemic has magnified the importance of a safe home. Each survivor's needs will be unique to their experience, services must be well resourced to offer this flexibility. There is also a clear need to strengthen protections and options for survivors of sexual exploitation

Emergency Funding:

£10 million Welsh Government fund to support people experiencing homelessness in Wales during the COVID-19 pandemic was announced by Welsh Government mid-March, with reference to provision for people experiencing VAWDASV. Although welcomed, these funds being administered by local authorities have focused on rough sleeping. Women's homelessness is often hidden and linked to or resulting in abuse and exploitation. As such, the fund has done little to better equip VAWDASV services to deal with their increasing struggles, and for survivors to be able to access specialist support when they need it. Phase 2 plans produced by local authorities for the next wave of funding are limited in their inclusion of VAWDASV provision. Services working with survivors of sexual exploitation, who present with the most complex needs, report a dearth of housing provision and appropriate housing responses to meet women's needs.

The additional £1.5 million emergency fund provided to the specialist sector was also welcomed to meet COVID-19 related costs. This has helped cover costs such as PPE, additional cleaning, technology to maintain contact with survivors and equipment to engage children in refuge. These funds have been administered through regional approaches. While in some regions approaches were effective in identifying needs of local services and administering swift access to funds. Some specialist services have noted this has not happened swiftly across all regions and levels of monitoring have been bureaucratic and burdensome in some areas. Greater oversight and leadership from Welsh Government is required to ensure that funding is administered with equitable processes across all regions. This would be greatly helped through the implementation of a sustainable funding model and monitoring of adherence to the Welsh Government statutory VAWDASV commissioning guidance.

COVID-19 has brought into sharp focus the sector's inability to cope with sudden change in need, with the current funding structure, and the long-term effects this will have on service provision. Specialist services made huge efforts to ensure the support was available to survivors when they needed it, but short-term funding cycles, non-flexibility in grants and trouble with emergency funding reaching the



front line⁴ meant this support came at a human cost. Our members and their staff continue to work tirelessly as the response to the pandemic continues to develop, and they consistently report staff burn out and vicarious trauma. The year on year funding cycles and short-term emergency funding exacerbates this through limited job security and ability to retain trained, expert staff within the sector. This has knock on impact on service deliver, leaving gaps in provision due to regular gaps in recruitment, increasing waiting lists and limiting levels of support.

“Well...there is only me on 14 hrs, this is my third week in the job...and there has been no one in place since April, so there is this large waiting list ”
(Children and young people worker)

2. How do you think Welsh Government priorities for 2021-22 should change to respond to COVID-19?

The COVID-19 pandemic has magnified current existing gaps in policy, planning and provision relating to Violence Against Women, Domestic Abuse, and Sexual Violence (VAWDASV). These are unprecedented times for all, the VAWDASV sector are working extremely hard to maintain their provision as an essential service during and following the COVID-19 pandemic. A shadow pandemic has been declared by the United Nations in light of the increases globally of VAWDASV during COVID 19.⁵ Evidence has shown that violence against women tends to increase during every type of emergency, including epidemics.⁶ The pandemic has exacerbated already existing inequalities. Older women and women with disabilities are likely to have additional risks and needs.⁷ Imkaan has reported

⁴ <https://www.welshwomensaid.org.uk/2020/04/welsh-womens-aid-stresses-urgent-need-for-funding-for-support-services-due-to-covid-19/>

⁵ <https://www.unwomen.org/en/news/stories/2020/4/statement-ed-phumzile-violence-against-women-during-pandemic>

⁶ <https://www.cgdev.org/sites/default/files/pandemics-and-vawg-april2.pdf>

⁷ <https://apps.who.int/iris/bitstream/handle/10665/331699/WHO-SRH-20.04-eng.pdf?ua=1>



that services led 'by and for' black and minoritised women have reported significant increases in demand – particularly for refuge spaces.⁸

The pandemic has drastically changed the demand on specialist services, and the lack of sustainable funding, particularly in the first instance, drastically reduced service's ability to respond flexibly to the change in need.

