

Consultation Response Form

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DRAFT Guidance for the commissioning of VAWDASV Services in Wales

You can find out how we will use the information you provide by reading the privacy notice in the [consultation document](#).

Question 1 - Does the draft guidance offer commissioners the opportunity to improve arrangements for:

- a. the prevention of VAWDASV;
- b. protection of victims of VAWDASV; and
- c. support for victims of VAWDASV?

- We are concerned that the list of organisations/authorities that VAWDASV partnerships are expected to invite to participate in their activities does not include those that work directly with children affected by VAWDASV. It **does** include organisations that work with children that have been sexually abused or exploited, however we know that domestic abuse, violence against women and sexual violence in families can have other profound negative consequences for children:

'Children are aware of what is going on, are witness to and involved in domestic

abuse and are often directly abused: within that situation children make complex decisions in order to survive, protect themselves and others, intervene, and where possible get on with their lives'¹

Having parents or carers involved in domestic abuse can often contribute to children experiencing neglect in a number of forms.

Children's voluntary sector organisations are delivering specialist support services to these children and families through local authority commissioned family support, Families First, Flying Start and grant or voluntary funded services. They will have an overview of how prevention, protection and support can best be delivered to children and young people, alongside colleagues in health, education and children's services and specialist VAWDASV services.

It seems imperative that this expertise is harnessed to inform a coherent, family approach to regional VAWDASV plans. This would support the aims of the regional approach including:

'ensure child and adult victims of VAWDASV receive services that fulfil their rights for protection and support' (p 12-13)

2. We fully support the emphasis on service development being informed by the voices of those affected by VAWDASV. The *'Are you listening and am I being heard'* report addresses the key issues in implementing this from an adult victim perspective. However children's views, experiences and human rights do not feature within this report and therefore have not informed the National Strategy.

3. Perpetrator services (2.8)

This section has a strong adult focus. Yet there are services addressing the needs of children and young people that perpetrate abuse, or engage in harmful sexual behaviour being delivered in Wales, including the Barnardo's Better Futures service. Better Futures provides specialist intervention to children and young people affected by CSE (the Seraf model) and HSB (the Taith model). More recently it also provides a therapeutic service to younger children referred for CSA or HSB.

Evidence from the Better Futures database shows the extent and overlapping nature of abuse experienced by children referred, some of whom are presenting, or being viewed, as perpetrators, or as victims. No matter which 'route' the children are referred for support to Better Futures, they often have shared experience of trauma and abuse. This means that a comprehensive initial assessment is required which makes no assumptions, based on referral description, about what support and

¹ <http://dera.ioe.ac.uk/9525/1/0064117.pdf>

intervention is required to address the presenting problems. Those referred for HSB sometimes have profound, unaddressed abuse experience at the root of their behaviour. Those that present with CSE may sometimes be exploiting others as well as being victims.

STATIC FACTORS	Taith (SHB)	Seraf (CSE)
Exposure to domestic abuse	62%	43%
Reported sexual abuse	40%	29%
Reported physical abuse	38%	32%
Reported emotional neglect	55%	51%

Understanding how abuse and abuse experience shapes children and young people as they grow is essential to enable appropriate targeting of interventions and ultimately tackling the problem of cycles of abuse, across families, peer groups and generations.

In section 2:9 Principles of commissioning it is stated that the principles include:

‘A commitment to provide all survivors, including children and young people, equal access to holistic, appropriately resourced, high quality, needs-led, strengths- based, gender responsive services across Wales’

‘A commitment to be informed by survivors, including children and young people, to inform needs analysis, service design and whole system responses’

There is clear dissonance between section 2:8 and 2:9. This might be addressed, somewhat, by describing how VAWDASV services interface with the work of the local safeguarding boards.

Question 2 - Does the draft guidance make it clear what the Welsh Government will expect to happen at each stage of the commissioning process?

The commissioning cycle is well described and additionally informed by referencing the Lloyds Bank Foundation commissioning toolkit.

We welcome the co-productive approach and the outcomes focus in the commissioning

process.

Question 3 - Does the draft guidance make clear that commissioned services must be based on regional needs?

Our view is that, whilst it is important to allow scope for regions to identify their specific needs, a clear baseline of data required to commission services across VAWDASV in specified areas would be helpful , for example:

- Specialist refuge provision
- Community based family safety and support provision
- Specific specialist services to address the therapeutic needs of sexual violence victims – both for adults and for children
- BAME specific service support
- LGBTQI specific service support

Data will be available already to inform and guide service provision, some of which may already be in place. Clearly mapping areas of service that should be addressed will aid regions in ensuring appropriate coverage of VAWDASV and lead to more consistent services across Wales.

Requiring an outcome focussed approach means prescriptive approaches will be avoided, so local variation and responsiveness can be achieved in this way.

Question 4 - Does the draft guidance make clear that all stakeholders must be engaged in designing and commissioning services, including service users, survivors, third sector and VAWDASV specialist services?

The guidance does make this clear. We would question how this might be resourced and facilitated. Again, some of this may already be in train in some areas. Suggestions of methods for achieving this meaningfully, and within limited budgets, possibly utilising digital methods, would be useful.

Question 5 - The draft guidance should be read alongside the:

- Home Office Violence against Women and Girls Services - Supporting Local Commissioning Document (for England) and the England and Wales National Statement of Expectations,
- Lloyds Bank Foundation's Toolkit, and
- Leading IPC Guide

Is it clear that the additional documents must be considered and is this helpful and practical?

This is clear, however the usefulness of having four documents to guide the process rather than one, clear, well described commissioning guide is questionable.

Question 6 - Are there any other barriers to commissioning effective VAWDASV services that are not addressed by the draft guidance, and what would need to be included to address them?

As a number of funding streams will be utilised to deliver these services it will be important to ensure synergy in the underpinning principles – to preserve an outcome focus, for example.

Question 7 - Are the Timeframes for commissioning services in line with the guidance feasible (from April 2019)?

This is a question which can only be answered fully, in our view, by VAWDASV planning group leads rather than single organisations such as ourselves. However the Flexible Funding Pathfinders will be running from 2018-19 and much will depend on the outcomes of that pilot as to whether regions will be informed and ready to embark on this approach from April 2019.

Question 8 - Are there any issues relating to impact on the Welsh language, equalities or children's rights in relation to this draft guidance that you wish to highlight?

Issues addressing children's human rights have been addressed earlier in this response. It is our experience that language can be an important facilitator in the successful delivery of support services and represents a route to ensuring services can be more equitably delivered. Considering the language needs of service users should therefore form a key part of commissioner's considerations.

Question 9 - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

None to report.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: