

Response to Draft Statutory Guidance on
Multi-Agency Collaboration in respect of violence against women,
Domestic abuse and sexual violence
November 2015

1. Does the draft guidance provide the information to help relevant authorities establish collaborative working arrangements to assist them in meeting their duties under the Violence against Women Domestic Abuse and Sexual Violence (Wales) Act 2015?

Neath Port Talbot County Borough Council has concerns that there are elements of the guidance that are not requirements under the legislation. It is important that the final guidance clearly distinguishes between those things that are mandatory – a requirement under the legislation and those things that are not mandatory;

P9: 'support must be provided for the work of the National Adviser to raise awareness and to monitor, coordinate and improve provision and practice' - there does not appear to be a duty in the Act to do this.

P11: 'where and when there is a recognised need to establish any new for a, relevant authorities must follow the Project development model for client focussed multi-agency for a (Chapter 9) to ensure it is monitored for purpose, effectiveness and outcome – there does not appear to be a duty in the Act to do this.

Additionally, any new duties placed upon authorities need to be accompanied by a corresponding allocation of sufficient financial resources.

2. Are there any barriers to successfully establishing and operating collaborative working arrangements?

As stated above Neath Port Talbot has concerns that the guidance seeks to place obligations upon parties that are not provided for in the Act. There are clearly duties upon local authorities and health boards, however, the guidance seeks to also place duties on a wider range of organisations which are not contained within the Act. Consequently, whilst we would agree that a broad based partnership model provides for effective planning and delivery of services, other agencies can only be engaged on a voluntary basis. The guidance must make this clear in its final iteration.

There is confusion over the footprint of collaborative working. The Act clearly expects strategies to be developed on a local authority area basis, but there are other messages emanating from Welsh Government which suggest a regional model may be preferred. At a time when the future shape of local government is also under consideration, it will be important to ensure that the initial building blocks for collaborative working are developed from the existing local authority structures in order that there can be a smooth transition to wider area collaboration, once the footprint for local

government is decided after the Welsh Government elections in May 2016. Actions to impose regional solutions across Wales in the short term are not likely to be helpful as the history and capacity to embrace a regional approach will vary across Wales.

3. Do you agree with the requirements proposed in relation to strategic collaboration arrangements?

Whilst the guidance might usefully point to models of partnership working that local partnerships could contemplate, it is not considered helpful to impose a uniform model across Wales. Partnership arrangements already exist and it is important that they are empowered and enabled to develop as fits local circumstances. The guidance needs to be clear as to what the Welsh Government has the power to mandate under the legislation and what is advisory only. The guidance as it is currently drafted unhelpfully mixes up what is required and what is discretionary.

The timetable for producing the Strategy is not aligned with the Well-being of Future Generations (Wales) Act 2015 and associated requirement to establish Public Service Boards in each local authority area. Neither is the requirement aligned with the assessment required under the Social Services and Wellbeing Act 2014. In practice the needs assessment for the Violence Against Women, Domestic Abuse and Sexual Violence will be done at the same time as the Wellbeing of Future Generations Act 2015 and the local domestic abuse etc strategy will be formed within the same timetable for producing the first Wellbeing Plan of the Public Service Board.

Further to previous comments; where in the legislation does it state that authorities must follow the Project development model for client focussed multi agency fora?

4. Do you agree with the requirements proposed in relation to operational collaboration arrangements?

The Violence Against Women, Domestic Abuse and Sexual Violence Act does not place a duty on local partners to have Operational Partnerships that deliver the local strategy and oversee the functions of frontline fora etc. The guidance needs to be clear this is advisory not mandatory.

5. Do you agree with the requirements proposed in relation to Multi-agency fora for responding to individual cases?

Multi-agency case conferencing models are well-established. We do not agree that the MASH model should be mandated at this point in time and there is no requirement in the Act to do so. Consequently, this is another aspect of guidance which can only be discretionary, not mandatory.

6. Do you agree with the requirements proposed in relation to the role of individual organisations in collaborative working?

We agree with the general sentiment here, however, this is again another area which must be discretionary as there is not requirement in the Act do carry out these roles in the way the guidance describes.

7. Do you agree with the Project development model for client focussed multi-agency fora?

We do not necessarily disagree with the model, however, it must be left to local determination as to which particular partnership model work best in local circumstances. There is no requirement in the Act to adopt a particular model.

8. What opportunities are there to promote the use of the Welsh Language in relation to this guidance? :

We would expect to work within the framework of Welsh Language Standards that are applied to the Council generally which in itself would promote the use of the Welsh Language in a way which is proportionate and reasonable within our local circumstances.

Do you have concerns that any part of this guidance could have an adverse effect on opportunities to use the Welsh language? :

See above – question 8

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: :

The Council is concerned that there is inadequate financial resources identified to support the delivery of the policy objectives. The guidance focuses on process and structure but funds are required to put in place the range and quantum of services that are need to prevent people from becoming perpetrators and victims and for supporting people affected by violence. We are also concerned that despite the clear priority given by Welsh Government to gender-based violence that there are few sources of recurring funding that have been transferred into revenue and capital base budgets. Consequently, the ability of agencies to develop an effective workforce are constrained by the short term nature of employment contracts which do not provide a suitable environment for recruiting and retaining a skilled and committed workforce that can make a difference in the lives of vulnerable people. Without addressing these serious concerns about resources, it is unlikely that there will be discernible improvements in outcomes in the short to medium term.

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 tick the box: