



Community Housing Cymru Group response

A consultation on draft statutory guidance on “Ask and Act” under section 15 of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 and section 60 of the Government of Wales Act 2006

1. About Us

The Community Housing Cymru Group (CHC Group) is the representative body for housing associations and community mutuals in Wales, which are all not-for profit organisations. Our members provide over 158,000 homes and related housing services across Wales. In 2014/15, our members directly employed 8,800 people and spent over £2bn (directly and indirectly) in the economy, with 79% of this spend retained in Wales. Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

Our objectives are to:

- Be the leading voice of the social housing sector.
- Promote the social housing sector in Wales.
- Promote the relief of financial hardship through the sector's provision of low cost social housing.
- Provide services, education, training, information, advice and support to members.
- Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

Our vision is to be:

- A dynamic, action-based advocate for the not-for-profit housing sector.
- A ‘member centred’ support provider, adding value to our members’ activities by delivering the services and advice that they need in order to provide social housing, regeneration and care services.
- A knowledge-based social enterprise.

In 2010, CHC formed a group structure with Care & Repair Cymru and CREW Regeneration Wales in order to jointly champion not-for-profit housing, care and regeneration.

1. Do you agree with the proposal for relevant authorities to demonstrate how they will implement “Ask and Act” (the guidance issued under section 15 of the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015)?

We agree that relevant authorities need to show leadership in how they will implement ‘Ask and Act’. This will help with multi-agency working and bringing together all regional partners in efforts to end Violence against Women, Domestic Abuse and Sexual Violence and ensure that victims receive appropriate and uniform support. We commend having senior people within relevant authorities to lead on implementing ‘Ask and Act’ as this will ensure that organisations are committed to the task and that actions and decisions can be carried forward more effectively.

We welcome that those relevant authorities already engaged in different ways of eliminating violence against women, domestic abuse and sexual violence, are not required to come up with new ways of working and also that there is flexibility in implementing ‘Ask and Act’ depending on each organisation’s responsibilities. This we believe will allow organisations to better utilise their existing resources while at the same time implementing ‘Ask and Act’ in an effective manner.

We also believe that clearly setting out ‘Ask and Act’ will help in creating uniformity across all organisations for clients seeking assistance for violence against women, domestic abuse and sexual violence.

We commend that the work will be carried out in collaboration at a regional level and that relevant authorities will have an opportunity to build networks with partners across their respective regions. Also utilising arrangements such as Safeguarding Boards means that a lot more partners can be involved in the discussions and training initiatives around ‘Ask and Act’.

2. Section 3 of the guidance relates to the pre-planning, planning and implementation of a local or regional approach to “Ask and Act”. It is aimed at leaders, co-ordinators and managers. Is this section fit for purpose? What additional information is required?

We believe that having identified leaders and coordinators leading on the implementation of “Ask and Act” will help ensure that organisations are committed and decisions around the Violence against Women, Domestic Abuse and Sexual Violence agenda are easily taken. The guidance sets out the stages effectively and we think that this will adequately assist relevant authorities in establishing the necessary collaborative and multi-agency working partners and processes. Having an identified individual also means that partners are able to engage more effectively across organisations. This should also help in the proper identification of all partners that require training in order to participate fully in ‘Ask and Act’.

We would like to reiterate what we provided in the consultation on the National Training Framework, that other strategic partners within the third sector such as housing association partners who help to deliver housing and support services to vulnerable communities should be fully listed as partners requiring training around “Ask and Act”.

We also recommend that prioritised professional roles include those dealing with money, debt and welfare benefits, are recognised as part of the group of those requiring training, since financial abuse, which is abuse in itself, is also an indicator of domestic abuse.

We believe that the 'train the trainer' training should be equitably distributed to cover sectors that include housing, health, education etc. with at least one person from each of those sectors participating. Following this it should be the responsibility of individual organisations to utilise these trainers to deliver 'Ask and Act' within their organisations.

3. Section 4 of the guidance relates to good practice for “Ask and Act”. It is aimed at practitioners. Is this section fit for purpose? What additional information is required?

The guidance for practitioners is exhaustive and asks the right questions around prevention and supporting women facing violence against women, domestic abuse and sexual violence.

4. It is important that “Ask and Act” integrates complements and aligns to existing statutory safeguarding processes. What more should this guidance include to clarify practice around these issues? What related guidance/processes/protocols should be referenced?

Every social landlord in Wales now has a domestic abuse policy for both tenants and staff following an intervention by the then Welsh housing minister Carl Sargeant which required a checklist for housing associations. This listed requirements such as committing to training all staff on the implications of domestic violence and to reviewing and monitoring policies for tackling the problem on a regular basis. We believe that general references should be made to any in-house safeguarding policies to ensure that practitioners have accessible information and that they can build on those practices to provide appropriate support through 'Ask and Act'.

5. “Ask and Act” requires long term support and this is acknowledged within the Welsh Government’s training plan for initial implementation. It is proposed that this guidance come into force in early 2016 with pre-planning and planning taking place between September 2016 and March 2017 with ongoing national rollout over three years thereafter. Does this timeframe seem appropriate, are there any aspects which cause concern?

- The three year national rollout provides a good time scale for organisations to build relationships however we are sceptical of the implementation date being early 2016 given that we are already through the first month of 2016. Early 2016 is rather optimistic and a more realistic timescale should be considered.

6. Training for “Ask and Act” will be delivered through a “Train the Trainer” model which uses local expertise and experience to communicate the training messages. What existing local or regional training structures could such a model utilise? What are the challenges associated with this model and how can these be overcome?

'Ask and Act' is a new way of working and we believe that it can be trialled within different structures. We recommend that any partnerships take into account work already taking place around protecting victims of domestic violence which is provided by housing providers, especially social housing providers. Regional Collaborative Committees (relating to Supporting People Funding) that represent a collaborative approach between Local Authorities, landlords, supports providers, health and probation could provide collaboration useful in providing strategic infrastructure for such work.

CHC as an umbrella body of housing associations in Wales offers the opportunity for local health boards and local authorities as the identified authorities, to engage with Housing Associations. The group represents a number of forums and networks within housing associations and these channels can provide channels to provide training, information and share best practice around VAWDASV. We believe that there are a number of challenges to ensuring that the regional forums are representative and allow partners to be trained to ensure multi-agency support for victims of VAWDASV.

7. What opportunities exist to ensure “Ask and Act” provides opportunities to use the Welsh language? Do you have concerns that “Ask and Act” could have an adverse effect on opportunities to use the Welsh language? Please provide specific recommendations which can be incorporated into the “Ask and Act” guidance on the use of safe Welsh language and terminology.

We believe that if the guidance is produced in both English and Welsh there should be enough opportunity to utilise both languages.

8. 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:

'Ask and Act' offers a great opportunity for practitioners to identify instances where they suspect domestic violence is taking place and also an opportunity to do something about it. We see the exclusion of non-relevant partners in the training of 'Ask and Act' as a missed opportunity by the Welsh Government to pull together effective multi-agency responses to Violence against Women, Domestic Abuse and Sexual Violence. RSLs already deal with and manage issues of domestic violence in their properties and we think 'Ask and Act' training should be extended to them in order to provide the opportunity for a wide range of partners able to Ask and Act on suspected issues of domestic violence which will also limit the necessity of instances escalating and being identified only when they reach escalating points by other agencies.

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous please enter here:

January 2016