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John Griffiths AM  
Chair of the Equalities, Local Government and Communities Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff

26 October 2016

Dear John

Thank you for giving NSPCC the opportunity to provide oral evidence to the Equalities, Local Government and Communities Committee in support of your post legislative inquiry into the implementation of the **VAWDASV Act**.

This letter is the additional information about FGM and the Voices over Silence project that we agreed to provide to the Committee.

### **VAWDASV Strategy and FGM**

FGM is both child abuse and sexual violence. However **FGM is broadly missing from the draft strategy**. It is only mentioned on page 9 as a stat and page 19 in prevention. We would recommend that FGM is included in more detail in each of the sections in the final national strategy and include the following:

- **How it interfaces with the UK 'Ending Violence against Women and Girls Strategy 2016-20'**. This Home Office strategy has included the **clear outcome of 'reduction in the prevalence of FGM in line with our aim to end FGM within a generation'**. **We would recommend that the same outcome should be included in the final Welsh national strategy** together with clear commitments/ actions that Welsh Government will take that link to and complement the UK government actions.
- **Detail the commitments and actions that WG will take towards the outcome of ending FGM. It should also highlight the work and membership of the Wales Strategic HBV Leadership Group and how the strategy will be supported by the SLG and how the work of the SLG will contribute to the outcome.** The work already undertaken in Wales on FGM is the envy of other UK administrations and there is no mention about what has been achieved in Wales in recent years. **We feel that the final strategy should signpost and reference this work and that the national delivery plan should include clear reference to the existing Wales Strategic Leadership Group Delivery plan** (please contact [KimAnn.Williamson@cps.gsi.gov.uk](mailto:KimAnn.Williamson@cps.gsi.gov.uk) for a copy of the latest Delivery plan and more information).
- **The actions need to include the role that health will play** in preventing and treating those who have experienced FGM also should be included in the national strategy. There is no mention of the new care pathway that has been adopted or a commitment to continue it. There is also no mention of work towards an all Wales clinical service, nor any commitment to continuing to progress this area. As a children's charity

we feel it is vital that health services, in particular, understand the specific needs of children and ensure specialist services are available. A child who has experienced FGM will have needs for mental health support and this needs to be recognised and linked to the Together for Mental Health Strategy.

- We are concerned that the current strategy, by the fact that FGM is largely absent, does not promote clarity about the responsibility and expectations with regards to service provision at a local level to prevent, protect and support survivors of FGM or children who may be at risk of undergoing the process. This is especially concerning given new duties included in the Serious Crime Act 2015 that need to be implemented in Wales. We believe there needs to be clearer information (perhaps in the form of a table/annex) outlining who has responsibility for what. It would be helpful for the strategy to establish a set of minimum standards for provision on FGM in Wales. We believe the National Strategy should form a framework to help provide more clarity to underpin the development of local strategies, highlighting exactly what duties and expectations are with regards eradicating FGM. This apply to all relevant authorities covered in by Act

### **The Voices over Silence project**

NSPCC Cymru/ Wales was funded by Welsh Government to work in partnership with Bawso to develop a youth participation project to empower young people to become change-makers on harmful practices such as FGM. The aim of the project was to develop campaign materials to both raise awareness of FGM and promote the free NSPCC FGM helpline that can be contacted if anybody has a concern about FGM. The project trained and upskilled 16 young people to become FGM ambassadors and the campaign materials that aim to spark conversations and promote 'Voices over Silence' on the subject of FGM were launched on International Women's Day in March 2016. The campaign materials are available on the Live Fear Free website (<http://livefearfree.gov.wales/campaigns/?lang=en>). **In order to ensure their roll out in schools across Wales we had been informed that these materials would be incorporated into the Welsh Government Spectrwm provision in schools on FGM. We are aware new FGM provision was in the process of being developed over the summer. We would be keen to receive an update on progress towards this commitment as well as an update on any other ways the Welsh Government will continue to promote these materials.**

I hope this additional information makes clear our policy positions and expectations of the national strategy in relation to FGM. Should anything be unclear please do not hesitate to contact me.

Yours sincerely



Vivienne Laing  
Policy and Public Affairs Manager  
NSPCC Cymru/ Wales

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**EVERY CHILDHOOD IS WORTH FIGHTING FOR**

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