

Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) ar [Atal trais ar sail rhywedd drwy ddulliau iechyd y cyhoedd](#)

This response was submitted to the [Equality and Social Justice Committee](#) consultation on [The public health approach to preventing gender-based violence](#)

PGBV 02

Ymateb gan: NSPCC Cymru | Response from: NSPCC Wales



NSPCC Cymru response to the Equality and Social Justice Committee inquiry on the public health approach to preventing gender-based violence

It is essential to consider the needs of children and young people as part of an effective public health approach to ending gender-based violence. Mandatory RSE, and the forthcoming action plan on peer-on-peer sexual harassment are welcome, important steps to embed prevention and early intervention. The Welsh Government VAWDASV children and young people sub-group, as part of the blueprint approach to tackle gender-based violence, is an important forum to discuss much-needed support for children and young people who experience domestic abuse and sexual violence. Following these developments, NSPCC Cymru is feeling more hopeful that Welsh Government have now put in place the building blocks for a prevention focused, public health approach to ending gender-based violence in Wales. But questions remain about turning policy intent into practice on the ground.

Our response asks the inquiry to consider:

- **How has the public sector (local authority and local health boards) delivered on its duties within the VAWDASV Act so far? What further support does the sector need from Welsh Government, to deliver against these duties in the future?**
- **How has Welsh Government engaged with, involved and co-ordinated input from all relevant directorates to end gender-based violence?**
- **How is Welsh Government measuring progress achieved against the VAWDASV strategy? Where does overall accountability lie within Welsh Government for ending gender-based violence?**

Inquiry questions

1. **What works in preventing gender-based violence before it occurs (primary prevention) and intervening earlier to stop violence from escalating (secondary prevention)?**

Whole School Approach to RSE

NSPCC Cymru is concerned about the implementation of RSE in Wales and have been calling for better training and support for teachers and schools. High quality RSE, delivered through a whole school approach plays a vital role in working to prevent gender-based violence and safeguard children and young people. Age and developmentally appropriate RSE is vital for helping children recognise healthy and unhealthy behaviour, reflect on their own experiences and attitudes, and contribute to a positive school culture. NSPCC sees educative programmes as an opportunity to make sure that all young people know that they have a right to be treated, and responsibility to treat others, with dignity and respect.

We have been calling for a funded national programme of professional learning on RSE for all school staff, as well as a dedicated and specialist trained RSE lead practitioner for all primary and secondary schools and a RSE advisor at local authority level. Appropriate training for school staff is vital to ensure that they have the confidence and skills to deliver quality age and developmentally appropriate RSE content to young people. Training should ensure staff have the tools to spot the signs and symptoms of trauma and abuse and be confident to support the child through their disclosure journey. The importance of training for school staff came

out as a key theme for young people leading a cross-party group event on preventing child sexual abuse in Autumn 2022¹.

We are calling on Welsh Government to develop a detailed cross-curricular whole school approach to RSE guidance. Currently, we are concerned the RSE Code does not contain enough information for schools on how to implement a whole school approach to RSE. A whole school approach will enable entire schools and communities to have a shared understanding of their responsibilities to create a safe and healthy environment for children, and to be able to recognise and respond to signs of concerning behaviour or disclosures of abuse and neglect. Such an approach would demonstrate *how* schools can engage with parents, communities and young people to develop inclusive, relevant and rights-respecting relationships and sexuality education that safeguards children.

There is also a need to ensure that young people are consulted on what they want from RSE, to make sure it stays relevant to the diversity and complexity of their changing lives. Research suggests that there is a significant gap between young people's lived experiences and the relationship and sexuality education that they receive², with many being dissatisfied with the quality, inclusivity and relevance of the RSE that is being provided³. We would like to see a commitment from Welsh Government to work with young people when reviewing and developing the RSE curriculum and relevant action plans.

Our Ask

NSPCC Cymru welcomes the decision by Welsh Government for RSE to be mandatory, but questions remain about how schools will be resourced, and staff supported to deliver effectively. We ask that the inquiry:

- **Scrutinise Welsh Government plans for professional learning on RSE, outlining what training and support is currently being provided for schools.**
- **Launch a short inquiry to explore how confident primary and secondary teachers feel about designing and delivering RSE, and what training is needed to better support them.**
- **Establishes whether all primary and secondary schools and local authorities do now have a designated RSE lead in place, and if not, where the gaps are.**
- **Recommend that Welsh Government develop a detailed cross-curricular whole school approach to RSE guidance.**
- **Seeks clarification from Welsh Government on their plans to regularly review the RSE curriculum and how they are going to embed the voices of children and young people in RSE to achieve a curriculum that remains relevant.**

Coordinated Community Response

¹ Time for Action briefing from the CPG on preventing child sexual abuse attached as addendum

² Hollis, V. et al (2022) [Children and young people's views on learning about relationships, sex, and sexuality: a narrative review of UK literature](#). London: NSPCC; Renold, E. et al (2023) ["We have to educate ourselves": how young people are learning about relationships, sex and sexuality](#). London: NSPCC

³ See Hollis, V. et al (2022) [Children and young people's views on learning about relationships, sex, and sexuality: a narrative review of UK literature](#). London: NSPCC;; Sex Education Forum (2022) [Relationships and Sex Education: The Evidence](#); Renold, E. and McGeeney (2017) [The Future of the Sex and Relationships Education Curriculum in Wales](#). Welsh Government; Renold, E. and McGeeney, E. (2017) [Informing the Future Sex and Relationships Education Curriculum in Wales](#). Cardiff University

While schools play a pivotal role in promoting a preventative approach to gender-based violence, we also need to consider the wider community and its role in prevention. The [coordinated community response](#) (CCR) is an evidenced approach which brings services together to ensure local systems keep people safe, hold perpetrators to account and prevents abuse. NSPCC Cymru worked with Welsh Women's Aid to develop a service model for children and young people VAWDASV services in each region of Wales. Our approach considers the essential elements needed for prevention including:

- Bystander Interventions - Development and delivery of training and community interventions using an approach which provides young 'bystanders' with the skills and confidence to challenge attitudes that drive VAWDASV and provide effective signposting to specialist services.
- Community Interventions – A 'one size fits all' approach to VAWDASV does not work. We need targeted community interventions to address all forms of VAWDASV in ways that are accessible and meaningful to different communities. This includes 'by and for' interventions for communities where FGM, Forced Marriage, and/or so-called 'honour-based' abuse are practiced.

Contextual safeguarding approach

A focus on the spaces and places children and young people occupy can prevent harms escalating. A contextual safeguarding approach, which ensures local business owners such as shops, takeaways, cafes, school coach drivers and park wardens recognise their role in supporting and safeguarding young people can ensure the community as a whole knows the signs of abuse and what to do about it.

This work should go hand in hand with harmful behaviour interventions. Young people who demonstrate harmful behaviours towards peers, children or adults, need appropriate interventions including steps to address the behaviour early to reduce further harm and to enable a change of course for the child exhibiting the harmful behaviour.

Our Ask

We ask that the inquiry consider what is needed to up skill communities and empower them to be confident about spotting signs of abuse and taking action.

2. **How effective is a public health approach to preventing gender-based violence and what more needs to be done to address the needs of different groups of women, including LGBT+, ethnic minorities, young and older people at risk of violence at home and in public spaces.**

Any public health approach must have a clear understanding of children's access needs to any/all services. This approach must recognise that a child's age and identity can intersect with lived experiences of abuse or previous involvement with statutory services, thus creating multiple potential barriers to accessing support.

An effective public health approach requires three types of prevention interventions:

1. Primary prevention, which aims to stop violence before it occurs. This can be done either through changing attitudes and behaviour or through an attempt at reforming structures and

practices in relationships, communities and society by challenging attitudes which condone or reinforce gender-based violence.

2. Secondary prevention or early intervention is targeted at individuals and groups who display signs of using harmful behaviour or experiencing abuse. A good example of secondary prevention may be training for those in public-facing roles on the signs of abuse and routes to support.
3. Tertiary prevention is support and protection once abuse has occurred. The aim is to stop the abuse continuing and provide support, so abuse doesn't shape the child's future. It can also be used with young people displaying harmful behaviours.

