



Response to the Welsh Government: National Training Framework on gender- based violence, domestic abuse and sexual violence

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About Citizens Advice Cymru

Citizens Advice is an independent charity covering England and Wales operating as Citizens Advice Cymru in Wales with offices in Cardiff and Rhydolunghi. There are 20 member Citizen Advice Bureaux in Wales, all of whom are members of Citizens Advice Cymru, delivering services from over 250 locations.

The advice provided by the Citizens Advice service is free, independent, confidential and impartial, and available to everyone regardless of race, gender, disability, sexual orientation, religion, age or nationality.

The majority of Citizens Advice services staff are trained volunteers. All advice staff, whether paid or volunteer, are trained in advice giving skills and have regular updates on topic-specific training and access to topic-based specialist support including housing.

The twin aims of the Citizens Advice Bureau service are:

- to provide the advice people need for the problems they face
- to improve the policies and practices that affect people's lives.

Local Bureaux, under the terms of membership of Citizens Advice provide core advice based on a certificate of quality standards on consumer issues, welfare benefits, housing, taxes, health, money advice, employment, family and personal matters, immigration and nationality and education.

We are happy for our response to be made available to the public.

Please note: throughout this response gender based violence and abuse will be referred to as GVA.

Summary of Key Points

Citizens Advice Cymru ask Welsh Government that:

- Financial abuse is included in detail within all levels of the National Training Framework, but particularly at Level 1 in order to raise awareness and understanding of this prevalent form of abuse.
 - We would welcome discussion with Welsh Government on the development of this material.
- All online and associated materials are made freely available to both private and third sector services that are public facing.
 - Overtime, we want to see Level 1 training as a mandatory requirement for any outsourced public service.
- Guidance requires Local Authorities to offer Level 2 training to all staff providing information, advice or guidance in the areas of welfare benefits, debt, financial inclusion, tenancy support, and independent living.
- Adequate funding is made available to ensure:
 - Specialist support services can manage any increase in the identification of GVA victims seeking further information, advice, guidance and support as a result of increased awareness of GVA issues.
 - That appropriate staff can be released to participate in the proposed regional training consortia and carry out the required development and supporting work as well as delivery of training.
- A consumer rights based approach is taken with Welsh speakers, consulting, engaging and supporting them to enable the design of appropriate resources that meet their language and cultural needs.

While we acknowledge that the National Training Framework is for the Welsh public sector, we advocate that all steps possible are taken to ensure that non-devolved bodies such as the Department for Work and Pensions are encouraged to participate to ensure a holistic and cohesive service for the people of Wales. Involvement of non-devolved public service staff, and in particular, the Department of Work and Pensions, based within Wales should have access to the training and encouraged to participate to help ensure that appropriate consideration is given to the way in which benefits are distributed within families in cases of financial abuse. This is particularly important given the proposal that universal credit be received into one account per household.

We would also welcome, where appropriate, the inclusion of survivors and perpetrators stories in their own words.

Question 1: What opportunities exist for integration or alignment of parts of the National Training Framework on gender-based violence, domestic abuse and sexual violence into the Continuous Professional Development (CPD) Frameworks professionals are already working within?

We believe that work should be undertaken with specific professional bodies representing front facing public services, such as health, social care and the police to consider the best means of integration. We would strongly support the integration into these professionals' learning from the earliest stage, such as social work or medical degree courses delivered by Welsh Universities so that the knowledge is embedded and it supports the wider public campaign to raise awareness and understanding of GVA.

Within Citizens Advice, we are currently considering the best means of integrating in a sustainable manner our training on gender-based violence which is supporting the roll out of our ASK Routine Enquiry (ASK RE) program. The ASK RE program is being developed to ASK a routine question about the client's experience of gender based violence and abuse (referred to as GVA throughout this response) as part of the advice process, giving clients an opportunity to disclose abuse fairly early in the advice process. We are beginning the programme with bureaux volunteering to be early adopters. The process will be carried out in face to face advice settings only and mainly in debt and benefit enquiries. Currently the 2 day training course is delivered via a contractual relationship with AVA (Against Violence and Abuse) to advice session supervisors in order to provide them with the skills and knowledge base to then roll out the ASK RE approach to their advisors in bureaux. The supervisors then cascade training to advisers and this training provided in bureaux will be (from Jan 2015) supported by a general entry e-learning program designed for staff and volunteers across the Citizens Advice network, similar to level 1 within the National Training Framework.

Work is ongoing internally as to how to integrate the material into our advice session supervisors training and development program, or whether to keep the training as a separate module to ensure the content is delivered appropriately by people with specialist knowledge and experience. We believe there are potential risks involved with integrating the GVA training for our bureaux members and the clients they support. This is based on concern that integrating the content and delivery could mean staff are not adequately up-skilled or suitably enabled to appropriately respond to disclosure. We would welcome discussion with Welsh Government and the sharing of learning outcomes on integrating specialist GVA training into mainstream training and CPD programs, as well as shared good practice concerning e-learning.

Question 2: What opportunities exist to ensure the National Training Framework provides opportunities to use the Welsh language? Do you have concerns that any part of the National Training Framework could have an adverse effect on opportunities to use the Welsh language?

Citizens Advice Cymru believe that Welsh speakers are best placed to inform the development of the Welsh language approach within the National Training Framework. We advocate for a consumer rights based approach with Welsh speakers consulted, engaged and supported to use their language and design services that meet their language and cultural needs.

Question 3: Do you agree with the proposed learning outcomes, assessment criteria, delivery structure and outcomes proposed for level 1 (page 16)?

Citizens Advice Cymru agree with the proposed learning outcomes, assessment criteria and delivery structure for level 1. As highlighted in our evidence and our recent publication '[Controlling Money, Controlling lives: Financial Abuse in Britain](#)', we believe that financial abuse is under-reported, identified or understood. Financial abuse is often just one component of the coercive control perpetrators use against their victims, which can continue after separation and have long-term effects on individuals' financial stability. As Citizens Advice knows well, financial stability underpins the central elements of people's lives; their income and ability to care for and house themselves and their families. Part of the reason financial abuse is so corrosive, and can have such a long term impact, is its ability to disrupt these foundations. We would therefore welcome specific inclusion of this form of GVA in detail within all levels of the National Training Framework, but particularly at level 1 in order to raise awareness and understanding of this prevalent form of abuse.

We ask that the online and associated materials are made freely available to both private and third sector services that are public facing, with targeted work to actively encourage the take up of these resources considered as part of the longer term plan for the National Training Framework.

We believe it is particularly important that any service delivering public services via a contractual arrangement is offered the opportunity and encouraged to access and complete level 1 training, whether it is a privately owned homecare service, a financial inclusion advice service, or in-school catering. We would want to see that overtime level 1 training is a mandatory requirement for any outsourced public service, particularly in light of local authority reorganisation and the greater reliance on external delivery partners within the Welsh public sector.

Question 4: Do you agree with the proposed learning outcomes, assessment criteria, delivery structure and outcomes proposed for level 2 (page 21)?

Citizens Advice Cymru agree with the proposed learning outcomes and assessment criteria for level 2.

We have some reservations about the ongoing sustainability of the delivery structure proposed in light of the targeted professionals to deliver the training locally being under increasing pressure and restricted time beyond core, mandatory duties. Release of the trainers from their day jobs without providing funding to cover their frontline posts may be increasingly difficult over the proposed timescale due to public services in Wales operating lean services with little room for covering vacant posts.

We would welcome Welsh Government commitment to providing funding to ensure that appropriate staff can be released to participate in the proposed regional training consortia and carry out the required development and supporting work as well as delivery of level 2 training. Without this additional financial support we are concerned that the regional training consortia may not be able to deliver the outcomes as planned, or form an essential part of the strategic response to ensuring the ongoing achievement of the aims of the Gender-based Violence, Domestic Abuse and Sexual Violence (Wales) Bill.

Question 5: Do you agree with the list of relevant professionals prioritised for training at level 2 (Ask and Act) (page 23)?

Yes. Additionally, those listed for prioritisation should include a wider range of social workers, given the variation of social services structures to ensure targeted inclusion of those working with client groups who have an increased likelihood of being affected by domestic violence, e.g. Looked After Children and Approved Mental Health Professional social workers.

Question 6: Which professionals do you consider must be added or removed from the list bearing in mind overall resource constraints?

We note that the list is not exhaustive and that the priority criteria outlined enables for delivery to a wider range of public facing staff. As highlighted within [our evidence to the Communities, Equality and Local Government Committee on Gender-based Violence, Domestic Abuse and Sexual Violence \(Wales\) Bill](#), we recommend that Local Authorities are required to offer level 2 training to all staff providing information, advice or guidance in the areas of welfare benefits, debt, financial inclusion, tenancy support, and independent living. The tailoring of the GVA training to these groups should consider additional information and resources in relation to financial abuse to ensure their awareness and understanding, as well as the range of agencies available to support victims of financial abuse to deal with any associated debt and to increase their income where appropriate.

In a similar manner, we would recommend that the guidance ensures service providers working in these areas on behalf of public bodies also undertake level 2 training.

Question 7: In what order would you prioritise the professionals to receive training?

We believe that prioritisation should be set at a local regional level, dependent on the skills and knowledge base already in existence. Prioritisation should acknowledge the variation in GVA knowledge, skill-sets and approaches of public services across Wales, dependent on their Local Development Plan, Community Safety Partnership and other strategic drivers.

Question 8: Do you agree with the criteria through which to identify those who should be prioritised for training at level 2 (page 23)?

We would welcome further clarity and examples on how to identify the client groups Welsh Government believe should be prioritised regarding the impact of GVA on an individual's interaction with a service.

Question 9: What observations would you make on the delivery method for level 2? Would you recommend any alternative methods of delivery (page 26)?

