Consultation Response: Violence against women, domestic abuse and sexual violence (VAWDASV) National Strategy

Deadline 7 February 2022

Response on behalf of Learning Disability Wales

Learning Disability Wales is a national charity representing the learning disability sector in Wales. We work with people with a learning disability and their families, Welsh Government, local authorities, disabled people's organisations and the voluntary sector to create a better Wales for all people with a learning disability.

Contact

Dr Grace Krause, Policy Officer: grace.krause@ldw.org.uk

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**. Do you think these are the right priorities?

Yes/No

Please give reasons for your answer:

We think the overall objectives of this policy are good ones. In particular we are in support of an approach that targets perpetrators of violence against women and works preventatively.

However, it is worrying that victims of sexualised or gendered violence only really appear in the last objective. We would like to see support for victims more central in this proposal.

Question 2

Do you think the overall approach we will be taking, as set out in the sections on the **Blueprint**, is the right one to stop violence against women, domestic abuse and sexual violence?

Yes/No

Please give reasons for your answer:

We would like to see more accountability for institutions to deal with gendered violence and complaints. Often power differentials can make victims of gendered violence especially vulnerable. The guidance should make provisions to ensure people who are particularly vulnerable to abuse can have the protection they need.

Looking at the five proposed sub-groups there is some concern that you have focused predominately on forms of violence that happen outside of the house (street and workplace harassment). The majority of violence experienced by women worldwide is committed by intimate partners¹. Why are there no sub-groups on domestic violence or sexualised violence? While street harassment and workplace harassment are important it is strange to see these forms of violence prioritised over forms of violence that are far more prevalent but often happen behind closed doors.

Question 3

We have set out the principles which underpin the draft **National Strategy**. Do you agree with these?

Yes/No

Please give reasons for your answer:

Question 4

Do you agree with our immediate priorities?

Yes/No

¹ https://www.who.int/news-room/fact-sheets/detail/violence-against-women

Please give reasons for your answer:

The priorities seem mostly appropriate but we would have liked to see some more information on material resources that can enable people in abusive relationships to leave their abusers.

We would also like to emphasise the need to include the voices of people with a learning disability within all these points to make sure that their specific needs are taken into account here.

Question 5

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

One thing that is missing from the proposal is concrete plans on how to support victims of domestic abuse and other forms of violence. While there is much focus on perpetrators of violence against women, there are no specific points on how victims or survivors are going to be supported, especially if the abuse is ongoing. One thing that we would like Welsh Government to be clearer about is how people in abusive relationships will be supported. The guidance acknowledges that disabled women are particularly vulnerable to abuse and that the guidance will specifically explore how disabled women can be supported. Here would have been good to look more at the experience of disabled women and why they are more vulnerable to abuse and exploitation than other women. Disabled women, especially women with learning disability, often experience abuse at the hands of partners who they rely on for support. Leaving the abusive relationship can then also mean losing that support. While this is an issue that is particularly pronounced for disabled women, economic and other material factors can be a major factor in keeping people in abuse relationships. Welsh Government should be more explicit on how it plans to empower women to leave abusive relationships by making sure they do not lose vital support when they leave a relationship.

Another thing that can stop people with a learning disability in particular from leaving abusive relationships is fear that they might have their children taken away. Here support for people with a learning disability should be significantly improved in order to make sure that mothers in abusive relationships are not incentivised to cover for their abuser out of fear of having their children removed.

Lack of accessible information and training on healthy relationships and how to spot abuse is another significant issue for people with learning disabilities. This is often a factor in parents with learning disabilities having their children removed. Women with learning disabilities are more likely to be in unhealthy relationships and are often targeted by men with a history of abuse. This in turn can lead to their children being removed not because of the mother's parenting skills but due to her choice of partner and perceived inability to keep her children safe from abuse. People with learning disabilities need access to good quality information and training on relationships and abuse in a way that they can understand throughout their lives including during their school education and also as adults.

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?

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 urge Welsh Government to make this guidance explicitly trans-inclusive in line with the forthcoming LGBTQ+ Action plan for Wales. While the guidance does acknowledge that LGBTQ+ people are at a higher risk of experiencing violence, again it would be nice to find this acknowledgement not just one discrete passage but actually integrated throughout the guidance. We are also disappointed to not find specific mention of nonbinary people in this guidance, despite the fact that nonbinary people also experience specifically gendered forms of violence. The marginalisation of nonbinary identities is particularly evident in the easy read version of this document where you write that sexual violence mostly affects women but can also affect men. This implies that everyone falls either into the category of "man" or "woman", which is not accurate.

We are aware that there are also issues around the accessibility of services supporting survivors of abuse. For example, women's refuges/shelters are often not fully accessible for people with mobility issues including people who use a wheelchair. Also, many services lack awareness and understanding of

the specific needs of people with a learning disability so are unable to offer adequate support to victims of abuse who have a learning disability.

Question 8

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

The remaining questions are more detailed:

Question 9

Do you agree with the scope of the Strategy?

Yes/No

Please give reasons for your answer:

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:

Question 11

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

No

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:
Name: Dr Grace Krause
Organisation (if applicable): Learning Disability Wales
Email address: grace.krause@ldw.org.uk
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