

**Explanatory Memorandum to Statutory Guidance under Section 15 of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.**

This Explanatory Memorandum has been prepared by *Education and Public Services* and is laid before the National Assembly for Wales in conjunction with the above subordinate legislation and in accordance with Standing Order 27.1 and 27.14

**Minister/Deputy Minister's Declaration**

In my view, this Explanatory Memorandum gives a fair and reasonable view of the expected impact of the *Violence against Women, Domestic Abuse and Sexual Violence (VAWDASV) Commissioning Guidance* under the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. I am satisfied the benefits justify the likely costs.

Jane Hutt AM  
Deputy Minister and Chief Whip  
21 February 2019

## **PART 1**

### **1. Description**

This Statutory Commissioning guidance applies to the commissioning of Violence against Women, Domestic Abuse and Sexual Violence (VAWDASV) and related services which provide other support to victims of VAWDASV by relevant authorities under the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (“the Act”). Relevant authorities are defined as local authorities, local health boards, fire and rescue authorities and NHS Trusts, and the guidance is issued under section 15 of that Act (‘power to issue statutory guidance’).

### **2. Matters of special interest to the Constitutional and Legislative Affairs Committee none**

None.

### **3. Legislative background**

The Act received Royal Assent on 29 April 2015. The Act ensures a focus across the public sector on the prevention of VAWDASV, the protection of victims and the support for those affected by such issues.

Section 15 of the Act provides the Welsh Ministers with the power to issue guidance to relevant authorities on how they should exercise their functions with a view to contributing to the pursuit of the purpose of the Act. Section 16 of the Act requires the guidance to be laid before the Assembly in draft before being issued. Statutory guidance may address, amongst other things, the commissioning by relevant authorities of specialist advice or other assistance relating to gender-based violence, domestic abuse and sexual violence. The guidance follows the draft negative resolution procedure.

### **4. Purpose and intended effect of the guidance**

The aim of this guidance is to promote high quality collaborative commissioning that delivers more consistent and effective services to prevent gender based violence, domestic abuse and sexual violence and protect and support victims of VAWDASV across Wales. This guidance applies to the commissioning of both specialist and non-specialist VAWDASV services, whether commissioned from the public, third or private sectors.

This guidance sets out what is expected for the national, regional and local commissioning of evidence-based and integrated interventions by both specialist and non-specialist VAWDASV services to meet the purpose of the Act.

This document is therefore intended for use by:

- current and future service commissioners at national, regional and local levels;
- providers of services, statutory or non-statutory, specialist and non-specialist;
- all relevant authorities as set out in the Act, together with responsible authorities as defined by the Crime and Disorder Act 1998;
- those with an interest in providing funding for VAWDASV and related services within Wales.

In order to achieve a joined-up and collaborative approach, this guidance is intended to assist the commissioning of other related services (that is, services which provide alternative means of support and assistance to victims of VAWDASV) by commissioners from relevant authorities, Welsh and UK Government departments and the criminal justice system working to achieve the purposes of the Act. Examples include:

- delivery of nationally identified priority areas such as early years work, housing and homelessness,
- adult and child safeguarding and social care,
- mental and emotional health,
- substance misuse
- anti-poverty, skills and employability programmes;
- offender management and reducing reoffending;
- the delivery of 'freedom/flexibility' pilot areas to promote early intervention and prevention in local communities.

To the extent that it relates to such services, it is not issued under section 15 of the Act, given it does not directly relate to VAWDASV services, however, the Welsh Government consider that combining such guidance with the statutory VAWDASV guidance provides real benefits in ensuring such a joined-up and collaborative approach, meaning better overall delivery and quality of services.

## **5. Consultation**

The VAWDASV Sustainable Funding task and finish group assisted in the initial development of the draft guidance. The group was made up of representatives of a variety of stakeholder bodies from the third and public sector. Members of the group were encouraged to invite input from their stakeholders.

A consultation exercise on the draft guidance ran between 29 March 2018 and closed on 22 June 2018. In total, 29 responses were received.

A Key Themes Emerging document was published which outlined the Welsh Government's response to the consultation.

Link to the consultation, summary of responses and Key Themes Emerging document is provided below:

<https://beta.gov.wales/draft-guidance-commissioning-violence-against-women-domestic-abuse-and-sexual-violence-services>

## **6. Regulatory Impact Assessment (RIA)**

A Regulatory Impact Assessment has been prepared in accordance with Standing Order 26.6(vi) and is attached at Part 2.