As highlighted in our response to Q4 we believe that the delivery model may not be sustainable without appropriate financial support to enable the regular release of staff to participate in and deliver the proposed model.

The train the trainer model may also require additional resources and training which should be made available by Welsh Government to ensure its effective delivery. Professionals may have relevant sector and audience knowledge and experience, but require additional training and support to become effective trainers.

In addition to the classroom learning approach, we would advocate that resources are made available online to enable learners to refresh their knowledge as well as provide signposting to additional information, resources and specialist services. Citizens Advice takes a blended learning approach to ensure that different learners' needs are met and that resources are available for refreshing and checking knowledge.

Question 10: Do you agree with the proposed learning outcomes, assessment criteria, delivery structure and outcomes proposed for level 3 (page 28)?

We believe that the proposed learning outcomes and assessment criteria are clear and will enable participants to safely act to reduce possible risks to clients and their families experiencing GVA. As highlighted in our previous responses regarding the proposed delivery model, we believe that the delivery model may not be sustainable without appropriate financial support and additional resources.

Question 11: Do you agree that all professionals working with the specialist gender-based violence, domestic abuse and sexual violence sectors should be trained to an appropriate level linked to their role?

Yes.

Question 12: Do you agree with the courses listed for specialist professions at level 4?

We would advocate that those providing practical support are aware of financial abuse and agencies best placed to provide specialist support in the areas of debt, financial management and welfare benefits to ensure their clients' get the best specialist knowledge available. We would welcome discussion with Welsh Government on the development of this material.

We support the approach outlined for non-specialists requiring education on specific subject matters should provide greater consistency across Wales and enable clearer learning opportunities and outcomes.

Question 13: Do you agree with the plan to create a consistent, quality assured specialist subject syllabus at level 4 (page 37)?

Please see above.

Question 14: How might the specialist subject syllabus be integrated into existing CPD Frameworks?

We are not best placed to comment on this question. As highlighted in Q1, we are currently looking at integration and acknowledge the possible difficulties outlined within the consultation document regarding integrating GVA into children protection related training. We would welcome discussion with Welsh Government on integration and would be happy to share our learning and experience as we evaluate the roll out of ASK RE across the Citizens Advice network.

Question 15: Do you agree with the proposed learning outcomes, assessment criteria, delivery structure and outcomes proposed for level 5 (page 43)?

We are not best placed to comment on this question.

Question 16: Do you agree with the approach taken at level 6 (page 46)?

As highlighted in Q1, we believe it is particularly important that any organisation delivering public services via a contractual arrangement is offered the opportunity and encouraged to participate in the National Training Framework. It may therefore be relevant to include private and third sector senior management or their representatives within the targeted work for level 6. This will help to ensure that all those delivering public services across Wales are engaged with the National Training Framework and its pivotal role in raising awareness and understanding of GVA to bring about the cultural change desired within the policy intent of the Welsh Government.

Question 17: What other mechanisms would you recommend to engage senior leaders in the gender based violence, domestic abuse and sexual violence agenda and improve awareness of this as a leadership issue?

We would wish to see, where appropriate, the inclusion of survivors and perpetrators stories in their own words. Citizens Advice believe that enabling people to speak for themselves encourages increased participation in their wider community, can increase positive feelings of self-worth and allows people the chance to reflect on and share their experiences to both promote personal integration and acceptance of life events while also helping others to learn. The power of enabling individuals to bear witness of their experiences has been shown in the example of the [Poverty Truth Commission in Scotland](#) who advocate *'nothing about us without us is for us'*.

Question 18: If you have any related issues which we have not specifically addressed, please use this space to report them:

We ask that Welsh Government provide assurances that specialist support services will be adequately resourced to manage any increase in the identification of GVA victims seeking further information, advice, guidance and support as a result of increased awareness of GVA issues.

Research into the impact of asking as a routine enquiry or through targeted enquiry has shown the need for additional time for those asking to enable dealing appropriately with disclosure. We would therefore welcome Welsh Government's acknowledgement of the impact ASK and ACT may have on the delivery of public services and ask that this is monitored and reviewed.

As noted within our evidence, we advocated that strong leadership is required from Welsh Government to ensure appropriate engagement of non-devolved public sector bodies with the Bill and the National Training Framework. As detailed within our recent research into financial abuse, Department for Work and Pensions (DWP) can play an important role in identifying and supporting clients experiencing financial abuse as around half of respondents to our research survey (approximately 300 advisers) had been involved in cases in which the perpetrator controlled or interfered with the victim's benefits. Involvement of their staff based within Wales could therefore potentially help people experiencing GVA to be appropriately

supported and help ensure that appropriate consideration is given to the way in which benefits are distributed within families in cases of financial abuse. This is particularly important given the proposal that universal credit be received into one account per household.

Question 19: Please indicate here if you believe you currently offer training which should be considered for the specialist subject syllabus at level 4. (This information will be passed to the lead for this project, who may be employed within an external organisation, and who will contact you in due course).

For any further information, please contact:

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