



MA JH/0471/24

Jenny Rathbone MS  
Chair of the Equality and Social Justice committee

26 February 2024

Dear colleagues

**Inquiry into a public health approach to preventing gender-based violence:  
publication of report.**

I am writing to provide the Welsh Government's response to your Committee's report. Firstly, I very much welcome your focus on this subject; as you so aptly put it in your title, we must 'all play our part', and I welcome the broad thrust of your conclusions which support a public health approach to tackle the causes as well as the effects of gender-based violence. I share your conclusion that 'the critical context for gender-based violence is gender inequality and cultural norms of men as powerholders, decision makers and leaders at societal level, in the work-place and in families'. If we are to tackle these issues, we need a whole society approach particularly through engagement with men and boys. This is the approach we have adopted within our National Strategy, which we are delivering through our National Partnership Board and VAWDASV Blueprint. I regard your report as an endorsement of our overall approach, but there are always areas for improvement and issues where we should challenge ourselves to do better and your recommendations are a valuable contribution in this regard. I will respond to each of your recommendations in turn.

***Recommendation 1.*** *The Welsh Government should adopt a whole-of-government approach and work with partners across public services, the private and third sectors to promote gender equality and inclusivity in Wales. To help to achieve this it should implement a 'gender equality test' which assesses the impact of all policy decisions and legislative proposals on gender equality with the aim of reducing gender disparities. The gender equality test should be introduced as soon as feasibly possible and should be applied to all Welsh Government decisions from December 2024 onwards at the latest.*

**Accept:**

The Welsh Government recognises the importance of ensuring that all policy is integrated to achieve our policy objectives through as many interventions as possible, particularly in the context of the public health principles which underpin our approach. I believe that ensuring

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

effective use of the Integrated Impact Assessment (IIA) is the right way to ensure an effective approach, although I also recognise that there is room for improvement in the application of both IIA and Regulatory Impact Assessment. That is why I have commissioned a review of the assessment of gender as a protected characteristic within the IIA. I believe that we can accommodate the principle of this recommendation and achieve its purpose within the review and a revised IIA process and that this would be more effective than creating an additional mechanism.

Welsh Government's Equality and Human Rights Division is currently undertaking a review of our approach to Equality Impact Assessment, which will produce a new template, guidance and support. This work began at the end of 2023 and will run through 2024, alongside ongoing review of the wider Integrated Impact Assessment process.

The Equality Team has engaged with officials across the organisation in three workshops and, following on from this, will work with departmental equality leads to draft a new template, taking into account questions linked to all of the protected characteristics of the Equality Act 2010.

Sex is a protected characteristic and the assessment of impact on gender is considered within the Equality Impact Assessment.

We are focused on the mainstreaming of equality, which along with the gender policy team, includes gender mainstreaming.

I will report the progress of the review to the Committee within the timetable set out in the recommendation.

You also suggested a further action in support of this recommendation to achieve the objective of a whole government approach:

*Action 1. The Welsh Government should ensure all equality plans address gender disparities, challenge stereotypes and foster a culture of respect and equality. It should work with partners on detailed actions it will take in the short, medium and longer-term to improve public awareness about gender issues, promote women in leadership, and enforce rights that guarantee equality and freedom from discrimination, harassment and violence. An update on these actions should be provided to the Senedd in Plenary within six months of the Senedd debate for this report and annually thereafter.*

I am happy to report on this action through the VAWDASV Annual Report and the Annual VAWDSV Blueprint updates. I would also point to our transparency mechanism for the Gender plan. Officials provide progress updates including an annual progress report to the Gender Equality Forum (GEF) members. The GEF advises on equality issues across Wales and brings together internal and external stakeholders working on gender equality issues across Wales. The membership, terms of reference and minutes are published on the Welsh Government website.

[Gender Equality Forum | GOV.WALES](#)

**Recommendation 2.** *The Welsh Government should embrace its role as an innovator and leader in applying a public health approach to gender-based violence, by:*

- *identifying opportunities to raise awareness and generate shared understanding of the approach and Blueprint;*
- *contributing to the evidence base of what works by proactively publishing progress updates and resources used to underpin the Blueprint;*

**Accept:**

On behalf of all partners within the Blueprint, Welsh Government is leading on the development of a VAWDASV Communication plan which builds on effective campaigns such as [Sound](#) and also sets out how progress of the National Partnership Board and its constituent workstreams will be communicated to stakeholders. The Board has been presented in January with a draft outline of the Communication Plan, which included contributions from Policing in Wales who undertook a stakeholder engagement analysis for the Blueprint. The Communication Plan and tools to further generate a shared understanding of the Blueprint will be finalised by the end of March 2024.

Within our wider plan, there is a commitment to publish progress reports against the VAWDASV Blueprint High Level plan on an annual basis. In addition, we will be enhancing the Welsh Government VAWDASV web pages to publish other documents which are relevant and informative for our stakeholders. We will ensure that these include the progress updates and signposting to resources, as the Committee recommends.

You have suggested a further action in support of this recommendation:

*Action 2. To further aid transparency, we look forward to seeing the workplans and membership details of each of the Blueprint workstreams published and that the Minister has committed to publishing. We will write to the Welsh Government in March 2024 to coincide with the end of the financial year to hold it to account for these commitments.*

We have published the high-level action plans. I am happy to further commit to publish the terms of reference, which includes membership, for the Partnership Board and each of its workstreams. We will ensure the Committee receives a copy of the published information when it is available and within this timescale.

**Recommendation 3.** *The Welsh Government should set out how the development and evaluation of policies which address the intersectionality of GBV will be informed by data, evidence, and analysis. In particular the Welsh Government should provide the Equality, Race and Disability Evidence Units with clarity regarding their priorities and agree timescales for completion of key milestones by end of April 2024. The response should include details of:*

- *the target date for completing the work to establish baseline data and a summary of the baseline indicators it intends to use;*
- *the partners it will work with to gather baseline data and the target date by which data-gathering efforts will be mainstreamed; and*
- *when it anticipates the data gathered by the Units will be able to meaningfully contribute to policy development and evaluation.*
- *continuing to prioritise work with the next generation through effective programmes aimed at children and young people.*

**Accept:**

Policy and Knowledge and Analytical Services officials from VAWDASV and Equalities teams have met to ensure there is synergy and collaboration across both policy areas in relation to addressing the intersectionality of GBV. This includes activity at a strategic level and collaboration across research agendas. Work is underway to identify ways to ensure that the lived experience of people with multiple areas of vulnerability is captured and informs policy development.

Analytical plans are being developed to meet wider evidence needs. This includes identifying global best practice and reviewing support pathways for disabled survivors of VAWDASV. Welsh Government are assisting the blueprint streams to embed awareness of the importance of intersectionality in all aspects of GBV, and within this activity an ability to monitor and evaluate the process.

A task and finish group has been set up to build on the work undertaken in 2019 in relation to the VAWDASV national indicators, which had been paused due to the pandemic. Welsh Government colleagues from policy teams, Knowledge and Analytical Services and the National Advisers for VAWDASV are currently reviewing the indicators adopted in 2019.

A mapping exercise is underway to identify sources of data best suited to inform the individual indicators. While this work is progressing well, there are a number of challenges in respect of using UK data disaggregated to a national level. The intention is that the mapping exercise and draft national indicator set with associated data, will create an effective platform for joint working with other stakeholders.

Knowledge and Analytical Services work closely with the Equality, Race and Disability Evidence Units and have already been sharing knowledge where work may intersect. For example, the on-going data and indicator mapping for the Anti-Racist Wales Action Plan evaluation framework which is seeking to bring together existing indicator frameworks across a range of portfolio areas in Welsh Government.

You have suggested the following action in support of this recommendation:

*Action 3. The Welsh Government should set out the timelines for the creation of the Central Repository and how the repository will support collaboration, knowledge sharing and facilitate research. In particular, the Welsh Government should identify opportunities for researching interventions that engage men and boys specifically in order to add to the evidence base on this issue.*

The plan to create a repository has had to be revised due to resource restrictions and the importance of focusing available resources on front line services during a cost-of-living crisis. Whilst original plans anticipated a staffed institution, the work to develop the repository is now focused on creating 'virtual' networks of the knowledge management capacity across the sector. This work is expected to be completed during this calendar year. In the shorter term we have recognised the need to support the evidence needs of the blueprint and have been working to develop and implement an evidence plan across the VAWDASV national strategy. This initial work will be completed by the end of March this year. Overall, this revised approach represents a robust alternative to the repository previously envisaged, which will benefit from being embedded within the wider work of the Evidence Units.

**Recommendation 4.** *The Welsh Government should take urgent action to ensure that fast-tracked, specific and specialised therapeutic services are available for all babies, children and young people who experience or witness gender-based violence and provide details of these in response to this report. This action should include:*

- *details of how the Welsh Government is enforcing the rights of babies, children and young people who have experienced or witnessed violence to access fast-tracked, specialised therapeutic services;*
- *reviewing the availability of therapeutic services for children and young people who witness or experience violence, and how well these are integrated into the broader health and education system.*

*This work should involve all relevant stakeholders (including the police, CAFCASS and local authority social services) and be progressed at pace with an update provided to the Senedd in the autumn term of 2024.*

**Accept:**

The Welsh Government as part of its Transformation Programme for Children's Services is developing a National Practice Framework. The Framework will be the first set of national standards for children's services in Wales, sitting alongside other All-Wales procedures like

the All-Wales safeguarding procedures. Its aim is to further strengthen and support the translation of policy intent into daily practice.

The Framework has been developed through working with partners to review and strengthen quality and practice to improve service delivery. The standards will reflect a multi-agency approach, as we recognise children who need help and protection often need the support of a number of professionals who work together as a team. The standards will better describe how services for children work driving greater transparency. Working is underway to finalise the first 6 new standards by the end of March 2024 with the others being co-produced by the end of 2024.

The first six new standards will be:

- The Child-inclusive practice standard;
- The Trusted Adults standard;
- Eyes on the child: the Child Safeguarding standard;
- The Missing children and young people standard;
- The Continuing Care standard;
- The Manageable workloads standard.

In addition, I would acknowledge that gaps in support for children and young people are likely to exist within survivor support services themselves. I am happy to commit undertaking a review of provision in this area and to reporting early findings to the Senedd within the timescale indicated.

The Welsh Government is currently consulting on a new, all age Mental Health and Wellbeing Strategy and a Suicide and Self-Harm Prevention Strategy. These strategies set out our vision and priorities for mental health, wellbeing and for suicide and self-harm prevention. A fundamental focus of the new Mental Health and Wellbeing Strategy is delivering a connected system of support across health, social care, third sector and wider, where people can access the right service, at the right time, and in the right place.

Care and support will be person-centred, compassionate and recovery-focused, with an emphasis on improving quality, safety and access. People impacted by violence, domestic abuse, sexual violence and assault are identified in the Mental Health and Wellbeing Strategy as an under-served group. During the consultation, there will be specific engagement with those with lived experience.

You have suggested a further action in support of this recommendation:

*Action 4. Some of the particular challenges faced by migrant women were set out in our report: 'Gender based violence: The needs of migrant women'. We will be requesting an update to the recommendations and conclusions of that report in Spring 2024.*

I am happy to commit to providing the update within the timescale indicated.

**Recommendation 5.** *The Welsh Government should request that Estyn's Chief Inspector of Education and Training in Wales undertakes a national thematic review of healthy relationships in schools. The review should be included in the next available programme of thematic reviews and completed within the usual timescales.*

*The review should:*

- *include views and recommendations on the sufficiency of resources and training for teaching healthy relationships;*
- *seek to verify whether there is any link between a lack of provision and higher levels of deprivation; and*
- *identify best practice with regards to 'whole school approaches' to preventing GBV.*

**Accept:**

The last thematic review into Healthy relationships was in 2017. With the new curriculum making healthy relationships education mandatory as part of Relationships and sexuality education, this would be a good opportunity to review practice and impact at an early stage of implementation. Conversations have already taken place with the Chief Inspector who is happy to commit to a review of the nature set out by the Committee.

In addition; [The Peer on Peer Sexual Harassment Plan](#), published on 24<sup>th</sup> January 2024, sets out the actions Welsh Government and partners will take to prevent and respond to the issue of peer-on-peer sexual harassment and harmful sexual behaviour ([HSB](#)) in education settings. The Plan has been developed and refined by engagement with a range of partners, across sectors. This includes education, local government, Police and the third sector.

We look forward to continuing these conversations as we move into delivery of the Plan. It is this spirit of partnership that will ensure we can ensure all our learners have access to a safe learning environment.

***Recommendation 6.*** *The Welsh Government must take immediate action to ensure that teachers are reminded of the mandatory reporting duty placed on them in relation to FGM. Longer-term, the Welsh Government should work with Estyn on establishing monitoring arrangements and safeguards to provide assurance that teachers are aware of their legal duties in relation to preventing GBV. The work to establish these monitoring safeguards should be completed by September 2024.*

**Accept:**

We will write to schools to reinforce the importance of reporting incidence of FGM. Estyn inspectors will continue to evaluate whether all school staff are clear about their responsibilities and what they need to do to protect pupils, including 'PREVENT' duties. The strengthened inspection framework and inspection guidance also sees a review of the professional learning offer in schools and PRUs to assess how well teachers are supported in responding to issues of gender-based violence female genital mutilation. Estyn are also rolling out workforce skills training to the whole inspection workforce, to ensure all inspectors are equipped with skills and knowledge on responding to safeguarding issues.

You have suggested a further action in support of this recommendation:

***Action 5.*** *The Minister for Education should write to higher education institutions in Wales to remind them of the Welsh Government's expectations and direct the Commission for Tertiary Education and Research to work with universities to agree actions which strengthen preventative approaches across the sector.*

I have asked the Minister for Education to write in the way that is suggested.

***Recommendation 7.*** *The Welsh Government should require its newly established Advisory Panel for Digital Resilience to agree its priorities and forward work programme at pace and publish these by the end of April 2024. The Panel should clarify which areas it will prioritise, estimated timescales for sequencing of its forward work programme and how it will address the significant areas of non-devolved policy and legislation relating to digital and online regulation.*

**Accept in Principle:**

Whilst I am very comfortable with the purpose of this recommendation I would like to consult the Panel about their role, purpose and work programme in light of this recommendation.

In addition, we have a programme of work in this area which addresses issues the Committee raises.

From a Digital Resilience in Education perspective, our information, guidance and support on online image abuse and sextortion is focussed on young learners, practitioners and parents and carers. Welsh Government holds the firm belief that safeguarding is everybody's responsibility and have called for social media platforms to recognise their responsibility and duty of care to social media users of all ages.

It is critical that we hold social media platforms to account and the Welsh Government is fully supportive of introducing clear and consistent standards across social media platforms to improve user safety.

The Internet Watch Foundation (IWF) report that in the first 6 months of 2023, they received more reports involving 'sextortion' than in the whole of 2022. Older teens (14 – 17 years old) are the most at risk, with boys apparently being targeted most often.

We welcome the intentions set out in the UK Government's Online Safety Bill (which received Royal Assent on 26 October 2023) in seeking to address illegal and harmful content online, with the aim of preventing harm to individuals in the United Kingdom.

The Welsh Government is committed to collaborating with UK-wide partners and other governments to take coordinated actions to meet our common aims to enhance online safety provision, policy and practice.

[Reporting Harmful Content](#) is a national reporting centre that has been designed to assist everyone in reporting harmful content online.

Within the Hwb [Keeping Safe Online](#) pages, there is a range of advice and guidance for parents and carers, children and young people and practitioners on topics such as advice for children and young people:

[Online issues and worries: online body image and self esteem - Hwb \(gov.wales\)](#)

[Online issues and worries: online sexual harassment - Hwb \(gov.wales\)](#)

[Online issues and worries: sharing nudes - Hwb \(gov.wales\)](#)

Last month, we published a "Views from the Experts" article by the Internet Watch Foundation (IWF) on sextortion (sexually coerced extortion) which may be useful; [Sextortion: sexually coerced extortion - Hwb \(gov.wales\)](#)

**Recommendation 8.** *The Welsh Government should work with health bodies to enhance the ability of healthcare professionals to identify and respond to GBV. To give effect to this recommendation the Welsh Government should:*

- *extend the Ask and Act duty to other health and social care professionals and issue revised guidance to GPs in the first instance;*
- *track and publicly report statistics on the participation of staff in training programmes;*
- *collate and publish statistics on the timeliness of response times (between disclosure and being seen by a specialist) to Ask and Act referrals;*
- *and clearly outline the methodology for measuring the impact of training initiatives.*

*This work should be completed by March 2025.*

## **Accept:**

In accepting this recommendation, I should stress that participation in Ask and Act is not as a result of a duty. Instead, the VAWDASV (Wales) Act 2015 establishes the power for Welsh Ministers to issue statutory guidance and for Local Health Boards and Local Authorities to produce local strategies. Ask and Act results from this guidance and its application can be guided by those local strategies. The Sustainable Whole Systems Approach workstream of our National Partnership Board is reviewing the current guidance

and regional arrangements as part of its work plan. This review and the revised guidance that will follow can take on board the principles of this recommendation to ensure that health and social care professionals and GPs fully participate in training.

Following the review of Ask and Act, completed in 2022, from January 2023 we extended the opportunity for a wider range of VAWDASV professionals that do not fall under statutory roles to take part in Ask and Act training. Of course, the statutory bodies already covered included Local Health Boards and NHS Trusts.

The 2022 review found that Ask and Act was 'seen by those who participated in the evaluation as an important and valuable programme which is having an impact across Wales.' I do acknowledge the value of publishing additional data which would allow further scrutiny and accountability of the effectiveness of the programme. I am happy for this to be addressed through our ongoing development of the National Training Framework and recognise the timescale recommended by the Committee.

***Recommendation 9.*** *The Welsh Government should establish a seventh workstream within the VAWDASV Blueprint whose mission will be to make ambitious recommendations on how businesses and organisations can create safer and more equal workplaces. The workstream should cover practical information on the policies, procedures and training necessary to support this aim. The group should operate in a spirit of social partnership with representation from employers and trade unions*

**Accept in Principle:**

The Committee will be pleased to note progress has been made in this area. Whilst I am happy to address the issues raised by the Committee, we do have a mechanism which can successfully address them in our well-established Workplace workstream which is co-chaired by a Chief Superintendent from Gwent Police, on behalf of Policing in Wales, and the General Secretary of Wales TUC. I shall therefore refer the Committee's findings and recommendations to the existing workstream for their consideration in support of the objectives set out in your report.

***Recommendation 10.*** *The Welsh Government should consider funding a nation-wide public awareness campaign with a top male, sporting role model who can inspire other men and boys to take a stand against violence and promote positive values and behaviours. It is important this person is well-informed about the issue and receives appropriate training to effectively communicate and advocate for change. An evaluation of impact should be undertaken at the end of the campaign.*

**Accept:**

We are committed to using public awareness campaigns of the type mentioned as part of our strategy to engage with men and boys to address gender inequality, misogyny and the culture of 'toxic masculinity' which is promoted in some quarters but does not represent all men. We are engaged with the FAW and WRU to ensure that sport plays its part in the whole society approach we are undertaking. The recent findings of institutional sexism highlighted within the WRU, while being of deep concern, do provide an opportunity in the evident commitment of the WRU to turn these matters around. We will take advantage of that commitment to make a contribution which extends beyond Rugby itself.

However, in our work with communications and social media experts such as Cowshed, with whom Welsh Government is contracted to deliver campaigns of this type, we have identified that, among those who carry influence with young people, role models from outside the world of traditional sports carry significant weight. (e.g. gaming, trades and industry, music). For this reason, our next round of campaigns may well focus on other areas, as we focus on achieving the greatest possible impact.

As an example of our approach, I would point to the [Sound](#) campaign which I regard as a significant success. This campaign, which works with young men and boys in a number of settings, has proved to have considerable reach. The evaluation done so far has shown that the key messages and content reached a huge proportion of the target demographic during the campaign period (327,000 men aged 18-34, in Wales, during July-September 2023.) The campaign achieved this by targeting said demographic through segmentation of their interests, locations, language, education and professions. Content that focused on very specific areas of interest, or relatability, proved extremely effective and gave a more receptive 'in' to an often-difficult to engage topic.