## **PART 2**

### **REGULATORY IMPACT ASSESSMENT (RIA)**

The Regulatory Impact Assessment that was undertaken for the Violence against Women, Domestic Abuse and Sexual Violence Act outlined that the Welsh Government would undertake a public consultation, including a regulatory impact assessment, before issuing either non-statutory or statutory guidance.

This regulatory impact assessment is therefore structured around the following element of the Act:

- (1) Power to Issue Statutory Guidance and the Duty to Follow Such Guidance

#### **Section 1**

##### **Purpose: Issue Statutory Guidance for the Commissioning of VAWDASV Services in Wales and the Duty to Follow Such Guidance**

##### **Options**

###### **Option 1 – Do Nothing**

This option would mean the Welsh Government would not provide relevant authorities with any guidance regarding the commissioning of evidence-based and integrated interventions by both specialist and non-specialist VAWDASV services to meet the purpose of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 ('the Act').

There would be no opportunity for the Welsh Government to share best practice or promote consistent high quality service provision across Wales to ensure victims are receiving appropriate and effective services. Under this option it would be for relevant authorities<sup>1</sup> to determine individually how best to acquire services to prevent, protect and support victims of VAWDASV in Wales. This option does not ensure that the availability of support services is consistent throughout all areas in Wales and therefore does not ameliorate the availability of sporadic 'postcode lottery' service provision.

###### **Option 2 - Use non-statutory guidance to implement change**

This option involves the Welsh Government issuing non-statutory guidance to relevant authorities regarding the commissioning of evidence-based and integrated interventions by both specialist and non-specialist VAWDASV services to meet the purpose of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 ('the Act').

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<sup>1</sup> Local Authorities, Local Health Boards, Fire and Rescue Authorities and NHS Trusts

This option provides an opportunity for the Welsh Government to share best practice and promote consistent high quality service provision.

Under this option the guidance could, amongst other things, raise awareness and highlight the benefits of collaborative commissioning that will deliver more consistent and effective services to prevent VAWDASV and protect and support victims of VAWDASV across Wales. This can include:

- improving effectiveness in service design, procurement and contracting;
- improving population outcomes across the regions in Wales, and reduce the proportion of service users who experience negative outcomes from services;
- providing common streamlined commissioning arrangements that ensure integrated pathways of support to meet the needs of victims experiencing multiple disadvantages;
- achieving common approaches that encourage better use of data and analysis and promote more effective strategic decision making, resulting in more service users receiving appropriate and effective services;
- reducing duplication of commissioning activities;
- developing a more sustainable model of funding that achieves better value for money and boosts investment in service provision through pooling budgets, including relevant authority core budgets;
- affording service providers with greater certainty to enable enhanced flexibility and innovation in responding to service user needs;
- ensuring child and adult victims of VAWDASV receive services that fulfil their rights for protection and support;
- focusing funding to support direct service delivery rather than general co-ordination: this should become core business for local authorities as part of the forthcoming duty to deliver local strategies on VAWDASV;
- extending the reach of some services, and reduce duplication of others;
- promoting effective working relationships, trust and good communication between organisations;
- strengthening accountability and co-operation of local and regional partnerships through joint prioritisation, in particular in relation to the development of local strategies; and
- enhancing governance and improved strategic leadership through regional commissioning partnerships.

Under this option, relevant authorities would be encouraged to follow the guidance issued by the Welsh Government, but the guidance would not be enforceable. A relevant authority could therefore choose to ignore the guidance in its entirety.

### **Option 3 – Issue commissioning guidance as a statutory requirement for specified bodies to follow**

This option involves using the powers under the Act which allow the Welsh Ministers to issue guidance regarding the commissioning of evidence-based and integrated interventions by both specialist and non-specialist VAWDASV services to meet the purpose of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 ('the Act').

Under this option the guidance could, amongst other things, raise awareness and highlight the benefits of collaborative commissioning that will deliver more consistent and effective services to prevent VAWDASV and protect and support victims of VAWDASV across Wales. This can include:

- improving effectiveness in service design, procurement and contracting;
- improving population outcomes across the regions in Wales, and reduce the proportion of service users who experience negative outcomes from services;
- providing common streamlined commissioning arrangements that ensure integrated pathways of support to meet the needs of victims experiencing multiple disadvantages;
- achieving common approaches that encourage better use of data and analysis and promote more effective strategic decision making, resulting in more service users receiving appropriate and effective services;
- reducing duplication of commissioning activities;
- developing a more sustainable model of funding that achieves better value for money and boosts investment in service provision through pooling budgets, including relevant authority core budgets;
- affording service providers with greater certainty to enable enhanced flexibility and innovation in responding to service user needs;
- ensuring child and adult victims of VAWDASV receive services that fulfil their rights for protection and support;
- focusing funding to support direct service delivery rather than general co-ordination: this should become core business for local authorities as part of the forthcoming duty to deliver local strategies on VAWDASV;
- extending the reach of some services, and reduce duplication of others;
- promoting effective working relationships, trust and good communication between organisations;
- strengthening accountability and co-operation of local and regional partnerships through joint prioritisation, in particular in relation to the development of local strategies; and
- enhancing governance and improved strategic leadership through regional commissioning partnerships.

This option provides that the guidance issued by the Welsh Ministers under this power must be followed by the specified authorities. These authorities could depart from the guidance if they identified an alternative way of doing so. In such circumstances the authority would need to publish details of the alternative approach. If the Welsh Ministers were unconvinced the alternative approach would meet the purposes of the Act, the Welsh Ministers are empowered by the Act to issue a direction to require authorities to follow the guidance. Such guidance could require relevant authorities to implement best practice and assist in the promotion of consistency and high quality standards across Wales.

## **Section 2**

### **Costs and Benefits**

This section contains the cost benefit analysis of the options detailed at Section 1.

### **Costs**

The VAWDASV revenue budget is £5m in 2018-19. The Welsh Government programme costs associated with this guidance will be met from this budget.

### **Purpose: Issue Statutory Guidance for the Commissioning of VAWDASV services in Wales and the Duty to Follow Such Guidance -**

#### **Option 1 – Do Nothing**

As this option does not require the production of any guidance there are no direct costs associated with this option. Relevant authorities will continue to deliver their duties under the Act, but lack of guidance may result in duplication, continuation of patchy service provision and poorer outcomes for service users. This could result in a greater demand for other services, including statutory services, such as mental health, social services, housing and family courts.

The UK Government has estimated that the cost of domestic violence alone is £3.1 billion per year to the state, and around £1.3 billion to employers. The cost of the human and emotional suffering is estimated to be around £17 billion per annum. Based on population estimates, the cost of domestic abuse in Wales is over £1 billion per annum.

Reference: <https://www.gov.uk/government/publications/the-economic-and-social-costs-of-domestic-abuse>

#### **Option 2 - Use Non-statutory Guidance to Implement Change**

The commissioning guidance will provide a comprehensive outline of the considerations to be made when procuring specialist service provision for gender-based violence, domestic abuse and sexual violence.

The guidance has been developed over a number of years in partnership with a stakeholder Task and Finish group and will outline the Welsh Government requirements for a nationally consistent model of service delivery to those affected by gender based violence domestic abuse and sexual violence.

The overarching objective of the guidance is to ensure consistent consideration of the prevention, protection and recovery needs of service users within a risk and needs led framework. It will outline the usefulness of pooled and joint funding, quality principles for delivery, a structure through which outcomes for work with those who have experienced gender-based violence, domestic abuse and sexual violence should be measured and the capacity requirements of service provision.



There is a cost to the Welsh Government in producing, publishing and implementing the commissioning guidance.

The staff cost of producing, publishing and implementing the commissioning guidance over a 3 year period (starting in 2017-18) is estimated as **£49,140** and assumes one EB2 Civil servant working half a day a week during year 1, one MB2 civil servant working one day a week for year 1 and 2 and a half day during year 3 and one MB3 civil servant working one day a week during year 1 and 2 and half a day during year 3.

The Violence against Women, Domestic Abuse and Sexual Violence Sustainable Funding Task and Finish group has already been established by the Welsh Government with a membership of key stakeholders. There are no direct costs associated with the running of the Group.

Welsh Government provides funding to regional partnerships via the VAWDASV revenue grant. This funding supports regional co-ordination and engagement activities. The costs associated with the regional partnerships' functions within the Task and Finish group are accommodated within the VAWDASV grant allocation. There are therefore no additional costs associated with engaging with regional partnerships through the Task and Finish group.

**Table 1**

VAWDASV Grant	2017-2018	2018-2019	2019-2020
Regional Partnership Allocation	£1,938,000	£1,938,000	£1,938,000

The third sector allocation is based on an average wage of a Chief Executive Officer within the third sector and is based on attendance at three Task and Finish group meetings per annum and considers a time of three hours per meeting. There are six third sector stakeholder places on the Task & Finish group. The cost of engaging with each third sector organisation's wider stakeholder group is part of their day –to-day activities and is included within this calculation.

**Table 2**

Gross Salary	Hourly rate	Per meeting	Cost 2017-2018	Cost 2018-2019	Cost 2019-2020	Total
£60,000	£31.00	£96	£1,721	£1,721	£1,721	<b>£5,163</b>

The cost to the Welsh Government of providing secretariat support to the Task and Finish group is included within the costs outlined in Table 3.

Welsh Government staff costs presented in this RIA are based on the Central Services Operation Team's Pay Band Costs. Gross pay cost includes: salary; and employers national insurance and pension contributions.

**Table 3**

Welsh Govt Staff	Net Salary (	Gross Salary	Daily Rate	Annual Cost 2017-2018 Year 1	Annual Cost 2018-2019 Year 2	Annual Cost 2019-2020 Year 3	<b>Total</b>
MB3	£27,400	£35,620	£137	£7,124	£7,124	£3,562	<b>£17,810</b>
MB2	£35,750	£46,993	£181	£9,412	£9,412	£4,706	<b>£23,530</b>
EB2	£58,185	£77,910	£300	£7,800	£0	£0	<b>£7,800</b>
<b>Total</b>				<b>£24,336</b>	<b>£16,536</b>	<b>£8,268</b>	<b>£49,140</b>

In relation to the relevant authorities including local authority regional partnerships, there are no additional costs because local authorities have already formed regional groups for commissioning purposes and are delivering on a regional footprint.

If the guidance is followed, it should reduce the impact outlined in option 1. As there would be no obligation to follow the guidance, however, the savings to the state, employers and the social costs would be limited.

### **Option 3 - Issue commissioning guidance as a statutory requirement for specified bodies to follow**

The costs associated with this option are the same as those outlined in option 2, if the relevant authorities all chose to follow the guidance even if it was non-statutory.

The costs associated with issuing it on either a statutory or non-statutory basis are the same. The Welsh Government confirmed that prior to issuing any statutory guidance under the Act, it would undertake a public consultation, including a regulatory impact assessment, before issuing either non-statutory or statutory guidance; a public consultation was undertaken in 2018.

The administrative costs to the Welsh Government of analysing the consultation responses and associated with monitoring and reporting on the implementation of the guidance are included in the two full-time MB2 and MB3 Welsh Government resources identified and accounted for in Table 3.

Additionally, the monitoring of the use of the guidance by relevant authorities would be around 5% of the role of the National Adviser and is incorporated within the annual salary as detailed in Table 4.

The cost to the state, the employer and to society, as described under option 1 would be further reduced if this option was adopted.

**Table 4**

	Net Salary	Gross Salary 2017-2018	Gross Salary 2018-2019	Gross Salary 2019-2020	Total
National Adviser	£60,060	£79,296	£79,296	£79,296	£237,888
Pro-rata apportionment (5%)	£3,000	£3,965	£3,965	£3,965	£11,894

**Familiarisation Costs**

The relevant authorities as outlined in the 'Act' are broken down as follows:

***Regional Partnerships***

Gwent  
 Cwm Taf  
 Dyfed Powys  
 Western bay  
 Cardiff & Vale  
 Bridgend  
 North Wales

***Local Health Boards***

Betsi Cadwaladr University health Board  
 Hywel Dda Health Board  
 Powys Teaching Health Board  
 Cwm Taf Health Board  
 Abertawe Bro Morgannwg University Health Board  
 Aneurin Bevan Health Board  
 Cardiff & Vale University Health Board

***NHS Trusts***

Velindre NHS Trust  
 Welsh Ambulance Service  
 Public Health Wales

***Fire and Rescue Authorities***

North Wales Fire & Rescue  
 Mid Wales fire & Rescue  
 South Wales Fire & Rescue

Relevant authorities will already be preparing their structures to come into line with the statutory guidance requirements. Therefore less overall familiarisation time will be needed in the case of these relevant authorities.

We have estimated that it would take one Commissioning Manager within each relevant authority 6 hours (best estimate) to read the Statutory Commissioning Guidance, and disseminate information contained to relevant departments/stakeholders. We have costed the Commissioning Manager's time based on an average gross wage of £50,000 and their time at £27 per hour.

The total familiarisation costs are therefore estimated to be £3,240 (20 x £27 x 6 hours).

Since familiarisation times can vary, depending on a relevant authority's ability to interpret the guidance and disseminate information, a low cost estimate based on familiarisation time of 4 hours is £2,160 (20 x 27 x 4) and a high cost estimate based on familiarisation time of 8 hours is £4,320 (20 x 27. x 8).

<b>Statutory Guidance Familiarisation Costs Regional Partnerships</b>				
<i>Estimate</i>	<i>Familiarisation time (hours)</i>	<i>Rate per hour £</i>	<i>Regional Partnership affected</i>	<i>Total (£)</i>
High	8	27	7	1,512
Low	4	27	7	756
Best	6	27	7	1,134

<b>Statutory Guidance Familiarisation Costs Health Boards</b>				
<i>Estimate</i>	<i>Familiarisation time (hours)</i>	<i>Rate per hour £</i>	<i>Local Health Board affected</i>	<i>Total (£)</i>
High	8	27	7	1,512
Low	4	27	7	756
Best	6	27	7	1,134

<b>Statutory Guidance Familiarisation Costs NHS Trusts</b>				
<i>Estimate</i>	<i>Familiarisation time (hours)</i>	<i>Rate per hour £</i>	<i>Regional Partnership affected</i>	<i>Total (£)</i>
High	8	27	3	648
Low	4	27	3	324
Best	6	27	3	486

<b>Statutory Guidance Familiarisation Costs Fire &amp; Rescue Authorities</b>				
<i>Estimate</i>	<i>Familiarisation time</i>	<i>Rate per hour</i>	<i>Regional Partnership</i>	<i>Total</i>

	<i>(hours)</i>	<i>£</i>	<i>affected</i>	<i>(£)</i>
High	8	27	3	648
Low	4	27	3	324
Best	6	27	3	486

Overall Summary Familiarisation Costs

<b>Statutory Guidance Familiarisation Costs Relevant Authorities</b>				
<b>Estimate</b>	<b>Familiarisation time (hours)</b>	<b>Rate per hour £</b>	<b>Regional Partnership affected</b>	<b>Total (£)</b>
High	8	27	20	4,320
Low	4	27	20	2,160
Best	6	27	20	3,240

**Change of Processes/Procedures**

Some relevant authorities may incur additional costs however these costs incurred are unknown because they will be down to decisions taken within each relevant authority.

## Section 3

### Benefits

The absence of a statutory basis for issuing the guidance would increase the likelihood that some organisations would fail to adopt best practice strategies in this area. This could have adverse consequences, but the nature of this possibility is such that it is not feasible to assign a quantitative probability to it on the basis of objective evidence.

The UK Government's estimates on page 8 are based on the impact of domestic abuse, and do not cover other forms of VAWDASV. Furthermore, it is unlikely that it would be possible to quantify the degree by which these impacts would be mitigated by issuing guidance.

Wider experience, however, suggests that across policy areas, in a climate of shrinking budgets and multiple demands priority is often not afforded to activity unless it is a statutory duty or where there is a risk that funding will be withdrawn. Given the relatively low costs, a decision to proceed on a statutory basis is therefore defensible.

### **Issue Statutory Guidance for the Commissioning of VAWDASV services in Wales and the Duty to Follow Such Guidance**

#### **Option 1 – Do Nothing**

This option has the least direct costs, although the indirect costs of doing nothing, as identified by the UK Government's estimates, are considerable.

#### **Option 2 - Use Non-statutory Guidance to Implement Change**

This option proposes the publication of non-statutory guidance to relevant authorities on gender-based violence, domestic abuse and sexual violence.

The use of non-statutory guidance would not provide a requirement on the relevant authorities to follow the guidance and therefore, they could choose not to follow the guidance. As such, the specific benefits identified from having a consistent guidance for commissioning VAWDASV services might not be achieved.

Those who experience gender-based violence, domestic abuse and sexual violence, often have multiple, competing needs which require a series of interventions across a spectrum of services. There are already examples of collaborative working which are operating well. However this is not consistent throughout Wales which can result in a sporadic 'postcode lottery' of service provision for victims of VAWDASV.

The guidance will promote collaborative commissioning that will deliver more consistent and effective services to prevent VAWDASV and protect and support victims of VAWDASV across Wales. This can include:

- improving effectiveness in service design, procurement and contracting;

- improving population outcomes across the regions in Wales, and reduce the proportion of service users who experience negative outcomes from services;
- providing common streamlined commissioning arrangements that ensure integrated pathways of support to meet the needs of victims experiencing multiple disadvantages;
- achieving common approaches that encourage better use of data and analysis and promote more effective strategic decision making, resulting in more service users receiving appropriate and effective services;
- reducing duplication of commissioning activities;
- developing a more sustainable model of funding that achieves better value for money and boosts investment in service provision through pooling budgets, including relevant authority core budgets;
- affording service providers with greater certainty to enable enhanced flexibility and innovation in responding to service user needs;
- ensuring child and adult victims of VAWDASV receive services that fulfil their rights for protection and support;
- focusing funding to support direct service delivery rather than general co-ordination: this should become core business for local authorities as part of the forthcoming duty to deliver local strategies on VAWDASV;
- extending the reach of some services, and reduce duplication of others;
- promoting effective working relationships, trust and good communication between organisations;
- strengthening accountability and co-operation of local and regional partnerships through joint prioritisation, in particular in relation to the development of local strategies; and
- enhancing governance and improved strategic leadership through regional commissioning partnerships.

A strong multi agency response to those experiencing gender-based violence, domestic abuse and sexual violence is evidenced to improve victims' safety; a number of agencies need to be involved and the number of interventions offered to each client directly relate to their safety following intervention. This guidance will aid this collaborative working.

The formalisation of an established understanding that a co-ordinated and needs based approach will effectively address the risks and needs of those experiencing gender-based violence, domestic abuse and sexual violence and support a process which is well evidenced as an effective means of addressing gender-based violence, domestic abuse and sexual violence, improving the safety and well-being outcomes of victims, will contribute to a cessation of abuse and violence with associated cost benefits to the state, employers, individuals and society..

### **Option 3 - Issue commissioning guidance as a statutory requirement for specified bodies to follow**

This option proposes making statutory guidance to relevant authorities for the commissioning of gender-based violence, domestic abuse and sexual violence services.

The specific benefits outlined in option 2 above also apply to this option. The Welsh Government has undertaken a public consultation before issuing either non statutory or statutory guidance.

As well as the benefits outlined in option 2, the additional benefit of this option is the relevant authorities would be under a duty to follow the guidance. The only way in which an authority could depart from the guidance was if they identified an alternative way of doing so. In such circumstances the authority would need to publish details of the alternative approach. In the event the Welsh Ministers were unconvinced of this approach, this option provides a reserve power of direction for the Welsh Ministers to require authorities to follow the guidance. This therefore provides significant weight to any guidance issued under this option.

Such guidance will require the implementation of best practice and will assist in the promotion of consistency and high quality standards across Wales.



## **Section 4**

### **Preferred Option**

The preferred option is **option 3** - Issue commissioning guidance as a statutory requirement for specified bodies to follow

This option would contribute to the achievement of consistency throughout Wales, ensure victims can access needs-led and evidenced based services throughout Wales and ensure the implementation of best practice in the way in which these issues are tackled across Wales effectively. The reserve power of direction for the Welsh Ministers will require authorities to follow the guidance if necessary. This therefore provides significant weight to the guidance and thus will ensure that relevant authorities adopt effective collaborative working arrangements for commissioning VAWDASV services in Wales.

### **Post implementation review**

The Welsh Government's principal policy aim in this area is to promote high quality collaborative commissioning that delivers more consistent and effective services for victims of VAWDASV with the aim of reducing the rate of gender-based violence, domestic abuse and sexual violence. The Act supports this aim by seeking an improved Public Sector response to gender based violence, domestic abuse and sexual violence. The main aims of the Act are to improve arrangements to:

- i) promote awareness of, and to prevent, protect and support victims of gender-based violence, domestic abuse and sexual violence;
- ii) strengthen the strategic leadership and accountability for gender-based violence, domestic abuse and sexual violence; and
- iii) improve the consistency, quality and join-up of service provision in Wales.

An assessment of the introduction of the statutory commissioning guidance policy will be challenging. For the most part quantified outcomes are likely to be difficult to discern in the absence of a counterfactual (an estimation of what would have happened in the absence of the various interventions). However implementation can be evaluated through process evaluations.

This type of evaluation aims to understand the process of how policy has been implemented and delivered, and will include assessments of its effectiveness. Proposals for an evaluation framework are being developed. The National Advisers will be involved in monitoring the use of the statutory guidance for commissioning VAWDASV services in Wales.

## **Section 5**

### **Impact Assessments**

Impact assessment that have been completed to support the guidance for the commissioning of VAWDASV services in Wales include:

- Equality Impact Assessment (EIA)
- Children's Rights Impact Assessment (CRIA)
- Welsh Language Impact Assessment (WLIA)

Further detail is available from the Violence against Women, Domestic Abuse and Sexual Violence team via [VAWDASV@gov.wales](mailto:VAWDASV@gov.wales).