**Consultation questions**

You are welcome to respond to any of the questions in this document. Questions 1-8 ask for general feedback on our approach and questions 9-10 are more detailed. These questions may be more relevant to you if you are a professional, working with victims, survivors and perpetrators of VAWDASV.

**Question 1**

We have set out our main priorities in the [**Objectives**](https://gov.wales/consultation-refresh-violence-against-women-domestic-abuse-and-sexual-violence-national-strategy#Ourobjectives). Do you think these are the right priorities?

Yes/~~No~~

Please give reasons for your answer:

The objectives are sound, but there is a great deal of frustration that Welsh government is consulting on a new strategy without analysing why its previous strategies have failed to better protect women. In particular, whether inadequate funding was a significant reason for past failure.

This is the second strategy under the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 and the latest in a series of strategies dating back 20 years. The objectives are the same and words are fine, but female UNISON members have argued nothing has changed for women.

Misogyny and male violence against women remain endemic in our society and sexual harassment is common. Women’s trust in the police has been seriously damaged and there is a lack of faith in the police and criminal justice system deal with domestic abuse properly.

In Welsh Women’s Aid, Welsh government has a willing partner, an expert resource of evidence and data, but it doesn’t appear it has been called upon in this consultation.

The consultation omits to say what would change immediately for women suffering violence and the absence of timescales for improvement causes concern. In their desperation, these women need ‘quick fixes’ now. For instance, accessing a women’s refuge ought to be free for women fleeing danger and her financial circumstances should be irrelevant.

We need to hear how Welsh government can support women in rebuilding their lives after suffering domestic abuse. There is nothing about tackling control by financial abuse and or why misogyny should be a hate crime.

Wales needs a national policy on domestic abuse and nation-wide training so all employers know what they must to do support employees experiencing it, including providing special leave. This would develop, deepen and expand upon the pioneering work of the Workforce Partnership Council joint statement encouraging the public sector in Wales to offer paid leave for victims of domestic abuse.

Equally, given the scale of VAWDASV, employers need to understand their employees could be possible perpetrators and need policies on how to tackle male violence. Employers can help perpetrators to end their abusive behaviour by providing information about the services and support available to them and encouraging the perpetrator to seek support and help from an appropriate source.

Providing trade union equality reps with full-time release to work with employers and their colleagues here could help create an urgent sea change in attitudes, including around sexual harassment in the workplace. More details on a national policy on domestic abuse is provided in response to Q. 2 and Q. 3. Full-time release for equality reps would help drive change in all sorts of areas that Welsh government has identified, included the Race Equality Action Plan.

In objective 1, Welsh government is right to focus on challenging public attitudes to violence against women, domestic abuse and sexual violence across the Welsh population through awareness raising. More detail is required. This will require huge and sustained funding for publicity campaigns over the next decade, throughout the media, in hospitals, surgeries and in public spaces, including pubs and shops and on public transport. The mass public education campaign around drink driving could be a template.

UNISON school support staff members report the prevalence of young boys making inappropriate comments about girls and of incidents of sexually assault at school. In objective 2, it is important that the education curriculum includes appropriately focused lessons, throughout a pupil’s educational pathway at school, from age 5 to 18 on how to respect others and the other aims of objective 2 (the importance of safe, equal and healthy relationships and empowering them to make positive personal choices).

Having these lessons from a young age will help break the cycle of learned behaviour of misogyny and violence against women and girls, which children can be exposed to at home, in the street or through television. We need to plant the seed of learning as early as possible that there is correct way to treat one another.

Welsh government’s commitment to allow Hafan Cymru and Welsh Women’s Aid access to speak in schools to pupils has stood for 20 years, but that’s not happening evenly across the country because small refuges lack the money and is an example of how well-meaning strategies are not effective without the right funding. This failure and how it might be rectified, is not addressed by the consultation.

There are already children’s workers in every refuge working with families. Welsh government needs to better fund these vital services.

Objective 3 is the key one and will save women’s lives. VAWDASV is a male problem and we need to make this a male responsibility not what women have to do to keep themselves safe.

There is concern domestic abuse doesn’t seem to get due regard from police when reported. For example, we know of a case whereby a woman was asked to sign a disclaimer by the police that they were not responsible for further harm that might be caused to her when she refused to move from Wales because her family and job were here.

More clarity is required on objective 5 as to who is a relevant professional and the specifics on what they will be asked to do. Here training and support will be key to help them identify VAWDASV and take appropriate action when they are speaking to members of the public. Training must be mandatory and include senior employees in HR and managers. It is recommended that Welsh Women’s Aid is closely involved in designing and delivering the training.

It is essential (in objective 6), that women who have suffered VAWDASV are afforded the best possible services and that women can access these services when they need to. Here Welsh government must provide not only the emergency services ensuring a woman’s safety (including free access to a refuge), but should think more creatively and pro-actively, in how it can help women rebuild their lives.

This means help to access free mental health and health support. Survivors may well be suffering PTSD and should not be left alone to navigate their way through accessing services and the assistance they desperately need. There needs to be a clear pathway through these services to enable immediate access when it is needed.

Welsh government should examine what financial support it can provide to women to allow people to get their lives back together. We have already talked about how women are frequently abused financially. Welsh government could provide free access to education for victims, empowering them in restarting their lives. This wouldn’t cost Welsh government much, compared to the opportunity provided to the individual.

We are aware, certainly in South Wales that social services aim to keep child with family even if perpetrator stays with the child’s mum. In such cases, Welsh government should consider what extra resources are necessary to be provided to the local school to support that family.

**Question 2**

Do you think the overall approach we will be taking, as set out in the sections on the [**Blueprint**](https://gov.wales/consultation-refresh-violence-against-women-domestic-abuse-and-sexual-violence-national-strategy#Blueprint), is the right one to stop violence against women, domestic abuse and sexual violence?

Yes/~~No~~

Please give reasons for your answer:

It is essential Welsh government’s strategy is informed at every level by listening to survivors and learning from their experiences and how support can be improved.

On street harassment, the consultation words are correct and women and girls should not have to suffer this abuse. Intervention here could help to reduce the overall likelihood of violence generally. As has been noted, women’s trust in the police force has been badly shaken and there is a great deal of work to be done by the police engaging with local communities to rebuild faith.

Welsh government is right to identify workplace harassment as a crucial area to be urgently addressed. The consequences for women who experience harassment can be profound. They might isolate themselves or avoid certain colleagues or situations; they may look for another job and their mental health and confidence can be affected.

The scale of the problem is backed by a wealth of (UK-wide) trade union data. TUC research in 2016 revealed 52% of women had experienced unwanted behaviour at work. A 2019 study by the TUC found nearly 7 out of 10 LGBTQ+ workers have been sexually harassed in the workplace and in June 2021, a joint UNISON/Nursing Times survey of 2000 UK nurses found that sexual harassment in healthcare has become ‘normalised’ and not enough is being done to address it. 60% had been sexually harassed either by patients or colleagues.

(2016: *Still just a bit of banter, sexual harassment in the workplace*, TUC report; 2019: *Sexual harassment of LGBT people in the workplace*, TUC report; UNISON (2019) *It’s never ok,* *a report on sexual harassment against healthcare staff)*

Female employees have put up with sexual harassment because they felt nothing would be done if it was reported. This is not acceptable. Employers must be clear with their staff that there is a zero tolerance of sexual harassment in workplaces, including on-line abuse.

Where trade unions are recognised and valued as a source of expertise by employers, health and safety evidence proves the working environment is safer, more professional and respectful and a happier place for all.

We would argue that domestic abuse is a trade union - workplace issue too, not least because of the impact it has on an individual’s well-being and performance at work. Employers therefore should be motivated to take action to tackle domestic abuse, and a national policy would provide them with the right tools to do this. More detail is provided in Q. 3.

Reference has already been made to ensuring trade union equality reps are given with full-time release to work with employers to tackle VAWDASV. This would be cost relatively little and would result in a speedier change in culture. Equality reps would help to normalise talking about VAWDASV in the workplace, which is important and could also assist in taking forward the Welsh government’s equality agenda, for example around the Race Equality Action Plan.

Female UNISON members report the way they are sometimes spoken to in the workplace by men is demeaning and belittles their role. Male managers for instance, who always call their female employees “flower” (and don’t refer to male colleagues in similar informal terms), or who always insist a woman makes the tea because “you make a better cup than me”. Of course, much worse language may regularly be used, but this sort of culture so deeply engrained and accepted that behaviour is explained away with “it’s just the way he is”. That’s not right; everyone should be treated respectfully at work and tackling VAWDASV involves all of us examining behaviour and recognising what we must do.

Typically, organisations haven’t dealt with workplace harassment in the correct way. It might be to pay off the individual and hope the problem goes away. Non Disclosure Agreements are too often used to silence those who report sexual harassment and protect the perpetrator. Mandatory training here is key and HR staff and managers need to receive the training too. Welsh Women’s Aid should be involved in helping design and deliver the training.

Where organisations are more progressive tackling sexual harassment in the workplace or on supporting employees experiencing domestic abuse, the initiative for a formal policy has often come from the recognised trade union.

Generally, across local government in Wales however, there are no arrangements to assist and support employees with VAWDASV and managers often refer the individuals to their trade union to help. Unions and union reps are trusted by their members and they can be a valued part of the solution to tackle VAWDASV, but it is the employer who must take the lead to support those going through domestic abuse correctly and they have the capacity to do that.

Union reps along with managers, should be provided with training in this area and importantly, be given the time off to undertake the training. We will talk about helping women disclose abuse later and there is nothing worse for a woman trying to disclose to someone, if they are met with the wrong reaction because that individual hasn’t been trained in how to respond.

Under communications and engagement, Welsh government talks about professionals in Education, Health, Housing and other areas can be the first line of defence against VAWDASV and securing safety for victims. They too must benefit from this training.

On working with those who carry out abuse, there is a feeling that in the past we have spent time looking at effects of abuse, of moving women into safety, but not dealing with the perpetrators and working to break their cycle of violence.

Women shouldn’t have to move; they shouldn’t have to go to a refuge and uproot their lives. Men are allowed to stay and the balance is completely unfair. To use a common health and safety analogy, you remove the threat from an unsafe place.

This strategy must fully engage men and challenge them about their behaviour and work with them to reform. In this approach, Welsh government references police, prison and probation. We note training on VAWDASV for perpetrators is not compulsory and their entrance to the programme depends on whether it has been ordered by the judge in that particular case. This cannot be right and their needs to be uniformity across the criminal justice system. More comment on this is provided on Q.7.

With regard to embedding a cultural shift in attitudes, the pioneering White Ribbon campaign has been important, but this shouldn’t be left solely to a charity. We need the weight of the state to drive this campaign.

There is a postcode lottery in how women experiencing VAWDASV are supported across Wales and this must be addressed under effective strategic planning and commissioning specialist services. Every woman needs the best possible support, no matter where she lives.

There has been some discussion already about why Welsh government has not chosen to use the wealth of data held by Welsh Women’s Aid in this consultation. It is recommended Welsh government liaises with that organisation before proceeding with the proposed review of the national indicators.

Welsh government is right intersectional analysis helps our comprehensive understanding of VAWDASV and the needs of all those affected are addressed including children, older people, Black people, disabled people and LGBTQ+ communities. More detail is provided on this in Q. 3.

**Question 3**

We have set out the principles which underpin the draft [**National Strategy**](https://gov.wales/consultation-refresh-violence-against-women-domestic-abuse-and-sexual-violence-national-strategy#Nationalstrategy). Do you agree with these?

Yes/~~No~~

Please give reasons for your answer:

We wholeheartedly agree with the whole society approach: ending VAWDASV and supporting those who need it is everyone’s business. Too many people still excuse negative or abusive male behaviour towards women. Casual victim blaming is common with the woman’s behaviour (wrongly) judged to have contributed to the abuse.

Generally, people don’t know about how they might intervene to stop abuse. Welsh government can generate a nationwide discussion about why society tolerates the abuse of women and how we should help empower women to disclose and give them the safe spaces and support to disclose. Giving them more opportunity and assistance to disclose means the faster support can be provided and the end of their abuse hastened.

We need a massive public education campaign where people are bombarded with the right messages: why male abusive behaviour is not acceptable, noticing the signs and how to take action to help others.

Let’s start with being more honest and open: alcohol and drug use can lead to male violence. We know male drinking around sporting events leads to increased violence against women. Therefore, the publicity campaign could be targeted around football and rugby matches, through television, in newspapers and at stadiums. Why do people face a barrage of betting adverts during these events, which can be socially harmful, rather than positive government education messages supporting women’s right to live safely?

Advertising needs to be frank and show the consequences of committing abuse for the man. That he will lose his job and face prison.

In parallel to this, the public needs the assurance that the police will treat VAWDASV extremely seriously and be more pro-active in intervening to protect women.

With regard to helping women disclose, the advertising campaign should address the

culture of ‘not snitching’. We need to give women the knowledge that what is happening to them is wrong and the importance of their reporting it to the authorities.

We have proposed a national policy on domestic abuse and what every employer must offer, including providing special leave. This must be across the board and in all sectors, not just public services.

The benefits of a clear employer policy on domestic abuse are:

• It raises awareness of the issue in the workplace

• It makes clear the employer position on domestic violence and abuse

• It has the potential to make disclosing abuse less daunting for the victim and destigmatises it.

• The employer is less likely to initiate disciplinary/capability/attendance procedures on victims/survivors

• Risk assessments will be undertaken, protecting recipients and their colleagues

It would set out the signs of domestic abuse, roles and responsibilities, education and training, steps to ensure safety in the workplace, as well as what the employer can practically offer in terms of financial assistance, flexibility and paid leave.

At present, a woman requiring emergency (sickness) leave because of abuse may find herself disciplined at work through no fault of her own, if her sickness absence exceeds what the employer deems acceptable. The trade unions have already proved their readiness to assist Welsh government in this area with the Workforce Partnership Council joint statement covering the public sector and we are again ready to help develop a national policy.

We must also note, the Covid pandemic has changed the world of work and many women are now home working and close to the perpetrator. On 6 April 2020, the charity Refuge reported that the National Domestic Abuse helpline had seen a 25% increase in calls and online requests for help.

Home-working and isolation from colleagues also increases the possibilities of online harassment of women by male work colleagues.

An advertising campaign should also reflect that lots of different people can be abused and this reflects the point in Q.2 why intersectional analysis is so important.

There is no evidence to suggest that some ethnic or cultural communities are any more at risk of domestic abuse than others. However, the experience of UNISON’s Black women members is that they also face racism and additional stereotyping. This means that they may be unwilling to seek help from statutory agencies (such as the police, social services, or housing authorities) but also from their employer because they fear the response may be based on particular cultural, ethnic or religious stereotypes. Employers may even avoid intervening for fear of being perceived as racist.

There are many older women in violent situations for instance, who perhaps because of age or because they live in more a rural area, don’t associate themselves with a ‘stereotype’ of an abused woman.

Welsh government’s own statistics show disabled people are more likely to be victims of domestic abuse and a high proportion of the LGBTQ+ community will experience domestic abuse in their lives.

We know that the lack of accessible refuges and temporary accommodation, the scarcity of information on tape or in Braille and the unavailability of sign language interpreters may compound the problems that disabled women fleeing abuse face.

One of the major barriers to recognising LGBTQ+ domestic abuse is that the abuse has traditionally been portrayed as a heterosexual issue. The perpetrator may use their victim’s sexual orientation or gender identity against them. All these factors can also act as a barrier to victims getting help and particularly in the workplace if someone is not open about their sexuality at work. LGBTQ+ women may also fear approaching mainstream domestic abuse services, thinking they will meet prejudice or lack of understanding. Trans women may have particular concerns about how they will be received.

It is also important that employers are aware that although the majority of domestic abuse victims are women, other groups may be affected and are also aware of the specialist support available to LGBT+ people.

All of the stories of the people above should feature in the public education campaign.

Violence against women is a public health issue and that is why a woman’s access and stay at a refuge should be fully funded by the public purse, just like access to the NHS for a physical health issue. We know of distressing examples where, despite abusive husbands and partners blocking women’s bank accounts, the women have still been expected to pay for her refuge stay.

A woman suffering abuse can be moved miles away from job and placed in refuge. Women are told to give up their job and move children. Making the women take the further financial hit of paying for the refuge is not fair and cruel. Most women are broken at the time of seeking help; to then worry about paying for the refuge may make them suicidal and is a further abuse of their rights to be safe.

Given the prevailing culture of victim blaming, charging for refuges and the fact they may be uprooted from their community, it is no wonder some women stay with the perpetrator.

Women may not have the money or be eligible for legal help or supportive (therapeutic) – counselling and children’s support. Fully funded refuges should be able to help a woman sort out her finances for the future.

**Question 4**

Do you agree with our [**immediate priorities**](https://gov.wales/consultation-refresh-violence-against-women-domestic-abuse-and-sexual-violence-national-strategy#Immediatepriorities)?

~~Yes~~/No

Please give reasons for your answer:

Rather than ‘seeking to reinvent the wheel’ with a new well-meaning strategy that has the same objectives as previous strategies, UNISON female members want to see action now that will save women’s lives. This must be the immediate priority. No dates or timescales when things will improve for women have been given in the consultation, so it is assumed the change will be judged longer term.

This is not good enough for women in danger. The timescale to achieve changes must be pinned down.

Immediate priorities should be: fully funded refuges that assist women to access any service they need; a nationwide public education campaign and a police and justice system that treats VAWDASV seriously and tackles male behaviour.

Early starts should be made on the promotion of healthy relationships in the school curriculum; tackling workplace harassment utilising the help of trade unions and a national policy for employers on domestic abuse.

Welsh government should be working side-by-side with Welsh Women’s Aid and using their data, expertise and advice. We question the need to create a central repository which would likely replicate the data of Welsh Women’s Aid. That organisation already has the research and evidence about what works well; they are working on the ground in this area every single day.

Similarly, though improved collaborative working is of course better, a focus on regional boards is not an immediate priority (public service boards are there already and are responsible for community strategies).

We are not persuaded that new performance indicators need to be invented when previous strategies have failed because they have not been resourced properly.

**Question 5**

What do you think is the most important thing we can do to stop violence against women, domestic abuse and sexual violence?

We have already indicated UNISON priorities should be fully funded refuges that assist women to access any service they need; a nationwide public education campaign and a police and justice system that treats VAWDASV seriously and tackles male behaviour.

Every time woman is violently assaulted there is a pattern of behaviour which may have been ignored or gone unnoticed by the police. There should be a great deal more concentration on identifying and risk assessment to protect victim and addressing the man’s behaviour. When the police force approaches investigation of domestic abuse, they should treat the victim more sympathetically and give her everything she needs to feel comfortable about disclosing and taking the matter further. For example, someone in an abusive relationship who reports an incident to the police, but then retracts it under pressure from her partner, should be provided with high quality support and access to services at the point of the original reporting.

Despite all of the training the police have received and the Domestic Abuse Act putting an emphasis on the police role, the treatment of women at the first point of contact and throughout the process is still poor. The fact that the police officer may be a perpetrator or have no empathy to the woman’s situation is simply not acceptable. The latest media cases where police have sexually assaulted, sexually harassed and even murdered women shows women cannot trust the police so immediate change needs to happen to rebuild that trust,

**Question 6**

Do you think there is anything we should be doing as part of this Strategy that can have a positive effect on opportunities for people to use the Welsh language?

If we want women to feel confident and take steps to report abuse, we must use language they feel most comfortable with. If survivors are in a bad place, it makes a huge difference if they can speak in their own language.

This is about women having the right to have access in whatever language they need that means Welsh, English and wider as necessary.

Where women have come from abroad and whose first language may not be Welsh or English, it may be even more difficult to reach out for help. Publicity around this campaign should be available in multiple languages, all emphasising that women should be treated with respect, how abuse is not tolerated, how women can seek help and how men should take action to change behaviour.

Whatever the language, publicity and literature should use as simple, clear and concise text as possible. Account should be made for those with dyslexia or disabilities, Braille for blind people and for deaf people using sign language.

This is particularly important given the higher incidence of VAWDASV amongst disabled people.

**Question 7**

Are there any other things you think we should be doing to stop violence against women, domestic abuse and sexual violence, or do you have any other comments?

We have already discussed the need for uniformity across the criminal justice system in how violence against women is treated by the various authorities. A common approach would be useful in convincing men of the gravity of the situation and the need to take action to change their behaviour.

UNISON female members have noted with anger that sentences for men who commit domestic violence are more lenient than for those who assaults another person in the street. Attacking another man in the street and breaking his nose might result in a sentence for GBH or ABH for the perpetrator. A man breaking his partner’s nose doesn’t necessarily result in a similarly heavy punishment.

**Question 8**

How should we measure progress and success in delivering the things outlined in this Strategy?

We have already stated our concern that there has been no analysis of why previous strategies in this area have not succeeded in better protecting women.

Put bluntly, success has to be less women being killed, fewer women and girls being sexually harassed. We need to ensure women are safe in their homes and workplaces and the need to effectively tackle VAWDASV is embedded in other policies across the board.

We recommend Welsh government reflects on past performance indicators, rather than inventing new ones.

**The remaining questions are more detailed:**

**Question 9**

Do you agree with the [**scope of the Strategy**](https://gov.wales/consultation-refresh-violence-against-women-domestic-abuse-and-sexual-violence-national-strategy#Scope)?

Yes/~~No~~

Please give reasons for your answer:

We note Welsh government’s comment that male violence and abuse towards women happens because they are women and also that this is not to say that men cannot be subject to abuses of power and that sometimes women can be perpetrators.

Male on female abuse is endemic and the focus of this strategy must be effectively tackling male abusive behaviour towards women.

**Question 10**

We have proposed governance arrangements, which include working with key partner organisation and a number of sub-group/workstreams to tackle specific issues. Do you think working together in this way will improve coordination of work to stop violence against women, domestic abuse and sexual violence?

Yes/~~No~~

Please give reasons for your answer:

Better co-ordination of partner organisations is important.

The trade unions would be very willing to work with Welsh government in developing a national policy for employers on domestic abuse.

We have offered plenty of comment on the beneficial consequence of providing trade union equality officers with full-time release. They would be critical to preventing abuse against women in the workplace and wider therefore helping women, employers and society in general.

We make comment here that it is important that valid Welsh government policy initiatives in other areas do not inadvertently undermine women’s safety. An example would be local authorities’ green strategies which often include reducing street lighting or turning off CCTV. Clearly, it is essential women’s rights and safety be evaluated in all policy areas.

**Question 11**

Are you a professional, working with victims, survivors and perpetrators of VAWDASV?

Yes/No (see below)

Public service employees belonging to UNISON and working in local government, the health service and third sector and elsewhere have supported women experiencing abuse. Their first-hand knowledge has shaped this consultation response as have the testimonies of UNISON members who are survivors of VAWDASV.

The overwhelming majority of UNISON’s members are female.

**Question 12**

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:

Refuges must be well funded by the state and provided with all the tools they need to support women. Sporadic funding of refuges has created a postcode lottery of support for women in desperate situations. Staff at refuges need to be funded appropriately rather than have to find money from other sources.

Though they are outside the terms of reference of this consultation and remit of Welsh government, UNISON would like to see a statutory duty for employers to prevent sexual harassment and explicit protections from third-party harassment and enforce these changes and change the law to end the unlawful and disreputable use of nondisclosure agreements in cases of sexual harassment.

Consideration should be given about the need for a Women’s Bill of Rights.

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