- 100% of specialist services reported that they had experienced additional costs due to the COVID-19 pandemic.
- 41% stated in June 2020 that they had lost funding due to the pandemic. This was noted to be due to the cancellation of fundraising events and loss of housing benefit due to adhering to social distancing and cleaning requirements in refuges increasing the "void" levels.
- Specialist services raised significant concerns of the sustainability of the resources which have been made available in response to the pandemic emergency and the lack of planning for long-term effects.

Violence Against Women, Domestic Abuse and Sexual Violence is a Welsh Government priority. Welsh Women's Aid call for this priority to be re-centred and at the forefront of policy and decision making across portfolios including health, housing, education and the economy.

COVID-19 has led to significant changes to demand:

- Complexity of cases reported to the helpline significantly increased. This led to the average call duration doubling since March 2020 and an 80% increase in crisis calls, whereby emergency services were required for the safety of the survivor.
- There was also a doubling in the number of referrals from the helpline to other agencies including a 47% increase in referrals to the police and 5 times the number of safeguarding referrals.
- 266 children and young people were supported through refuge-based support services during March to June 2020, however specialist services also reported drops in the number of children supported in the community as lockdown restrictions presented barriers to support. This will have long term impact on children and young people if they are not able to access the specialist support they need.
- Specialist services reported increases in demand as lockdown was lifted. Services, especially sexual violence services expect increases to happen over a long period as many survivors take 6 months or more to disclose or access support.

Welsh Government must ensure that VAWDASV specialist services are adequately resourced to meet known levels of current demand for support presented in every local authority area, as identified in needs assessments and by specialist services and commissioners working together. Emergency funding only goes up until March 2021, coupled with short-term year on year funding streams, many

⁸ Imkaan, The Impact of the Two Pandemics: VAWG and COVID-19 on Black and Minoritised Women and Girls, May 2020 https://829ef90d-0745-49b2-b404-cbea85f15fda.filesusr.com/ugd/2f475d_6d6dea40b8bd42c8a917ba58ceec5793.pdf

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specialist services are facing a cliff edge in funding post April 2021. Consideration should be given to establishing a national emergency fund to alleviate the crisis in funding shortfall for frontline services until a more robust model is developed.

There must be a renewed commitment to investing in the delivery of duties within the existing legislation across all directorates. The Violence Against Women, Domestic Abuse and Sexual Violence (Wales) 2015 Act has existed now for five years, and there are still areas where commitments are not closer to being reached. The COVID-19 pandemic has highlighted the lack of cross government strategic awareness and focus on the legislation's intended purpose to enable a cross-government, cross-department response to end VAWDASV and end the postcode lottery survivors face when seeking safety and support. We believe that until the purpose of the Act is achieved, consequences of the pandemic will continue to disproportionately effect survivors of VAWDASV.

Additionally, the national strategy ends in 2021, the new strategy must be ambitious, and include measurable actions cross-government aligned to adequate budget commitments to achieve these. Development of this should begin ahead of the current strategy coming to an end and will require commitment in the Welsh Government Budget for 2021-22, so there is not a significant gap between the two or dip in the investment needed to continue to work towards the prevention of VAWDASV and the protection and support of survivors, including children.

The Welsh Government must provide leadership to local authorities and health boards to ensure that these are delivered across all regions, in particular ensuring that the Statutory VAWDASV Commissioning Guidance is adhered to across all devolved funding streams at a national and local level. Feedback from specialist services notes that the guidance is not being adhered to across local authority commissioning practices. With specialist services being taken in house without effective consultation of survivors and counter to expert advice. With emergency COVID-19 grants, specialist services have fed back to Welsh Women's Aid that processes have been overly bureaucratic and have not reflected the principles of flexibility and swiftness that were so welcomed when set out by Welsh Government. We have raised this with Welsh Government however there seems to be limited leadership in holding local authorities to account in line with the statutory VAWDASV commissioning guidance.

A clear budgetary alignment to achieving the national strategy and deliver plan with re-instated governance structure to provide leadership and oversight, that is emulated across regions would assist in ensuring that there is greater progress in the aims of the VAWDASV (Wales) Act 2015 and allow for the legacy of what has been achieved through this strategy to be built on. Similarly, it would provide strength to hold to account regional bodies to their duties under the Act and effectively provide oversight to monitoring the implementation of a sustainable funding model and commissioning guidance.

3. How financially prepared is your organisation for the 2021-22 financial year, and how can the budget give you more certainty in planning and managing budgets given the ongoing volatility and uncertainty?

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A continued issue for VAWDASV specialist services is short term (one year) funding cycles. As we highlighted in our response to the committee in its call for evidence on the 2020-21 budget (and previous years) the VAWDASV sector continues to face uncertainty because of a lack of secure and sustainable funding. Specialist by and for BAME services, services for women with complex and multiple needs and sexual violence services remain particularly at risk. Little has changed since our State of the Sector 2018 report found sexual violence services faced the largest overall reduction in funding during the previous two financial years of 20.2%. This year's report calls for delivery on the commitment to developing a sustainable funding model for the sector. Sustainable should mean longer term funding (at least five year cycles), cross directorate budgetary commitment and high quality, collaborative commissioning practices.

In our previous response we highlighted the postcode lottery for children's workers, the lack of available support for survivors with no recourse to public funds, and the impact of Brexit. The preparedness of the sector for the coming year in terms of funding in regards to these issues has not improved, and these existing issues have been further magnified and exacerbated by the COVID-19 pandemic.

These remain priorities and areas which need to be urgently addressed by Welsh Government and reflected in its development of the 2021-22 budget.

Children and Young People:

Children and young people are being specifically impacted by the current climate which provides increased opportunity for perpetrators to monitor and control family members, increased opportunity for online sexual exploitation and results in more children and young people becoming "invisible" to services⁹.

We also welcome that emergency COVID funding for VAWDASV services included work with children and young people, but we call for the policy intent of the VAWDASV Act to be fully realised. This ground-breaking Act, together with the National VAWDASV Strategy and commissioning guidance, make clear that services to protect and support child survivors of VAWDASV must be available across every area of Wales. However, specialist VAWDASV services in Wales report that they are not receiving the funding needed to provide services for children and young people survivors of VAWDASV. Analysis showed that only 1 of the 7 local VAWDASV strategies describe the services they will provide to child survivors.

Children are now recognised as victims on the face of the Westminster Domestic Abuse Bill, Wales risks being overtaken and no longer being regarded as a pioneer nation in this vital work if the policy intent of the VAWDASV Act is not realised.

Migrant women:

Emergency COVID-19 funds enabled services to support survivors with No Recourse to Public Funds (NRPF). Services have raised concerns regarding women with NRPF following the pandemic and the

⁹ <https://www.welshwomensaid.org.uk/2020/03/supporting-children-and-young-people-through-the-coronavirus-pandemic/>





removal of access to emergency funds. Having supported the women during lockdown they will not be able to remove the support due to the risk she will have to return to her abuser or face destitution. If the women are to be supported in refuge, rent and support costs will need to be covered. If not covered by funders, services will be burdened with the cost, this will have a disproportionate impact on smaller organisations as the costs are not recovered. Allowing for the use of the grant to support NRPF clients is welcome but this needs to be recognised during non-pandemic times as it exposes the inequity in the provision of protection and support.

As part of our campaign for secure and sustainable funding for the specialist violence against women sector, we want to ensure this is accessible to all survivors across Wales, including those with no recourse to public funds and an insecure immigration status. We therefore recommend a national fund to be established to meet the needs of survivors (or for services to access) who have no recourse to public funds, to have equal access to protection, safety and support. Wales is a Nation of Sanctuary and all women must have equal access to protection, safety and support. This needs to include provision in refuge provision and support costs.

Impacts of Brexit:

The security of the specialist sector in Wales will also be under threat when the country is no longer part of the EU. The possible reduction in funds for Welsh communities due to leaving the EU is not only a concern for directly funding specialist VAWDASV services but also due to impact of the reduction of wider community services. If generic community services are cut there will be less opportunities for survivors to disclose, leading to escalation of abuse, later access to support and greater complexity of cases. This in turn will put additional burden on specialist services that are already struggling to meet need. COVID has evidenced this, with reductions in community and generic service access, specialist services, including the Live Fear Free Helpline experienced an increase in the complexity of cases.

We are concerned about the cumulative impact, of both COVID-19 and the effects of exiting the EU, on an already stretched sector. Sustainable funding for the specialist VAWDASV sector will be vital to ensuring *all* survivors can be supported. Welsh Government analysis shared with the sector suggests possible increases in the cost of living, including increased cost for food and energy. This will have impacts on services as well as survivors during and post abuse. Increased pressure on resources is likely to enable and/or intensify economic abuse. We are likely to see increased economic abuse due to resources being limited, enabling further control, reduced financial capacity for survivors to leave an abusive partner as well as impacting on their ability to move on and build a life free from abuse.

Services that have had no increase in funding to reflect a rise in costs or have lost other funding, could mean they will struggle to pay energy bills for their service properties. It will impact on staff as increased living costs on already low wages will leave them unable to maintain their current standard of living. This is likely to lead to a number of trained and experienced staff leaving the profession in order to obtain higher wages elsewhere. This is already a problem in the sector with the current lack of sustainable funding, the impact of further cost increases and cuts in funding and resources could be devastating to the retention of staff and the maintenance of current provision levels. This inevitably will have a knock-on impact on survivors as services will be limited in what they are able to provide,

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resulting in increased waiting lists and survivors being turned away from services due to lack of capacity or resources.

4. Given the ongoing uncertainty and rapidly changing funding environment do you think there should be changes to the budget and scrutiny processes to ensure sufficient transparency and Ministerial accountability?.

A large part of the necessity of a sustainable funding model is the current fragmentation of grants and funding streams which fund VAWDASV specialist support. Welsh Women's Aid would readily welcome additional transparency and accountability in this process.

It has been a year since the Wales Audit Office published its report¹⁰ evaluating the implementation of the VAWDASV (Wales) 2015 Act. Several of the recommendations focused on the governance and commissioning practices surrounding the funding of VAWDASV services. We would welcome clarity on what work has been done to meet these recommendations, and urge this practice to be considered when drafting the 2021-22 budget.

Additionally the VAWDASV National Strategy comes to an end in 2021, the refreshed strategy which will come to replace it will need to also include these considerations. As highlighted in a previous answer the future Welsh Government budget must take into consideration:

- A renewed commitment to achieving the purpose of the Violence Against Women Sexual Violence and Domestic Abuse (Wales) Act 2015 across government.
- A national strategy and delivery plan which includes cross-government action, developed, implemented, and monitored in partnership with survivors and the sector.
- Re-establishment of national governance structures to provide oversight of the delivery of the purpose of the Act and the National strategy and delivery plan.

As the Wales Audit Office identified, there remains great variability in the quality and levels of data collected and many authorities simply do not know what they deliver and how much they spend on responding to VAWDASV nor on its prevention. Feedback from our members highlights that local procurement procedures in according with local authority standing orders, contradict the best practice embedded in this statutory commissioning guidance

Based on this we recommend the Welsh Government ensure that the statutory VAWDASV commissioning guidance is mandatory for all commissioners, is applied across funding streams, and ensures commissioners for the Housing Support Grant and Children and Communities Grant understand the definition of specialist services and their role in maintaining a network of provision across Wales. We also recommend that the Welsh Government include distinct VAWDASV outcomes for each goal in the outcome's framework for the grant, in line with the outcome aim of a more equal Wales within the Future Generations Act. Lastly, we recommend the re-instatement of a national

¹⁰ https://www.audit.wales/system/files/publications/VAWDASV_eng.pdf



ministerial oversight board, which brings together representatives from across directorates, specialist services, strategic leaders from local authorities and health boards and criminal justice representatives to monitor and inform the delivery of the national strategy and budgetary commitments as well as monitoring the progress of the sustainable funding group. At present, the national expert stakeholder group, as chaired by the National Advisers has only met twice in two years. Greater strategic leadership and oversight is vital to see the aims of the 5year old ground-breaking VAWDASV legislation have an impact.

5. Does the Fiscal Framework adequately reflect the impact of the public health emergency in Wales compared to other UK countries and do you support increasing the annual and/or overall limits to current Welsh Government borrowing within this Framework.

As previously highlighted, for VAWDASV services to operate sustainably, we recommend a minimum of need of 5-year commissioning cycles, we would support any changes in the fiscal framework which would better support Welsh Government to allow these increased commissioning cycles.

Violence against women in itself is a public health emergency. We have seen a move to **recognise the VAWDASV as a public health pandemic** during COVID-19 in Wales and this prioritisation must not be lost post COVID-19. The World Health Organisation has produced briefings on VAWG and COVID-19, with evidence based on global information and previous pandemic research, available [here](#).

6. The Committee would like to focus on a number of specific areas in the scrutiny of the budget, do you have any specific comments on any of the areas identified below, particularly in light of the COVID-19 situation and how these should be reflected in the 2021-22 budget?

Welsh Government policies to reduce poverty and gender inequality.

All forms of VAWDASV are rooted in and are expressions of unequal gender relations in society; these reinforce and intersect with sexism, racism, homophobia and other forms of discrimination. The violence, abuse and disadvantage faced by women intersects with factors such as ethnicity, age, class, sexuality and disability, meaning these women experience these atrocities in a different, often more severe way. In a recent position statement Imkaan cite research by Cambridge University which shows that women have been hardest hit by job loss during COVID-19 and are more likely to be working in industries where it is not possible to work from home e.g. hospitality, cleaning and caring.¹¹ There are also significant concerns about the safety of undocumented migrant women who are more likely to face destitution.

80% of people employed in human health and social work activities in Wales are women.¹² There is further over-representation of Black, Asian or minoritized women filling these roles and frontline keyworker roles in supermarkets and cleaning services across the UK. There is an obvious increased

¹¹ <https://www.imkaan.org.uk/covid19-position-paper>

¹² <https://wenwales.org.uk/wp-content/uploads/2020/04/Feminist-Scorecard-Report-2020-Eng.pdf>



risk to the health and wellbeing of themselves and their family. Though no one is immune to COVID-19, structural inequality reproduces disproportionately across diverse communities and exacerbates existing racialised inequalities. For women and girls with protected characteristics, the two pandemics increase the risks at multiple interlocking levels.¹³

A report from Welsh Women's Aid and Disability Wales found that disabled women are more likely to be in poverty as well as being much more likely to experience both sexual and domestic abuse.¹⁴ Poorer households and renters are particularly vulnerable to a loss of regular income caused by the COVID-19 pandemic,¹⁵ meaning this a threat that will have a significant impact on disabled women.

In the Welsh Women's Aid report [Cheques and Balances](#), we highlighted that Women's poverty keeps them trapped in abusive relationships whilst delays in benefits, cuts to welfare grants, cuts to legal aid and specialist VAWDASV services makes it impossible for them to leave abusive situations and rebuild their lives.¹⁶ These issues can only be further magnified by COVID-19 and social-distancing.

Approach to preventative spending and how is this represented in resource allocations (Preventative spending = spending which focuses on preventing problems and eases future demand on services by intervening early)

In Wales we have ambitious legislation in the VAWDASV (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015 that means our public bodies can be ambitious in prioritising the prevention of VAWDASV. This includes investing in public health campaigns that challenge and change attitudes, high-quality relationships and sexuality education for all children and young people, and community engagement programmes that increase communities' knowledge and confidence to enable them to address the root causes such as gender inequality and intersecting discrimination.

Across Wales, the limited and unsustainable resourcing of VAWDASV means investment in prevention, particularly through statutory funds, has to be concentrated on tertiary prevention measures – that is, service response after the abuse has occurred and been reported. We know that these responses are crucial in terms of slowing the progression of and reducing the harm already caused by violence, as well as preventing its recurrence and supporting the process of recovery and the empowerment of survivors, including children and young people. However, intervening after violence has occurred comes at an immense cost, both human and economic.

¹³ https://829ef90d-0745-49b2-b404-cbea85f15fda.filesusr.com/ugd/2f475d_2c6797da42c6454f933837a7290ffe21.pdf

¹⁴ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/04/WWA-and-Disability-Wales-2019-report-Final-ENG.pdf>

¹⁵ <https://www.bevanfoundation.org/commentary/which-welsh-households-are-most-vulnerable-to-a-loss-of-income-because-of-covid-19/>

¹⁶ <https://www.welshwomensaid.org.uk/wp-content/uploads/2019/12/WWA-Cheques-and-Balances-Economics-of-Abuse-Report.pdf>



Currently however, funding for many primary prevention initiatives are ‘add-ons’ – they are implemented if and when resources ‘become available’.¹⁷

Public bodies as well as specialist sector organisations consistently cite a lack of capacity and resources as barriers to implementing primary prevention interventions. Due to the lack of funding available – “no designated money for prevention”¹⁸ – public bodies as well as VAWDASV specialist services are put in an impossible position where they feel that funding prevention would have to come at the expense of improving (or even just maintaining) current provision for survivors. Specialist services should not have to contemplate cutting survivor services in order to facilitate prevention work – especially as effective primary prevention is likely, to increase the number of people accessing support.¹⁹ There must be a paradigm shift in the conception of primary prevention – from an optional ‘add-on’ to an integral part of our response to VAWDASV. Without it, women and girls will continue to experience epidemic levels of violence and abuse throughout their lifetimes and will not be able to realise their human right to live free from abuse.

Sustainability of public services, innovation and service transformation

Our State of the Sector 2020 report, Time to Act on Sustainability demonstrates a step by step approach to funding a sustainable Violence Against Women, Domestic Abuse and Sexual Violence sector.

I have included the report for the committee’s consideration.

[ENG]: <https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/State-of-the-sector-2020-PDFdesign.pdf>

[CYM]: https://www.welshwomensaid.org.uk/wp-content/uploads/2020/11/CYM_State-of-the-sector-2020-PDFdesign-1.pdf

We aim to continue work with Welsh Government on further develop and implement a model for sustainable funding and offer an invitation to work in partnership, offering the expertise of ourselves as the National Umbrella body, our members, and the survivors they support on any aspect of this development.

How evidence is driving Welsh Government priority setting and budget allocations

¹⁷ Wales Audit Office (2019) ‘Progress in implementing the Violence Against Women, Domestic Abuse and Sexual Violence Act’; https://www.audit.wales/system/files/publications/VAWDASV_eng.pdf [accessed 24.02.2020].

¹⁸ Wales Audit Office (2019) ‘Progress in implementing the Violence Against Women, Domestic Abuse and Sexual Violence Act’; https://www.audit.wales/system/files/publications/VAWDASV_eng.pdf [accessed 24.02.2020]

¹⁹ See, for example, projections for primary prevention outcomes over short, medium and long term by Victoria State Government (2019) ‘FREE FROM VIOLENCE: Victoria’s strategy to prevent family violence and all forms of violence against women; First Action Plan 2018-2021: Annual Report Year One 2018-19’



What are the key opportunities for Government investment to support 'building back better' (i.e. supporting an economy and public services that better deliver against the well-being goals in the Well-being of Future Generations Act)

Throughout the pandemic VAWDASV specialist services have been making concentrated efforts to both support survivors and raise awareness that support is available. New ways of working have been developed by the sector out of necessity to mitigate damage and stretch limited resources. Practices such as moving from physical to phone and online support where possible, managing a reduced workforce, social-distancing in refuge, and remote contact with children and young people have been adopted.²⁰ In July 2020, Welsh Women's Aid held a [Creating Change that Lasts: Responding to VAWDASV following the COVID-19 Pandemic Roundtable](#) that brought together stakeholders from public health, national and local government, health sector, criminal justice, academia and specialist services to outline how we can build back better. We provided the feedback from this roundtable to Welsh Government and the Future Wales consultation.

We want to take this opportunity to acknowledge the incredible effort our members and the wider specialist support sector has made in protecting the safety of survivors, but also stress that these 'new' methods cannot be sustained long-term. Sustainability and availability of provision to protect and support all survivors of VAWDASV should be a key priority for building back better.

²⁰ <https://www.welshwomensaid.org.uk/2020/03/responding-to-violence-against-women-domestic-abuse-and-sexual-violence-during-the-covid-19-pandemic/>