We will continue to target and evaluate our campaign work in the way the Committee suggests, relying on the very practical expertise that specialists bring to our approach.

***Recommendation 11.*** *The Welsh Government perpetrator workstream should undertake a rapid review of perpetrator programmes designed to prevent GBV that are available across Wales. The review should seek to provide assurance that each programme considers the safety of survivors and can evidence effective rehabilitation. It should also consider different cultural and contextual factors that can influence the effectiveness of perpetrator programmes and be completed by June 2024.*

**Accept:**

I welcome this recommendation and share the Committee's eagerness to improve our response to perpetrators as a means of reducing GBV. We have already begun an exercise which matches the purpose of this recommendation, through our Blueprint Tackling Perpetration Workstream. We launched a Wales wide survey in December 2024, which closed on Feb 9<sup>th</sup> 2025. This exercise gathered information about all existing perpetrator services currently being delivered across Wales. It includes information relating to eligibility criteria, risk levels, accreditation, victim safety and type of delivery model.

The findings of the survey, which will identify gaps in service delivery, and thematic trends, will be reported to the National Partnership Board in July 2025. This work will continue through the Tackling Perpetration Delivery Plan and the Sustainable Whole System Approach workstream to drive and support evidence based, needs led, commissioned services, that will recognise specific cultural needs as the Blueprint model progresses. This recommendation has been drawn to the attention of workstream members for their support in ensuring that the recommendation is met. An update will be included in the Blueprint annual report.

***Recommendation 12.*** *All Members of the Senedd should commit to completing training on GBV prevention by the end of 2024. Alongside this commitment, Senedd Member Support Staff and Senedd Commission staff should be encouraged via the appropriate channels to participate in such training.*

*This should be sought from a best practice provider and seek to address cultural norms and practices that perpetuate GBV whilst respecting cultural diversity.*

Whilst I very much support the principle of extending understanding of GBV to all as we must 'all play our part', it would, of course, be inappropriate for the Welsh Government to respond on behalf of the Senedd in this regard. I assume you have referred this recommendation to the appropriate authority.

***Action 8:*** *The Welsh Government should work with local authorities and/or the Welsh Local Government Association to ensure that local councillors have access to similar training and resources aimed at tackling GBV and report back by the end of 2024.*

I am happy to commit to discussing the matter with the WLGA with a view to this action being delivered.

There were two further actions set out in your report.

*Action 6. The Welsh Government should publish the results of its bystander intervention initiative as soon as possible after completion.*

I am happy to commit to this action.

*and*

*Action 7. The Welsh Government should report back on its work with Public Health Wales to consider whether a specific approach to alcohol abuse is necessary, and whether they intend to commission any research or data collection to better understand the relationship between alcohol and GBV given the gap in the evidence base. An update should be provided to the Senedd in the autumn term of 2024.*

I would point the Committee to the “Good Practice Framework for Violence Against Women, Domestic Abuse, Sexual Violence and Substance Misuse” [good-practice-framework-for-violence-against-women-domestic-abuse-sexual-violence-and-substance-misuse.pdf \(gov.wales\)](https://gov.wales/good-practice-framework-for-violence-against-women-domestic-abuse-sexual-violence-and-substance-misuse.pdf) which was published in 2018, but I am happy to ensure that the Welsh Government will discuss this further with Public Health Wales and consider what action is required and provide an update to the committee in due course”.

I hope this response demonstrates my commitment to work effectively with others and as I told the Committee during your evidence sessions, ‘we will learn together’. Once again, I thank you for your important contribution to our shared endeavour to make Wales the safest place in Europe to be a woman or a girl.

A handwritten signature in black ink that reads "Jane Hutt". The signature is written in a cursive style with a large initial 'J' and a distinct 'H'.

**Jane Hutt AS/MS**  
**Gweinidog Cyfiawnder Cymdeithasol a'r Prif Chwip**  
**Minister for Social Justice and Chief Whip**