Coordinated working between agencies is the only way to effectively tackle VAWDASV and we know this does not happen when they act in silos. As stated, we are pleased to have a subgroup facilitated by Welsh Government, which specifically considers the needs of children and young people. However, there needs to be further joining up of different strands of work and we would like to see a Children's Minister post created within Welsh Government to ensure overall accountability.

Our Ask

We ask the inquiry to consider the barriers which remain to achieving effective prevention in all three areas, including:

- **The role of RSE and a whole school approach in primary prevention**
- **Training for the public sector on the indicators of abuse and how to support a disclosure in secondary prevention**
- **Sustainable commissioning of the specialist VAWDASV sector in tertiary prevention**

We also ask the inquiry to consider the need for a children's minister.

3. **What is the role of the public sector and specialist services (including the police, schools, the NHS, the third sector and other organisations that women and girls turn to for support) in identifying, tackling and preventing violence against women, and their role in supporting victims and survivors?**

The importance of the coordinated community response to gain a whole picture of risk is essential here and brings together all the agencies who may come into contact with survivors. We know public sector services in particular are often the first point of contact for survivors. Training, via Ask and Act is welcome and essential, but this must include mandatory training on the impact and signs of VAWDASV on children and young people.

It is also essential that Welsh Government ensure funding for vital support services for children and young people. In the cross-party group on preventing child sexual abuse legacy report into the first Welsh Government action plan, it is noted that a welcomed increase in training has led to more referrals. The report shows that *'RASASC North Wales has seen its children and young people's waiting lists double in the last financial year (2021/22) in comparison to the previous year, and data for the latest quarter at the time of writing (Q2 2022/23) suggests that further increases are expected for this financial year'*. An effective

public health approach must be backed-up by sustainable commissioning of the specialist third sector services, to avoid further harm to children by too long waiting lists. The VAWDASV Sustainable Funding group, which met between 2016-2021 - aimed to secure sustainable funding for VAWDASV services but we are yet to see this realised.

The forthcoming UK Government Victims' Bill will also have implications for both victims and services in Wales, which will need to be fully considered.

Our Ask

We ask the inquiry to probe how Welsh Government will:

- **Ensure young victims needs are met across Wales**
- **Ensure coordinated working across services to meet the needs of all children and young people**
- **Ensure sustainable funding to provide specialist children's domestic abuse services, including provision for young people experiencing abuse in their own intimate relationships**



Time for Action: young person and lived experience led event from the cross-party group on preventing child sexual abuse

Briefing and recommendations

Introduction

In September 2022, the cross-party group on child sexual abuse held a young person and survivor led event on the intersection between online harms and peer-on-peer sexual abuse. The event was in response to Estyn's report from December 2021 'We don't tell our teachers' about peer-on-peer sexual harassment in Welsh secondary schools. In that report, young people told us the harassment and abuse they experience online and offline is interchangeable, which is why the event focused on that intersection of harm.

The event was an opportunity to present solutions and recommendations to Welsh Government as it finalises its action plan on peer-on-peer sexual harassment. Representatives from the National UK Youth Parliament presented youth-led solutions to online harms and peer-on-peer sexual abuse and facilitated breakout rooms to consider how the tech industry, education, politicians, and parents/carers can better respond to these issues and support young people affected. In addition, experts by experience from the Dragon Shield project at Swansea University held a discussion, chaired by the Marie Collins Foundation on mainstreaming lived experience voices.

While this briefing details the various recommendations to come from the event, our overarching call to Welsh Government is that the voice of survivors of child sexual abuse and young people themselves must be at the core of designing the response to peer-on-peer sexual harassment and the forthcoming Welsh Government action plan. In particular, the Cross-Party Group strongly supports recommendation two from the Children, Young People and Education (CYPE) Committee Inquiry 'Everybody's affected – peer on peer sexual harassment among learners' that '*the Welsh Government must create a Young Person's Advisory Board...to co-design the Welsh Government's response to peer-on-peer sexual harassment*'. We are pleased Welsh Government have accepted this recommendation as well as committing to establishing a young person's advisory panel for digital resilience.

Key recommendations

Participants split into four breakout rooms and were asked to consider '*what solutions can we come up with to address online and peer-on-peer sexual harassment.*' A number of themes emerged from the recommendations put forward in these sessions (detailed below). From those themes, the secretariat has identified six key recommendations, which we feel reflects the varied discussions and solutions.

- There must be mandatory co-operative working across Government departments and the public sector, in collaboration with specialist services to create local strategies to tackle the issues of online and peer-on-peer sexual abuse. This work could be overseen by the children and young people subgroup as part of the new national VAWDASV blueprint strategy. These strategies must speak to, and complement, the work of the Regional Safeguarding Boards and must be co-developed with young people and experts by experience.
- Welsh Government should commit to hearing the voices of lived experience groups when developing its action plan on peer-on-peer sexual abuse and its work on online CSA. This must be done in a trauma informed way, which does not cause further harm and is accessible and inclusive of all needs. Mechanisms must also be in place to ensure there is constant feedback from policy makers to lived experience groups and there is fair remuneration for the time and work.
- All school staff should have training on the intersection between peer-on-peer sexual abuse and online harms. This should include sessions, designed by young people, about the impact of social media on their peer group. We were pleased Welsh Government accepted recommendation 14 in the CYPE committee report that



government should work with experts and the young people advisory board to *'gather and collate examples of sex and relationships education that learners consider to be effective in addressing peer on peer sexual harassment'*. However, we want to see this go further and include the design of sessions by young people, as mentioned above.

- Schools play a key role in their local communities and are a source of support to their families. They should be supported to provide practical strategies for concerned families to help them address peer-on-peer sexual abuse and online harms. These strategies should be co-developed with young people.
- Online harms should be treated as seriously as any other type of harm and children should enjoy parity of protection in their online and offline spaces. Both schools and the tech companies must ensure the voices of young people and lived experience groups are heard and acted on. It is vital we see the Online Harms Bill pass through the UK Parliament as soon as possible, but it must ensure the safety of children remains front and centre of the legislation. Welsh Government should support our call to ensure a robust Act which works for children.
- Data from the School Health Research Network (SHRN) should be used to track the impact of online harms on young people in Wales. Young people should support with drafting questions to be included in the SHRN which in turn will be fed into schools. Done on a regular basis, and disaggregated to Wales, this will provide a clear picture of the impact of harm on young people. We are pleased Welsh Government has accepted the CYPE Committee recommendation five that data is collected on sexual harassment in schools. However, this should be expanded to incorporate online harms as well.

Recommendations by theme

Training for schools

- Ensure teachers are supported so that they can confidently deliver the curriculum. In order to achieve high quality RSE, school staff need to be well-trained, supported and confident to deliver. Training should ensure staff have the tools to spot the signs and symptoms of trauma and abuse and are confident to support the child through their disclosure journey.
- Welsh Government should frequently review the RSE curriculum to ensure it remains aligned with emerging trends and threats to young people. This can be achieved by working collaboratively with young people and developing peer-led training with lived experience groups. Frequent, collaborative reviews can ensure the curriculum remains relevant, and that the content is inclusive, is conscious of, sensitive and adapts to the changing experiences and needs of young people.
- Young people told us 'We can't stress enough how important it is to talk about peer-on-peer abuse'. We therefore welcome the focus on increasing children and young people's awareness of different kinds of harmful or abusive behaviour, including peer on peer harassment and bullying and the role technology can play in the new RSE Code. We are also pleased that Welsh Government has accepted recommendation 13, in the CYPE Committee inquiry, that funding should be ring-fenced for all school staff to undertake training. However, we would like to see more detail on the level of training expected within schools, in particular that the ringfencing will include ongoing professional development, to ensure a whole school approach to RSE is realised.
- Support and training should be made available for the local community around the school to spot the signs of peer-on-peer sexual abuse and ensure the community knows what to do. This should be informed by contextual safeguarding approaches, which ensures local business owners such as shops, takeaways, cafes, school coach drivers and park wardens recognise their role in supporting and safeguarding young people.

The importance of young people and lived experience voices to inform change



- It is essential the voices of lived experience groups and young people are fore fronted in decision making in relation to peer-on- peer sexual harassment. But work with these cohorts must be trauma informed. Key principles for a trauma informed approach should include:
 - A child centred approach in engagement work, whereby the child’s wishes are considered at every stage of the engagement process
 - An understanding that 1 in 5 children have experienced childhood trauma, all engagement work, not just work with lived experience groups, must be conscious there are experiences of trauma in the room
 - A trauma informed approach must also be intersectional, recognising that different cohorts of the Welsh population will have different responses to their own trauma
 - All participation work must consider how to handle disclosures of abuse and ensure a safeguarding protocol is developed
- School policies concerned with behaviour and safeguarding should have young person involvement throughout the process of developing them and implementing them. There must also be half-termly engagement with young people, via school councils and school Senedd, on these policies to ensure they adapt to emerging risks with built in mechanisms to review, ensuring they work for young people.
- Lived experience and young person engagement with policy development must be mainstreamed and planned into consultation work from the start of policy development.
- All engagement with lived experience groups must ensure no further harm is done to survivors, that participation is properly reimbursed and that opportunities for involvement are truly inclusive and consider varying needs, caring responsibilities, and geography etc

Support for parents/carers with tech and online harms

We welcome Welsh Government accepting recommendation 18 from the CYPE Committee inquiry report that awareness campaigns are carried out to support families on responding to peer-on-peer sexual harassment. In particular, we are pleased that the recommendation includes an understanding of the risks of accessing inappropriate content online.

- Online harms are dynamic and ever changing, it is essential parents/carers feel empowered to access information about online risks and know how to support their child if they have concerns. A misinformed or dismissive response could mean that the child does not ask or disclose again. We echo [IICSA’s recommendation](#) from its final report that Welsh Government commission regular awareness campaigns and suggest parents/carers should be informed about the National Online Safety parent training portal via a national awareness campaign.
- Linked to the above recommendation, there should be a rolling programme of support for families which addresses peer-on-peer sexual abuse and online harms. This programme should be publicised via a national campaign, with support at a local level to implement. These should be co-produced by young people and available online and in physical spaces and include:
 - Links to websites to help keep parents/carers informed of types of abuse
 - Signs to look out for that their child may be experiencing abuse, including advice on how to support and where to turn to for help
 - Particular support should be provided to the parents/carers of young people using harmful behaviours.

Awareness campaigns



Awareness campaigns on the harms and intersection of online and peer-on-peer sexual abuse should be co-developed with young people and lived experience groups. We are pleased that Welsh Government have committed to this, following recommendations in the CYPE Committee report. We are also pleased that WG have accepted recommendation 11 that schools and colleges create a culture where sexual harassment is unacceptable, and reports are taken seriously.

Young people at the event felt the following messages were important in awareness raising campaigns:

- 'Anyone can be a perpetrator of abuse, from strangers to the people we trust the most'
- Challenge victim blaming, ensure examples are included of what this can look like
- Call out misogyny, explain it is on a continuum of harm from so called 'minor' incidents to abuse.
- Include repeated messaging to lead to social change
- Challenge the 'normalisation' in schools – messages such as 'take no notice' 'boys will be boys' and challenge harmful comments
- Highlight the reasons why a young person may not report straight away, such as feeling it is 'too minor' or 'I won't be believed'.

Signposting, support, and online moderation

- There should be clear pathways to support for online harms as well as effective systems for children and young people to report harm. This should include mandatory support from apps when young people experience online harms.
- Harm caused in the online space should be treated equally to harm experienced in offline spaces with online safeguarding responses treated with the same seriousness as any other safeguarding concern.
- Welsh Government's digital resilience plan should ensure practice is developed in response to online harms and that inconsistencies in school responses to online abuse is addressed.
- Children in year six of primary school should have support in safe mobile phone use as they transition to year seven, recognising that many 11-year-olds are given their first phone as they start secondary school. The Minister has committed to a review of mobile phone use in the 'Behaviour management in the classroom' guidance from 2012. This is an opportunity to include support for younger children as they enter secondary education.

Thank you to the UK Youth Parliament, supported by Children in Wales and the Lived Experience Expert Group from Dragon Shield for their time, support and commitment to the event.

For further information. Please contact [REDACTED]